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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

Case: **5:26-cr-20306**
Assigned To : **Levy, Judith E.**
Referral Judge: **Stafford, Elizabeth A.**
Assign. Date : **5/20/2026**
Description: **USA v. Sealed (jo)**

UNITED STATES OF AMERICA,

v.

D-1 ZAINAB ALIASGAR HAKIM (a/k/a "Z")
D-2 AMATULLAH ALIASGAR HAKIM (a/k/a "A")
D-3 PAIGE ELIZABETH FEYOCK
D-4 AHMET KEREM KORKAYA (a/k/a "Met")
D-5 JONATHAN HONGRU ZOU
D-6 ALEXANDER MATTHEW SEPULVEDA
D-7 MARIAM MUHAMMED ODEH
D-8 COLIN HUNTER WEGER (a/k/a "Beams")

Defendants.

Violations:
18 U.S.C. §§ 371; 875(c) (*Conspiracy to Transmit a Threat)*
18 U.S.C. §§ 1512(b)(3); (k) (*Conspiracy to Tamper with a Witness)*
18 U.S.C. § 2232(a) (*Destruction of Property to Prevent Seizure)*

INDICTMENT

THE GRAND JURY CHARGES:

INTRODUCTION

The defendants are a group of individuals associated with the University of Michigan in Ann Arbor. After the October 7, 2023, Hamas terrorist attacks on Israel, the defendants and unindicted conspirators orchestrated detailed plans to threaten University of Michigan leaders, law enforcement, and businesses with coordinated

criminal acts. Their goal included forcing the University of Michigan and other businesses to sever all perceived ties with the State of Israel.

To accomplish this goal, the defendants and their unindicted conspirators, in the Eastern District of Michigan and elsewhere, used encrypted messages, social media, and overseas collaboration platforms to research, target, and attack their victims. Then, they posted pictures of their attacks on social media, along with additional threats and warnings. Their criminal activity included spray painting threats, breaking windows, and throwing glass jars filled with noxious chemicals into family homes. They marked their victims with threatening symbols used by Hamas, including red inverted triangles and red handprints. They used the internet and social media to broadcast their message to ensure their threats and commitment to continuing criminal activity were heard by their victims and others who support Israel.

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. The University of Michigan, a public research university, was founded in 1817. At all times relevant to this Indictment, its main campus, located in Ann Arbor, Michigan, had a total enrollment exceeding 50,000, including graduate and professional students.

2. The University of Michigan is governed by a Board of Regents, which consists of eight members elected at large in biennial state-wide elections. The University President serves as an *ex officio* member. According to the Michigan Constitution of 1963, the Regents maintain "general supervision" of the University and "the control and direction of all expenditures from the institution's funds."

3. At all times relevant to this Indictment, the defendants, D-1 ZAINAB ALIASGAR HAKIM, D-2 AMATULLAH ALIASGAR HAKIM, D-3 PAIGE ELIZABETH FEYOCK, D-5 JONATHAN HONGRU ZOU, D-6 ALEXANDER MATTHEW SEPULVEDA, D-7 MARIAM MUHAMMED ODEH, D-8 COLIN HUNTER WEGER, and other unindicted conspirators lived, worked, and/or attended school in the Eastern District of Michigan. D-4 AHMET KEREM KORKAYA moved to Wisconsin in 2024 but traveled back to the Eastern District of Michigan on multiple occasions to plan and participate in various actions.

4. On October 7, 2023, Hamas[1] terrorists and armed Palestinian militants from other terrorist organizations in the Gaza Strip invaded Israel by land, sea, and

[1] On October 8, 1997, the United States Secretary of State designated Hamas as a Foreign Terrorist Organization (FTO) under Section 219 of the Immigration and Nationality Act. On October 31, 2001, the Secretary of State also designated Hamas as a Specially Designated Global Terrorist under Executive Order 13224. The Secretary of State has also listed the following aliases for Hamas: Islamic Resistance Movement, Harakat al Muqawama al-Islamiya, Students of Ayyash,

air. They infiltrated more than twenty Israeli communities and the Nova Music Festival. They raped, mutilated, and burned men, women, and children. They murdered an estimated 1,200 men, women, and children, including over forty Americans. The terrorists and militants took 253 Israeli and foreign citizens as hostages, including twelve Americans.

5. After October 7, 2023, college campuses across the country, including at the University of Michigan, had increased protests and other First Amendment protected activities concerning the Hamas attacks and Israel's response. There was also an increased support for Hamas on college campuses, including at the University of Michigan in Ann Arbor. This included the use of Hamas symbols such as the inverted red triangle (used in Hamas military videos to mark targets for death), bloody handprints (symbolizing the Ramallah Lynching of 2000, which was the murder of two Israeli military reservists during the Second Intifada), and phrases/chants such as, "from the river to the sea," "long live the intifada," and "glory to our martyrs."

6. After October 7, 2023, the defendants and unindicted conspirators organized and planned their responses to the University of Michigan's perceived

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Students of the Engineer, Yahya Ayyash Units, Izz Al-Din Al-Qassim Brigades, Izz Al-Din Al-Qassim Forces, Izz Al-Din Al Qassim Battalions, Izz al-Din Al Qassam Brigades, Izz al-Din Al Qassam Forces, and Izz al-Din Al Qassam Battalions. To date, Hamas remains a designated FTO.

financial support of Israel—enacting a series of coordinated "actions" threatening University of Michigan leaders, law enforcement, and businesses. The conspirators insisted publicly that they "must escalate, mobilize, and organize to demand divestment by any means necessary."

7. The defendants and unindicted conspirators coordinated and planned their criminal activity, targeting selected victims using encrypted online group chats, websites, "teach ins" (seminars designed to encourage action), and other meetings. They also initiated an online campaign against their targets by using social media platforms (Twitter/X and Instagram) that were, at times, connected to student groups at the University of Michigan, including the former Students Allied for Freedom and Equality (SAFE) (University of Michigan's chapter of "Justice in Palestine") and the TAHRIR Coalition.

8. On or about October 20, 2023, the defendants and unindicted conspirators publicly posted a list of demands on social media directed at University of Michigan leadership. Among other demands, they required the University to make a "full and complete divestment" from the State of Israel and any business supporting the State of Israel. Unsatisfied by the University's response, the defendants and unindicted conspirators "prepared to take action" against the leadership by what they called "autonomous actions." Some of those "autonomous actions" included, but were not limited to, forcibly

entering and occupying University of Michigan buildings, defacing buildings, and blocking and disrupting events on campus. The defendants and their unindicted conspirators also posted threats on the internet that included photos of their "autonomous actions."

9. After October 7, 2023, the defendants utilized social media and internet platforms to spread their demands to their targets as well as to a broader audience by using internet websites such as "Unity of Fields" (a/k/a "Pal Action") and "Unsalted Counter Info." The specific handles used on Twitter/X and Instagram included: @safeumich; @safexmich; @tahrirumich; @tahrirxmich; @jvpumich; @pal_action; @pal_actionus; @unsaltedinfo; @unityoffields.

10. Their online demands included the following:

    a. On or about October 16, 2023, @safeumich posted a statement regarding the "developing massacre in Gaza and inadequate University response," calling upon University of Michigan leadership and the campus community to "urge for divestment from companies directly aiding the occupation of Palestinians . . . ."

    b. On or about October 20, 2023, @safeumich presented a list of "demands" to University of Michigan leadership, including total divestment from Israel, conducting campus-wide investigations, and

issuing a formal statement that "clearly defines the massacre in Gaza as a genocidal ethnic cleansing campaign led by Israel, and aided by the United States."

c. On or about November 12, 2023, when the University of Michigan emailed its refusal, @safeumich posted: "IMPORTANT: Be prepared to take action as we demand nothing short of full and complete divestment as well as proper recognition and structural support from this school!! $_{ps}$"

d. On or about February 13, 2024, @tahrirmich posted red-tinted faces of University of Michigan Regents with the headline: "U-M REGENTS HAVE BLOOD ON THEIR HANDS. DIVEST NOW."

e. On or about March 6, 2024, @safeumich posted an invitation for a "die-in . . . to honor our 30,000+ martyrs and to remember Aaron Bushnell" (an American soldier who committed suicide in front of the Israeli embassy by lighting himself on fire in protest).

f. On or about March 31, 2024, @tahrirumich posted a video of people disrupting and blocking access inside a University of Michigan building while waving Palestinian flags. The video's caption: "WE WILL NOT STOP" "WE WILL NOT REST."

11. On or about May 2024, the defendants and unindicted conspirators participated in a "Gaza Solidarity Encampment" at the University of Michigan. Local police documented twenty-six criminal incidents directly related to the encampment. During the encampment, the defendants and unindicted conspirators used the internet to warn their opposition that "we look to our martyrs and freedom fighters for guidance . . . the student intifada will never be silenced." The defendants aspired to achieve the acclaim of the 1960s domestic terrorist organization "Weather Underground."

12. When the University shut down the encampment, the defendants and unindicted conspirators turned to individual targets for their criminal "autonomous actions."

13. The defendants and unindicted conspirators held meetings where they collaborated to identify various specific targets of their "autonomous actions." The targets included University of Michigan leadership, businesses, and anyone they believed supported—directly or indirectly—the State of Israel. The defendants and unindicted conspirators used the internet to research personal addresses, photographs, political and social connections, business ownership, and other personal details. They performed surveillance on their targets and counter-surveillance on law enforcement. They discussed methods by which to harm their targets and their families, including poison, bombs,

and psychological torture. For example, on or about May 21, 2024, D-3 PAIGE ELIZABETH FEYOCK and D-4 AHMET KEREM KORKAYA (a medical student at the time) exchanged the following messages in which they agreed to "kill," "torment," and "terrorize" their targets:

KORKAYA: we are finding [V-4]'s address if we don't have it already [so I can] drive my car into it.

KORKAYA: [V-4]'s entire family is now on my hit list.

FEYOCK: Let's get [V-4's] kids bruh / and [V-2's] too.

KORKAYA: wallah [by God] paige i wanna do something / the only way to clear my conscious [sic].

KORKAYA: wallah [by God] I'm gonna be the dirtiest fucking doctor ever / I'm gonna be [V-1]'s doctor /poison her ass slowly.

FEYOCK: (*agreeing*) We need people following [V-1]/ get into that house then burn it down.

14. From approximately October 2023 through and including April 2025, the defendants and unindicted conspirators targeted individuals and businesses in the Eastern District of Michigan and elsewhere, including: The University of Michigan's President, Chief Investment Officer, Provost, and members of the Board of Regents and their businesses; a University of Michigan police officer; Rolls Royce Solutions America, Inc.; Maersk, Inc.; and the Jewish Federation of Metropolitan Detroit.

15. The defendants and unindicted conspirators recruited participants to engage with them in their "autonomous actions." Their planning efforts included purchasing supplies, meeting to coordinate and distribute supplies, mapping routes, performing surveillance, and using internet-based collaboration tools to draft threats to their targets.

16. As part of the conspiracy, the defendants and unindicted conspirators traveled at night to the targeted homes and businesses. They damaged and defaced homes and businesses with spray painted messages, threats, and symbols, including inverted triangles, red handprints, and phrases such as "INTIFADA" and "DIVEST NOW." The defendants and unindicted conspirators also left demand notes containing additional threats, caulked doors shut, bike-locked entryways, broke windows, and threw glass jars filled with butyric acid and dye into the targeted homes.

17. The defendants and unindicted conspirators took photographs of the destruction and posted the photos online with "official statements" and additional warnings and threats such as "you cannot hide" and "we only come back stronger."

COUNT ONE

18 U.S.C. §§ 371; 875(c)

(Conspiracy to Transmit Threats in Interstate and Foreign Commerce)

D-2 AMATULLAH ALIASGAR HAKIM
D-6 ALEXANDER MATTHEW SEPULVEDA

18. The Grand Jury incorporates by reference the "General Allegations" above as if they were set forth in full herein.

19. At all times relevant to this Indictment, Victim One (V-1), whose identity is known to the Grand Jury, served as a member of the Board of Regents at the University of Michigan in Ann Arbor, Michigan.

20. Starting on or about October 2023, and continuing through approximately May 17, 2024, in the Eastern District of Michigan, and elsewhere, the defendants, D-2 AMATULLAH ALIASGAR HAKIM, D-6 ALEXANDER MATTHEW SEPULVEDA, and others, known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree with each other to commit the offense of transmitting threats in interstate and foreign commerce, in violation of Title 18, United States Code, Section 875(c), by knowingly sending a message in interstate and foreign commerce containing a true threat to injure the person of another.

MANNER AND MEANS

21. It was part of the conspiracy that the defendants and unindicted conspirators devised a plan to transmit true threats to V-1 in interstate and foreign commerce by trespassing and vandalizing V-1's personal property, taking pictures of the damage, and using the internet to transmit true threats directed at V-1 and others complicit in supporting Israel.

OVERT ACTS

22. In furtherance of the conspiracy, and to achieve the objects thereof, the defendants, and others known and unknown to the Grand Jury, committed and caused to be committed, in the Eastern District of Michigan and elsewhere, the following overt acts, among others:

a. On or about April 7, 2024, through on or about April 18, 2024, D-2 AMATULLAH ALIASGAR HAKIM, D-3 PAIGE ELIZABETH FEYOCK, Unindicted Co-conspirator One (UCC-1), and others used CryptPad.fr to create a meeting agenda that included "targeting the Board of Regents." The plan called for "[m]ore deep-diving on all of regents." Under "House visits," the notes warned: "Be cautious about timing – middle of the night might appear more threatening."

b. On or about May 15, 2024, at approximately 5:53 a.m., conspirators and others trespassed on [V-1's] house in the Western District of

Michigan. They littered the yard and porch with small tents, sheets wrapped to look like dead bodies, dismembered and bloody baby dolls, and a broken crib. They taped a demand note to the front door ordering, among other things, that the University of Michigan divest from Israel.

c. On or about May 15, 2024, shortly after police arrived at V-1's house, @safeumich, @jvpumich and @tahrirumich posted a video of the trespass with this message:

> GOOD MORNING, @[V-1]. This morning, on the 76th anniversary of the Nakba, students hand delivered our demands to Regent [V-1]. About 2 weeks ago, she laughed at students demanding divestment while she attended a party next door to our encampment. Regent [V-1], we will hold you accountable for the 35,000+ Palestinians martyrs whose death you funded and profited from. No matter how many times you call on violent cops to brutalize students, cancel and move your meetings to hide from students, and refuse to admit this university's and YOUR complicity in genocide, we will continue to protest. You cannot hide. We demand divestment and will remain relentless in the struggle for a free Palestine.

d. On or about May 15, 2024, later in the day, @safeumich posted:

> @[V-1] There's nothing funny about genocide. This morning, the UMich Gaza Solidarity Encampment delivered our demands to Regent [V-1's] door, the same regent who laughed in our faces as we told her, "[V-1, V-1] you can't hide, you are funding genocide." Since this morning, she has reiterated REFUSAL to divest on X. SHAME! We have communicated that the regents must respond to our demands with an open bargaining meeting for divestment by the end of their board meeting TOMORROW! . . . [V-1], if you aren't losing sleep after funding mass murder and genocide, then WE WILL WAKE YOU UP!

e. On or about May 17, 2024, Unsalted Counter Info's website cross-

posted a photo and story: "University of Michigan Regents Terrified of Students, Home Demos."

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

18 U.S.C. §§ 371; 875(c)

(Conspiracy to Transmit Threats in Interstate and Foreign Commerce)

D-1 ZAINAB ALIASGAR HAKIM
D-2 AMATULLAH ALIASGAR HAKIM
D-3 PAIGE ELIZABETH FEYOCK
D-6 ALEXANDER MATTHEW SEPULVEDA

23. The Grand Jury incorporates by the "General Allegations" above as if they were set forth in full herein.

24. At all times relevant to this Indictment, Victim Two (V-2), whose identity is known to the Grand Jury, served as a member of the Board of Regents at the University of Michigan in Ann Arbor, Michigan.

25. At all times relevant to this Indictment, V-2 held a position as equity partner for a law firm located in the Eastern District of Michigan.

26. Starting on or about October 2023, and continuing through approximately June 6, 2024, in the Eastern District of Michigan, and elsewhere, the defendants D-1 ZAINAB ALIASGAR HAKIM, D-2 AMATULLAH ALIASGAR HAKIM, D-3 PAIGE ELIZABETH FEYOCK, D-6

ALEXANDER MATTHEW SEPULVEDA, and others, known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree with each other to commit the offense of transmitting threats in interstate and foreign commerce, in violation of Title 18, United States Code, Section 875(c), by knowingly sending a message in interstate and foreign commerce containing a true threat to injure the person of another.

MANNER AND MEANS

27. It was part of the conspiracy that the defendants and unindicted conspirators devised a plan to transmit true threats to V-2 in interstate and foreign commerce by trespassing and vandalizing V-2's business property, taking pictures of the damage, and using the internet to transmit true threats directed at V-2 and others complicit in supporting Israel.

OVERT ACTS

28. In furtherance of the conspiracy, and to achieve the objects thereof, the defendants, and others known and unknown to the Grand Jury, committed and caused to be committed, in the Eastern District of Michigan and elsewhere, the following overt acts, among others:

a. On or about May 15, 2024, in the early morning hours, assisted by Unindicted Co-conspirator Two (UCC-2), D-6 ALEXANDER MATTHEW SEPULVEDA walked up to V-2's house in the Eastern

District of Michigan and taped a note on his door titled: "Demands of the UMich Gaza Solidarity Encampment." The note stated: "We are giving the Regents until the end of their meeting on May 16th to respond to our communication . . . we expect a full agreement to our preconditions. . . . "

b. On or about May 21, 2024, D-3 PAIGE ELIZABETH FEYOCK and D-4 AHMET KEREM KORKAYA exchanged messages that included a desire to "get" V-2's kids, referring to a "hit list" where people "gotta die."

c. On or about June 1-2, 2024, D-1 ZAINAB ALIASGAR HAKIM searched the internet for supplies, including water balloons and spray paint. She also searched for the weather forecast in the law firm's city.

d. On or about June 1, 2024, D-1 ZAINAB ALIASGAR HAKIM took a picture of D-2 AMATULLAH ALIASGAR HAKIM in their family garage showing D-2 AMATULLAH ALIASGAR HAKIM filling balloons with red paint and smiling at the camera while holding up her "bloody" hands.

e. On or about June 3, 2024, at approximately 1:38 a.m., D-1 ZAINAB ALIASGAR HAKIM, D-2 AMATULLAH ALIASGAR HAKIM, and other conspirators vandalized V-2's law firm in the Eastern District of

Michigan by throwing red paint balloons at the building and leaving imprinted red painted handprints on the windows. They spraypainted messages on the building and sidewalk:

DIVEST OR FUCK OFF

FREE PALESTINE

UM KILLS

FUCK YOU [V-2's last name]

DIVEST NOW

f. On or about June 3, 2024, D-2 AMATULLAH ALIASGAR HAKIM took a "selfie" with D-1 ZAINAB ALIASGAR HAKIM in front of the bathroom mirror with both wearing black hoodies, black face coverings, and dark hats. Both were covered in red paint splotches.

g. On or about June 3, 2024, D-1 ZAINAB ALIASGAR HAKIM told Unindicted Co-conspirator Three (UCC-3) that she and her "sister" participated in the "action" involving V-2's law firm.

h. On or about June 3, 2024, at approximately 11:14 p.m., @tahrirumich and @safeumich posted a multi-panel story featuring photos of the vandalism and photos of V-2. The caption of the story stated, "[V-2, V-2], you can't hide, you are funding genocide."

i. The @tahrirumich and @safeumich story also stated: "The autonomous group that graffitied Zionist Regent [V-2]'s law firm last night released the following message:

> In response to the ongoing destruction of Rafah and the continued strength of the Palestinian resistance, we beautified the front of the [V-2's law firm] last night. [V-2] is a violently Zionist regent at the University of Michigan, which has $6 billion invested in firms that fund the "israeli" regime.
>
> As Rafah burns, Regent [V-2] has mocked calls for divestment and ordered cops to pepper spray and brutalize protestors in an encampment raid. In response to protestors taping a note to his door, he said "There are lots of places in this country where showing up on someone's door in a menacing manner at that hour will get you shot." [V-2] and the other regents think they can shut us up with violent repression but we only come back stronger. Fuck the Zionist project and fuck the cops that protect it . . .
>
> . . . we must escalate, mobilize, and organize to demand divestment by any means necessary.

j. On or about June 3, 2024, D-1 ZAINAB ALIASGAR HAKIM searched online for "how to turn photo metadata off on iPhone" and "delete signal messages on mac," as well as "[V-2]" and news stories about the vandalism at the law firm.

k. On or about June 4, 2024, at approximately 11:15 p.m., after circulating the post to @safeumich, @jvpumich, and others, D-1 ZAINAB ALIASGAR HAKIM responded: "gods work fr [for real]."

l. On or about June 6, 2024, D-3 PAIGE ELIZABETH FEYOCK, Unindicted Co-Conspirators Four and Five (UCC-4, UCC-5), and others accessed a CryptPad.fr document that contained the "Statement on 06/03/2024 Regarding the Autonomous Action." The document included separate sections for official statements from @pal_action and @tahrir coalition.

All in violation of Title 18, United States Code, Section 371.

COUNT THREE

18 U.S.C. §§ 371; 875(c)

(Conspiracy to Transmit Threats in Interstate and Foreign Commerce)

D-1 ZAINAB ALIASGAR HAKIM
D-2 AMATULLAH ALIASGAR HAKIM
D-3 PAIGE ELIZABETH FEYOCK
D-4 AHMET KEREM KORKAYA
D-7 MARIAM MUHAMMED ODEH
D-8 COLIN HUNTER WEGER

29. The Grand Jury incorporates by reference the "General Allegations" above as if they were set forth in full herein.

30. At all times relevant to this Indictment, Rolls Royce Solutions America, Inc. (also known as MTU) was a company that created, delivered, and serviced a variety of engines across the world. It was headquartered in Germany, had a presence in Israel, and had locations in the Eastern District of Michigan.

31. Starting on or about October 2023, through on or about July 1, 2024, in the Eastern District of Michigan, and elsewhere, the defendants D-1 ZAINAB ALIASGAR HAKIM, D-2 AMATULLAH ALIASGAR HAKIM, D-3 PAIGE ELIZABETH FEYOCK, D-4 AHMET KEREM KORKAYA, D-7 MARIAM MUHAMMED ODEH, D-8 COLIN HUNTER WEGER, and others, known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree with each other to commit the offense of transmitting threats in interstate and foreign commerce, in violation of Title 18, United States Code, Section 875(c), by knowingly sending a message in interstate and foreign commerce containing a true threat to injure the person of another.

MANNER AND MEANS

32. It was part of the conspiracy that the defendants and unindicted conspirators devised a plan to transmit true threats to executives and employees of Rolls Royce Solutions America, Inc., in interstate and foreign commerce by trespassing and vandalizing their business property, taking pictures of the damage, and using the internet to transmit true threats directed at executives and employees of Rolls Royce Solutions America, Inc., and others complicit in supporting Israel.

OVERT ACTS

33. In furtherance of the conspiracy, and to achieve the objects thereof, the defendants, and others known and unknown to the Grand Jury, committed and caused to be committed, in the Eastern District of Michigan and elsewhere, the following overt acts, among others:

a. On or about June 27, 2024, D-1 ZAINAB ALIASGAR HAKIM messaged D-7 MARIAM MUHAMMED ODEH asking if she wanted "to do an action sat night/pls[please] lmk [let me know] asap/i need a scout."

b. On or about June 28, 2024, D-2 AMATULLAH ALIASGAR HAKIM and D-8 COLIN HUNTER WEGER discussed preparation for the action at Rolls Royce Solutions/MTU. D-2 AMATULLAH ALIASGAR HAKIM and D-8 COLIN HUNTER WEGER agreed to "go over the layout in person" with the group members so "we can all be looking at the same thing."

c. On or about June 29, 2024, D-3 PAIGE ELIZABETH FEYOCK searched for Rolls Royce Solutions and its address on Google maps; visited "Radio Scanner"; searched "state police district map"; and visited the website for Michigan State Police District 2.

d. On or about June 29, 2024, D-7 MARIAM MUHAMMED ODEH

messaged D-1 ZAINAB ALIASGAR HAKIM asking for her address because "ak" [D-4 AHMET KEREM KORKAYA] said to meet there. D-1 ZAINAB ALIASGAR HAKIM instructed her to "come by 11:30  ."

e. On or about June 29, 2024, UCC-5 sent a Signal message to D-1 ZAINAB ALIASGAR HAKIM and "C", an individual associated with Unity of Fields/Pal Action: "this is my comrade Zainab, she said she has some content for pal action."

f. On or about June 29, 2024, just before midnight, D-7 MIRIAM MUHAMMED ODEH messaged D-1 ZAINAB ALIASGAR HAKIM that she was "7 min away" and asked permission to park in the driveway, confirming that she was at D-1 ZAINAB ALIASGAR HAKIM's house.

g. On or about June 30, 2024, from approximately 2:00 a.m. to 2:40 a.m., D-1 ZAINAB ALIASGAR HAKIM, D-2 AMATULLAH ALIASGAR HAKIM, D-4 AHMET KEREM KORKAYA, D-7 MARIAM MUHAMMED ODEH, D-8 COLIN HUNTER WEGER, and other conspirators vandalized a Rolls Royce Solutions America, Inc., building in the Eastern District of Michigan by padlocking the doors, painting inverted red triangles on the building, pressing red painted

handprints on the windows, and throwing red paint ballons at the building's sign. They spraypainted messages on the sidewalk and building:

FREE PALESTINE

FUCK THE IOF

MTU ARMS GENOCIDE

FUCK RR and FUCK MTU

BLOOD ON YOUR HANDS

LONG LIVE THE INTIFADA

h. On or about June 30, 2024, at approximately 9:20 a.m., @pal_actionus and Unity of Fields posted pictures and a story about the action. The post concluded:

> As beneficiaries of this imperial system, our duty to Palestine is to damage, disrupt, and destroy the colonizers' operations by any means necessary. We call on revolutionaries across the world to take decisive, escalatory action to halt the war machine . . . Glory to our martyrs, power to our freedom fighters! Long live the Intifada!

All in violation of Title 18, United States Code, Section 371.

COUNT FOUR

18 U.S.C. §§ 371; 875(c)

(Conspiracy to Transmit Threats in Interstate and Foreign Commerce)

D-1 ZAINAB ALIASGAR HAKIM
D-2 AMATULLAH ALIASGAR HAKIM
D-8 COLIN HUNTER WEGER

34. The Grand Jury incorporates by reference the "General Allegations" above as if they were set forth in full herein.

35. At all times relevant to this Indictment, Maersk Shipping Company was an international company specializing in logistics, warehousing, and transport for business and supply chains. The company operated offices in Israel, among other foreign countries. Maersk Shipping Company also owned a warehousing and distribution center in the Eastern District of Michigan.

36. Starting on or about October 2023, through on or about July 10, 2024, in the Eastern District of Michigan, and elsewhere, the defendants D-1 ZAINAB ALIASGAR HAKIM, D-2 AMATULLAH ALIASGAR HAKIM, D-8 COLIN HUNTER WEGER, and unindicted conspirators, known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree with each other to commit the offense of transmitting threats in interstate and foreign commerce, in violation of Title 18, United States Code, Section 875(c), by knowingly sending a message in interstate and foreign commerce containing a true threat to injure the person of another.

MANNER AND MEANS

37. It was part of the conspiracy that the defendants and unindicted conspirators devised a plan to transmit true threats to executives and employees of Maersk Shipping Company in interstate and foreign commerce by trespassing and vandalizing its business property, taking pictures of the damage, and using the internet to post true threats directed at Maersk Shipping Company executives and employees and others complicit in supporting Israel.

OVERT ACTS

38. In furtherance of the conspiracy, and to achieve the objects thereof, the defendants, and others known and unknown to the Grand Jury, committed and caused to be committed, in the Eastern District of Michigan and elsewhere, the following overt acts, among others:

a. On or about June 8, 2024, through on or about July 8, 2024, D-1 ZAINAB ALIASGAR HAKIM searched online for "Maersk" multiple times, adding the words "plymouth mi" and "israel" in some searches, and took a screenshot of her Google Maps result for "Maersk Inc."

b. On or about July 7, 2024, D-1 ZAINAB ALIASGAR HAKIM requested, "money for autonomous actions" from University of Michigan's student organization, SAFE.

c. D-7 MARIAM MUHAMMED ODEH (SAFE president) responded to

D-1 ZAINAB ALIASGAR HAKIM's request that she and another SAFE administrator agreed they could discuss monetary support: "I'm okay with giving money for this but we need to figure out a secure untraceable way."

d. On or about July 8, 2024, at approximately 2:00 a.m., D-1 ZAINAB ALIASGAR HAKIM, D-2 AMATULLAH ALIASGAR HAKIM, D-8 COLIN HUNTER WEGER, and other conspirators vandalized a Maersk Shipping Company building in the Eastern District of Michigan by throwing red paint balloons at the building and smashing the front window. They spraypainted messages on the building and sidewalk:

FREE PALESTINE

FUCK THE IOF

CUT TIES WITH GENOCIDE

FUCK MAERSK

ARMS EMBARGO NOW

INTIFADA

e. On or about July 8, 2024, D-8 COLIN HUNTER WEGER asked D-2 AMATULLAH ALIASGAR HAKIM if she found the knife he had at the action and discussed additional conspirators' presence at the action,

including Unindicted Co-Conspirator Six (UCC-6).

f. On or about July 8, 2024, D-8 COLIN HUNTER WEGER messaged D-7 AMATULLAH ALIASGAR HAKIM that he "[w]as scared to say something in the car cause I didn't want to jinx us but very solid team and we pulled through together," referring to the action.

g. On or about July 8, 2024, Unity of Fields posted a story that included close-up photographs of the action and threatened, in part:

> . . . we will continue to escalate against all empires and those that fund and empower them . . . we encourage all those who read this to take action against the genocidal supply chain and against colonialism.

h. On or about July 9, 2024, Unsalted Counter Info cross-posted the Unity of Field's posting.

i. On or about July 9, 2024, D-3 PAIGE ELIZABETH FEYOCK told D-1 ZAINAB ALIASGAR HAKIM that their actions could "hit Rico territory very quickly."

All in violation of Title 18, United States Code, Section 371.

COUNT FIVE

18 U.S.C. §§ 371; 875(c)

(Conspiracy to Transmit Threats in Interstate and Foreign Commerce)

D-1 ZAINAB ALIASGAR HAKIM
D-2 AMATULLAH ALIASGAR HAKIM
D-3 PAIGE ELIZABETH FEYOCK
D-4 AHMET KEREM KORKAYA
D-5 JONATHAN HONGRU ZOU

39. The Grand Jury incorporates by reference the "General Allegations" above as if they were set forth in full herein.

40. At all times relevant to the Indictment, Victim Three (V-3), whose identity is known to the Grand Jury, served as the Chief Investment Officer at the University of Michigan in Ann Arbor, Michigan. V-3's residence referred to in this Indictment was located in the Eastern District of Michigan.

41. Starting on or about October 2023, and continuing through approximately October 10, 2024, in the Eastern District of Michigan, and elsewhere, the defendants D-1 ZAINAB ALIASGAR HAKIM, D-2 AMATULLAH ALIASGAR HAKIM, D-3 PAIGE ELIZABETH FEYOCK, D-4 AHMET KEREM KORKAYA, D-5 JONATHAN HONGRU ZOU, UCC-6, and others, known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree with each other to commit the offense of transmitting threats in interstate and foreign commerce, in violation of Title 18, United States Code, Section 875(c), by knowingly sending a

message in interstate and foreign commerce containing a true threat to injure the person of another.

MANNER AND MEANS

42. It was part of the conspiracy that the defendants and unindicted conspirators devised a plan to transmit true threats to V-3 in interstate and foreign commerce by trespassing and vandalizing V-3's house, taking pictures of the damage, and using the internet to transmit true threats directed at V-3 and others complicit in supporting Israel.

OVERT ACTS

43. In furtherance of the conspiracy, and to achieve the objects thereof, the defendants, and others known and unknown to the Grand Jury, committed and caused to be committed, in the Eastern District of Michigan and elsewhere, the following overt acts, among others:

a. On or about July 8, 2024, D-1 ZAINAB ALIASGAR HAKIM searched on the internet for "[V-3] umich."

b. On or about August 25, 2024, through on or about September 4, 2024, D-5 JONATHAN HONGRU ZOU's iPhone visited multiple websites related to V-3, including V-3's public biography page and V-3's Facebook page. His iPhone accessed multiple other sites on unknown dates related to V-3, including his LinkedIn profile and Wikipedia

page. D-5 JONATHAN HONGRU ZOU's phone also included Google searches for V-3 such as ["V-3"] and ["V-3] umich."

c. On or about October 2, 2024, D-1 ZAINAB ALIASGAR HAKIM and UCC-6 discussed locations to meet with members of the conspiracy to plan the "autonomous action."

d. On or about October 3, 2024, D-4 AHMET KEREM KORKAYA drove from Wisconsin to Michigan in his black 2022 Kia K5 sedan to participate in the conspiracy's actions.

e. On or about October 6, 2024, D-1 ZAINAB ALIASGAR HAKIM and D-5 JONATHAN HONGRU ZOU collaborated on CryptPad.fr to draft a demand letter to V-3. In one version, they wrote:

> Do not forget, [V-3]: You sleep only because we let you.

f. On or about October 6, 2024, D-3 PAIGE ELIZABETH FEYOCK, D-5 JONATHAN HONGRU ZOU, UCC-6, and unindicted conspirators engaged in numerous conversations across several online platforms to discuss planning and executing actions on October 7, 2024.

g. On or about October 6, 2024, D-5 JONATHAN HONGRU ZOU sent a Signal message to another individual seeking supplies stored on the University of Michigan campus for the actions.

h. On or about October 6, 2024, at approximately 9:00 p.m., D-5

JONATHAN HONGRU ZOU called D-3 PAIGE ELIZABETH FEYOCK twice via Signal. D-3 PAIGE ELIZABETH FEYOCK responded: "Can I call u back in like 20 min / I have a question but would rather call." D-5 JONATHAN HONGRU ZOU and D-3 PAIGE ELIZABETH FEYOCK exchanged calls at approximately 9:29 p.m. and 9:31 p.m.

i. On or about October 6, 2024, at approximately 9:34 p.m., D-5 JONATHAN HONGRU ZOU and D-3 PAIGE ELIZABETH FEYOCK's Signal accounts were added to a group chat named "activities," which also included "Ahmet" (D-4 AHMET KEREM KORKAYA).

j. On or about October 7, 2024 (the one-year anniversary of the Hamas attacks), at approximately 12:22 a.m., D-4 AHMET KEREM KORKAYA sent D-5 JONATHAN HONGRU ZOU a Signal message to "come out" so D-4 AHMET KEREM KORKAYA could drive D-5 JONATHAN HONGRU ZOU to the meeting place.

k. On or about October 7, 2024, at approximately 1:23 a.m., D-3 PAIGE ELIZABETH FEYOCK's Signal account recorded a private encrypted chat with user "family dollar."

l. On or about October 7, 2024, at approximately 2:13 a.m., D-3 PAIGE

ELIZABETH FEYOCK's Signal account recorded a private encrypted chat with user "fd2."

m. On or about October 7, 2024, at approximately 2:13 a.m., D-3 PAIGE ELIZABETH FEYOCK's Signal account recorded an encrypted group chat named "hi," which had two other members: "family dollar" and "fd2."

n. On or about October 7, 2024, a Google account named "AbeSchmidt573" contained Google map queries, including:

- 1:24 a.m.: directions from Family Dollar in Ypsilanti to V-3's house
- 2:42 a.m.: directions from V-3's house to V-4's house
- 3:56 a.m.: directions from V-4's house to the Jewish Federation of Detroit
- 4:22 a.m.: directions from the Jewish Federation of Detroit to Family Dollar in Ypsilanti
- 4:52 a.m.: directions to D-2 AMATULLAH ALIASGAR HAKIM's apartment
- 5:05 a.m.: directions to D-5 JONATHAN HONGRU ZOU's apartment complex
- 5:13 a.m.: directions to Family Dollar in Ypsilanti

o. On or about October 7, 2024, at approximately 2:07 a.m., D-3 PAIGE ELIZABETH FEYOCK searched Google maps for directions to V-3's house.

p. On or about October 7, 2024, at approximately 2:00 a.m., D-1 ZAINAB ALIASGAR HAKIM, D-2 AMATULLAH ALIASGAR

HAKIM, D-4 AHMET KEREM KORKAYA, D-5 JONATHAN HONGRU ZOU, and other conspirators vandalized V-3's house in the Eastern District of Michigan by spray painting inverted red triangles on V-3's house. They also scattered nails in the driveway and spraypainted messages on the house and sidewalk:

FREE PALESTINE

DIVEST NOW

DIVEST

q. On or about October 7, 2024, at approximately 2:00 a.m., conspirators taped a demand note to V-3's garage door that stated, in part:

> Since October 7th of last year, 200,000 Palestinians have been murdered, with the full contribution from the University and its endowment . . . How dare you live in peace with your children when the very bombs you invest in have destroyed so many families? . . . Blood is seeping from every seam, every crack of your house. Divest now.

r. On or about October 7, 2024, at approximately 5:19 a.m., D-5 JONATHAN HONGRU ZOU responded to a 12:28 a.m. text from a friend that asked if he was online:

> now I am. . . . just came back from something im about to pass tf out.

s. On or about October 7, 2024, at approximately 1:01 p.m., @unityoffields posted a story titled, "ANTI-ZIONIST ACTIONISTS

TARGET HOMES OF UMICH LEADERS." The post showed a nighttime photograph of the defaced front of the Jewish Federation of Metropolitan Detroit with "FREE PALESTINE" spraypainted across the door.

t. On or about October 7, 2024, a post with the same photograph, as well as a nighttime photograph of the spraypainted messages on V-3's house, V-4's house, and a black gloved hand holding V-4's demand letter, was posted to @unityoffields with the following message:

> To mark one year of genocide against the Palestinian people, an autonomous group visited the homes of two University of Michigan leaders, [V-4] and [V-3]. They also decorated the offices of the Jewish Federation of Detroit and the Michigan Israel Business Accelerator, organizations that are deeply entrenched in the apartheid state. From businesses to universities, we reject all financial support for the Israeli regime.

u. On or about October 7, 2024, from approximately 9:22 p.m. to 9:44 p.m., D-5 JONATHAN HONGRU ZOU and D-4 AHMET KEREM KORKAYA continued to exchange Signal messages that discussed D-4 AHMET KEREM KORKAYA's drive back to Wisconsin.

v. On or about October 8, 2024, UCC-5 sent a group text to D-1 ZAINAB ALIASGAR HAKIM, D-6 ALEXANDER MATTHEW SEPULVEDA, and unindicted conspirators bragging about the "thread from unity of fields."

w. On or about October 8, 2024, D-4 AHMET KEREM KORKAYA messaged D-5 JONATHAN HONGRU ZOU warning him to be "more secure" when contacting conspiracy members.

x. On or about October 9, 2024, D-3 PAIGE ELIZABETH FEYOCK and D-1 ZAINAB ALIASGAR HAKIM discussed the likelihood of law enforcement discovery, and D-3 PAIGE ELIZABETH FEYOCK agreed to research geofencing techniques. D-3 PAIGE ELIZABETH FEYOCK concluded that D-1 ZAINAB ALIASGAR HAKIM "should be fine" because law enforcement was "not smart enough."

y. On or about October 10, 2024, Unsalted Counter Info cross-posted the @unityoffields story.

All in violation of Title 18, United States Code, Section 371.

COUNT SIX

18 U.S.C. §§ 371; 875(c)

(Conspiracy to Transmit Threats in Interstate and Foreign Commerce)

D-1 ZAINAB ALIASGAR HAKIM
D-2 AMATULLAH ALIASGAR HAKIM
D-3 PAIGE ELIZABETH FEYOCK
D-4 AHMET KEREM KORKAYA
D-5 JONATHAN HONGRU ZOU

44. The Grand Jury incorporates by reference the "General Allegations" above as if they were set forth in full herein.

45. At all times relevant to this Indictment, Victim Four (V-4), whose identity is known to the Grand Jury, served as President at the University of Michigan in Ann Arbor, Michigan. V-4's personal residence was in the Eastern District of Michigan.

46. Starting on or about October 2023, and continuing through approximately October 10, 2024, in the Eastern District of Michigan, and elsewhere, the defendants D-1 ZAINAB ALIASGAR HAKIM, D-2 AMATULLAH ALIASGAR HAKIM, D-3 PAIGE ELIZABETH FEYOCK, D-4 AHMET KEREM KORKAYA, D-5 JONATHAN HONGRU ZOU, UCC-6, and others, known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree with each other to commit the offense of transmitting threats in interstate and foreign commerce, in violation of Title 18, United States Code, Section 875(c), by knowingly sending a message in interstate and foreign commerce containing a true threat to injure the person of another.

MANNER AND MEANS

47. It was part of the conspiracy that the defendants and unindicted conspirators devised a plan to transmit true threats to V-4 in interstate and foreign commerce by trespassing and vandalizing V-4's house, taking pictures of the damage, and using the internet to transmit true threats directed at V-4 and

others complicit in supporting Israel.

OVERT ACTS

48. In furtherance of the conspiracy, and to achieve the objects thereof, the defendants, and others known and unknown to the Grand Jury, committed and caused to be committed, in the Eastern District of Michigan and elsewhere, the following overt acts, among others:

a. On or about May 21, 2024, D-3 PAIGE ELIZABETH FEYOCK and D-4 AHMET KEREM KORKAYA discussed how "[V-4] gotta die," and "[V-4's] entire family is now on my hit list."

b. On or about September 21, 2024, D-3 PAIGE ELIZABETH FEYOCK searched online for information about V-4.

c. On or about October 2, 2024, D-1 ZAINAB ALIASGAR HAKIM and UCC-6 discussed locations to meet with the members of the conspiracy to plan the actions.

d. On or about October 3, 2024, D-4 AHMET KEREM KORKAYA drove from Wisconsin to Michigan in his black 2022 Kia K5 sedan to participate in the conspiracy's actions.

e. On or about October 6, 2024, D-3 PAIGE ELIZABETH FEYOCK, D-5 JONATHAN HONGRU ZOU, UCC-6, and unindicted conspirators engaged in numerous conversations across several online platforms to

discuss planning and executing actions on October 7, 2024.

f. On or about October 6, 2024, D-5 JONATHAN HONGRU ZOU sent a Signal message to another individual seeking supplies stored on the University of Michigan campus for the actions.

g. On or about October 6, 2024, at approximately 9:00 p.m., D-5 JONATHAN HONGRU ZOU called D-3 PAIGE ELIZABETH FEYOCK twice via Signal. D-3 PAIGE ELIZABETH FEYOCK responded: "Can I call u back in like 20 min / I have a question but would rather call." D-5 JONATHAN HONGRU ZOU and D-3 PAIGE ELIZABETH FEYOCK exchanged calls at approximately 9:29 p.m. and 9:31 p.m.

h. On or about October 6, 2024, at approximately 9:34 p.m., D-5 JONATHAN HONGRU ZOU and D-3 PAIGE ELIZABETH FEYOCK's Signal accounts were added to a group chat named "activities," which also included "Ahmet" (D-4 AHMET KEREM KORKAYA).

i. On or about October 6, 2024, at approximately 9:34 p.m., D-5 JONATHAN HONGRU ZOU's Signal account was added to a group chat named "activities." The other member of "activities" was "met" (D-4 AHMET KEREM KORKAYA).

j. On or about October 6, 2024, at approximately 9:34 p.m., D-3 PAIGE ELIZABETH FEYOCK's Signal account was added to a group chat named "activities." The other members were listed as "Ahmet" and "Jonathan."

k. On or about October 7, 2024 (the one-year anniversary of the Hamas attacks), at approximately 12:22 a.m., D-4 AHMET KEREM KORKAYA sent D-5 JONATHAN HONGRU ZOU a Signal message to "come out" so D-4 AHMET KEREM KORKAYA could drive D-5 JONATHAN HONGRU ZOU to the meeting place.

l. On or about October 7, 2024, at approximately 1:23 a.m., D-3 PAIGE ELIZABETH FEYOCK's Signal account recorded a private encrypted chat with user "family dollar."

m. On or about October 7, 2024, at approximately 2:13 a.m., D-3 PAIGE ELIZABETH FEYOCK's Signal account recorded a private encrypted chat with user "fd2."

n. On or about October 7, 2024, at approximately 2:13 a.m., D-3 PAIGE ELIZABETH FEYOCK's Signal account recorded an encrypted group chat named "hi," which had two other members: "family dollar" and "fd2."

o. On or about October 7, 2024, a Google account named

"AbeSchmidt573" contained Google map queries, including:

- 1:24 a.m.: directions from Family Dollar in Ypsilanti to V-3's house
- 2:42 a.m.: directions from V-3's house to V-4's house
- 3:56 a.m.: directions from V-4's house to the Jewish Federation of Detroit
- 4:22 a.m.: directions from the Jewish Federation of Detroit to Family Dollar in Ypsilanti
- 4:52 a.m.: directions to D-2 AMATULLAH ALIASGAR HAKIM's apartment
- 5:05 a.m.: directions to D-5 JONATHAN HONGRU ZOU's apartment complex
- 5:13 a.m.: directions to Family Dollar in Ypsilanti

p. On or about October 7, 2024, at approximately 2:36 a.m., D-3 PAIGE ELIZABETH FEYOCK searched Google maps for directions to V-4's house.

q. To obtain V-4's home address, D-3 PAIGE ELIZABETH FEYOCK, prior to October 7, 2024, collected information online for V-4's legal deed to his house and a real estate website.

r. On or about October 7, 2024, at approximately 3:49 a.m., D-1 ZAINAB ALIASGAR HAKIM, D-2 AMATULLAH ALIASGAR HAKIM, D-4 AHMET KEREM KORKAYA, D-5 JONATHAN HONGRU ZOU, and other conspirators vandalized V-4's house in the Eastern District of Michigan by spray painting inverted red triangles on his house. They also spraypainted messages on his house and

sidewalk:

COWARD

INTIFADA

COMPLICIT

DIVEST NOW

s. On or about October 7, 2024, at approximately 3:49 a.m., the conspirators taped a demand note above the messages that stated, in part:

> [Y]ou violate the terms of your contract by living off of UM property, hiding in fear from the students who will stop at nothing to achieve divestment.

t. On or about October 7, 2024, at approximately 5:19 a.m., D-5 JONATHAN HONGRU ZOU responded to a 12:28 a.m. text from a friend that asked if he was online:

> now I am. . . . just came back from something im about to pass tf out.

u. On or about October 7, 2024, at approximately 1:01 p.m., @unityoffields posted a story titled, "ANTI-ZIONIST ACTIONISTS TARGET HOMES OF UMICH LEADERS." The post included a nighttime photograph showing the defaced front of the Jewish Federation of Metropolitan Detroit with "FREE PALESTINE" spraypainted across the door.

v. On or about October 7, 2024, a post with the same photo, as well as a nighttime photograph of the spraypainted messages on V-3's home, V-4's home, and a black gloved hand holding V-4's demand letter, was posted to @unityoffields with the following message:

> To mark one year of genocide against the Palestinian people, an autonomous group visited the homes of two University of Michigan leaders, [V-4] and [V-3]. They also decorated the offices of the Jewish Federation of Detroit and the Michigan Israel Business Accelerator, organizations that are deeply entrenched in the apartheid state. From businesses to universities, we reject all financial support for the Israeli regime.

w. On or about October 7, 2024, from approximately 9:22 p.m. to 9:44 p.m., D-5 JONATHAN HONGRU ZOU and D-4 AHMET KEREM KORKAYA continued to exchange Signal messages that discussed D-4 AHMET KEREM KORKAYA's drive back to Wisconsin.

x. On or about October 8, 2024, UCC-5 sent a group text to D-1 ZAINAB ALIASGAR HAKIM, D-6 ALEXANDER MATTHEW SEPULVEDA, and unindicted conspirators bragging about the "thread from unity of fields."

y. On or about October 8, 2024, D-4 AHMET KEREM KORKAYA messaged D-5 JONATHAN HONGRU ZOU warning him to be "more secure" when contacting conspiracy members.

z. On or about October 9, 2024, D-3 PAIGE ELIZABETH FEYOCK and

D-1 ZAINAB ALIASGAR HAKIM discussed likelihood of law enforcement discovery, and D-3 PAIGE ELIZABETH FEYOCK agreed to research geofencing techniques. D-3 PAIGE ELIZABETH FEYOCK concluded that D-1 ZAINAB ALIASGAR HAKIM "should be fine" because law enforcement was "not smart enough."

aa. On or about October 10, 2024, Unsalted Counter Info cross-posted the @unityoffields story.

All in violation of Title 18, United States Code, Section 371.

COUNT SEVEN

18 U.S.C. §§ 371; 875(c)

(Conspiracy to Transmit Threats in Interstate and Foreign Commerce)

D-1 ZAINAB ALIASGAR HAKIM
D-2 AMATULLAH ALIASGAR HAKIM
D-3 PAIGE ELIZABETH FEYOCK
D-4 AHMET KEREM KORKAYA
D-5 JONATHAN HONGRU ZOU

49. The Grand Jury incorporates by reference the "General Allegations" above as if they were set forth in full herein.

50. At all times relevant to this Indictment, the Jewish Federation of Metropolitan Detroit was the "cornerstone" of the Jewish Community in the metro-Detroit area. Its building, called the Max M. Fisher Federation Building, was located in the Eastern District of Michigan.

51. Starting on or about October 2023, through on or about October 10, 2024, in the Eastern District of Michigan, and elsewhere, the defendants D-1 ZAINAB ALIASGAR HAKIM, D-2 AMATULLAH ALIASGAR HAKIM, D-3 PAIGE ELIZABETH FEYOCK, D-4 AHMET KEREM KORKAYA, D-5 JONATHAN HONGRU ZOU, UCC-6, and unindicted conspirators, known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree with each other to commit the offense of transmitting threats in interstate and foreign commerce, in violation of Title 18, United States Code, Section 875(c), by knowingly sending a message in interstate and foreign commerce containing a true threat to injure the person of another.

MANNER AND MEANS

52. It was part of the conspiracy that the defendants and unindicted conspirators devised a plan to transmit true threats to individuals associated with the Jewish Federation of Metropolitan Detroit in interstate and foreign commerce by trespassing and vandalizing the Max M. Fisher Federation Building property, taking pictures of the damage, and using the internet to transmit true threats directed at individuals associated with the Jewish Federation of Metropolitan Detroit and others complicit in supporting Israel.

OVERT ACTS

53. In furtherance of the conspiracy, and to achieve the objects thereof, the defendants, and others known and unknown to the Grand Jury, committed and caused to be committed, in the Eastern District of Michigan and elsewhere, the following overt acts, among others:

a. On or about March 13, 2024, D-6 ALEXANDER MATTHEW SEPULVEDA and others trespassed at the Jewish Federation of Detroit and confronted staff members, criticizing the Jewish Federation of Detroit's "shameful[ ]" relationship with a University of Michigan Regent. D-6 ALEXANDER MATTHEW SEPULVEDA warned: "I'll be back . . . . We're going to come back with lots of people."

b. On or about September 16, 2024, D-5 JONATHAN HONGRU ZOU sent D-6 ALEXANDER MATTHEW SEPULVEDA a Signal message asking: "wtf is jewish community security inc."

c. On or about October 2, 2024, D-1 ZAINAB ALIASGAR HAKIM and UCC-6 discussed locations to meet with members of the conspiracy to plan the actions.

d. On or about October 3, 2024, D-4 AHMET KEREM KORKAYA drove from Wisconsin to Michigan in his black 2022 Kia K5 sedan to participate in the conspiracy's actions.

e. On or about October 5, 2024, D-3 PAIGE ELIZABETH FEYOCK searched for a specific security company that provided security services to houses of worship.

f. On or about October 6, 2024, D-5 JONATHAN HONGRU ZOU sent a Signal message to another individual seeking supplies stored on the University of Michigan campus for the actions.

g. On or about October 6, 2024, at approximately 9:00 p.m., D-5 JONATHAN HONGRU ZOU called D-3 PAIGE ELIZABETH FEYOCK twice via Signal. D-3 PAIGE ELIZABETH FEYOCK responded: "Can I call u back in like 20 min / I have a question but would rather call." D-5 JONATHAN HONGRU ZOU and D-3 PAIGE ELIZABETH FEYOCK exchanged calls at approximately 9:29 p.m. and 9:31 p.m.

h. On or about October 6, 2024, at approximately 9:34 p.m., D-5 JONATHAN HONGRU ZOU's Signal account was added to a group chat named "activities." The other member of "activities" was "met" (D-4 AHMET KEREM KORKAYA).

i. On or about October 6, 2024, at approximately 9:34 p.m., D-3 PAIGE ELIZABETH FEYOCK's Signal account was added to a group chat named "activities." The other members were listed as "Ahmet" and

"Jonathan."

j. On or about October 7, 2024 (the one-year anniversary of the Hamas attacks), at approximately 12:22 a.m., D-4 AHMET KEREM KORKAYA sent D-5 JONATHAN HONGRU ZOU a Signal message to "come out" so D-4 AHMET KEREM KORKAYA could drive D-5 JONATHAN HONGRU ZOU to the meeting place.

k. On or about October 7, 2024, at approximately 1:23 a.m., D-3 PAIGE ELIZABETH FEYOCK's Signal account recorded a private encrypted chat with user "family dollar."

l. On or about October 7, 2024, at approximately 2:13 a.m., D-3 PAIGE ELIZABETH FEYOCK's Signal account recorded a private encrypted chat with user "fd2."

m. On or about October 7, 2024, at approximately 2:13 a.m., D-3 PAIGE ELIZABETH FEYOCK's Signal account recorded an encrypted group chat named "hi," which had two other members: "family dollar" and "fd2."

n. On or about October 7, 2024, a Google account named "AbeSchmidt573" contained Google map queries, including:

- 1:24 a.m.: directions from Family Dollar in Ypsilanti to V-3's house
- 2:42 a.m.: directions from V-3's house to V-4's house
- 3:56 a.m.: directions from V-4's house to the Jewish

Federation of Detroit

- 4:22 a.m.: directions from the Jewish Federation of Detroit to Family Dollar in Ypsilanti
- 4:52 a.m.: directions to D-2 AMATULLAH ALIASGAR HAKIM's apartment
- 5:05 a.m.: directions to D-5 JONATHAN HONGRU ZOU's apartment complex
- 5:13 a.m.: directions to Family Dollar in Ypsilanti

o. On or about October 7, 2024, at approximately 4:20 a.m., D-1 ZAINAB ALIASGAR HAKIM, D-2 AMATULLAH ALIASGAR HAKIM, D-4 AHMET KEREM KORKAYA, D-5 JONATHAN HONGRU ZOU, and other conspirators vandalized the Jewish Federation of Metropolitan Detroit in the Eastern District of Michigan by spray painting inverted red triangles on the sidewalk and building and painting over surveillance cameras. They spraypainted messages on the building and sidewalk:

FUCK ISRAEL

FREE PALESTINE

INTIFADA

p. On or about October 7, 2024, at approximately 5:19 a.m., D-5 JONATHAN HONGRU ZOU responded to a 12:28 a.m. text from a friend that asked if he was online:

> now I am. . . . just came back from something im about to pass tf out.

q. On or about October 7, 2024, at approximately 1:01 p.m., @unityoffields posted a story titled, "ANTI-ZIONIST ACTIONISTS TARGET HOMES OF UMICH LEADERS." The post showed a nighttime photograph of the defaced front of the Jewish Federation of Metropolitan Detroit with "FREE PALESTINE" spraypainted across the door.

r. On or about October 7, 2024, a post with the same photograph, as well as a nighttime photograph of the spraypainted messages on V-3's house, V-4's house, and a black gloved hand holding V-4's demand letter, was posted to @unityoffields with the following message:

> To mark one year of genocide against the Palestinian people, an autonomous group visited the homes of two University of Michigan leaders, [V-4] and [V-3]. They also decorated the offices of the Jewish Federation of Detroit and the Michigan Israel Business Accelerator, organizations that are deeply entrenched in the apartheid state. From businesses to universities, we reject all financial support for the Israeli regime.

s. On or about October 7, 2024, from approximately 9:22 p.m. to 9:44 p.m., D-5 JONATHAN HONGRU ZOU and D-4 AHMET KEREM KORKAYA continued to exchange Signal messages that discussed D-4 AHMET KEREM KORKAYA's drive back to Wisconsin.

t. On or about October 8, 2024, UCC-5 sent a group text to D-1 ZAINAB ALIASGAR HAKIM, D-6 ALEXANDER MATTHEW

SEPULVEDA, and unindicted conspirators bragging about the "thread from unity of fields."

u. On or about October 8, 2024, D-4 AHMET KEREM KORKAYA messaged D-5 JONATHAN HONGRU ZOU, warning him to be "more secure" when contacting conspiracy members.

v. On or about October 9, 2024, D-3 PAIGE ELIZABETH FEYOCK and D-1 ZAINAB ALIASGAR HAKIM discussed likelihood of law enforcement discovery, and D-3 PAIGE ELIZABETH FEYOCK agreed to research geofencing techniques. D-3 PAIGE ELIZABETH FEYOCK concluded that D-1 ZAINAB ALIASGAR HAKIM "should be fine" because law enforcement was "not smart enough."

w. On or about October 10, 2024, Unsalted Counter Info cross-posted @unityoffields story.

All in violation of Title 18, United States Code, Section 371.

COUNT EIGHT

18 U.S.C. §§ 371; 875(c)

(Conspiracy to Transmit Threats in Interstate and Foreign Commerce)

D-1 ZAINAB ALIASGAR HAKIM
D-3 PAIGE ELIZABETH FEYOCK
D-4 AHMET KEREM KORKAYA

54. The Grand Jury incorporates by reference the "General Allegations" above as if they were set forth in full herein.

55. At all times relevant to this Indictment, Victim Five (V-5), whose identity is known to the Grand Jury, served as a member of the University of Michigan Department of Public Safety Services (UMDPSS). V-5 lived in the Eastern District of Michigan.

56. Starting on or about October 2023, and continuing through approximately December 1, 2024, in the Eastern District of Michigan, and elsewhere, the defendants D-1 ZAINAB ALIASGAR HAKIM, D-3 PAIGE ELIZABETH FEYOCK, D-4 AHMET KEREM KORKAYA and others, known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree with each other to commit the offense of transmitting threats in interstate and foreign commerce, in violation of Title 18, United States Code, Section 875(c), by knowingly sending a message in interstate and foreign commerce containing a true threat to injure the person of another.

MANNER AND MEANS

57. It was part of the conspiracy that the defendants and unindicted conspirators devised a plan to transmit true threats to V-5 in interstate and foreign commerce by trespassing and vandalizing V-5's house, taking pictures of the damage, and using the internet to transmit true threats directed at V-5 and others complicit in supporting Israel.

OVERT ACTS

58. In furtherance of the conspiracy, and to achieve the objects thereof, the defendants, and others known and unknown to the Grand Jury, committed and caused to be committed, in the Eastern District of Michigan and elsewhere, the following overt acts, among others:

a. On or about September 24, 2024, D-1 ZAINAB ALIASGAR HAKIM downloaded a 398-page guide entitled, "Ecodefense: A Field Guide to Monkeywrenching," that included, among other things, a section on "stink bombs" using butyric acid.

b. On or about October 8, 2024, D-1 ZAINAB ALIASGAR HAKIM viewed a University of Michigan website article discussing V-5's flight from a war-torn country to the United States.

c. On or about October 8, 2024, D-4 AHMET KEREM KORKAYA and D-1 ZAINAB ALIASGAR HAKIM discussed D-4 AHMET KEREM

KORKAYA's research of UMDPSS officers.

d. On or about October 18, 2024, @safeumich posted a video interview of Leila Khaled (a Palestinian militant who helped hijack two airplanes) stating "we look to the words and sacrifices of our honorable freedom fighters for guidance" and "power to the resistance."

e. On or about October 25, 2024, @tharirumich and @safeumich posted a story: "Know Your Cops," to "identify our enemy" and "resist this repression." The post included large photographs of UMDPSS officers with their names and titles, including V-5. Another post repeated the messages and added their salaries, including V-5's salary.

f. On or about November 11, 2024, D-3 PAIGE ELIZABETH FEYOCK told UCC-1 that she needed the password to the "big computer" because D-1 ZAINAB ALIASGAR HAKIM was coming over and they needed "to do some work."

g. On or about November 21, 2024, D-3 PAIGE ELIZABETH FEYOCK messaged D-1 ZAINAB ALIASGAR HAKIM: "Its definitely over for me in the future tho bc [V-5] and [another UMDPSS officer] got a very good look at me and were arguing with me while I was in the building."

h. On or about November 27, 2024, from approximately 1:23 p.m. through 1:43 p.m., D-1 ZAINAB ALIASGAR HAKIM and another

conspirator's cell phones connected to a cell tower in the area close to V-5's house. D-1 ZAINAB ALIASGAR HAKIM and the other individual had approximately four phone contacts while near V-5's house.

i. On or about November 27, 2024, in the overnight hours, D-1 ZAINAB ALIASGAR HAKIM, D-4 AHMET KEREM KORKAYA, and other conspirators vandalized V-5's house in the Eastern Distrct of Michigan by spray painting inverted red triangles on V-5's garage and throwing two clear mason jars containing, among other things, a noxious chemical. One of the jars broke through a plate glass window and landed in V-5's house. They also spraypainted messages on V-5's garage:

GAZA = [V-5's home country]

FUCK 12

FUCK DPSS

j. On or about November 30, 2024, Unsalted Counter Info posted a story titled: "UMPD Officer's Home Redecorated." The story stated:

> Last night, we visited the home of [V-5], a Lieutenant of UMPD. Twenty five years ago, [V-5] fled ethnic cleansing in [V-5's home country]. Today, [V-5] is part of the machine that perpetuates the genocide in Gaza. [V-5] has overseen the brutalization and arrests of people protesting the University of Michigan's funding of "israel" and the companies that are profiting from the blood of

> Palestinians.
>
> We spray painted his garage with the words "GAZA = [V-5's home country], FUCK12, FUCK DPSS" and broke a window of [V-5's] house. We did this to remind those contributing to this genocide that so long as they continue doing so, they are not safe.
>
> Fuck 12. Free Palestine.

All in violation of Title 18, United States Code, Section 371.

COUNT NINE
18 U.S.C. §§ 1512(b)(3); (k)
(Witness Intimidation)

D-1 ZAINAB ALIASGAR HAKIM
D-3 PAIGE ELIZABETH FEYOCK

59. The Grand Jury incorporates by reference the "General Allegations" above, as well as Counts One through Eight above, as if they were set forth in full herein.

60. At all times relevant to this Indictment, Victim Six (V-6), whose identity is known to the Grand Jury, was a student at the University of Michigan in Ann Arbor, Michigan. V-6 resided in the Eastern District of Michigan.

61. Starting on or about July 14, 2024, continuing through approximately August 6, 2024, in the Eastern District of Michigan, the defendants D-1 ZAINAB ALIASGAR HAKIM and D-3 PAIGE ELIZABETH FEYOCK, conspired to, knowingly attempted to, and did intimidate, threaten, corruptly persuade and engage in misleading conduct toward V-6 with the intent to hinder, delay, and

prevent communication to a law enforcement officer of information relating to the commission and possible commission of a Federal offense, transmitting threats in interstate and foreign commerce, in violation of Title 18 United States Code, Sections 1512(b)(3) and (k).

MANNER AND MEANS

62. It was part of the conspiracy that the defendants and unindicted conspirators devised a plan to confront V-6, whom the defendants believed may have been cooperating with federal authorities, and convince V-6 not to provide information to those authorities relating to the defendants' criminal activities.

OVERT ACTS

63. In furtherance of the conspiracy, and to achieve the objects thereof, the defendants, and others known and unknown to the Grand Jury, committed and caused to be committed, in the Eastern District of Michigan and elsewhere, the following over acts, among others:

a. On or about July 14, 2024, D-4 AHMET KEREM KORKAYA and D-3 PAIGE ELIZABETH FEYOCK shared concerns about V-6 being a "snitch" and how V-6 was "going full fed mode now."

b. On or about July 16, 2024, D-3 PAIGE ELIZABETH FEYOCK told D-1 ZAINAB ALIASGAR HAKIM that V-6 was "going to send us to federal prison." D-1 ZAINAB ALIASGAR HAKIM responded:

"imagine we are so careful with so many actions and his ass lands us in jail."

c. On or About August 3, 2024, D-3 PAIGE ELIZABETH FEYOCK advised D-1 ZAINAB ALIASGAR HAKIM that if V-6 knew about D-1 ZAINAB ALIASGAR HAKIM's criminal activity: "this is like not good tho if he knows for sure / And puts you at a lot of risk if he is volatile enough to start yapping to the wrong people to avoid what he thinks is cop surveillance."

d. On or about August 5, 2024, D-3 PAIGE ELIZABETH FEYOCK warned D-1 ZAINAB ALIASGAR HAKIM: "[V-6] is going to get you fucked up / we have to do something about [V-6] / [V-6] is actually a liability / the fact that [V-6] is naming you to [UCC-4] is a major issue."

e. On or about August 5, 2024, D-3 PAIGE ELIZABETH FEYOCK messaged other conspirators indicating that "[V-6] has to be neutralized," and that "Zainab and I are getting coffee with him tomorrow evening / ima strip search [V-6] tomorrow to see if he is wearing a wire / not taking no chances with him."

f. On or about August 6, 2024, D-1 ZAINAB ALIASGAR HAKIM and D-3 PAIGE ELIZABETH FEYOCK confronted V-6 at a coffee shop.

D-3 PAIGE ELIZABETH FEYOCK reported to another conspirator known to the Grand Jury, that "[V-6] knows not to talk about [autonomous actions] and [V-6] doesn't know anything beyond the Ruthven spray paint."

All in violation of Title 18, United States Code, Sections 1512(b)(3) and (k).

COUNT TEN
18 U.S.C. § 2232(a)
(Destruction of Property to Prevent Seizure)

D-6 ALEXANDER MATTHEW SEPULVEDA

64. The Grand Jury incorporates by reference the "General Allegations" above, as well as Counts One through Nine above, as if they were set forth in full herein.

65. At all times relevant to this Indictment, Victim Seven (V-7), whose identity is known to the Grand Jury, served as Provost for the University of Michigan in Ann Arbor, Michigan. V-7 lived in the Eastern District of Michigan.

66. On or about March 15, 2025, Unindicted Co-conspirator Seven (UCC-7) provided D-5 JONATHAN HONGRU ZOU and D-6 ALEXANDER MATTHEW SEPULVEDA with a vehicle to drive to V-7's house in the Eastern District of Michigan, where they, along with conspirators, smashed a large window by throwing two glass jars containing an unknown blue

substance and food compost at it, one of which landed in a bedroom of V-7's house. They also spraypainted V-7's house with inverted red triangles and the words:

DIVEST

FREE PALESTINE

NO HONOR IN GENOCIDE

67. On or about and between March 14, 2025, through and including March 16, 2025, D-6 ALEXANDER MATTHEW SEPULVEDA used his phone and computer to communicate to conspirators about the action.

68. On or about April 23, 2025, law enforcement attempted to execute a search warrant for D-6 ALEXANDER MATTHEW SEPULVEDA's residence and person. While attempting to locate D-6 ALEXANDER MATTHEW SEPULVEDA, law enforcement encountered UCC-4, who immediately warned multiple conspirators via encrypted group chats.

69. On or about April 23, 2025, in the Eastern District of Michigan, the defendant D-6 ALEXANDER MATTHEW SEPULVEDA, before, during, and after the search for and seizure of property pursuant to a search warrant by local, state, and federal law enforcement, persons authorized to make such search and seizure, attempted to and did knowingly remove, delete, transfer, and clear the contents of his cellular phone and computer laptop, for the purpose of

preventing and impairing the Government's lawful authority to take said property into its custody and control and search said property pursuant to a lawful search warrant, in violation of Title 18, United States Code, Section 2232(a).

CRIMINAL FORFEITURE ALLEGATIONS

70. The allegations contained in Counts One through Ten of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461.

71. Upon conviction of the offenses charged in this Indictment, in violation of Title 18, United States Code, Sections 371 and 875(c), the defendants shall forfeit to the United States any property which constitutes or is derived from proceeds traceable to the offenses, pursuant to Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461.

72. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

(a) Cannot be located upon the exercise of due diligence;

(b) Has been transferred or sold to, or deposited with, a third party;

(c) Has been placed beyond the jurisdiction of the Court;

(d) Has been substantially diminished in value; or

(e) Has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461, to seek to forfeit any other property of the defendant up to the value of the forfeitable property described above.

73. Money Judgment: Upon conviction of violating Title 18, United States Code, Sections 371 and 875(c), the defendants shall be ordered to pay the United States a sum of money equal to the total amount of proceeds defendant obtained as a result of such violations.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

JEROME F. GORGON JR.
United States Attorney

s/Danielle Asher
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s/ Matthew Roth
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s/ Robert Kuhn
ROBERT KUHN
Assistant United States Attorney
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Detroit, MI 48226
313-226-9100

Dated: May 20, 2026

United States District Court Eastern District of Michigan	**Criminal Case Cove**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to comple

Case: **5:26-cr-20306**
Assigned To : **Levy, Judith E.**
Referral Judge: **Stafford, Elizabeth A.**
Assign. Date : **5/20/2026**
Description: **USA v. Sealed (jo)**

Companion Case Information	**Companion Case Number:**
This may be a companion case based upon **LCrR 57.10 (b)(4)[1]:**	**Judge Assigned:**
☐ **Yes** ☒ **No**	**AUSA's Initials:** s/MS

FILED
CLERK'S OFFICE
MAY 20 2026
U.S DISTRICT COURT
EASTERN MICHIGAN

Case Title: USA v. Hakim et al.

County where offense occurred : Wayne, Oakland, and Washtenaw

Check One: ☒**Felony** ☐**Misdemeanor** ☐**Petty**

✓ Indictment/____Information --- **no** prior complaint.
____Indictment/____Information --- based upon prior complaint [**Case number:**]
____Indictment/____Information --- based upon **LCrR 57.10 (d)** ***[Complete Superseding section below]***.

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name	**Charges**	**Prior Complaint (if applicable)**

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

May 20, 2026
Date

s/Margaret Smith

Margaret Smith
Assistant United States Attorney
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Detroit, MI 48226-3277
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Attorney Bar #: P71413

[1] Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.