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

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|--------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA | : | Hon. Cathy L. Waldor             |
|                          | : |                                  |
| v.                       | : | Magistrate. No. 20-9451 (CLW)    |
|                          | : |                                  |
| MARIA BELL,              | : |                                  |
| a/k/a "Maria Sue Bell"   | : | <b><u>CRIMINAL COMPLAINT</u></b> |

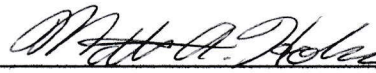
I, Matthew Hohmann, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with 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.

  
Matthew Hohmann, Special Agent  
Federal Bureau of Investigation

Sworn to before me, and  
subscribed to in my presence

November 24, 2020 at  
Newark, New Jersey

HONORABLE CATHY L. WALDOR  
UNITED STATES MAGISTRATE JUDGE

  
For Cathy L. Waldor  
Signature of Judicial Officer

**ATTACHMENT A**

**Count One  
(Concealment of Terrorist Financing to a Designated Foreign  
Terrorist Organization)**

From in or about February 2018 through November 2018, in Morris County, in the District of New Jersey, and elsewhere, defendant

MARIA BELL,  
a/k/a “Maria Sue Bell,”

did knowingly conceal or disguise the nature, location, source, ownership, or control of material support or resources, or any funds or proceeds of such funds, knowing or intending that the support or resources were provided to a designated foreign terrorist organization, that is, the al-Nusra Front (“ANF”) and Jabhat al-Nusra, also known by other aliases including Hay’at Tahrir al-Sham (“HTS”), in violation of section 2339B of this title.

In violation of Title 18, United States Code, Section 2339C(c)(2)(A).

## **ATTACHMENT B**

I, Matthew Hohmann am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since in or about 2010. I am currently assigned to the Joint Terrorism Task Force ("JTTF") and have worked on investigations relating to international terrorism and violent extremists since becoming a Special Agent. My experience as a Special Agent has included the investigation of cases involving the use of 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 with the facts set forth herein based upon my personal knowledge and observation, my training and experience, conversations with other law enforcement officers and witnesses, and the review of documents and records. 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. Rather, I have set forth only those facts that I believe are necessary to establish probable cause that Bell concealed the provision of material support or resources to a designated foreign terrorist organization in violation of Title 18, United States Code 2339C. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part. Dates of events in this affidavit are asserted as having occurred on or about the asserted date.

### **The Designated Foreign Terrorist Organization: The al-Nusrah Front and Hay'at Tahrir al-Sham**

1. On or about May 31, 2018, the United States Secretary of State amended the designations of an existing Foreign Terrorist Organization ("FTO") and Specially Designated Global Terrorist ("SDGT"), the al-Nusrah Front ("ANF"), also known as Jabhat al-Nusrah, to include Hay'at Tahrir al-Sham ("HTS") and other aliases. ANF was included as an FTO and SDGT since at least December 11, 2012<sup>1</sup>. At all times relevant to this complaint, ANF was designated as an FTO.

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<sup>1</sup> The United States Secretary of State designated al-Nusrah Front (ANF), also known as Jabhat al-Nusrah, also known as Jabhet al-Nusra, Jabhat fatah al-sham, also known as The Victory Front, also known as Al-Nusrah Front for the People of the Levant, also known as Al-Nusrah Front in Lebanon, also known as Support Front for the People of the Levant, and also known as Jabaht al-Nusra li-Ahl al-Sham min Mujahedi al-Sham fi Sahat al-Jihadb as an FTO under

2. These aliases were added to ANF's designations as a FTO under Section 219 of the Immigration and Nationality Act, and as a SDGT under Executive Order 13224<sup>2</sup>. In January 2017, ANF had launched the creation of HTS as a vehicle to advance its position in the Syrian uprising and to further its own goals as an Al-Qaeda<sup>3</sup> ("AQ") affiliate. Since January 2017, ANF has continued to operate through HTS in pursuit of these objectives. To date, HTS remains a designated FTO.

3. HTS operates in Northwest Syria, primarily in Idlib Province, where it is fighting the Syrian regime and its allies. HTS members have a historical relationship with another Syria-based group, Hurras al-Din ("HAD"). HAD, which operates within HTS-controlled Idlib Province, is comprised of AQ veterans in Syria and is dedicated to conducting attacks against the United States and other western nations.

4. In addition, HTS has a relationship with another militant group operating in Syria, Ahrar al-Sham (AAS). Since 2015 AAS has maintained a longstanding military partnership with HTS to fight against the Syrian regime, though the two groups differ on their long-term goals in Syria. More specifically, AAS only seeks to establish an Islamic State within Syria while HTS and other AQ-aligned groups seek to pursue global jihad. Despite joint efforts against Syrian regime forces, AAS and HTS have consistently fought one another over territory and border crossings in recent years. AAS presents itself as a moderate alternative to HTS in northwest Syria and now fights on behalf of the Turkish-backed National Liberation Front ("NLF"), a coalition formed in 2018 by other regime opposition groups in an attempt to counter HTS control. NLF and HTS reached an agreement earlier this year in which NLF agreed to recognize the HTS-backed administration in northwest Syria in exchange for joint operations. The groups have been fighting together against regime forces since then.

5. To gain supporters, HTS, like many other terrorist organizations, spreads its message using social media, Internet platforms, and email. Using these platforms, HTS has disseminated a wide variety of recruiting materials and propaganda through social media, which includes photographs and videos

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Section 219 of the Immigration and Nationality Act and as a SDGT under section 1(b) of Executive Order 13224.

<sup>2</sup> "Amendments to the Terrorist Designations of al-Nusrah Front" <https://www.state.gov/amendments-to-the-terrorist-designations-of-al-nusrah-front/>.

<sup>3</sup> Al Qaeda("AQ") has been designated by the Secretary of State as a FTO And SDGT since October 8, 1999, and has the following aliases to the FTO listing: "the Base," the Islamic Army, the World Islamic Front for Jihad Against Jews and Crusaders, the Islamic Army for the Liberation of the Holy Places, the Usama Bin Laden Network, the Usama Bin Laden Organization, Islamic Salvation Foundation, and The Group for the Preservation of the Holy Sites. To date, AQ remains a designated FTO.

depicting HTS activities, as well as audio and video lectures by members of HTS and members of other Islamic extremist organizations.

6. HTS is currently led by Abu Mohammad al-Jolani (“Jolani”), the founder of ANF. According to open source information, Jolani was a close associate of Abu Musab al-Zarqawi, the former leader of al-Qaeda in Iraq who was killed in a US airstrike in 2006. In 2008, US forces arrested Jolani and detained him in Camp Bucca in Southern Iraq. Following his release in 2008, Jolani worked alongside Abu Bakr al-Baghdadi, the then-head of al-Qaeda in Iraq, before branching off to form ANF in early 2012.

### **Overview**

7. Defendant Maria Bell, a.k.a. “Maria Sue Bell” (“Bell”) is a 53 year-old resident of New Jersey. At all relevant times in this Complaint, Bell was a citizen of the United States. Beginning at least as early as February of 2017, Bell, operating in and around Hopatcong, New Jersey, used mobile applications, including but not limited to Encrypted Applications and Social Media, to communicate with and provide advice to HTS members and to facilitate money transfers to HTS. Bell also used the Encrypted Applications to provide other information which could support acts of terrorism by HTS. For example, Bell provided guidance to HTS members on matters of operational security, communications, firearms purchases, and other information, often citing her professional experience, including her specialized military training on guns while in active duty in the United States Army, as well her background in the Army National Guard.<sup>4</sup> Further this investigation shows that between in or about February 2017 and November 2018, Bell regularly used Encrypted Applications to communicate with one HTS member with whom Bell had an on-line relationship. It shows that Bell provided this HTS Member advice on the purchase of a weapon and ammunition, planned to meet him in Turkey, and sent money to him via intermediaries using Western Union (subsequent to providing him advice on the purchase of weapons and ammunition). Further the investigation shows that User 1 is an HTS fighter located in Syria.

8. This affidavit delineates evidence of: (A) Bell’s use of Encrypted Applications to communicate with this HTS fighter; (B) Bell’s use of Encrypted Applications to communicate with this HTS fighters about firearms purchases and nomenclature; (C) Bell’s plan to meet with this HTS fighter in Turkey; and

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<sup>4</sup> Bell was in the Army National Guard from on or about November 9, 1984 through on or about June 23, 1985 and on Army Active Duty from on or about June 24, 1985 through January 31, 1986. Bell received an Other Than Honorable (OTH) Discharge deemed Good for Service in lieu of a Court Martial. OTH discharges can be accepted in-lieu of court-martial proceedings at the service-member's request. Persons facing OTH are guaranteed, by the Uniform Code of Military Justice, the right to have their discharge heard by an administrative discharge board, which is similar to a court-martial but is not a public forum.

(D) Bell's transfer of money to intermediaries who received funds on behalf of this HTS fighter.

**A. Bell's Use of an Encrypted Applications to Communicate with HTS Fighter (User 1)**

9. Based on my involvement in this investigation, conversations with other law enforcement officers, and review of FBI reports, I have learned that Bell used mobile applications, including but not limited to Encrypted Applications, to communicate with members of HTS and other individuals fighting in Syria against the Syrian regime. In those communications Bell, among other things, disseminated guidance, including but not limited to guidance concerning operational security issues, firearms purchases, and military knowledge to foreign fighters and HTS members. Additionally, Bell used mobile applications, including Encrypted Applications, to discuss concealing the nature, location, and ownership of payments by using intermediaries to receive financial support for HTS.

10. As set forth in greater detail below, Bell often communicated over two particular Encrypted Applications, "Application-1" and "Application-2." These applications allow users to send and receive messages referred to as "chats," which are private communications amongst their participants. Bell used Application-1 and Application-2 to communicate with numerous apparent HTS supporters. In these chats Bell revealed her allegiance to HTS, provided counsel on operational and strategic issues and discussed details of payments she transmitted to an HTS member.

11. One HTS member with whom Bell communicated frequently with on Applications-1 and Application-2, and transferred money to, was User 1. There were thousands of chats between Bell and User 1 on these applications between February 2017 and November 23, 2018. Based on my training and experience, including the review of the content of these chats, it is clear that Bell supported HTS. It is also clear that Bell believed that User 1 was a member of HTS, had an on-line relationship with him, planned to meet him in Turkey, provided him advice on weapons and ammunition, and provided him money. Further, the investigation shows that User 1 is an HTS fighter located in Syria. Eighty chats between Bell and User 1, as well as additional evidence that establishes his identity, are provided below.<sup>5</sup>

12. First, on February 20, 2017, Bell used Application-2 to communicate with User 1. This communication evidences that Bell (a) believed

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<sup>5</sup> Some portions of chats described herein occurred in Arabic; an asterisk denotes all portions translated from Arabic into English. The descriptions and/or translations of these chats are based on preliminary English translations and summaries. Because these translations and summaries are partial and preliminary, they are subject to revision.

User 1 had pledged to HTS; (b) planned to visit him in Syria; and (c) encouraged him to fight in Syria. It also shows that User 1 is ready to fight in Syria against Assad's regime.

Bell: Think beyond the immediate battles. What happens when these battles end?

User 1: Aleo was in the west of the city of Aleppo battles

Bell: Right now we think of friends who are fighting. It might be Allah's will that they die or survive.

User 1: Yes

Bell: But once all the battles stop, think about life at that point. This is where I am thinking.

Bell: How do I protect you then?

Bell: This is why speaking to Abu<sup>6</sup> is extremely important now.

User 1: Right

Bell: So please help me reach him.

User 1: But I did not accept Abu Now think about how Ardjao control of Aleppo

Bell: Abdussamad has received my messages in his Facebook account. But I cannot tell if he has read them.

Bell: You did accept Abu. You pledged to HTS.

User 1: Responding to enter Aleppo again

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<sup>6</sup> Based on my training and experience, I believe that the use of "Abu al Abd" is a reference to Abu al-Abd Ashidaa, who joined HTS at its formation and was responsible for "leading defensive forces in the countryside of Aleppo," according to an interview between Abu al-Abd Ashidaa and political analyst Aymenn Jawad Al-Tamimi conducted in April 2020. Furthermore, a review of Bell's Social Media Account -1 indicated multiple messages referencing "Abu al-abd," with one message from April 7, 2017 to an identified user saying "Support HTS. U need Abu al-abd Ashada 2 lead rebels into peace. Has pragmatism, grace. Pls make a deal." Ashidaa left HTS in September 2019 after HTS imprisoned him for publicly speaking against the group. See: <http://www.aymennjawad.org/2020/04/interview-with-abu-al-abd-ashidaa>

User 1: do you understand what IAM saying

Bell: Yes, I know. I can only read about half the news because I cannot translate it all.

Bell: Your face is known because of [identified person]. And your age make you a target.

Bell: [Bell quoted User 1 message] "Abdullah 2: do you understand what IAM saying" Tell me your thoughts please"

User 1: The Mujahideen are planning directing themselves to fight the battles in Aleppo👊👊

Bell: I understand. And you wish to join them again...

User 1: what do you want

User 1: ?

Bell: I am trying to very hard to save you.

Bell: My bigger fear is not your death but the uncertainty of what life will be like after the war ends.

Bell: You ask what I want. I know what I want, it is a matter of what Allah allows me to have.

User 1: Yes

Bell: If Assad wins, mujahideen will be persecuted again.

User 1: 👊

Bell: If Assad wins, I cannot get a visa into Syria. I cannot come to you.

Bell: That is my biggest fear. That I will be unable to save you from arrest.

User 1: We do not defeat we win or die😊

User 1: 🖐

Bell: I understand. I would rather see you die.

Bell: I will ask you two questions please....

User 1: God willing, we rely Ola power of Allah

User 1: ?

Bell: 1. Are you ready to fight in front line with other fighters?  
You are no longer young child like you used to be.

Bell: It will be frightening. But I am with you.

User 1: Y8

User 1: Yes

User 1: I am ready

Later in this same communication, Bell tells User 1 that he must tell Bell “the day before you start to fight so I can be ready in my heart,” and that “you have my blessing to go fight”. Bell further stated that “I know many military things and medicine. Allah pushes me to help.”

13. Second, on or about February 11, 2017, Bell used Application-2 to communicate with User 1 about the situation in al-Bab. Al Bab is a northern town in Syria that, in February 2017, was the site of fighting between ISIS and pro-Syrian forces, as ISIS had occupied the town. This conversation evidences that Bell believed that (1) HTS leaders were brave; (2) after al-Bab falls the U.S. would target HTS; (3) User 1 was a member of HTS, and (4) due to his involvement with HTS, User 1 was at high risk for arrest.

Bell: The leaders in HTS are the bravest men in Syria today.

Bell: We will hard times coming. After al-Bab falls, I believe my government will target HTS. There are already American drones flying over Idleb

Bell: So if we ever lose contact, you must believe we will find each other again. I will not stop trying....

User 1: Yes

Bell: So you understand why I wish to help Abu? It is important for me....I help them, I save you....

Bell: You are member of HTS. You are at high risk for arrest soon.

Bell: You are safe now.... Hopefully politics change....and you can stay safe....

14. Third, on or about March 11, 2017, in an exchange with User 1 on Application-2, Bell showed her support for HTS and User 1 by praising both HTS fighters and User 1.

Bell: Did you wish to tell me something about HTS?

User 1: I love hts [emoji]

Bell: Yes, I know you do. These fighters are good men

User 1: Yes

Bell: They are brave and skilled

User 1: I am too..?

Bell: Yes, you are. You survived Aleppo. You now have the chance for new skills.

15. Fourth, on or about April 6, 2017, Bell in a communication between Bell and User 1 on Application-1, after discussing U.S. support for the Syrian regime, which HTS and other groups were fighting at the time, User 1 stated “we” will take revenge on the U.S. if the U.S. strikes airports in Syria. The affiant notes that in early 2017 ISIS fighters had control over the airport in Aleppo, Syria and there was ongoing fighting backed by countries that supported the Syrian regime to secure the airport. I interpret this as User 1’s acknowledgement that he is part of a group that is fighting the regime, and supports retaliation against an U.S. action against ISIS and rebel forces who are fighting against the regime.

User 1: If you want to hit the Syrian airports, we will return to revenge within New York

Bell: Do you realize what will happen to me?

User 1: 😊

Bell: Think dear..... All of us who help Syria will be in danger.

Bell: I live very close to New York and I am connected on [REDACTED] to many revolutionaries.

User 1: 🖐

Bell: Now think... Would I be called to help of left to be jailed?

Later in the same communication, Bell references what I believe is the 9/11/2001 attack on New York, and opines that “Americans have little idea of the consequences.”

Bell: Do you remember the big attack in New York?

Bell: That was a long time ago. But that stays in memory for many people and makes them suspicious of us.

User 1: Yes

User 1: I remember

Bell: It killed many people and so many Americans how hate us.

Bell: It was sad but Americans have little idea of consequences

User 1: 🖐️

User 1: Yes

Bell: So happily the West fights with words and money

Bell: But when guns become involved, it gets ugly and bloody very fast

16. Fifth, on or about August 6, 2018, in a communication between Bell and User 1 on Application-1, Bell told User 1 that he had done one thing he wished: “to rejoin HTS and be active again.” Bell then told User 1 that she will pray he never fights but she will bless him if he does. In that same chat, chat Bell told User 1 that she “like[d] that video”<sup>7</sup> and the “fight for our faith.” This conversation shows that Bell believes User 1 had rejoined HTS and is an active member of HTS. Further, based on my involvement in this investigation, and my training and experience, I believe “fight for our faith” refers to the resistance movement and jihad against the Assad government by rebel forces to include HTS, and that Bell is articulating her support of this movement

17. Sixth, on or about between August 16, 2018 and August 17, 2018, Bell, on Application-1, provided User 1 with a link to an article written by an American Journalist that discussed, among other things, HTS. The author wrote regularly on the situation in Syria and on countering terrorism and violent extremism, including HTS and other groups. Bell asked User 1 to block

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<sup>7</sup> The content of the video that Bell references includes User 1 holding and firing weapons.

access by American writers to fighters and faction leaders as they write articles that influence public opinion. This conversation shows that Bell believed User 1 was part of and/or had direct access to HTS leadership, and that User 1 had the ability to limit journalist's interviews of HTS fighters.

Bell: <https://warontherocks.com/2018/08/the-urgency-of-idlib-the-impending-regime-offensive-and-the-delicate-balance-in-syrias-northwest/>

Bell: Dear one, you must listen please. Please pass this article onward into HTS leadership. Although it is in English, it is important that it is seen and the context of the article understood.

Bell: I had asked you before to help block access by these American writers. They interview fighters and faction leaders to write these articles for American politicians. They are influential on public opinion. The government uses them to help spread propaganda about the factions so that the public will support the government in attacking Islam.

Bell: This man is named Charles Lister. Ahrar has spoken to him many times and he now writes that he speaks to fighters in HTS.

Bell: This man is not a friend and HTS must not speak to him. He is gathering information that will be used against HTS. It is important in protecting Jolani that trust is kept.

Bell: I cannot say enough how important it is not to allow anyone to speak. This man now has mobile numbers and names of men inside HTS.

.....

User 1: Where does this man live?\*

18. Seventh, on or about November 2, 2018, on Application-1, Bell and User 1 discussed the leadership of HTS, with User 1 informing Bell that he met with HTS leaders.

User 1: Today met with leaders of Hts and Abu Al Abd<sup>8</sup> \*

Bell: God bless our faith and our men

Bell: What came of the meeting dear? Are you happy?

User 1: Yeah dear

User 1: That they are indeed men there was some leaders we was some leaders we were together in Aleppo, session was good and we listened to the conditions of solving the problems occurring with Al-Zinki<sup>9</sup>\*

19. Eighth, on or about November 3, 2018, on Application-1, Bell and User 1 discussed an individual named Jolani. As delineated above in paragraph 6, HTS is currently led by Abu Mohammad al-Jolani (“Jolani”), the founder of ANF. This conversation evidences that Bell intends to help User 1 succeed with his responsibilities as a trusted man in ANF/HTS circles.

Bell: Good morning dear one.

Bell: I slept late and then had a long phone call. I interviewed an important man in America who speaks about Syria. He lived in Syria and attended university there for a while. I will write an article about him and publish it in social media.

Bell: I pray that a good solution to the problems with Zinki can be found. Jolani needs cooperation and peace so he can protect the people in the camps.

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<sup>8</sup> As described more fully in Footnote 9, “Abu al Abd” is a reference to Abu al-Abd Ashidaa, who joined HTS at its formation.

<sup>9</sup> Based on my training and experience, I understand “Zinki” is a reference to Nour al-Din al-Zinki, a Syrian rebel group based in west Aleppo that dissolved in 2019 following a defeat to HTS. Sheikh Tawfiq Shihab al-Din, the leader of Nour al-Din al-Zinki until its 2019 dissolution, detailed Nour al-Din al-Zinki’s rise and fall during an interview with political analyst Ayemnn Jawad Al-Tamimi. According to al-Din, Nour al-Din al-Zinki joined HTS when “Jabhat al-Nusra formed Hay’at Tahrir al-Sham” on the “foundational condition” the HTS should not fight other factions or members of the Free Army. Nour al-Din al-Zinki separated from HTS after HTS insisted on striking another Syrian rebel group, Ahrar al-Sham. HTS later defeated Nour al-Din al-Zinki and absorbed its weapons, strongholds, and resources. Reference: <http://www.aymennjawad.org/2020/01/the-history-of-harakat-nour-al-din-al-zinki>

Bell: You are a trusted man now in their circles and I will help you succeed with that responsibility.

20. There is also evidence that User 1 is an active fighter in Syria that includes the following:

21. First, a 2016 video, produced by On the Ground News (“OGN”) in Syria, reporting on the question of “who are the fighters of East Aleppo.” This video features a young man, identified by name as User 1, who identifies himself as member of Ahrar al-Sham. In 2016, Ahrar al-Sham, known as the “Islamic Movement of the Free Men of the Levant”, was a militant group that was fighting against the Assad Regime in Aleppo. In this video User 1 explains his tactics and strategy for fighting the Syrian Government, and also highlights the difficulties of life in Aleppo. He is shown actively fighting and firing a weapon in this video.

22. Second, a second 2016 video produced by OGN in which an OGN reporter is reporting from Eastern Aleppo. He interviews the same individual, who self identifies as User 1 by name, about fighting that has occurred in Bustan al-Qasr, a city which, at the time, was the last crossing point between the rebel and regime-held sides of Aleppo. In this video User 1 is in military uniform and discusses an attack by Syrian forces and notes that they (the anti-regime fighters) retaliated by firing missiles.

23. Third, open source information from a public Facebook profile page of an account with the display name “Hassan Nasser Al-Hamoud” that includes (1) a September 10, 2017 Facebook posting featuring a video of an individual believed to be User 1 in military style clothing and (2) a May 22, 2018 posting from this same account featuring the first OGN interview and video described above. This information was a result of an FBI search of open source information. The FBI believes that several users are using the “Hassan Nasser Al-Hamoud” account, including User 1. The FBI discovered this account when an individual believed to be User 1 commented on Bell’s Facebook post. A subpoena for subscriber information on this account has been issued.

24. Fourth, an August 1, 2018 communication on Application-1, in which User 1 provided Bell a scan of his photo identification which had the name and a picture of User 1. This person in this photo identification matches the individual in the OGN interview and the other photos referenced below.

25. Fifth, multiple open source photos of an individual who self identifies or is identified as User 1; and

26. Sixth, numerous photos of User 1 that that Bell received on Application-1. The FBI has analyzed all of these items and assesses that they are all pictures or videos of the same person, User 1.

27. In summation, the messages between Bell and User 1, as well as the other information above establishes that Bell supported HTS, believed that User 1 was a member of HTS. Further the messages, as well as the information detailed above, establish the status of User 1 as an HTS member and fighter.

**B. Bell's use of Application-2 to provide advice regarding firearms and ammunition**

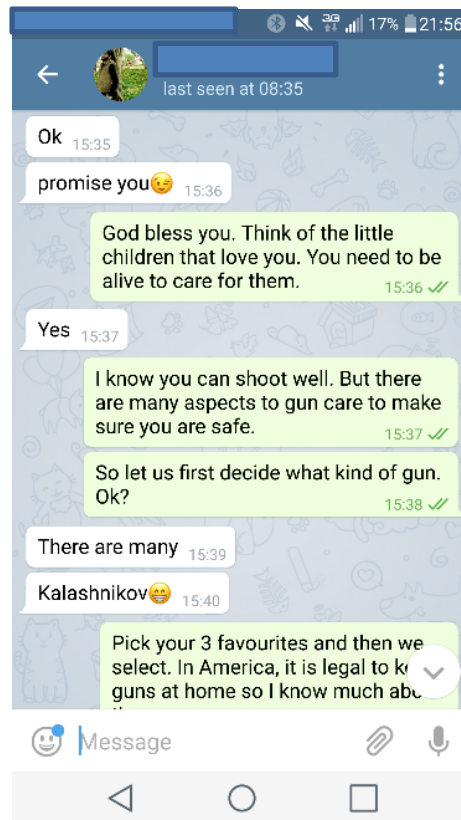
28. Bell also used Application-2 to communicate with HTS members about firearms purchases, and to facilitate financial payments to HTS for the purchase firearms. Provided below is a communication between Bell and User 1 on Application-2 that occurred on or about March 8, 2017. In this communication Bell provided advice to User 1 regarding the purchase of a firearm and ammunition for User 1. More specifically, Bell and User 1 discussed the cost and type of weapon that would be good for User 1 and sent to each other photos of six different weapons. This conversation indicates that Bell is intending to provide finances for a weapon for User 1, but is concerned about the cost of the weapon User 1 will buy, with Bell stating that one of the guns "is very expensive and remember my limits on money. Half must be saved for new house." The following are messages and screen shots of these communication between Bell and User 1 on Application-2:

Bell: I know that you can shoot well. But there are many aspects to gun care to make sure you are safe.

Bell: So let us decide what kind of gun. Ok?

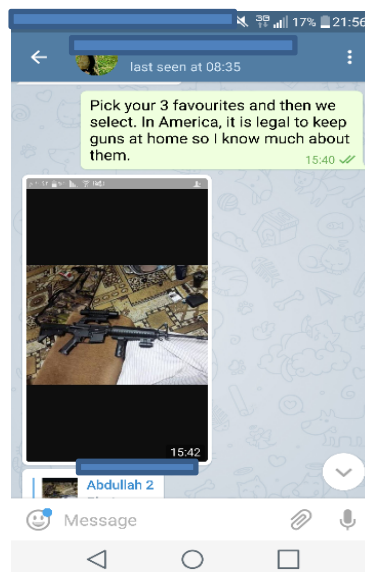
User 1: There are many

User 1: Kalashnikov [emoji]



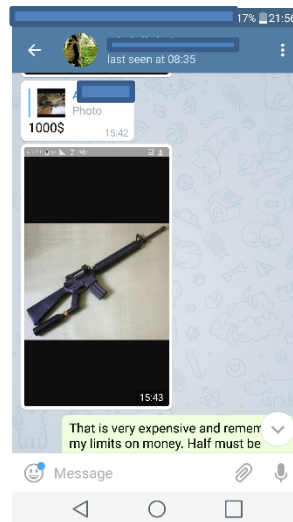
Bell: Pick your 3 favourites and then we select. In America, it is legal to keep guns at home so I know much about them.

User 1:



User 1: 1000\$

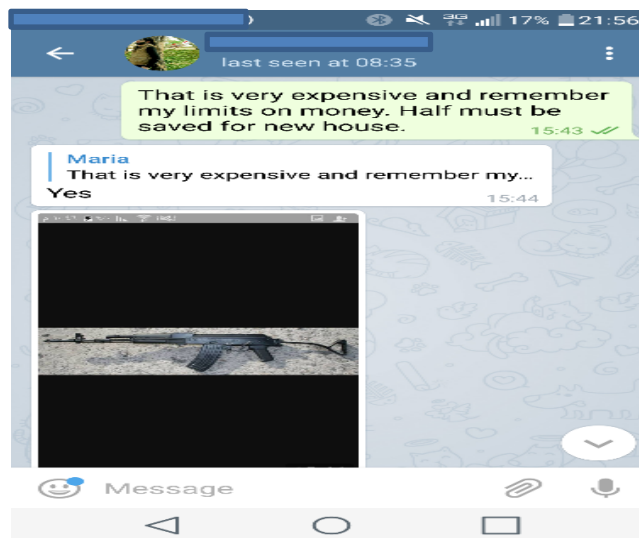
User 1:



Bell: That is very expensive and remember my limits on money. Half must be saved for new house.

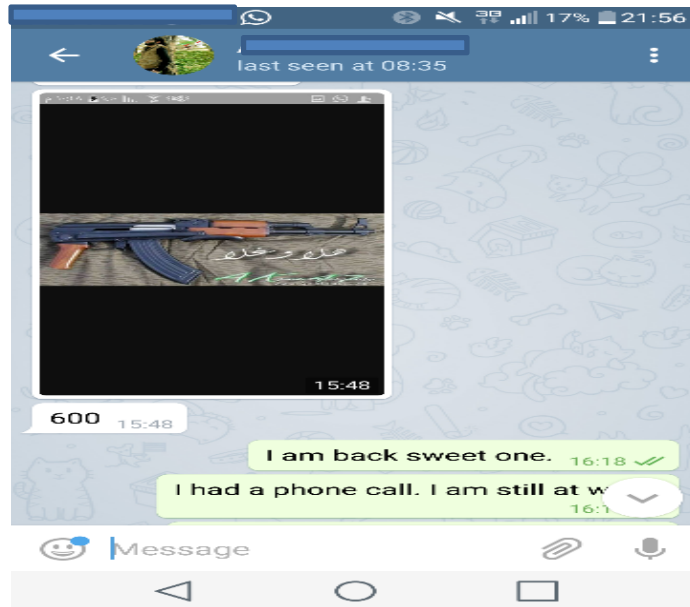
User 1: Yes

User 1:



User 1: 700\$

User 1:



User 1: 600

In the same Application-2 chat thread, Bell begins to talk about ammunition:

Bell: The big part of the decision now is about ammunition.

Bell: If these guns are readily available then 7.62 rounds are also available.

Bell: I will ask you to check on getting ammunition for smaller weapons. Handguns instead of this.

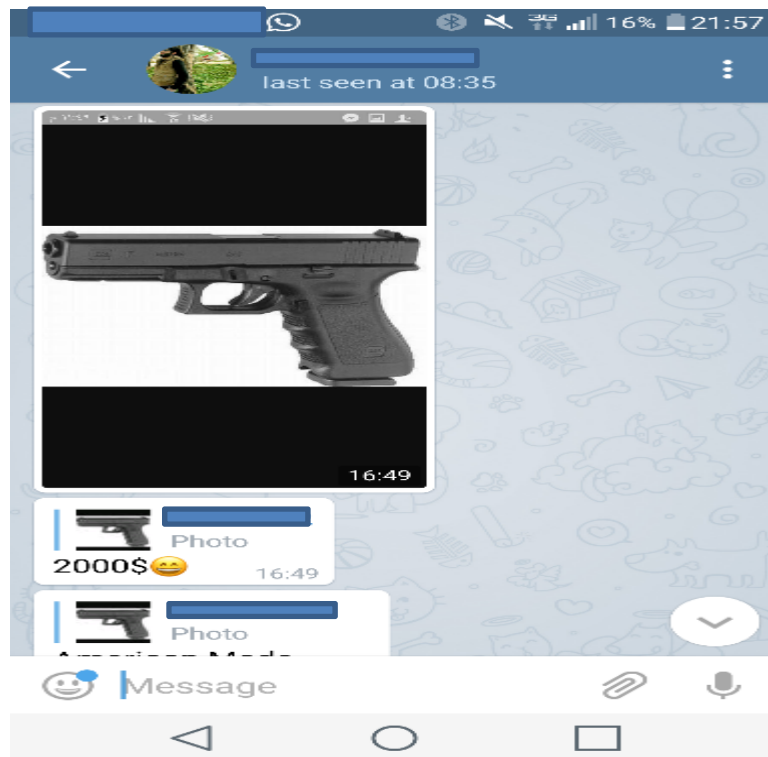
Bell: The rounds are small compared to that of the larger gun.

Bell: There are 4 sizes, measured in millimeters. 9, .45, .357, .40

Later in the Application-2 chat thread, Bell asks if User 1 can find out about prices for handguns:

Bell: Can you find out prices in handgun?

User 1:



User 1: 2000\$ [emoji]

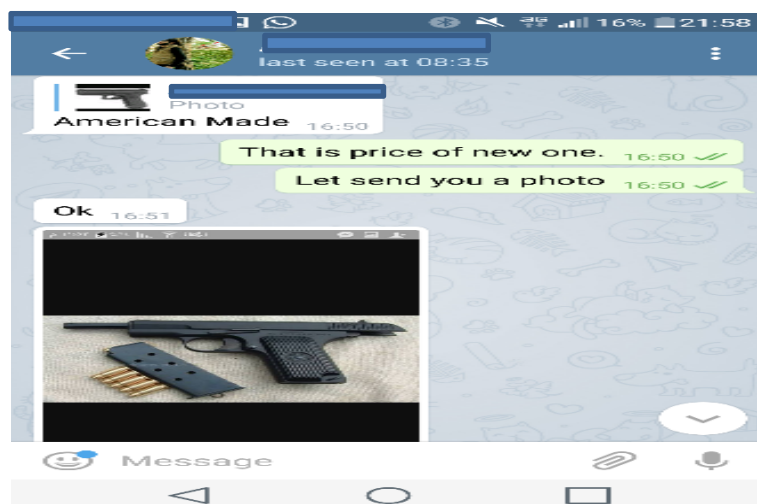
User 1: American Made

Bell: That is price of new one.

Bell: Let send you a photo

User 1: Ok

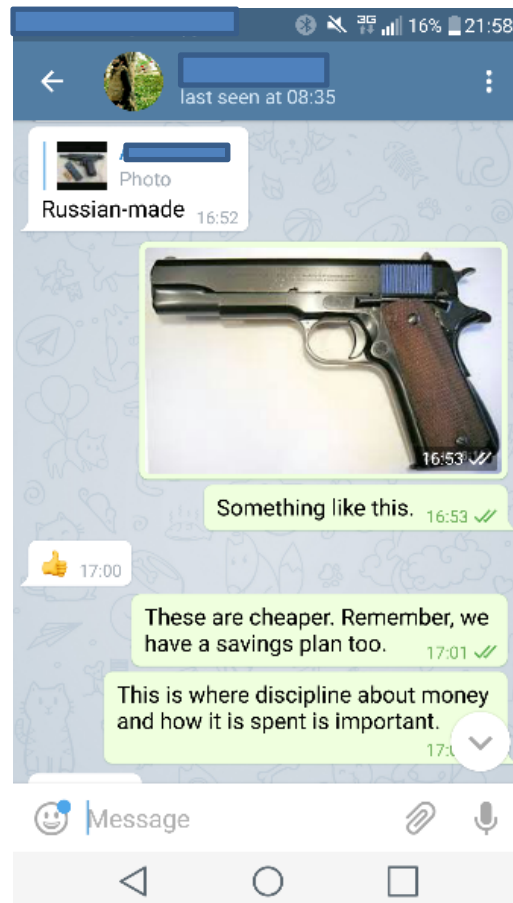
User 1:



User 1: 600\$

User 1: Russian-made

Bell:



Bell: Something like this.

Bell: These are cheaper. Remember, we have a savings plan too.

Bell: This where discipline about money and how it is spent is important.

### **C. BELL's PLANS TO MEET USER 1 IN TURKEY**

29. In addition to the above, Bell's chats, as well as her attempted travel to Turkey, indicate that Bell intended to travel to Turkey in November 2018 to meet with User 1.

30. On or about November 20, 2018, Bell and User 1 discussed her upcoming planned travel to Turkey on Application-1.

User 1: Don't worry, my dear\*. We will pay together if we can get a house

Bell: Sometimes I am lost because I feel lonely here. Life is hard in Syria but you have al-Julani and most people hate him here. It is hard to feel alone. I wish I can tell him a lot of things. I feel as if I am suffocated because I cannot say those words\*

Bell: 

User 1: Yeah dear

User 1: I understand your situation but don't worry\*

User 1: If I succeed to cross into Turkey this time, it will be a good opportunity

Bell: I pray that is so dear. I expect to arrive Saturday at dusk.

31. On or about November 21 and 22, 2018, Bell and User 1 have a second chat on Application-1 regarding potentially meeting in Turkey.

User 1: My dear, I told you my condition before. You never meet any of my relatives.\*

User 1: Dear, I've told you before, and now you never meet with my relatives

Bell: My dear, stop worrying. This trip is exhausting enough. I love you very much but it is hard for me to accept how you direct my life. I am an independent woman in America. If I was not the woman I am, I wouldn't be able to support you.\*

Bell: I don't want to say it but I have my own program in Istanbul. I am there for writing after all. There is a guide from Doha who thinks that I am a very good journalist\*

Bell: I am happy that we are one but I feel sorry that you cannot trust me more. You suffocated me. You have a family and you will never understand

how painful you make life for me. I need a family too.\*

Bell: Good night dear. I hope we have a better day tomorrow.

User 1: My dear, your words hurt me. You are accusing me of mistrust\*

User 1: I will stop my trip\*

User 1: Do what you see good for you 😊\*

User 1: However, my dear, don't forget and I always tell you that we both are like number one and you know that I love you.\*

Bell: Dearest one, you misunderstand me but I cannot correct that. You brought me to Islam and introduced me to a place and people where I am peaceful and happy.

Bell: Then you deny me speaking to anyone and I rarely see Syria now. Perhaps you did not understand how painful this denial has been. I need what you have and being alone hurts me.

Bell: I have learned to adjust to the isolation but it is too hard some days. Yesterday was one of those days and I said what I did out of the pain.

Bell: If you choose not to come to a Turkey because I upset you, think about the upset you brought to my family life here. I have put you ahead of my own needs and have endangered my finances to assist you.

Bell: But you are much loved by me, we are one.

32. Moreover, Bell did attempt to travel to Turkey in November 2018. More specifically, on or about November 23, 2018, Special Agents of the FBI made contact with Maria Bell at a New York City Airport. After being made aware of the identities of the agents, Bell agreed to be interviewed. Bell admitted that she was planning to travel to Turkey on that date, and provided

an airline ticket showing an airline ticket departing New York City and arriving in Istanbul, Turkey on November 24, 2018. Bell was denied boarding.

33. More recently, Bell made round trip travel reservations to depart from a New York City Airport on November 25, 2020. This reservation was for a flight to Egypt, with a final destination of Istanbul, Turkey.

#### **D. Bell Provides Financial Support to HTS**

34. Based on my involvement in this investigation, including my communications with other FBI personnel, review of search warrant returns, review of chats on Application-1 and Application-2 between Bell and User 1, and review of records received from Western Union (“WU”), I am aware that Bell knowingly wired money to individuals located in Turkey and Syria who I believe to be supporters of HTS, often at the direction of User 1. More specifically, a review of WU Account records used by Bell revealed that Bell sent at least 18 payments totaling approximately \$3,150 to several WU accounts used by User 1 or his associates. Three examples of chats between Bell and User 1 concerning his need for money follow.

35. First, on or about February 19, 2017, Bell and User 1 communicated on Application-2 regarding User 1’s need for money, as well as Bell’s use of an intermediary, Hassan, to transfer money from Bell to User 1.

|         |                                                           |
|---------|-----------------------------------------------------------|
| User 1: | But I do I need money👊                                    |
| Bell:   | I know. Did you tell Hassan I will send you money?        |
| Bell:   | I will send it to him and he will send it to you.         |
| User 1: | Yes                                                       |
| Bell:   | Okay, good. Then I will contact him.                      |
| User 1: | but how                                                   |
| User 1: | do not tell anyone                                        |
| Bell:   | Let me ask. How did he send you the money I left for you? |
| User 1: | I do not understand what you mean                         |
| User 1: | [unknown message]                                         |

Bell: Hassan sent you money that I have to him in Istanbul. How did he get it to you?

User 1: I got the money

Bell: Yes, I know. how did he get it to you?

User 1: Gets what

User 1: You mean to send money to the Syrian territory

Bell: I cannot send money to Syria.

User 1: Send money from Istanbul to Aleppo is very easy.

Bell: I must send to Turkey. Then Hassan send to you.

36. Second, as discussed earlier, on or about March 19, 2017, in a communication between Bell and User 1 on Application-2 Bell provided advice to User 1 regarding the purchase of a firearms and ammunition for User 1. More specifically, in this conversation Bell and User 1 discussed the cost and type of weapon and ammunition that would be good for User 1, sent photos to each other of six different weapons, and discussed their price. This conversation indicates that Bell was intending to provide finances for a weapon for User 1, but was concerned about the cost of the weapon User 1 will buy, with Bell stating that one of the guns “is very expensive and remember my limits on money. Half must be saved for new house.”

37. On or about November 20, 2018, Bell communicated with User 1 on Application-1. In this communication, User 1 requests Bell to send him \$500.00. This evidences that that Bell and User 1 had agreed that User 1’s brother would be an intermediary for payments.

User 1: My dear, you have to send the money today to my sister-in-law\*

Bell: I do not feel comfortable sending. We agreed to your brother only. This photo does not look like her.

Bell: I am happy to send you money but I do not like feeling anxious all the time.

Bell: I love you so I am unhappy about this all.

User 1: I do not understand\*

User 1: My dear, I told you before that the refugee is allowed to receive only two or three money orders. We send it to my sisterr-in-law this time and in the coming days , we send it to my brother\*

User 1: My dear, I will leave it up to you to choose, you can send it to my brother if you want or you can send it to my sister-in-law\*

User 1: Send me the money today, \$500\*

38. For the period between approximately February 2018 through November 2018, a WU Account ("Bell WU Account") was used to send at least 18 payments totaling approximately \$3,150 to a specific WU account used by and individual believed to be the brother of User 1, based in part of the name of the WU recipient matching the name of the brother of User 1, Application-1 chats between Bell and User 1 that describe User 1's brother by name as the recipient of WU funds, and a chat from User 1 to Bell on Application-1 that attached a file containing a photo ID of User 1's brother. More specifically, subpoena returns identified the user of the sending account for these 18 payments as: Maria Bell, phone number 973-[REDACTED], address [REDACTED], Hopatcong, New Jersey 07843. The phone number and address in subpoena returns matches law enforcement records on Bell's phone number and address. Furthermore, the email address associated with the payer account also resolved to Maria Bell. A chart of these transfers follows.

| Payer Name | Payer Phone | Payer Email                     | Payer Address | City      | State | Zip   | Country | Payee Name  | Pmt Send Date | Currency | \$ Amount   |
|------------|-------------|---------------------------------|---------------|-----------|-------|-------|---------|-------------|---------------|----------|-------------|
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 11/21/2018    | USD      | \$ 200.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 11/7/2018     | USD      | \$ 200.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 11/1/2018     | USD      | \$ 200.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 10/22/2018    | USD      | \$ 125.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 10/5/2018     | USD      | \$ 125.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 8/5/2018      | USD      | \$ 200.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 7/22/2018     | USD      | \$ 125.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 7/13/2018     | USD      | \$ 300.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 6/29/2018     | USD      | \$ 125.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 6/23/2018     | USD      | \$ 125.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 6/13/2018     | USD      | \$ 175.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 5/18/2018     | USD      | \$ 150.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 4/22/2018     | USD      | \$ 100.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 4/13/2018     | USD      | \$ 100.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 4/6/2018      | USD      | \$ 150.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 3/1/2018      | USD      | \$ 300.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 2/21/2018     | USD      | \$ 300.00   |
| MARIA BELL | -9286       | Google Subscriber: "Maria Bell" | REDACTED1     | HOPATCONG | NJ    | 07843 | US      | Associate 1 | 2/8/2018      | USD      | \$ 150.00   |
|            |             |                                 |               |           |       |       |         |             |               | Total    | \$ 3,150.00 |

39. Additionally, the Bell WU account was used to send numerous other payments to accounts controlled by associates of User 1, with funds being received in Turkey or Syria. Notably, there were two primary payee phone numbers – that is, phone numbers provided by WU recipients – that received

approximately 30 payments between on or about November 11, 2017 and on or about November 22, 2018. The payee phone number corresponding to the above 18 payments matched the payee phone number used in at least 5 other payments sent through the Bell WU Account, where a different name was provided by a recipient. Based on my training, experience, and involvement in this investigation, I believe that Bell was sending payments to User 1 through associates to conceal the intended recipient from U.S. law enforcement.

40. This investigation shows that the recipient of these transfer was the brother of User 1. That evidence includes chats which indicate that Bell and User 1 had agreed that she send the money to his brother, and WU records that identify User 1's brother as the recipient of those transfers.

41. Further, Bell expressed concern that her transfers could be tracked by U.S. law enforcement. On or about September 15, 2018, Bell used Application-1 to communicate with User 1 regarding her money transfers:

|            |                              |                                                                                                                                                            |
|------------|------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Redacted   | 9/15/2018 3:37:30 AM(UTC-4)  | Please send money to me today                                                                                                                              |
|            | 9/15/2018 3:40:13 AM(UTC-4)  | Dear okay.....?                                                                                                                                            |
|            | 9/15/2018 3:49:30 AM(UTC-4)  | I am fine                                                                                                                                                  |
|            | 9/15/2018 7:07:20 AM(UTC-4)  |                                                                                                                                                            |
| Maria Bell | 9/15/2018 8:10:31 AM(UTC-4)  | Dear, I will look at my finances and see what can be sent. Today I have maintenance performed on the car and will begin to pay a man to work on the house. |
| Maria Bell | 9/15/2018 8:11:30 AM(UTC-4)  | But I will not have my account be watched more closely than It is already.                                                                                 |
| Maria Bell | 9/15/2018 8:12:29 AM(UTC-4)  | Each time I withdraw money, it is noted because Western Union is trying to track fraud and terrorists for the government.                                  |
| Maria Bell | 9/15/2018 8:22:08 AM(UTC-4)  | I love you but this is upsetting.                                                                                                                          |
| Maria Bell | 9/15/2018 8:48:52 AM(UTC-4)  | I will explain to you later today dear.                                                                                                                    |
| Maria Bell | 9/15/2018 9:17:44 AM(UTC-4)  | I am not upset at you dear. I am upset at many things today. I try to be peaceful but it is difficult right now.                                           |
| Redacted   | 9/15/2018 10:01:21 AM(UTC-4) | My dear, send me the money today. Send 350. Do not send less than that.                                                                                    |
|            | 9/15/2018 11:45:29 AM(UTC-4) | Hella dear                                                                                                                                                 |
|            | 9/15/2018 11:45:30 AM(UTC-4) | Yes, please do not worry.                                                                                                                                  |
|            | 9/15/2018 11:45:31 AM(UTC-4) | Yes. Can you send the money from Western Union using the name Kyle, to my friend? What do you think? This will be good.                                    |
|            | 9/15/2018 12:09:04 PM(UTC-4) | Okay dear ☺                                                                                                                                                |
| Maria Bell | 9/15/2018 12:14:03 PM(UTC-4) |                                                                                                                                                            |
| Maria Bell | 9/15/2018 12:14:16 PM(UTC-4) |                                                                                                                                                            |
| Maria Bell | 9/15/2018 12:15:41 PM(UTC-4) |                                                                                                                                                            |
| Maria Bell | 9/15/2018 12:17:01 PM(UTC-4) | Dear, the money will only come from me. I know Kyle will not participate.                                                                                  |

42. Based on my training and experience, and my involvement in this investigation, I believe that what Bell communicated above is that she intended to send User 1 additional funds via the Bell WU Account, and that in doing so she would not draw any more scrutiny to the Bell WU Account than it was already receiving from Western Union, as Bell believed that Western Union was already working with the government to track individuals who provide funding to foreign terrorist organizations.

43. Based on my training and experience, I also know that terrorist organizations use various methods, including sending money via intermediaries in order to avoid detection and mask the fact that the funds are being sent to assist Foreign Terrorist Organizations. As such, I believe Bell is referencing the risk in providing money to the aforementioned Users.

44. Based on the above, I believe that there is probable cause that Bell concealed the provision of material support and resource to the al-Nusra Front ("ANF") and Jabhat al-Nusra, also known by other aliases including Hay'at Tahrir al-Sham ("HTS"). Specifically, there is probable cause that Bell knowingly provided the financial support, including but not limited to the above-described money transfers to User 1 through User 1 associates, in efforts to conceal the source and nature of the funds. Finally, based on my training and experience, and involvement in this investigation, I believe that Bell sent money to User 1 knowing that at least some of these funds would be used to purchase firearms for HTS.