

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** :  
 :  
 **v.** : **CRIMINAL NO. 10-123-02**  
 :  
**JAMIE PAULIN RAMIREZ** :

GOVERNMENT'S CHANGE OF PLEA MEMORANDUM

I. INTRODUCTION

Defendant Jamie Paulin Ramirez has informed the government that she wishes to plead guilty to Count One of the Superseding Indictment in this case, which charges her with conspiracy to provide material support to terrorists, in violation of 18 U.S.C. § 2339A, arising from her involvement in a scheme in 2009 and 2010 to travel to Europe to provide material support and resources to terrorists overseas.

II. MAXIMUM PENALTIES

The Court may impose the following maximum sentence: 15 years imprisonment, three years of supervised release, a \$250,000 fine, and a \$100 special assessment. Further, the defendant's supervised release may be revoked if its terms and conditions are violated, in which case the original term of imprisonment may be increased by up to 3 years.

### III. ELEMENTS OF THE OFFENSES

In order to prove the defendant violated 18 U.S.C. § 2339A (providing material support to terrorists), the government must prove beyond a reasonable doubt that:

1. A statutorily prohibited terrorist activity existed or was prepared for, that is, conspiracy to kill, kidnap, maim, or injure persons or damage property in a foreign country, in violation of 18 U.S.C. § 956;
2. The defendant provided material support or resources or attempted or conspired to do so, and;
3. The defendant knew or intended that the support or resources were to be used to carry out the activity described in the first element.

### IV. FACTUAL BASIS FOR THE PLEA

If this case were to go to trial, the government would be able to prove each element of the offense beyond a reasonable doubt. The government would introduce witness testimony as well as documentary evidence to prove that Jamie Paulin Ramirez participated in the charged conspiracy to provide material support and resources to terrorists, knowing and intending that such material support and resources were to be used in preparation for and in carrying out a conspiracy to kill, kidnap, maim, or injure persons or damage property in a foreign country. To that end, the government would prove every Overt Act listed in the superseding indictment.

The government would also present extensive electronic evidence as well as witness testimony to prove that a conspiracy to kill, kidnap, maim, or injure persons or damage

property in a foreign country existed and was prepared for. For example, in support of this element, the government would present a series of electronic communications dated July 19, 2009, in which the individual referenced in the superseding indictment as CC#2 directed the individual referenced as CC#4 to recruit online “some brothers that can travel freely . . . with eu passports . . . . [A]nd i also need some sisters too.” CC#2 explained that “sister fatima will be in charge of other sister care . . . . [W]e have already organized every thing for her. . . . [W]e are will[ing] to die in order to protect her no matter what the risk is.” CC #2 further stated that the group would train “either with AQIM [Al Qaeda in the Islamic Maghreb] or ISI [Inter-Services Intelligence],” and would be “a professional organised team.”

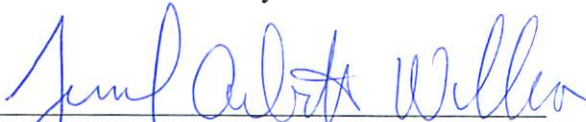
The government would also present electronic communications sent by co-defendant Colleen LaRose (also known as sister Fatima) to defendant Jamie Paulin Ramirez on or about August 1, 2009, that “soon i will be moving to europe to be with other brothers & sisters . . . . when i get to europe, i will send for you to come be with me there . . . . [T]his place will be like a training camp as well as a home.” The government would also present electronic communications from CC#2 dated on or about August 7, 2009, in which CC#2 recruits another individual to find brothers and sisters to go to a “camp for [military-style] training . . . and th[e]n come back to europe to do the job . . . . [T]he job is to [k]nock down some individual[s] that are harming islam.” CC#2 goes on to explain that he is structuring “an ORGANIZATION” divided into a “plan[n]ing team . . . research team . . . action team . . . recruitment team . . . finance team.”

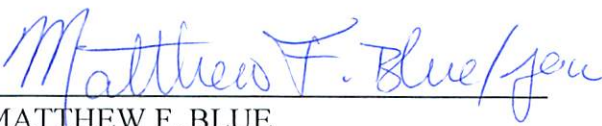
The government would then present electronic evidence, witness testimony, and *Mirandized* admissions by defendant Jamie Paulin Ramirez, to prove that she provided material support or resources and attempted and conspired to do so, and that she knew or intended that the

support or resources were to be used to carry out the aforementioned conspiracy. More specifically, the government would present electronic evidence, witness testimony, and the defendant's *Mirandized* admissions to prove that she knew CC#2 was participating in a conspiracy to kill, kidnap, maim, or injure persons or damage property in a foreign country. The government would further prove that, while she was living in the United States, Ramirez decided to travel to Ireland to join CC#2 and his conspiracy. The government would present airline documentation, electronic evidence, and witness testimony to prove that Ramirez traveled to Ireland on September 12, 2009, and that she married CC #2 in an Islamic ceremony the following day, knowing and intending that her presence in Europe, her marriage to CC#2, and her future actions would provide support for the conspiracy.

Respectfully submitted,

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United States Attorney

  
JENNIFER ARBITTIER WILLIAMS  
Assistant United States Attorney


  
MATTHEW F. BLUE  
Trial Attorney  
Counterterrorism Section  
U.S. Department of Justice

Dated: March 4, 2011

CERTIFICATE OF SERVICE

I certify that a copy of the Government's Change of Plea Memorandum was served by email on the following defense counsel:

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Date: March 4, 2011