

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

HASAN R. EDMONDS and
JONAS M. EDMONDS

CASE NUMBER:

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Beginning no later than in or about January 2015, and continuing until at least on or about March 25, 2015, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants violated:

Code Section

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

Offense Description

conspiring to knowingly provide material support and resources, namely, personnel, to a designated terrorist organization, namely, the Islamic State of Iraq and the Levant, knowing that the organization was a designated terrorist organization, and that the organization had engaged in and was engaging in terrorist activity and terrorism

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

Morgan A. Spurlock
Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence.

Date: March 25, 2015

Judge's signature

City and state: Chicago, Illinois

SHEILA FINNEGAN, U.S. Magistrate Judge
Printed name and Title

each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

4. The statements in this affidavit are based on: (a) my personal knowledge; (b) information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts; and (c) consensually monitored and recorded communications. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation.

5. At various points in the Affidavit, I offer my interpretations of certain communications in brackets and otherwise. These interpretations, which include translations of certain words and phrases in the Arabic language, are based on my knowledge of the investigation to date and review of prior communications, the contents and context of the communications, prior and subsequent communications, conversations with other law enforcement officers and agents, conversations with one or more Arabic translators employed by the FBI, and my experience and familiarity with terrorist organizations generally. Some of these summaries do not include references to all the topics covered during the course of the communications. In addition, the summaries do not necessarily include references to all statements made by the speakers on the topics that are mentioned. Finally, quotations from written communications are as they appear in their original form, including any

grammatical or spelling errors. Although transcribers have attempted to transcribe the conversations accurately, to the extent that quotations from these communications are included, these are preliminary, not final, transcriptions.

SUMMARY

6. As described in more detail below, Hasan R. Edmonds, who resides at Subject Premises 1, and Jonas M. Edmonds, who resides at Subject Premises 2, have conspired with each other to provide material support and resources, namely, personnel in the form of themselves, to a foreign terrorist organization, namely, the Islamic State of Iraq and the Levant (ISIL).

7. As part of an undercover FBI investigation, agents have determined that Hasan Edmonds and Jonas Edmonds have expressed their intention jointly to (a) facilitate travel by Hasan Edmonds, a member of the Army National Guard stationed in Illinois, to travel overseas and fight on behalf of ISIL; and (b) to coordinate an attack by Jonas Edmonds on a U.S. military facility located in northern Illinois.

8. In furtherance of their conspiracy to provide material support and resources, Hasan Edmonds booked airline travel leaving on March 25, 2015, from Chicago, Illinois, and arriving in Cairo, Egypt, on March 26, 2015, with layovers in Detroit, Michigan, and Amsterdam, the Netherlands, and with the intention of traveling overseas to join ISIL and engage in violence on ISIL's behalf.

9. On or about March 25, 2015, Hasan Edmonds was arrested at Chicago Midway Airport in the terminal from which his flight was to depart, while in possession of Subject Bag 1, and after having checked Subject Bag 2 with his airline.

Hasan R. Edmonds and Subject Premises 1

10. According to Illinois driver's license records and his August 2014 passport application, which was submitted to the U.S. Department of State, Hasan R. Edmonds is a 22-year-old United States citizen who resides at Subject Premises 1 in Aurora, Illinois. According to Illinois firearm license records, in or around November 2014, Hasan Edmonds obtained an Illinois license that permits him to carry a firearm.

11. According to records from the U.S. Department of Defense, Hasan Edmonds' middle name is Rasheed, he is a member of the U.S. Army National Guard, and he is assigned to a National Guard unit in the Northern District of Illinois.

12. Based on surveillance, law enforcement agents familiar with the physical appearance of Hasan Edmonds have observed him at Subject Premises 1, both during the day and overnight, on numerous occasions. More specifically, agents have observed Hasan Edmonds present at Subject Premises 1 on or about February 3 and 27, 2015, and March 9 and 10, 2015.

13. Based on a review of various public databases, Hasan Edmonds possesses an Illinois firearm concealed carry permit bearing the address of Subject Premises 1. Also, as of in or about February 2015, Hasan Edmonds was the registrant of a vehicle registered to Subject Premises 1.

14. In addition, surveillance agents have observed Jonas Edmonds at Subject Premises 1, both during the day and overnight, on numerous occasions. More specifically, agents observed Jonas Edmonds at Subject Premises 1 on or about January 28, 2015, February 3 and 27, 2015, and March 9 and 10, 2015. In addition, based on surveillance and as explained more fully below, it appears that Jonas Edmonds lived at Subject Premises 1 until on or about March 14, 2015.

15. Based in part on records obtained from Facebook, as well as other information as set forth in this Affidavit, the Facebook profile “Hasan Rasheed” appears to belong to Hasan Edmonds, whose middle name is Rasheed.¹ More specifically, based on records obtained from Facebook, “Hasan Rasheed” logged into Facebook on December 18, 2014, using a specific Internet Protocol (IP) address. Based on records obtained from an internet service provider, the relevant IP address was, as of December 18, 2014, assigned to Subject Premises 1. In addition, information provided by the user of the “Hasan Rasheed” Facebook profile stated

¹ Based on my training and experience, I know that Facebook is an online social medium on which users can post personal information and commentary, photographs, videos, and other information. Facebook permits users to “friend” other users, thereby allowing “friends” to, among other things, share information, updates, and to suggest other “friends.” To establish a friend relationship on Facebook, a user seeking to friend another user typically sends a friend request to that user, who can then accept, reject, or ignore the request.

that the user graduated from “West Senior High School” in 2011 and resided in Chicago, Illinois. According to information Hasan Edmonds provided to the Office of Personnel Management, he graduated in May 2011 from “Aurora West High School” in Aurora, Illinois.

Jonas M. Edmonds and Subject Premises 2

16. According to Illinois driver’s license records as well as information from a law enforcement database, Jonas Marcel Edmonds is a 29-year-old United States citizen, who currently resides in Aurora, Illinois.² In addition, Jonas Edmonds has a prior felony criminal conviction in the state of Georgia that resulted in him serving a period of incarceration.

17. On or about March 23-24, 2015, surveillance agents familiar with the physical appearance of Jonas Edmonds observed him at Subject Premises 2 in Aurora, Illinois. Also, as explained further below, on or about March 23, 2015, an undercover FBI employee (UC2) met with Jonas Edmonds, as well as Hasan Edmonds, inside Subject Premises 2.

The Islamic State of Iraq and the Levant

18. On or about October 15, 2004, the U.S. Secretary of State designated al-Qaeda 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

² On about February 21, 2015, Jonas Edmonds advised police officers in Aurora, Illinois, that he resided at Subject Premises 1 and that he was moving soon.

and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224.

19. On or about May 15, 2014, the Secretary of State amended the designation of al-Qaeda in Iraq 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 to add the alias Islamic State of Iraq and the Levant (ISIL) as its primary name. The Secretary also added the following aliases to the ISIL 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-Furqan Establishment for Media Production. Although the group has never called itself al-Qaeda in Iraq, this name has frequently been used to describe it through its history. In an audio recording publicly released on June 29, 2014, ISIL announced a formal change of its name to Islamic State.

20. Based on my training and experience, information provided by an Interpol informational publication, and information provided by an FBI Arabic linguist: (a) Sunni extremists and others, who are not citizens or residents of Syria and Iraq, have been traveling to Syria and Iraq to join ISIL and commonly enter Syria by crossing the border from Turkey; (b) to avoid increased law enforcement scrutiny of the common route to Syria through Turkey, foreign fighters from Western countries have traveled to locations in Egypt and on to Syria to join ISIL;

(c) Abu Bakr al-Baghdadi is the current leader of ISIL and is frequently referred to as “Khalifa” or “Khalifa Abu Bakr al-Baghdadi”; and (d) the terms “dowlah,” “dawlah,” “dowla,” and “dawla” are Arabic terms that mean country or state and are commonly used to refer to ISIL, which is also known as “the State.”

Hasan Edmonds’ Contact with an Undercover FBI Employee – UC1

21. In late 2014, an undercover FBI employee (“UC1”) sent a “friend” request to Hasan Edmonds’ “Hasan Rasheed” Facebook profile.

22. On or about January 19, 2015, Hasan Edmonds, using the username “Hasan Edmonds,” sent a message to UC1 through Facebook. In his message, Hasan Edmonds appeared to indicate that he was planning on going on a trip and asked UC1, “Say akhi³ you speak arabic? I’m trying to get my affairs in order and get my funds up for the plung, thought it was smart to plug in with my brothers⁴ while I prepar.” Hasan later clarified, “And I meant plunge. It means to dive/jump in eagerly. I want to make sure my affairs here are set before leaving to give my all for this deen.⁵ From the understanding I was taught this is the proper way. Otherwise I would have just left months ago. insahAllah⁶ soon though. I am working at it each day.”

³ “Akhi” is an Arabic word that means brother.

⁴ During subsequent communications, UC1 purported to be an ISIL fighter located in countries outside of the United States.

⁵ “Deen” is an Arabic word that means “faith.” In addition, the religion of Islam is referred to as the “deen.”

⁶ “Inshallah” is an Arabic word that means “Allah willing.”

23. On or about January 20, 2015, UC1 sent a Facebook message to Hasan Edmonds asking, “Will you go to Turkey or Egypt to study then? Is there a madrasa [Islamic school] you have applied to?” Hasan responded, “I wish to go to Dawlah akhi. I would love to study at in Islamic university but my first mission is simply to show up and be accountable on judgement day in front of our Lord.” As described above, “dawlah” is an Arabic term which means country or state, and is frequently used to refer to ISIL, which is also known as Dawla al Islamiya.

24. On or about January 23, 2015, Hasan Edmonds emailed UC1 from hasan_edmonds@yahoo.com. In his email, Hasan Edmonds wrote “Its Hasan Rasheed. Let’s pick up where we left off inshaAllah.” Subsequently, the two transitioned their communications to another electronic communication method (hereinafter, “Communication Form 1”).⁷

25. On or about January 24, 2015, Hasan Edmonds contacted UC1 through Communication Form 1 and explained that he was preparing to travel overseas in April with his cousin and his cousin’s family.⁸ As Hasan Edmonds stated, “Now inshaAllah we can continue or talks. InshaAllah in a few months around April I’m on my way. I am trying to get my ummah⁹ here ready. I must get

⁷ Communication Form 1 and Communication Form 2 (discussed below) are both electronic communication means that are accessible via cellular telephones.

⁸ Based on records obtained from the provider of Communication Form 1, the account referenced above was linked with the email address hasan_edmonds@yahoo.com.

⁹ “Ummah” is an Arabic word that means “nation.”

my funds and affairs in order inshaAllah. Myself my cousin and his family are all trying to make our hijrah.”¹⁰

26. On or about January 24, 2015, Hasan Edmonds sent UC1 a message in which he indicated that it was a “duty” to support ISIL or to be martyred in the process. Specifically, Hasan Edmonds stated: “Not be easy but i'd rather struggle and strive hard in the cause of Allah rather than sit back and live a ‘comfortable’ life. And what you say is true brother but the banners are up. The State has been established and it is our duty to heed the call. InshaAllah we will complete our task or be granted shahada¹¹ trying. And yes I look forward to the training. I am already in the american kafir¹² army (back when I was still in this dunyah¹³ and not muslim) and now I wish only to serve in the army of Allah alongside my true brothers.” Hasan Edmonds also stated that “I joined the united states army national guard about 3 years ago. I still currently have 3 years left that I have no intention what so ever of fulfilling.”

27. On or about January 24, 2015, Hasan Edmonds wrote to UC1 via Communication Form 1 and explained his familiarity with certain firearms and other weapons based on his military training, stating, among other things, “I am no expert with our weapons but I can get the job done.” He then explained to UC1 the

¹⁰ “Hijrah” is an Arabic word that means “migration.”

¹¹ “Shahada” is an Arabic word that means “martyrdom.”

¹² “Kafir” is an Arabic word that means “infidel.”

¹³ “Dunyah” is an Arabic word that means “of this world.”

various types of firearms used by the National Guard and appeared to reference that there were others in the United States who were willing to either travel to join ISIL or engage in violence in the United States. Specifically, Hasan Edmonds wrote, “To be honest i'm best with my side arm(handgun) and then my rifle. We are few in number compared to the kufar¹⁴ army but there are believers like myself hear in america and we wait amd prepair ourselves for the orders of the Ameer.¹⁵ Either we will make it to dowlah or bring the flames of war to the heart od this land with Allahs promission.”

28. During the same communication, Hasan Edmonds discussed his plans to travel or, in the alternative, to stay in the United States to fight, stating, “I pray to just one time step foot in the land ruled by the Law of the Quran but I am content to fight and die here in the cause of Allah whenever the target is set and the order is given. InshaAllah my brothers will march with me as well.”

29. On or about January 27, 2015, UC1 contacted Hasan Edmonds via Communication Form 1. During the conversation that followed, Hasan Edmonds said that “come April or May we will try,” indicating that Hasan Edmonds and his “cousin” would attempt to travel overseas in April or May 2015. During that same communication, Hasan Edmonds explained that his “cousin” had previously been imprisoned and that “they try hard to keep people like him trapped in america.” He

¹⁴ “Kufar” is the plural of “kafir” and means infidels.

¹⁵ “Ameer” is an Arabic word that means “commander.” Abu Bakr al-Baghdadi is often referred to as “Ameer al-Mu’mineen,” or “Commander of the Believers.”

also said that if his cousin was unable to travel, his cousin would “send his family and then seek shahada [martyrdom] here in the heart of the kuffar state...If this happens the way we want inshaAllah we’ll all be there if not though my sahaba¹⁶ will put the fear of Allah in their hearts and minds right here in the homeland.” As described above, Jonas Edmonds has served time in prison for a previous criminal conviction in Georgia.

30. During the same communication, Hasan Edmonds advised, “I can own handguns shotguns and rifles but no automatic weapons or heavy machine guns. We have plenty people here who have them and hide them so we will do the same.” Also during this communication, following a discussion about Hasan Edmonds’ training with weapons and martial arts, UC1 then asked whether Hasan Edmonds’ cousin was referred to by an alias. Hasan Edmonds responded, “His name is Yunus.”¹⁷

31. During the same communication, UC1 and Hasan discussed Hasan Edmonds and Jonas Edmonds’ allegiance to ISIL and their desire to support ISIL’s goals. In describing whether he had made his oath of allegiance (referred to as “bayat”) to the leader of ISIL (referred to as “khalifa”), Hasan Edmonds stated, “Yunus did before me. He was the one whom first brought it to my attention maybe

¹⁶ “Sahaba” is an Arabic term that means “companion.” Given the context of this and other communications as described in this Affidavit, I believe that Hasan Edmonds’ use of “sahaba” in this communication was a reference to Jonas Edmonds.

¹⁷ As described in this Affidavit, Hasan Edmonds frequently refers to his cousin Jonas Edmonds as “Yunus.” In addition, Yunus is the Arabic form of the English name Jonas.

the same month it was announced. Then after I looked into it for myself I gave my oath after asr. And we have been planning ever since. The harder the brother fight the more hype we become! Until something has to give either we get there or we bring the pain to them here. All the Muslims here are watching though. I have yet to meet a Muslim yet that isn't watching and listening to what's happening in the Dowlah. There are three types here. Pro Dowlah (myself, Yunus, and others), the sleep/undecided muslims, and the munafiqeen who support the kuffar."

32. Later during the communication, while discussing avoiding law enforcement of government detection, Hasan Edmonds said, among other things, "We can surely do something. Even the kaffirs here are fighting the police and government so we can really strike harder in the cause of Allah. The biggest and hardest thing is staying under their radar." Later, he added, "Right. Here they hide and some even pretend to be friends . . . We'd like to cause as much damage and mayhem as possible before being granted shahada."

33. On or about January 27, 2015, Hasan Edmonds told UC1 that an attack on certain public buildings would be feasible. Specifically, Hasan Edmonds said, "It would be hard to pull off a larger scale attack on the government but police stations and courts are pretty easy and it's been done before by kuffar sometimes just one person."

34. On or about January 30, 2015, UC1 contacted Hasan Edmonds via Communication Form 1 and asked whether Hasan Edmonds had finished his plans.

Hasan replied, “Plans have been made. Now we need to get the funds for our travels and build our arsenal here. That’s what we are working at now.”

35. During the same communication, Hasan Edmonds provided advice to UC1 on fighting against the United States and its army, stating, “In all honesty the best way to beat them is to break their will. With the U.S. no matter how many you kill they will keep coming unless the soldiers and the American public no longer have the will to fight.” Hasan Edmonds, after providing UC1 with specific suggestions on how to beat the U.S. military (“attack them at all hours of the day and night from many different directions”), stated, “If we can break their spirits we will win. Whenever we attack them instead of killing them all try to take a few as prisoners for either ransom or to show the world the hours the kufar army will suffer at the hands of the lions of Allah.”

36. During the same communication, Hasan Edmonds stated, “Knowing that we will never stop striving in the cause of Allah will break them. They are terrified now! This is why when they suspect someone of being pro dawlah they send 20 or 30 highly armed police and military personnel to arrest them. They send 20 or 30 for one or two people out of fear. Allah (swt) said for every one of us that stands firm 10 of them will fall! Use the istihad¹⁸ missions to strike fear in their hearts! They will fold.” Also, during this communication, Hasan Edmonds sent UC1

¹⁸ “Istihad” is diligence or the effort an individual can put forth in an activity, or finding a solution for a problem that did not occur in the Quran or during the life of the prophet. It is also spelled Ijtihad.

an image of Hasan Edmonds in what appeared to be a U.S. military uniform and carrying a rifle. Based on a review of Hasan Edmonds' Illinois driver's license photograph, it appears that the person depicted in the image Hasan Edmonds sent to UC1 is Hasan Edmonds.

37. During the same communication, Hasan Edmonds indicated that he was willing to conduct an attack in the United States if directed to do so, stating, "If the ameer command a target here we will follow...Now brother if you have any contacts with any commanders let them know we are in the process of organizing. [. . .] Its a little slower here cause of security and spies but we are on it. Oaths have been given. When the time is right we will strike. If the dawlah has any high let us know so we can link in with them inshaAllah."

38. On or about February 2, 2015, Hasan Edmonds informed UC1 via Communication Form 1 that Jonas Edmonds was willing to conduct an attack in the United States. During this communication, while discussing hijrah (migration), Hasan Edmonds advised, "Yes we are still planning to make hijrah. Yunus and his family plus myself are all trying to get to the land of the believers inshaAllah. He went today to feel out the paperwork for his passport but they were closed. We will try again tomorrow. We are still on the same timeline as far as when we are trying to leave. During this time through we also prepair. InshaAllah my shahaba [Jonas Edmonds] and I can stay the course and hold firm in the will of Allah." From the context of the communications between UC1 and Hasan Edmonds, as well as

communications between Jonas Edmonds and UC1 (discussed below), it appears that when Hasan Edmonds stated that he and Jonas Edmonds were trying to “get to the land of the believers,” he was referring to ISIL.

39. Also during the February 2, 2015 communication, Hasan Edmonds stated, “When the women are under the protection of the dawlah under any province under the dawlaha rule (any country) we are ready for whatever our orders may be. InshaAllah we can go there and come back. We’ll take orders given.” While discussing law enforcement scrutiny, Hasan Edmonds advised, “[. . .] For Yunus and myself we do both want to touch down in the land and we are coming for jihad fisci-billy Allah. Niether of us mind staying here if those are our orders so long as we get our sisters outta her first. Honestly we would love to do something like the brother in Paris did.¹⁹ Hit here and then go to dawlah inshaAllah. We’ll fight where ever need be.” In response, UC1 told Hasan Edmonds that shahada could also be achieved in America if one volunteered. Hasan Edmonds replied, “We understand fully...Shahada is blessing. We have plans in mind. If you know of any other brother over here on the same path as our link us up inshaAllah.” He further stated, “if you find us a route outta here once we get close that’s all we need inshaAllah the rest we will do here inshaAllah.”

¹⁹ Given the context of this and other communications, I believe Hasan Edmonds’ reference to doing “something like the brother in Paris did” was a reference to a January 7, 2015 terrorist attack in Paris against the satirical newspaper Charlie Hebdo.

40. On or about February 6, 2015, Hasan Edmonds informed UC1 via Communication Form 1 that “I have been working and Yunus and his family are trying to get there birth certificates because they need those to get a passport here. We are all working toward our goal but it takes patience, this is why we gave ourselves to at least April or May. Need to get all the documents ready. InshaAllah our work will pay off.” Hasan Edmonds further stated, “Now it seems we’ve found some other brothers here with the same goals as ours akhi. Still screening them but we will let you know.” Later in the conversation, UC1 asked if Hasan Edmonds was planning to travel with Jonas Edmonds’ family. Hasan Edmonds replied, “Yes. Afterwards if the mission requires Yunus and I to say here then so be it. We won’t act until they arw safe under the care of the dawlah though. First step is all needed paperwork and then next is their passports inshaAllah. It take 6-8 weeks here for passports to come in the mail. We will let you know as soon as we have them so we can move forward inshaAllah.”

41. On or about February 26, 2015, UC1 contacted Hasan Edmonds via Communication Form 1. During this communication, among other things, UC1 and Hasan Edmonds discussed engaging in future communications via another communication method (hereinafter, “Communication Form 2”).

42. During the same communication, UC1 asked Hasan Edmonds if he still planned on traveling. Hasan Edmonds replied “InshaAllah it will be Sham.²⁰ If

²⁰ “Sham” is an Arabic term that is used to refer to the geographic area commonly known as Syria or the “Levant.”

not Egypt. In truth I'm fine with whichever part of Dawlah I end up in. Those are just my top two." From the context of the communications, it appeared that Hasan Edmonds was indicating to UC1 that he was willing to join ISIL in either Syria (Sham) or Egypt.

43. On or about March 1, 2015, Hasan Edmonds contacted UC1 via Communication Form 2 and asked UC1 about a safe travel route and the cost of travel. In addition, Hasan Edmonds informed UC1:

I am wondering about your travel route (is it still open or is the enemy on to it like the route from Turkey to Sham now). And home much money is needed to make this hijrah? Yunus and I have already spoken and we both wonder the same thing. I am ready with my passport and such things now but his family is still preparing. I will go first and train in the army. inshaAllah and they will follow once they have everything then need to escape this land of kufar and shirk.²¹

[. . .]

We are meeting a brother soon who claims to have connects to travel as well but Yunus and I trust you so we ask you as well.

[. . .]

From the context and date of the statement (*i.e.*, March 1, 2015), I believe that Hasan's statement of "meeting a brother soon who claims to have connects to travel" was a reference to Jonas Edmonds' meeting with UC2, which occurred on or about March 3, 2015, and is discussed below.

44. During the same communication, in response to Hasan Edmonds' question regarding the route, UC1 advised that the two routes to Syria were through Turkey and Egypt, and that UC1 could assist Hasan Edmonds with

²¹ "Shirk" appears to mean, in this context, the practice of idolatry or polytheism.

traveling to Syria if Hasan Edmonds took the route through Egypt. While discussing the logistics of traveling, including within and outside of Egypt, Hasan Edmonds, stated, “we’ll in this case all that’s left is for me to find out how much these tickets are and inshallAllah I’m on my way. I showed Yunus this message and he said he will speak to you soon regarding his families travels all they’re waiting on is paperwork and they plan to follow as soon as possible from my understanding.” Hasan Edmonds further told UC1, regarding the routes to travel, “I know several Muslims have been caught attempting the Turkey route so tell me why not many americans take the Egypt route. I am open to either way. I think it would raise less alarms on my end if I take the second route . . . either way I’m still coming.”

Jonas Edmonds Communications with UC1

45. On or about February 6, 2015, Jonas Edmonds contacted UC1 via Communication Form 2. In response, UC1 asked, “This is Yunus, the cousin of Hasan?” On or about February 9, 2015, UC1 informed Jonas Edmonds that UC1 was contacting him as a result of UC1’s discussions with Hasan Edmonds. During this communication, UC1 indicated that Hasan Edmonds had informed UC1 that Jonas Edmonds was seeking assistance with moving his family. Jonas Edmonds replied, “How ard you akhi. I was briefed by hasan it is a pleasure finally being able to connect with you. As for your question na’am I seek help in the move of my family.”

46. Later, during the same communication, UC1 told Jonas Edmonds that UC1 was located in an identified foreign country. In response, Jonas Edmonds advised that he (Jonas Edmonds) was located in Chicago. UC1 then asked Jonas Edmonds about his intentions and needs. Jonas Edmonds responded, “Allah is with those who are patient. I as of now need help with the tickets for 8 people and assistance one they have reached the other side. Over the next couple of months part of our preparations is gathering as much money as possible bithni Allah ta ala.” He then identified the 8 people as himself, his wife, his 5 children and Hasan Edmonds, and stated that there may be others as well.

47. During the same communication, UC1 asked Jonas Edmonds what his destination was. Jonas Edmonds replied, “Number one on my list is Mosul...” UC1 warned that Mosul was a dangerous place for children, and that the “raafida²² and taghut²³ armies attack still.” According to open source information, during the time of this communication, the northern Iraqi city of Mosul was under the control of ISIL.

48. During the same communication, Jonas Edmonds asked whether it was possible for him to meet other ISIL supporters in the United States should he be unable to travel. Specifically, Jonas Edmonds asked, “Although I am currently working on it. I am unable to get my passport. If I find myself stuck here. I intend

²² “Raafida” refers to Shia or Shiites, the second largest sect of Islam after the Sunni sect.

²³ “Taghut” refers to Arab and Muslim heads of state. In this context, “taghut” appears to refer to the practice of Muslim people worshipping secular leaders instead of Allah.

to take advantage of being so close to the kuffar. Bithni allahu ta ala. Do you know of brothers on this side. That are not looking to leave.” Later, Jonas Edmonds advised, “[. . .] Well I bring to the table very little when it comes to resources. But whatever I have is for Allah. [. . .].”

49. Following Jonas Edmonds’ statement, UC1 indicated that resources would be available to assist if Jonas’ intention was to travel for the purpose of fighting and not just for hijrah. Jonas Edmonds responded, “My life is for Allah, I am a soldier I His army. Even after I get my family to dowlah I intend to go in the cause. The best of mankind are the mujahideen. May Allah place me among their ranks.”

50. During the same communication, Jonas Edmonds made clear his intentions to the UC1: “The plans are made from two points. One consists of doing all I can to be able to make hijrah with my family. I already let you know that I would need for that. Two, if I cant make hijrah then InshaAllah. I can unleash the lion. What I would need...honestly nothing. I am prepared to go even if its with a rock. But a small team, no more than 5 hardware and maybe a fire cracker. I do have access to hardware.” From the context of this communication and other communications between Jonas Edmonds, Hasan Edmonds, and the UC1, I believe that Jonas Edmonds was informing UC1 that, if he cannot travel, he was willing to commit an attack in the United States and that he already had access to firearms.

51. On or about March 2, 2015, Jonas Edmonds contacted UC1 through Communication Form 2. During the conversation that followed, the two discussed Jonas Edmonds and Hasan Edmonds' intentions. At one point in the conversation, Jonas Edmonds stated, ". . . you spoke with hasan recently MashaAllah i read your message. Whatever goodnss Allah swt has for us with you and the brothers there, we are ready for MashaAllah." UC1 responded, "Hasan speaks of him coming here to Dowlah's blessed walayah in africa, in shaa Allah it is so. He also says you still await the papers for you, and your family." Jonas Edmonds replied, "With that being said we can move forward InshaAllah. InshaAllah just tell us what needs to be done on our end."

52. On or about March 10, 2015, Jonas Edmonds contacted UC1 via Communication Form 2, and stated, "Hasan is looking to head your direction what assistance can we get in the matter." UC1 replied that he could get points of contact for Hasan Edmonds but UC1 needed to know when he was going to travel. Jonas Edmonds responded that that Hasan Edmonds was waiting for the best place to travel to before he purchased his ticket.

Meeting Between Jonas Edmonds and UC2

53. On or about February 19, 2015, Jonas Edmonds contacted a confidential law enforcement source via an online communication medium. As a result of that communication, the source introduced UC2 to Jonas Edmonds via Communication Form 2. In summary, the source described UC2 to Jonas Edmonds

as an individual who could assist Jonas Edmonds and Hasan Edmonds with their intention of traveling from the United States to support ISIL.

54. As a result of this introduction, Jonas Edmonds and UC2 began a series of communications via Communication Form 2 for the purpose of coordinating an in-person meeting.

55. On or about February 28, 2015, UC2 asked Jonas Edmonds if he was serious about traveling and when the travel would take place. Jonas Edmonds replied, "Yea we are serious about answering the call to Allah. As far as when, end of April." At the conclusion of these communications, Jonas Edmonds and UC2 agreed to meet at a public location in Downers Grove, Illinois, on or about March 3, 2015, for the purpose of further planning the activities discussed above.

The March 3, 2015 Meeting Between Jonas Edmonds and UC2

56. Prior to the meeting, on or about March 3, 2015, between Jonas Edmonds and UC2, law enforcement agents observed Hasan Edmonds, Jonas Edmonds, and another individual travel together in one vehicle to the meeting location in Downers Grove, Illinois. After arriving, surveillance agents Hasan Edmonds observed walking around the vicinity of the meeting location while the other individual remained in the vehicle. Based on these observations, it appeared to surveillance agents that Hasan Edmonds was conducting surveillance of the meeting while Jonas Edmonds was inside the meeting location with UC2.

57. During the meeting on or about March 3, 2015, Jonas Edmonds and UC2 exchanged various items of personal information, including Jonas Edmonds admission that he referred to himself as “Yunus.” In addition, Jonas Edmonds informed UC2 that he wanted to “answer the call of Allah upon the island.” Jonas Edmonds also explained that he had been arrested when he was younger and was still dealing with the consequences. Jonas Edmonds stated, “If I find myself to where they just slam the door on me . . . so let the lion go.” Based on the context of this communication, it appeared that Jonas Edmonds was informing UC2 that, if he could not travel as a result of his prior conviction, he would attempt an attack in the United States.

58. Also during the meeting, Jonas Edmonds informed UC2 that he was meeting on behalf of himself and Hasan Edmonds, stating, “I am here on my behalf and his behalf. The other brother behalf I am going to say that and my cousin.” Similarly, Jonas Edmonds later advised, “Yea, other than that I say as far I am here on my behalf. I am here on my sahaba’s [*i.e.*, Hasan’s] behalf, right. Because, ah my [sahaba] he got wings now [meaning that Hasan was able to travel] . . . He’s military. He [Hasan] got several things going on with himself.” After UC2 responded, “OK,” Jonas continued, “See what I am saying, but he [Hasan] ready to whatever, however he is going to be. If I can’t then he is going to be my model.”

59. During the meeting, Jonas Edmonds described his role in planning and committing to Hasan’s and his actions. As he explained to UC2, “I am glad we

got to meet, right because this is a huge step for me, because at this point I been the person kind of leading this charge into this darkness . . . You see what I am saying, because it real unknown to me but [unintelligible] I not going to allow a lost [unintelligible] to keep me from answering his, ah, his call.”

60. During the meeting, Jonas Edmonds and UC2 also discussed the route by which Hasan Edmonds would enter Syria. More specifically, UC2 informed Jonas Edmonds that the safest route to Syria was the “southern route” (*i.e.*, from Egypt into Syria).

61. During the same meeting, Jonas Edmonds discussed Hasan Edmonds’ willingness to abandon his military obligation in order to travel. Jonas Edmonds and UC2 also discussed the safest route to take to avoid government detection and that it might take longer to get to the final destination.

Jonas Edmonds and UC2’s Post-Meeting Communications

62. On or about March 7, 2015, UC2, via Communication Form 2, asked Jonas Edmonds to check the cost of a plane ticket from Toronto to Cairo. Jonas Edmonds replied that he would check and then responded, “1500 at the most 1600.”

63. On or about March 8, 2015, the prior day’s communication continued via Communication Form 2. In discussing whether Hasan Edmonds was prepared to travel, Jonas Edmonds replied, “yea he is prepared for it Alhumdullilah he would need a flight from here to Toronto as well?”

64. Later during the same conversation, Jonas Edmonds asked UC2 “What’s the options for those who shall remain” (*i.e.*, those who could not travel to support ISIL). UC2 replied that they would discuss that soon, and asked whether Jonas Edmonds had a passport available to him. Jonas Edmonds replied that he is “still on it.”

65. On or about March 10, 2015, Jonas Edmonds informed UC2 via Communication Form 2 that: “My sahabah [Hasan Edmonds] is ready to make the move. He has everything he needs and there is nothing holding him back. He has asked that I reach out to you and the bros on your end in hopes that Allah will his bless his situation thru you all.” Jonas continued, “All he is requesting is a contact on the other side to assist him.”

66. On or about March 13, 2015, UC2 provided Jonas Edmonds a list of items Hasan Edmonds would need for his travel, including camping type gear and clothing, and specific types of electronic equipment. Jonas replied, “I got it.”

Hasan Edmonds’ Further Communications With UC1

67. On or about March 11, 2015, Hasan Edmonds informed UC1 via Communication Form 2 that Hasan Edmonds was “looking to buy my ticket in the next few days.” He then asked about immunization shots and if UC1 knew of anyone who had a store in Egypt, because Hasan Edmonds needed “a spot just in case the army asks me for it before allowing me to leave.” Hasan Edmonds further stated that he did not “have a visa yet but what I plan to do is since I have my

passport buy a round trip ticket as if I'm only visiting. I can tell them [the army] that I plan to visit first before moving..." From the context of this communication, I believe that when Hasan Edmonds asked UC1 for information about a store in Egypt, he was preparing a false story so the military did not question his travel.

68. Also on or about March 11, 2015, in a later communication, Hasan Edmonds asked UC1 about the dates that "the brothers" had given. A few hours later, Hasan Edmonds told UC1 that his (Hasan Edmonds') flight "arrives Friday March 27 at 2:15AM in Cairo." Among other things, UC1 provided Hasan Edmonds with information on where to go once he arrived in Egypt. Hasan replied, "The tickets are bought and my trust is in Allah. I can only move forward now. I am fine being in Egypt, Sham, or Libya to be honest akhi. I just want to answer the call."

69. According to information provided by Delta Airlines, on or about March 13, 2015, Hasan Edmonds purchased airline tickets for approximately \$856.70 for the following itinerary departing from Chicago's Midway Airport:

| Date | Departure City | Departure Time | Arrival City | Arrival Time |
|-----------|------------------------|----------------|------------------------|--------------|
| 3/25/2015 | Chicago, IL | 6:35 pm | Detroit, MI | 8:39 pm |
| 3/25/2015 | Detroit, MI | 10:34 pm | Amsterdam, Netherlands | 11:35 am |
| 3/26/2015 | Amsterdam, Netherlands | 8:55 pm | Cairo, Egypt | 2:15 am |
| 4/02/2015 | Cairo, Egypt | 6:40 am | Paris, France | 11:25 am |
| 4/02/2015 | Paris, France | 1:30 pm | Detroit, MI | 4:15 pm |
| 4/02/2015 | Detroit, MI | 5:45 pm | Chicago, IL | 5:58 pm |

70. Based on my training and experience, I have learned that individuals aspiring to travel for purposes of supporting ISIL frequently purchase round trip tickets to avoid detection by law enforcement officers.

71. Also on or about March 11, 2015, UC1 informed Hasan Edmonds that he (Hasan Edmonds) would be going to Derna (Libya) through the Sinai (Egypt) to be with UC1. UC1 also advised that Hasan Edwards would be used to train others or to conduct reconnaissance. UC1 then asked what he would like to do. Hasan Edwards replied:

I will speak to my shahaba about this. I do not have any problems with your request and would be honored to help out however I can. My original goal was simply to fight and sever as a muhadjid.²⁴ I'm not opposed to training the brother my only request is I be allowed to fight and earn my stripes in the field before being given such an honor inshallAllah. Though I have trained in the U.S. army I have not been in combat with them and I refuse to teach my shabaha anything I haven't tested myself yet. This is my only request. Since I don't yet speak Arabic fluently I will be in need of training. Yunus and I are working on fiq of jihad and fiq of Khalifah right now.²⁵ InshallAllah when I arrive I will at least have the proper understanding of my duties and we can go from there inshaAllah.

72. During the same conversation, UC1 asked Hasan Edmonds for help with obtaining military training manuals and weapons specifications. Hasan Edmonds asked how UC1 wanted to receive the information. UC1 advised Hasan Edmonds to download the information, which he was to carry with him when he

²⁴ In this context, "muhadjid" appears to refer to an Islamic fighter.

²⁵ "Fiq" means Shari'ah law or Islamic jurisprudence.

traveled. Hasan Edmonds replied that he would seek assistance from Jonas Edmonds, who, according to Hasan Edmonds, “is skilled with computers.”

73. On or about March 21, 2015, Hasan Edmonds and UC1 communicated via Communication Form 2. During this communication, UC1 provided Hasan Edmonds with information concerning the individual who would assist Hasan Edmonds travel from Egypt to Derna, Libya [a city that was controlled by ISIL]. UC1 also provided Hasan Edmonds with information concerning what he would be doing once he arrived, including the performance of reconnaissance. Also during the communication, Hasan Edmonds informed UC1 that he had obtained some of the military manuals UC1 had requested.

The March 23 and 24, 2015 Meeting Between Hasan Edmonds, Jonas Edmonds, and UC2

74. On or about March 23, 2015, UC2 met with Hasan Edmonds and Jonas Edmonds in Aurora, Illinois. During this meeting, the three initially went to Hasan Edmonds’ residence (Subject Premises 1), and then to a residence which Jonas Edmonds identified as his own (Subject Premises 2). During this meeting, among other things:

a. Hasan Edmonds and UC2 met outside of Jonas Edmonds presence. During this portion of the meeting, Hasan Edmonds informed UC2 that he had been watching videos from “brothers from the State [ISIL],” and that he did not want peace but wanted fighting. Hasan Edmonds also advised that he used to follow a particular Sheik, but ceased doing so when that Sheik attempted to talk

individuals out of engaging in jihad. UC2 and Hasan Edmonds also discussed the items that Hasan Edmonds should bring on his trip. Among other things, Hasan Edmonds said that he would bring cargo pants, hiking boots, and one or two civilian outfits.

b. Hasan Edmonds, Jonas Edmonds, and UC2 then met together. During that meeting, UC2 confirmed that Hasan Edmonds would be fighting for ISIL and not for any other group when he traveled. Jonas Edmonds also stated that he could not wait for Hasan Edmonds to travel because, in effect, one who supported a mujahid was a mujahid. Jonas Edmonds also informed UC2 that, after Hasan Edmonds traveled, Jonas Edmonds would purchase weapons, including AK47s and grenades, from a third-party. Jonas Edmonds also informed UC2 that he (Jonas Edmonds) was planning to attack the military installation at which Hasan Edmonds had been training. Jonas Edmonds also advised that he wanted to conduct the attack with UC2 and that he anticipated a “body count” of 100 to 150 individuals. Hasan Edmonds corrected Jonas Edmonds and advised that the number would be closer to 120. Hasan Edmonds offered to provide Jonas Edmonds and UC2 with a list of the “rankings” (believed to be a reference to the officers). Hasan Edmonds also advised that they should “kill the head.” Hasan Edmonds also confirmed that he would provide Jonas Edmonds with Hasan Edmonds’ military uniforms. During this meeting UC2 indicated that he would like to see the military installation.

75. On or about March 24, 2015, UC2 went to Subject Premises 2 and met with Hasan Edmonds and Jonas Edmonds. During this meeting, the three drove to the military installation they had discussed the previous day. During the drive, the three discussed purchasing weapons and how to conduct an attack. When they arrived, the three discussed, among other things, where soldiers at the installation trained. Also during this meeting, Hasan Edmonds described the inside of the installation and which rooms they should avoid during the attack. Hasan Edmonds also entered the installation and retrieved a military training schedule, which he then gave to Jonas Edmonds.

Information From Hasan Edmonds' Facebook Pages

76. On or about January 20, 2015, Hasan Edmonds posted the following on his Facebook profile: "IS [the Islamic State] has been stopped in Iraq huh? More lies . . .," which also contained a linked article bearing the headline, "Canada special forces clash with IS [the Islamic State] in Iraq." In addition, Hasan Edmonds posted a link to a YouTube video appearing under the name "Abu Bakr al-Baghdadi-What is Terrorism."

77. On or about January 24, 2015, Hasan Edmonds shared a link on his Facebook profile showing a photograph of what appeared to be soldiers positioned under the Eiffel Tower, and referring to an article regarding former French soldiers who had joined ISIL.

The March 25, 2015 Arrest of Hasan Edmonds

78. On or about March 25, 2015, at approximately 3:15 p.m., surveillance agents observed Hasan Edmonds, Jonas Edmonds, and two other individuals depart Subject Premises 1 with luggage and enter a minivan. Agents then observed the group drive to Chicago Midway Airport. After arriving there, Hasan Edmonds exited the van and the van drove away. Hasan Edmonds then entered the airport with a black backpack and a black roller bag.

79. At approximately 4:25 p.m., agents observed Hasan Edmonds at the Delta ticket counter and appeared to be checking a black suitcase, while retaining the black backpack. At approximately 4:50 p.m., he was observed going through the Transportation Security Administration security area.

80. At approximately 5:21 p.m., Hasan Edmonds was arrested in the terminal from which his flight was to depart. At the time of his arrest, he had in his possession Subject Bag 1, a black ES backpack. Agents also obtained Subject Bag 2, a black Coronado suitcase, which Hasan Edmonds had checked in at the Delta counter. Subject Bag 1 and Subject Bag 2 are both in the custody of the FBI in the Northern District of Illinois.

FURTHER AFFIANT SAYETH NOT.

Morgan A. Spurlock
Special Agent
Federal Bureau of Investigation

Subscribed and sworn
before me this 25th day of March, 2015

Honorable SHEILA FINNEGAN
United States Magistrate Judge