B011

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

FILED
OCT 06 2026
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF PA

UNITED STATES OF AMERICA	)	
	)	Criminal No. 26- 213
v.	)	
	)	(18 U.S.C. § 924(h))
JONATHAN HUNTER KRAMER	)	

INDICTMENT

COUNT ONE

The grand jury charges:

On or about September 12, 2026, in the Western District of Pennsylvania, the defendant, JONATHAN HUNTER KRAMER, did knowingly receive a firearm and ammunition, to wit: a Defense Procurement Manufacturing Services (DPMS) Panther Arms semiautomatic rifle, .223 caliber ammunition, and 5.56 caliber ammunition, knowing and having reasonable cause to believe that the firearm and ammunition would be used to commit a felony or a Federal crime of terrorism, including providing, attempting to provide and conspiring to provide material support and resources to the Islamic State of Iraq and al-Sham ("ISIS"), a designated foreign terrorist organization, contrary to Title 18, United States Code, Section 2339B, a felony, and a Federal crime of terrorism.

In violation of Title 18, United States Code, Section 924(h).

FORFEITURE ALLEGATIONS

1. The United States hereby gives notice to the defendant charged in Count One that, upon his conviction of such offense, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which requires any person convicted of this offense to forfeit to the United States of America any and all firearms and ammunition involved in and used in the knowing commission of the offense, including, but not limited to, the following:

a. a Defense Procurement Manufacturing Services (DPMS) Panther Arms semiautomatic rifle, bearing serial number F008809;

b. five (5) rifle magazines;

c. a BSA Contender 4-16 x 50mm rifle scope;

d. .223 and 5.56 caliber ammunition; and

e. a rifle bipod.

2. The United States hereby gives notice to the defendant charged in Count One that, upon his conviction of such offense, the government will seek forfeiture in accordance with Title 18, United States Code, Sections 981(a)(1)(G)(i), (ii), and (iii), and Title 28, United States Code Section 2461(c). The violation of Title 18, United States Code Section 924(h) alleged in Count One of this Indictment involves 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. As part of the commission of a violation of Title 18, United States Code, Section 924(h), the following items were acquired, maintained, involved in, used and intended to be used in the knowing commission of that offense, and are subject to forfeiture:

a. a Defense Procurement Manufacturing Services (DPMS) Panther Arms semiautomatic rifle, bearing serial number F008809;

b. five (5) rifle magazines;

c. a BSA Contender 4-16 x 50mm rifle scope;

d. .223 and 5.56 caliber ammunition;

e. a rifle bipod;

f. a Lenovo Laptop, bearing serial number YVNXB5915004;

g. a cellular phone bearing serial number 7050016026046324;

h. an AIOLO Innovation hard drive bearing serial number AD26B0133W9H;

i. a VISA Debit Gift Card ending in x-6117;

j. approximately $839.00 in cash; and

k. approximately thirty (30) pocketknives.

A True Bill,

FOREPERSON

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