

AUG 23 2021

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA )

NO. 2:19-cr-00013

NT  
DEPUTY CLERK

v. )

18 U.S.C. § 1512(c)(1)

18 U.S.C. § 1519

18 U.S.C. § 2339B(a)(1)

GEORGIANNA A.M. GIAMPIETRO )

Chief Judge Crenshaw

**SECOND SUPERSEDING INDICTMENT**

COUNT ONE

THE GRAND JURY CHARGES:

Between on or about November 24, 2017, and on or about October 23, 2018, in the Middle District of Tennessee and elsewhere, **GEORGIANNA A.M. GIAMPIETRO**, a national of the United States, did knowingly attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), to wit: personnel and services, to Hay'at Tahrir, also known as Hay'et Tahrir al-Sham, also known as Hayat Tahrir al-Sham, also known as HTS, aliases for Al-Nusrah Front, which at all times relevant to this indictment was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that the organization was a designated foreign terrorist organization and knowing that the organization had engaged in, and engages in, terrorist activity and terrorism.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

Beginning in or about May 2018, and continuing through in or about June 2018, in the Middle District of Tennessee and elsewhere, **GEORGIANNA A.M. GIAMPIETRO**, a national of the United States, did knowingly attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), to wit: currency, to Hay'at Tahrir, also known as Hay'et Tahrir al-Sham, also known as Hayat Tahrir al-Sham, also known as HTS, aliases for Al-Nusrah Front, which at all times relevant to this indictment was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that the organization was a designated foreign terrorist organization and knowing that the organization had engaged in, and engages in, terrorist activity and terrorism.

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

COUNT THREE

Beginning in or about March 2018, and continuing until on or about October 23, 2018, in the Middle District of Tennessee, **GEORGIANNA A.M. GIAMPIETRO**, did knowingly alter, destroy, conceal, and cover up a record and document, including, but not limited to, social media accounts, text messages, chat conversations, and other electronic communications, with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of a department and agency of the United States, that is, a possible violation of Title 18, United States Code, Section 2339B(a)(1), a matter within the jurisdiction of the Federal Bureau of Investigation, and in relation to and in contemplation of such matter.

In violation of Title 18, United States Code, Section 1519.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

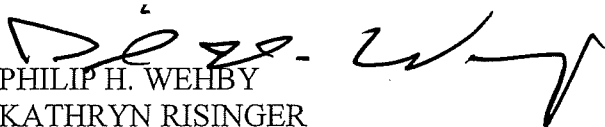
Between on or about September 23, 2018, and on or about October 23, 2018, in the Middle District of Tennessee, **GEORGIANNA A.M. GIAMPIETRO**, knowingly and corruptly did alter, destroy, and conceal a record and document, including, but not limited to, contact information, text messages, electronic communications, and a cell phone, and corruptly did attempt to do so, with the intent to impair the record and document's integrity and availability for use in an official proceeding, namely, a grand jury investigation into a possible violation of Title 18, United States Code, Section 2339B(a)(1).

In violation of Title 18, United States Code, Section 1512(c)(1).

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

MARY JANE STEWART  
ACTING UNITED STATES ATTORNEY

  
PHILIP H. WEHBY  
KATHRYN RISINGER  
Assistant United States Attorneys  
JENNIFER LEVY  
Trial Attorney – Department of Justice

CRIMINAL COVER SHEET  
MIDDLE DISTRICT OF TENNESSEE  
DIVISION

Indictment (x)  
Complaint ( )  
Information ( )  
Felony (x)  
Misdemeanor ( )  
Juvenile ( )

County of Offense: White  
AUSA's NAME: Wehby/Risinger/Levy  
Reviewed by AUSA: [Signature]  
(Initials)

GEORGIANNA A.M. GIAMPIETRO  
Defendant's Full Name

Defendant's Address

Peter Strianse/Charles Swift  
Defendant's Attorney

Interpreter Needed? Yes  No   
If Yes, what language? \_\_\_\_\_

COUNT(S)	TITLE/SECTION	OFFENSE CHARGED	MAX. PRISON (plus any mandatory minimum)	MAX. FINE
1-2	18 USC 2339B(a)(1) \	ATTEMPT TO PROVIDE MATERIAL SUPPORT TO A DESIGNATED FOREIGN TERRORIST ORGANIZATION	20 YRS	\$ 250,000
3	18 USC 1519	DESTRUCTION, ALTERATION, OR FALSIFICATION OF RECORDS IN FEDERAL INVESTIGATIONS AND BANKRUPTCY	20 YRS	\$250,000
4	18 USC 1512(c)(1)	TAMPERING AND ATTEMPTING TO TAMPER WITH RECORDS AND DOCUMENTS FOR USE IN OFFICIAL PROCEEDING	20 YRS	\$250,000

\*If the defendant is found to be an Armed Career Criminal, pursuant to 18 U.S.C. § 924(e), defendant will be subject to a term of imprisonment of between 15 years to life.

\*\*A charge pursuant to 8 U.S.C. § 1326, may carry a maximum sentence of one of the following: (1) up to 2 years; (2) up to 10 years; or (3) up to 20 years, depending upon a defendant's criminal and removal history.

Is the defendant currently in custody? Yes (x) No ( ) If yes, State or Federal? Writ requested ( )

Has a complaint been filed? Yes ( ) No (x)  
If Yes: Name of the Magistrate Judge \_\_\_\_\_ Case No.: \_\_\_\_\_  
Was the defendant arrested on the complaint? Yes ( ) No ( )

Has a search warrant been issued? Yes (x) No ( )  
If Yes: Name of the Magistrate Judge Newbern Case No.: \_\_\_\_\_

Was bond set by Magistrate/District Judge? Yes ( ) No (x) Amount of bond: \_\_\_\_\_

Is this a Rule 20? Yes ( ) No (x) To/from what district? \_\_\_\_\_  
Is this a Rule 40? Yes ( ) No (x) To/from what district? \_\_\_\_\_

Estimated trial time: 2 weeks

The Clerk will issue a **Summons/Warrant** (circle one) (Note: If information, request for a warrant requires presentment of a sworn affidavit of probable cause to a judicial officer, who will determine whether to issue a warrant)

Detention requested: Yes (x) No ( ) Recommended conditions of release: N/A – Defendant previously detained by the Court following a hearing