USAO#2024R00780/CAG

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Katharine S. Hayden, U.S.D.J.
v.	:	Crim. No. 26-00276 (KSH)
TOMAS-KAAN JIMENEZ-GUZEL	:	18 U.S.C. § 2339B(a)(1)

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States charges:

Between at least as early as on or about July 24, 2025, through on or about November 4, 2025, in the District of New Jersey and elsewhere, the defendant,

TOMAS-KAAN JIMENEZ-GUZEL,

did knowingly and intentionally conspire and agree with others to provide material support or resources, namely, personnel (to include himself and others), 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).

FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c).

2. The offense charged in this Information is a federal crime of terrorism, as defined in Title 18, United States Code, Section 2332b(g)(5), against the United States, citizens and residents of the United States, and their property. The defendant, TOMAS-KAAN JIMENEZ-GUZEL, was an individual engaged in planning and perpetrating a federal crime of terrorism against the United States, citizens and residents of the United States, and their property.

3. Upon conviction of the Federal crime of terrorism charged in this Information, the defendant,

TOMAS-KAAN JIMENEZ-GUZEL,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c):

(a) all of the defendant TOMAS-KAAN JIMENEZ-GUZEL's assets, foreign and domestic;

(b) all assets, foreign or domestic, acquired or maintained by the defendant TOMAS-KAAN JIMENEZ-GUZEL with the intent and for the purpose of supporting, planning, conducting, or concealing the Federal crime of terrorism charged in this Information; and

(c) all assets, foreign or domestic, derived from, involved in, used, or intended to be used, to commit the Federal crime of terrorism charged in this Information.

SUBSTITUTE ASSETS PROVISION

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

ROBERT FRAZER
United States Attorney

Camila Garces
Assistant U.S. Attorney

Approved by:

Elaine K. Lou
Chief, Criminal Division

CASE NUMBER: 26-cr-00276 (KSH)

United States District Court
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UNITED STATES OF AMERICA

v.

TOMAS-KAAN JIMENEZ-GUZEL

INFORMATION FOR

18 U.S.C. § 2339B(a)(1)

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