

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)
	)
Plaintiff,	)
	) No. 15 CR 149
vs.	)
	) Judge John Z. Lee,
JONAS EDMONDS,	) presiding
	)
Defendant.	)

**DEFENDANT’S SENTENCING MEMORNADUM**

NOW COMES the Defendant, Jonas Edmonds, by and through his attorney James A. Graham and files this Sentencing Memorandum, and in support states as follows:

Defendant pled to two counts contained in the superseding information. Defendant pled guilty to Count 1, which charges him with conspiring to provide material support to a foreign terrorist organization, specifically the Islamic State or Iraq and the Levant, in violation of Title 18 U.S.C. § 2339B(a)(1) and Count 2 of making a materially false statement to a law enforcement officer regarding an offense involving international terrorism, in violation of Title 18, U.S.C. § 1001(a)(2).

The first count carries a maximum statutory sentence of 15 years. The second count carries a maximum statutory sentence of 8 years. The parties have entered into an 11(c)(1)(C) plea agreement which calls for a sentence of 252 months, or 21 years in custody.

The Defendant entered into this agreement to ward off other charges that were being considered by the government, and his consideration that if other charges were brought, those charges would have exposed Jonas to a substantially higher sentence. As set forth in the Plea Agreement, Guideline § 2M5.3(a), § 2M5.3(b)(1)(E), § 3A1.2, § 3A1.4(a), and § 3C1.1 would have had the cumulative effect of placing him in an Offense Level of 42 (after acceptance) and Guideline § 3A1.4(b) would have driven his Criminal History Category to a VI. See Defendant's Plea Agreement page 10 -12.

These calculations would have placed the Defendant in a Guideline range of 360 months to Life, after a plea. Instead, Jonas Edmonds decided to enter into this agreement.

Under the terms of the agreement the Court can either accept or reject the agreement. If the Court accepts the agreement, the incarceration component of the agreement cannot be changed or altered. That agreement is for Jonas Edmonds to be sentenced to 252 months in custody, or 21 years.

***Facts About the Offense:***

Jonas Edmonds pled guilty to providing material support, and providing a materially false statement to a law enforcement officer, however the elephant in the room, the matter that is impossible to overlook, is the allegation that Jonas Edmonds was going to participate in an attack on the National Guard installation located in Joliet, Illinois.

Jonas Edmonds emphatically states that he never would have actually

gone through with, or participated in an attack on the National Guard installation. He acknowledges that the recordings of him with the undercover FBI employee sound terrible. It is one of the main reasons that he has elected to proceed with this plea. He stands by the position that it was primarily, just bold talk.

Jonas Edmonds considers himself a sincere Muslim. He tries to study and faithfully follow his religion. One glaring detour is that prior to his arrest Jonas Edmonds smoked marijuana several times a day. During the course of the recorded conversations he was under the influence of marijuana.

The FBI employee role playing as a recruiter and representative of ISIS challenged something in Jonas Edmond, making him want to prove he was a dedicated Muslim man. This placed Jonas Edmonds on the defensive, and brought on a bravado in statements from Jonas that are heard on the undercover recordings.

Jonas Edmonds has been extremely upset about the number of the civilian casualties caused by the United State military on Muslim populations in other parts of the world. He has also been affected by the violence perpetrated by ISIS on others, as he has observed on various internet sites. Jonas Edmonds has been seen by various family members in tears after observing some of the violence he has watched over the internet.

As a member of the Muslim religion he has received mixed messages as to what exactly his faith requires of him.

Jonas Edmonds states some of the statements heard on the tape recordings were fueled by his consistent use of marijuana, and apparent need to prove to the FBI employee that he was in fact a sincere Muslim.

Jonas Edmonds points to the following facts that he would like the Court to be aware of;

- 1) He had dropped Hasan Edmonds off at the airport. It was Jonas' understanding that Hasan was on an airplane traveling to Egypt. To the best of Jonas' knowledge the person who had the most knowledge about the base, and could have gained easy access to the installation was on a plane leaving the United States;
- 2) No weapons were arranged for, or procured for any attack. Jonas had no experience with firearms, and was not arranging for, or attempting to train himself on the handling of firearms;
- 3) No date was discussed or set for any attack;
- 4) Jonas wore a long bushy beard which was required by followers of his faith. Jonas had no intention of shaving his beard. When arrested he had that same full beard. The beard made it impossible for him to pass himself off as a National Guard member.

Jonas Edmonds would reiterate that what was said on the recorded conversations was him spouting off, and though everyone recognizes how serious this matter is, he wants the Court to know that he would never have followed through with any attack on the National Guard installation.

***Objections to the Presentence Investigation Report:***

The Defendant in this matter asked the Court to set an expedited sentencing date. As a result the parties have not received a Presentence Investigation Report, and files this memorandum without the benefit of having viewed that report. Objections, if any will have to be filed after the

report is completed.

***Jonas Edmonds Family:***

Jonas Edmonds has a common law wife, a baby son, and several step children. For purposed of the family's privacy, Counsel will rely on the Presentence Investigation Report setting forth in greater detail the names, ages and current circumstances of Jonas' immediate family. Suffice it to say his wife and children stand in support of him.

***Jonas' Expectations During his Incarceration:***

Jonas Edmonds is being held in custody at the M.C.C. in Chicago. As a result of the nature of the charges he has been required to check in every few hours with the officer on duty. Despite being in custody, Jonas has been required to submit to drug testing several times per week. Jonas expects that these and other special conditions may be a part of his future. See

<http://web.law.columbia.edu/human-rights-institute/counterterrorism/domestic-counterterrorism/illusion-justice-report> pp. 131 - 163.

Jonas has filed a motion asking this Court to recommend a facility close to Philadelphia, Pennsylvania, because it would be close to the location of his wife and children. Defendant understands that the Bureau of Prisons is under no obligation of follow that recommendation, and that their oversight in these kinds of cases may dictate placement elsewhere. However, Jonas would like to stress that his ability to stay in regular contact with his wife and children is very important to him. He would ask, that if the Court could make the recommendations requested, that he would greatly appreciate it.

WHEREFORE, Defendant Jonas Edmonds requests that this Court take into consideration the information listed above in fashioning an appropriate sentence. Defendant requests the Court accept the plea agreement and impose the 252 month sentence requested by the parties.

Respectfully submitted,  
*s/ James A. Graham*  
Attorney for  
JONAS EDMONDS

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CERTIFICATE OF SERVICE

I, James A. Graham, an attorney, certify that I shall cause to be served a copy of Defendant's "SENTENCING MEMORANDUM upon the following individual(s) by personal delivery, this 13th day of January, 2016.

TO: Barry Jonas  
John Kness  
Asst. United States Attorney  
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*s/. James A. Graham*  
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