

NJM:RMP/ADR
F. #2023R00939

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

MANSURI MANUCHEKHRI, also known
as “Mansuri Manchekhri” and
“Manysher,”

Defendant.

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF APPLICATION FOR
ARREST WARRANT

(18 U.S.C. §§ 922(g)(5), 1546(a), 2339B, 2
and 3551 *et seq.*)

Case No. 25-MJ-64

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EASTERN DISTRICT OF NEW YORK, SS:

JACK AMARO, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

(CONSPIRACY TO PROVIDE MATERIAL SUPPORT TO THE
ISLAMIC STATE AND THE ISLAMIC STATE–KHORASAN PROVINCE)

In or about and between December 2021 and June 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MANSURI MANUCHEKHRI, together with others, did knowingly and intentionally conspire to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including services and property, including currency and monetary instruments, to one or more foreign terrorist organizations, to wit: the Islamic State (“ISIS”) and the Islamic State-Khorasan Province (“ISIS-K”), which at all relevant times were designated by the Secretary of State as foreign terrorist organizations, pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIS and ISIS-K were designated foreign terrorist organizations

and that ISIS and ISIS-K had engaged in and were engaging in terrorist activity and terrorism, the offense occurred in part within the United States, and the offense occurred in and affected interstate and foreign commerce.

(Title 18, United States Code, Sections 2339B(a)(1) and 3551 *et seq.*)

(POSSESSION OF FIREARM BY PROHIBITED PERSON)

On or about February 27, 2022, within the District of New Jersey and elsewhere, the defendant MANSURI MANUCHEKHRI, together with others, knowing that he was an alien illegally and unlawfully in the United States, did knowingly and intentionally possess in and affecting interstate or foreign commerce a firearm and ammunition, to wit: an AK-47, a Smith & Wesson M&P 15 tactical rifle, and ammunition for each.

(Title 18, United States Code, Sections 922(g)(5), 2 and 3551 *et seq.*)

(IMMIGRATION FRAUD)

On or about March 1, 2021, within the Eastern District of New York and elsewhere, the defendant MANSURI MANUCHEKHRI, together with others, did knowingly and intentionally subscribe as true, under penalty of perjury under Title 28, United States Code, Section 1746, one or more false statements with respect to one or more material facts, to wit: statements concerning the nature and purpose of a marriage between the defendant and a United States citizen and events preceding their divorce, in one or more applications, affidavits, and other documents required by the immigration laws and regulations prescribed thereunder, to wit: a Form I-360, and supporting documents, and knowingly presented such applications, affidavits, and other documents that contained false statements and that failed to contain any reasonable basis in law or fact.

(Title 18, United States Code, Sections 1546(a), 2 and 3551 *et seq.*)

The source of your deponent's information and the grounds for his belief are as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since April 2021. I am currently assigned to the FBI New York Joint Terrorism Task Force. Prior to my employment with the FBI, I was a Special Agent with the United States Department of Transportation, Office of Inspector General, for approximately six years, and a Special Agent with the United States Department of State, Diplomatic Security Service, for approximately four years. I have training and experience in the investigation of domestic and international terrorism and other cross-border offenses. During my tenure in law enforcement, I have participated in numerous criminal and counterterrorism investigations involving numerous investigative tools and techniques. As a result of my experience, I am familiar with strategy, tactics, methods, tradecraft, and techniques of those engaged in terrorism and other criminal activity.

2. I am familiar with the facts and circumstances set forth below from my personal observations during my participation in the investigation, my training and experience, my review of the investigative file, reports of other law enforcement officers, and interviews of witnesses. Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

PROBABLE CAUSE

3. The defendant MANSURI MANUCHEKHRI, also known as "Mansuri Manchekhri" and "Manysher," is a Tajik national and resident of Brooklyn, New York.

MANUCHEKHRI entered the United States in June 2016 on a nonimmigrant tourist (B2) visa and remained after his visa expired in December 2016.

4. Based on the facts set forth below, there is probable cause to believe that the defendant MANSURI MANUCHEKHRI has: conspired to provide material support to ISIS and ISIS-K, each of which is a designated foreign terrorist organization (“FTO”),¹ in violation of 18 U.S.C. § 2339B; possessed and used in interstate commerce numerous firearms, notwithstanding his status as a prohibited person, in violation of 18 U.S.C. § 922(g); and entered a sham marriage for the purpose of fraudulently obtaining immigration status and made numerous materially false statements in sworn immigration applications, in violation of 18 U.S.C. § 1546(a).

¹ On or about October 15, 2004, the U.S. Secretary of State (“Secretary”) designated al Qaeda in Iraq (“AQI”), then known as Jam’at al Tawhid wa’al-Jihad, as a Foreign Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act (the “INA”) and as a Specially Designated Global Terrorist (“SDGT”) under section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA and as an SDGT entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (*i.e.*, “ISIS”—which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the FTO and SDGT listings: Islamic State, ISIL, and ISIS. On March 22, 2019, the Secretary added the following aliases to the FTO and SDGT listings: Amaq News Agency, Al Hayat Media Center, Al-Hayat Media Center, and Al Hayat. To date, ISIS remains a designated FTO.

On or about January 14, 2016, the Secretary designated ISIL Khorasan as an FTO under Section 219 of the INA and on or about January 21, 2016, as an SDGT under section 1(b) of Executive Order 13224. The Secretary of State has also listed the following aliases for ISIL Khorasan: The Islamic State of Iraq and ash-Sham—Khorasan Province, Islamic State’s Khorasan Province, ISIS Wilayah Khorasan, ISIL’s South Asian Branch, South Asian chapter of ISIL, The Islamic State of Iraq and Syria—Khorasan, Islamic State of Iraq and Levant in Khorasan Province, Islamic State Khurasan, ISISK, ISIS-K (which is how this FTO will be referenced herein), and IS-Khorasan. To date, ISIS-K remains a designated FTO.

MATERIAL SUPPORT TO ISIS AND ISIS-K
AND UNLAWFUL POSSESSION OF FIREARM

5. In August 2024, a close family member of the defendant MANSURI MANUCHEKHRI (“Individual-1”) called the New York State Terrorism Tips Hotline and expressed concern that MANUCHEKHRI might commit acts of violence. I subsequently interviewed Individual-1. Individual-1 said that MANUCHEKHRI had committed acts of domestic violence against multiple individuals in the past, and that he had threatened to kill Individual-1 multiple times, most recently by telephone in 2023.

6. Individual-1 also said that the defendant MANSURI MANUCHEKHRI had become increasingly radicalized in recent years and had repeatedly spoken favorably of jihad and used other extremist rhetoric. As one example, Individual-1 said that MANUCHEKHRI specifically praised Sayfullo Saipov, the Uzbek national who committed a terrorist attack in New York City on behalf of ISIS in October 2017, and said that Saipov is “in heaven now.”²

7. I have reviewed materials obtained from the defendant MANSURI MANUCHEKHRI’s iCloud account pursuant to prior judicial authorization, *see* No. 24-MC-4442 (under seal), which contain, *inter alia*, additional evidence corroborating MANUCHEKHRI’s radicalization and evidence of his provision of financial support to ISIS and/or ISIS-K.

8. The defendant MANSURI MANUCHEKHRI has saved to his iCloud account materials that reflect an interest in Islamic extremism and jihad. For instance, saved to his account are at least two jihadi propaganda videos. One of them is a recording of Abu

² Saipov was convicted at trial and sentenced to multiple consecutive life sentences. *See generally United States v. Saipov*, No. 17-CR-722 (VSB) (S.D.N.Y). It is not clear whether MANUCHEKHRI misunderstood Saipov to have committed a suicide attack or if Individual-1 misunderstood MANUCHEKHRI’s comment.

Obaida—the spokesperson for the military wing of Hamas—subtitled in several languages, edited over short video clips of various political leaders as well as battlefield imagery, concluding with an image of a white flag with a black Shahada³ (a combination usually associated with the Taliban) over the words “It is indeed a jihad of victory or martyrdom.”

Another video saved on MANUCHEKHRI’s iCloud account is a 25-minute video apparently produced by an ISIS media apparatus, which includes a lecture by Abu Bakr al-Baghdadi—an Iraqi militant and ISIS leader who was regarded as the first caliph of ISIS until his death in 2019—as well as battlefield footage and images of dead and wounded fighters.

9. The defendant MANSURI MANUCHEKHRI also sent to an associate via WhatsApp a link to a documentary film entitled “Central Asia: The Call of ISIS,” which is, in part, about Gulmurod Salimovich Khalimov, a Tajik military commander who defected to ISIS in 2015. The description text associated with the documentary says, in part, “So what do young people looking for another life, and Khalimov, who could no longer bear the hypocrisy and corruption, have in common? A shared belief that ISIS is the best way to achieve an ideal of justice and purity.” The photo below, which is a thumbnail associated with the documentary video, is saved on MANUCHEKHRI’s iCloud account (Khalimov is second from right):



³ The “Shahada” is an Islamic creed that means “There is no god but God. Muhammad is the messenger of God.” It is often displayed on Islamic flags.

10. The defendant MANSURI MANUCHEKHRI's iCloud account also reflects a history of communications, principally over WhatsApp, with a particular person in Istanbul, Türkiye, whose identity is known to me ("CC-1"). On one occasion, while directing MANUCHEKHRI to send him something at an address in Istanbul, CC-1 said, "Brother, this is my residence address."⁴

11. CC-1 frequently sent the defendant MANSURI MANUCHEKHRI religious messages, often in the form of links to videos on a particular Instagram account, which in one message CC-1 referred to as "my Instagram." This Instagram account, which has 22,000 followers, displays a user bio in Russian that reads "Madrasa for youth," and principally contains extremist Islamic videos in Tajik or Russian, or subtitled in Tajik or Russian.

12. On or about September 20, 2022, CC-1 sent the defendant MANSURI MANUCHEKHRI an audio file of an ISIS nasheed. I know from my training and experience that nasheeds are a form of vocal music used by ISIS as a principal means of distributing propaganda. The particular ISIS nasheed that CC-1 sent to MANUCHEKHRI indicates in its metadata that it was created by Meydan Medya, which I know to be ISIS's Turkish media outlet. The lyrics of the nasheed are, in part, "They have tied my hands and thrown me in prison. The day of revenge is near and we will be glorious against the infidels. To break the chains, we will chant Allahu Akbar."⁵ The audio file of the nasheed includes an embedded "cover" image that is reflective of an ISIS internet radio broadcast, with the words "Islamic State" ("Islam Devleti"), a faint image of the ISIS flag in the background, and an image of a broadcasting microphone.

⁴ MANUCHEKHRI's communications with CC-1 were in Tajik and/or Russian, and all direct quotations herein are draft translations provided by qualified linguists.

⁵ The quotation of the nasheed above is a draft translation provided by a qualified linguist. The original is in Persian, which is part of a dialect continuum (and is mutually intelligible) with Tajik.

This image is similar to those I have seen in other sources associated with ISIS online broadcasts and publications. The image is below:



13. On numerous occasions, spanning from December 2021 until June 2023, the defendant MANSURI MANUCHEKHRI and CC-1 discussed MANUCHEKHRI's transmission of money to CC-1, and apparently his collection of money from other "brothers" to be submitted to CC-1. MANUCHEKHRI regularly sent money to CC-1 through a third party ("Individual-2"), and he also put Individual-2 in direct contact with CC-1 to facilitate these money transfers. I have interviewed Individual-2 and reviewed the contents of his cellphones, communications, and financial records.⁶

⁶ Individual-2 has claimed that MANUCHEKHRI is a participant in an international extortion scheme, of which Individual-2 is a victim, and that MANUCHEKHRI sometimes gave Individual-2 cash to transmit to individuals in Türkiye and other times directed Individual-2 to send money without paying for it, which Individual-2 did to satisfy extortionate demands from others overseas. The records and communications I have reviewed corroborate the existence of an extortionate scheme, but do not support Individual-2's belief that MANUCHEKHRI is involved in it. It thus appears likely that Individual-2 has conflated the conduct of MANUCHEKHRI with the conduct of other persons for whom Individual-2 has transferred money internationally.

14. The defendant MANSURI MANUCHEKHRI's use of Individual-2 as an intermediary to send money to CC-1 appears to have begun on or about December 25, 2021, when MANUCHEKHRI asked CC-1, "Dear brother, can I give them this WhatsApp number?" CC-1 replied, "Give him this WhatsApp" and added a particular name (not CC-1's true name). That same day, MANUCHEKHRI sent several text messages in succession to Individual-2, the first with the name CC-1 had provided, then the phone number for CC-1, then "\$2,000," and finally the message, "Brother, [this is] the WhatsApp number for that brother in Türkiye." On December 28, 2021, Individual-2 texted MANUCHEKHRI an image of a Western Union receipt that displays CC-1's true name as the recipient.

15. I interpret these exchanges to mean that the defendant MANSURI MANUCHEKHRI directed the transmission of \$2,000 to CC-1 and avoided sending it directly by using Individual-2 as an intermediary. It is unclear whether the name CC-1 provided is a real person associated with CC-1 or was used as an alias or code for CC-1 to recognize a new message from Individual-2. Subsequent messages show that this money was received.

16. Specifically, on January 18, 2022, CC-1 sent the defendant MANSURI MANUCHEKHRI a photograph of many stacks of what appears to be Syrian currency. Next to the money is a hand-written sign that reads 05.01.22, which I interpret to mean that the photo was taken on January 5, 2022, and another hand-written sign that says in Russian, "Relief is near, \$2,000," and in Arabic, "May God reward you." CC-1 also sent a photo of a woman and a girl seated on the floor wearing burqas, with what appears to be Syrian currency spread out in front of them, and a hand-written sign that says in Russian, "Relief is near," and in Arabic, "May God reward you." Both photographs are below:



17. CC-1 also sent the defendant MANSURI MANUCHEKHRI a screenshot of text messages in Russian from another person, which said, “24 = were distributed to families,” “24 to sisters and 69 to children,” and “\$50 for the boy who is in jail.”

18. CC-1 also sent an audio recording to the defendant MANSURI MANUCHEKHRI, in which he said, “Brother, this is not photoshop. Just to track down the money. In regard to the money, it was distributed to 24 families and they will receive Syrian currency. For example, for the deceased, their wives receive 30,000 and their children 20,000, depending how many children they have. Praise be upon God; the money has been distributed very well. The money has helped the widows and their children. Just to let you know that this is only half of the money.” Based on my training and experience, and the context of these photographs as discussed further below, I believe that “the deceased” is a reference to battlefield deaths of ISIS members, and I am familiar with the practice of soliciting financial support from ISIS sympathizers for the families of slain ISIS fighters. Additionally, as will be seen more

clearly in other messages below, I believe the reference to another “half” of the money that is not going to these family members likely refers to a portion that goes to others about whom CC-1 is more circumspect to discuss on the telephone: specifically, ISIS fighters.

19. In my training and experience, and from public reporting and other sources of information, I have learned that during the fighting to recapture territory that was previously controlled by ISIS, thousands of people, including ISIS members and their families, were displaced into Al-Hol and Al-Roj detention camps in northern Syria, near the border with Iraq. These camps have been nominally controlled by the Syrian Democratic Forces, and the people in them have received international humanitarian aid, but it has been widely reported that the camps are in substantial part *de facto* governed by ISIS.

20. It has also been publicly reported that ISIS networks, including Tajik-speaking ISIS-K networks, use online and social media platforms to encourage ISIS supporters to transfer money through surreptitious means to support ISIS militants and their families in the camps, and that they send photographs like those above to support these fundraising efforts. For instance, one article⁷ published in June 2022 about fundraising over an ISIS-K–affiliated Telegram channel included the image below, which includes several overlapping elements of the photographs that CC-1 sent to the defendant MANSURI MANUCHEKHRI, including the handwritten sign and message, the display of Syrian currency on the floor, and even the style of tent wall visible in the background:

⁷ See *Tajik Islamic State network fundraises in Russia* (Jun. 13, 2022), <https://eurasianet.org/tajik-islamic-state-network-fundraises-in-russia>.



21. The communications between CC-1 and the defendant MANSURI MANUCHEKHRI reflect numerous other transactions of similar character, in which MANUCHEKHRI tells CC-1 that MANUCHEKHRI is sending money, and which correspond to directions MANUCHEKHRI sent to Individual-2 to send money and financial records showing that the money was sent.

22. The messages also reflect that the defendant MANSURI MANUCHEKHRI was raising money from others to send to CC-1. For instance, on January 18, 2022, shortly after receiving the above photographs from CC-1, MANUCHEKHRI sent CC-1 a voice message that said he had “collected the money that was designated for Madrasa.” In another sent on April 16, 2022, CC-1 said that he “has a list of 125 individuals who are supposed to pay their alms,” and that “each individual should pay \$4 as alms and the money will be sent once collected.” MANUCHEKHRI responded that he would “count everything” and try to send “by early next week.” In another message sent on May 12, 2022, MANUCHEKHRI told CC-1

that he sent \$2,100, of which “\$1,000 was collected as alms” and the rest of which was collected by MANUCHEKHRI “and other brothers.”

23. After the defendant MANSURI MANUCHEKHRI’s message that he sent \$2,100, CC-1 responded by asking if he could “put some [of the money] aside for the brothers,” some of whom “are traveling” and send the rest for “the sisters.” MANUCHEKHRI responded that he approved and added that he was going “to talk to other brothers and once they collect some money,” they would send more. Based on my understanding of the investigation and my experience reviewing communications among members of ISIS and other FTOs, I believe that the distinction drawn between money designated for “the brothers who are traveling” and “the sisters” reflected a distinction between ISIS or ISIS-K members who were outside of the detention camps and family members who are inside of them. The question and response show that MANUCHEKHRI understood he was sending money to both groups.

24. In a message sent on February 24, 2023, CC-1 complained to the defendant MANSURI MANUCHEKHRI about “some brothers who promised to send [him] money” who were “now trying to find excuses or not fulfilling their obligation.” He asked MANUCHEKHRI if he “has gathered the money.” MANUCHEKHRI answered, “Yes brother, I talked to a few brothers and they told me that they can help.”

25. On April 7, 2023, the defendant MANSURI MANUCHEKHRI sent a message to CC-1 that he just sent \$2,300, of which \$1,000 was “alms from a brother,” \$500 was “alms from” a specifically named “brother,” and “\$300 alms” from another unspecified “brother.” CC-1 responded, asking, “Brother, should I use this money where you told me, can you let me know? Also, I was wondering if you collected alms for the month of Ramadan. You remember as I told you that each brother can pay \$3 alms for the month of Ramadan.”

MANUCHEKHRI answered, “Brother, wherever you want to spend the money it is up to you. If you can spend \$1,000 for the brothers and the rest for the sisters, that would be good. In regard to alms for the month of Ramadan, not yet. I will talk to the brothers and let you know.”

26. Based on the defendant MANSURI MANUCHEKHRI’s communications with CC-1 and Individual-2, together with Individual-2’s communications and financial records, I have calculated that between approximately December 2021 and April 2023, MANUCHEKHRI sent or caused to be sent (through Individual-2) approximately \$70,000 to CC-1 and others, including a particular individual in Istanbul whose identity is known to me (“CC-2”). Notably, Individual-2’s text messages with CC-2 coordinating money transfers that MANUCHEKHRI directed include an image of CC-2’s Turkish identity card that indicates that CC-2 is a Tajik national residing in Türkiye, and also an image of a receipt with CC-2’s name indicating receipt of a money transfer in Türkiye in April 2023.

27. According to public reporting, CC-1 was arrested by Turkish authorities in the summer of 2023 for affiliation with ISIS-K. His communications with the defendant MANSURI MANUCHEKHRI as reflected in MANUCHEKHRI’s iCloud account ended in June 2023.

28. According to public reporting, CC-2 was arrested by Turkish authorities in February 2024 for terrorism offenses in connection with the January 28, 2024 terrorist attack on a Roman Catholic church in Istanbul, for which ISIS and/or ISIS-K publicly claimed responsibility. According to public reporting, CC-2’s vehicle, or a vehicle known to have been used by CC-2, was used in the attack.

29. As noted above, the defendant MANSURI MANUCHEKHRI entered the United States on a nonimmigrant visa, which expired in 2016, and as such, he is an alien

unlawfully in the United States and among a class of people for whom possession of a firearm in interstate commerce is prohibited by 18 U.S.C. § 922(g)(5). As described further below, he has twice fraudulently applied for lawful permanent residence status, but at no time has such status been granted. Notwithstanding these facts, the contents of his iCloud account, corroborated by other documentary evidence, reflect that MANUCHEKHRI is a frequent visitor to shooting ranges and regularly possesses and uses firearms.

30. At all times relevant to the Complaint, the defendant MANSURI MANUCHEKHRI was a truck driver who frequently traveled throughout the United States. The photographs and communications in his iCloud account reflect that while on long trips, he has visited many shooting ranges, sometimes with other foreign nationals who also live with him in Brooklyn, New York. His iCloud account contained numerous pictures and videos of MANUCHEKHRI possessing and using firearms at shooting ranges, as reflected in the photographs below:



31. The photographs and communications in the defendant MANSURI MANUCHEKHRI's iCloud account also reflect that MANUCHEKHRI may have been seeking

to illegally purchase a firearm. Specifically, on February 8, 2024, a Russian national with whom MANUCHEKHRI lives and with whom he has visited shooting ranges sent MANUCHEKHRI a screenshot of a separate text message exchange (without further context) about the potential purchase of a gun. In that screenshot, a third party sent several photographs of an old Glock 22 handgun and a text message in Russian, which said that the gun or one like it could be purchased for \$1,000, which the sender noted in parentheses is a substantial cost markup because it would come “without documents, checks, and other things.”

32. On February 27, 2022, the defendant MANSURI MANUCHEKHRI sent to CC-1 a 17-second video of himself at a shooting range in New Jersey, where MANUCHEKHRI went with a naturalized Tajik native with whom he lives in Brooklyn. In the video, MANUCHEKHRI can be seen firing what appears to be an assault rifle at a target. MANUCHEKHRI included with this video a text message to CC-1: “Thank God, I am ready, brother.” CC-1 responded, “Wow, praise be upon God, brother. This is perfect, brother. . . . It has been transferred to the account⁸ on the other side.”

33. I obtained an invoice from the shooting range in New Jersey, which reflects that on February 27, 2022, the defendant MANSURI MANUCHEKHRI and his associate, who listed their shared residence address in Brooklyn, rented a rifle port, an AK-47, and a Smith & Wesson M&P 15 tactical rifle, and purchased ammunition and other gear.

34. Additionally, on June 9, 2022, the defendant MANSURI MANUCHEKHRI sent to CC-1 another video of himself firing what appears to be an assault

⁸ Here, the English word “account” is used in an otherwise Tajik-language sentence, which, according to a qualified Tajik linguist, is typical when referring to a social media or online account (there is a different Tajik word for financial accounts). Thus, this message appears to suggest that CC-1 forwarded or posted the video of MANUCHEKHRI firing the gun to a different communication channel or social media account.

rifle at a target at a shooting range, and he included an audio message in which he said to CC-1, “Praise be upon God. . . . Brother, I go for training at least once or twice a week.”

IMMIGRATION FRAUD

35. After Individual-1 notified the New York Terrorism Tips Hotline of Individual-1’s concern, as described above, that the defendant MANSURI MANUCHEKHRI could commit acts of violence, Individual-1 told me that MANUCHEKHRI also entered a sham marriage in order to obtain legal status in the United States, and that if that fraud did not succeed, MANUCHEKHRI planned to falsely claim to be a victim of domestic violence in order to obtain legal status. The contents of MANUCHEKHRI’s iCloud account, and his immigration files, corroborate Individual-1’s claims.

36. In March 2017, the defendant MANSURI MANUCHEKHRI married a woman (“Individual-3”) who is a United States citizen. Individual-3 was born in the Bronx, lives in the Bronx, and appears never to have lived with MANUCHEKHRI in Brooklyn or anywhere else. MANUCHEKHRI and Individual-3 together filed a petition for MANUCHEKHRI to become a lawful permanent resident as Individual-3’s spouse. Immigration authorities requested additional supporting evidence that MANUCHEKHRI never provided. That original petition was later abandoned in March 2021 when MANUCHEKHRI sought divorce from Individual-3 and filed a petition to become a lawful permanent resident pursuant to the Violence Against Women Act, and claimed to have been abused by Individual-3 and an unknown male associate of Individual-3.

37. Both of the defendant MANSURI MANUCHEKHRI’s petitions were fraudulent. Indeed, MANUCHEKHRI submitted as support to his applications purported copies of utility bills addressed to his name and Individual-3’s name at an address in Brooklyn, which

bills in fact have been altered. I have obtained copies of the same bills directly from the utility company which do not include Individual-3's name, and the utility company confirmed to me that Individual-3's name has never been listed at that address.

38. Moreover, MANUCHEKHRI's iCloud account contained text messages between MANUCHEKHRI and Individual-3 showing that MANUCHEKHRI paid Individual-3 to marry him and that Individual-3 continually demanded more money and threatened to report MANUCHEKHRI to immigration authorities. Their earliest exchanges preserved in the iCloud account are from 2020, when Individual-3 was demanding money to sign divorce papers. For example, on September 6, 2020, Individual-3 texted MANUCHEKHRI, "Not to sound like a asshole but I'm not signing the papers until I get 2000 up front."⁹ MANUCHEKHRI replied, "I don't have that much money." Individual-3 replied, "I'll give you time to save it up / But I'm not signing the papers till I get that."

39. After the defendant MANSURI MANUCHEKHRI failed to respond to several further text messages in the subsequent days, Individual-3 texted him, "I'm giving you chances and you playing I see how you moving I'm trying to be professional and you brushing me off so ima report this to immigration." She added, "Since you not picking up don't look for me to sign any divorce papers cause I'm not signing it at all." The messages reflect that MANUCHEKHRI then sent Individual-3 money, and apparently continued sending money on a monthly basis, but Individual-3 made intermittent demands for more money to pay bills. On February 26, 2021, Individual-3 texted MANUCHEKHRI complaining that he would not send

⁹ Individual-3 is not Tajik and her communications with MANUCHEKHRI are all in English. Typos and other errors are quoted herein exactly as they appear in the original.

more money, saying “I’m helping you out to get ya papers the least you can do is help me out when I need it.”

40. On March 3, 2021, the defendant MANSURI MANUCHEKHRI texted Individual-3 in response to her irregular demands for money that “we agree I will send you march 4 and next will be April 4,” and “you must not break the contract but every time you break.” Individual-3 denied making a contract and MANUCHEKHRI replied, “verbal agreement.” Individual-3 texted, “when we got married things was told different to me,” and “You want what you want and I’m continuing to give it to you but you don’t wanna work with me.” MANUCHEKHRI replied, “Look we agree I’ll give you 200 every month but this month you get more then 300\$.” Individual-3 texted, “First off we didn’t even come to an agreement of how much you was giving in total cause Elizabeth told me 10,000 / Then ya gave her my money when you was suppose to pay me directly I took a 1,000 lost without me having the knowledge she got me for money.”

41. The defendant MANSURI MANUCHEKHRI replied, “if you want to continue this way, I will not send you anything, you can do whatever you want.” Individual-3 replied, “Okay so pay me for the divorce then,” and “You want papers but don’t wanna pay the right price another girl would’ve got you for more.” She added, “Ima just speak to immigration my sister is married the same way I am she knows the system she’s helping me.”

42. On April 4, 2021, when she did not receive her monthly payment from the defendant MANSURI MANUCHEKHRI, Individual-3 texted him, “can you send me the 200\$.” MANUCHEKHRI did not reply, and on April 9, 2021, Individual-3 texted him, “Since you’ve been completely ignoring me IM NOT FILING FOR NO DIVORCE your just gonna be stuck

since you wanna keep playing me like I'm stupid !!! Changing my number don't look for me !!!!
You wanna see ya family pay for the divorce if not then you will never get ya papers !!!!!!"

43. Additionally, the defendant MANSURI MANUCHEKHRI's iCloud accounts contains text messages with another person ("Individual-4") he met through work as a mover and with whom he discussed his sham marriage. On September 6, 2019, Individual-4 asked whether MANUCHEKHRI's friends also found American wives to get green cards, and he said that they did not. Individual-4 asked how MANUCHEKHRI found his American wife, and MANUCHEKHRI said he thought he already told the story. Individual-4 responded, "u didn't tell me the details u just said u got married for green card and that she left."¹⁰ MANUCHEKHRI responded, "Yes."

44. Individual-4 asked, "Why didn't u actually marry her did you not like her[?]" The defendant MANSURI MANUCHEKHRI answered, "No, I don't like her because she drinks a lot and she is a dancer somewhere dancing honestly I don't know, we met twice this affection for the wedding the second time I gave her money." MANUCHEKHRI added that this sham wife "has an unofficial husband." Individual-4 responded that "Dancer is another word for a stripper / Lol." MANUCHEKHRI responded, "Yes she stripper lol."


45. Returning to the same topic the next day, Individual-4 asked, "These women don't marry more than once right or else the government will know they do it for the money," and the defendant MANSURI MANUCHEKHRI responded, "Yes they do for the money." Individual-4 responded, "No I meant they can't do it more than once? / Bctheyll get caught / It's illegal." MANUCHEKHRI answered, "Yes you right."

¹⁰ Individual-4, like Individual-3, is not Tajik and her communications with MANUCHEKHRI are all in English. Typos and other errors are quoted herein exactly as they appear in the original.

CONCLUSION

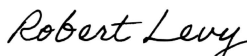
46. In sum, there is probable cause to believe that MANSURI MANUCHEKHRI has (1) conspired to provide material support to ISIS and ISIS-K, each of which is a designated FTO, in violation of 18 U.S.C. § 2339B; (2) possessed and used in interstate commerce a firearm, notwithstanding his status as a prohibited person, in violation of 18 U.S.C. § 922(g); and (3) entered a sham marriage for the purpose of fraudulently obtaining immigration status and made numerous materially false statements in sworn immigration applications, in violation of 18 U.S.C. § 1546(a).

WHEREFORE, your deponent respectfully requests that the defendant MANSURI MANUCHEKHRI be dealt with according to law.



JACK AMARO
Special Agent
Federal Bureau of Investigation

Sworn to before me by telephone this
_25 day of February, 2025



THE HONORABLE ROBERT M. LEVY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK