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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA : Hon. Mark Falk  
v. : Magistrate No. 19-3676  
JONATHAN L. XIE : **CRIMINAL COMPLAINT**

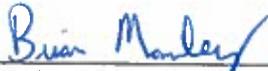
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

**SEE ATTACHMENT A**

I further state that I am a Special Agent of the Federal Bureau of Investigation, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

  
\_\_\_\_\_  
Brian Manley  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed in my presence,

Date 5/21/19 at Newark, New Jersey  
City and State

Hon. Mark Falk  
United States Magistrate Judge  
Name and Title of Judicial Officer

  
\_\_\_\_\_  
Signature of Judicial Officer

ATTACHMENT A

Count 1

(Attempt to Provide Material Support and Resources to a  
Designated Foreign Terrorist Organization)

On or about December 20, 2018, in the District of New Jersey and  
elsewhere, defendant

JONATHAN XIE

knowingly attempted to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including money, to a foreign terrorist organization, namely Harakat al-Muqawamah al-Islamiyya and the Islamic Resistance Movement (HAMAS), knowing that the organization was a designated terrorist organization, and that the organization had engaged and was engaging in terrorist activity and terrorism.

In violation of Title 18, United States Code, Sections 2339B(a)(1) and 2.

Count 2

(Attempt to Provide Material Support and Resources to a  
Designated Foreign Terrorist Organization)

On or about April 26, 2019, in the District of New Jersey and elsewhere,  
defendant

JONATHAN XIE

knowingly attempted to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including money, to a foreign terrorist organization, namely Harakat al-Muqawamah al-Islamiyya and the Islamic Resistance Movement (HAMAS), knowing that the organization was a designated terrorist organization, and that the organization had engaged and was engaging in terrorist activity and terrorism.

In violation of Title 18, United States Code, Sections 2339B(a)(1) and 2.

Count 3

(False Statement)

On or about February 14, 2019, in the District of New Jersey and elsewhere, defendant

JONATHAN XIE

knowingly and willfully made a false, fictitious, and fraudulent statement and representation, in a matter within the jurisdiction of the executive branch of the Government of the United States, namely the United States Army of the United States Department of Defense.

In violation of Title 18, United States Code, Sections 1001(a)(2) and 2.

Count 4

(False Statement)

On or about February 27, 2019, in the District of New Jersey and elsewhere, defendant

JONATHAN XIE

knowingly and willfully made a false, fictitious, and fraudulent statement and representation, in a matter within the jurisdiction of the executive branch of the Government of the United States, namely the United States Army of the United States Department of Defense.

In violation of Title 18, United States Code, Sections 1001(a)(2) and 2.

COUNT 5

(Transmitting Threat in Interstate Commerce)

On or about April 13, 2019, in the District of New Jersey and elsewhere,  
defendant

JONATHAN XIE

knowingly and willfully transmitted in interstate commerce, specifically via the social networking internet website, Instagram, communications containing a threat to injure the persons of another.

In violation of Title 18, United States Code, Sections 875(c) and 2.

ATTACHMENT B

I, Brian Manley, am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have served in this capacity since January 2017. I was previously employed by the FBI as an Intelligence Analyst for approximately nine years. My experience has included the investigation of cases involving the use of cell phones, computers and the Internet to commit terrorism-related offenses. I have received training and have gained experience in interview and interrogation techniques, arrest procedures, obtaining electronically-stored information through criminal process, search warrant applications, and the execution of searches and seizures. I have also received training and information, and gained experience concerning terrorism crimes, as well as the tactics, techniques, and procedures used by terrorism suspects to evade detection. I am fully familiar of the facts set forth herein based upon briefings with other law enforcement officers. Because this complaint is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have only set forth facts that I believe are necessary to establish probable cause. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part. Dates of events are asserted as having occurred on or about the asserted date.

1. HAMAS, also known as Harakat al-Muqawamah al-Islamiyya and the Islamic Resistance Movement, among other names, was established in 1987 at the onset of the first Palestinian uprising, or intifada, as an outgrowth of the Palestinian branch of the Muslim Brotherhood. One faction of HAMAS, the Izz al-Din al-Qassam Brigades, has conducted anti-Israel attacks, including suicide bombings against civilian targets inside Israel. United States citizens have died and been injured in the group's attacks.

2. On October 8, 1997, by publication in the Federal Register, the United States Secretary of State designated HAMAS as a Foreign Terrorist Organization pursuant to Section 219 of the Immigration and Nationality Act ("INA").

3. In or about January 2019, the FBI received information from an individual (Individual #1) who interacts online with Defendant Jonathan Xie regarding possible threats that Individual #1 observed in an online group chat. Individual #1 stated that an individual identified as "Jon" wanted to harm pro-Israel supporters. According to Individual #1, "Jon" claimed to support terrorist groups such as the Taliban, claimed to have donated money to HAMAS, and stated that if he were to conduct an attack, it would be at an

Al-Quds Day<sup>1</sup> parade, where he would gun down pro-Israel supporters. Individual #1 provided Jon's Instagram username/profile (the "Instagram Account"). Individual #1 subsequently advised that Jon's name was Jonathan Xie ("Defendant Xie"), and that Individual #1 believed Defendant Xie lived in New Jersey and worked at a US chain retail store.

4. The investigation revealed that the Instagram Account was an active account for a user identified as "Jon" with Chinese and Arabic text appearing next to Jon's name. The investigation also has revealed additional social media accounts for the same user, including a YouTube account. The YouTube account contained, among other things, a playlist containing approximately 114 videos, many of which advocated and/or propagandized soldiers for Allah, the war in Syria, Hezbollah (a foreign terrorist organization), and the Houthi movement in Yemen, as well as support for Bashar al Assad, Saddam Hussein, and North Korea, among others.

5. According to records obtained from Facebook, Inc., which maintains the records of Instagram (hereinafter "Instagram records"), the Instagram Account was associated with a registered email address j\*\*\*\*\*@gmail.com, and it was frequently logged into from a certain Internet Protocol ("IP") address.

6. The IP address was subscribed to by Defendant Xie's mother, who resided with Defendant Xie in Basking Ridge, New Jersey.

7. On or about April 13, 2019, Individual #1 advised the FBI that on or about April 12, 2019, Individual #2 participated in an Instagram Live video session with Defendant Xie. Individual #2 recorded a portion of the session and posted the video to Individual #2's Instagram account where the followers of Individual #2 could view it. Individual #1 viewed Individual #2's Instagram account and viewed the recorded session. Individual #1 recorded the video playing on Individual #2's Instagram account, and then provided the FBI with a copy of Individual #1's recording.

8. The video revealed a male identified by Individual #1 as Defendant Xie, wearing a black ski mask covering all of his face except his eyes. In the video, Defendant Xie stated, among other things, that he was against "Zionism" and the "neo-liberal establishment." Defendant Xie stated he "has some stuff planned but [he] can't really tell on this stream." When asked if he would go to Gaza and join HAMAS, Defendant Xie said "yes, if I could find a way." Later, Defendant Xie displayed a HAMAS flag and also retrieved a handgun from a box in what appeared to be a closet.

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<sup>1</sup> Al-Quds Day is an annual pro-Palestinian day of protest held around the time of the final Friday of Ramadan.

9. Visible on the box from which the gun was retrieved were the letters H and K, which the FBI assessed pertained to Heckler and Koch, a firearm manufacturer. During the video, Defendant Xie also stated “I’m gonna go to the [expletive] pro-Israel march and I’m going to shoot everybody.”

10. During the course of the investigation, the FBI reviewed firearms registration records maintained by the State of New Jersey, and learned that a handgun was registered to Defendant Xie’s mother, and that two handguns (one of which was a Heckler and Koch 9 millimeter pistol), were registered to Defendant Xie’s father. The FBI assessed that the firearm accessed by Defendant Xie in the Instagram Live session referenced above likely was the Heckler and Koch 9 millimeter pistol registered to Defendant Xie’s father.

11. According to records obtained from Moneygram, on December 20, 2018, a transaction of \$100 was sent from Defendant Xie in Basking Ridge, NJ, to an individual in Gaza, Palestine. The sender’s email address was identified as j\*\*\*\*\*@gmail.com, and the recipient in Gaza was Individual #3. This transaction likely related to Defendant Xie’s statements in or about January 2019 to Individual #1 and to others that he had previously donated to HAMAS. As discussed below, according to Instagram records, on or about April 14, 2019, Defendant Xie sent Individual #4<sup>2</sup> a link to alqassam.net, and described the website as a HAMAS site. The website appears to be operated by the al-Qassam Brigades. While discussing HAMAS and the al-Qassam website with Individual #4, Defendant Xie stated that he (Xie) had previously donated money. Defendant Xie also instructed Individual #4 as to how he/she could make a financial donation, by clicking on a button on the al-Qassam website. According to Instagram records, Defendant Xie had previously posted the following on or about December 22, 2018:

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<sup>2</sup> Individual #4 is an FBI employee acting online in an undercover capacity.



12. According to information received from Google, Inc., Defendant Xie engaged in email communications in November 2018 and December 2018, in which he expressed an interest in joining the al-Qassam Brigades and an interest in sending money to the group. As shown below, Defendant Xie contacted two different email accounts that are listed as contact emails on the Al-Qassam website. Defendant Xie received a response with instructions to send a donation to a named individual in Gaza, Palestine (Individual #3). According to the Google records, j\*\*\*\*\*@gmail.com was subscribed to by "Jon X" with the same telephone number associated with Defendant Xie, and with the same IP address as the Xie residence. According to additional information provided by Google, Inc. the following e-mail exchanges occurred:

November 16, 2018

Subject: Joining the Al-Qassam Brigades  
From: Jon X <j\*\*\*\*\*@gmail.com>  
Date: 11/16/2018, 12:34 PM  
To: "english@alqassam.\*\*" <english@alqassam.\*\* >

As-salamu alykum [Peace be unto you]. My name is Jonathan and I reverted to Islam a few weeks ago. I was wondering if non-Palestinians/non-Arabs would be allowed to join the Al-Qassam Brigades, and if so, what are the qualifications and how do you start the

process of joining? Thanks for taking your time to read, I hope you can help me out!

December 16, 2018

Subject: How to make a donation  
From: Jon X <j\*\*\*\*\*@gmail.com>  
Date: 12/16/2018, 9:42 PM  
To: fund@alqassam.\*\*

Salam alaikum [Peace be unto you]! I saw at the bottom of your website that you can make a donation to the Al-Qassam Brigades by contacting this email address. As a Muslim living in the US, I would like to support the Palestinian resistance as much as possible. Thanks for taking your time to read and hopefully there's a way I can donate!

December 17, 2018

On Mon, Dec 17, 2018 at 3:31 PM alqassam fund <fund@alqassam.\*\*> wrote:

Waalikum As-Salam [And unto you peace] our dear brother,  
We hope that you are doing well Insha'Allah [Allah willing], and thanks for your support to Palestinian resistance.  
Regarding the donations; would you tell us the amount you intend to send so that we can send you the proper way to send it.  
May Allah Bless You

Subject: Re: How to make a donation  
From: Jon X <j\*\*\*\*\*@gmail.com>  
Date: 12/17/2018, 7:10 PM  
To: alqassam fund <fund@alqassam.\*\*>

I plan on donating \$100 (USD), if there are any fees necessary to send the money, I do not mind paying for those as well.  
May Allah Bless You as well. Ameen

December 18, 2018

Subject: Re: How to make a donation  
From: alqassam fund <fund@alqassam.\*\*>  
Date: 12/18/2018, 5:07 PM  
To: Jon X <j\*\*\*\*\*@gmail.com>  
Delivered-To: j\*\*\*\*\*@gmail.com

Dear brother

You can send the money through one of the following programs: express money - money gram - western union

To: [Individual #3]

Gaza - Palestine

It would be very kind of you to tell us if the money is sent (photo copy of the receipt) Thanks

December 20, 2018

Subject: Re: How to make a donation

From: Jon X <j\*\*\*\*\*@gmail.com>

Date: 12/20/2018, 3:47 PM

To: alqassam fund <fund@alqassam.\*\*>

Hello Brother,

I am using Money Gram from my computer to send you the funds.

Attached is an image of the reciever [sic] information, I just want to make sure the info I typed in is correct before I send it. In the 'Receiver country' box, I cannot find a selection specifically for Gaza, only 'Palestinian Territory, Occupied', does this still work?

**MoneyGram** Help | FAQ | Plus Rewards™

### Receiver Information

**Send money to:**  
Send money to almost any country worldwide. Some money transfers arrive in as little as minutes.<sup>1</sup>

Their first name: Individual #3  
Their last name: Individual #3

Add middle or second last name

Receiver country: Palestinian Territory, Occupied

**How will the money be received?**

**Cash Pickup**

Your receiver has the following Cash Pickup options:  
At any location

Additional information:

- The money is typically available for pickup in minutes.<sup>1</sup>
- It can be picked up at any MoneyGram location in the receiver's country, state or province.

For more information visit our FAQs

[Back](#) [Next](#)

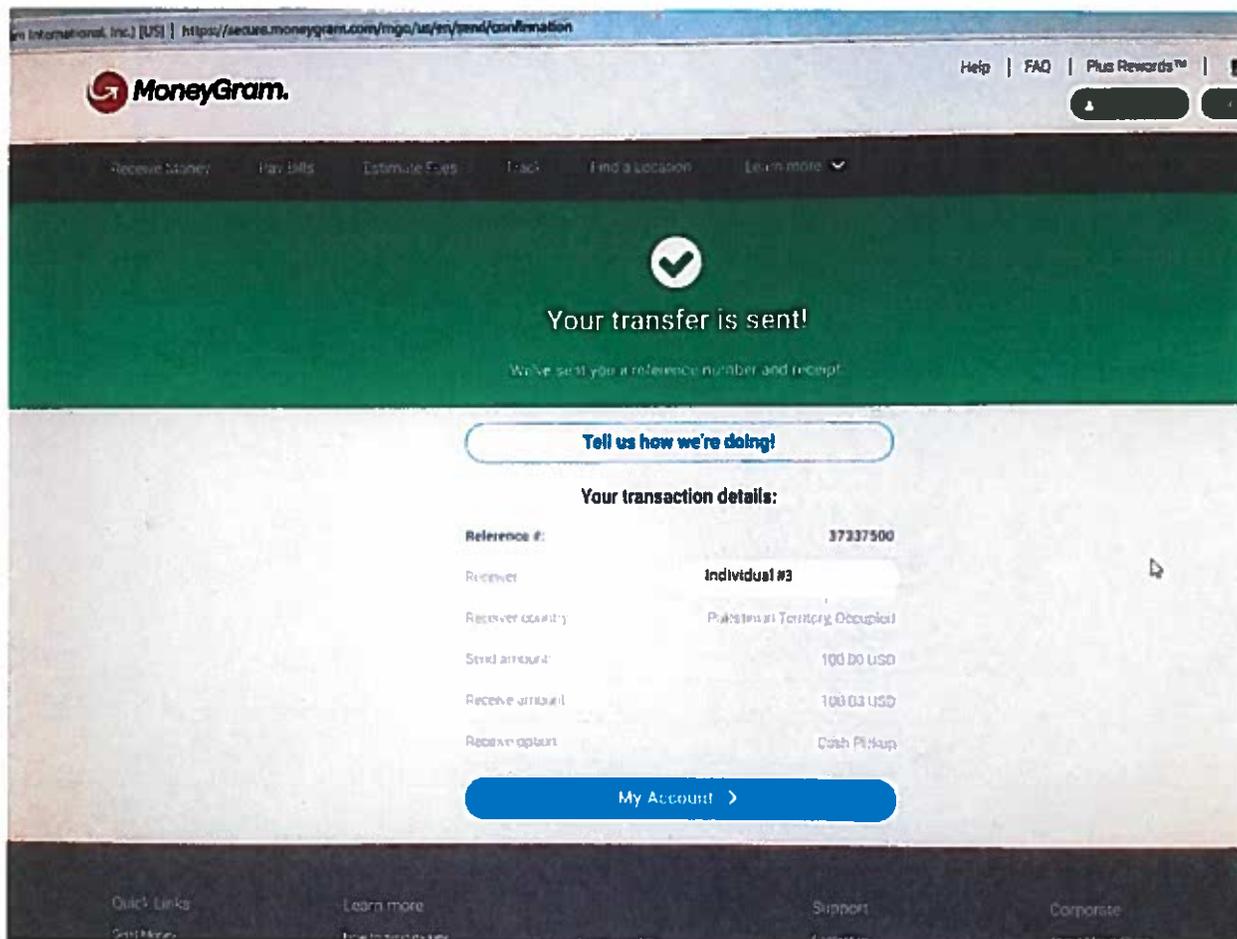
1. Not all agents operating hours and compliance with regulatory requirements.

Subject: Re: How to make a donation  
From: alqassam fund <fund@alqassam.\*\*>  
Date: 12/20/2018, 4:19 PM  
To: Jon X <j\*\*\*\*\*@gmail.com>  
Delivered-To: j\*\*\*\*\*@gmail.com

Hi Bro,  
Yes that's right.  
You can choose Palestinian Territory, Occupied .. it's ok

Subject: Re: How to make a donation  
From: Jon X <j\*\*\*\*\*@gmail.com>  
Sent: Thursday, December 20, 2018 10:21 PM  
To: alqassam fund

Okay, the transaction went through. In the 2nd picture, the Reference Number is 37337500 when you go to receive [sic] the cash pickup. I hope everything works out fine inshallah [Allah willing]. Let me know if you were able to receive [sic] it, brother.



<b>Receiver Information</b>	
<b>Name:</b>	Individual #3
<b>Expected Destination:</b>	Palestine
<b>Receive Option:</b>	Cash Pickup
<b>Reference Number:</b>	37337500 (Used by MoneyGram for tracking)
<b>Date Available in Expected Destination:</b>	20-Dec-18 (May be available sooner)
<b>Transfer Amount:</b>	100.00 USD
<b>Transfer Fees:</b>	+ 12.00 USD
<b>Transfer Taxes:</b>	0.00 USD
<b>Total Cost:</b>	112.00 USD

December 22, 2018

Subject: Re: How to make a donation  
From: alqassam fund <fund@alqassam.\*\*>  
Date: 12/22/2018, 4:04 PM  
To: Jon X <j\*\*\*\*\*@gmail.com>

Dear brother,  
We write to tell you that we received your donation  
May Allah bless with his bounty of barakah [blessings] for yourself and  
your family

December 24, 2018

Subject: Re: How to make a donation  
From: Jon X <j\*\*\*\*\*@gmail.com>  
Date: 12/24/2018, 5:20 PM  
To: alqassam fund <fund@alqassam.\*\*>

Thank you brother, may Allah bless you and your family as well. I pray that one day the Palestinian resistance will be able to overthrow the apartheid Israeli regime. Inshallah.<sup>3</sup>



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<sup>3</sup> Defendant Xie attached an image to this email communication. Based on my training and experience, I recognize this image to be a photograph of the HAMAS flag.

December 25, 2018

Subject: Re: How to make a donation  
From: alqassam fund <fund@alqassam.\*\*>  
Date: 12/25/2018, 5:38 AM  
To: Jon X <j\*\*\*\*\*@gmail.com>

Inshallah

13. Defendant Xie has made additional statements about his support of HAMAS. According to Instagram records, on or about the dates set forth below, Defendant Xie posted the following to the Instagram Account:

January 18, 2019

Xie: I support the Hamas faction of the MB [Muslim Brotherhood].

January 23, 2019

Xie: I'm going to donate more money to Hamas once I get my paycheck.

February 18, 2019

Xie: I'm joining the Army . . .  
I [sic] said I could get arrested . . . If they found out about the  
Hamas shit. . .  
I'm joining the US Army not to fight foe Jewish internets [believed  
to be a typo of "interests"]  
But to learn how to kill  
So I can use that knowledge  
I already got accepted  
Israel does that so they can kill innocent women and children  
Idk [I don't know] if I pass the training  
If I should do lone wolf  
That is why I have to learn military techniques from the Army  
To stop these people

When asked if he would get arrested, Defendant Xie responded: "I don't give a shit. I am political soldier. I am not afraid to die. So that I can carry out something in the future."

14. On or about February 14, 2019, Defendant Xie executed a Security Clearance Application for National Security Positions in connection with his interest in joining the United States Army. On the application, among other things, Defendant Xie listed his telephone number and j\*\*\*\*\*@gmail.com as his home e-mail address.

15. On or about February 19, 2019, Defendant Xie's original application was rejected by the United States Army systems for an unknown error, requiring Defendant Xie to report to his recruiting station for an update to the application, which Defendant Xie then signed on or about February 27, 2019.

16. The applications of February 19, 2019 and February 27, 2019 (the "Applications") set forth the penalties for inaccurate or false statements as follows:

[T]he U.S. Criminal Code (title 18, section 1001) provides that knowingly falsifying or concealing a material fact is a felony which may result in fines and/or up to five (5) years imprisonment . . .

17. Defendant Xie answered "Yes" to the Statement of Understanding set forth in both Applications as follows:

I have read the instructions and I understand that if I withhold, misrepresent, or falsify information on this form, I am subject to the penalties for inaccurate or false statement (per U.S. Criminal Code, Title 18, section 1001), denial or revocation of a security clearance, and/or removal and debarment from Federal Service.

18. In Section 29 of both Applications, Defendant Xie answered "No" to the following pertinent question: "[H]ave you **EVER** associated with anyone involved in activities to further terrorism?" (emphasis in original).

19. On or about March 1, 2019, Defendant Xie additionally made the following post on Instagram:

. . . How can you fight against your oppressors without using violence? . . .

There's . . . nothing wrong about being violent if you use it for the right reasons. How come when the enemies such as the US or Israel accuse Islam as being violent, you guys try to water it down? I do not want to compromise with these people. If they say Im a terrorist, then I am proud to become a terrorist.

20. According to Instagram records, on or about April 14, 2019, Defendant Xie provided instruction to Individual #4 as to how he/she could make a financial donation to HAMAS by providing a link to the al-Qassam website, and on or about April 17, 2019, Defendant Xie specifically indicated that the donation page could be accessed by clicking the left button of the website.

April 14, 2019

Individual #4: Does Hamas have good media? I never see much by them.

Xie: I think it's pretty decent.

\*\*\*

Xie: actually let me send you the link to al-qassam's website

Individual #4: Where can I find them?

Okay, is it safe?

Xie: Yeah I'm pretty sure its safe

Xie: I've used it a bunch of times and nothing bad has happened so far

Xie: <https://alqassam.net><sup>4</sup>

Xie: They changed the layout of the website a bit

Xie: If you click the left button, it brings you to their donation page where you can donate via bitcoin

Xie: and the right button is for their main website

Individual #4: Is it actually Hamas site?

Like run by them?

Xie: I'm like 95%+ sure

Individual #4: I wonder if donations actually go to the mujahideen<sup>5</sup> or like the political stuff

Xie: They also have another website, but that's for the political stuff

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<sup>4</sup> As noted above, the armed or military wing of HAMAS is referred to as the Izz al-Din al-Qassam Brigades and has conducted anti-Israel attacks, including suicide bombings against civilian targets inside Israel. United States citizens have died and been injured in the group's attacks. The FBI assesses Xie is referring to this armed/military wing of HAMAS.

<sup>5</sup> Guerilla fighters in Islamic countries, especially those fighting against non-Muslim forces.

Individual #4: Not that I have a lot of money to give

Xie: <http://hamas.ps/en/>

Xie: This is the political page

Xie: I donated a \$100 but that was a while ago lol

Individual #4: Yeah I knew there was a difference

Individual #4: Like from Bitcoin?

Individual #4: IDK how Bitcoin works tbh

Xie: Oh it was through those money transfer things like moneygram

Xie: yeah idk how that shit works its too confusing lol

Individual #4: We have a moneygram station at my work

Individual #4: @ [retail store]

Xie: Oh nice we also had one in [a different retail store] as well

Xie: Though I didn't go to the actual store to send the money

Individual #4: Lol plz say you didn't donate at your work?

Xie: because I didn't know if that would've looked suspicious

Xie: hey just curious why are you sending money to gaza?

Xie: no haha

Xie: I donated online

Xie: but it was still the same money transfer system

Xie: just that I didn't have to deal with a real person

Xie: just typed in the info of where to send it and that's it

Individual #4: Oh like moneygram's website? Lol

Xie: yeah

Xie: actually wait it wasnt money gram but it worked as the same thing

Xie: because it was weird using moneygram

Xie: because I think it would only allow me to send to the west bank for some reason

Individual #4: See idk if I could do it. Like I'd worried if the money actually made it to the mujahideen

Xie: so i had to use a different one

Xie: Yeah that's true

Xie: If it didn't then I guess that's a big oof for me

Individual #4: I feel like things are so crazy over there and so many are corrupt that people would steal the money

Xie: Yeah there are crazy people out there

Xie: I mean the website looks pretty professionally made (it looks better on the computer)

Individual #4: Well I'm sure you will get rewarded in the akhirah [afterlife] for that. You are a good person. I'm sure they need everything they can get

Xie: Thanks

Xie: They also post a lot of new videos

Individual #4: I will have to start looking

Xie: and its hard to find those vids anywhere else, especially on youtube

Individual #4: Yeah they get taken down really quick

Xie: It sucks. Stupid youtube.

21. On or about April 18, 2019, according to Instagram records,

Defendant Xie further instructed Individual #4 on how to make

donations to HAMAS via the Al-Qassam Brigades website. Defendant Xie

noted that the website now allows donations through Bitcoin, and he (Xie) stated that he would send \$20 via the website as a test transaction. According to Instagram records, the following conversation with Individual #4 occurred:

April 18, 2019

Xie: on the hamas website theres like a qr code or something like that that shows where to donate to

Individual #4: It's arrraBbbiicc [sic]

\*\*\*

Xie: oh okay i think i know how it works

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Oh! I found out how to translate the donation page to english...ok ill send you pics...

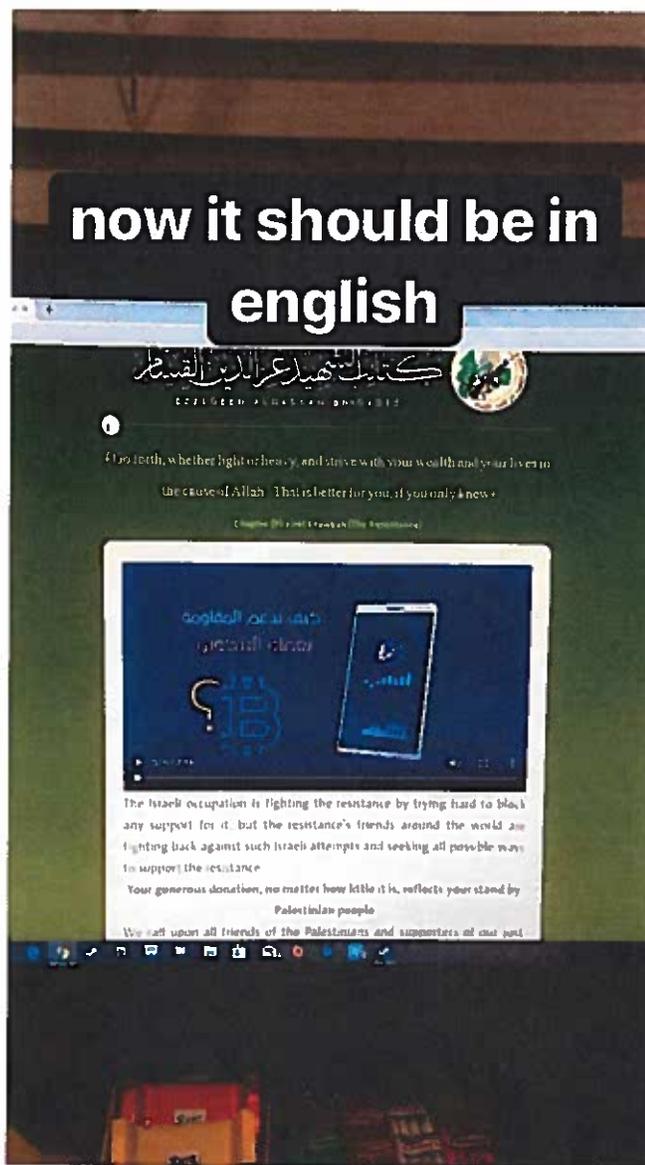


Individual #4: Wth I thought u did this before

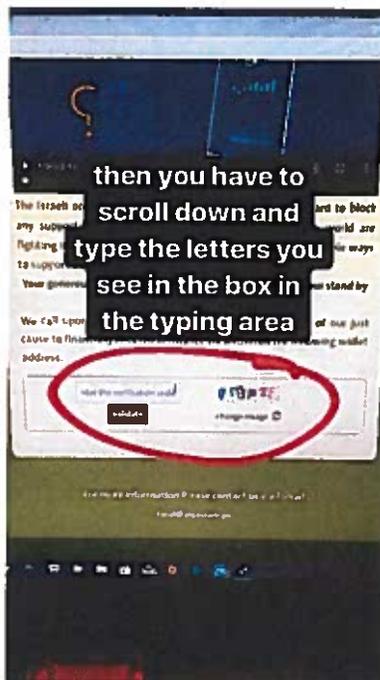
\*\*\*

Xie: Yah I donated before but that was before they announced their bitcoin method...





["Ezzedeen AlQassam Brigades" . . . "The Israeli occupation is fighting the resistance by trying hard to block any support for it, but the resistance's friends around the world are fighting back against such Israeli attempts and seeking all possible ways to support the resistance. Your generous donation, no matter how little it is, reflects your stand by Palestinian people."]



Individual #4: Well thanks for sending those. I'll have to look when I get my laptop out  
Still seems super complicated lol

Xie: No problem! If you still need help I'll try to assist even though I don't know much either lol . . .  
I'm going to make another donation when I get my tax return money  
So I'll tell you how it goes

\*\*\*

Individual #4: To Hamas again?

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Xie: Yah... actually shit im just going to donate \$20 really quick to see if it works

Individual #4: Big spender

Xie: ive been using my savings account even though my parents would slaughter me if i found out

\*\*\*

Individual #4: Is Bitcoin anonymous?

Xie: yah... i think thats why hamas is using it now because money transfer is not that anonymous

22. According Instagram records, Defendant Xie further instructed that Individual #4 could donate via Bitcoin, and stated that he had previously donated \$100. On or about April 26, 2019, according to Instagram records, Defendant Xie informed Individual #4 that HAMAS may use his money for food for the soldiers or for ammunition. On or about April 26, 2019, Defendant Xie sent 0.00332541 BTC (\$17.00 USD) using Coinbase, a cryptocurrency platform, to a HAMAS-controlled Coinbase wallet to support the Palestinian resistance.<sup>6</sup>

23. On or about April 20, 2019, FBI surveillance observed Defendant Xie and an individual believed to be his brother outside of the Trump Tower building located at 725 5<sup>th</sup> Avenue in New York City.

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<sup>6</sup> As a test transaction, Defendant Xie sent approximately \$20, but a transaction fee of approximately \$3 resulted in a total donation amount of approximately \$17.

24. Shortly thereafter, according to Instagram records, Defendant Xie posted two photos to his Instagram account – one with the words “I want to bomb Trump Tower” imposed over the Trump Tower building image, and the other with the words “[S]hould I bomb Trump Tower,” a “Yes/No” poll, and an emoji of a bomb imposed over the Trump Tower building image.

25. In response to the posting of this photograph and poll, an individual in Defendant Xie’s Instagram chat group questioned whether Defendant Xie was on the FBI watch list, and another individual stated “[Defendant Xie’s Instagram name]’s doing his typical terrorist bs again.”

26. Defendant Xie responded to the comments with the following posts:

Donald Trump, he should be hung from the gallows! ... Okay so I went to NYC today and passed by Trump Tower, then I started thinking about bombing it and I was imagining that the explosion would kill Trump and then I started laughing hysterically... shit I forgot to visit the israeli embassy in NYC...i want to bomb this place along with trump tower.

27. Defendant Xie further made the following additional posts on Instagram:

April 23, 2019

Xie: I want to shoot the pro-israel demonstrators . . .  
Maybe I should rent the truck of peace

\*\*\*

You dont [sic] need to learn martial arts to fight  
when you can get a gun  
and shoot your way through  
or use a vehicle  
and ram people

April 25, 2019

Xie: Because in the end they will know that I was right all along  
Even if that means I have to kill people to prove it . . .  
All you need is a gun or vehicle to go on a rampage  
I plan on killing people after my first task<sup>7</sup>

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<sup>7</sup> Based on my training and experience, I believe that the “first task” likely refers to Defendant Xie’s enlistment and training in the United States Army.

I do not care if the security forces come after me, they will have to put a bullet in my head to stop me

April 26, 2019

Xie: Someone needs to get a truck filled with explosives and blow up the Coachella event  
Watch their blood and dead bodies litter the streets