

FILED by **NF** D.C.

Jul 19, 2018

STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
18-20613-CR-WILLIAMS/TORRES
CASE NO:**

**18 U.S.C. § 842(p)(2)(A)
18 U.S.C. § 2339B(a)(1)
18 U.S.C. § 2339A(a)**

UNITED STATES OF AMERICA

vs.

**SAMUEL BAPTISTE,
a/k/a "Khilafahaiti,"
a/k/a "Abdul Jalil Rashid Imarah,"
a/k/a "Jihadi gear(Private),"**

Defendant.

INDICTMENT

The Grand Jury charges:

COUNT 1

**Distributing Information
Pertaining to Explosives
(18 U.S.C. § 842(p)(2)(A))**

On or about November 6, 2016, in Miami-Dade County, in the Southern District of Florida, the defendant,

**SAMUEL BAPTISTE,
a/k/a "Khilafahaiti,"
a/k/a "Abdul Jalil Rashid Imarah,"
a/k/a "Jihadi gear(Private),"**

did knowingly distribute by any means information pertaining to, in whole or in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, that is, a document titled "Instructions: How to Make a Homemade Pipe Bomb," with the intent that the information be used for, and in furtherance of, an activity that constitutes a Federal crime of

violence, that is, using a weapon of mass destruction, in violation of Title 18, United States Code, Section 2332a(a); all in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 844(a)(2).

COUNT 2

**Distributing Information
Pertaining to Explosives
(18 U.S.C. § 842(p)(2)(A))**

On or about November 6, 2016, in Miami-Dade County, in the Southern District of Florida, the defendant,

**SAMUEL BAPTISTE,
a/k/a "Khilafahaiti,"
a/k/a "Abdul Jalil Rashid Imarah,"
a/k/a "Jihadi gear(Private),"**

did knowingly distribute by any means information pertaining to, in whole or in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, that is, a document titled "Pipe Bombs," with the intent that the information be used for, and in furtherance of, an activity that constitutes a Federal crime of violence, that is, using a weapon of mass destruction, in violation of Title 18, United States Code, Section 2332a(a); all in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 844(a)(2).

COUNT 3

**Distributing Information
Pertaining to Explosives
(18 U.S.C. § 842(p)(2)(A))**

On or about November 6, 2016, in Miami-Dade County, in the Southern District of Florida, the defendant,

**SAMUEL BAPTISTE,
a/k/a "Khilafahaiti,"
a/k/a "Abdul Jalil Rashid Imarah,"
a/k/a "Jihadi gear(Private),"**

did knowingly distribute by any means information pertaining to, in whole or in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, that is, a document titled "Improvised Explosive Devices," with the intent that the information be used for, and in furtherance of, an activity that constitutes a Federal crime of violence, that is, using a weapon of mass destruction, in violation of Title 18, United States Code, Section 2332a(a); all in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 844(a)(2).

COUNT 4
Distributing Information
Pertaining to Explosives
(18 U.S.C. § 842(p)(2)(A))

On or about November 6, 2016, in Miami-Dade County, in the Southern District of Florida, the defendant,

SAMUEL BAPTISTE,
a/k/a "Khilafahaiti,"
a/k/a "Abdul Jalil Rashid Imarah,"
a/k/a "Jihadi gear(Private),"

did knowingly distribute by any means information pertaining to, in whole or in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, that is, a document titled "Improvised Munitions Black Book, Volume 1," with the intent that the information be used for, and in furtherance of, an activity that constitutes a Federal crime of violence, that is, using a weapon of mass destruction, in violation of Title 18, United States Code, Section 2332a(a); all in violation of Title 18, United States Code, Sections 842(p)(2)(A) and 844(a)(2).

COUNT 5

**Attempting to Provide Material
Support to a Foreign Terrorist Organization
(Islamic State of Iraq and al-Sham)
(18 U.S.C. § 2339B(a)(1))**

On or about November 6, 2016, in Miami-Dade County, in the Southern District of Florida, the defendant,

**SAMUEL BAPTISTE,
a/k/a "Khilafahaiti,"
a/k/a "Abdul Jalil Rashid Imarah,"
a/k/a "Jihadi gear(Private),"**

did knowingly attempt to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), including services and personnel, as alleged in Counts 1-4 of this Indictment, to a foreign terrorist organization, that is, the Islamic State of Iraq and al-Sham ("ISIS"), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act ("INA"), knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), in violation of Title 18, United States Code, Sections 2339B(a)(1) and 2.

COUNT 6

**Attempting to Provide Material
Support to Terrorists
(18 U.S.C. § 2339A(a))**

On or about November 6, 2016, in Miami-Dade County, in the Southern District of Florida, the defendant,

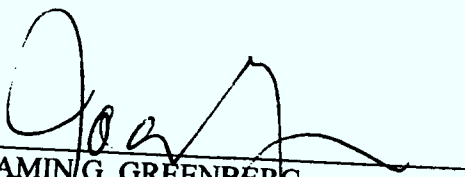
**SAMUEL BAPTISTE,
a/k/a "Khilafahaiti,"**

a/k/a "Abdul Jalil Rashid Imarah,"
a/k/a "Jihadi gear(Private),"

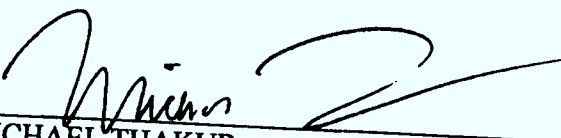
did knowingly attempt to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), including services and personnel, as alleged in Counts 1-4 of this Indictment, knowing and intending that the material support and resources were to be used in preparation for and in carrying out violations of Title 18, United States Code, Section 2332a(a) (use, without lawful authority, of a weapon of mass destruction), in violation of Title 18, United States Code, Sections 2339A(a) and 2.

A TRUE BILL

FOREPERSON JV


BENJAMIN G. GREENBERG
UNITED STATES ATTORNEY


MARC S. ANTON
ASSISTANT UNITED STATES ATTORNEY


MICHAEL THAKUR
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Samuel Baptiste, a/k/a "Khilafahaiti," a/k/a "Abdul Jalil Rashid
Imarah," a/k/a "Jihadi gear(Private)"

Case No: _____

Counts #: 1-4

Distributing Information Pertaining to Explosives

Title 18, United States Code, Section 842(p)(2)(A)

*Max. Penalty: 20 Years' Imprisonment

Count #: 5

Attempting to Provide Material Support to a Foreign Terrorist Organization

Title 18, United States Code, Section 2339B(a)(1)

* Max. Penalty: 20 Years' Imprisonment

Count #:6

Attempting to Provide Material Support to Terrorists

Title 18, United States Code, Section 2339A(a)

*Max. Penalty: 15 Years' Imprisonment

Count #:

*Max. Penalty:

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

v.

SAMUEL BAPTISTE,
a/k/a "Khilafahaiti,"
a/k/a "Abdul Jalil Rashid Imarah,"
a/k/a "Jihadi gear(Private),"

Defendant.

CASE NO. _____

CERTIFICATE OF TRIAL ATTORNEY*

Court Division: (Select One)

☒ Miami ☐ Key West
☐ FTL ☐ WPB ☐ FTP

Superseding Case Information:

New Defendant(s) Yes _____ No _____
Number of New Defendants _____
Total number of counts _____

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

- Interpreter: (Yes or No) ☒ Yes
List language and/or dialect Creole

- This case will take 5 days for the parties to try.

- Please check appropriate category and type of offense listed below:

(Check only one)

- I 0 to 5 days
II 6 to 10 days
III 11 to 20 days
IV 21 to 60 days
V 61 days and over

(Check only one)

- ☒ Petty
____ Minor
____ Misdem.
____ Felony ☒

- Has this case been previously filed in this District Court? (Yes or No) No

If yes:

Judge:

(Attach copy of dispositive order)

Case No. _____

Has a complaint been filed in this matter?

(Yes or No) No

If yes:

Magistrate Case No. _____

Related Miscellaneous numbers: _____

Defendant(s) in federal custody as of 11/9/2016

Defendant(s) in state custody as of _____

Rule 20 from the District of _____

Is this a potential death penalty case? (Yes or No) No

- Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? Yes _____ No X

- Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? Yes _____ No X

Marc S. Anton
MARC S. ANTON
ASSISTANT UNITED STATES ATTORNEY
FL Bar No. 148369