

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

FARESS MUHAMMAD SHRAITEH

Case No.

Violation: Title 18, United States Code,
Section 2339B(a)(1)

COUNT ONE

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. Defendant Faress Muhammad Shraiteh (“Faress”), Individual A and Individual B, were residents of the Northern District of Illinois.

3. On or about May 8, 2015, defendant purchased plane tickets for himself, Individual A and Individual B to travel from Chicago to Egypt.

4. On or about May 13, 2015, defendant, Individual A and Individual B departed Chicago O’Hare Airport to Egypt on Alitalia Airlines.

5. From on or about May 14, 2015, through on or about May 25, 2015, defendant, Individual A and Individual B stayed in Cairo, Egypt.

6. On or about May 26, 2015, defendant, Individual A and Individual B traveled from Cairo, Egypt to Sharm El-Sheik, Egypt.

7. On or about May 27, 2015, defendant, Individual A and Individual B traveled from Sharm El-Sheik, Egypt to Istanbul, Turkey on Turkish Airlines.

8. On or about May 27, 2015, defendant was denied entry into Turkey. On the same day, defendant traveled to Israel where he had family. Individual A and Individual B entered into Turkey.

9. On or about May 28, 2015, defendant communicated with Individual B his plan to attempt to renew his passport in Israel and join Individual B and Individual A.

10. At some time after May 28, 2015, Individual B was killed while conducting a suicide attack on behalf of ISIS.

11. Beginning no later than in or about November 10, 2014, and continuing until at least on or about June 6, 2015, in the Northern District of Illinois, and elsewhere,

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defendant herein, knowingly conspired with Individual A and Individual B to provide and attempt to provide material support and resources, namely, personnel to include himself, Individual A, and Individual B, 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 charges:

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

2. From on or about May 8, 2015, to on or about May 27, 2015, in the Northern District of Illinois, Eastern Division, and elsewhere,

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defendant herein, knowingly attempted to provide material support and resources, namely, personnel to include himself, Individual A, and Individual B, to a foreign terrorist organization, namely, the Islamic State of Iraq and al Sham, knowing that the organization was a designated terrorist organization and that the organization had engaged and was engaging in terrorist activity and terrorism;

In violation of Title 18, United States Code, Section 2339B(a)(1).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY