REDACTED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

UNITED STATES OF AMERICA	)	
	)	
	)	CAUSE NO: 2:18CR33
V.	)	Violation: 18 U.S.C. § 2339B & 2
	)	
SAMANTHA ELHASSANI	)	

FILED
18 AUG 22 PM 3:44
ROBERT A. GRIVICH
U.S. DISTRICT COURT
FOR THE NORTHERN DISTRICT
OF INDIANA

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1
18 U.S.C § 2339B
(Conspiracy to Provide Material Support to ISIS)

Beginning as early as the Fall 2014 and continuing through in or around the Summer of 2015, the exact dates being unknown to the Grand Jury, beginning within the Northern District of Indiana and later occurring elsewhere, the defendant,

SAMANTHA ELHASSANI,

a national of the United States, Individual A, and Individual B, together with others known and unknown to the Grand Jury, knowingly conspired to provide material support and resources, as that term is defined in Title 18, United States Code, § 2339A(b)(1), that is, personnel, including funds and tactical gear for such personnel to use, among other things, to work under the direction and control of the Islamic State of Iraq and al-Sham (ISIS), which at all relevant

times has been designated by the Secretary of State as a foreign terrorist organization, knowing that the organization was a designated terrorist organization, and knowing that the organization had engaged in, and was engaging in, terrorist activity and terrorism;

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

THE GRAND JURY FURTHER CHARGES:

COUNT 2

18 U.S.C § 2339B
(Aiding and Abetting Individual A and Individual B In Providing Material Support to ISIS)

From on or about March 23, 2015 to on or about April 7, 2015, the exact dates being unknown to the Grand Jury, the defendant,

SAMANTHA ELHASSANI,

a national of the United States, did knowingly provide material support and resources, as that term is defined in Title 18, United States Code, §2339A(b)(1), that is, aiding and abetting Individual A and Individual B in providing themselves as personnel to ISIS, including by procuring tactical gear and funds for their use in fighting for ISIS, which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization, knowing that the organization was a designated terrorist organization, and knowing that the organization had engaged in, and was engaging in, terrorist activity and terrorism, all in violation of Title 18, United States Code §2339B(a)(1).

The conduct alleged in Count 2 occurred outside the jurisdiction of any particular State or district. Prior to the conduct alleged in Count 2, the

defendant, **SAMANTHA ELHASSANI**, last resided in and was first brought in, the Northern District of Indiana.

All in violation of Title 18, United States Code, Sections 2339B and 2.

A TRUE BILL

/s/ Foreperson
Foreperson

THOMAS L. KIRSCH II,
United States Attorney

By: /s/ Joshua P. Kolar
Joshua P. Kolar
Abizer Zanzi
Assistant U. S. Attorneys