

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JIMIL PARMAR

CASE NUMBER:
~~UNDER SEAL~~

25 CR 197

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. In or about July 2023, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant(s) violated:

*Code Section*Title 18, United States Code, Section
876(e)*Offense Description*

Mailing threatening communications

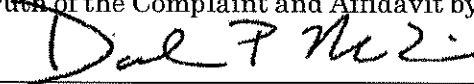
This criminal complaint is based upon these facts:

☒ Continued on the attached sheet.Douglas J. Berndt (DPM w/ permission)

DOUGLAS J. BERNDT

Special Agent, Federal Bureau of Investigation
(FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: April 14, 2025*Judge's signature*City and state: Chicago, IllinoisDANIEL P. MCLAUGHLIN, U.S. Magistrate Judge*Printed name and title***FILED**

APR 14 2025

MAGISTRATE JUDGE DANIEL P. MCLAUGHLIN
United States District Court

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, DOUGLAS J. BERNDT, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so since 2012. I am currently assigned to the FBI Chicago Field Office. Prior to being employed as a Special Agent, I served as an Investigator with the U.S. Department of Labor and worked in the private sector as an attorney. As a Special Agent, I have participated in terrorism, violent crime, and financial fraud investigations, at the federal level.

2. This affidavit is submitted in support of a criminal complaint alleging that JIMIL PARMAR has violated Title 18, United States Code, Section 876(c), namely that defendant mailed a communication containing a threat to injure. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging PARMAR with mailing threatening communications, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, and my training and experience.

I. FACTS SUPPORTING PROBABLE CAUSE

A. Summary

3. On July 12, 2023, a letter was mailed and later received by the Sant Nirankari Mission¹ located in the western suburbs of Chicago (the “Illinois Sant Nirankari Mission”). The letter threatened an attack during the visit of the Mission’s spiritual leader. The letter was sent in an envelope postmarked by the United States Postal Service in Atlanta, Georgia. On July 12, 2023, an identical letter was mailed and later received the Sant Nirankari Mission located in the suburbs of Atlanta (the “Georgia Sant Nirankari Mission”). Identical letters were sent to at least three other Missions in the United States. Forensic analysis of the letter and envelope sent to the Georgia Mission identified JIMIL PARMAR’s fingerprint on the envelope. Further analysis revealed PARMAR’s DNA on the envelope sent to the Chicago Mission and on the envelope sent to the Georgia Mission. Accordingly, and as described further below, there is probable cause to believe that PARMAR mailed threatening communications, in violation of Title 18, United States Code, Section 876(c).

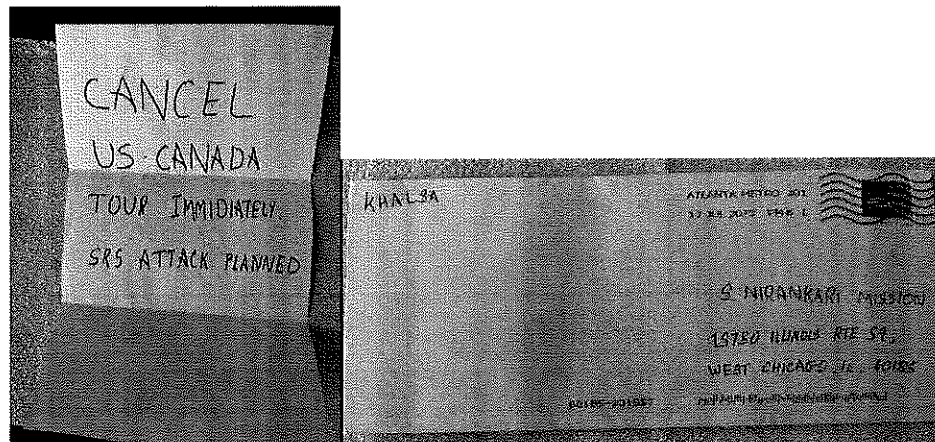
B. Multiple Sant Nirankari Missions in the United States Received Threatening Letters in July 2023.

4. The Sant Nirankari is a spiritual organization, originating in the Sikh religion, and based in Delhi, India. It has missions located throughout the United States, Canada, and other countries. The Global Spiritual Leader of the Sant

¹ The Sant Nirankari is a spiritual organization, originating in the Sikh religion, and based in Delhi, India. It has missions located throughout the United States, Canada, and other countries.

Nirankari Mission is Satguru Mata Sudiksha Ji Maharaj (Satguru). Satguru toured North America from July 26, 2023 through approximately September 4, 2023. The United States tour included events in Chicago, Washington, DC, New York NY, Atlanta, GA, Houston, TX, Los Angeles, CA, Phoenix, AR, and outside San Francisco, CA. The Canadian tour included events in Abbotsford, Victoria, Vancouver, Kamloops, Edmonton, Calgary, and Toronto. According to the Sant Nirankari Mission, a private security firm was hired to handle security for all these events.

5. In or about July 2023, the Illinois Sant Nirankari Mission, located on Route 59 in West Chicago, IL 60185, received a letter threatening an attack. The letter's envelope was postmarked by the U.S. Postal Service, "ATLANTA METRO, 12 JUL 2023 PM 6 L". The envelope was mailed using a 2019 United States flag stamp with the caption, "FOREVER / USA". On the sender line of the letter envelope was handwritten "KHALSA". Within the envelope was a single sheet of white printer paper with the words, "CANCEL US-CANADA TOUR IMMEDIATELY. SRS ATTACK PLANNED". Based on my training and experience and conversations with leaders of the Illinois Sant Nirankari Mission, I understand the "US-CANADA TOUR" to refer to Satguru's 2023 North American Tour. The words appeared to be hand-written and printed onto the sheet of paper, likely a copy from a handwritten original using a copier machine.



6. Upon further investigation, the FBI discovered that in or about July 2023, just before the Satguru's North American tour, at least four other Sant Nirankari Missions including in the Bay Area of California, the Los Angeles, California area, the Washington, D.C. area, and the Atlanta, Georgia area, had received what appeared to be identical letters in the mail that contained the words, "CANCEL US-CANADA TOUR IMMEDIATELY. SRS ATTACK PLANNED". The letters also appeared to be printed copies, likely of the same handwritten original. All of the letters also contained handwriting in black ink in the sender line, "KHALSA".

7. According to leaders of the Mission, the return address on the letter "KHALSA" is a reference to a different religious group that split from the Sant Nirankari Mission in the mid-20th century. According to Mission leaders, a member of Khalsa was responsible for the assassination in 1980 of the Sant Nirankari Mission's global spiritual leader in India, who was Satguru's grandfather.

8. The letter received by Georgia Sant Nirankari Mission was sent to the FBI Laboratory in Quantico, Virginia for forensic analyses. The results indicated a fingerprint on the exterior of the letter envelope identified to PARMAR.

9. On May 22, 2024, the FBI interviewed PARMAR at the State Department office inside the Sam Nunn Building. During the interview, PARMAR stated that he lived with “a friend”, later identified as Individual MM². PARMAR stated that he was familiar with the Nirankari Mission and that he went there on and off and stated that he met Satguru. PARMAR stated that he followed the Mission’s spiritual beliefs. PARMAR stated “my friend [Individual MM] and I both go there”. PARMAR said that he was not familiar with Khalsa, but stated “I knew a guru of Nirankari was killed by some Punjabi community”. PARMAR denied being involved with the letter. PARMAR stated he was familiar with the Satguru’s U.S. – Canada tour and attended tour events in Atlanta and Chicago. PARMAR stated that he noticed that the Satguru had heightened security, 5-8 security people, at the event in Chicago. PARMAR was shown the letter sent to the Chicago Mission and was asked if he agreed that the recipient of the letter would perceive it as a threat. He stated “of course, of course.” PARMAR agreed the abbreviation “SRS” in the letter probably meant “serious”.

10. PARMAR stated, that in July 2023, he worked the front desk at a hotel in Union City, Georgia and handled mail. PARMAR said he may have touched the

² The FBI also interviewed Individual JS, who at the time of the interview, was PARMAR’s legal spouse. According to Individual JS, they were going through a divorce.

letter in that capacity. During the interview, PARMAR provided a writing sample. After providing the writing sample he stated, "If I wrote this letter [the threat letter], I would make sure that I don't write as you know I normally do write it." An examination of the threat letter by the FBI Laboratory comparing the letter to PARMAR's handwriting sample provided in person was inconclusive.

11. During the interview, PARMAR stated he was in Chicago for five days for leisure during the Chicago stop of the Satguru's tour and went to see the Satguru. According to a representative of the Illinois Sant Nirankari Mission, PARMAR had traveled to the metro Chicago area to be married to Individual MM during a wedding ceremony hosted by the Satguru, held on approximately July 22, 2023. Individual MM's brother arranged for the couple to take part in the wedding ceremony. According to Illinois Sant Nirankari Mission representative, on July 22, 2023, PARMAR was still married to Individual JS.

12. During the interview with the FBI, PARMAR stated he bought a 9mm handgun in December 2023 after someone threw a rock through his car window. PARMAR stated that he thought Individual JS did it. According to Individual JS, sometime in June 2023, PARMAR came to Individual JS's workplace. Individual JS met PARMAR in the parking lot at approximately noon that day. According to Individual JS, PARMAR brought a pistol and claimed he just wanted to shoot Individual JS and himself. Individual JS was afraid but was able to calm him down. Individual JS stated that PARMAR found the pistol at the hotel where he worked

after someone left it in a room. Individual JS described it as a shiny black gun with a brown handle and a long barrel.

13. PARMAR was told that if his DNA was found on the letter flap, it would indicate that he licked the letter and was involved. PARMAR denied being involved with sending the letter. PARMAR voluntarily consented to providing a DNA sample, and did so during the May 22, 2024 in-person interview with the FBI.

14. Forensic analysis of the letter sent to the Illinois Sant Nirankari Mission confirmed that it was 19 octillion times more likely that PARMAR's DNA was in the sample taken from the inside envelope flap seal than not. Forensic analysis of the letter sent to the Georgia Sant Nirankari Mission confirmed that it was 15 octillion times more likely that PARMAR's DNA was in the sample taken from the inside envelope flap seal than not. Based on my training and experience, this indicates that he was involved with sending the letter.

15. The letter mailed to the Illinois Sant Nirankari Mission was postmarked July 12, 2023 from the Atlanta metro area where PARMAR resided and worked at the time. The letter mailed to the Georgia Sant Nirankari Mission was postmarked July 12, 2023 from the Atlanta metro area where PARMAR resided and worked at the time. Additional letters were delivered by the USPS to locations in California and Virginia.

16. PARMAR, according to Individual JS, possessed a firearm prior to the mailing of the letters containing threats. PARMAR then subsequently traveled to see the Satguru in person, in both Atlanta and Chicago.

FURTHER AFFIANT SAYETH NOT.

Douglas J. Berndt (DPM w/ permission)

DOUGLAS J. BERNDT
Special Agent, Federal Bureau of
Investigation

SWORN TO AND AFFIRMED by telephone April 14, 2025.

Daniel P. McLaughlin

Honorable DANIEL P. MCLAUGHLIN
United States Magistrate Judge