

FILED

APR -5 2018

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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

UNITED STATES OF AMERICA

v.

JOSEPH D. JONES and
EDWARD SCHIMENTI

Case No. 17 CR 236

Violation: Title 18, United States
Code, Sections 2339B(a)(1) and
1001(a)(2)

JUDGE WOOD

SUPERSEDING INDICTMENT

COUNT ONE

MAGISTRATE JUDGE WEISMAN

The SPECIAL DECEMBER 2017 GRAND JURY charges:

1. At times material to this indictment:

a. 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 Executive Order 13224.

b. 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.

c. 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.

2. Beginning no later than in or about February 2017, and continuing until at least on or about April 7, 2017, in the Northern District of Illinois, and elsewhere,

JOSEPH D. JONES and
EDWARD SCHIMENTI,

defendants herein, knowingly conspired with each other to provide and attempt to provide material support and resources, namely, personnel and equipment, 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, Section 2339B(a)(1).

COUNT TWO

The SPECIAL DECEMBER 2017 GRAND JURY further charges:

1. The allegations of paragraph one of Count One are realleged and incorporated as though fully stated here.

2. At times material to this indictment:

a. The Federal Bureau of Investigation was investigating possible violations of federal criminal law in connection with EDWARD SCHIMENTI and Joseph D. Jones attempting to provide material support and resources to the Islamic State of Iraq and Al Sham (“ISIS”).

b. The following matters, among others, were material to that investigation:

- whether Individual A possessed multiple cellular telephones and for what purpose;
- whether defendant had a conversation about using cellular telephones as detonators;
- whether Individual A told defendant EDWARD SCHIMENTI that Individual A was traveling to SYRIA to join ISIS; and
- Whether defendant EDWARD SCHIMENTI provided anything to anyone that could be used in a violent act.

3. On or about April 12, 2017, at Chicago, in the Northern District of Illinois,

EDWARD SCHIMENTI,

defendant herein, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation involving international terrorism in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency within the executive branch of the Government of the United States, when defendant stated to representatives of the Federal Bureau of Investigation that:

- a. defendant was under the impression that Individual A's family in Syria could repair and sell multiple cellular telephones and was never told the purpose for the cellular telephones was anything different;
- b. defendant never had a conversation about using cellular telephones as bomb detonators;
- c. Individual A never told the defendant that he was traveling to join ISIS; and
- d. defendant never gave anything to anyone that could be used in a violent act.

Whereas, in truth and in fact, as defendant then well knew, these statements were false;

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY