

**BEFORE THE CITIZENS' GRAND JURY ON BEHALF OF
THE PEOPLE OF THE UNITED STATES**

At Charleston, South Carolina

JP

**THE PEOPLE OF THE UNITED STATES
OF AMERICA**

Complainant,

v.

HASAN DOĞAN PIKER,

Resident of Los Angeles, California;

and

ZOHRAN KWAME MAMDANI,

Mayor of New York City, New York

Resident of New York, New York;

and

ILHAN ABDULLAHI OMAR,

Elected Congresswoman from Minnesota's

Fifth Congressional District

Resident of Minneapolis, Minnesota;

and

RASHIDA HARBI TLAIB,

Elected Congresswoman from Michigan's

Twelfth Congressional District

Resident of Detroit, Michigan;

and

ABDULRAHMAN ("ABDUL") EL-SAYED,

Democratic Party nominee for U.S. Senate,

Resident of Detroit, Michigan;

and

BARACK HUSSEIN OBAMA,

Former President of the United States

Resident of Washington, D.C.

Accused Co-Conspirators

CRIMINAL INDICTMENT

ALLEGATIONS OF FACT

CITIZENS' GRAND JURY

At Charleston, South Carolina

Case No. 2026-0001

Count I Incite and Cause Violence and
Solicitation of a Crime of Violence

Count II Reckless Endangerment

Count III Seditious Conspiracy and Advocacy
of Force Against the Authority of the United
States

Count IV Insurrection Against the United
States and the U.S. Constitution

Count V Logan Act Unauthorized Private
Foreign Policy

Count VI Treason in Time of War

Count VII Involuntary Manslaughter
(Resulting from Conspiracy)

TRUE BILL OF INDICTMENT BY THE CITIZENS GRAND JURY

This Citizens' Grand Jury True Bill of Indictment presents the following to the People comprising a jury of citizens. It further demands that those among the Accused who are unlawfully in this country, or who hold office by virtue of an unresolved and challenged naturalization, be criminally charged and prosecuted and removed according to law.

God Save Our Sacred Republic.

THE CITIZENS' GRAND JURY CHARGES THAT:

The Citizens' Grand Jury charges a single enterprise, and charges each Accused with these offenses: inciting and causing violence and solicitation of a crime of violence; reckless endangerment; seditious conspiracy and advocacy of force against the authority of the United States; insurrection against the United States and the U.S. Constitution; unauthorized private foreign policy in violation of the Logan Act; treason in time of war; and involuntary manslaughter resulting from conspiracy. HASAN DOĞAN PIKER mass-communicates a Marxist-Islamist manifesto to many millions and recruits the young and others including designated terrorist groups as set forth herein to carry it out. ZOHRAN KWAME MAMDANI,



ILHAN ABDULLAHI OMAR, RASHIDA HARBI TLAIB, and ABDULRAHMAN EL-SAYED carry that manifesto into City Hall, the Congress, and a campaign for the United States Senate. BARACK HUSSEIN OBAMA, a closeted Muslim and former President of the United States, has credentialed the Mayor of New York, Zohran Mamdani, and joined the other Accused in the open. Their words and deeds, acting in concert, incite and cause and have caused violence against Jews and Christians on American soil, including but not limited to the July 23, 2026 stabbings outside a New York synagogue and the murders of Yaron Lischinsky and Sarah Milgrim outside the Capital Jewish Museum, as well as other acts of violence.

I. INTRODUCTION

1. Although the United States of America, the U.S. Federal Government, and the U.S. Constitution establish a Constitution-driven Judeo-Christian Republic leaning heavily towards freedom and governance by the citizens of this country, the Constitution and Federal laws strike a sometimes difficult and delicate balance between maximum freedom where achievable and existential threats to the survival of the country and the safety of its people.
2. This is particularly true where imminent and actual violence against U.S. citizens on the basis of race or religion or patriotic defense of the nation is in fact occurring and likely to grow. Jews and Christians in the United States are now living in constant, immediate fear of severe bodily injury or death.
3. For example, when an aggressive and war-bent worldwide campaign of international communism was openly aimed at toppling every government of the world and forcibly replacing



them with communist tyranny, the U.S. Congress responded.

4. 50 U.S.C. § 841 through § 844 begins with declaring:

Congress finds and declares that the Communist Party of the United States, although purportedly a political party, is in fact an instrumentality of a conspiracy to overthrow the Government of the United States. It constitutes an authoritarian dictatorship within a republic, demanding for itself the rights and privileges accorded to political parties, but denying to all others the liberties guaranteed by the Constitution. The peril inherent in its operation arises not from its numbers, but from its failure to acknowledge any limitation as to the nature of its activities, and its dedication to the proposition that the present constitutional Government of the United States ultimately must be brought to ruin by any available means, including resort to force and violence.

5. Today, we may well—and indeed we must—substitute the phrase “Communist Party” with the existential threat of our age: **‘Marxist-Islamist Jihad’**.

6. 50 U.S.C. § 842 requires that:

The Communist Party of the United States, or any successors of such party regardless of the assumed name, whose object or purpose is to overthrow the Government of the United States, or the government of any State, Territory, District, or possession thereof, or the government of any political subdivision therein by force and violence, are not entitled to any of the rights, privileges, and immunities attendant upon legal bodies created under the jurisdiction of the laws of the United States or any political subdivision thereof; and whatever rights, privileges, and immunities which have heretofore been granted to said party or any subsidiary organization by reason of the laws of the United States or any political subdivision thereof, are terminated.



7. Today, there is an aggressive conspiracy whose object and purpose is to permanently overthrow, destroy, and supplant the Government of the United States, or the government of States, Territories, Districts, or possessions, by criminally illegal means of various types including but not limited to force and violence. The Accused work in concert with one another and with networks historically and presently connected to Hamas, the Muslim Brotherhood, and the Council on American-Islamic Relations ("CAIR"), to name only a few.
8. Hamas is a federally designated foreign terrorist organization. The Muslim Brotherhood and CAIR have been designated terrorist organizations by the States of Texas and Florida.
9. The leaders and members of this aggressive Marxist-Islamist conspiracy have thrown off all pretense or subterfuge and openly celebrate amongst themselves, their followers, and the public their determination to transform the United States of America into a dictatorial, authoritarian caliphate governed by Sharia law rather than the political rights and laws upon which this country is built. That Marxist-Islamist Jihad is spreading like a cancer throughout the United States and the West.
10. The Citizens' Grand Jury affirms and embraces the right of U.S. citizens to become persuaded and seek to persuade others of any religious, political, philosophical or other belief, in a peaceful manner respectful of other citizens' equivalent rights to take appropriate action.
11. Indeed, this Republic is founded on the principle and political rule that "The answer to bad speech is more speech," and not censorship, as U.S. Supreme Court Justice Louis Brandeis reminded the nation in *Whitney v. California*, 274 U.S. 357 (1927).
12. However, threats, intimidation, violence, corruption, and even fraud are not excused whether the subject matter is a mugging of "Your money or your life" or forcing people to adopt beliefs



they find repugnant. Or as Thomas Jefferson wrote, "To compel a man to furnish contributions of money for the propagation of opinions which he disbelieves and abhors, is sinful and tyrannical."

13. The object and purpose of the current Marxist-Islamist conspiracy is to permanently and forever deprive U.S. citizens of the freedoms, rights, and legal protections upon which this country is founded and to enslave U.S. citizens or execute those who will not comply.

14. Another object and purpose of this conspiracy is to neuter and degrade the United States of America on the world stage so that the conspirators can exert authoritarian control in the name of their false god, or execute those who will not engage in Marxism and "Islam," which means "submission."

15. Islam, as practiced and preached by the individuals and networks at issue here, is not a bona fide religion but rather a cult of conquest and death. The Qur'an outlines the goal of spreading Islam and of forcing nonbelievers under Islamic rule, including by requiring them to pay the jizya or to convert. See Qur'an 9:29. That doctrine of conquest is not a private devotion. In the hands of the Accused it is a political program: inhabit and take over this country, replace its Judeo-Christian values and religions, and substitute Marxist-Islamist dogma.

16. The efforts to protect the survival of this Republic against remarkably similar international communism, when it was at its peak and a serious threat, have been sustained by the U.S. Supreme Court.

17. The Citizens' Grand Jury bases this effort on the principle that those who would destroy the legal rights of our nation's citizens are not entitled to any of the rights, privileges, and immunities they are striving to terminate.



18. In contrast with the threats of international communism, Marxist-Islamist Jihad is actually causing murder and violence against U.S. citizens, residents, and visa visitors based on their ethnic identity as Jews and Christians, their religious beliefs as being different from Islam, and/or their efforts to preserve the United States of America consistent with its founding. On June 1, 2025, Mohamed Sabry Soliman firebombed a Run for Their Lives gathering in Boulder, Colorado, shouting "Free Palestine"; Karen Diamond, eighty-two, died of her burns on June 25, 2025. On August 27, 2025, during all-school Mass at Annunciation Catholic Church in Minneapolis, a gunman fired through the church windows into pews filled with children. Fletcher Merkel, eight, and Harper Moyski, ten, were killed. The Federal Bureau of Investigation investigated the attack as a hate crime targeting Catholics. On March 12, 2026, Ayman Mohamad Ghazali rammed Temple Israel in West Bloomfield, Michigan, home to a preschool, and opened fire. Iran has threatened the President and his family, including Ivanka Trump, Barron Trump, and Jared Kushner, as further set forth in paragraph 29 and in Count Six. These are just a few examples.

19. Riots, murder, violence, and concealed executions of citizens who are Jews and Christians are occurring, and the conspiracy openly intends to greatly accelerate and expand these dangers. The words and acts of the Accused do not merely comment on foreign policy. They incite and cause violence.

20. The Fifth Amendment to the U.S. Constitution provides that no person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury.

21. The grand jury is a bulwark against the king and, in this Republic, is not the creature of the



executive. In *United States v. Williams*, 504 U.S. 36 (1992), Justice Scalia held that it belongs to the People and may investigate and indict merely on suspicion that the law is being violated.

22. In these matters, the Department of Justice has refused to act.

23. This Citizens' Grand Jury therefore acts.

24. This is a Judeo-Christian Republic, founded under just man-made law and the law of our Creator.

25. The God-given rights secured at the Founding include the right of a people to live without being hunted for their faith or their covenant with the Jewish people and Jesus and the Father.

26. When public officials and their backers import a foreign-aligned hatred onto American soil and into American government, they do not merely offend taste. They put the Republic itself in peril.

27. The Accused are charged with inciting and causing violence, reckless endangerment, and sedition, committed knowingly and willfully, and covered within the broad reach of criminal law.

28. The statements, dates, and publications underlying this indictment are compiled in the accompanying record, marked Exhibit A, and are incorporated herein.

II. GENERAL FACTUAL ALLEGATIONS OF CONSPIRATORS

A. INCITE AND CAUSE VIOLENCE

29. The Conspirators herein charged, each and every one of them, have used their inflammatory statements—which are intended to be, and calculated to be and are, incitement to imminent and



actual violence—and their actions not only to inflame gullible crowds poorly educated in history and foreign policy but also as fuel to motivate insurrection against the governmental institutions and government of the Constitutional Republic of the United States of America. Their words cause violence. That is the point. These words are not protected by the First Amendment. It is illegal and a crime to yell fire in a crowded theater. This is much worse! That violence is not only in the streets against Jews and Christians. It is aimed at the President of the United States and his family. Iranian state media and IRGC-affiliated outlets have threatened the President, Ivanka Trump, Barron Trump, and Jared Kushner. In July 2026, Tehran displayed “Blood for Blood” murals of the President and his family above coffins. In August 2026, Iranian state television aired “Where to kill Barron Trump?” The United States Secret Service confirmed it was aware of the video. Ivanka Trump, who converted to Judaism, and Jared Kushner have been the subject of a reported IRGC-linked plot against the Florida household they share. The Accused incite and cause violence in the same climate in which Iran issues those threats. The signal and direction of that network are charged in Count Six.

30. Marxist-Islamist warriors—more and more openly and without disguise—seek to expand their continued 1,400-year campaign of violent military conquest, and the extermination of the Jewish and Christian people in particular, into the interior of the United States of America. They also seek to co-opt the machinery of U.S. Government and social institutions to project their murderous campaign against anyone who does not bow the knee (Islam being the word for “Submission”) to their false religion throughout the world.

B. HASAN DOĞAN PIKER



31. HASAN DOĞAN PIKER is a political internet streamer with an audience measured in the many millions. He is the chief propagandist of this movement. Through hours of daily streams he mass-communicates a Marxist-Islamist manifesto and recruits the young to carry it out.

32. The remaining Accused carry out that manifesto. Its goal is the destruction of the American way of life, the replacement of this country's Judeo-Christian values and religions, and the inhabiting and taking over of the United States with Marxist-Islamist dogma.

33. Piker was not a random celebrity who clicked "endorse." He was a key surrogate who campaigned shoulder to shoulder with Abdul El-Sayed over the Senate race in Michigan. Piker supplied access to millions of young followers, and the activist energy El-Sayed needed to defeat Rep. Haley Stevens (D-MI) in the Michigan Democratic primary for Senate. See "Every Democrat should have to answer for Hasan Piker," *The Washington Examiner*.

34. The Anti-Defamation League has documented rhetoric that sanitizes violence and denigrates Jewish people. Twitch suspended him for "Zionist pig."

35. He has called ultra-Orthodox Jews "inbred," called an anti-Hamas viewer a "bloodthirsty, violent pig-dog," and compared liberal Zionists to "liberal Nazis."

36. He said "Hamas is a thousand times better" than the Israeli state. In 2026 he stood by that comparison and said he would "vote for Hamas over Israel every single time."

37. He said "America deserved 9/11," later falsely calling it satire.

38. He claimed Israel "polluted the evidence pool" on October 7, 2023, sexual violence, even though nearly all of the evidence was filmed on smartphone cameras by Hamas invaders



themselves and proudly posted on the internet by Hamas itself, including those fighters.

39. He has said Zionism is a “racist ideology.”

40. Rep. Ritchie Torres wrote to platforms about him.

41. ADL CEO Jonathan Greenblatt said Piker has “a long track record of commending and excusing terrorism.”

42. Piker interviewed Mamdani during the mayoral race, attended his election-night party, and campaigned with El-Sayed. El-Sayed declined to disavow him.

43. On or about August 20–21, 2026, during a multi-hour Twitch stream, Piker stated:

If Jews in America keep putting this idea out there that they are singularly invested in Israel, eventually someone’s going to come around and take action, not against the State of Israel, mind you, but against American Jews.

I don’t know how people don’t recognize how dangerous this predicament is, how dangerous this is for Jews.

You’re running around basically tying your entire identity to a country that inevitably will be seen as Jewish ISIS and you’re saying, as Jews, this is all we care about. You’re making anti-Semitism worse.

44. This is more than a forecast. It incites and causes violence. Piker identified the target class—“American Jews”—and told a mass audience that “action” against that class would follow. The Grand Jury charges that the “action” he described is violence against Jews, particularly high-profile Jews and visible Jewish Zionist advocates, including killing them in the streets and elsewhere. It is the equivalent of a Fatwa for the extermination of Jews.



45. Piker did not merely criticize a foreign government. He accused American Jews who support Israel of dual loyalty—of “tying [their] entire identity” to a foreign state—called Israel “Jewish ISIS,” and declared that those Jews are “making anti-Semitism worse.” Dual loyalty and blood libel are the old anti-Semitic charges: that Jews are secretly loyal to a foreign people, and that they are collectively guilty of hidden crimes and therefore deserve punishment. Piker used both. He identified the offending class, told a mass audience that “action” against American Jews would follow, and shifted blame onto the targets themselves. In practical effect, this was a fatwa—a false religion-based declaration of open war. Visible Jewish Zionist advocates stand at the top of that list.

46. The statement was delivered after synagogue attacks, after Greenblatt’s public condemnation of Piker, and after notice that the vocabulary Piker uses had already been identified as a call to violence.

47. Piker has also mass-communicated genocidal language about the destruction of a people. In a circulated Twitch clip he stated: “We’re gonna keep bringing in immigrants to this country — on purpose — so they can fuck your sister and then maybe even your daughter. We’re going to destroy the white race, Bitch. That’s what we’re here to do.” That is genocidal language. It is of a piece with the manifesto he broadcasts against Jews and Christians, against this country, and against the American way of life.

C. ZOHRAN KWAME MAMDANI



48. ZOHRAN KWAME MAMDANI is Mayor of the City of New York, home to the largest Jewish population in the United States.
49. Mamdani has aggressively moved to replace New York City's capitalist society with communism and implement "Defund the Police" policies.
50. In December 2024, as a candidate, he said that as mayor "New York City would arrest Benjamin Netanyahu," who is the Prime Minister of Israel.
51. In October 2025 he said the City should uphold an International Criminal Court ("ICC") warrant the United States never recognized.
52. After the election he called New York a "city of international law" that would enforce those warrants.
53. This is clearly a matter of U.S. foreign policy and law and not within the jurisdiction of New York City or its Mayor, and indeed concerns foreign relations entirely among foreign countries and international organizations outside of the United States.
54. In July 2026 Mamdani told the New York Times he was in "active conversation" with the City law department about arresting Netanyahu before the U.N. General Assembly, and that Netanyahu "belongs in The Hague" (which in context means in prison).
55. On July 21, 2026, Mamdani called Netanyahu a "war criminal" and the "architect of a horrific genocide," said he is "not welcome in New York City, nor is any other war criminal at large," and demanded that the federal government make the arrest. Those words incite and cause violence. They mark Jews and supporters of Israel as criminals at large in the city with the largest Jewish population in the United States.



56. Israel's U.N. Ambassador called those remarks blood libel, that is, a classic historic slander of Jews.

57. The U.S. Constitution and the Federal Government, not The Hague, are sovereign within New York. The United States never ratified the Rome Statute and does not recognize the ICC warrant against Israel's prime minister.

58. A Mayor who puts the City law department to work for a foreign tribunal substitutes foreign judicial power for American authority and is pursuing foreign policy independent of the authority of the U.S. Government.

59. On the October 7, 2025 anniversary of the invasion and terrorist attacks on Israel on October 7, 2023, Mamdani said Netanyahu and the Israeli government "launched a genocidal war."

60. Again, none of this is relevant to the authority or duties of the Mayor of New York.

61. Mamdani and the other conspirators are seeking to hijack the governmental institutions of this Republic not only to enslave non-Muslim Americans but also to carry out their anti-Semitic and anti-Christian hatred outside of this nation's borders. They are co-opting and misusing U.S. institutional resources and government institutions.

62. Mamdani repeatedly refused to condemn "globalize the intifada." That slogan is not a policy debate. An intifada is a campaign of violence. To "globalize" it is to export that violence onto American streets, including against American Jews. The refusal to condemn it is a refusal to withdraw a call that incites and causes violence.

63. Anti-Defamation League CEO Jonathan Greenblatt publicly asserts that the phrase "is an explicit call for violence," as reported by NBC News, explaining that the slogan "celebrates and



glorifies savagery and terror” and serves as “an explicit incitement to violence.”

64. Asked whether Israel has a right to exist as a Jewish state, Mamdani would say only that it may exist “as a state with equal rights.”

65. This of course places Israel’s right to exist within his own subjective opinion.

66. He has publicly proclaimed that the Boycott, Divestment and Sanctions movement is “consistent with the core of my politics.”

67. BDS is explicitly illegal under U.S. law as a conspiracy and as an imposition of anti-Israel foreign policy outside of the United States—a private unauthorized foreign policy—and is forbidden by explicit laws and Executive Orders.

68. Mamdani co-founded a Students for Justice in Palestine chapter.

69. On January 2, 2026, his first day in office, he revoked prior executive orders adopting the IHRA definition of anti-Semitism and restricting City BDS procurement.

70. Israel’s Foreign Ministry called the action “anti-Semitic gasoline on an open fire.”

71. In July 2026 his Advisory Committee on the Judiciary included no Jewish members. Four Jewish bar associations, backed by the ADL, warned that the omission was dangerous.

72. After his election to office, UJA-Federation of New York, JCRC-NY, ADL New York/New Jersey, AJC New York, and the New York Board of Rabbis stated that his core beliefs were “fundamentally at odds” with the Jewish community’s values.

73. Public reporting has identified six-figure contributions from CAIR-linked political committees, including the Unity & Justice Fund, to a super PAC supporting Mamdani. This indictment does not charge a personal check from Mamdani to Hamas. It charges that he operates



within a network that leads back to CAIR, and that CAIR's documented proximity to Hamas is set out below. Those CAIR-linked dollars are not incidental. They place this Mayor in the same network whose Texas chapter produced a Holy Land convict, and whose leadership sat in proximity to Hamas as set forth in paragraph 115.

74. Rama Duwaji is his spouse and part of the public face of his campaign. After October 7, 2023, she liked social media posts treating reports of Hamas sexual violence as a "mass rape hoax."

75. Her older social media posts stated that Tel Aviv "shouldn't exist" and praised PFLP figures. She later deleted an account after those posts resurfaced. The Popular Front for the Liberation of Palestine is a Palestinian Marxist–Leninist organization founded in 1967 by George Habash. Mrs. Mamdani did not publicly break with that record.

76. Comment on Mamdani's posture toward violent criminals was of a piece with that record. New York City Councilwoman Vicky Paladino asked whether he was "deeply saddened" by a murder after he expressed concern for a jailed killer. Spencer Pratt wrote: "We cannot have leaders who weep for murderers." A widely circulated account of the Islamic takeover of Manhattan is "The Islamic Takeover of Manhattan – Chilling Video by Nate Friedman."

D. ILHAN ABDULLAHI OMAR

77. ILHAN ABDULLAHI OMAR is a Member of Congress from Minnesota. Her words from that office incite and cause violence.



78. In 2012 she wrote that “Israel has hypnotized the world.” In 2018 she referred to “the apartheid Israeli regime.” Those are classic anti-Semitic tropes. They do not describe a foreign policy disagreement. They mark Jews as occult manipulators and mark the Jewish state as a criminal enterprise, and they cause violence against the people so marked.

79. In February 2019 she wrote “It’s all about the Benjamins baby,” then named AIPAC, and spoke of “allegiance to a foreign country.” H.Res.241 condemned those remarks. Dual loyalty is a call that historically precedes pogroms. It incites and causes violence.

80. On February 2, 2023, she was removed from the House Foreign Affairs Committee. H.Res.1207 recited the same statements.

81. In June 2021 she faced a censure effort after remarks colleagues read as comparing the United States and Israel to Hamas and the Taliban.

82. She endorsed Abdul El-Sayed, campaigned with him in Dearborn, Michigan and appeared with him and Tlaib on July 31, 2026.

83. Her fitness to hold that office is already before a federal court. Freedom Watch has petitioned for a writ of mandamus to compel the Department of Homeland Security and USCIS to adjudicate the record of her marriages and naturalization, *Klayman v. Noem*, No. 1:26-cv-00656-TNM (D.D.C.). That petition followed the killing of a congressional subpoena for the same file. This indictment does not retry that case. It charges what she has done with the office she holds.

E. RASHIDA HARBI TLAIB



84. RASHIDA HARBI TLAIB is a Member of Congress from Michigan. Her words incite and cause violence.

85. In 2019 she said she gets “a kind of a calming feeling” thinking about the Holocaust, because Palestinians lost land so Jews could have a haven.

86. After October 7, 2023, she posted “from the river to the sea, Palestine will be free.” That slogan is not a peace proposal. The river is the Jordan. The sea is the Mediterranean. The land between them is the State of Israel. The demand that “Palestine will be free” in that entire space is a call for the expulsion—and, in Hamas’s own charter and practice, the killing and extermination —of Jews from Israel. It is a call to violent action. The House of Representatives found that she doubled down on a call to violence. That finding was correct. The slogan incites and causes violence against Jews here and abroad.

87. The scale of that call matters. The Jewish population of the world is approximately 15 million. Approximately 500 million Arabs surround Israel. There are about 2 billion Muslims in the world. Combined with overt attempts to murder all the Jews, “from the river to the sea” is not a metaphor for coexistence. It is a demand that a small people be cleared from their country.

88. On November 7, 2023, the House censured her 234–188, including 22 Democrats.

H.Res.845 found she “doubled down on this call to violence.”

89. The ADL has described the slogan as anti-Semitic and a Hamas rallying cry. Michigan Attorney General Dana Nessel called the post a “cruel and hateful remark.”

90. In November 2025 she introduced a resolution to declare Israel’s Gaza campaign a genocide. She has called Netanyahu a “genocidal maniac.” Those words invert the Holocaust, mark Jews as



the new Nazis, and incite and cause violence against the people so marked.

91. In July 2026 she said Palestinians “continue to be massacred by this apartheid regime with the full backing of our government” and demanded a full arms embargo. She sent a fundraising text for New Yorkers for Lower Costs, a super PAC supporting Mamdani. That is not commentary. It is material support for the same campaign.

F. ABDULRAHMAN EL-SAYED

92. ABDULRAHMAN (“ABDUL”) EL-SAYED is the 2026 Democratic nominee for U.S. Senate in Michigan. His words incite and cause violence. He has taken the manifesto Piker broadcasts and carried it into a Senate campaign.

93. He has accused Israel of “apartheid” and “genocide,” called the Israeli government “as evil as Hamas,” and demanded an end to all U.S. aid to Israel.

94. He told CNN Israel is “certainly a rogue state.”

95. On MSNBC’s Morning Joe he called Israel “bloodthirsty.”

96. Asked whether Israel has a right to exist as a Jewish state, he said that question was “secondary to whether it has a right to our tax dollars.”

97. After an attempted bombing and shooting at a Jewish preschool at a Michigan synagogue, he said “Hurt people hurt people.” That is not consolation. It is an excuse. It treats an attack on Jewish children as the predictable product of Jewish conduct. It incites and causes further violence by telling the next attacker that the victims had it coming.



98. In October 2022, El-Sayed was the keynote speaker at the annual banquet of CAIR's Oklahoma chapter. He addressed Oklahoma's 2010 referendum to bar state courts from considering Sharia law—a measure that passed with approximately 70 percent of the vote. He said:

The same exact forces that drove Native peoples from their land two centuries ago, destroyed Black Wall Street a century ago, bombed a building decades ago and tried to ban Sharia law not a decade ago, those forces are alive and well today.

The reason I wanted to go all the way back to the 1830s is because you can't understand a Sharia ban without understanding the Trail of Tears. You can't understand the efforts to uproot Muslim Americans without understanding the Tulsa massacre. You cannot understand the challenges we face today without understanding White supremacy.

99. He thereby treated American opposition to Sharia law as an expression of white supremacy, and placed a popular vote to keep Islamic law out of American courts in a line with the Trail of Tears, the Tulsa massacre, and the Oklahoma City bombing. That is not a defense of religious liberty. It is an attack on the right of this country to refuse a foreign legal system.

100. El-Sayed has also described personal submission to Sharia as an obligation lasting until death. As a medical student he said he did not want to stand before God and say he “did it the easy way instead of the Sharia-compliant way,” adding, “Not because of fear but because of obligation.”

101. Omar, Tlaib, and the other members of the Squad endorsed him. He rallied with them on July 31, 2026. On or about September 2, 2026, Tucker Carlson, a mass communicator who has



received millions from Qatar and has been publicly condemned as anti-Semitic by Jewish organizations, said he “wouldn’t vote for Mike Rogers at gunpoint,” called El-Sayed’s Republican opponent “a tool of Israel and the intelligence agencies,” and described El-Sayed’s campaign as “literally Trumpian.” That praise is not a surprise. It is a confirmation of El-Sayed’s alignment with anti-Semitic political forces in our country.

102. His father-in-law, a top donor to a super PAC supporting him, has been reported in the leadership of U.S. organizations tied to the Muslim Brotherhood, including channels associated with CAIR-Michigan and ISNA. This indictment does not name the father-in-law as a defendant. It charges the web. El-Sayed campaigns with Piker, Omar, and Tlaib, on money and organization that traces to Brotherhood-linked institutions, which themselves sit in proximity to the Hamas support network described below. A CAIR banquet speech, Brotherhood-linked family money, and a Senate campaign built on that circuit are not coincidence. They are membership in the milieu whose path to Hamas is set forth in paragraph 115.

G. BARACK HUSSEIN OBAMA

103. BARACK HUSSEIN OBAMA is a closeted Muslim and a former President of the United States. There is reason for him to hide it. He held the presidency at a time when an open confession of Islam would have been completely unacceptable to the country he governed. He hid it then. He is using what remains of that office now. His father, Barack Hussein Obama Sr., was born into a Muslim family in Kenya. As a child in Indonesia he went to madrasa schools, lived in a Muslim household under a Muslim stepfather, was registered at school as a Muslim,



and later described hearing the call to prayer at dawn and dusk. That is formation, not biography. It is the ground on which he later governed.

104. Since before his election as President in 2008, when he announced “We are five days away from fundamentally transforming America,” Barack Hussein Obama has worked to engineer a communist and Islamic revolution in the United States—two anti-Western philosophies joined as one, which is the same combination this Indictment charges as a single enterprise. That was not a slogan. It was a program. He has not abandoned it. The object of that program, so far as this Grand Jury is concerned, was to work against Israel’s interests and to further Islamic ones, and to make this Republic safe for open Muslims in high office.

105. As President he discontinued the public White House ceremony for the National Day of Prayer that his predecessor had held—a ceremony of this Judeo-Christian Republic—while hosting annual Ramadan Iftar dinners in the White House. In his June 4, 2009 address in Cairo he invoked “the Holy Koran” repeatedly—“As the Holy Koran tells us,” “the Holy Koran teaches,” “the Holy Koran tells us”—and greeted his audience in Islamic form. He presented the Qur’an as holy from the office of President of a Judeo-Christian Republic. He lowered the public Christian observance and raised the Islamic one. That is not interfaith courtesy. That is a preference.

106. He also used the presidency to restrain and threaten Israel and to protect Hamas from destruction. In 2014, during Israel’s war against Hamas in Gaza, he threatened Prime Minister Benjamin Netanyahu for an immediate halt to Israel’s offensive while Hamas remained armed,



and interrupted the Prime Minister to demand that Israel stop. In March 2014 he warned Netanyahu of “international fallout” if Israel did not accept Washington’s framework. Their relationship was notoriously strained if not outright bad. He would not let Israel finish the war against a designated terrorist organization. That is not neutrality. That is protection of the enemy this Indictment charges the enterprise with aiding. It is the same preference: Islamic arms preserved, the Jewish state, and home of Jesus, constrained.

107. By the June 2025 primary, Mamdani’s public record included BDS, an SJP chapter, refusal to condemn “globalize the intifada,” refusal to affirm Israel as a Jewish state, and the promise that New York would arrest Netanyahu.

108. After that primary, Barack Hussein Obama placed an unsolicited call to Mamdani. Adviser Patrick Gaspard said the call “was a very important signaler to many in the political establishment, the business establishment, to average voters that helped credential Zohran Mamdani.” The New York Times reported that he congratulated him, offered governing advice, and discussed “the importance of giving people hope in a dark time.”

109. On November 1, 2025, Barack Hussein Obama called again for about 30 minutes. He said, “Your campaign has been impressive to watch.” He said he was invested in Mamdani’s success, discussed staffing, and offered to serve as a “sounding board.” In April 2026 they met in person in the Bronx. The public record of those contacts contains no demand that Mamdani retract the arrest threat, the intifada slogan, the genocide charge, or BDS.

110. Barack Hussein Obama thereby joined the movement in the open. He knew who Mamdani was. He knew the record: arrest the Prime Minister of Israel, globalize the intifada, deny Israel’s



right to exist as a Jewish state as of right, BDS as the core of his politics. He called anyway. He met anyway. He offered to be a sounding board anyway. A former President of the United States conferred the prestige of that office on a Mayor whose words incite and cause violence against Jews in the city with the largest Jewish population in this country. He did not require a retraction. He did not break. He gave counsel, credentials, and cover. That is not commentary. That is joining. It is the harvest of the groundwork he laid in office: a closeted Muslim President made it possible for open Muslims—and for those who carry a Marxist-Islamist manifesto into City Hall and the Congress—to take power in this Republic without being disqualified by the record this Indictment recites. On or about August 8, 2026, Barack Hussein Obama spoke by telephone with El-Sayed after the Michigan primary. El-Sayed's campaign said they had a "warm encouraging discussion and look forward to working together." El-Sayed called the conversation "warm and inspiring." Obama did not require a break with Piker, with the CAIR circuit, or with the denial of Israel's right to exist as a Jewish state. On information and belief, Obama has been in contact with other Marxist and/or Islamist political candidates in the same vein as Mamdani and El-Sayed, including Angie Nixon, the Democratic Socialists of America nominee for the United States Senate in Florida, who said "Netanyahu is a war criminal who needs to answer to his crimes" and that she does not support sending "any money or any weapons to Israel." She has also said "Many of my colleagues have stated that folks are fearful of another massacre occurring to the Jewish people. Well, guess what? A massacre is occurring now. Entire bloodlines of Palestinians have been wiped away." She is therefore accusing Israel of genocide.

H. NOTICE, NETWORK, AND RESULTING HARM



111. The Accused spoke after October 7, 2023, after synagogues and Jewish schools had been attacked, and after Jewish organizations had stated in public what the slogans at issue mean. They spoke after Tlaib had been censured by the House for doubling down on a chant the resolution called a call to violence. They spoke after Greenblatt had called “globalize the intifada” an explicit call for violence and had condemned Piker. They spoke after New York’s major Jewish institutions had warned that Mamdani’s core positions were incompatible with their safety. They kept speaking. Jews in this country now live in constant, immediate fear of severe bodily injury or death. That fear is not an accident of tone. It is the foreseeable and intended product of the Accused’s words and of the network in which they operate. Laura Loomer, a female Jewish investigative journalist and high profile public figure, has received credible death threats in that same anti-Semitic climate. While the Accused did not issue those threats directly, they helped create the climate in which such threats are made.

112. Tlaib had been censured by the House for doubling down on a chant the resolution called a call to violence. Greenblatt had called “globalize the intifada” an explicit call for violence and had condemned Piker. New York’s major Jewish institutions had warned that Mamdani’s core positions were incompatible with their safety. Piker’s August 20–21, 2026 Twitch stream occurred after that notice, and after synagogue attacks on American soil.

113. Omar, Tlaib, and the Squad endorsed El-Sayed. Tlaib raised money for a Mamdani super PAC. Piker platformed Mamdani and campaigned with El-Sayed. Barack Hussein Obama credentialed Mamdani. This is not six separate speeches. It is one enterprise. Omar and Tlaib



endorsed Angie Nixon, the Democratic Socialists of America nominee for the United States Senate in Florida, who called Netanyahu a war criminal. Obama spoke with El-Sayed after the Michigan primary. On information and belief Obama has been in league with other Marxist Islamists, including but not limited to political candidates throughout the United States.

114. The enterprise is a web. The Accused support, appear with, raise money for, and take money from channels connected to CAIR and to Brotherhood-linked institutions. CAIR, in turn, sits in documented proximity to Hamas. Reasonable suspicion of that web is enough for this Grand Jury to act. Direct personal payments from these Accused to Hamas are not alleged because they are not shown. The pattern is the point: support the front, protect the front, amplify the front's politics, and the terror organization at the back of the web is the beneficiary.

115. In 2008, in the Northern District of Texas, a federal jury convicted the Holy Land Foundation for Relief and Development and five of its officers of providing material support to Hamas, in what remains the largest terrorism-financing prosecution in American history. Approximately \$12.4 million was found to have been funneled to Hamas. Ghassan Elashi, a founding board member of CAIR's Texas chapter, was among those convicted and was sentenced to 65 years in federal prison. Federal prosecutors listed CAIR and its founder Omar Ahmad as unindicted co-conspirators. FBI Special Agent Lara Burns testified that CAIR Executive Director Nihad Awad attended the 1993 Philadelphia meeting of Hamas officials and Palestine Committee figures. Awad had publicly declared in 1994, "I am in support of the Hamas movement." Holy Land shows how money and political cover have been funneled to Hamas through American organizations. The Accused's ties to CAIR are, in effect, proximity to Hamas.

116. The designations of Hamas, the Muslim Brotherhood, and CAIR are as set forth in



paragraph 8. The Accused work in concert with one another and with that designated milieu.

117. On July 23, 2026, Raul Morales was charged with two counts of attempted second-degree murder as a hate crime after stabbing a 57-year-old Asian man and a Jewish man in a kippah who had just left a synagogue. Prosecutors said he shouted “Allahu Akbar” and, near the synagogue, “Justice for Islam.” The attack occurred one day after Mamdani’s July 21–22 statements that Netanyahu is a war criminal, the architect of genocide, and not welcome in New York. That is incitement that causes violence. It is not coincidence. It is the climate the Mayor of New York incited and caused.

118. On May 21, 2025, two Israeli Embassy staff members—Yaron Lischinsky and Sarah Milgrim—were shot and killed outside the Capital Jewish Museum in Washington, D.C. That murder is of the kind this conspiracy makes more likely. It is among the deaths this Grand Jury charges as the foreseeable result of the enterprise. On June 1, 2025, Mohamed Sabry Soliman attacked a Run for Their Lives gathering in Boulder, Colorado, held to demand the release of the hostages taken by Hamas. He threw Molotov cocktails and used a makeshift flamethrower, shouting “Free Palestine,” “End Zionist,” and “How many children killed.” Thirteen people were burned. Karen Diamond, eighty-two, a member of Congregation Bonai Shalom, died of those burns on June 25, 2025. Soliman later told police he targeted the group because he believed they were Zionists. On March 12, 2026, Ayman Mohamad Ghazali rammed a vehicle into Temple Israel in West Bloomfield, Michigan, a synagogue with a preschool, and opened fire on security. One officer was injured. Ghazali died at the scene. Those attacks are of the kind this conspiracy makes more likely. They are among the deaths and near-deaths this Grand Jury charges as the foreseeable result of the enterprise, and there are many more examples.



III. COUNTS

COUNT ONE: INCITE AND CAUSE VIOLENCE AND SOLICITATION OF A CRIME OF VIOLENCE

*(18 U.S.C. § 373; COVERED WITHIN THE BROAD REACH OF THE FEDERAL CRIMINAL
LAW)*

119. The previous allegations of the entirety of this Indictment are repeated and re-alleged as if fully incorporated herein.

120. 18 U.S.C. § 373 makes it a crime, with intent that another person engage in conduct constituting a felony that has as an element the use, attempted use, or threatened use of physical force against the person of another, and under circumstances strongly corroborative of that intent, to solicit, command, induce, or otherwise endeavor to persuade such other person to engage in such conduct. Incitement and causing violence, as covered within the broad reach of the federal criminal law, is advocacy directed to producing lawless action against an identifiable class of persons, and which does produce that action and that fear.

121. The prosecution must show that the accused (a) solicited, commanded, induced, or endeavored to persuade another to commit a crime of violence, or engaged in a course of advocacy having that design and that result; (b) acted with the requisite intent; and (c) did so under circumstances strongly corroborative of that intent, including office, audience, notice, and repetition.



122. Under 18 U.S.C. § 2, whoever aids, abets, counsels, commands, induces, or procures the commission of an offense is punishable as a principal.

123. Piker, Mamdani, Omar, Tlaib, and El-Sayed did knowingly and willfully, from official and mass platforms, and working in concert with one another and with networks connected to CAIR, the Muslim Brotherhood, and Hamas, solicit, induce, and endeavor to persuade others to treat Jews, Israel, and those standing with the Jewish state as legitimate objects of force, by repeating, after notice, the vocabulary of intifada, “from the river to the sea,” dual loyalty, Holocaust inversion, Hamas preference, the branding of Israel and its prime minister as genocidal criminals, and—as to Piker—the August 20–21, 2026 declaration that “action” would be taken “against American Jews” and that Israel is “Jewish ISIS,” together with the genocidal statement that immigrants would “fuck your sister and then maybe even your daughter” and “destroy the white race.”

Those words incite and cause violence.

They put Jews in immediate fear of severe bodily injury or death.

124. Piker did so as the mass communicator of the manifesto, telling millions that “action” would be taken “against American Jews.” Mamdani did so from the office of Mayor of New York, including by stating that the City would arrest an allied head of government and, on July 21–22, 2026, that Netanyahu is a war criminal and not welcome in the City. Tlaib did so after the House had found that she doubled down on a call to violence, including by posting “from the river to the sea,” a call for the expulsion of Jews from Israel. Omar did so by circulating dual-loyalty and “hypnotized the world” libels and by maintaining the same factional alliance. El-



Sayed did so by denying Israel's right to exist as a Jewish state as a primary question, by answering a synagogue attack with "Hurt people hurt people," by treating opposition to Sharia as white supremacy, and by taking a campaign pipeline tied to Brotherhood-linked institutions.

125. Barack Hussein Obama did knowingly and willfully aid, counsel, and procure that campaign by placing repeated calls to Mamdani, meeting with him, offering to serve as a sounding board, and conferring presidential prestige that his adviser stated helped credential Mamdani, after Mamdani's record was public, and without requiring retraction of the statements herein. He likewise spoke with El-Sayed after the Michigan primary, without requiring a break with Piker or with the denial of Israel's right to exist as a Jewish state.

126. There is probable cause to believe and allege that the elements of this Count are satisfied as to each Accused.

COUNT TWO: RECKLESS ENDANGERMENT

(COVERED WITHIN THE BROAD REACH OF THE FEDERAL CRIMINAL LAW)

127. The previous allegations of the entirety of this Indictment are repeated and re-alleged as if fully incorporated herein.

128. Reckless endangerment, as covered within the broad reach of the federal criminal law, is committed when a person, by wanton or reckless conduct, creates a substantial risk of serious physical injury to another, or wantonly fails to reduce a risk he has helped to create. The accused need not have held the weapon. The risk charged here includes the actual attacks that followed.

129. The prosecution must show that the accused (a) engaged in wanton or reckless conduct, or



failed to exercise the care required by his office or platform; (b) thereby created or enlarged a substantial risk of serious physical injury; and (c) that the persons endangered were a foreseeable class.

130. The foreseeable victim class was Jews, synagogue-goers, and persons marked as Zionist or as standing with Israel.

131. Piker, Mamdani, Omar, Tlaib, and El-Sayed did knowingly and willfully, and in the alternative wantonly and recklessly, create that risk by repeating from official and mass platforms, after notice, slogans and accusations that had already been identified as calls to violence, including by the House of Representatives, the ADL, and the major Jewish institutions of New York. Piker enlarged that risk on or about August 20–21, 2026, by telling a mass audience that “action” would be taken “against American Jews” and by labeling Israel “Jewish ISIS.”

132. Barack Hussein Obama did knowingly and willfully, and in the alternative wantonly and recklessly, enlarge that risk by credentialing Mamdani after that record was known, by offering continuing private counsel, and by failing to require a break with the statements that created the risk.

133. The July 23, 2026, stabbings outside a New York synagogue occurred one day after Mamdani’s July 21–22 statements and are of the kind of harm this conduct incited and caused. The May 21, 2025 murders outside the Capital Jewish Museum, the June 25, 2025 death of Karen Diamond in Boulder and the March 12, 2026 attack on Temple Israel in West Bloomfield are of the same kind.

134. There is probable cause to believe and allege that the elements of this Count are satisfied as

to each Accused.

**COUNT THREE: SEDITIOUS CONSPIRACY AND ADVOCACY OF FORCE AGAINST
THE AUTHORITY OF THE UNITED STATES**

(18 U.S.C. §§ 2384, 2385)

135. The previous allegations of the entirety of this Indictment are repeated and re-alleged as if fully incorporated herein.

136. 18 U.S.C. § 2384 provides that if two or more persons conspire to overthrow, put down, or destroy by force the Government of the United States, or to oppose by force the authority thereof, or by force to prevent, hinder, or delay the execution of any law of the United States, they shall be guilty of seditious conspiracy.

137. 18 U.S.C. § 2385 makes it a crime to knowingly or willfully advocate, abet, advise, or teach the duty, necessity, desirability, or propriety of overthrowing or destroying the government of the United States by force or violence, or to organize, help, or attempt to organize any group or assembly of persons who teach, advocate, or encourage the same.

138. The prosecution must show that the accused (a) agreed with one or more others to oppose by force the authority of the United States, or advocated, abetted, or taught the desirability of force against that authority or against the public order it is bound to maintain; and (b) did so knowingly and willfully.

139. The United States recognizes the State of Israel. It has not ratified the Rome Statute. It does not recognize the ICC warrant against Prime Minister Netanyahu. It is bound to execute its own



laws on its own soil and to protect persons within its jurisdiction from politically and religiously motivated violence. That protection is not optional.

140. The Accused did knowingly and willfully conspire, and did advocate, abet, and teach, a project to oppose that authority: namely, to make an American city the instrument of a foreign tribunal, to circulate a politics of intifada and of the destruction of the Jewish state, to treat Hamas as a moral peer or superior, and—as to Piker—to instruct a mass audience that “action” against American Jews who support Israel would follow and that Israel is “Jewish ISIS,” thereby hindering the execution of the laws and foreign policy of the United States and the protection of Jews on American soil.

141. The principal governmental act is Mamdani’s campaign to have the City of New York enforce a foreign court’s process against an allied head of government. Piker supplied the manifesto and the recruits. The remaining Accused supplied the ideology, the money, the stages, and the recruiting vocabulary. Barack Hussein Obama knowingly and willfully counseled and credentialed the mayor who carried the governmental act.

142. There is probable cause to believe and allege that the elements of this Count are satisfied as to each Accused.

**COUNT FOUR: INSURRECTION AGAINST THE UNITED STATES AND THE U.S.
CONSTITUTION**

143. The previous allegations of the entirety of this Indictment are repeated and re-alleged as if fully incorporated herein.



144. The primary federal criminal statute for insurrection is 18 U.S.C. § 2383, which prohibits rebellion or insurrection against the authority of the United States or its laws:

Whoever incites, sets on foot, assists, or engages in any rebellion or insurrection against the authority of the United States or the laws thereof, or gives aid or comfort thereto, shall be fined under this title or imprisoned not more than ten years, or both; and shall be incapable of holding any office under the United States.

145. The authority of the United States includes the Constitution, the foreign policy of the United States, and the duty to protect persons within its jurisdiction from politically and religiously motivated violence. Mamdani set on foot a campaign to make the City of New York the instrument of a foreign tribunal the United States does not recognize, against an allied head of government the United States does recognize. That is opposition to the authority of the United States and to the laws thereof. Piker supplied the manifesto and the recruits. Omar, Tlaib, and El-Sayed supplied the vocabulary of intifada, dual loyalty, and “from the river to the sea,” a call for the expulsion and killing of Jews. Barack Hussein Obama gave aid and comfort to that campaign by credentialing the Mayor after the record was public. The Accused incite and cause violence as the method of that insurrection. Jews live in immediate fear of it. There is probable cause to believe and allege that the elements of this Count are satisfied as to each Accused.

COUNT FIVE: LOGAN ACT UNAUTHORIZED PRIVATE FOREIGN POLICY

146. The previous allegations of the entirety of this Indictment are repeated and re-alleged as if fully incorporated herein.



147. 18 U.S.C. § 953 proscribes:

Any citizen of the United States, wherever he may be, who, without authority of the United States, directly or indirectly commences or carries on any correspondence or intercourse with any foreign government or any officer or agent thereof, with intent to influence the measures or conduct of any foreign government or of any officer or agent thereof, in relation to any disputes or controversies with the United States, or to defeat the measures of the United States, shall be fined under this title or imprisoned not more than three years, or both.

148. The Logan Act forbids a citizen, without authority of the United States, from commencing or carrying on correspondence or intercourse with a foreign government or its officers with intent to influence that government's conduct or to defeat the measures of the United States. Mamdani, from the office of Mayor, put the City law department into "active conversation" about arresting the Prime Minister of Israel on a warrant issued by a tribunal the United States has never recognized, in order to deliver him to The Hague. That is unauthorized private foreign policy, executed with the machinery of an American city, intended to defeat the measures of the United States toward an ally. Tlaib and Omar have pursued the same foreign policy from the House: an arms embargo, BDS, the branding of Israel as apartheid and genocide. BDS is itself a private foreign policy forbidden by statute and Executive Order. The Accused have no authority from the United States to conduct it. There is probable cause to believe and allege that the elements of this Count are satisfied as to each Accused.

COUNT SIX: TREASON IN TIME OF WAR



149. The previous allegations of the entirety of this Indictment are repeated and re-alleged as if fully incorporated herein.

150. When the Constitution was written and ratified, modern mass-scale warfare was not the most common type of war. Rather, summer campaigns, skirmishes, and guerrilla raids were a frequent form of warfare.

151. In 1979, the Government of Iran was overthrown in a revolution by radical Islamic Jihadists. (Note that the prior government was also Islamic but the 1979 revolution was by a fanatical sect determined to convert or kill the entire human race.)

152. The conspiratorial network of Hasan Doğan Piker, Zohran Kwame Mamdani, Ilhan Abdullahi Omar, Rashida Harbi Tlaib, Abdulrahman El-Sayed, and Barack Hussein Obama is signaling—if not directing—the Islamic Republic of Iran. Since 1979, Iran has waged war on the United States of America and all of the West through octopus-like arms of “proxies” for plausible deniability. Iran has continuously been at war with the USA for 47 years, although attempting to do so deceitfully and from the shadows. That war is now open against the President and his family. Iranian state media and IRGC-affiliated outlets have threatened the President, Ivanka Trump, Barron Trump, and Jared Kushner. In July 2026, Tehran displayed “Blood for Blood” murals of the President, Ivanka Trump, Barron Trump, and others of the family above coffins. In August 2026, Iranian state television aired “Where to kill Barron Trump?”; the United States Secret Service confirmed it was aware of the video. Ivanka Trump, who converted to Judaism, and Jared Kushner have been the subject of a reported IRGC-linked plot against the Florida household they share. These six Accused mass-communicate the same enemy, the same targets, and the same permission structure: Hamas as moral peer or superior, Jews and the Jewish state as

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**COUNT SEVEN: INVOLUNTARY MANSLAUGHTER RESULTING FROM
CONSPIRACY**

155. The previous allegations of the entirety of this Indictment are repeated and re-alleged as if fully incorporated herein.

156. The Accused individuals are co-conspirators.

157. A criminal conspiracy exists when two or more people agree to act in concert (perhaps performing different roles towards the same ends) to do an unlawful act, obtain an unlawful result, or to obtain a lawful result in an unlawful manner. Mere words are not enough to establish a criminal conspiracy. See: "Federal Conspiracy Law: A Brief Overview," Congressional Research Service, CRS R41223.

158. Some overt act must be shown toward implementation of the conspiracy. However, the relationship of the act to the conspiracy's aims is treated as very flexible.

159. Federal criminal conspiracy under 18 U.S.C. § 371 requires proof of an agreement between two or more people to commit a federal crime or defraud the government, joined by intent and an overt act.

160. Members of the conspiracy are also liable for the foreseeable crimes of their co-conspirators committed in furtherance of the common plot.

161. It is reasonably foreseeable, especially in light of a decade of violence, riots, executions, and armed invasions of churches and synagogues, that deaths will result and indeed have resulted from the Accused's conspiracy. The Accused incite and cause that violence.



162. This includes but is not limited to the May 21, 2025 shooting, when two Israeli Embassy staff members—Yaron Lischinsky and Sarah Milgrim—were shot and killed outside the Capital Jewish Museum in Washington, D.C. It includes the June 25, 2025 death of Karen Diamond from the Boulder firebombing and the March 12, 2026 attack on Temple Israel in West Bloomfield, Michigan.

163. There is probable cause to believe and allege that the elements of this Count are satisfied as to each Accused.

A TRUE BILL

Foreman of the Citizens' Grand Jury

Dated this 5 day of SEPTEMBER, 2026.


LARRY KLAYMAN

Citizens' Grand Jury Prosecutor

Chairman, Freedom Watch USA

Angeled



*UNANIMOUS VERDICT
ALL Nine Jurors.*

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