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terrorist organization, knowing that ISIS was a designated foreign terrorist organization and that ISIS engages and has engaged in terrorist activity and terrorism, all in violation of Title 18, United States Code, Sections 2339B(a)(1) and 2.

COUNT TWO: 18 U.S.C. § 842(p)(2)(A) – Distribution of Information Relating to Destructive Devices

The Grand Jury further charges:

EVERITT AARON JAMESON,

defendant herein, as follows:

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On or around December 16, 2017, in Stanislaus County, within the State and Eastern District of California, and elsewhere, defendant EVERITT AARON JAMESON, did knowingly demonstrate the making and use of a "destructive device" as defined in Title 18, United States Code, Section 921(a)(4), and distribute by any means information pertaining to, in whole or in part, the manufacture and use of a "destructive device" as defined in Title 18, United States Code, Section 921(a)(4), with the intent that the information be used for, and in furtherance of, an activity that constitutes a Federal crime of violence, as defined in Title 18, United States Code, Section 16, including bombing of a place of public use, public transportation system, and infrastructure facility, in violation of Title 18, United States Code, Section 2332f, in that the defendant described to a person that he believed was working for a foreign terrorist organization (ISIS) that he was well versed with the Anarchist Cookbook, described how to build destructive devices, to wit, pipe bombs, out of PVC pipe, gunpowder, nails and BB's, described the location where he planned to assemble such destructive devices, asked for remote timing devices from the person that he believed was working for ISIS to use with such destructive devices, and described how to use such destructive devices in an attack on Pier 39 in San Francisco, California to funnel people into area in order to shoot them, all in violation of Title 18, United States Code, Section 842(p)(2)(A).

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A TRUE BILL. /s/ Signature on file w/AUSA

FOREPERSON

KIRK E. SHERRIFF
Assistant United States Attorney
Chief, Fresno Office

KIRK E. SHERRIFF

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