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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

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

Case No. 19 CR 858

JUDGE ROWLAND

MAGISTRATE JUDGE HARJANI

Violation: Title 18, United States Code,
Section 2339B

FILED

COUNT ONE

FEB 26 2020

The SPECIAL JANUARY 2019 GRAND JURY charges:

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

1. At times material to this 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.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY