

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

00A
7-22-20
United States Of America

v.

Jill Marie Jones

Case No.:

20-8217MJ

CRIMINAL COMPLAINT

I, Nicole K. Engstrom, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

COUNT ONE

**(Attempt to Provide Material Support and Resources to a
Designated Foreign Terrorist Organization)**

On or between March 4, 2020, and on or about July 22, 2020, in the County of Maricopa, in the District of Arizona, the defendant Jill Marie Jones, a United States citizen, did knowingly attempt to provide material support and resources, namely approximately \$500 in currency or monetary instruments, a foreign terrorist organization, to wit, al Qaeda, which at all relevant times was designated by the United States Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that al Qaeda had engaged in and was engaging in terrorist activity and terrorism.

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

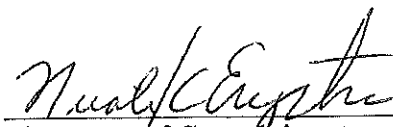
I further state that I am a Federal Bureau of Investigation Task Force Officer (TFO) and that this complaint is based on the following facts:

See Attached Statement of Probable Cause Incorporated By Reference Herein.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

AUTHORIZED BY: Lisa Jennis, AUSA 

Nicole K. Engstrom, FBI TFO
Name of Complainant


Signature of Complainant

Sworn to before me telephonically

7-23-20
Date

at Phoenix, Arizona
City and State

HONORABLE JOHN Z. BOYLE
United States Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT

I, Nicole K. Engstrom, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Peace Officer in Arizona, as defined by Arizona Revised Statute Section 13-105 and have been since 1998. I am currently employed as a detective with the Scottsdale Police Department and have been employed by the Scottsdale Police Department since December 2002. Since May 2019, I have been concurrently assigned to the Special Investigations Section and to the Federal Bureau of Investigation (FBI), Joint Terrorism Task Force (JTTF). As such, I am crossed deputized as a Special Deputy United States Marshal, and a federal law enforcement officer within the meaning of Rule 41(a), Federal Rules of Criminal Procedure. During my assignment as a Special Deputy U.S. Marshal, I have been a full-time member of the JTTF at the FBI's Phoenix Division where I have investigated numerous criminal violations, including those related to terrorism. In this capacity, I investigate numerous criminal violations, including those related to international terrorism, such as allegations of the provision of material support to designated foreign terrorist organizations. In addition to my on-the-job experience, the FBI provided me with extensive training in international terrorism and the techniques used to investigate allegations of international terrorism.

2. I make this affidavit in support of an application for a criminal complaint for Jill Marie JONES, a United States citizen, residing in Chandler, Arizona, for violating Title 18, United States Code (U.S.C.), § 2339B(a)(1), Attempting to Provide Material Support to a Designated Foreign Terrorist Organization (FTO).

3. The facts set forth in this affidavit are based on my own personal knowledge, information provided by two FBI online covert employees (hereafter OCE-1 and OCE-2) as discussed herein, information provided by other law enforcement officers, my review of

documents and computer records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. This affidavit is solely intended to show that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause to believe that JONES attempted to provide material support and resources to a FTO—that is, al Qaeda (AQ)—in violation of Title 18, United States Code, § 2339B(a)(1). Specifically, JONES attempted to provide material support and resources, in the form of “currency or monetary instruments” as referenced in 18 U.S.C. §§ 2339B(a)(1) and 2339A(b)(1), including money contained on a Visa Prepaid card, intended for al Qaeda.

5. JONES is a 35-year old United States citizen who currently resides in Chandler, Arizona. As set forth in greater detail below, JONES has been in communication with OCE-1 and OCE-2. JONES believed OCE-2 to be a member of al Qaeda. During her conversations with OCE-2, JONES agreed to send OCE-2 money to purchase scopes for rifles that would be used by al Qaeda to kill American soldiers. On or about May 25, 2020, JONES sent OCE-2 \$500 using a Visa Prepaid card. In addition, JONES discussed her intention and plans to travel overseas to join and support terrorists and terrorist organizations.

APPLICABLE LAW

6. Title 18, United States Code, Section 2339B(a)(1) prohibits, in pertinent part, a person from knowingly providing “material support or resources to a foreign terrorist organization,” or attempting to do the same.

7. The term “material support or resources” means any property, tangible or intangible, or service, including currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safe houses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel (1 or more individuals who may be or include oneself), and transportation, except medicine or religious materials.” Title 18 United States Code, Section 2339A(b)(1).

AL QAEDA

8. On October 8, 1999, the United States Secretary of State designated al-Qa’ida (“AQ”), also known as al Qaeda, as Foreign Terrorist Organization (“FTO”) 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. The Secretary of State also added the following aliases to the FTO listing: “the Base,” the Islamic Army, the World Islamic Front for Jihad Against Jews and Crusaders, the Islamic Army for the Liberation of the Holy Places, the Usama Bin Laden Network, the Usama Bin Laden Organization, Islamic Salvation Foundation, and The Group for the Preservation of the Holy Sites. To date, AQ remains a designated FTO.

PROBABLE CAUSE

9. The FBI investigation revealed that JONES espoused violence in furtherance of Islamic extremist ideology within a Social Media Platform #1 (hereinafter SMP-1)¹. It also revealed that JONES supports jihad,² Sharia Law, and retaliation against the United States military and government actions occurring outside of the United States.

¹ Social Media Platform #1 is a cloud-based messaging application and voice over IP service that allows users to exchange messages, photos, videos, and files, both non-secure and secured.

² *Jihad* is an Arabic word that literally means striving or struggling, but in the context of al Qaeda supporters, it commonly refers to a holy war, fight, or struggle against the enemies of Islam.

10. On or about March 4, 2020, JONES initiated contact with an FBI Online Covert Employee (OCE-1).

11. On or about April 1, 2020, JONES via SMP-1 told OCE-1 that she “refused [to pledge allegiance to the flag] in school even when it was mandatory.” During that same conversation, JONES sent OCE-1, an article titled “The Way Forward: A word of advice on the Coronavirus pandemic,” which was released by al Qaeda’s central media outlet, As-Sahab media foundation, on March 31, 2020. JONES also sent a screenshot of the article’s title with “al-Qaeda” circled and told OCE-1, “If you want me to share truth then I will. I just wanted you to know where it comes from so I don’t get yelled at later if ya didn’t notice haha.”

12. On or about April 2 and 3, 2020, JONES sent multiple mujahedeen³ videos to OCE-1 via SMP-2⁴. JONES also communicated with OCE-1 via SMP-2 about watching videos of mujahedeen attacks in Afghanistan and how the mujahedeen post notices warning people that they must follow Sharia Law and if they don’t Allah will punish them. JONES said that she “did not pity those that died . . . If they knew and went anyway to their office, they chose dunya over deen”.⁵

13. On or about April 15, 2020, JONES told OCE-1 via SMP-1 that if her COVID-19 stimulus check were bigger, she would use it to leave the United States. JONES also told OCE-1 that she had at least one prior chance to leave the United States but it was too risky and she didn’t want to be kidnapped.

³ Based on my training and experience, conversations with other experienced agents, and conversations with FBI linguists fluent in Arabic, I have learned that mujahideen (or mujahedeen) are those who are engaged in jihad. Your affiant believes JONES uses this term in that manner.

⁴ Social Media Platform #2 is a cloud-based messaging application and voice over IP service similar to SMP-1 that allows users to exchange messages, photos, videos, and files, both non-secure and secured.

⁵ Based on my training and experience, conversations with other experienced agents, and conversations with FBI linguists fluent in Arabic, I have learned that “Dunya over Deen” means earthly world over religion.

14. On or about April 30, 2020, JONES forwarded a conversation that JONES had with an unknown SMP-1 user who asked JONES where she would like to go to help other “sisters” and how JONES would get there. On or about May 1, 2020, JONES continued the previous day’s conversation with OCE-1 and sent her a screenshot of the conversation she told OCE-1 about the previous day. The contents of the screenshot show JONES stating “I do not fear it, my protection is not needed here, but from the hellfire / I had told you before, and I stand by this . . . I would rather go and support those that do what/ is right, and die trying to get there, or while I am there, than live in ease here.” After sending the screenshot, JONES told OCE-1 that “Kuduz [sic]” was a good place to look to go. Your affiant believes JONES was referring to Kunduz inside the Kunduz Province, which is on the northern border of Afghanistan and shares a border with Tajikistan.

15. On or about May 2, 2020, OCE-1 gave JONES the contact information for OCE-2 on SMP-2⁶. On or about May 6, 2020, JONES contacted OCE-2 via SMP-2 and told OCE-2 that she did not want to stay in America. OCE-2 told JONES that he facilitates the movement of people.

16. On or about May 10, 2020, JONES spoke with OCE-2 via SMP-2. OCE-2 asked JONES where she wanted to go and Jones said that she and OCE-1 were discussing “Kuduz [sic]” (meaning Kunduz). When JONES was asked by OCE-2 if she supported al Qaeda and their struggle against the kuffar,⁷ she responded affirmatively, “Yes, I do.” After talking about Afghanistan, JONES further stated: “I want to go, and I am aware of the dangers involved in it. But I know its worth it. If I were ever to have a family I couldn’t imagine raising them here. The

⁶ JONES and OCE-2 only communicated on SMP-2.

⁷ *Kuffar* is an Arabic term meaning infidel, disbeliever, or nonbeliever. In the context of al Qaeda supporters, the term commonly refers to any non-believer or non-Muslim.

jobs I do here still feel empty, the 'Muslims' here are often worse than the kuffar we claim to be different from. I don't know what will happen to me there, or what I can do to help. But I want to try, and supporting AQ against the oppressors would be an honour." On that same day, JONES communicated with OCE-1 via SMP-2 and JONES told OCE-1 that she spoke with OCE-2 and asked OCE-1 about her conversation with OCE-2. OCE-1 told Jones that OCE-2 confirmed he was al Qaeda. JONES also made a to-do list for herself and OCE-1, which included "check visa/ update passport (for me at least)/save money/decide city to live in."

17. On or about May 12, 2020, JONES initiated a conversation with OCE-2, and OCE-2 asked JONES how she thought she could help al Qaeda. JONES responded: "Possibly websites, fixing translations, advertising/recruitment, subtitles, even checking official papers? Nasheeds⁸ are a big thing for recruitment, lyrics/subtitles help a lot here. It's hard to find some with English when I first came to these groups."

18. On or about May 18, 2020, OCE-2 told JONES that there was fighting in Afghanistan and that some al Qaeda fighters were killed by the murtadeen⁹ and kuffar so they were planning an istishhadi¹⁰ operation against American soldiers. OCE-2 asked if JONES can help from where she is and if so, may Allah reward her for her efforts. JONES asked how she can help, and OCE-2 told her to pray. JONES responded:

I had at one time thought of acting here, I have base near me. But my power is limited here. My resources and it's reach. Even then the brothers and sisters here would only be negatively impacted by it. They would get more harassment and the ones that aren't strong will go further from Islam from it. But most importantly I fear my reasons. Sometimes it feels selfish. . . . when it can only be for Allah (SwT)

⁸ *Nasheed* refers to a work of vocal music, the material and lyrics of which make reference to Islamic beliefs, history, religion, and current events. Nasheeds are often background music in Islamic extremist ideology videos in order to entice the viewer to support what they are seeing and hearing.

⁹ *Murtadeen* is an Arabic word which means the conscious abandonment of Islam by a Muslim and includes the act of converting to another religion or non-acceptance of faith to be irreligious.

¹⁰ *Istishhadi* is an Arabic word meaning suicide attack used by many jihadist groups.

...

Well I won't lie this world holds nothing for me. I'm ready to go home. It's a reason I'm not scared of this journey. Knowing I may die or be molested on the way even. But I'd rather live one more day fighting for freedom and Islam, then living years as a 'free' captive of the kuffar.

...

I have since known for me it is a last effort here. If I have no other way I may help, I would not hesitate to take that step. But if there is another path I must try that first. Even you are another path for me, another chance.

JONES told OCE-2 that she is not well off for money and that she never had extra money to get "weapons and such." OCE-2 said that if JONES could spare a little that the money would be used to buy weapons to kill Americans. OCE-2 told JONES that compared to America, living is not expensive, but weapons, explosives, armor, and scopes are expensive and they are needed to defend themselves. JONES told OCE-2 that she doesn't know OCE-2 and this could be a trap. OCE-2 responded that OCE-2 doesn't know her either and that she (JONES) comes from a place of non-believers. JONES replied "I can [help], and will but it only would delay us further" but said she will help "if that would be best I can do that." JONES further stated to OCE-2: "The timing is interesting. Since because of coronavirus we all got government money. Free money basically. We would be delayed without it anyway, and it would be most ironic the money from that goes for this . . . They give us free money, and I turn it around on them, yes."

19. On or about May 21, 2020, JONES asked OCE-2 where she should send money to help al Qaeda. OCE-2 responded that they can only get money online. JONES offered to send it through PayPal, but OCE-2 said that a Visa "prepay" card is the safest way to send the money. OCE-2 further told JONES that they (meaning al Qaeda) must attack the kuffar that attack the Muslims and the snipers need scopes for rifles as the American patrols are far away. OCE-2 told JONES this will keep the snipers at a distance and keep the mujahedeen safe. JONES appeared

to research Visa Prepaid cards during this same conversation with OCE-2 and sent OCE-2 screenshots of Visa Prepaid cards. JONES decided to see if she could buy a card at a local store in order to conceal her identity (because buying one online requires the disclosure of personal information). During this same conversation, JONES told OCE-2 that it felt right to her to watch violent jihadist videos and that she had picked her new name for when she arrives in Afghanistan.

20. On or about May 25, 2020, JONES sent OCE-2 screenshots of a \$500 Visa Prepaid card that she purchased at Walmart in order to send money to OCE-2 for al Qaeda and told OCE-2 to register the card. OCE-2 thanked JONES for the money, and JONES told OCE-2, “may it help them to be victorious.”

21. On or about May 26, 2020, OCE-2 sent JONES a picture of a rifle with a scope attached and told her that this is what was purchased with the money she sent. JONES responded, “I wish I had more to give but that’d cut into plans for leaving.” On or about that same day, OCE-2 registered the card which showed an account balance of \$500. Later, the FBI removed the \$500 from the Visa Prepaid card and retained it as evidence.

22. On or about May 27, 2020, JONES told OCE-1 that JONES and OCE-2 had discussed that if she could fly to Dushanbe, Tajikistan, from there they would cross into Afghanistan.

23. On or about June 2, 2020, JONES told OCE-1 that she is going to see her father in Michigan to say goodbye and that the trip would be “like a test flight for later I guess.” JONES posted her flight itinerary, and it showed a round trip ticket for a flight on American Airlines leaving Phoenix on June 19, 2020, and returning on June 22, 2020.

24. On or about June 6, 2020, JONES and OCE-1 decided that JONES will fly to LAX to meet OCE-1 and together they will fly to Dushanbe, Tajikistan through Istanbul, Turkey. JONES and OCE-1 purchased their airline tickets on Turkish Airlines and selected their seats so they would be sitting near each other. JONES also purchased a one way ticket from Phoenix Sky Harbor Airport to LAX leaving at noon on July 21, 2020.

25. On or about June 8, 2020, JONES informed OCE-1 that the Dushanbe Airport in Tajikistan is currently closed. Between June 11, 2020, and June 14, 2020, JONES and OCE-1 discussed other travel options as JONES did not appear to be deterred by the closure of the Dushanbe Airport. On or about June 12, 2020, due to the closure of the Dushanbe Airport, JONES suggested that they might need a new plan.

26. On or about June 13, 2020, JONES told OCE-2 that, due to travel restrictions, she may need to “go [to] other place” and that she can still get to Turkey. OCE-2 advised JONES that many mujahedeen decide to go to Turkey and then to Syria or Yemen. JONES responded, “I could try to get there instead, if I can still get a way to where I need to end up.” JONES and OCE-2 discussed JONES’ travel as well as what group of al Qaeda JONES wants to join if she goes to Syria.

27. On or about June 13, 2020, after talking with OCE-2, JONES said to OCE-1 that they might be able to go to Sham¹¹ (Syria) from Istanbul. On or about June 14, 2020, JONES asked OCE-1, “do you have any place you want go? Cause otherwise Ill just say yes to wherever we can help.” JONES also suggested to OCE-1 that OCE-1 open a cloud account with random emails as it was less traceable and told OCE-1 to wipe her accounts of all discussions about their upcoming plans. She also informed OCE-1 that she received her Turkish e-visa. On

¹¹ *Sham* is the historic Arabic word for Greater Syria. The old name for that region is the Levant.

or about that same day, OCE-2 stated that there are many groups in Sham and asked which group JONES wants to join. JONES responded a “good knowledgeable [sic] brother suggested Tanzim hurras al deen.”¹² OCE-2 asked JONES if she knew they were with al Qaeda and she stated “I assumed as much though tbh I know very little of the specific groups myself.”

28. On or about June 17, 2020, JONES deleted her chat history with OCE-1. She told OCE-1 to do the same. JONES also informed OCE-1 that she booked them a hotel room in Istanbul and sent her a screenshot of the confirmation. On or about June 18, 2020, JONES told OCE-1 to purchase health insurance to further support their cover story that travel is for vacation. JONES sent OCE-1 a link where JONES said she had purchased her health insurance. JONES also requested an airport shuttle service to the hotel in Istanbul and requested OCE-1’s full name for the booking.

29. On or about June 29, 2020, JONES told OCE-1 that JONES will be recruiting for al Qaeda using SMP-1. JONES stated, “I want to do this, and it’s not something so new I’m totally lost in it. I know the people, I know the platform. I’ll need a trillion new accounts and to learn way more about al q and the groups, but not working here and being immersed in it I’m sure will do wonders.” JONES continued to tell OCE-1 the plans she has regarding recruiting and that she will have to make “a ton” of SMP-1 accounts and let those accounts age. Your affiant knows that aging an account would allow an account to look older once an individual was ready to use the account. JONES discussed the weather in Syria with OCE-1 and what JONES is bringing overseas. On or about June 30, 2020, JONES reminded OCE-1 to back up her files on the cloud and wipe all unneeded conversations and even Google search history.

¹² Tanzim hurras al deen is not one of the terrorist organizations that has been designated as an FTO under section 219 of the Immigration and Nationality Act. Your affiant is aware that a member of Tanzim hurras al deen is a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224.

30. On or about July 3, 2020, OCE-2 told JONES that the cost of the route from Turkey to Idlib, Syria is \$750. JONES told OCE-2 about their cover story as tourists, saying goodbye to her father, and how she uploaded her files to a separate account's cloud file, so her accounts would be clean.

31. On July 6, 2020, JONES informed OCE-1 that their flights on Turkish Airlines are not leaving on July 21, 2020, due to COVID-19 restrictions, but that she was still flying to LAX as scheduled and would wait for their overseas flight to leave.

32. On or about July 13, 2020, JONES booked a new flight from Phoenix to LAX to July 22, 2020, and rebooked her flight leaving LAX to Istanbul to July 22, 2020. JONES also canceled her flight from Istanbul to Dushanbe as the airport there is still closed.

33. On or about July 21, 2020, JONES checked in online for her flight leaving for LAX on July 22, 2020:

34. On or about July 22, 2020, JONES traveled to the Phoenix Sky Harbor Airport, checked her luggage, proceeded through a security checkpoint to her departure gate and was subsequently arrested by the FBI.

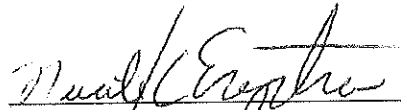
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CONCLUSION

35. Based on the information described above, I respectfully submit there is probable cause to believe that on or about March 4, 2020, through on or about July 22, 2020, that JONES, in the District of Arizona and elsewhere, attempted to provide material support and resources to al Qaeda, a foreign terrorist organization, in violation of 18 U.S.C. § 2339B(a)(1).


Nicole K. Engstrom
FBI Task Force Officer

Sworn to before me telephonically this 23 day of July, 2020


HONORABLE JOHN Z. BOYLE
United States Magistrate Judge