

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
 :
 - v. - :
 :
 COLE JAMES BRIDGES, :
 a/k/a "Cole Gonzales," :
 :
 Defendant. :
----- X

INDICTMENT

21 Cr.

21 CRIM 065

COUNT ONE

(Attempted Provision of Material Support to a Designated Foreign Terrorist Organization)

The Grand Jury charges:

1. From at least in or about August 2020, up to and including in or about January 2021, in the Southern District of New York and elsewhere, COLE JAMES BRIDGES, a/k/a "Cole Gonzales," the defendant, knowingly attempted to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), to a foreign terrorist organization, to wit, the Islamic State of Iraq and al-Sham ("ISIS"), which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act ("INA"), and is currently designated as such as of the date of the filing of this Indictment, including, among other things, training, services, and personnel, knowing that ISIS is 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).

(Title 18, United States Code, Sections 2339B and 2.)

COUNT TWO
(Attempted Murder of U.S. Military Service Members)

The Grand Jury further charges:

2. From at least in or about August 2020, up to and including in or about January 2021, in the Southern District of New York and elsewhere, COLE JAMES BRIDGES, a/k/a "Cole Gonzales," the defendant, knowingly attempted to kill an officer and employee of the United States -- which killing would be murder as defined in Title 18, United States Code, Section 1111(a) -- including any member of the uniformed services, while such officer and employee was engaged in and on account of the performance of official duties, and any person assisting such an officer and employee in the performance of such duties and on account of that assistance, to wit, BRIDGES attempted to provide military tactical training and advice to ISIS to facilitate the

efforts of ISIS fighters to attack U.S. troops and kill American soldiers in the Middle East.

(Title 18, United States Code, Sections 1114 and 2.)

FORFEITURE ALLEGATIONS

3. As a result of planning and perpetrating Federal crimes of terrorism against the United States, as defined in Title 18, United States Code, Section 2332b(g)(5), and as alleged in Counts One and Two of this Indictment, COLE JAMES BRIDGES, a/k/a "Cole Gonzales," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461:

a. All right, title, and interest in all assets, foreign and domestic;

b. All right, title, and interest in all assets, foreign and domestic, acquired and maintained with the intent and for the purpose of supporting, planning, conducting, and concealing a Federal crime of terrorism against the United States, citizens and residents of the United States, and their property; and

c. All right, title, and interest in all assets, foreign and domestic, derived from, involved in, and used and intended to be used to commit a Federal crime of

terrorism against the United States, citizens and residents of the United States, and their property; including but not limited to a sum of money representing the value of the property described above as being subject to forfeiture.

Substitute Assets Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of COLE JAMES BRIDGES, a/k/a "Cole Gonzales," the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461, to seek forfeiture of any

other property of the defendant up to the value of the above
forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(G) and
2332b(g)(5); and Title 28, United States Code, Section 2461.)



FOREPERSON



AUDREY STRAUSS
United States Attorney

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INDICTMENT

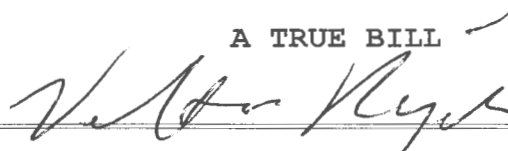
21 Cr.

(Title 18, United States Code,
Sections 1114, 2339B, and 2.)

AUDREY STRAUSS

United States Attorney

A TRUE BILL


Foreperson.

Wheel B: J. Liman /  2/3/2021