

FILED

JUN 17 2020

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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

UNITED STATES OF AMERICA

v.

HARDY LEE BROWNER

Case No.

20CR 299

Violations: Title 18, United States
Code, Section 1001(a)(2)

JUDGE DOW

Magistrate Judge Jantz

The SPECIAL JANUARY 2019 GRAND JURY charges:

1. At times material to this indictment:

a. The Federal Bureau of Investigation was investigating possible violations of federal criminal law in connection with defendant HARDY LEE BROWNER's communications with Individual A and defendant's communications related to a foreign terrorist organization.

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

- The individual or individuals that used the following Twitter accounts:
@AhkTheBlackArab, @RightlyGuidedTA, @Ahkishaykh, and @ChocolateShaykh;
- Whether defendant communicated with Individual A; and
- Whether defendant communicated with the following Twitter accounts:
@AbuFarriss or @Dawla_NewsMedia.

2. On or about July 15, 2015, at Chicago, in the Northern District of Illinois,

HARDY LEE BROWNER,

defendant herein, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation. The offense involved 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. Specifically, the defendant stated to representatives of the Federal Bureau of Investigation that:

- a. defendant did not use the following Twitter accounts: @AhkTheBlackArab, @RightlyGuidedTA, @Ahkishaykh, and @ChocolateShaykh;
- b. defendant did not communicate with Individual A; and
- c. defendant did not communicate with the following Twitter accounts: @AbuFarriss and @Dawla_NewsMedia.

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