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SXB

THOMAS G. BRITTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

**JUDGE ROWLAND
MAGISTRATE JUDGE HARJANI**

UNITED STATES OF AMERICA

v.

JASON BROWN,
also known as "Abdul Ja' Me,"
and "Matthew Dobbs"

Case No. 19 CR 858

Violations: Title 18, United States
Code, Sections 922(g)(1), 924(c)(1)(A),
and 2339B; Title 21, United States
Code, Sections 841(a)(1), 846, and 851

SUPERSEDING INDICTMENT

COUNT ONE

The SPECIAL JANUARY 2019 GRAND JURY charges:

1. At times material to this superseding indictment:

a. JASON BROWN, also known as "Abdul Ja' Me," and "Matthew Dobbs," was a resident of Lombard, Illinois.

b. On or about October 15, 2004, the United States Secretary of State designated al-Qa'ida in Iraq, then known as Jam'at al Tawhid wa'al-Jihad, as a foreign terrorist organization under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under section 1(b) of the Executive Order 13224.

c. On or about May 15, 2014, the Secretary of State amended the designation of al-Qa'ida in Iraq as a foreign terrorist organization under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant as its primary name. The Secretary also added the following aliases to the foreign terrorist organization listing: The Islamic State of Iraq

and al-Sham, the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-Iraq wa-sh Sham, Daesh, Dawla al Islamiya, and Al-Furquan Establishment for Media Production.

d. On or about September 21, 2015, the Secretary of State added the following aliases to the foreign terrorist organization listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated foreign terrorist organization.

2. On or about August 16, 2019, at Oakbrook, Illinois, in the Northern District of Illinois, and elsewhere,

JASON BROWN,
also known as "Abdul Ja' Me,"
and "Matthew Dobbs,"

defendant herein, did knowingly attempt to provide material support and resources, namely money in the amount of \$500 and personnel, to a foreign terrorist organization, namely the Islamic State of Iraq and al-Sham, knowing that the organization was a designated foreign terrorist organization, and that the organization had engaged in and was engaging in terrorist activity and terrorism;

In violation of Title 18, United States Code, Sections 2339B and 2.

COUNT TWO

The SPECIAL JANUARY 2019 GRAND JURY further charges:

1. Paragraph 1 of Count One is incorporated here.
2. On or about September 6, 2019, at Oakbrook, Illinois, in the Northern

District of Illinois, and elsewhere,

JASON BROWN,
also known as “Abdul Ja’ Me,”
and “Matthew Dobbs,”

defendant herein, did knowingly attempt to provide material support and resources, namely money in the amount of \$500 and personnel, to a foreign terrorist organization, namely the Islamic State of Iraq and al-Sham, knowing that the organization was a designated foreign terrorist organization, and that the organization had engaged in and was engaging in terrorist activity and terrorism;

In violation of Title 18, United States Code, Sections 2339B and 2.

COUNT THREE

The SPECIAL JANUARY 2019 GRAND JURY further charges:

1. Paragraph 1 of Count One is incorporated here.
2. On or about October 4, 2019, at Oakbrook, Illinois, in the Northern

District of Illinois, and elsewhere,

JASON BROWN,
also known as “Abdul Ja’ Me,”
and “Matthew Dobbs,”

defendant herein, did knowingly attempt to provide material support and resources, namely money in the amount of \$500 and personnel, to a foreign terrorist organization, namely the Islamic State of Iraq and al-Sham, knowing that the organization was a designated foreign terrorist organization, and that the organization had engaged in and was engaging in terrorist activity and terrorism;

In violation of Title 18, United States Code, Sections 2339B and 2.

COUNT FOUR

The SPECIAL JANUARY 2019 GRAND JURY further charges:

1. Beginning no later than in or about June 2018, and continuing until in or about November 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

JASON BROWN,
also known as “Abdul Ja’ Me,”
and “Matthew Dobbs,”

defendant herein, did conspire with Individual A, and others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 100 or more marijuana plants, a Schedule I Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

2. Before JASON BROWN committed the offense charged in this count, JASON BROWN had a final conviction for a serious violent felony, namely, a conviction for second degree murder in Case No. 05 C 44015101 in the Circuit Court of Cook County (Illinois), in violation of 720 ILCS 5/9-2, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT FIVE

The SPECIAL JANUARY 2019 GRAND JURY further charges:

1. On or about November 1, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

JASON BROWN,
also known as "Abdul Ja' Me,"
and "Matthew Dobbs,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

2. Before JASON BROWN committed the offense charged in this count, JASON BROWN had a final conviction for a serious violent felony, namely, a conviction for second degree murder in Case No. 05 C 44015101 in the Circuit Court of Cook County (Illinois), in violation of 720 ILCS 5/9-2, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT SIX

The SPECIAL JANUARY 2019 GRAND JURY further charges:

1. On or about November 1, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

JASON BROWN,
also known as "Abdul Ja' Me,"
and "Matthew Dobbs,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, a mixture and substance containing a detectable amount of marijuana, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

2. Before JASON BROWN committed the offense charged in this count, JASON BROWN had a final conviction for a serious violent felony, namely, a conviction for second degree murder in Case No. 05 C 44015101 in the Circuit Court of Cook County (Illinois), in violation of 720 ILCS 5/9-2, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT SEVEN

The SPECIAL JANUARY 2019 GRAND JURY further charges:

1. On or about November 14, 2019, at Lombard, Illinois in the Northern District of Illinois, Eastern Division,

JASON BROWN,
also known as "Abdul Ja' Me,"
and "Matthew Dobbs,"

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

2. Before JASON BROWN committed the offense charged in this count, JASON BROWN had a final conviction for a serious violent felony, namely, a conviction for second degree murder in Case No. 05 C 44015101 in the Circuit Court of Cook County (Illinois), in violation of 720 ILCS 5/9-2, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT EIGHT

The SPECIAL JANUARY 2019 GRAND JURY further charges:

On or about November 14, 2019, at Lombard, Illinois, in the Northern District of Illinois, Eastern Division,

JASON BROWN,
also known as "Abdul Ja' Me,"
and "Matthew Dobbs,"

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely,

a. a loaded Ruger Model P345 .45 caliber pistol, bearing serial number 665-01473;

b. a loaded Glock 9mm caliber pistol, bearing serial number KBS192;

c. a loaded Glock .45 caliber pistol, bearing serial number WFA-396;
and

d. a loaded Sarsilmaz 9mm pistol, bearing serial number T1102-15G01324;

which firearms had traveled in interstate and foreign commerce prior to defendant's possession of the firearms;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT NINE

The SPECIAL JANUARY 2019 GRAND JURY further charges:

On or about November 14, 2019, at Lombard, Illinois, in the Northern District of Illinois, Eastern Division,

JASON BROWN,
also known as "Abdul Ja' Me,"
and "Matthew Dobbs,"

defendant herein, did knowingly possess a firearm, namely, a loaded Ruger Model P345 .45 caliber pistol, bearing serial number 665-01473, a loaded Glock 9mm caliber pistol, bearing serial number KBS192, a loaded Glock .45 caliber pistol, bearing serial number WFA-396, and a loaded Sarsilmaz 9mm pistol, bearing serial number T1102-15G01324, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Seven of this Superseding Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and 846 as set forth in this Indictment, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Section 853(a).

2. In addition, defendant shall forfeit to the United States of America, any firearm and ammunition involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

3. The property to be forfeited includes, but is not limited to:

a. Ruger Model P345 .45 caliber pistol, bearing serial number 665-01473 and associated ammunition;

b. Glock 9mm caliber pistol, bearing serial number KBS192 and associated ammunition;

c. Glock .45 caliber pistol, bearing serial number WFA-396 and associated ammunition;

d. Sarsilmaz 9mm pistol, bearing serial number T1102-15G01324 and associated ammunition;

e. a 2019 GMC Yukon XL, bearing IL license plate BE43015, VIN 1GKS2HKJ0KR211418;

f. a 2014 Toyota Highlander, bearing IL license plate BR51244, VIN 5TDJKRFH6ES070g588;

g. a 2006 Dodge Ram, bearing no license plate, and VIN 3D7KS29C26G229964; and

h. approximately \$264,310 in United States currency.

4. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

signed by Steven J. Dollear on behalf of the
UNITED STATES ATTORNEY