

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

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Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN and DEMOCRATIC
PEOPLE'S REPUBLIC OF KOREA,

Defendants.

Case No.: 1:25-cv-601

**COMPLAINT FOR VIOLATION OF
THE FOREIGN SOVEREIGN IMMUNITIES ACT**

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INTRODUCTION

1. This lawsuit seeks damages under the Foreign Sovereign Immunities Act, 28 U.S.C. § 1605A, against Defendants Iran and North Korea on behalf of American service members and civilians, and their family members, who were killed or wounded in terrorist attacks while serving their country in Iraq, Syria, Israel, and Kenya between 2019 and 2023.

2. While these individuals worked to rebuild post-war Iraq, defeat the Islamic State of Iraq and al-Sham (“ISIS”) in Syria, and support key American allies like Kenya and Israel, they were attacked by terrorists armed with material support and resources from the Islamic Republic of Iran (“Iran” or “Iranian regime”) and the Democratic People’s Republic of Korea (“DPRK,” “North Korea,” or “North Korean Regime”).

3. Ever since the 1979 revolution that brought to power Ayatollah Khomeini, the Iranian regime acting through its officials, employees, and/or agents—including the Foundation for the Oppressed, the Supreme Leader’s Office, and the Islamic Revolutionary Guard Corps (“IRGC”)—has sought to export its revolution by sponsoring terrorist attacks targeting the United States in the Middle East. Together, these Iranian terrorist sponsors and their North Korean allies participated in a global terrorist alliance led by Iran—the “Axis of Resistance”—that sought to use terrorism to undermine American foreign policy, including attempting to coerce U.S. government decisionmakers in the U.S. Department of Defense (“DoD”) at the Pentagon, which is located in the Eastern District of Virginia, and elsewhere.

4. The attacks that killed or injured Plaintiffs were committed by Iran’s terrorist proxies and agents, all of whom were members of the Axis of Resistance: Hizballah (also spelled “Hezbollah”), the IRGC, Jaysh al-Mahdi (“JAM”), Harakat al-Muqawama al-Islamiya (“ Hamas”), Palestinian Islamic Jihad (“PIJ”), and al-Qaeda (also spelled “al-Qaida”). Material

support or resources for the attacks were provided by Iran and its terrorist agents, as well as by North Korea, acting through agents that included the DPRK's Reconnaissance General Bureau ("RGB") and the same Axis members. Such aid included supplying arms for attacks, training terrorists how to attack Americans, and providing incentive payments and other financing to terrorists for killing and maiming Americans.

5. Plaintiffs seek relief against Iran and North Korea under the terrorism exception of the Foreign Sovereign Immunities Act, which authorizes any U.S. national, member of the armed forces, U.S. government employee or contractor, or legal representative of such person to recover against a designated State Sponsor of Terrorism for personal injury or death caused by an act of extrajudicial killing, aircraft sabotage, or hostage taking, or the provision of material support or resources to such act, by an official, employee, or agent of the state. Plaintiffs' injuries resulting from the attacks at issue were reasonably foreseeable or natural consequences of both Defendants' conduct. Iran and North Korea are each designated as a State Sponsor of Terrorism, and each is jointly and severally liable for the attacks that killed or injured Plaintiffs.

6. U.S. Administrations of both parties, on a bipartisan basis, have identified Iran and North Korea as key sponsors of terrorism. President Barack Obama, for example, expressed "no illusions" that "the Iranian government . . . supports terrorist organizations like Hezbollah" and other "proxy groups who killed our troops in Iraq," and "for decades," has "always found a way to fund these efforts."¹ President Joseph Biden recognized that "Iranian-supported terrorist group[]" Hizballah was "responsible for killing hundreds of Americans over a four-decade reign of terror."² Most recently, President Donald Trump reiterated in a National Security Presidential

¹ White House, *Remarks by the President on the Iran Nuclear Deal* (Aug. 5, 2015).

² White House, *Statement from President Joe Biden on the Death of Hassan Nasrallah* (Sept. 28, 2024).

Memorandum (NSPM-2) in February 2025 that “Iran’s behavior threatens the national interest of the United States” and emphasized that it has acquired new urgency in light of Iran’s “responsibility for the horrific Hamas massacres committed on October 7, 2023,” and for continued aid to “Hezbollah, Hamas, the Houthis, the Taliban, al-Qa’ida, and other terrorist networks,” among other malign activities, and the President has accordingly declared it the policy of the United States to enact “maximum pressure” on Iran, including “all available legal steps to . . . help American victims of terrorism, including Gold Star Families, collect on Federal judgments against Iran.”³ A similar bipartisan consensus has also confirmed that North Korea supported terrorism from at least 2017 through 2023.⁴

7. Congress has codified its finding that Iran and North Korea sponsor terror. Since 2019, for example, the U.S. Code has identified “Iran” and “North Korea” as states that engage in “[i]ncitement and offensive counterintelligence,” “[a]ssassinations,” and “[t]errorist acts” as “activities intended to influence a person or government.” 50 U.S.C. § 3369d (Dec. 20, 2019).

8. It is the “long-standing policy of the United States that civil lawsuits against those who support, aid and abet, and provide material support for international terrorism serve the national security interests of the United States by deterring the sponsorship of terrorism and by advancing interests of justice, transparency, and accountability.” Sudan Claims Resolution Act, Pub. L. No. 116-260, div. FF, tit. XVII, § 1706(a)(1), 134 Stat. 3294 (2020).

³ White House, *National Security Presidential Memorandum/NPSM-2* (Feb. 4, 2025).

⁴ See, e.g., U.S. Dep’t of State, *Country Reports on Terrorism 2019* at 198 (June 2020); U.S. Dep’t of State, *Country Reports on Terrorism 2022* at 205 (Nov. 2023).

THE PARTIES

9. Defendant Iran was designated as a State Sponsor of Terrorism in 1984 pursuant to section 6 of the Export Administration Act of 1979 (50 U.S.C. § 4605), section 620A of the Foreign Assistance Act of 1961 (22 U.S.C. § 2371), and section 40 of the Arms Export Control Act (22 U.S.C. § 2780), and has remained so designated ever since. Iran’s officials, employees, or agents included Hizballah, the IRGC, and the Islamic Revolutionary Guard Corps-Qods Force (“IRGC-QF” or “Qods Force”), Foundation for the Oppressed on Earth (“Foundation for the Oppressed” or “Foundation”), Supreme Leader’s Office (“SLO”), Hamas, PIJ, JAM (including JAM Special Group Kataib Hizballah (“KH”)), and al-Qaeda (including al-Shabaab), and the North Korean security services, including the RGB, among others. Many of Iran’s officials, employees, or agents are designated as Foreign Terrorist Organizations (“FTOs”) under section 219 of the Immigration and Nationality Act (8 U.S.C. § 1189), Specially Designated Global Terrorists (“SDGTs”) under 31 C.F.R. § 594.310, or as agencies, instrumentalities, or persons providing material support to such organizations under other authorities.

10. Defendant North Korea was designated as a State Sponsor of Terrorism in 1988 pursuant to the same authorities as Iran, and remained continuously designated from 1988 until late 2008, when the United States de-listed North Korea as part of an ultimately unsuccessful attempt to reach a nuclear deal with the DPRK. “On November 20, 2017, the Secretary of State designated [North Korea] as a State Sponsor of Terrorism” after the Secretary “determined [that] the DPRK had repeatedly provided support for acts of international terrorism in the nine years since its designation had been rescinded,”⁵ and North Korea has remained so designated ever since. North Korea’s officials, employees, or agents included Hizballah, the IRGC, Hamas, PIJ,

⁵ U.S. Dep’t of State, *Country Reports on Terrorism 2022* at 205 (Nov. 2023).

and al-Qaeda (including al-Shabaab). Many of North Korea's officials, employees, or agents are designated as FTOs under section 219 of the Immigration and Nationality Act (8 U.S.C. § 1189), SDGTs under 31 C.F.R. § 594.310, or as agencies, instrumentalities, or persons providing material support to such organizations under other authorities.

11. Plaintiffs are 48 direct and indirect victims of terrorist attacks committed from 2019 to 2023. In this terminology, direct attack victims are those who were physically injured or killed in the attacks. Indirect attack victims are the direct attack victims' close family members who suffered financially and emotionally because of the attacks. They include spouses, children, parents, siblings, and other close relations of the direct attack victims. Each Plaintiff is either a U.S. national or the estate, survivor, or heir of a U.S. national.⁶ All Plaintiffs bring claims against both Iran and North Korea (Count One).

JURISDICTION AND VENUE

12. This Court has personal and subject-matter jurisdiction over Plaintiffs' claims under 28 U.S.C. §§ 1330(a), 1330(b), 1331, 1332(a)(2), and 1605A.

13. 28 U.S.C. § 1605A(c) provides a private right of action against a State Sponsor of Terrorism for personal injury or death caused by an act of torture, extrajudicial killing, aircraft sabotage, hostage taking, or the provision of material support or resources for such acts. The foreign state is liable for the acts of its officials, employees, or agents acting within the scope of their office, employment, or agency.

⁶ As used herein, "estate" means established estates, anticipated estates, as well as certain estate-like constructs available under the laws of certain States (such as "heirships"). The process of establishing certain estates is ongoing, and the identified family members or other individuals, as the anticipated personal representatives, bring these claims on behalf of the anticipated estates of such decedents and all heirs thereof. Each person so identified reserves all rights, including the right pursuant to Fed. R. Civ. P. 25, to seek to substitute for itself the decedent's estate, any successor thereto, or any subsequently named and/or designated estate representative.

14. Venue is proper in the Eastern District of Virginia under 28 U.S.C. § 1391(f)(1) because a substantial part of the events giving rise to the claims occurred in this District. Iran and North Korea sourced funds, intelligence, and technologies from, among other places, this District, which enabled Defendants' terrorist attacks. Such activities include, among others: (1) the terrorist attacks supported by Iran and North Korea were intended to have an impact in this District by terrorizing officials, as well as servicemembers and their families, residing in this District who were responsible for developing and/or executing U.S. policy in the Middle East (including, at the DoD, *e.g.*, Pentagon), which is located in this District (*infra* ¶¶ 68-70 (Iran); ¶¶ 166-68 (DPRK)); (2) events in this District, including DoD's targeting of former Qods Force commander Qasem Soleimani (deceased), were used as justification for certain terrorist attacks that give rise to the claims; (3) Iran (through its agent Hizballah) and North Korea each committed cigarette smuggling- and intellectual property-related crimes within this District that created substantial funds for attacks (*infra* ¶ 78 (Iran); ¶¶ 170-72 (DPRK)); (4) acting as Iran's agent, Hizballah, through its facilitator Ayman Joumaa, a publicly-charged fugitive in the Alexandria Division of this District (Case No. 1:11-cr-00560), targeted the United States to source support for its global terror operations (*infra* ¶ 79); (5) Iran and North Korea, inclusive of their agents, each conducted one or more lengthy cyber-crime schemes to steal sensitive data from defense contractors, and DoD components, officials, and servicemembers residing in this District, including, but not limited to, the Pentagon (*infra* ¶ 80 (Iran); ¶ 169 (DPRK)); and (6) acting as Iran's agent, Hizballah illegally used digital infrastructure to enable terrorist operations that was, on information and belief, in whole or in part located in this District (*infra* ¶¶ 81-85).

FACTUAL ALLEGATIONS

I. The Iranian Regime Has Created a Vast Infrastructure to Facilitate Terrorist Attacks Targeting the United States in the Middle East.

15. Since the Islamic Revolution that overthrew the Shah of Iran in 1979, radical Shia terrorists in the Middle East pledged, before Allah, their personal oath of allegiance not to their own nation, but instead to a Shiite Ayatollah who became the first Supreme Leader of the Islamic Revolution: Ayatollah Ruhollah Khomeini. They pledged to support the Ayatollah's embrace of violent attacks targeting the enemies of the "Islamic Revolution"—most of all, the United States (the "Great Satan") and its allies in the Middle East, including Israel (the "Little Satan"). Their shared objective was to force the Great Satan to exit the region and abandon its allies there through an unrelenting campaign of attacks against Americans.

16. To advance this core objective of the Islamic Revolution, the Iranian regime developed a vast infrastructure of institutions organized within their government to facilitate terrorist attacks by proxies throughout the region. In its scope, scale, and single-minded focus, it amounted to a terrorism machine.

17. Iran's terrorism machine consisted of three primary components described in this section. First, certain Iranian institutions, which Plaintiffs refer to collectively as Iran's "**Terrorist Sponsors**," were at the center of the terrorism machine: (1) the Foundation for the Oppressed; (2) the Islamic Revolutionary Guard Corps (IRGC), including its Qods Force (often abbreviated IRGC-QF); (3) Hizballah; and (4) Ayatollah Ali Khamenei (the second Supreme Leader of Iran) and the Supreme Leader's Office. At all relevant times, the Terrorist Sponsors operated as Iran's most important sponsors of terrorist attacks that targeted the United States. A second key component of the terrorism machine were terrorist groups that acted as Iran's **proxies** for facilitating and committing attacks, collectively known as the "**Axis of Resistance**"—which

term Iran devised to emphasize their shared hostility towards the United States. A third component were **joint cells**, which the Terrorist Sponsors used to integrate the components of the terrorism machine, coordinating proxies' terrorist attacks through a joint leadership cell referred to as the Khamenei Cell, as well as various logistics and operations cells.

A. The Terrorist Sponsors, Acting as Agents of Iran, Have Dedicated Themselves to Facilitating Terrorist Attacks.

18. At all relevant times, the Foundation for the Oppressed, IRGC, Hizballah, Supreme Leader's Office, and each of their members was an official, employee, or agent of Iran, and facilitating terrorist attacks was within the scope of their office, employment, or agency.

19. Throughout the relevant period, the Terrorist Sponsors, through the Khamenei Cell (*infra* at ¶¶ 61-65), had vast financial needs to sustain, and intensify, their sponsored attacks targeting the United States. In 2018, for example, the U.S. Department of State ("State") reported that Iran spent at least several billion dollars per year funding Axis of Resistance proxy attacks.⁷ Iran used the following key organizations to fund and facilitate terrorist attacks.

1. Foundation for the Oppressed (*Bonyad Mostazafan*)

20. On March 5, 1979, the Supreme Leader's Office and terrorist militias (that would eventually become the IRGC) seized the Pahlavi Foundation—the Shah's global charitable foundation with assets and facilities all over the world—as well as the assets of Jews, Bahais, and other religious minorities, which they pooled together and renamed the Foundation for the Oppressed on Earth, a/k/a *Bonyad Mostazafan* ("Foundation for the Oppressed"). That name boldly announced the new purpose to which they were devoting the Shah's vast wealth: exporting their Islamic Revolution to benefit the "Oppressed on Earth"—*i.e.*, terrorist attacks

⁷ U.S. Dep't of State, *Outlaw Regime: A Chronicle Of Iran's Destructive Activities*, at 11 (Sept. 2018) ("*Outlaw Regime*, 2018 ed.").

targeting the United States and its allies. For Khomeini, the “Oppressed on Earth” comprised Muslims in countries who needed to be “liberated” through Khomeini-sponsored terrorist violence, and his newly seized Foundation was intended for that purpose. To that end, Khomeini installed his most trusted terrorist supporters on the board of the Foundation for the Oppressed from inception, including Ali Khamenei. From inception, and ever since, the Foundation has been inextricably connected to, and a vehicle for, the terrorist leaders who provided the muscle for Khamenei’s terrorist agenda.

21. The Foundation for the Oppressed was custom-built to provide funding, weapons, intelligence support, logistical aid, and a vast transnational footprint of corporate fronts, shell companies, and real estate to the IRGC Qods Force and Hizballah. This was part of Khamenei’s early efforts to build the financial and logistical networks needed to export the Islamic Revolution through Iranian proxy terrorist attacks targeting the United States and its allies, including Israel. Such Khamenei-allied terrorists used the Foundation for the Oppressed to help the IRGC, Hizballah, and other terrorist proxies acquire funds, weapons (including components), intelligence, cover, concealment, and logistical aid to commit attacks.

22. Hizballah exercised control of the Foundation alongside the Qods Force and SLO. Hizballah used its control of the Foundation to sponsor terrorist proxy attacks. In 2001, for example, *BBC* reported that “the Foundation for the Oppressed ... is an organization that gives financial support to Iran’s ... acts of terrorism abroad” that “is supervised by ... Ayatollah Khamene’i” and “is a subsidiary of the IRGC” whose investments are “under the control of Hezbollah like other large commercial enterprises in Iran ... operating under the supervision of

the IRGC” while “under the guise of cultural centres and humanitarian structures.”⁸ That characterization has remained accurate throughout the period from 2000 through the present.

23. The Foundation for the Oppressed comprised a terrorist operations slush fund for Hizballah, the Qods Force, and their proxies. Although the Foundation’s inner workings were notoriously opaque, its opacity only confirmed its terrorist operations purposes; it was the blackest hole in the Iranian regime, controlled exclusively by Khamenei and his inner circle. The Foundation’s terrorist operations slush fund role was complemented by the Terrorist Sponsors’ custom and practice, and tactics, techniques, and procedures. Among other ways, the Foundation was used as a terrorist finance and logistics aggregator and aggregation site for an array of streams of financial and logistical support from IRGC- and SLO-controlled organizations and firms.⁹ As such, Khamenei, the Qods Force, and Hizballah used the Foundation to optimize their conversion of the Terrorist Sponsors’ commercial profits into proxy attacks targeting Americans.

24. Decades of official reports and statements published by official actors from the United States, United Kingdom, Iran, European Union, and United Nations confirmed that the Foundation for the Oppressed played a key role in propagating Hizballah- and IRGC-sponsored terrorism, including their sponsored attacks by JAM in Iraq and Hamas in Israel, among others.¹⁰

⁸ BBC Int’l Reports, *Iranian Companies Operating in Azerbaijan Affiliated to Guards Corps* (Mar. 27, 2001).

⁹ See U.S. Dep’t of the Treas., *Treasury Targets Vast Supreme Leader Patronage Network and Iran’s Minister of Intelligence* (Nov. 18, 2020) (Khamenei and inner circle used Foundation to aggregate); Fin. Action Task Force, *FATF Report: Emerging Terrorist Financing Risks*, at 11-12, 44 (Oct. 2015) (terrorist aggregation enables attacks).

¹⁰ See, e.g., U.S. Dep’t of State, *International Narcotics Control Strategy Report: Volume II Money Laundering and Financial Crimes* at 221 (Mar. 2007); White House, *Remarks by President Trump to the 73rd Session of the United Nations General Assembly* (Sept. 25, 2018); U.S. Dep’t of the Treas., *Testimony of Pat O’Brien, Assistant Secretary Office of Terrorist Financing and Financial Crimes U.S. Department of the Treasury Before the Senate Committee on Banking, Housing, and Urban Affairs* (June 22, 2006); Hassan Rahimian (2010), *quoted in*

25. Indeed, a leaked 2006 State cable—which was widely published by the media thereafter—confirmed how the Foundation for the Oppressed enabled Iran-sponsored acts of terrorism. The cable documented how the U.S. Department of the Treasury (“Treasury”) Under Secretary for Terrorism and Financial Intelligence discussed with Turkish officials “Iran’s use of the international financial system to transfer funds to terrorists,” and in particular, “the Islamic Revolutionary Guard Corps (IRGC) increasing its role in the Iranian economy,” while a Turkish official “described the important role of Bonyads,” and said that “the Revolutionary Guard’s share of Bonyad-controlled business was increasing.”¹¹ The Under Secretary “cautioned that the IRGC’s growing role in the Iranian economy was not limited to the public sector, but included the private sector as well,” and he stated that “IranCell, Iran’s leading telecom company, is fully owned by the IRGC.”¹² (The IRGC-led Foundation effectively owned and managed IranCell.)

26. United States sanctions against the Foundation for the Oppressed confirmed that the IRGC and SLO used the Foundation’s profits, personnel, facilities, and resources to sponsor attacks targeting the United States, including attacks targeting regime enemies. On November 18, 2020, for example, the United States imposed counterterrorism sanctions on the Foundation

Jeffrey Goldberg, *The Iranian Regime on Israel’s Right to Exist*, The Atlantic (Mar. 9, 2015); European Union, *Council Implementing Regulation (EU) No 668/2010 of 26 July 2010 Implementing Article 7(2) of Regulation (EC) No 423/2007 Concerning Restrictive Measures Against Iran*, Official J. of the E.U. (July 27, 2010); Sean J. Corrigan, *Exploitable Vulnerabilities of Iran’s Islamic Revolutionary Guard Corps* at 34-35 (Dep’t of Def., Def. Tech. Info. Ctr. Oct. 2011); Aftab, *Rafiqdoost: The Ownership of the Property of the Mostazafan Foundation is in the Hands of the Jurist* (Nov. 3, 2012); U.N. Sec. Council, *Final Report Of The Panel Of Experts Established Pursuant To Resolution 1929 (2010)* ¶ 71 (June 1, 2015); Dr. Ali Ansari, *quoted in U.K. House of Lords, Int’l Relations Select Comm., The Transformation of Power in the Middle East and Implications for UK Policy*, Oral & Written Evidence (Nov. 2, 2016).

¹¹ U.S. Dep’t of State, Cable, *U/S Levey Seeks Turkish Cooperation Against Iranian Terrorism Finance & Nuclear Proliferation* (Dec. 18, 2006) (as published online).

¹² *Id.*

pursuant to Executive Order 13876.¹³ In the same designation, Treasury confirmed that the Foundation for the Oppressed served primarily as a front for terror and performed little legitimate charitable work: “[w]hile the Supreme Leader enriches himself and his allies, the Foundation’s primary mission to care for the poor has become a secondary objective.”¹⁴

27. The Foundation for the Oppressed “maintain[ed] close ties to the IRGC” and always served as a “bridge to the IRGC” through the Foundation’s “vast economic wealth” that was “partly the result” of “business with ... those involved with Iran’s support of international terrorism” including trade with “IRGC” fronts that were “designated under ... counterterrorism authorities.”¹⁵ In such role, the Foundation always served to “line the pockets of [Ayatollah Khamenei’s] allies,” including Parviz Fattah, who was appointed to lead the Foundation “in July 2019,” after previously serving as, *inter alia*, “managing director of the IRGC-linked Bonyad Taavon Sepah” and “head of the Imam Khomeini Relief Committee, whose Lebanon branch was designated pursuant to counterterrorism authorities in 2010 for being owned or controlled by, and for providing financial and material support to, Hizballah.”¹⁶ “Known for his loyalty to the Supreme Leader, Fattah has also forged ties to senior IRGC-Qods Force ... officials,” including “former IRGC-QF commander Qassem Soleimani.”¹⁷ Indeed, “Soleimani sought Fattah’s assistance to finance the Fatemiyoun Brigade, an IRGC-QF-led militia composed of Afghan migrants and refugees in Iran coerced to fight ... including children as young as 14 years old,” which, “like the IRGC-QF itself, is designated pursuant to both counterterrorism and human

¹³ U.S. Dep’t of the Treas., *Treasury Targets Vast Supreme Leader Patronage Network and Iran’s Minister of Intelligence* (Nov. 18, 2020).

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ *Id.*

rights authorities.”¹⁸ Iran also used the Foundation’s “assets” to finance designated terrorists who served in “the Supreme Leader’s inner circle” including “Gholam-Ali Haddad-Adel, a Khamenei confidant,” whom the U.S. sanctioned in 2019 under counterterrorism authorities.¹⁹

28. “While” the Foundation was “ostensibly a charitable organization charged with providing benefits to the poor and oppressed, its holdings [were] expropriated from the Iranian people and are used by ... Ali Khamenei to ... persecute the regime’s enemies.”²⁰ As the U.S. Treasury Secretary observed when the U.S. sanctioned the Foundation in 2020, “Iran’s Supreme Leader use[d]” the Foundation “to reward his allies under the pretense of charity” by using it as a “revenue generating source[] that enable[d] the regime’s ongoing repression of its own people.”²¹ On January 13, 2021, Treasury imposed more sanctions on *bonyads*, and again confirmed the Foundation for the Oppressed’s role in Khamenei-sponsored terrorism,²² which was usually led by Hizballah and the Qods Force.

2. Islamic Revolutionary Guard Corps (IRGC)

29. Since April 1979, the IRGC—also known as the “Sepah” and “Pasdaran,” “Guards,” and “Corps,” and “Guardians”—has operated as a global terrorist organization.

30. The IRGC’s primary mission was—and is—to target the United States for terrorist violence. Since 1979, the IRGC regularly engaged in and supported terrorist attacks directed at the United States, seeking to coerce the U.S. government into changing U.S. policy, including by prompting America’s exit from the Middle East and abandonment of its allies there, including Israel, and by deterring, degrading, and destroying U.S.-origin sanctions against Iran.

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ *Id.*

²¹ *Id.* (quoting Steven Mnuchin).

²² U.S. Dep’t of the Treas., *Treasury Targets Billion Dollar Foundations Controlled by Iran’s Supreme Leader* (Jan. 13, 2021).

31. When the IRGC targeted the United States, it used channels that were intended to obscure its role and thus supply plausible deniability for Iran. This was to prevent the IRGC's terrorist violence from escalating into armed conflict between America and Iran. Accordingly, IRGC doctrine has focused on conducting attacks through proxies.

32. The United States has confirmed that the IRGC is a terrorist organization. In 2007, Treasury designated the IRGC Qods Force under Executive Order 13224 for its support of terrorism, including its sponsorship of attacks by Hizballah, Hamas, PIJ, and JAM, among others, based upon Treasury's finding that the Qods Force was "seeking to inflict casualties on U.S. ... forces" and "had a long history of supporting Hizballah's military, paramilitary, and terrorist activities, providing it with guidance, funding, weapons, intelligence, and logistical support" and continued to do so, and "provide[d] lethal support" to "Iraqi Shi'a militants who target and kill Coalition and Iraqi forces"—all of which efforts relied upon joint Qods Force-Hizballah cells including "Qods Force operate[d] training camps for Hizballah in Lebanon's Bekaa Valley" and "more than 3,000 Hizballah fighters at IRGC training facilities in Iran."²³

33. In 2019, the U.S. designated the entire IRGC—including the IRGC-QF, IRGC Basij, and IRGC-IO (Intelligence Organization)—as an FTO. That designation, according to State, was in direct response to, *inter alia*, Iran's historic and "continue[d]" use of the IRGC to "provide financial and other material support, training, technology transfer, advanced conventional weapons, guidance, or direction to a broad range of terrorist organizations, including Hizballah, Palestinian terrorist groups like Hamas and Palestinian Islamic Jihad, Kata'ib Hizballah in Iraq," and "other terrorist groups in Syria and around the Gulf"; and

²³ U.S. Dep't of the Treas., *Fact Sheet: Designation of Iranian Entities and Individuals for Proliferation Activities and Support for Terrorism* (Oct. 25, 2007).

because Iran “is responsible for the deaths of at least 603 American service members in Iraq since 2003”—which “accounts for 17% of all deaths of U.S. personnel in Iraq from 2003 to 2011.”²⁴ In announcing the designation, the U.S. Secretary of State emphasized that the IRGC “plans, organizes, and executes terror campaigns all around the world,” and that the “IRGC institutionalized terrorism shortly after its inception, directing horrific attacks . . . alongside the terror group it midwived, Lebanese Hizballah.”²⁵

34. The IRGC always relied on the use of children. It did so based upon an edict by Ayatollah Khomeini—which remains in effect today—that those who fight for the Supreme Leader (*e.g.*, the IRGC and Hizballah) must use children to commit unspeakable violence. As Khomeini famously instructed: “Our leader is that 12-year-old boy: who, with his small heart,” and “with grenade in hand, threw himself under enemy tank and destroyed it and himself, and thus drank the nectar of martyrdom.” During the Iran-Iraq war, the IRGC used children as human mine sweepers, deliberately killing tens of thousands of young Iranian boys in the process.²⁶ From 2014 through 2024, the same IRGC leaders who made that decision, *e.g.*, Khamenei, also promoted the IRGC’s reliance on children to enable IRGC proxy attacks in the Middle East.²⁷ From at least 2000 through 2024, the IRGC relied on youth camps, in particular youth soccer camps, to recruit children. The United States has confirmed that the IRGC programmatically recruited children to enable its attacks, and helped its proxies do the same.²⁸ In 2010, for

²⁴ U.S. Dep’t of State, *Fact Sheet: Designation of the Islamic Revolutionary Guard Corps* (Apr. 8, 2019).

²⁵ Michael R. Pompeo, *quoted in* U.S. Dep’t of State, *Remarks to the Press* (Apr. 8, 2019).

²⁶ *See, e.g.*, Amb. Nikki Haley, *Remarks at a UN Security Council Open Debate on the Middle East*, U.S. Mission to the U.N. (Oct. 18, 2018).

²⁷ *See id.*

²⁸ *See, e.g., id.*; U.S. Dep’t of the Treas., *Treasury Sanctions Vast Financial Network Supporting Iranian Paramilitary Force That Recruits and Trains Child Soldiers* (Oct. 16, 2018).

example, Treasury found that IRGC-backed Hizballah youth camps “have been used to recruit future Hizballah members and operatives.”²⁹ In 2018, Treasury published photos of children, aided by IRGC trainers, shooting small arms at U.S. President targets (redactions by Plaintiffs):³⁰



35. The IRGC established Iran’s ballistic missile program. Ever since, the IRGC has had operational control over ballistic missile procurement, development, testing, and deployment, for which it integrated Hizballah into its missile-related operations, networks, and structures.³¹ That has been so because the “IRGC not only runs Iran’s missile development program, but also transfers short-range ballistic missiles to Iran’s regional allies and proxies,” including Hizballah.³² Indeed, the IRGC has jointly operated its missile program with Hizballah

²⁹ U.S. Dep’t of the Treas., *Fact Sheet: U.S. Treasury Department Targets Iran’s Support for Terrorism Treasury Announces New Sanctions Against Iran’s Islamic Revolutionary Guard Corps-Qods Force Leadership* (Aug. 3, 2010).

³⁰ U.S. Dep’t of the Treas., *Treasury Sanctions Vast Financial Network Supporting Iranian Paramilitary Force That Recruits and Trains Child Soldiers* (Oct. 16, 2018).

³¹ U.S. Dep’t of the Treas., *Fact Sheet: Designation of Iranian Entities and Individuals for Proliferation Activities and Support for Terrorism* (Oct. 25, 2007).

³² Statement of Kenneth Katzman Before Committee on Foreign Affairs Subcommittee on Middle East and North Africa Hearing on “Testing the Limits: Iran’s Ballistic Missile Program, Sanctions, and the Islamic Revolutionary Guard Corps” (Mar. 29, 2017).

and North Korea as a three-way joint venture. This meant that when North Korea powered Iran's ability to attack Americans with missiles, the DPRK necessarily also strengthened Hizballah's ability to attack Americans with missiles. As State reported in 2015: "Iran has admitted publicly that it armed Hizballah ... with advanced long-range Iranian manufactured 'Fateh' missiles. In late November, General Amir Ali Hajizadeh, the head of the IRGC Aerospace Division admitted that 'The IRGC and Hizballah are a single apparatus jointed together.'"³³ From at least 2014 through 2020, Hajizadeh was the top IRGC General responsible for its ballistic missiles, and he was directly involved in the January 8, 2020 Attack against Plaintiffs.

36. In Iran's and Hizballah's decades-long joint weapons enterprise with North Korea, *infra* ¶ 147, the IRGC and Hizballah are the vital interlocutor for collaborating with North Korean counterparties. Iranian entities support the IRGC's missile development and procurement efforts. One entity is the Shahid Hemmat Industries Group (SHIG), which is "responsible for Iran's liquid-fueled ballistic missile program."³⁴ SHIG is part of the procurement network for the IRGC/Hizballah missile joint venture. Also part of the IRGC/Hizballah missile joint venture is Shahid Bakeri Industrial Group (SBIG), which is "responsible for Iran's solid-fueled ballistic missile program,"³⁵ and the IRGC also runs SBIG.

37. The IRGC was never a part of the nation of Iran's regular armed forces. Properly understood given the totality of its conduct, doctrine, statements, and history, the IRGC was a transnational terrorist group acting as an agent of the Iranian state to pursue Iran's mission to export the Islamic Revolution through terrorist attacks targeting the United States, including by

³³ U.S. Dep't of State, *Country Reports on Terrorism 2014* at 1774 (June 2015) (emp.

³⁴ U.S. Dep't of Justice, U.S. Dep't of the Treas., U.S. Dep't of State, and U.S. Dep't of Commerce, *Iran Ballistic Missile Procurement Advisory* at 5 (Oct. 18, 2023).

³⁵ *Id.*

attacking U.S. allies like Israel. Indeed, the IRGC expressly disclaimed the notion that it was a part of the armed forces for the nation of Iran. The IRGC also regularly violated the laws of war when it committed its barbaric terrorist attacks.

3. Hizballah

38. In 1982, the IRGC founded Hizballah by deploying the resources of the IRGC and Foundation for the Oppressed to Lebanon. Ever since, Hizballah has served as the IRGC's most important terrorist partner. Hizballah's original name was selected by the same people who created the Foundation for the Oppressed on Earth; its Iranian creators called their newly created, and inextricably intertwined, Lebanese proxy the "Organization for the Oppressed on Earth."

39. In 1985, the Organization for the Oppressed on Earth rebranded itself as "Hizballah" (Arabic for "Party of God") and published what it entitled an "Open Letter Addressed by Hizballah to the Oppressed in Lebanon and the World," which is commonly referred to as Hizballah's Manifesto. In it, Hizballah announced, among other things:

- a. "We, the sons of Hizballah's nation, whose vanguard God has given victory in Iran and which has established the nucleus of the world's central Islamic state, abide by the orders of a single, wise, and just command represented by the guardianship of the jurisprudent (*vali-e faqih*), currently embodied in the supreme Ayatollah ... Khomeini. ..."
- b. "[O]ur military apparatus is not separate from our overall social fabric."
- c. "[The] first root of vice is America. ... Imam Khomeini, our leader, has repeatedly stressed that America is the cause of all our catastrophes and the source of all malice."

40. Hizballah members swore their loyalty to Ayatollah Khomeini until his death, after which they swore their loyalty to Ayatollah Khamenei. During the period when Hizballah attacked or enabled the attack against each Plaintiff, every Hizballah operative worldwide was commanded by, and swore their oath to, Ayatollah Khamenei.

41. Hizballah's geographic power base was in Lebanon, where it operated a parallel shadow government. However, Hizballah's activities stretched far beyond Lebanon's borders.

42. Hizballah ordinarily acted as the IRGC's interlocutor with its terrorist proxies, including Hamas and PIJ in Israel, JAM (including Kataib Hizballah) in Iraq, and al-Qaeda in Africa. Hizballah provided expert training, technical assistance, and in-country support, often through joint cells co-located with Hamas and PIJ (in Gaza, Lebanon, and Syria, among other places) and with JAM (in Baghdad and Basra, among other places).

43. Hizballah typically operated in joint cells in each geography in which it had a presence, through which it was co-located with a local proxy and their Qods Force sponsors, as it did in Iraq and Syria.³⁶ Treasury sanctions designations confirmed that Hizballah created and led JAM cells, including Kataib Hizballah, in Iraq.³⁷ Indeed, the IRGC has admitted the joint nature of its operations with Hizballah, including, but not limited to, their joint missile venture.³⁸

44. Hizballah provided direct assistance to, and was often involved in, attacks targeting the United States in Iraq and Syria that Hizballah jointly committed with JAM, including Kataib Hizballah. On June 9, 2010, for example, the Assistant Secretary of State testified: "In Iraq, we are also aware of Hizballah providing training and other support to Shia militant groups. As of early 2007, an Iran-based individual by the name of Abu Mahdi al-Muhandis"—who was killed alongside Qasem Soleimani on January 2, 2020—"formed a militia group, employing instructors from Hizballah to prepare this group and certain Jaysh al-Mahdi Special Groups for attacks against Coalition Forces in Iraq."³⁹ Muhandis played a vital role in the

³⁶ See, e.g., White House, *National Strategy for Counterterrorism of the United States of America* at 9 (Oct. 2018); Colonel Joel D. Rayburn (U.S. Army, ret.) and Colonel Frank K. Sobchak (U.S. Army, ret.), *The U.S. Army In The Iraq War, Volume 1, Invasion, Insurgency, Civil War, 2003-2006* at 187-88 (Jan. 2019).

³⁷ See, e.g., U.S. Dep't of the Treas., *Treasury Designates Hizballah Commander Responsible for American Deaths in Iraq* (Nov. 19, 2012).

³⁸ See, e.g., U.S. Dep't of State, *Country Reports on Terrorism 2014* at 173-74 (June 2015).

³⁹ Jeffrey D. Feltman, *Hezbollah Assessment: Testimony, Senate Foreign Relations, June 8, 2010*, Congressional Testimony via FDCH (June 9, 2010), 2010 WLNR 11745058 (cleaned up).

commission and planning of every attack against Plaintiffs in Iraq and Syria because he directly participated in and/or built the cells that committed each one.

45. Like the IRGC, Hizballah relied on children. From at least 2000 through 2024, Hizballah recruited young boys and girls through Iran-funded youth sports camps, including youth soccer camps, that the terrorists used as a gateway for radicalization to recruit child fighters. Indeed, Hizballah has admitted as much. In 2014, for example, Hizballah media arm *al-Manar* posted on Facebook about how IRGC-funded, Hizballah-operated soccer camps played an important role in helping the terrorists recruit children, which included the following images of two children in soccer camp jerseys who traveled from an Iran-funded youth camp to visit a Hizballah site and pose with Hizballah weapons, including a rocket launcher:



46. Hizballah often paraded its child recruits in military formation over a U.S. flag:



47. Like the IRGC, Hizballah engaged in child sex trafficking ventures to both finance their attacks and reward their fighters with children whom they could rape. In 2017, for example, a former U.S. counterterrorism official testified that Hizballah used transnational child sex trafficking rings to enable its operations.⁴⁰

48. At all relevant times, Hizballah was led by Secretary General Hassan Nasrallah, who played a direct role in its attacks (*i.e.*, “operations”), including, but not limited to, attack-related planning, recruitment, and coordination with Ayatollah Khamenei, Qasem Soleimani, and their allies in the Khamenei Cell.⁴¹ In 2016, Nasrallah admitted: “We are open about the fact that Hezbollah’s budget, its income, its expenses, everything it eats and drinks, its weapons and rockets, come from the Islamic Republic of Iran.”⁴² He was killed on September 27, 2024.

4. Supreme Leader’s Office

49. Since 1989, Ayatollah Khamenei’s official title has been “Supreme Leader of the Islamic Revolution,” which reflected his—and the SLO’s—transnational scope. Consistent with this approach, the SLO served as a multi-faceted operations, finance, and logistics front for Hizballah, the IRGC, and Khamenei’s allies.

50. Ayatollah Khamenei overhauled the SLO to optimize the Iranian regime’s financial and logistical support for Hizballah-sponsored terrorist attacks, including in Israel. Consistent with this overhaul, Khamenei also dramatically tightened his personal grip on the Foundation for the Oppressed, Hizballah, the IRGC, and the SLO—*i.e.*, the Terrorist Sponsors.

⁴⁰ See Rep. Ann Wagner and Dr. David Asher, *in* Fed. News Serv. Transcripts, *H Foreign Aff Hearing on Attacking Hezbollah's Financial Network* (June 8, 2017), 2017 WLNR 18085372.

⁴¹ See, *e.g.*, U.N. Sec. Council, *Final Report Of The Panel Of Experts Established Pursuant To Resolution 1929 (2010)* ¶ 67 & n.81 (June 1, 2015).

⁴² Hassan Nasrallah, *in* Robin Wright, *The New Yorker*, *Having Tea with Hezbollah’s No. 2* (Dec. 13, 2016); see also, *e.g.*, U.N. Sec. Council, *Second Report of the Secretary-General on the Implementation of Security Council Resolution 2231 (2015)* ¶ 8 (Dec. 30, 2016).

51. To ensure control, Khamenei deployed SLO operatives (who were simultaneously members of the IRGC) to serve as his representatives to Hizballah, the Foundation for the Oppressed, and the IRGC, among others. Under Khamenei's control—exercised through his IRGC terrorist son, Mojtaba Khamenei, the Ayatollah ordinarily operated the SLO to maximize the amount of money spent on terrorism. Ayatollah Khamenei, Mojtaba Khamenei, and their SLO agents embedded Khamenei's loyalists into every Iranian-regime-related organization of consequence (government and business alike) to serve as eyes and ears for the Khameneis and SLO they jointly operated—including all components of the Foundation for the Oppressed, IRGC, and Hizballah—through the Supreme Leader's "representatives."

52. The SLO provided a financial slush fund for terrorist activities. Ayatollah Khamenei, Hizballah, the IRGC, and the Foundation for the Oppressed programmatically redeployed SLO resources, personnel, and profits to assist terrorist attacks by Iranian proxies. The SLO played a direct operational role in Hizballah- and IRGC-sponsored proxy attacks.

53. U.S. sanctions designations confirmed the SLO enabled attacks. In 2019, for example, the President issued Executive Order 13876 to protect the United States from "the actions of the Government of Iran and Iranian-backed proxies, particularly those taken to destabilize the Middle East" and "promote international terrorism."⁴³ Executive Order 13876 blocked the SLO, in recognition of the Supreme Leader's and SLO's role in exporting "violence, sabotage, and terrorism."⁴⁴ Also in 2019, Treasury designated additional members of the SLO

⁴³ Exec. Order No. 13,876, *Imposing Sanctions with Respect to Iran*, 84 Fed. Reg. 30,573 (June 24, 2019).

⁴⁴ Steven Mnuchin, in U.S. Dep't of the Treas., *Treasury Targets Senior IRGC Commanders Behind Iran's Destructive and Destabilizing Activities* (June 24, 2019).

under Executive Order 13876.⁴⁵ In doing so, Treasury explained that Khamenei and his “appointees in the Office of the Supreme Leader” were “responsible for advancing Iran’s radical agenda” through “a shadow network” of “military and foreign affairs advisors who have for decades . . . exported terrorism . . . around the world.”⁴⁶ These “unelected officials who surround Iran’s Supreme Leader . . . are linked to a wide range of malign behaviors by the regime, including bombings of the U.S. Marine Barracks in Beirut in 1983” and “extrajudicial killings,” according to the U.S. Treasury Secretary.⁴⁷ In 2021 and 2024, moreover, the U.S. publicly designated “Ali Hussein Khamenei, Supreme Leader, for support of the IRGC, a Foreign Terrorist Organization,” and “Mojtaba Khamenei, son of Supreme Leader,” as persons whom the United States had sanctioned for “support for international terrorism.”⁴⁸

B. The Terrorist Sponsors Led the “Axis of Resistance” Global Terrorist Alliance That Used Proxies to Commit Anti-American Terrorist Attacks.

54. Since 1979, the Terrorist Sponsors have led an alliance of anti-American terrorist organizations, united by their shared mission of conducting terrorist attacks targeting the United States—directly, by targeting Americans, or indirectly, by targeting United States allies—to coerce U.S. government decisionmakers in, *inter alia*, DoD at the Pentagon, which is located in the Eastern District of Virginia, to choose to withdraw from the Middle East. Since 2003, this alliance has proudly called itself the “Axis of Resistance,” and the terrorist groups that composed the Axis of Resistance acted as Iran’s proxies for committing and facilitating terrorist attacks.

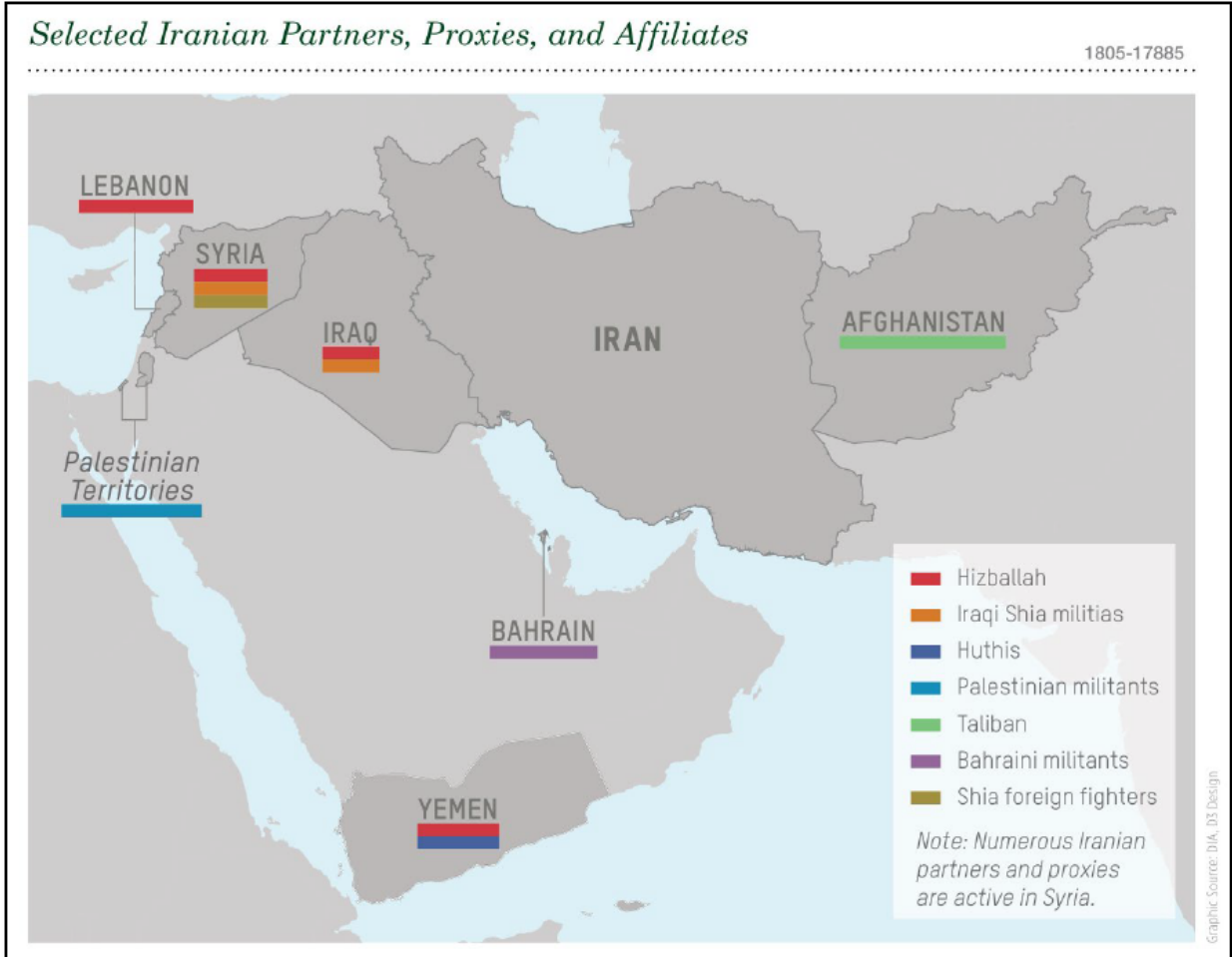
⁴⁵ U.S. Dep’t of the Treas., *Treasury Designates Supreme Leader of Iran’s Inner Circle Responsible for Advancing Regime’s Domestic and Foreign Oppression* (Nov. 4, 2019).

⁴⁶ *Id.*

⁴⁷ *Id.*

⁴⁸ U.S. Dep’t of State, *Report to Congress on Identification of, and Immigration Restrictions on, Senior Officials of the Government of Iran and their Family Members* (Jan. 2021); U.S. Dep’t of State, *Report to Congress on Identification of, and Immigration Restrictions on, Senior Officials of the Government of Iran and their Family Members* (Jan. 2024).

55. Iran's proxies in the Axis of Resistance included, among others: (1) Hizballah; (2) Hamas and PIJ; (3) JAM, including Kataib Hizballah; (4) al-Qaeda, including al-Shabaab; and (5) the North Korean security services, including the RGB, among others. Each of these groups and its members was always an official, employee, or agent of Iran and North Korea for purposes of committing terrorist attacks, and facilitating terrorist attacks was within the scope of their office, employment, or agency. Iran's funds, arms, and other aid powered Iran's proxy attacks from 2019 through 2023. In 2019, for example, the U.S. Defense Intelligence Agency ("DIA") reported that Iran supplied such aid to Hizballah, JAM, and Hamas, among others:⁴⁹



⁴⁹ Def. Intel. Agency, *Iran Military Power: Ensuring Regime Survival and Securing Regional Dominance* at 58, 90 (Nov. 2019) ("Iran Military Power").



56. **JAM** was founded by Hizballah, publicly identified as Hizballah’s “striking arm in Iraq,” operated in Baghdad through a joint Hizballah-JAM cell, and was led by Muqtada al-Sadr and Abu Mahdi al-Muhandis (leader of Kataib Hizballah). JAM included notorious JAM Special Groups, the most infamous of which were KH and Asa’ib Ahl al-Haq. Throughout JAM’s existence, the Terrorist Sponsors worked closely with Hizballah—which served as their face, agent, and primary interlocutor with JAM—to intensify attacks targeting the United States in Iraq. Hizballah recruited, trained, armed, and directed JAM terrorists, who carried out attacks against Americans on Hizballah’s behalf as Hizballah’s and Iran’s agent in Iraq.

57. **Hamas** and **PIJ** established themselves in the 1970s and 1980s as violent, global, Sunni Islamist groups dedicated to destroying Israel and killing all Jewish persons there. In 1990, the Terrorist Sponsors cemented deep bonds and proxy ties with Hamas and PIJ and provided most of their funds, as well as supplying arms, training operatives, and coordinating attacks. On October 7, 2023, Hamas and PIJ jointly committed a barbaric complex attack across Israel, in which terrorists killed more than 1,000 victims while simultaneously kidnapping more than 200 victims to take as hostages (the “October 7 Attack”).

58. **Al-Qaeda** was founded by Osama bin Laden in the late 1980s in Afghanistan and for decades has been a Sunni Islamic terrorist organization intent on destroying the United States. Iran has supported, supplied, and trained al-Qaeda terrorists since the 1990s and since September 11, 2001, al-Qaeda has worked closely with Iran, through the Terrorist Sponsors, to launch attacks against the United States in Afghanistan, Pakistan, Iraq, and Kenya, among other places. The Harakat Shabaab al-Mujahidin—commonly known as **al-Shabaab**—is al-Qaeda’s affiliate in East Africa. Al-Shabaab declared its allegiance to al-Qaeda in 2012.

59. The **RGB** has been North Korea’s primary terrorist arm since the 1990s, working closely with the Terrorist Sponsors to facilitate Iran-sponsored extrajudicial killings and hostage takings, among other violence. The RGB and its members operated as Iran’s agents for purposes of facilitating terrorist attacks, as well as officers, employees, or agents of North Korea, which was a designated State Sponsor of Terrorism from 1988 through 2008, and was redesignated in late 2017 after nearly a decade of North Korean support for its Axis of Resistance partners. Facilitating terrorism targeting the United States on behalf of Iran and North Korea was within the scope of RGB’s and its members’ office, employment, or agency.

C. The Terrorist Sponsors Used Joint Cells to Coordinate their Proxies’ Terrorist Attacks.

60. Since the 1980s, the Terrorist Sponsors and their proxies have relied heavily on a “joint cell” model of violence, under which two or more terrorist groups combine one or more of their cells in a certain area, or for a certain competency, to optimize the lethality of their shared attacks. This joint-cell approach has enabled Iran’s Terrorist Sponsors and Iran to maintain close control over their agents as they coordinated and executed terrorist attacks.

61. The most significant joint cell was the “**Khamenei Cell**,” which has existed since 2000 and was created and led by Ayatollah Khamenei to coordinate the deployment of

operatives, weapons, logistics, pre-attack intelligence, and associated finances and fronts while seeking to obscure Iran's involvement in particular attacks. The Khamenei Cell was the operational outgrowth of Khamenei's decades-long operations-focused inner circle and included dozens of terrorist leaders who served Khamenei through their roles in the Foundation for the Oppressed, Hizballah, the IRGC, and SLO.

62. The Khamenei Cell included Hizballah and IRGC operatives based in Iran, Iraq, and Lebanon, and was remarkably stable, with every member being a terrorist leader who had sworn allegiance to the Supreme Leader, was a long-standing ally of Khamenei and part of his "inner circle" or a key lieutenant of such person, and who had directly sponsored attacks targeting the United States in the past. Some Khamenei Cell members were dual-hatted terrorists, meaning they were members of two allied groups.

63. Hizballah played a lead role in committing, planning, and authorizing specific attacks sponsored by the Khamenei Cell. The Khamenei Cell thus functioned, in effect, as the Hizballah-led terrorist attack network that operationalized Ayatollah Khamenei's and the Supreme Leader's Office's directives to execute on the most complex attacks, which almost always meant high-profile rocket, missile, UAV, bomb, and hostage-taking attacks targeting the United States. Khamenei and the SLO directed Hizballah-led attacks for decades through the personal involvement of Khamenei, the SLO, and senior members of Khamenei's inner circle.

64. Hizballah operatives who served in the Khamenei Cell included, but were not limited to, Hassan Nasrallah, Muhammad Kawtharani, Khalil Harb, Yusuf Hashim, Mohammad 'Abd-al-Hadi Farhat, and Muhammad Yusuf Ahmad Mansur. Khamenei Cell members who led the Foundation for the Oppressed included, but were not limited to, Mohsen Rafiqdoost and Parviz Fattah. IRGC members of the Khamenei Cell included, but were not limited to, Qasem

Soleimani, Esmail Qaani, Rostam Qasemi, and Mohammad Ali Jafari. SLO members of the Khamenei Cell included, but were not limited to, Mojtaba Khamenei, Mohsen Rezai, and Gholam-Ali Hadad-Adel. JAM leaders who were in the Khamenei Cell included, but were not limited to, Muqtada al-Sadr and Abu Mahdi al-Muhandis. Hamas operatives who served in the Khamenei Cell included, but were not limited to, Ismail Haniyeh and Yahya al-Sinwar.

65. U.N. Security Council reports confirmed how Khamenei Cell members from groups like the Qods Force, Hizballah, and Kataib Hizballah acted jointly to manage terrorist operations. In 2016, for example, the Council’s Panel of Experts reported that “an Iranian news agency reproduced photographs showing the Commander of the Quds Force . . . Qasem Soleimani” in a joint cell’s “‘Fallujah operations room’ in Iraq” in which Soleimani plotted “in the same photograph” alongside Kataib Hizballah operative “Abu Mahdi al-Muhandis”⁵⁰:



66. In addition to the Khamenei Cell, other joint cells coordinated logistics and operations. The IRGC, Hizballah, Hamas, PIJ, JAM, and North Korea’s RGB maintained a **Joint Logistics Cell** that coordinated the development, distribution, testing, and training of the

⁵⁰ U.N. Sec. Council, *Report of The Secretary-General on the Implementation Of Security Council Resolution 2231 (2015)* ¶ 37 (July 12, 2016).

common terrorist weapons, tactics, and objectives that united the Axis of Resistance, including, but not limited to: (1) rocket and missile research, development, and deployment; (2) specialized training by the RGB to the other Axis members concerning kidnapping, rocket attacks, and tunnel attacks—three of the RGB’s signature attack types; (3) shared ratlines, safehouses, and sites for meetings and operational planning; and (4) collaboration to promote weapons-related interoperability between all the members of the Axis. Each of these features benefited all members of the Joint Logistics Cell, which operated in, *inter alia*, Iran, North Korea, and Syria.

67. Hizballah and Hamas often collaborated on attacks through **Joint Operations Cells** with sites located in Lebanon, Syria, and the Palestinian territories. The Joint Hizballah/Hamas and Hizballah/PIJ Operations Cells helped the Terrorist Sponsors reliably smuggle their Iranian-made or procured weapons from Egypt (the last stop before Gaza) overland (or via underground tunnel) across the border separating Egypt from Gaza.

D. Iran’s Terrorist Sponsors Aided Anti-American Attacks to Further Their Counterpressure Conspiracy that Targeted the Eastern District of Virginia.

68. The Terrorist Sponsors supported their Axis of Resistance proxies to further the Iran-led counterpressure, which targeted the Eastern District of Virginia. In connection with every Plaintiff who was attacked from 2019 through 2023, Iran, North Korea, and their FTO proxy allies conspired to counter the pressure of U.S. sanctions that targeted all of them with “counterpressure” as described below. On May 8, 2018 – as the DIA explained in a public report to Congress on November 19, 2019 – “the United States withdrew from the JCPOA [Joint Comprehensive Plan of Action] and began reimposing unilateral sanctions on Iran.”⁵¹ “In April 2019,” according to the DIA, “the U.S. State Department formally designated the IRGC as a

⁵¹ Def. Intel. Agency, *Iran Military Power*, at 9; see White House, *President Donald J. Trump is Ending United States Participation in an Unacceptable Iran Deal* (May 8, 2018).

foreign terrorist organization (FTO) and announced it would not renew exemptions for select countries to import Iranian oil” and, “[i]n response to these actions,” “Iran began its own counter-pressure campaign, which [] included ... conducting ... unconventional warfare attacks against U.S. allies and interests”⁵² – *i.e.*, terrorist attacks targeting the United States worldwide.

69. Thus, Iran’s response to U.S. sanctions pressure was to engage in a terrorism “counterpressure” campaign against U.S. officials, with the goal of coercing the United States to withdraw from the Middle East (with DoD at the Pentagon in the Eastern District of Virginia being essential to any such decision and its execution) and deterring, degrading, and destroying U.S.-origin sanctions targeting Iran (with Treasury’s Financial Crimes Enforcement Network (FinCEN), which is located in this District, being essential to the operation of such sanctions), among other objectives. For example, On July 25, 2017, the Iranian regime broadcast an interview with IRGC Commander-in-Chief Mohammad Ali Jafari that directly threatened IRGC-sponsored rocket and missile attacks targeting U.S. servicemembers in the Middle East as a potential Iranian reply to the intensified U.S. economic sanctions that were already underway—and expected to increase—by that point, in which Jafari stated (as published by IRIB): “If the US wants to pursue imposing sanctions on the IRGC and defense issues, it should first close its regional military bases in a radius of 1,000 km away from Iran, and know that it should correct its miscalculation at a high price.”⁵³ And in 2020, “U.S. military, intelligence and law enforcement officials were briefed ... on a threat against the Pentagon’s most senior leaders while they are on American soil, not just traveling overseas.”⁵⁴

⁵² Def. Intel. Agency, *Iran Military Power*, at 9.

⁵³ Islamic Republic of Iran Broadcasting, *Top Commander: US Needs To Leaves Bases In Region If Sanctions IRGC*, Iranian Gov’t News (July 25, 2017).

⁵⁴ Courtney Kube and Carol E. Lee, *Top U.S. Officials were Briefed on an Active Threat Against Pentagon Leaders, Say Five Officials*, NBC News (Oct. 29, 2020).

70. Each attack against Plaintiffs was part of Iran’s counterpressure conspiracy and served to advance Iran’s and North Korea’s shared interests in, *inter alia*, ejecting America from the Middle East (which would benefit both Defendants) and deterring, degrading, and destroying U.S.-origin economic sanctions that targeted Iran and the DPRK, including, but not limited to, missile sanctions adopted by the U.S. and U.N. that simultaneously targeted both Defendants. Iran’s targeting of persons in the Eastern District of Virginia was key to realizing both goals.

II. Iran’s Terrorist Sponsors Converted Commercial Profits into Terrorist Attacks.

71. The essential fuel for Iran’s terrorism machine has been money from Iran’s most lucrative economic sectors. Over several years, Iran has granted monopolies to the Terrorist Sponsors that enabled them to convert commercial profits into terrorist attacks.

A. Iran Has Enabled the Terrorist Sponsors to Monopolize Key Sectors of the Iranian Economy.

72. Iran enabled the Foundation for the Oppressed, IRGC, and SLO to orchestrate a monopolistic takeover of key components of Iran’s economy between 2005 and 2009. By the time the takeover was complete, those Terrorist Sponsors notoriously controlled well over half of the entire Iranian economy. The United States reported similar conclusions.⁵⁵

73. In late 2007, the Terrorist Sponsors had monopolized Iran’s construction sector. Having established this monopoly, the SLO and the IRGC aggressively expanded their reach from 2007 through 2011 by vertically integrating the Terrorist Sponsors throughout every significant construction firm and project in Iran or subject to Iranian investment outside of Iran. The United States formally confirmed this monopoly when the President signed Executive Order 13902 in 2020, imposing sector-wide sanctions targeting Iran’s construction sector based on a

⁵⁵ See, e.g., U.S. Dep’t of the Treas., *Treasury Targets Billion Dollar Foundations Controlled by Iran’s Supreme Leader* (Jan. 13, 2021) (“more than half of the Iranian economy”).

finding that all revenue generated by the “construction...sector[] of the Iranian economy” funded Iranian-regime sponsored attacks by IRGC proxies in the Middle East.⁵⁶

74. By late 2007, the Terrorist Sponsors had monopolized Iran’s sanctions evasion sector, which comprised three sub-sectors: (1) the black market; (2) smuggling and port operations; and (3) shipping and logistics. The SLO and IRGC operationalized this monopoly through the Terrorist Sponsors.

75. By late 2007, the Terrorist Sponsors had monopolized Iran’s financial sector—which comprised Iranian banks, currency exchanges, and *hawalas*. That monopoly was operationalized through the Foundation for the Oppressed, IRGC, and SLO, which owned and/or exercised direct or indirect control over all banks, currency exchanges, and *hawalas* in Iran.

76. By 2009, the SLO, Foundation for the Oppressed, and IRGC had monopolized Iran’s communications sector. That sector was comprised of Iranian telecommunications, internet, social media, computing, and communications technology firms. The SLO, Foundation, and IRGC collectively owned and/or exercised direct or indirect control over all communications companies in Iran. These entities controlled, among others, MTN Irancell (“Irancell”), Iran Electronics Industries (“IEI”), and Telecommunications Company of Iran (“TCI”).

B. Iran’s Terrorist Sponsors Have Generated Profits, Intelligence, and Recruits from Illicit Commercial, Cyber, and Online Activity in America, Including in the Eastern District of Virginia.

77. The activity of Iran’s Terrorist Sponsors extended beyond Iran’s own borders and reached into the United States, including the Eastern District of Virginia.

78. **Cigarette Smuggling.** Acting as Iran’s agent, Hizballah operatives have exploited the significant tax differentials between Virginia—which had the second-lowest cigarette tax in

⁵⁶ Exec. Order No. 13902, *Imposing Sanctions With Respect to Additional Sectors of Iran*, 85 Fed. Reg. 2003 (Jan. 10, 2020).

the nation in 2013—and high-tax states in the Northeast, establishing sophisticated trafficking networks that purchased large quantities of cigarettes in Virginia for illegal transport and sale in New Jersey and other high-tax states.⁵⁷ As documented by law enforcement agencies, these trafficking operations generated millions of dollars in profits that were then funneled to Hizballah to support its terrorist activities.⁵⁸ In May 2013, state law enforcement authorities dismantled a cigarette smuggling ring “associated with both Hamas and Hezbollah operatives” that had smuggled more than 20,000 cartons of cigarettes per week from Virginia to one or more states to the north, generating an estimated \$65 million in profits.⁵⁹ These smuggling operations represented a critical funding source for Hizballah’s terrorist attacks in the Middle East.⁶⁰ As the former U.S. Attorney for the Eastern District of Virginia emphasized in 2004, the involvement of “Hezbollah” in the illicit tobacco trade emphasized the importance of “pursuing cases such as cigarette smuggling because of the possibility that proceeds from that crime could end up in the hands of terrorists.”⁶¹ Such smuggling operations involved substantial activity in the Eastern

⁵⁷ Va. State Crime Comm’n, *Illegal Cigarette Trafficking in Virginia* at 7 (Nov. 14, 2013).

⁵⁸ See, e.g., U.S. Dep’t of State, U.S. Dep’t of Justice, U.S. Dep’t of the Treas., et al., *The Global Illicit Trade in Tobacco: A Threat to National Security* at 2, 7 (Dec. 2015) (cigarette smuggling is “a lucrative crime for some terrorist groups and a potential revenue source to finance acts of terror” and “encourages a convergence between organized crime, terrorist groups, and other threat networks,” as confirmed by law enforcement operations that “have shown specific links between cigarette smuggling and terrorist organizations, such as ... Hizballah”; high-profile Islamist terrorist “Mokhtar Belmokhtar ... is known as ‘Mr. Marlboro’ because of his involvement in cigarette smuggling as a means to raise funds for his terrorist organization”).

⁵⁹ Va. State Crime Comm’n, *Illegal Cigarette Trafficking in Virginia*, *supra*, at 21.

⁶⁰ See, e.g., U.S. Gen. Accountability Office, *Cigarette Smuggling: Federal Law Enforcement Efforts and Seizures Increasing*, GAO-04-641 (May 2004); U.S. House Comm. on Homeland Sec. Minority Staff, *Tobacco and Terror: How Cigarette Smuggling is Funding our Enemies Abroad*, at 1-4 (Apr. 29, 2008); U.S. Dep’t of State, et al., *The Global Illicit Trade in Tobacco: A Threat to National Security*, at 2, 7, 12-13 (Dec. 2015); *A Hazy Crisis: Illicit Cigarette Smuggling in the OSCE Region*, Hearing Before the Commission on Sec. and Cooperation in Europe (July 19, 2017) (Statement of Sen. Roger Wicker).

⁶¹ NBC News, *Cigarette Smuggling Linked to Terrorism* (June 8, 2004) (quoting McNulty).

District of Virginia, as the smuggled goods were regularly purchased in this District and/or transported through this District via Interstate 95.

79. **Narcotics and Money Laundering.** Another Hizballah activity in the United States has been drug smuggling and money laundering. In 2011, a federal grand jury in the Eastern District of Virginia indicted Ayman Joumaa, who remains a publicly charged fugitive (E.D. Va. Case No. 1:11-cr-00560), for allegedly leading an international drug trafficking and money laundering network that involved coordinating multi-ton shipments of cocaine from Colombia to the Los Zetas Mexican drug cartel destined for America, and laundering hundreds of millions of dollars in these drug proceeds back to the Colombian suppliers. In 2012, Treasury announced its designation of four individuals and three entities involved in laundering the proceeds of narcotics trafficking for Joumaa. In announcing the designations, Treasury described Joumaa’s network as “a sophisticated multi-national money laundering ring, which launders the proceeds of drug trafficking for the benefit of criminals and the terrorist group Hizballah.”⁶²

80. **Cyber Crimes.** To power its weapons development, intelligence, and propaganda activities (which also powered the first two), the Terrorist Sponsors engaged in a multi-year campaign of cyber hacking and related intelligence-gathering activities on Americans in the United States, including in the Eastern District of Virginia. IRGC hackers persistently targeted defense firms and command structures in DoD,⁶³ of which the Pentagon, located in the Eastern

⁶² U.S. Dep’t of the Treas., *Treasury Targets Major Money Laundering Network Linked to Drug Trafficker Ayman Joumaa and a Key Hizballah Supporter in South America* (June 27, 2012).

⁶³ See, e.g., Iran Int’l, *Iran-Linked Hackers Target World Defense Firms With New Malware* (Dec. 22, 2023), 2023 WLNR 43281641 (the “Microsoft Threat Intelligence Unit, the firm’s global network of security experts,” reported that an Iran-backed hacking campaign deploying “APT33 ..., has recently focused on organizations in the US Defense Industrial Base (DIB), which includes hundreds of thousands of American and foreign entities and subcontractors that

District of Virginia, was among the largest targets.⁶⁴ Indeed, the IRGC bragged about such conduct. In 2017, for example, IRGC-controlled media organ IRIB published an interview with the IRGC’s top ballistic missile operative. IRGC Aerospace General Amir Ali Hajizadeh—who was involved in the January 8, 2020 Attack against Plaintiffs—effectively admitted it.⁶⁵

81. **Online Fundraising and Recruiting.** The Terrorist Sponsors extended their activities to the Eastern District of Virginia for their online fundraising, recruiting, and attack targeting efforts, which relied on propaganda that flowed through this District. The Terrorist Sponsors, including the IRGC and Hizballah, regularly posted on U.S.-based social media platforms, such as Instagram and Twitter (now known as “X”), to reach users in America, including in the Eastern District of Virginia. These propaganda efforts targeted government officials working at DoD and members of the Iranian and Lebanese diaspora, located in the Eastern District of Virginia, as part of Iran’s counterpressure campaign to drive America out of the Middle East. These efforts also supported the Terrorist Sponsors’ fundraising, recruitment, and intelligence activities in the United States and abroad. In 2018, for example, Qasem

perform work for the [DoD] and other Federal departments and agencies” because Iran’s agents were “actively pursuing intelligence gathering for the Iranian government” while “the Islamic Revolution Guard Corps (IRGC) is known for its large ‘cyber army’ that engages” in “disinformation activities abroad” and “sophisticated hacking of Western [] targets”).

⁶⁴ See, e.g., Indictment [Dkt. 1], *United States v. Arabi, et al.*, No. 1:20-cr-00217 (E.D. Va. Sept. 15, 2020) (charging three Iranian computer hackers who infiltrated, *inter alia*, E.D. Va. servers with identity theft and hacking on behalf of the IRGC to steal critical information related to United States aerospace and satellite technology and resources); Indictment [Dkt. 1], *United States v. Masoud Jalili, et al.*, No. 1:24-cr-00439 (D.D.C. Sept. 26, 2024) (indicting four IRGC hackers for, *inter alia*, targeting DoD leadership at the Pentagon).

⁶⁵ See Islamic Republic of Iran Broadcasting, *Commander Says Iran Has Father-Of-All-Bombs, US Military Command Center Penetrated by IRGC*, Iranian Gov’t News (Sept. 25, 2017) (“Amir Ali Hajizadeh” said “that over the recent years, the IRGC has penetrated into the US military command centers and has evidence of their support for [] ISIL” and “reiterated that” the “IRGC” could “release those documents” to “bring about more ‘scandals’ for the US”).

Soleimani used Instagram to rally opposition to anticipated new U.S. sanctions, posting a message on Instagram alongside “I Will Stand Against You” in *Game of Thrones*-font:



82. Within an hour of Qasem Soleimani's death in a U.S. strike on January 2, 2020, IRGC-owned Twitter and Instagram accounts began a coordinated propaganda campaign (hashtag **"#HardRevenge"**) directly threatening to inflict violence targeting America. The next day, Ayatollah Khamenei posted on Instagram in which he promised that the IRGC would commit terrorist attacks targeting the United States in retaliation for the strike against Soleimani.

83. In the days that followed, the IRGC and Hizballah launched a comprehensive social media campaign on Twitter, Instagram, and other U.S. social media networks. Beginning on January 3, 2020—and continuing for months thereafter—IRGC operatives used IRGC-controlled accounts on Twitter and Instagram to post messages threatening the United States and seeking to instill fear and terror in U.S. servicemembers and senior U.S. military officials, and their families, many of whom reside in the Eastern District of Virginia. For example, a network

of IRGC operatives sponsored the IRGC's "#HardRevenge" campaign on Twitter, included the below image showing U.S. military leaders in crosshairs, alongside "COMING SOON":



One or more of the U.S. servicemembers targeted in the message above was based in the Eastern District of Virginia, and occupied the most senior uniformed position at the Pentagon.

84. Similarly, on Instagram, IRGC operatives posted graphic images of a beheaded President Trump and messages directing the United States to “Prepare the coffins,” along with an image of a child walking amongst U.S. flag-covered caskets. As one example:



85. Hizballah also engaged in online fundraising and recruitment activity in the United States, including in the Eastern District of Virginia. In 2023, for example, the U.S. Attorney’s Office for the Eastern District of Virginia announced this Court’s authorization for the United States to seize 13 domain names used by Hizballah and its affiliates that were registered with VeriSign and the Public Interest Registry in Reston, Virginia. Hizballah and its affiliates used these domain names to communicate with operatives, transmit propaganda, and solicit funds for attacks.⁶⁶ The investigation further showed that Hizballah used domains such as “moqawama.org” to facilitate fundraising for arms and ammunition.

⁶⁶ U.S. Att’y’s Off., E.D. Va., *EDVA Seizes 13 Domains Used by Lebanese Hezbollah and its Affiliates* (May 11, 2023).

C. The Terrorist Sponsors' Commercial Profits Have Enabled Iran to Provide Vital Support to Terrorist Attacks.

86. Iran's Terrorist Sponsors have used most of their commercial profits to fund terrorist attacks targeting the United States in the Middle East. Throughout the relevant period, the Terrorist Sponsors have used several mechanisms to ensure that more than half of the Terrorist Sponsors' profits flowed systematically and ineluctably to fund proxy attacks.⁶⁷

87. **Logistics Policy Directive.** One such channel was the Iranian government's Logistics Policy Directive, an official Iranian government policy dictating that the IRGC must dedicate the profits earned from its commercial activities to terrorist attacks. Published on June 8, 2003 in Iran's Official Gazette, the Directive provided that regarding the profits derived from whenever "any unit" of "the Islamic Revolutionary Guard Corps ... and related organizations ... sign[ed] contract agreements for civil projects," "[t]he monies received from any [such IRGC-related] contract...shall be deposited to the Chancery, and its equivalent shall be placed at authority of the [IRGC] from the credit determined in the annual budget, so that it would be used for the costs related to the [IRGC-related] contract, also the strengthening of the [IRGC], and replacing [IRGC] equipment and machinery parts" needed for its operations, *i.e.*, terrorism. Office of the President of the Islamic Republic of Iran, Logistics Policy Directive, Official Gazette 1382, Vol. 1, at 589-590 (June 8, 2003). Moreover, under the Directive, the IRGC "can, proportionally to [the IRGC's] needs, exchange or sell excess material, and equipment and machinery" to finance IRGC operations. *Id.*

⁶⁷ See, e.g., Radio Farda, *Revealing The Secret Meeting Of Major General Jafari About Corruption And Mafia Relations At The Highest Levels Of The IRGC* (Feb. 15, 2022); Adewale Adeyemo (U.S. Deputy Sec'y of the Treasury), in U.S. Senate Comm. on Banking, Housing, and Urban Affairs, *Full Committee Hearing: An Update from the Treasury Department: Countering Illicit Finance, Terrorism and Sanctions Evasion* (Apr. 9, 2024); U.S. Senate Comm. on Banking, Housing, and Urban Affairs, Minority Staff, *Scott Calls on Treasury to Block Iran's Access to Funds, Demands Accounting of High-Value Iranian Assets* (Apr. 12, 2024).

88. At bottom, the Logistics Policy Directive established an ironclad rule: the IRGC was authorized and encouraged to act as contractors in development schemes and engage in commercial activity through its fronts, subject to the requirement that any profit would be used to help the IRGC fund the IRGC's central anti-American terrorist mission. The Directive, in effect, mandated that IRGC profits derived from IRGC fronts be used primarily to enable IRGC-sponsored terrorism by providing off-the-books funding sources for key IRGC weapons programs and other forms of support for terrorist attacks. Since 2003, the Directive has always been in force, has always applied to profits generated for the IRGC's front companies, and has always required that such profits be dedicated to sponsoring acts of terrorism. The Directive has meant that the IRGC earmarked the profits its fronts generated to directly fund terrorist attacks.

89. **Mandatory Donations (*Khums*).** From 1979 through the present, the Terrorist Sponsors have relied upon mandatory donations, or *khums*, comprising 20% of all income, which has flowed up to Khamenei and then back down to the Khamenei Cell and, through the Khamenei Cell, to Iran's proxies to finance terrorist attacks. Shiite theological traditions call for donations (*khums*), usually equal to 20% of a person's income on every transaction, to support the cause. Pursuant to governing IRGC and Hizballah doctrine, the IRGC emphasizes the need to consistently collect donations (or taxes) as something that is universally required from all profit-generating activities and transactions—without exception—including, but not limited to, profits generated through official business, criminal rackets, bribery and kickbacks, and a broad array of other illicit cash flow schemes. The IRGC's "no exceptions" rule ensures that the terrorists have an administratively simple scheme analogous to a terrorist flat tax.

90. **Terrorist Sponsor Fronts.** Beyond those mandatory mechanisms, the Terrorist Sponsors have used additional profits generated by commercial fronts, directly or indirectly

operated for their benefit, to fund attacks. The Foundation for the Oppressed, for example, has directly financed terrorist attacks by Iran's proxies because that has always been the Foundation's primary reason for its existence. The same was true of the SLO and IRGC. The Terrorist Sponsors have exercised programmatic control over their respective profits generated by their stake in fronts, which the Terrorist Sponsors have used to maximize their ability to convert such value into attacks targeting America. As *Radio Free Europe* reported in 2009, "all the IRGC's economic activities are monitored only by internal IRGC auditors."⁶⁸ A legion of in-house Hizballah, IRGC, and SLO auditors and accountants have ensured that the terrorists had an ironclad grip over the funds they generated – and that Khamenei could direct it to attacks.

91. In at least six different ways explained below, the Terrorist Sponsors have used the money flowing to them to provide vital support for Iran's terrorist proxies.

1. Money and Incentive Payments

92. Iran's Terrorist Sponsors have provided money to facilitate attacks. Because U.S. dollars were particularly valuable for terrorist operations, Iran's proxies depended on access to the international financial system to finance every aspect of their lethal attacks, and Iran's Terrorist Sponsors facilitated that access through their commercial fronts and banks. Such Iranian dollars have supplied the logistical spine for Axis proxies upon which their attacks relied.

93. Throughout the relevant period, the Terrorist Sponsors have also funded at least five distinct types of attack-specific payments to IRGC, Hizballah, Hamas, PIJ, and JAM operatives that enabled attacks, including, but not limited to, the following.

94. **Salary payments** have financed attack-related operations, intelligence, logistics, and leadership cell operatives, including Khamenei Cell members.

⁶⁸ Rasool Nafisi, *Iran's Revolutionary Guard Has A Lot To Lose*, Radio Free Europe/Radio Liberty (Sept. 18, 2009).

95. **Martyr payments** have been made to the families of terrorist martyrs when an attacker died (*i.e.*, was “martyred”).

96. **Bounty payments** have been made to terrorist operatives for successful attacks and calibrated to especially promote such attacks through larger bounties awarded for successful attacks killing, injuring, or capturing a U.S. victim as compared to non-U.S.-victims.

97. **Disability payments** have been made to terrorist operatives, and their families, if such operatives were injured while supporting a terrorist attack, which often cost at least several thousand U.S. dollars per year.

98. **Orphan payments** have been made to the caretakers of the children of terrorist operatives who were killed while supporting a terrorist attack, which were made to reward and incentivize terrorist attacks by ensuring that the operative’s child will be looked after by the terrorist group, as well as to enable recruitment of child terrorists by Iran’s proxies.

2. Training

99. Throughout the relevant period, Iran trained Hizballah and used Hizballah to train its other proxies, including JAM, Hamas, PIJ, and al-Qaeda, among others. As Treasury reported in 2024: “Iran has trained thousands of Hizballah fighters” to “conduct terrorist operations globally” and, “[i]n turn, Hizballah has helped train and equip other Iran-aligned terrorist organizations, including Hamas” and “Hizballah leaders” also “armed and trained Shia militias that carried out attacks on U.S. forces during their 2003-2011 deployment to Iraq.”⁶⁹ The Terrorist Sponsors supplied (and/or paid for) attack-related training, including, but not limited to, in IRGC, Hizballah, and RGB training camps located in, *inter alia*, Iran, Iraq, Lebanon, Syria, and North Korea. Such training was rigorous and multi-month, among other features.

⁶⁹ U.S. Dep’t of the Treas., *FinCEN Alert to Financial Institutions to Counter Financing of Hizballah and its Terrorist Activities*, FIN-2024-Alert003, at 3 (Oct. 23, 2024).

100. North Korean training has strengthened the IRGC's and Hizballah's terrorist tactics, techniques, and procedures (or "TTP") since the early 1980s, and directly flowed through to their proxies through the IRGC and Hizballah. North Korea has provided extensive North Korean-derivative terrorist TTP—materials, training courses, and trainers—to the IRGC and Hizballah since the early 1980s and ever since, which included IRGC/Hizballah training (based on DPRK training), IRGC-funded North Korean trainers deployed in Iran, Lebanon, and Syria, and IRGC-funded IRGC and Hizballah training by North Koreans in the DPRK.

3. Weapons

101. The Terrorist Sponsors, along with Irancell, IEI, and TCI, have used resources and technologies from the Terrorist Sponsors' commercial activities to design, build, transport, supply, and maintain the arms and weapons systems required for, *inter alia*, missile, rocket, mortar, uncrewed aerial vehicle ("UAV"), RPG, and small arms attacks, among others. The Terrorist Sponsors have supplied these arms to Hizballah, the IRGC, JAM, Hamas, PIJ, and al-Qaeda, among others, to power their attacks globally. Throughout the relevant period, Iran has provided all of the arms referenced below to Hizballah, Hamas, PIJ, and JAM (including KH), and has provided at least small arms and RPGs to al-Shabaab.

102. **Missile Attacks.** Iran has directly financed and supplied the specific missile types, including the *Qaem*-class short-range ballistic missiles, *Toophan*-class anti-tank guided missiles, and *Fateh*- and *Shahab*-class ballistic missiles used in Hizballah's, JAM's, and the IRGC's missile attacks in Iraq and Syria, which the IRGC sourced in substantial part through North Korean aid. IEI has made key components that optimized their lethality, with funding from the Terrorist Sponsors, including profits from Irancell. IEI, with funds from the Terrorist Sponsors, has also manufactured the IRGC's Rocket and Missile Command Cabin, which Hizballah, Kataib Hizballah, and the IRGC used to fire *Fateh*-class missiles.

103. **Rocket and Mortar Attacks.** Iran has directly financed and supplied the specific rocket and mortar types used in Hizballah's, JAM's, and the IRGC's rocket and mortar attacks in Iraq and Syria. IEI has manufactured these key components that have optimized their lethality, with funding from the Terrorist Sponsors, including profits from Irancell. Hizballah, IRGC, and their proxies ordinarily trained to use a suite of common IEI-manufactured rocket and mortar systems that were designed to maximize the accuracy and associated lethality of the attacks, *e.g.*, wireless fire control systems, laser range finders, specially designed optics, artillery fire control computers; mobile multiple-launch rocket systems, proximity fuses; large-bore mortar sights, and *Hadid*-series mortars. Hizballah, the IRGC, and JAM ordinarily relied upon IEI-supplied technologies to remotely fire their rockets and mortars; through such remote firing, they have eliminated the risk that their terrorist operatives would be killed in U.S. counter-fire strikes targeting the site from which the rocket or mortar was launched.

104. **UAV Attacks.** Iran has directly financed and supplied the UAVs used in Hizballah's, JAM's, and the IRGC's UAV attacks in Iraq and Syria. IEI has manufactured these UAVs with funding from the Terrorist Sponsors, including profits from Irancell. IEI has manufactured and supplied specific UAV-related weapons and weapons systems including, but not limited to, *Shahed*-class UAVs, command and control centers, VHF airborne ground radio communication systems, frequency hopping airborne radios, *Oghab* electro-optical aerial cameras, air data computers, *Sadid*-class guided bombs, *Qaem*-class air-to-ground munitions, electro-optical multi-sensor gyro stabilized payloads, and UHF airborne radio communication systems. From at least 2019-2023, UAVs were the most important arms in the Terrorist Sponsors' arsenal. The terrorists have used UAVs not only as bombs, but also to enable nearly all their other attack types, including, but not limited to, rocket, missile, complex, mortar, IED,

and hostage-taking attacks. In those attacks, Iran-supplied UAVs have provided, *inter alia*, targeting assistance, defensive overwatch, and protection of safehouses holding hostages.

105. **RPG Attacks.** Iran has directly financed and supplied the specific RPG types used in Hizballah's, JAM's, Hamas's, PIJ's, and al-Shabaab's RPG attacks, complex attacks, and hostage taking in Iraq, Israel, Kenya, and Syria, among other places. The RPG-7 and RPG-29, for which IEI manufactured the key optics, have been among the most vital arms in the Terrorist Sponsors' arsenal. IEI has also manufactured key proximity fuses like the M122-K.

106. **Small Arms Attacks.** Iran has directly financed and supplied the specific types of small arms used in small arms attacks—and complex and hostage-taking attacks for which small arms were also crucial—by Hizballah, JAM, and the IRGC in Iraq, by Hamas and PIJ in Israel, and by al-Shabaab in Kenya. A reliable, easy-to-use, and effective gun has always been a foundational component of every terrorist operative's toolkit. IEI has manufactured, and Hizballah and the IRGC have supplied, key components of such arms to their Axis proxies, including, but not limited to, *Ghadir*-class optics for Dragunov sniper rifles, night vision sights for rifles, and night vision sights for crew-served and heavy weapons.

4. Recruitment and Children

107. Throughout the relevant period, the Terrorist Sponsors have used resources and technologies from the Terrorist Sponsors' commercial activities to recruit IRGC, Hizballah, JAM (including Kataib Hizballah), Hamas, and PIJ operatives, including children, to power attacks. U.S. government reports have confirmed that Iran relied upon industrial-scale recruitment of child fighters to power attacks by the IRGC, Hizballah, and their proxies. In 2020, for example, State reported that “the Islamic Republic ... frequently turns to unconventional tactics to sustain

and assist its partners and proxies. This includes the ... use of child soldiers in hostilities.”⁷⁰ “In 2018,” according to State, “Human Rights Watch documented and condemned the IRGC’s practice of recruiting child soldiers for the Fatemiyoun, uncovering evidence that Afghans as young as 14 have died in combat in Syria. Following a full assessment of Iranian activities, ... State listed Iran under the Child Soldiers Prevention Act for the first time in 2018, and ... State listed Iran again in 2019.”⁷¹ In 2018, Treasury sanctions against the IRGC emphasized that it used the funds, intelligence, and data it gathered through its commercial companies to enable its recruitment and deployment of child terrorists in support of IRGC-sponsored proxy attacks.⁷²

5. Intelligence and Intelligence-Gathering Tools

108. Throughout the relevant period, the Terrorist Sponsors, along with Irancell and IEI, have used resources and technologies from the Terrorist Sponsors’ commercial activities to manufacture and supply intelligence tools, including, but not limited to, targeting data, signals intelligence, and systems for internet and telecommunications content monitoring, filtering, and eavesdropping. The Terrorist Sponsors have supplied these intelligence tools to Hizballah and the IRGC, among others, to power their attacks throughout the Middle East, including their targeting of specific Americans. Iran has provided every aspect of the below described intelligence aid to, at least, the IRGC and Hizballah, throughout the relevant period.

109. **Irancell Customer Data.** The IRGC and Hizballah have used Irancell to source intelligence for operations. For example, the IRGC and Hizballah have used Irancell towers to “ping” the civilian phones carried by U.S. forces in Iraq so that the Terrorist Sponsors could

⁷⁰ U.S. Dep’t of State, *Outlaw Regime: A Chronicle Of Iran’s Destructive Activities*, at 26 (Sept. 17, 2020) (“*Outlaw Regime*, 2020 ed.”).

⁷¹ *Id.*

⁷² U.S. Dep’t of the Treas., *Treasury Sanctions Vast Financial Network Supporting Iranian Paramilitary Force That Recruits and Trains Child Soldiers* (Oct. 16, 2018).

more effectively target Americans. Moreover, Irancell's ability to weaponize data was not limited to activity in Iran and Iraq. Irancell could—and did—use the data it obtained from Irancell-related telecoms activity outside Iran, which was substantial because Irancell phones (and therefore, the data trove the Terrorist Sponsors could weaponize) were interoperable throughout nearly all the countries most vital to the IRGC, including Syria, Israel, and Kenya.

110. **Radio and Radar Systems.** Iran and IEI have supplied VHF/UHF radio monitoring systems, short range ground surveillance radars, long range surveillance systems, electronic support measures scopes, and tactical radio monitoring systems.

6. **Logistics, Communications, and Electronic Warfare Systems**

111. The Terrorist Sponsors, along with Irancell and IEI, have used resources and technologies from the Terrorist Sponsors' commercial activities to manufacture, supply, upgrade, and maintain key logistics, communications, and electronic warfare technologies and systems designed to support rocket, UAV, hostage-taking, missile, and IED attacks by Hizballah, the IRGC, JAM, Hamas, PIJ, and al-Qaeda. Throughout the relevant period, Iran has provided: (1) all the systems listed below to the IRGC, Hizballah, JAM, Hamas, and PIJ; (2) communications systems to al-Qaeda and, on information and belief, al-Shabaab.

112. **Logistics Systems.** Iran's logistics-related assistance has materially strengthened the lethality of the attacks by providing secure communications technologies (including mobile phones), fake identity papers, ratlines and safe houses, transportation of weapons, and assistance with movement of funds. Iran has also provided high performance night vision binoculars, thermal cameras, and monocular night vision goggles to enable their attacks.

113. **Communications Systems.** Iran has supplied IEI-manufactured, military-grade, tactical communications technologies and systems critical to the attacks, including, but not limited to, VHF/UHF radio encryption systems, multi-band radio communication systems,

encrypted radios, vehicular radios, VHF transceivers, digital radio relays, ground radio communication systems, tactical communication vehicles, encrypted mobile phones, tactical cellular communications networks, tactical integrated communication systems, multi-layered communications systems, tactical digital switchboards, and digital radio relays. These communications systems have assisted all attacks by Iran's proxies, regardless of weapon type.

114. **Electronic Warfare Systems.** Iran has supplied IEI-manufactured electronic warfare technologies and systems for the attacks, including, but not limited to, GPS jammers and customized electronic warfare command and control solutions. These communications systems have assisted attacks by all of Iran's proxies.

D. Iran's Assistance Was Essential to Each Terrorist Group's Attacks.

115. Iran's provision of arms, funds, and training to JAM, Hamas, PIJ, and al-Qaeda has materially strengthened each group's ability to attack Americans in the Middle East and Africa from 2019 through 2023. As the White House explained in 2006: "State sponsors are a critical resource for our terrorist enemies, often providing funds, weapons, training, safe passage, and sanctuary" that were vital to successful "act[s] of international terrorism," for which U.S. policy recognized that the "Islamic Revolutionary Guard Corps" was one of the Terrorist Sponsors, and one of the groups through which "the regime in Tehran plans terrorist operations and supports groups such as Lebanese Hizballah, Hamas, and Palestine Islamic Jihad (PIJ)."⁷³

1. Hizballah

116. **Funding.** From at least 2000 through 2023, the Terrorist Sponsors supplied funds to Hizballah amounting to around at least 70% of Hizballah's budget in any given year, with Hizballah supplying the rest through criminal activities and contributions from a global Lebanese

⁷³ White House, *National Strategy for Combating Terrorism*, at 15 (Sept. 2006).

diaspora.⁷⁴ As State reported in 2023: “Iran’s annual financial backing to Hizballah . . . estimated to be hundreds of millions of dollars annually . . . accounts for the overwhelming majority of the group’s annual budget.”⁷⁵ Throughout this period, Iranian funds increased the lethality of Hizballah’s attacks, as well as Hizballah-sponsored attacks by Hizballah or Iran’s other proxies like Hamas or al-Shabaab.⁷⁶

117. **Weapons.** From at least 2000 through 2023, the Terrorist Sponsors supplied arms to Hizballah, including, but not limited to, rockets, bombs, small arms, missiles, and UAVs. Iranian arms have increased the lethality of Hizballah attacks in Iraq and Syria.⁷⁷

118. **Training.** From at least 2000 through 2023, the Terrorist Sponsors supplied training to Hizballah, ordinarily acting through the IRGC (inclusive of IRGC contracting of the RGB to train Hizballah). Iranian training of Hizballah has leveraged the power of Iran’s and North Korea’s decades of terrorist operations history, practices, and lessons learned. Such IRGC-backed, IRGC- and North Korean-supplied Hizballah training has included, but not been limited to, tactics, techniques, and procedures; unit tactics; rockets; small arms; hostage taking; communications; recruitment; fundraising; and propaganda. Such Iranian-supplied training has increased the lethality of Hizballah attacks and Hizballah-sponsored attacks by proxies.⁷⁸

119. **Recruitment.** From at least 2000 through 2023, the Terrorist Sponsors supplied vital recruitment aid to Hizballah, which bolstered Iran’s ability through its proxies to attack

⁷⁴ See, e.g., U.S. Dep’t of the Treas., *FinCEN Advisory to Financial Institutions to Counter the Financing of Iran-Backed Terrorist Organizations*, FIN-2024-A001, at 9-10 (May 8, 2024).

⁷⁵ U.S. Dep’t of State, *Country Reports on Terrorism 2022* at 276 (Nov. 2023).

⁷⁶ See, e.g., U.S. Dep’t of the Treas., *Treasury Targets Hizballah Network in Africa* (May 27, 2009); U.S. Dep’t of the Treas., *National Terrorist Financing Risk Assessment*, at 10 (Dec. 2018); U.S. Dep’t of State, *Country Reports on Terrorism 2021* at 291 (Feb. 2023).

⁷⁷ See, e.g., U.S. Dep’t of State, *Outlaw Regime*, 2020 ed., at 12-14.

⁷⁸ See, e.g., U.S. Dep’t of the Treas., *Treasury Targets Additional Sources of Support and Financing to Hamas* (Oct. 27, 2023).

Americans worldwide.⁷⁹ Such Iranian aid also powered Hizballah’s recruitment of large numbers of children to serve as fighters.⁸⁰

120. **Intelligence.** From at least 2000 through 2023, the Terrorist Sponsors supplied intelligence support to Hizballah. Iranian intelligence aid increased the lethality of Hizballah-led, JAM-committed attacks in Iraq and Syria throughout this period.⁸¹

121. Each lane of Iranian aid above materially strengthened Hizballah’s ability to conduct attacks targeting Americans in Iraq, Syria, and Israel, including Plaintiffs.

122. Each lane of Iranian aid above materially strengthened Hizballah’s ability to sponsor Hamas, PIJ, JAM (including Kataib Hizballah), and al-Qaeda (including al-Shabaab) attacks targeting Americans in Iraq, Syria, Israel, and Kenya, including Plaintiffs.

2. Jaysh al-Mahdi (JAM), including Kataib Hizballah

123. The Terrorist Sponsors’ aid has enabled Hizballah’s and JAM’s attacks in Iraq and Syria. In 2018, for example, State reported that “IRGC-QF” resources were a key means through which “Iran” programmatically “provid[ed] funding, training, weapons, and equipment” to “Lebanese Hizballah” and “Kata’ib Hizballah (KH) in Iraq” to finance, arm, and logistically sustain Hizballah’s and Kataib Hizballah’s attacks against U.S. troops in Iraq and Syria.⁸² State’s 2019 and 2020 reports, similarly, confirmed the “IRGC continu[e]d to provide financial and

⁷⁹ See, e.g., U.S. Dep’t of State, *2022 Country Reports on Human Rights Practices: Iran* at 28 (Mar. 2023).

⁸⁰ See, e.g., U.N. Sec. Council, *Children and Armed Conflict: Report of the Secretary-General* ¶ 99 (June 20, 2019).

⁸¹ See, e.g., U.S. Off. of the Dir. of Nat’l Intel., *Counterterrorism Guide: Islamic Revolutionary Guard Corps (IRGC)* (Mar. 2022).

⁸² U.S. Dep’t of State, *Iran Action Group, Outlaw Regime: A Chronicle of Iran’s Destructive Activities*, at 9-10 (Sept. 2018).

other material support, training, technology transfer, advanced conventional weapons, guidance, or direction to a broad range of terrorist organizations, including ... Kata'ib Hizballah in Iraq.”⁸³

124. Treasury sanctions designations targeting Hizballah have confirmed that senior Hizballah operatives have directly enabled attacks in Iraq and Syria throughout the relevant period, including, but not limited to, Hassan Nasrallah, Naim Qasim, Muhammad Kawtharani, Yusuf Hashim, Adnan Kawtharani, Muhammad ‘Abd-al-Hadi Farhat, Ahmad Abdallah, Muhammad Qasir, Muhammad Qasim al-Bazzal, and Ali Mussa Daqduq al-Musawi.⁸⁴

125. **Funding.** From at least 2003 through 2023, the Terrorist Sponsors supplied funds to JAM, including Kataib Hizballah, amounting to at least half of JAM’s budget, and usually through Hizballah. Iranian funds increased the lethality of Hizballah-led, JAM-committed attacks in Iraq and Syria throughout this period.⁸⁵

126. **Weapons.** From at least 2003 through 2023, the Terrorist Sponsors supplied arms to JAM, including Kataib Hizballah, including, but not limited to, rockets, bombs, small arms, missiles, and UAVs, and usually through Hizballah. Iranian arms increased the lethality of Hizballah-led, JAM-committed attacks in Iraq and Syria throughout this period.⁸⁶ For example, UAVs were used in each attack in Iraq and in Syria that injured Plaintiffs, and JAM terrorists

⁸³ U.S. Dep’t of State, *Country Reports on Terrorism 2019* at 266 (June 2020); U.S. Dep’t of State, *Country Reports on Terrorism 2020* at 272 (Dec. 2021).

⁸⁴ See, e.g., U.S. Dep’t of Treas., *Treasury Designates Hizballah Commander Responsible for American Deaths in Iraq* (Nov. 19, 2012); U.S. Dep’t of Treas., *Treasury Sanctions Hizballah Leadership* (Aug. 22, 2013); U.S. Dep’t of the Treas., *Treasury and the Terrorist Financing Targeting Center Partner Together to Sanction Hizballah’s Senior Leadership* (May 16, 2018); U.S. Dep’t of the Treas., *Treasury Sanctions Key Hizballah, IRGC-QF Networks in Iraq* (Nov. 13, 2018); U.S. Dep’t of the Treas., *Terrorist Financing Targeting Center Jointly Designates Network of Corporations, Banks, and Individuals Supporting IRGC and Hizballah* (Oct. 30, 2019); U.S. Dep’t of the Treas., *Treasury Targets Hizballah Financial Network’s Abuse of the Business Sector* (May 19, 2022).

⁸⁵ See U.S. Dep’t of State, *Country Reports on Terrorism 2018* at 119 (Oct. 2019).

⁸⁶ See U.S. Dep’t of State, *Country Reports on Terrorism 2022* at 205-6 (Nov. 2023).

have publicly admitted they relied upon Iran-supplied UAVs during the relevant period. In 2020 and 2021, for example, Kataib Hizballah admitted on its official social media channels that Iranian aid was vital to its ability to conduct attacks using UAVs—which describes every attack against Plaintiffs in Iraq in Syria—when Kataib Hizballah publicly displayed its IRGC-supplied drones containing above-described IED weapons in social media posts and parades in 2020-2021.

127. **Training.** From at least 2003 through 2023, the Terrorist Sponsors supplied training to JAM, including Kataib Hizballah. Ordinarily acting through Hizballah and the IRGC, Iranian training of JAM worked through the power of Hizballah’s well-honed, field-tested, training regimes. Such IRGC-backed, Hizballah-directed JAM training included, but was not limited to, tactics, techniques, and procedures; unit tactics; rockets; small arms; hostage taking; communications; recruitment; fundraising; and propaganda. As DoD reported in 2010, the “IRGC-QF is responsible for training Iraqi insurgents in Iran,” and “Lebanese Hizballah provides insurgents with the training, tactics and technology to conduct kidnappings, small unit tactical operations and employ sophisticated IEDs.”⁸⁷ This “material support to terrorist ... groups” included providing “Kata’ib Hizballah (KH)—an Iraqi Shia terrorist group—and other Iraqi militant groups with weapons and training” on “small arms, reconnaissance, small unit tactics, and communications.”⁸⁸ “Some individuals or groups receive more specialized training in assassinations, kidnappings, or explosives.”⁸⁹ This “Iranian materiel assistance and training increased the lethality of ... improvised rockets, enhancing the capabilities of the supported groups.”⁹⁰ Such practices endured throughout, and powered Hizballah/JAM attacks.⁹¹

⁸⁷ U.S. Dep’t of Def., *Unclassified Report on Military Power of Iran* at 3 (Apr. 2010).

⁸⁸ *Id.* at 8-9.

⁸⁹ *Id.* at 9.

⁹⁰ *Id.*

⁹¹ *See, e.g.,* U.S. Dep’t of State, *Country Reports on Terrorism 2022* at 205-6 (Nov. 2023).

128. **Recruitment.** From at least 2003 through 2023, the IRGC also helped JAM, including Kataib Hizballah, recruit terrorists to conduct attacks (with Hizballah as interlocutor) and powering the process throughout through programmatic attack payments. In 2023, State reported that Iran “provided financial but also military and fighter recruitment support to armed groups... through[out] the Middle East”; this included “the IRGC-Qods Force directly ... assisting in the recruitment of fighters” for the Terrorist Sponsors’ proxies by, *inter alia*, “providing support to pro-Iran militias ... in Iraq.”⁹² The Terrorist Sponsors always supplied vital recruitment aid to JAM, including Kataib Hizballah, which enhanced the lethality of Iran’s proxy attacks targeting Americans in Iraq and Syria.⁹³ Throughout the relevant period, such Iranian aid also powered Kataib Hizballah’s recruitment of large numbers of children to serve as fighters in Iraq and Syria.⁹⁴ Among other ways, the Terrorist Sponsors helped KH recruit child fighters through Iran-funded youth camps, including youth soccer camps. In 2019, Kataib Hizballah admitted as much on Facebook by publishing this image of children saluting its flag:



⁹² U.S. Dep’t of State, *2022 Country Reports on Human Rights Practices: Iran* at 28 (Mar. 2023).

⁹³ See, e.g., U.S. Dep’t of State, *2022 Country Reports on Human Rights Practices: Iran* at 28 (Mar. 2023).

⁹⁴ See, e.g., U.N. Sec. Council, *Children and Armed Conflict: Report of the Secretary-General* ¶¶ 68-69 (June 9, 2020).

129. **Intelligence.** From at least 2003 through 2023, the Terrorist Sponsors supplied intelligence support to JAM, including Kataib Hizballah, usually acting through Hizballah. Iranian intelligence aid increased the lethality of Hizballah-led, JAM-committed attacks.⁹⁵

130. Each lane of Iranian aid above materially strengthened JAM's, including Kataib Hizballah's ability to conduct attacks targeting Americans in Iraq and Syria, including Plaintiffs.

3. Hamas and Palestinian Islamic Jihad (PIJ)

131. The Terrorist Sponsors' aid has enabled Hamas and PIJ attacks in Israel. In 2009, for example, State noted that "Iran remained the most active state sponsor of terrorism," "Iran's involvement in the planning and financial support of terrorist attacks throughout the Middle East . . . had a direct impact," including through funds by the "Qods Force[, which] provided aid in the form of weapons, training, and funding to HAMAS and other Palestinian terrorist groups."⁹⁶ In 2010, similarly, Treasury imposed counterterrorism sanctions targeting Hizballah and the Qods Force upon finding that the "IRGC-QF" supply of "support" to "designated terrorist groups" like "Hamas" through IRGC-funded, Hizballah-supplied, "training, weapons, and money" continued "bolstering" Hamas's "ability to maintain its armed resistance."⁹⁷

132. **Funding.** From at least 2000 through 2023, the Terrorist Sponsors supplied funds to Hamas and PIJ, amounting to at least half of Hamas's and PIJ's respective budgets, and usually through Hizballah, which increased the lethality of Hamas and PIJ attacks in Israel.⁹⁸

⁹⁵ See, e.g., U.S. Dep't of State, *Outlaw Regime*, 2018 ed., at 9-10.

⁹⁶ U.S. Dep't of State, *Country Reports on Terrorism 2008* at 182 (Apr. 2009).

⁹⁷ U.S. Dep't of the Treas., *Fact Sheet: U.S. Treasury Department Targets Iran's Support for Terrorism Treasury Announces New Sanctions Against Iran's Islamic Revolutionary Guard Corps-Qods Force Leadership* (Aug. 3, 2010).

⁹⁸ See, e.g., Def. Intel. Agency, *Iran Military Power* at 62; U.S. Dep't of the Treasury, *2024 National Terrorist Financing Risk Assessment* at 14 (Feb. 2024).

133. **Weapons.** From at least 2000 through 2023, the Terrorist Sponsors supplied arms to Hamas and PIJ, including, but not limited to, rockets, bombs, small arms, missiles, and UAVs, and usually through Hizballah, which enabled Hamas and PIJ attacks in Israel.⁹⁹

134. **Training.** From at least 2000 through 2023, the Terrorist Sponsors supplied training to Hamas and PIJ. Ordinarily acting through Hizballah and the IRGC, Iranian training of JAM worked through the power of Hizballah's well-honed, field-tested, training regimes, as augmented by North Korean support paid for by Iran (*see infra* ¶ 147). Such IRGC-backed, Hizballah-directed Hamas and PIJ training included, but was not limited to, tactics, techniques, and procedures; unit tactics; rockets; small arms; hostage taking; communications; recruitment; fundraising; and propaganda. Throughout the relevant period, such Iranian training endured and increased the lethality of Hamas and PIJ attacks in Israel.¹⁰⁰

135. **Recruitment.** Prior to 2023, the IRGC and Hizballah have supplied vital recruitment aid to Hamas, which bolstered the latter's ability to conduct attacks in Israel.¹⁰¹ In May 2021, for example, in the aftermath of Hamas's and PIJ's massive wave of rocket attacks targeting Israel, "Iran transferred briefcases of cash to Hamas and Palestinian Islamic Jihad to be used to recruit and indoctrinate youth."¹⁰² Backed by Iran for decades, Hamas and PIJ recruited large numbers of fighters from the ranks of children.¹⁰³ Indeed, body-cam footage of terrorists

⁹⁹ See, e.g., U.N. Sec. Council, *Implementation of Security Council Resolution 2231 (2015); Fifth Report Of The Secretary-General* ¶ 43 (June 12, 2018); U.S. Dep't of State, *Country Reports on Terrorism 2020* at 262 (Dec. 2021).

¹⁰⁰ See, e.g., Def. Intel. Agency, *Iran Military Power* at 62.

¹⁰¹ U.S. Dep't of State, *2022 Country Reports on Human Rights Practices: Iran* at 28 (Mar. 2023).

¹⁰² United Against Nuclear Iran, *How Iran Exports Its Ideology*, at 51 (Nov. 2023).

¹⁰³ See, e.g., Amelia Navins and Lenny Ben-David, *Hamas' Human Rights Violations in the 2021 Gaza War*, Jerusalem Ctr. For Sec. & Foreign Aff. (June 29, 2021); Lenny Ben-David, *Palestinian Militias in Jenin Deployed Teenage Girls to Report on Israeli Troop Movements During Combat*, Jerusalem Ctr. For Sec. & Foreign Aff. (Aug. 16, 2023).

preparing for the October 7 Attack showed “school-aged boys holding guns and dressed in military uniforms,”¹⁰⁴ the Israeli army reportedly found “small explosive belts” adapted to fit children at a Gaza kindergarten,¹⁰⁵ and Israel estimated in January 2024 that there were, at least, “more than 170 minors” working for Hamas and PIJ throughout Gaza.¹⁰⁶

136. Each lane of Iranian aid identified above has materially strengthened Hamas’s and PIJ’s ability to conduct attacks targeting Americans in Israel, including Plaintiffs.

4. Al-Qaeda, including al-Shabaab

137. The Terrorist Sponsors’ aid has enabled al-Qaeda’s and al-Shabaab’s attacks in Kenya. Iran has also long provided material support and resources to al-Qaeda, which has strengthened its attacks worldwide. As a U.S. federal court previously found, at a 1993 meeting in Sudan, “representatives of Iran, Hizballah, and al Qaeda worked out an alliance of joint cooperation and support on terrorism.”¹⁰⁷ “The 1993 meeting in [Sudan] led to an ongoing series of communications, training arrangements, and operations among Iran and Hizballah and al Qaeda” and “bin Laden sent more terrorist operatives” to “Hizballah training camps.”¹⁰⁸

138. Al-Qaeda’s collaboration with Iran and Hizballah has included al-Qaeda’s operations in Africa. When the U.S. Department of Justice indicted Osama bin Laden for the 1998 bombings of the U.S. embassies in Kenya and Tanzania, the indictment alleged that al-Qaeda had “forged alliances” with “the government of Iran and its associated terrorist group

¹⁰⁴ Ryan Merrifield, *Hamas Commanders ‘Training Boys to Fight Israeli Forces Preparing to Storm Gaza’*, mirror.co.uk, (Oct. 16, 2023).

¹⁰⁵ Ronny Reyes, *Israel Under Attack: Explosive Belts in Kids’ Sizes Chilling Hamas Trove Seized in Gaza K’garten*, N.Y. Post, (Dec. 25, 2023).

¹⁰⁶ Alyssa Guzman, *Israel Under Attack: Little Devils Revel in Hamas Horrors*, N.Y. Post, (Jan. 4, 2024).

¹⁰⁷ *In re Terrorist Attacks on Sept. 11, 2001*, No. 03 MDL 1570 (GBD), 2011 WL 13244047, at *11 (S.D.N.Y. Dec. 22, 2011) (findings of fact).

¹⁰⁸ *Id.*

Hezb[o]llah for the purpose of working together against their perceived common enemies in the West, particularly the United States.”¹⁰⁹ A U.S. federal court subsequently found that Iran had caused these African embassy bombings by materially supporting al-Qaeda’s operations.¹¹⁰

139. Following the September 11, 2001 attacks, Iran met with senior al-Qaeda leaders and pledged to provide funds and logistical support to facilitate attacks targeting Americans. Under this secret deal, Iran intensified its material support for al-Qaeda’s terrorist campaign.

140. Iran was the but-for cause of every al-Qaeda attack since 2001. As Osama bin Laden personally (and correctly) concluded, al-Qaeda would have collapsed after 2001 without the secret deal and Iran’s key support for al-Qaeda in the years following 9/11, and al-Qaeda’s subsequent ability to execute terrorist attacks depended upon Iran being al-Qaeda’s “main artery for funds, personnel, and communication.”¹¹¹

141. The United States has recognized that the close partnership between Iran and al-Qaeda after the secret deal between them enabled al-Qaeda attacks. In 2009, Treasury targeted al-Qaeda operatives in Iran who provided funds and logistical aid to Qaeda attacks worldwide.¹¹² In 2011, Treasury designated as SDGTs six members of al-Qaeda operating in Iran under the previously described secret agreement between Iran and al-Qaeda, after finding, *inter alia*, that: (1) “Iran’s secret deal with al-Qa’ida” provided that al-Qaeda terrorists “must refrain from conducting any operations within Iranian territory and recruiting operatives inside Iran while keeping Iranian authorities informed of their activities” for which, “[i]n return, the Government

¹⁰⁹ Indictment at 3 [Dkt. 1], *United States v. Bin Laden*, No. 1:98-cr-00539-LAK (S.D.N.Y. filed Nov. 5, 1998).

¹¹⁰ *Owens v. Republic of Sudan*, 826 F. Supp. 2d 128, 151 (D.D.C. 2011).

¹¹¹ Oct. 18, 2007 translated letter from Osama bin Laden to Karim at 1, *Bin Laden’s Bookshelf*, U.S. Off. of the Dir. of Nat’l Intel. (2016).

¹¹² U.S. Dep’t of the Treas., *Treasury Targets Al Qaida Operatives in Iran* (Jan. 16, 2009).

of Iran gave the Iran-based al-Qa'ida network freedom of operation and uninhibited ability to travel for extremists and their families” and permitted al-Qaeda to use Iran as a “critical transit point for funding to support [al-Qaeda’s] activities”; and (2) the secret deal facilitated a terrorist network that “serves as the core pipeline through which al-Qa’ida moves money, facilitators and operatives from across the Middle East to South Asia.”¹¹³ In 2012, Treasury designated the Iranian Ministry of Intelligence and Security as a terrorist-sponsoring entity for, among other things, supporting al-Qaeda.¹¹⁴ In 2016, “Treasury took action to disrupt the operations, fundraising, and support networks that help al-Qaida move money and operatives from South Asia and across the Middle East by imposing sanctions on three al-Qaida senior members located in Iran”—sponsored by Iran under the secret deal—who were “responsible for moving money and weapons across the Middle East” to enable “al-Qaida’s terrorist activity” by supplying “al-Qaida [] its critical support networks.”¹¹⁵ And in 2017, State reported, “Since at least 2009, Iran has allowed [al-Qaeda] facilitators to operate a core facilitation pipeline through the country.”¹¹⁶

142. After al-Shabaab declared its allegiance to al-Qaeda in 2012, Iranian material support and resources flowed to al-Shabaab in Africa, often routed through Hizballah. As one scholar explained in 2020, “Iran has established covert ties with the Somalia-based al-Shabab terrorist group well known for its attacks in the Horn of Africa,” and “Tehran is allegedly using al-Shabab to attack the U.S. military and other foreign forces in Somalia and in the region,

¹¹³ U.S. Dep’t of the Treas., *Treasury Targets Key Al-Qa’ida Funding and Support Network Using Iran as a Critical Transit Point* (July 28, 2011).

¹¹⁴ U.S. Dep’t of the Treas., *Treasury Designates Iranian Ministry of Intelligence and Security for Human Rights Abuses and Support for Terrorism* (Feb. 16, 2012).

¹¹⁵ U.S. Dep’t of the Treas., *Treasury Designates Three Senior Al-Qaida Members* (July 20, 2016).

¹¹⁶ U.S. Dep’t of State, *Country Reports on Terrorism 2016* at 304 (July 2017).

according to senior Somali government and security officials familiar with intelligence and briefed on the matter.”¹¹⁷

143. From at least 2012 through 2024, Iran has provided training, weapons, funding, and logistical support to al-Shabaab that was vital to its ability to commit attacks in Kenya. According to U.N. monitors, Iran and al-Shabaab established a distribution network to ship Iranian weapons through Yemen to northern Somalia “after which they are moved farther south into Shabaab strongholds.”¹¹⁸ Like it did with Hizballah, JAM, and Hamas, Iran also offered “bounties” to al-Shabaab to reward successful attacks targeting Americans. As two scholars observed in 2020, “Iranian forces are supporting al-Shabab and allegedly offering bounties. The US government must stop Tehran before it further destabilizes the Horn of Africa.”¹¹⁹

144. Each lane of Iranian aid identified above has materially strengthened al-Qaeda’s, including al-Shabaab’s, attacks targeting Americans in Kenya, including Plaintiffs.

III. North Korea Has Provided Vital Support to Each Terrorist Group’s Attacks.

145. North Korea is “hostile to the United States” as “a matter of policy,” and for decades it has “attempted to undermine the political, economic, and strategic power and influence of the United States and its democratic allies.”¹²⁰ Accordingly, North Korea’s support for Iran’s terrorist aims throughout the Middle East has been deep and longstanding. As Kim Il Sung, the founder and former President of North Korea, explained: “The Middle East crisis is the result of aggressive machinations by imperialists and their American masterminds, who have set

¹¹⁷ Muhammad Fraser-Rahim and Mo Fatah, *In Somalia, Iran Is Replicating Russia’s Afghan Strategy*, Foreign Policy (July 17, 2020).

¹¹⁸ Louis Charbonneau, *Exclusive: U.N. Monitors See Arms Reaching Somalia From Yemen*, Reuters (Feb. 11, 2013).

¹¹⁹ Fraser-Rahim and Fatah, *supra*.

¹²⁰ *Kaplan v. Central Bank of the Islamic Republic of Iran*, 55 F. Supp. 3d 189, 193 (D.D.C. 2014) (findings of fact).

up Jewish restorationists as shock troops to crush the rising Arab people's liberation struggle.”¹²¹ As part of the Axis of Resistance targeting America and its allies, North Korea has consistently provided vital material support to Axis terrorist attacks through its support of Hizballah, the IRGC, Hamas, PIJ, and al-Shabaab, among others. As the Secretary of Defense confirmed in 2010: “The fact is that North Korea continues to smuggle missiles and weapons to other countries around the world,” including to “Iran, Hezbollah, [and] Hamas.”¹²² Since 2010, North Korea has continued aiding Hezbollah, the IRGC, Hamas, and Iran's Axis proxies.¹²³

A. Hizballah and the IRGC

146. North Korea's aid has enabled Hizballah's and the IRGC's attacks worldwide, including in Iraq, Syria, Israel, and Kenya. North Korea has provided training, weapons, and attack tunnel expertise to Hizballah and the IRGC that enabled their attacks globally—and such FTOs' ability to sponsor attacks by others, including JAM, Hamas, and al-Qaeda. Given Hizballah's and the IRGC's fused nature, any time North Korea aided one, it aided the other.

147. For decades, North Korea has engaged in a joint weapons enterprise with Iran and Hizballah. Under that arrangement, North Korea has proliferated weapons, including ballistic missiles, to Iran and Hizballah both through direct sales and by providing technical assistance. North Korea has also proliferated weapons to Iran's terrorist proxies. The North Korean-Iran-Hizballah joint weapons enterprise has often involved a weapons-for-oil barter arrangement, where North Korea supplies weapons to Iran and Hizballah in exchange for oil. U.S. and U.N. reports and sanctions designations confirm it is beyond peradventure that Iran, Hizballah, and

¹²¹ Abraham Cooper and Greg Scarlatoiu, *North Korea's Support of Hamas Transcends a Purely Transactional Relationship*, Jerusalem Post Online (Dec. 4, 2023).

¹²² Victor D. Cha and Gabriel Scheinmann, *North Korea's Hamas Connection: 'Below' the Surface?*, Nat'l Interest (Sept. 4, 2014).

¹²³ See, e.g., Jerusalem Post Online, *North Korea Training and Providing Arms to Hamas, Hezbollah, and Houthis – Report* (Jan. 17, 2024).

North Korea operated a joint weapons enterprise that materially strengthened the IRGC's, Hizballah's, and their proxies' ability to conduct attacks. For example, U.S. and U.N. reports have confirmed that the IRGC, Hizballah, and North Korea have operated a "joint venture" with respect to missiles. North Korean-supplied weapons and missile technologies have been instrumental in the IRGC's and Hizballah's attacks, including the January 8, 2020 Attack here.

148. North Korean aid has powered Hizballah's attacks and ability to sponsor proxy attacks. That aid started with Hizballah leadership: beginning around the late 1980s, top Hizballah leaders, including Hassan Nasrallah (Hizballah's former secretary-general), visited North Korea to receive military training.¹²⁴ In the early 2000s, North Korean military personnel were dispatched to southern Lebanon, where they leveraged their expertise to help build extensive underground military installations and an elaborate system of tunnels.¹²⁵

149. North Korea's RGB built terror tunnels (paid for by Iran) that have powered Hizballah-sponsored attacks by Hamas and PIJ in Israel since the 2000s, including the October 7 Attack. These tunnels have been broadly viewed as Hamas's and PIJ's single most important weapons, and they played a key role in that Attack. The RGB's training and expertise in tunnel-building has been essential to Hizballah's ability to construct these tunnels because "Hezbollah alone does not have that capability," according to a scholar.¹²⁶ To construct Hizballah tunnels in southern Lebanon, for example, "[t]he Iranians contracted the North Koreans," who provided engineers through the Korea Mining Development Trading Corporation and moved into southern

¹²⁴ See Mark E. Manyin, *North Korea: Back on the Terrorism List?*, Cong. Rsch. Serv., RL30613 (June 29, 2010); Carl Anthony Wege, *The Hizballah-North Korean Nexus*, Small Wars J. (Jan. 23, 2011).

¹²⁵ See *id.*

¹²⁶ Yaakov Lappin, *Security and Defense: The North Korean Connection*, Jerusalem Post Online (Mar. 16, 2016).

Lebanon “disguised as Chinese domestic workers.”¹²⁷ Likewise, in Gaza, the concrete reinforcements used to strengthen the tunnels “are North Korean characteristics” and reflect “a North Korean modus operandi . . . [that] repeats itself all over the region” due to the training and expertise that North Korea has provided to Hizballah and its terrorist collaborators.¹²⁸

150. U.S. government reports confirm North Korean aid has strengthened Hizballah’s and the IRGC’s ability to conduct and sponsor terrorist attacks. In 2008, for example, the Minority Staff of the House Foreign Affairs Committee published a confidential analysis of the Iran-North Korean-Hizballah relationship (which was promptly shared with media outlets). The analysis described an “extensive program by North Korea to provide arms and training to Hezbollah.”¹²⁹ “North Korean training of Hezbollah cadre reportedly began in the late 1980s and early 1990s, including training in North Korea,” and “reportedly expanded after 2000” when “North Korea is said to have dispatched trainers to southern Lebanon where they instructed Hezbollah cadre in the development of extensive underground military installations.”¹³⁰

151. In 2014, a U.S. federal court made findings of fact that “North Korea provided Hezbollah with a wide variety of material support and resources,” including “professional military and intelligence training and assistance in building a massive network of underground military installations, tunnels, bunkers, depots and storage facilities in southern Lebanon,” and the DPRK “worked in concert with Iran and [] Syria to provide rocket and missile components to Hezbollah.”¹³¹ North Korea “sent these rocket and missile components to Iran where they were

¹²⁷ *Id.*

¹²⁸ *Id.*

¹²⁹ Congressional Research Serv. (Larry Niksch), *quoted in* Rep. Ileana Ros-Lehtinen, *North Korea’s Support for Terrorist Groups and State Sponsors of Terrorism*, at 1-2 (May 8, 2008).

¹³⁰ *Id.*

¹³¹ *Kaplan*, 55 F. Supp. at 193.

assembled and shipped to Hezbollah in Lebanon via Syria,” and the Court found such rocket and missile components “were intended by North Korea and Hezbollah to be used and were in fact used by Hezbollah to carry out rocket and missile attacks against Israeli civilian targets.”¹³²

152. North Korean aid has materially strengthened Hizballah’s and the IRGC’s ability to conduct terrorist attacks targeting Americans in Iraq, Syria, and Israel, including Plaintiffs. Indeed, a mine run of official U.S. and U.N. reports have confirmed that North Korea supplied vital weapons, technical, and logistical aid that fueled Hizballah and IRGC attacks.¹³³

153. North Korean aid has materially strengthened Hizballah’s and the IRGC’s ability to sponsor Hamas, PIJ, JAM (including Kataib Hizballah), and al-Qaeda (including al-Shabaab) attacks targeting Americans in Iraq, Syria, Israel, and Kenya, including Plaintiffs.

B. Hamas and PIJ

154. North Korea’s aid has enabled Hamas’s and PIJ’s attacks in Israel. North Korea manufactured and supplied weapons used by Hamas, PIJ, and Iran’s other terrorist proxies,

¹³² *Id.*

¹³³ See, e.g., U.S. Dep’t of the Treas., *Treasury Targets North Korea’s Missile Proliferation Network* (June 30, 2009); U.N. Sec. Council, *Decision of the Security Council Committee Established Pursuant to Resolution 1718 (2006) Dated 16 July 2009* ¶ 2 (July 16, 2009); U.S. Dep’t of the Treas., *Treasury Designates North Korean Bank and Banking Official as Proliferators of Weapons of Mass Destruction* (Oct. 23, 2009); U.S. Dep’t of Def., *Unclassified Report on Military Power of Iran*, at 11 (Apr. 2010); U.S. Dep’t of the Treas., *United States Designates North Korean Entities and Individuals for Activities Related to North Korea’s Weapons of Mass Destruction Program* (Aug. 30, 2010); U.N. Sec. Council, *Report of the Panel of Experts Established Pursuant to Resolution 1874 (2009)* ¶¶ 48-50 (Nov. 5, 2010); U.S. Dep’t of the Treas., *Treasury Designates Financial Institution Involved in Facilitating North Korea’s Illicit Activities* (Apr. 19, 2011); U.N. Sec. Council, *Report of the Panel of Experts Established Pursuant to Resolution 1874 (2009)* ¶ 72 (May 17, 2011); U.N. Sec. Council, *Report of the Security Council Committee Established Pursuant to Resolution 1718 (2006)* ¶¶ 2-4 (May 2, 2012); U.N. Sec. Council, *Report of the Panel of Experts Established Pursuant to Resolution 1874 (2009)* ¶ 58 (June 14, 2012); U.N. Sec. Council, *Resolution 2087 (2013) Adopted by the Security Council at its 6904th Meeting, on 22 January 2013* (Jan. 22, 2013); U.S. Dep’t of the Treas., *Treasury Sanctions Company and Individuals Linked to North Korean Weapons of Mass Destruction Program* (Jan. 24, 2013); U.N. Sec. Council, *Resolution 2270 (2016) Adopted by the Security Council at its 7638th Meeting, on 2 March 2016* (Mar. 2, 2016).

including RPGs, rockets, small arms, and missile components. As the October 7 Attack demonstrated, North Korean arms have played a critical role in Hamas and PIJ attacks in Israel throughout the relevant period.¹³⁴ Arms recovered from the Attack, including RPGs, bore telltale indicators that they were supplied by the DPRK, including Korean marks and red stripes.¹³⁵

155. According to the deputy commander of Israel's enemy equipment collection unit, "tens of thousands of North Korean weapons were recovered" after the October 7 Attack.¹³⁶ The RGB reportedly supplied many, if not most, of the RPGs used during that attack.

156. Video imagery of the October 7 Attack also shows Hamas and/or PIJ terrorists employing North Korea's Type 58 self-loading assault rifle, and North Korean artillery shells marked "Bang-122" were found on the Israel-Gaza border.¹³⁷ Israeli intelligence also reportedly assessed that North Korea supplied vital components for Hizballah missiles fired into Israel.

157. Hamas's use of paragliders during the October 7 Attack was another telltale indicator of North Korean support because such tactics were a DPRK specialty, and Hamas used such gliders to devastating effect during the attack.¹³⁸

158. Earlier events demonstrate the depth and consistency of North Korea's support to Hamas and PIJ. In 2009, for example, a shipment from North Korea of 35 tons of weapons, including rockets, was interdicted in Thailand and later revealed to be intended for delivery to

¹³⁴ See, e.g., Voice of Am., *republished in* Int'l Bus. Times News, *North Korea Continues Weapons Export Despite UN Sanctions; The News Comes Amid Kim Jong Un Regime's Continuous Violation of the Nuclear Weapons Program, Despite Tough U.N. Sanctions* (Feb. 23, 2017), 2017 WLNR 5795122.

¹³⁵ Jiha Ham and Christy Lee, *SKorea's Spy Agency: Hamas Used North Korean Weapons Against Israel*, Voice of America (Jan. 8, 2024).

¹³⁶ *Id.*

¹³⁷ Michael Freund (former Deputy Communications Director, Prime Minister of Israel), *The North Korea-Hamas Connection*, Jerusalem Post (Nov. 24, 2023).

¹³⁸ See, e.g., Thomas Maresca, *North Korea Likely Supplying Weapons, Sharing Tactics with Hamas, South Korea Says*, UPI NewsTrack (Oct. 17, 2023).

Hamas and Hizballah, through Iran. The Thailand seizure followed several similar incidents, including an Iran-bound ship, the ANL Australia, with cargo originating in North Korea intercepted in the UAE. The cargo included North Korean small arms, military hardware, thousands of detonators for 122mm rockets, other rocket components, and sufficient explosive powder to arm thousands of short-range rockets like those used in attacks by Hamas, PIJ, and Hizballah.¹³⁹ U.S. officials reportedly said that the ANL Australia was one of five vessels caught that year carrying large caches of weapons intended for Hizballah, Hamas, and/or the IRGC, many of which included North Korea-made weapons.

159. North Korean aid has materially strengthened Hamas's and PIJ's ability to conduct Hamas and PIJ attacks targeting Americans in Israel, including Plaintiffs.

C. Al-Qaeda, including al-Shabaab

160. North Korea's aid has enabled al-Qaeda's and al-Shabaab's attacks in Kenya. When North Korea supplied funding, weapons, training, and attack tunnel expertise to the IRGC and Hizballah, North Korea did so for at least two purposes as to each group. *First*, to enable the IRGC and Hizballah to directly commit their own attacks. *Second*, to enable the IRGC and Hizballah to fund proxy attacks, arm proxies, train proxies, and secure weapons intended for redistribution to proxies through the tunnels that North Korea had helped build.

161. North Korea's support for proxies through the IRGC and Hizballah has supplied potent aid to attacks committed by al-Qaeda and al-Shabaab worldwide, including against Plaintiffs. Among other reasons, DPRK-built tunnels have enabled IRGC and Hizballah to smuggle arms to al-Qaeda affiliates in Africa, including al-Shabaab.

¹³⁹ See, e.g., U.N. Sec. Council, *Report of the Panel of Experts Established Pursuant to Resolution 1874 (2009)* ¶ 61 (Nov. 5, 2010); NBC News, *Israel: N. Korean Arms Were for Islamist Groups* (May 12, 2010).

162. North Korea has regularly supplied weapons used by al-Qaeda and al-Shabaab in their attacks. A U.N. panel of experts found in 2020, for example, that mortar rounds fired at a U.N. compound in Somalia by al-Shabaab were manufactured in North Korea.¹⁴⁰ U.N. monitors and journalists have also reported al-Shabaab receiving North Korea-made IEDs and machine guns.¹⁴¹ North Korea has maintained strong ties in the Horn of Africa, and “[s]ince the early 1990s, Pyongyang has sold equipment to Somali government forces and militant groups alike.”¹⁴² On information and belief, Iran also purchased weapons from North Korea and supplied them to al-Shabaab, including, but not limited to, small arms, mortars, and IEDs.

163. North Korean training has also supplied the foundation for al-Qaeda’s and al-Shabaab’s terrorist TTP through the IRGC and Hizballah. *Supra* ¶ 100. The IRGC and Hizballah have supplied their North Korean-derived terrorist TTP to al-Qaeda and al-Shabaab’s predecessor groups, starting in the early 1990s and continuing ever since. Accordingly, North Korean-derived terrorist TTP supplied to Iran (through the IRGC and Hizballah) has served as the foundation for al-Qaeda’s, including al-Shabaab’s, attack-related terrorist tradecraft that was instrumental to the attack against Plaintiffs. And that result, in turn, accorded with North Korea’s specific intent when aiding Iran: to help Iran directly and indirectly enable anti-American violence worldwide.

164. North Korean aid has materially strengthened the IRGC’s ability to sponsor al-Qaeda and al-Shabaab attacks targeting Americans in Kenya, including Plaintiffs.

¹⁴⁰ U.N. Sec. Council, *Report of the Panel of Experts Pursuant to Resolution 751 (1992)*, at 58-59 (Sept. 28, 2020).

¹⁴¹ Joe DeCapua, *Weapons Flowing to Somali Militants*, Voice of Am. News (Feb. 12, 2013).

¹⁴² Samuel Ramani, *North Korea’s Military Partners in the Horn of Africa*, Diplomat (Jan. 6, 2018).

165. North Korean aid has materially strengthened Hizballah's ability to sponsor al-Qaeda and al-Shabaab attacks targeting Americans in Kenya, including Plaintiffs.

D. North Korea Aided Anti-American Attacks to Further the DPRK's Counterpressure Conspiracy that Targeted the Eastern District of Virginia.

166. From at least 2017 through 2023, North Korea conspired with others, including, but not limited to, Iran and Hizballah, to accomplish the same objectives as the Iranian counterpressure conspiracy (*i.e.*, eliminate sanctions on Iran), in addition to North Korea's objective of coercing the United States to end sanctions targeting the DPRK, including its sponsorship of terrorism.

167. The counterpressure campaign that focused on ending U.S. sanctions on North Korea began no later than 2007. The DPRK and its co-conspirators aimed to free North Korea from U.S. sanctions by: (1) degrading existing U.S. economic sanctions on North Korea; (2) deterring the United States from imposing additional sanctions on North Korea or expanding existing sanctions; and (3) compelling the United States to repeal its economic sanctions on North Korea. To accomplish this objective, the conspirators used several mechanisms, including but not limited to, threatening violence against Americans in response to sanctions to pressure decision makers in the United States, and by enabling or committing anti-American terrorist attacks with weapons supplied by North Korea or developed with North Korean assistance. Each mechanism was a way for the conspirators to demonstrate that U.S. sanctions on North Korea were ineffective, costly, and risked American lives.

168. North Korea's threats to respond violently to U.S. sanctions as part of its (and Iran's) counterpressure conspiracy directly targeted the United States government and persons in the Eastern District of Virginia, including, but not limited to, Americans working at the headquarters of DoD (the Pentagon), and in Treasury's FinCEN bureau, both of which are in this

District. Indeed, in connection with North Korea’s missile tests in 2014, the head of the DPRK military’s General Political Bureau warned that “[i]f the U.S. imperialists threaten our sovereignty and survival . . . our troops will fire . . . at the White House and the Pentagon -- the sources of all evil.”¹⁴³

E. North Korea Generated Profits and Intelligence from Illicit Commercial and Cyber Activity in America, including in the Eastern District of Virginia, that Powered its Sponsorship of Terrorism.

169. **Cyber Crimes.** To fund and bolster terrorist attacks targeting the United States in the Middle East, North Korea has engaged in a multi-year campaign of cyber hacking and related intelligence-gathering activities on Americans in the United States,¹⁴⁴ including in the Eastern District of Virginia. According to a July 25, 2024 Joint Cybersecurity Advisory, “the RGB 3rd Bureau includes a DPRK (aka North Korean) state-sponsored cyber group,” which “primarily targets defense, aerospace, nuclear, and engineering entities to obtain sensitive and classified technical information and intellectual property to advance the regime’s military and nuclear programs and ambitions.”¹⁴⁵ State-sponsored North Korean hackers have targeted the Pentagon,¹⁴⁶ among other sites located in the Eastern District of Virginia. North Korea’s more conventional intelligence collection efforts have also targeted military sites in the Eastern District of Virginia in November 2023, as confirmed by a state-run North Korean agency.¹⁴⁷

¹⁴³ Nat’l J., *North Korean Military Officer Threatens to Nuke the White House* (July 28, 2014) (first ellipses in original).

¹⁴⁴ See, e.g., U.S. Dep’t of the Treas., *Treasury Targets DPRK’s International Agents and Illicit Cyber Intrusion Group* (Nov. 30, 2023).

¹⁴⁵ U.S. Dep’t of Justice, *et al.*, *Joint Cybersecurity Advisory: North Korea Cyber Group Conducts Global Espionage Campaign to Advance Regime’s Military and Nuclear Programs*, at 1-2 (July 25, 2024).

¹⁴⁶ Matthew Shaer, *North Korean Hackers Blamed for Sweeping Cyber Attack on US Networks*, Christian Science Monitor (July 8, 2009).

¹⁴⁷ Preston Steger and Mike Gooding, *North Korea Claims Spy Satellite Photographed Naval Station Norfolk, and a Shipyard in Virginia*, WVEC 13News Now (Nov. 30, 2023).

170. **Cigarette Smuggling and Intellectual Property Crimes.** North Korea also illicitly manufactured and smuggled cigarettes to fund terrorism, including its joint weapons venture with Hizballah and Iran.¹⁴⁸ North Korean smokers preferred to smoke, and smuggle, “American” brands comprising “Virginia” tobacco.¹⁴⁹ And North Korea coveted profits from the U.S. market: throughout the relevant period, the DPRK manufactured and smuggled illicit counterfeit cigarettes into the United States on a massive scale.¹⁵⁰ Indeed, “[f]rom 2002 to 2005” alone, “counterfeit Marlboro® cigarettes, originating from North Korea, were detected in 1,300 incidents within U.S. jurisdiction.”¹⁵¹ The DPRK manufactured many of its illicit cigarettes in China, and distributed many of them through Chinese smuggling networks, as well as smuggling networks affiliated with organized crime groups in central and South America.¹⁵² A substantial percentage of these North Korean-produced cigarettes were smuggled into America. In 2005, for example, U.S. authorities “seized more than a billion fake smokes, many allegedly from North

¹⁴⁸ See, e.g., U.S. Dep’t of State, *International Narcotics Control Strategy Report: Volume II: Money Laundering and Financial Crimes*, at 316 (Feb. 2009); U.N. Sec. Council, *Report of the Panel of Experts Established Pursuant To Resolution 1874 (2009)* ¶ 17 (Nov. 5, 2010); U.S. Dep’t of State, *International Narcotics Control Strategy Report: Volume I: Drug and Chemical Control*, at 141 (Mar. 2013).

¹⁴⁹ See GlobalData, *Cigarettes in North Korea, 2019* (2019) (“American and Virginia [tobacco] blends dominate the [DPRK cigarette] import sector”).

¹⁵⁰ See, e.g., U.S. Dep’t of State, U.S. Dep’t of Justice, U.S. Dep’t of the Treas., *et al.*, *The Global Illicit Trade in Tobacco: A Threat to National Security* 12-13 (Dec. 2015).

¹⁵¹ *Id.* at 13.

¹⁵² See, e.g., Dr. David Asher, *quoted in* Fed. News Serv. Transcripts, *House Financial Services Committee hearing on A Dangerous Nexus: Terrorism, Crime and Corruption* (May 21, 2015), 2015 WLNR 15384487 (“The largest export from North Korea, believe it or not, is counterfeit cigarettes coming out of North Korean government-controlled, criminally-run factories. They’re making maybe as much as 700 to a billion dollars a year in revenue on these. And we have them trafficking all over the United States. Frequently, they appear in the press as coming out of China. But they’re actually just coming through China, because North Korea doesn’t export directly to the United States particularly.”).

Korea.”¹⁵³ In 2007, the Congressional Research Service reported that North Korea’s “[g]ross revenues from such sales” could “generate between \$520 and \$720 million annually.”¹⁵⁴

171. North Korea’s ability to finance its joint weapons venture with Iran and Hizballah through its illicit cigarette trade has depended, in part, upon the DPRK’s willingness to inflict harm on victims in the Eastern District of Virginia. North Korea has imbued its black-market cigarettes with the imprimatur of Marlboro® by committing intellectual property (or “IP”) crimes in this District.¹⁵⁵ This District-related nexus has bolstered the resulting terrorist violence the DPRK could enable because it has enhanced the street value of North Korea’s illicit cigarettes on the black market by leveraging Marlboro®’s iconic, universally known, branding.¹⁵⁶ Those IP crimes have occurred in Richmond in this District, where Philip Morris USA has owned, managed, and profited from Marlboro® intellectual property, and where Philip Morris USA has been injured by the DPRK’s systemic misappropriation of Philip Morris USA’s intellectual property to power North Korea’s sponsorship of terrorism by enhancing the street

¹⁵³ Gordon Fairclough, *Tobacco Firms Trace Fakes to North Korea*, Wall St. J. (Jan. 27, 2006).

¹⁵⁴ Raphael Perl and Dick K. Nanto, *North Korean Crime-for-Profit Activities*, Cong. Rsch. Serv., RL33885 (Feb. 16, 2007).

¹⁵⁵ See, e.g., Daily NK, “Cat Cigarette”, *The Typical Bribe in North Korea* (Mar. 2, 2006) (North Korea’s illicit tobacco trade uses DPRK-manufactured counterfeit Marlboro® cigarettes).

¹⁵⁶ See, e.g., Ben Benton, *Tennessee, Georgia Differ on How to Combat Fake Cigarette Tax Stamps*, Chattanooga Times (Feb. 24, 2008), 2008 WLNR 3683598 (“‘Cigarette smuggling has national-security implications,’ [Georgia State Senator David Shafer] said. Sen. Shafer said he was chairman of a study committee last year where witnesses testified that money from the sale of fake-stamped cigarettes is being used to fund Islamic terrorism. China and North Korea [among others] ... manufacture cigarettes that counterfeit American brands. Profits filter back through the black market to terrorist organizations, federal officials told the committee. ‘The Chinese army, which operates a dozen cigarette manufacturing plants in China, is exporting counterfeit Marlboros complete with phony American tax stamps,’ Sen. Shafer said. Philip Awe is the Alcohol and Tobacco Enforcement branch chief for the Bureau of Alcohol, Tobacco, Firearms and Explosives who testified before Sen. Shafer’s committee. Mr. Awe said the problem is worldwide and permeates the tobacco market from top to bottom.”).

resale value, and ease of resale, of North Korean's illicit cigarettes¹⁵⁷—directly increasing the funds and logistical support that North Korea could source for its joint weapons venture with Hizballah and Iran through increased DPRK cigarette smuggling profits linked to this District.

172. In so doing, North Korea has directly connected its provision of material support to the IRGC's, Hizballah's, Hamas's, and al-Shabaab's attacks against Plaintiffs to the DPRK's cigarette smuggling and IP crimes against Philip Morris USA, among others, in the Eastern District of Virginia. Consistent with the Secretary General of Interpol's testimony before Congress in 2003, for example, North Korea's conduct has created a “direct connection between financing of terrorism and intellectual property crime” in this District because “established terrorist organizations” located in “any country or any location in the world”—which has always described North Korean terrorist arms like the RGB—“are going to use” IP crime “in part for their financing,” including “individuals involved in raising millions of dollars for Hezbollah and other terrorist organizations in the Middle East” through, *inter alia*, “pirating ... cigarettes.”¹⁵⁸

IV. The Attacks That Killed or Injured Plaintiffs Were Committed by Iran's and North Korea's Agents with Material Support and Resources from Iran and North Korea.

173. Plaintiffs were killed or injured in seven terrorist attacks committed by Hizballah, JAM (including Kataib Hizballah), Hamas, PIJ, and al-Qaeda (including al-Shabaab) in Iraq, Syria, Israel, and Kenya between 2019 and 2023. Each of these terrorist attacks was committed,

¹⁵⁷ See, e.g., AP Alert – Virginia, *Chinese Officials in Va to Discuss Fake Cigarettes* (Sept. 18, 2012) (“the top U.S. cigarette maker, Philip Morris USA,” was based “in the Richmond area” and concerned about “counterfeit Marlboro cigarettes found on the black market” that were exported from “China”); John Reid Blackwell, *Cigarette Companies Seek to Disrupt Smuggling*, Richmond Times Dispatch (Mar. 23, 2015), 2015 WLNR 8456541 (“Henrico County-based Altria” said its “efforts to track and disrupt illegal smuggling of its cigarette brands” through “illegal cigarette trafficking from Virginia” to the north reflected that such conduct “inflicts a human and financial toll” and “cigarette trafficking” was “a Virginia problem”).

¹⁵⁸ Ronald K. Noble, Sec'y Gen., Interpol, *quoted in* U.S. House of Reps., Comm. on Int'l Relations, Hearing: “Intellectual Property Crimes: Are Proceeds From Counterfeited Goods Funding Terrorism?”, Serial No. 108–48 (July 16, 2003).

planned, and/or authorized by terrorists acting as Iran's and North Korea's agents; was facilitated by the Terrorist Sponsors; and was enabled by material support and resources provided by Iran and North Korea. As further explained below, at least some, if not all, of the vital support from the Defendants described above in Parts II and III contributed to each attack described in Part IV.

174. Each of the attacks described below was intended to kill Americans and constituted an act, or attempted act, of extrajudicial killing. Plaintiffs' injuries resulting from the attacks at issue were reasonably foreseeable or a natural consequence of both Defendants' conduct. When Iran and North Korea provided the material support and resources detailed in this Complaint, they did so to enable extrajudicial killing, including the targeting of Americans.

A. The December 27, 2019 Rocket and UAV Attack in Iraq (Hamid Family)

175. On December 27, 2019, a joint cell comprised of Hizballah and JAM (including Kataib Hizballah), funded, armed, and logistically supported by the Terrorist Sponsors, and acting as an agent of Iran, committed a rocket and UAV attack on the K-1 Air Base in Kirkuk, Iraq (the "December 27, 2019 Attack"). The December 27, 2019 Attack constituted an extrajudicial killing. It was planned and authorized by Hizballah, Kataib Hizballah, and the IRGC, including Hizballah Secretary General Hassan Nasrallah, senior Hizballah Iraq-operations leaders Mohammad Kawtharani and Yusuf Hashim, IRGC-QF Commanders Qasem Soleimani and Esmail Qaani, IRGC-IO Commander Hossein Taeb, and Kataib Hizballah leader Abu Mahdi al-Muhandis— each of whom acting as an agent for Iran and through the Khamenei Cell.

176. Iran aided the December 27, 2019 Attack by, *inter alia*, providing, through the SLO and IRGC (including IRGC-QF and IRGC-IO), direct operational support to the attack teams, including intelligence from IRGC-supplied UAVs and satellite imagery and weapons including IRGC-made rockets, rocket launchers, artillery computer systems, and optics, and by providing money and incentive payments, through the Terrorist Sponsors, to operatives from the

IRGC, Hizballah, and JAM involved in the Attack. The United States has confirmed that Iran supplied vital aid to the Attack, including in State reports to Congress,¹⁵⁹ DoD's press release announcing the Soleimani strike,¹⁶⁰ and its *Counterterrorism Guide*.¹⁶¹

177. North Korea aided the December 27, 2019 Attack by, *inter alia*, providing training to Hizballah operatives involved in the December 27, 2019 Attack, as well as weapons and/or weapon components used in the December 27, 2019 Attack.

178. **Nawres Hamid** was in Iraq as a civilian working for Valiant Integrated Services at the time of the attack. Nawres Hamid was injured in the December 27, 2019 Attack. He died on December 27, 2019, as a result of injuries that he sustained during the Attack.

179. Nawres Hamid was a U.S. national at the time of the Attack and his death.

180. Plaintiff Noor Alkhalili is the widow of Nawres Hamid and a U.S. national.

181. Plaintiff A.W., by and through his next friend Noor Alkhalili, is the minor son of Nawres Hamid. He is a U.S. national.

182. Plaintiff H.W., by and through his next friend Noor Alkhalili, is the minor son of Nawres Hamid. He is a U.S. national.

183. As a result of the December 27, 2019 Attack and Nawres Hamid's injuries and death, each member of the Hamid Family has experienced severe mental anguish, emotional pain and suffering, and the loss of his society, companionship, and counsel.

184. As a result of the December 27, 2019 Attack, Nawres Hamid was injured in his person and/or property. The Plaintiff members of the Hamid Family are the survivors and/or heirs of Nawres Hamid and are entitled to recover for the damages that he sustained.

¹⁵⁹ See, e.g., U.S. Dep't of State, *Country Reports on Terrorism 2019* at 110 (June 2020).

¹⁶⁰ U.S. Dep't of Def., *Statement by the Department of Defense* (Jan. 2, 2020).

¹⁶¹ U.S. Office of the Dir. of Nat'l Intel., *Counterterrorism Guide: Kata'ib Hizballah* (2022).

B. The January 5, 2020 Complex Attack in Kenya (Harrison and Mayfield Families)

185. On January 5, 2020, al-Shabaab (a designated FTO at the time) committed a complex attack involving rocket propelled grenades, small arms fire, and mortars in Lamu, Kenya (the “January 5, 2020 Attack”). Al-Shabaab is a branch of, and received funding and logistical support from, al-Qaeda. The January 5, 2020 Attack constituted an extrajudicial killing.

186. Iran aided the January 5, 2020 Attack by, *inter alia*, providing, through the Terrorist Sponsors, financial, logistical, intelligence, and operational support to attacks directed by al-Qaeda’s global operations headquarters in Iran from 2017 through the 2020. On information and belief, the January 5, 2020 Attack was materially strengthened by the Terrorist Sponsors’ supply to al-Shabaab (through al-Qaeda), of communications, telecommunications, and/or computing technologies manufactured by, or owned by, the Terrorist Sponsors, IEDC, IEI, Irancell, and/or TCI—all acting as agents of Iran—to help commit and plan the January 5, 2020 Attack. On information and belief, the Terrorist Sponsors directly supplied to al-Shabaab a substantial number of the weapons used during the January 5, 2020 Attack, including, but not limited to: (1) small arms with IEI-manufactured optics; and (2) RPGs with IEI-manufactured optics, including, but not limited to, RPG-29s with such optics.

187. North Korea aided the January 5, 2020 Attack by, *inter alia*, providing training, weapons, and terrorist tunnels to the IRGC and Hizballah, who relied upon such goods and services to train, arm, and logistically support al-Shabaab’s ability to conduct attacks targeting the United States in Kenya, including the Attack. On information and belief, North Korea also aided the January 5, 2020 Attack by, *inter alia*, providing weapons to al-Shabaab operatives prior to the Attack, which aided al-Shabaab’s ability to commit the Attack.

188. **Dustin Harrison** was in Kenya as a civilian working for DoD at the time of the attack. Dustin Harrison was injured in the January 5, 2020 Attack. He died on January 5, 2020, as a result of injuries that he sustained during the Attack.

189. Dustin Harrison was a U.S. national at the time of the Attack and his death.

190. Plaintiff Hope Harrison is the widow of Dustin Harrison and a U.S. national.

191. Plaintiff H.H., by and through her next friend Hope Harrison, is the minor daughter of Dustin Harrison. She is a U.S. national.

192. Plaintiff Donna Harrison is the mother of Dustin Harrison and a U.S. national.

193. Plaintiff Marlin Harrison is the brother of Dustin Harrison and a U.S. national.

194. Plaintiff Heide Ryan is the sister of Dustin Harrison and a U.S. national.

195. As a result of the January 5, 2020 Attack and Dustin Harrison's injuries and death, each member of the Harrison Family has experienced severe mental anguish, emotional pain and suffering, and the loss of his society, companionship, and counsel.

196. As a result of the January 5, 2020 Attack, Dustin Harrison was injured in his person and/or property. The Plaintiff members of the Harrison Family are the survivors and/or heirs of Dustin Harrison and are entitled to recover for the damages that he sustained.

197. **Specialist Henry Mayfield Jr.** served in Kenya as a member of the U.S. Army at the time of the attack. SPC Mayfield was injured in the January 5, 2020 Attack. He died on January 5, 2020, as a result of injuries that he sustained during the Attack.

198. SPC Mayfield was a U.S. national at the time of the Attack and his death.

199. Plaintiff Henry Mayfield Sr. is the father of SPC Mayfield and a U.S. national.

200. Plaintiff Danielle Davis is the sister of SPC Mayfield and a U.S. national.

201. Plaintiff Taliyah Davis is the sister of SPC Mayfield and a U.S. national.

202. Plaintiff Ronald Edwards is the brother of SPC Mayfield and a U.S. national.

203. Plaintiff Michael Mayfield is the brother of SPC Mayfield and a U.S. national.

204. Plaintiff Nicholas Mayfield is the brother of SPC Mayfield and a U.S. national.

205. Plaintiff Tyshauna White is the sister of SPC Mayfield and a U.S. national.

206. Plaintiff Carmoneta Horton-Mayfield is the stepmother of SPC Mayfield and a U.S. national. Ms. Horton-Mayfield lived in the same household as SPC Mayfield for a substantial period and considered SPC Mayfield the functional equivalent of a biological son.

207. Plaintiff Tyron Edwards is the stepbrother of SPC Mayfield and a U.S. national. Mr. Edwards lived in the same household as SPC Mayfield for a substantial period and considered SPC Mayfield the functional equivalent of a biological brother.

208. Plaintiff Ciara Martin is the stepsister of SPC Mayfield Jr. and a U.S. national. Ms. Martin lived in the same household as SPC Mayfield Jr. for a substantial period and considered SPC Mayfield Jr. the functional equivalent of a biological brother.

209. As a result of the January 5, 2020 Attack and SPC Mayfield's injuries and death, each member of the Mayfield Family has experienced severe mental anguish, emotional pain and suffering, and the loss of his society, companionship, and counsel.

210. As a result of the January 5, 2020 Attack, SPC Mayfield was injured in his person and/or property. The Plaintiff members of the Mayfield Family are the survivors and/or heirs of SPC Mayfield and are entitled to recover for the damages that he sustained.

C. The January 8, 2020 Complex Attack on Al Asad Airbase in Iraq (Deer Family, Brandon Godwin, Byron Hogan, Torrin McDougle, Ryan Nolan, Rodney Ragin, Jacob Schmidt, Shepard Family, and Spears Family)

211. On January 8, 2020, a combined terrorist group comprised of IRGC terrorists in Iran drawn from the IRGC-QF, IRGC-IO, and IRGC-Missile Command and a joint Hizballah/JAM cell in Iraq—all of which were funded, armed, and logistically supported by the

Terrorist Sponsors and acting as agents of Iran—committed a complex attack featuring missiles and UAVs targeting the United States at Al Asad Air Base, Iraq (the “January 8, 2020 Attack”).¹⁶² The January 8, 2020 Attack constituted an extrajudicial killing. The January 8, 2020 Attack was committed, planned, and authorized by, *inter alia*, Hizballah, JAM (including Kataib Hizballah), the IRGC-QF, and IRGC-IO, including Hizballah leaders Hassan Nasrallah, Mohammad Kawtharani, and Yusuf Hashim, and IRGC leaders Esmail Qaani, Mohsen Rezai, and Hossein Taeb—each of whom was in the Khamenei Cell and acting as an agent of Iran. Qods Force Commander Qasem Soleimani, senior IRGC and Foundation for the Oppressed leaders Mohsen Rafiqdoost and Mohsen Rezai, and dual-hatted Qods Force/Kataib Hizballah operations leader Abu Mahdi al-Muhandis—each of whom was in the Khamenei Cell and acting as an agent of Iran—also planned and authorized the Attack. Hizballah led the Attack.

212. The January 8, 2020 Attack was a complex and well-planned strike that reflected extensive preparation, including Kataib Hizballah terrorists who served as spies under the cover of being employed as contractors at Al Asad Air Base, coordinated strikes on multiple United States facilities in Iraq, a ground attack team that likely included more than twenty Hizballah and Kataib Hizballah terrorists, and several waves of complementary strikes. The January 8, 2020 Attack’s first wave of missiles landed at around 1:30 A.M. local time and lasted for several hours. The January 8, 2020 Attack featured waves of IRGC missile attacks and ground-based strikes targeting the United States in Iraq, as well as Tehran-based countermeasures, which were all supported by Hizballah and Kataib Hizballah UAVs in Iraq and IRGC satellites in orbit.

¹⁶² The January 8, 2020 Attack is sometimes referred to as having occurred on “January 7”. Both are correct; the attack began late on January 7 and continued into January 8. In this Complaint, Plaintiffs describe such attack as the “January 8, 2020 Attack”.

213. According to Plaintiffs' recollections, witness statements, and Hizballah's customs and practices and tactics, techniques, and procedures, the combined terrorist ground assault team deployed a comprehensive mix of weapons, including, but not limited to, missiles, rockets, satellites, UAVs, RPG-29 grenade launchers, RPG optics, mortars, artillery optics, small arms, night-vision optics, sniper rifle optics, ground radar, jammers and electronic warfare devices, encrypted mobile phones, encrypted two-way Motorola radios, encrypted computer communications networks, laptops, and infrastructure for battlefield communications; and artillery rounds with proximity fuses. On information and belief, the January 8, 2020 Attack leveraged Hizballah's and Kataib Hizballah's network of child terrorists in Iraq, who were deployed to U.S. bases to develop pattern of life intelligence.

214. The January 8, 2020 Attack intentionally targeted civilians in the United States who were not taking part in hostilities. As the U.S. government, Iranian regime, IRGC, and media outlets publicly reported, the IRGC launched a coordinated disinformation campaign alongside its ground attack to lead Americans to believe that more than 80 U.S. servicemembers were killed. As IRGC-controlled IRIB reported, quoting "a source close to . . . [the] IRGC": "More than 80 U.S. forces have reportedly been killed during Iranian missile strikes to intended U.S. targets in Iraq on [January 8, 2020]."¹⁶³ The IRGC's disinformation campaign was designed to terrorize the families of U.S. servicemembers serving in Iraq by instilling fear that their loved ones had been killed. This campaign created confusion and panic in the chaotic 12 to 24-hour period after the January 8, 2020 Attack, even though the IRGC knew it had not killed any American servicemembers in Iraq. The IRGC and Hizballah have regularly deployed similar

¹⁶³ Tehran Times, *Over 80 U.S. Forces Dead in Iran Missile Attack to Targets in Iraq* (Jan. 8, 2020), 2020 WLNR 599906.

terroristic tactics against the Israeli military and Israeli military families, infamously doing so repeatedly during Hizballah's fighting with Israel in 2006.

215. The January 8, 2020 Attack was an act of aircraft sabotage. The Attack involved the IRGC's firing of destructive missiles in close proximity to civil aircraft that interfered with the operation of air navigation facilities and was likely to endanger the safety of aircraft in flight. In recognition of the danger the Attack posed to civil aircraft, the Federal Aviation Association issued an emergency Notice to Airmen (NOTAM) that day warning of the "unacceptable inadvertent risk to U.S. civil aviation operations" associated with, *inter alia*, missiles launched by the IRGC in Tehran as part of the Attack.¹⁶⁴ The NOTAM warned that "these circumstances present an unacceptable risk to U.S. civil aviation due to the challenge of de-conflicting military activities with civil air traffic and the potential for miscalculation or misidentification," also warned of risk "to U.S. civil aviation operations" from "Iranian-fielded GPS jammers."¹⁶⁵

216. The January 8, 2020 Attack also involved the mobilization of Tehran-based surface-to-air missiles as a key part of the Attack to deter a U.S. counterstrike. Two such missiles fired by the IRGC as part of the Attack struck Ukraine International Airlines Flight 752, a Boeing 737 aircraft, killing 176 civilians. Iran initially *denied* any responsibility for the crash, with state media the next day characterizing it as "an American lie," "a wrongful scenario by CIA and the Pentagon," and "an attempt to prevent Boeing stock from a free fall."¹⁶⁶ The communication of this denial, which Iran knew was a lie, endangered the safety of aircraft in flight by minimizing the risks Iran's attacks posed to civilian aviation. In fact, the shooting down

¹⁶⁴ Fed. Aviation Admin., *Background Information Regarding U.S. Civil Aviation in the Tehran Flight Information Region (FIR) (OIIX)* (Feb. 7, 2020).

¹⁶⁵ *Id.*

¹⁶⁶ Quds Online, *Why American Media Must Save Boeing from Bankruptcy* (Jan. 11, 2020).

of Flight 752 as part of the Attack was itself an intentional and deliberated extrajudicial killing by Iran. As a Canadian court determined, “the missile attacks on Flight 752 were intentional,” they were an “act of terrorism” constituting “terrorist activity” under the terrorism exception to Canada’s sovereign immunity law, and Iran was liable for the deaths that it caused.¹⁶⁷

217. Iran aided the January 8, 2020 Attack by, *inter alia*, providing, through the IRGC, direct operational support to the attack teams, including intelligence from UAVs, satellite imagery, and human sources; IRGC-supplied, Hizballah-shipped, and IEI-manufactured weapons; UAVs and satellite imagery and weapons and communications systems; and by providing money and incentive payments, through the Terrorist Sponsors, to operatives from the IRGC, Hizballah, and JAM involved in the January 8, 2020 Attack. The United States has confirmed that Iran helped commit the January 8, 2020 Attack, including in public reports issued by State.¹⁶⁸ Moreover, Iran has publicly boasted about its responsibility for the January 8, 2020 Attack. On January 17, 2020, for example, Ayatollah Khamenei used the Friday sermon in Tehran—before thousands in person and millions via television, radio, and internet—to brag about Iran’s responsibility for the January 8, 2020 Attack, promise that other attacks targeting Americans would follow, and encourage the crowd’s repeated “Death to America” chants. Among other things: (1) Khamenei stated that the lethal strike against Qasem Soleimani 15 days prior displayed the U.S. government’s “terrorist nature”; and (2) Khamenei admitted that it was a “fact that Iran” had “give[n] such a slap to a world power”—*i.e.*, the January 8, 2020 Attack.

¹⁶⁷ *Zarei, et al. v. Islamic Republic of Iran, et al.*, CV-20-635078, at 12, Ont. Sup. Ct. J. (May 20, 2021); *see* U.S. Dep’t of State, *Country Reports on Terrorism 2021* at 195 (Feb. 2023).

¹⁶⁸ *See, e.g.*, U.S. Dep’t of State, *Outlaw Regime*, 2020 ed., at 12.

218. North Korea aided the January 8, 2020 Attack by, *inter alia*, providing training to Hizballah operatives involved in the January 8, 2020 Attack, as well as weapons and/or weapon components used in the January 8, 2020 Attack, including, but not limited to, *Qaim* missiles.

219. **Sergeant Jacob Deer** served in Iraq as a member of the U.S. Army at the time of the attack. SGT Deer was injured in the January 8, 2020 Attack. The Attack severely wounded SGT Deer, who suffered from a traumatic brain injury (“TBI”).

220. As a result of the January 8, 2020 Al Asad Air Base Attack and his injuries, SGT Deer has experienced severe physical and emotional pain and suffering.

221. Plaintiff SGT Deer was a U.S. national when attacked and remains so.

222. Plaintiff Samantha Deer is the wife of SGT Deer and a U.S. national.

223. Plaintiff J.A.D., by and through his next friend SGT Deer, is the minor son of SGT Deer. He is a U.S. national.

224. Plaintiff J.C.D., by and through his next friend SGT Deer, is the minor son of SGT Deer. He is a U.S. national.

225. As a result of the January 8, 2020 Attack and SGT Deer injuries, each member of the Deer Family has experienced severe mental anguish, emotional pain, and suffering.

226. **Private Second Class Brandon Godwin** served in Iraq as a member of the U.S. Army at the time of the attack. PV2 Godwin was injured in the January 8, 2020 Attack. The Attack severely wounded PV2 Godwin, who suffered from a TBI and a shoulder injury.

227. Plaintiff PV2 Godwin was a U.S. national when attacked and remains so.

228. As a result of the January 8, 2020 Attack and his injuries, PV2 Godwin has experienced severe mental anguish, emotional pain, and suffering.

229. **Private First Class Byron Hogan** served in Iraq as a member of the U.S. Army at the time of the attack. PFC Hogan was injured in the January 8, 2020 Attack. The Attack severely wounded PFC Hogan, who suffered from a TBI.

230. Plaintiff PFC Hogan was a U.S. national when attacked and remains so.

231. As a result of the January 8, 2020 Attack and his injuries, PFC Hogan has experienced severe mental anguish, emotional pain, and suffering.

232. **Staff Sergeant Torrin Mcdougale** served in Iraq as a member of the U.S. Army at the time of the attack. SSG Mcdougale was injured in the January 8, 2020 Attack. The Attack severely wounded SSG Mcdougale, who suffered from a TBI.

233. Plaintiff SSG Mcdougale was a U.S. national when attacked and remains so.

234. As a result of the January 8, 2020 Attack and his injuries, SSG Mcdougale has experienced severe mental anguish, emotional pain, and suffering.

235. **Specialist Ryan Nolan** served in Iraq as a member of the U.S. Army at the time of the attack. SPC Nolan was injured in the January 8, 2020 Attack. The Attack severely wounded SPC Nolan who suffered from a TBI and a lower back injury.

236. Plaintiff SPC Nolan was a U.S. national when attacked and remains so.

237. As a result of the January 8, 2020 Attack and his injuries, SPC Nolan has experienced severe mental anguish, emotional pain, and suffering.

238. **Sergeant Rodney Ragin** served in Iraq as a member of the U.S. Army at the time of the attack. SGT Ragin was injured in the January 8, 2020 Attack. The Attack severely wounded SGT Ragin, who suffered from a TBI with symptoms including headaches, dizziness, nausea, sensitivity to light, difficulty sleeping, and trouble concentrating.

239. Plaintiff SGT Ragin was a U.S. national when attacked and remains so.

240. As a result of the January 8, 2020 Attack and his injuries, SGT Ragin has experienced severe mental anguish, emotional pain, and suffering.

241. **Staff Sergeant Jacob Schmidt** served in Iraq as a member of the U.S. Army at the time of the attack. SSG Schmidt was injured in the January 8, 2020 Attack. The Attack severely wounded SSG Schmidt, who suffered from a TBI.

242. Plaintiff SSG Schmidt was a U.S. national when attacked and remains so.

243. As a result of the January 8, 2020 Attack and his injuries, SSG Schmidt has experienced severe mental anguish, emotional pain, and suffering.

244. **Private First Class Collin Shepard** served in Iraq as a member of the U.S. Army at the time of the attack. PFC Shepard was injured in the January 8, 2020 Attack. The Attack severely wounded PFC Shepard, who suffered from a TBI and anxiety.

245. As a result of the January 8, 2020 Al Asad Air Base Attack and his injuries, PFC Shepard has experienced severe physical and emotional pain and suffering.

246. Plaintiff PFC Shepard was a U.S. national when attacked and remains so.

247. Plaintiff Kaitlin Shepard is the wife of PFC Shepard and a U.S. national.

248. As a result of the January 8, 2020 Attack and PFC Shepard injuries, each member of the Shepard Family has experienced severe mental anguish, emotional pain, and suffering.

249. **Hugh Spears Jr.** was in Iraq as a civilian contractor working for KBR during the January 8, 2020 Attack. Hugh Spears was injured in the January 8, 2020 Attack. The Attack severely wounded Hugh Spears, who suffered from an existing lower back injury which was exacerbated by the attack and is now medicated for severe PTSD which includes sleep issues, anxiety, and flashbacks.

250. As a result of the January 8, 2020 Attack, Hugh Spears has experienced severe physical and emotional pain and suffering.

251. Plaintiff Hugh Spears was a U.S. national when attacked and remains so.

252. Plaintiff Brandon Spears is the son of Hugh Spears and a U.S. national.

253. As a result of the January 8, 2020 Attack and Hugh Spears's injuries, the Plaintiff members of the Spears Family have experienced severe mental anguish and emotional pain and suffering.

D. The March 11, 2020 Rocket and UAV Attack in Iraq (Covarrubias Family)

254. On March 11, 2020, a joint cell comprised of Hizballah and JAM (including Kataib Hizballah), funded, armed, and logistically supported by the Terrorist Sponsors, and acting as an agent of Iran, committed a rocket and UAV attack on Camp Taji in Baghdad, Iraq (the "March 11, 2020 Attack"). The March 11, 2020 Attack constituted an extrajudicial killing. It was planned and authorized by Hizballah, Kataib Hizballah, and the IRGC, including Hizballah Secretary General Hassan Nasrallah, senior Hizballah Iraq-operations leaders Mohammad Kawtharani and Yusuf Hashim, IRGC-QF Commander Esmail Qaani, and IRGC-IO Commander Hossein Taeb—each of whom acting as an agent for Iran and through the Khamenei Cell.

255. Iran aided the March 11, 2020 Attack by, *inter alia*, providing, through the SLO and IRGC (including IRGC-QF and IRGC-IO), direct support to the attack teams, including intelligence, IRGC-made rockets, rocket launchers, artillery computer systems, optics, UAVs, and satellite imagery; and by providing money and incentive payments, through the Terrorist Sponsors, to operatives from the IRGC, Hizballah, and JAM involved in the Attack. The United

States has confirmed that Iran supplied vital aid to the Attack, including in State reports to Congress,¹⁶⁹ DoD official media,¹⁷⁰ and its *Counterterrorism Guide*.¹⁷¹

256. North Korea aided the March 11, 2020 Attack by, *inter alia*, providing training to Hizballah operatives involved in the Attack, as well as weapons and/or weapon components used in the Attack.

257. **Specialist Juan Covarrubias** served in Iraq as a member of the U.S. Army at the time of the March 11, 2020 Attack. SPC Covarrubias was injured in the Attack. He died on March 11, 2020, as a result of injuries that he sustained during the Attack.

258. SPC Covarrubias was a U.S. national at the time of the Attack and his death.

259. Plaintiff Bianca Meza-Covarrubias is the widow of SPC Covarrubias and a U.S. national.

260. Plaintiff Alfredo Covarrubias is the father of SPC Covarrubias and a U.S. national.

261. Plaintiff Karen Covarrubias is the sister of SPC Covarrubias and a U.S. national.

262. As a result of the March 11, 2020 Attack and SPC Covarrubias's injuries and death, each member of the Covarrubias Family has experienced severe mental anguish, emotional pain and suffering, and the loss of his society, companionship, and counsel.

263. As a result of the March 11, 2020 Attack, SPC Covarrubias was injured in his person and/or property. The Plaintiff members of the Covarrubias Family are the survivors and/or heirs of SPC Covarrubias and are entitled to recover for the damages that he sustained.

¹⁶⁹ See, e.g., U.S. Dep't of State, *Country Reports on Terrorism 2021* at 299 (Feb. 2023).

¹⁷⁰ C. Todd Lopez, *U.S. Strikes 5 Kata'ib Hezbollah Targets in Iraq*, U.S. Dep't of Def. (Mar. 13, 2020).

¹⁷¹ U.S. Off. of the Dir. of Nat'l Intel., Nat'l Counterterrorism Ctr., *Counterterrorism Guide: Kata'ib Hezbollah* (2022).

E. The November 7, 2022 Attack in Iraq (Troell Family)

264. On November 7, 2022 a joint cell comprised of Hizballah and JAM (including Kataib Hizballah), funded, armed, and logistically supported by the Terrorist Sponsors, and acting as an agent of Iran, committed a targeted killing of a perceived enemy of the Iranian regime involving small arms in Baghdad, Iraq (the “November 7, 2022 Attack”). The November 7, 2022 Attack constituted an extrajudicial killing. The November 7, 2022 Attack was planned and authorized by Hizballah, acting as an agent of Iran.

265. Iran aided the Attack by, *inter alia*, providing money and incentive payments, through the Terrorist Sponsors, to operatives from the IRGC, Hizballah, and JAM involved in the Attack, and by providing the weapons and intelligence used for the Attack. The United States has confirmed that Iran supplied vital aid to the November 7, 2022 Attack, including in sworn filings by the U.S. Department of Justice that were later unsealed.¹⁷²

266. North Korea aided the November 7, 2022 Attack by, *inter alia*, providing training to Hizballah operatives involved in the Attack, as well as weapons and/or weapon components used in the Attack.

267. **Stephen Troell** was in Iraq as a civilian driving home on November 7, 2022 when the terrorists murdered him. Stephen Troell was injured in the November 7, 2022 Attack. He died on November 7, 2022, as a result of injuries that he sustained during the Attack.

268. Stephen Troell was a U.S. national at the time of the Attack and his death.

269. Plaintiff Jocelyn Troell is the widow of Stephen Troell and a U.S. national.

270. Plaintiff Abigail Troell is the daughter of Stephen Troell and a U.S. national.

¹⁷² *United States v. Mohammad Reza Nouri*, No. 23 MAG 5824, at ¶ 9 (S.D.N.Y. Aug. 1, 2023), <https://www.justice.gov/usao-sdny/media/1381856/dl>.

271. Plaintiff A.T., by and through her next friend Jocelyn Troell, is the minor daughter of Stephen Troell. She is a U.S. national.

272. Plaintiff Katelyn Troell is the daughter of Stephen Troell and a U.S. national.

273. Plaintiff S.T., by and through his next friend Jocelyn Troell, is the minor son of Stephen Troell. He is a U.S. national.

274. Plaintiff Susan Troell is the mother of Stephen Troell and a U.S. national.

275. Plaintiff Richard Troell is the father of Stephen Troell and a U.S. national.

276. Plaintiff Sarah Sellew is the sister of Stephen Troell and a U.S. national.

277. Plaintiff Christina Troell is the sister of Stephen Troell and a U.S. national.

278. Plaintiff Joanna Winn is the sister of Stephen Troell and a U.S. national.

279. As a result of the November 7, 2022 Attack and Stephen Troell's injuries and death, each member of the Troell Family has experienced severe mental anguish, emotional pain and suffering, and the loss of his society, companionship, and counsel.

280. As a result of the November 7, 2022 Attack, Stephen Troell was injured in his person and/or property. The Plaintiff members of the Troell Family are the survivors and/or heirs of Stephen Troell and are entitled to recover for the damages that he sustained.

F. The March 23, 2023 UAV Attack in Syria (Dubis Family)

281. On March 23, 2023, a joint cell comprised of Hizballah and JAM (including Kataib Hizballah) in Iraq and the IRGC in Iran—funded, armed, and logistically supported by the Terrorist Sponsors and acting as an agent of Iran—committed a UAV attack in Syria (the “March 23, 2023 Attack”). The March 23, 2023 Attack constituted an extrajudicial killing.

282. Iran aided the March 23, 2023 Attack by, *inter alia*, providing, through the SLO and IRGC (including IRGC-QF and IRGC-IO), direct operational support to the attack teams, including intelligence, IRGC-made rockets, rocket launchers, artillery computer systems, optics,

UAVs, and satellite imagery; and by providing money and incentive payments, through the Terrorist Sponsors, to operatives from the IRGC, Hizballah, and JAM (including Kataib Hizballah) involved in the March 23, 2023 Attack. The United States has confirmed that Iran supplied vital aid to the March 23, 2023 Attack, including in State reports to Congress.¹⁷³

283. North Korea aided the March 23, 2023 Attack by, *inter alia*, providing training to Hizballah operatives involved in the March 23, 2023 Attack, as well as weapons and/or weapon components used in the March 23, 2023 Attack.

284. **Scott Dubis** was in Syria as a civilian contractor working for the U.S. Air Force at the time of the attack. Scott Dubis was injured in the March 23, 2023 Attack. He died on March 23, 2023, as a result of injuries that he sustained during the Attack.

285. Scott Dubis was a U.S. national at the time of the Attack and his death.

286. Plaintiff Shay Dubis is the widow of Scott Dubis and a U.S. national.

287. As a result of the March 23, 2023 Attack and Scott Dubis's injuries and death, each member of the Dubis Family has experienced severe mental anguish, emotional pain and suffering, and the loss of his society, companionship, and counsel.

288. As a result of the March 23, 2023 Attack, Scott Dubis was injured in his person and/or property. The Plaintiff members of the Dubis Family are the survivors and/or heirs of Scott Dubis and are entitled to recover for the damages that he sustained.

G. The October 7, 2023 Complex Attack in Israel (Brauner Family)

289. On October 7, 2023, Hamas and PIJ jointly committed a complex multi-front mass terrorist attack targeting dozens of sites in Israel (the "October 7 Attack"). The October 7 Attack was a single, integrated, complex attack for which the various components of the attack

¹⁷³ See, e.g., U.S. Dep't of State, *Country Reports on Terrorism 2023* at "Iran" (Dec. 2024).

were specifically intended to, and did in fact, complement the other components. The October 7 Attack constituted an extrajudicial killing.

290. Iran aided the October 7 Attack by, *inter alia*, providing funds, weapons, recruitment assistance, and incentive payments, through the Terrorist Sponsors, to operatives from Hizballah, Hamas, and PIJ involved in the Attack. The United States has confirmed that Iran supplied vital aid to the October 7 Attack, including in State reports to Congress,¹⁷⁴ and sanctions designations imposed within weeks of the attack.¹⁷⁵ Moreover, uncovered documents confirmed that the IRGC, Hizballah, and Khamenei Cell, working with Hamas leadership, provided key support to the October 7 Attack. For example, a December 2022 memorandum among Hamas leaders, including Yahya Sinwar, corroborated the IRGC's and Hizballah's support for the Attack. The memorandum emphasized the need “to visit the Brothers in the Hezb [*i.e.*, Hizballah] and the Iranian state, in order to convey a clear message on the future of the joint activities against the Zionist occupation” and explained that “in the context of this strategic overview and direction,”—*i.e.*, such as the forthcoming Attack—“the basic principle is that we agree with our Brothers in Iran that financial support of at least 7 million per month will be approved, over the course of the year, in order to mobilize and prepare for these types of confrontations comfortably.”

291. North Korea aided the October 7 Attack by, *inter alia*, providing training to Hizballah, Hamas, and PIJ operatives involved in the Attack, as well as weapons and/or weapon components (including RPGs) and tunnel-building assistance for it.

¹⁷⁴ See, e.g., U.S. Dep't of State, *Country Reports on Terrorism 2023* at “Iran” (Dec. 2024).

¹⁷⁵ See, e.g., U.S. Dep't of the Treas., *Treasury Targets Additional Sources of Support and Financing to Hamas* (Oct. 27, 2023).

292. **Bernadette Brauner** was in Israel as a civilian visiting family during the October 7 Attack. The Attack severely wounded Bernadette Brauner, who suffered from severe PTSD, often having flashbacks of being in a sweltering bomb shelter for over 20 hours.

293. As a result of the October 7 Attack and her injuries, Bernadette Brauner has experienced severe physical and emotional pain and suffering.

294. Plaintiff Bernadette Brauner was a U.S. national when attacked and remains so.

295. Plaintiff Nir Brauner is the husband of Bernadette Brauner and a U.S. national.

296. As a result of the October 7 Attack and Bernadette Brauner's injuries, the Plaintiff members of the Brauner family have experienced severe mental anguish as well as emotional pain and suffering.

297. **Nir Brauner** was in Israel as a civilian visiting his family during the October 7 Attack. The Attack severely wounded Nir Brauner, who suffered from severe PTSD, often having flashbacks of being in a sweltering bomb shelter for over 20 hours.

298. As a result of the October 7 Attack and his injuries, Nir Brauner has experienced severe physical and emotional pain and suffering.

299. Plaintiff Nir Brauner was a U.S. national when attacked and remains so.

300. Plaintiff Bernadette Brauner is the wife of Nir Brauner and a U.S. national.

301. As a result of the October 7 Attack and Nir Brauner's injuries, the Plaintiff members of the Brauner family have experienced severe mental anguish as well as emotional pain and suffering.

CLAIM FOR RELIEF

PERSONAL INJURY OR DEATH UNDER 28 U.S.C. § 1605A(c)

302. Plaintiffs incorporate all allegations in this Complaint.

303. Plaintiffs suffered personal injury or death caused by terrorist acts of torture, extrajudicial killing, aircraft sabotage, hostage taking, or the provision of material support or resources for such acts, and such acts or provision of material support or resources were committed by officials, employees, or agents of Iran and North Korea while acting within the scope of their office, employment, or agency.

304. The terrorist acts that killed or injured Plaintiffs occurred in Iraq, Syria, Israel, and/or Kenya.

305. Iran was designated as a State Sponsor of Terrorism at the time the terrorist acts that killed or injured Plaintiffs, or the provision of material support or resources for such acts, occurred. Iran remains designated as a State Sponsor of Terrorism today.

306. North Korea was designated as a State Sponsor of Terrorism at the time of the terrorist acts that killed or injured Plaintiffs, or the provision of material support or resources for such acts, occurred. North Korea remains designated as a State Sponsor of Terrorism today.

307. At the time of the attacks from which Plaintiffs were killed or injured, Plaintiffs were U.S. nationals, members of the U.S. armed forces, and/or employees or contractors of the U.S. government acting within the scope of their employment.

308. Plaintiffs are currently U.S. nationals, members of the U.S. armed forces, employees or contractors of the United States government acting within the scope of their employment, or the legal representatives of one of the foregoing.

309. Iran's conduct was criminal, outrageous, extreme, wanton, willful, malicious, and a threat to the public, warranting an award of punitive damages against Iran pursuant to 28 U.S.C. § 1605A(c).

310. North Korea's conduct was criminal, outrageous, extreme, wanton, willful, malicious, and a threat to the public, warranting an award of punitive damages against Iran pursuant to 28 U.S.C. § 1605A(c).

311. As a result of Defendant Iran's and Defendant North Korea's liability under 28 U.S.C. § 1605A(c), Plaintiffs are entitled to recover compensatory damages, including, but not limited to, damages for their severe physical injuries, extreme mental anguish, pain and suffering, economic damages, and solatium damages, as well as punitive damages as determined by the trier of fact.

PRAYER FOR RELIEF

312. Plaintiffs request that the Court:

313. Enter judgment against Iran and North Korea, finding each liable under 28 U.S.C. § 1605A(c);

314. Award Plaintiffs compensatory and punitive damages to the maximum extent permitted by law, 28 U.S.C. § 1605A(c), including but not limited to pain and suffering, economic damages, and solatium damages;

315. Award Plaintiffs prejudgment interest;

316. Award Plaintiffs costs, expenses, and attorneys' fees; and

317. Award Plaintiffs any such further relief the Court deems just and proper.

Respectfully submitted,

/s/ Charles B. Molster, III

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