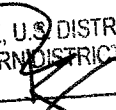


FILED

OCT 14 2020

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY  DEPUTY

UNITED STATES OF AMERICA

§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§

Cause No.:

**INDICTMENT
SA20CR0488OG**

v.

**KRISTOPHER SEAN MATTHEWS (1),
a/k/a ALI JIBREEL, and
JAYLYN CHRISTOPHER MOLINA (2),
a/k/a ABDUR RAHIM.**

**COUNT ONE: (18 U.S.C. § 2339B
Conspiracy to Provide Material Support
to a Designated Foreign Terrorist
Organization);
COUNT TWO: (18 U.S.C. §§ 2339B, 2
Providing Material Support to a
Designated Foreign Terrorist
Organization, Aid and Abet);**

THE GRAND JURY CHARGES:

**COUNT ONE
[18 U.S.C. § 2339B]**

**CONSPIRACY TO PROVIDE MATERIAL SUPPORT TO
A DESIGNATED FOREIGN TERRORIST ORGANIZATION**

On or about October 15, 2004, the United States Secretary of State designated al- Qaeda in Iraq (hereinafter “AQI”), then known as Jam’at al Tawhid wa’al-Jihad, as a foreign terrorist organization, (FTO) under Section 219 of the INA and as a Specially Designated Global Terrorist under Section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA and as a Specially Designated Global Terrorist entity under Section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary also added the

following aliases to the FTO listing: the Islamic State of Iraq and al- Sham (“ISIS”), which is how the organization will be referenced herein), the Islamic State of Iraq and Syria (“ISIS”), ad-Dawla al Islamiyya fi al-‘Iraq wa-sh’Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On or about September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

From in or about May 2019, to on or about September 18, 2020, in the Western District of Texas, the District of South Carolina, and elsewhere, the Defendants,

**KRISTOPHER SEAN MATTHEWS, a/k/a ALI JIBREEL, and
JAYLYN CHRISTOPHER MOLINA, a/k/a ABDUR RAHIM,**

and others (hereinafter referred to as "the members of the conspiracy"), did knowingly and willfully combine, conspire, confederate and agree with each other, to provide and attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including the following tangible and intangible property: services and personnel, that is themselves, to a foreign terrorist organization, namely, ISIS, which at all relevant times was designated by the United States Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, 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 Immigration and Nationality Act), 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).

All in violation of Title 18, United States Code, Section 2339B.

COUNT TWO
[18 U.S.C. §§ 2339B, 2]

PROVIDING AND ATTEMPTING TO PROVIDE MATERIAL SUPPORT TO
A DESIGNATED FOREIGN TERRORIST ORGANIZATION

From in or about May 2019, to on or about September 18, 2020, in the Western District of Texas, the District of South Carolina, and elsewhere, the Defendants,

KRISTOPHER SEAN MATTHEWS, a/k/a ALI JIBREEL, and
JAYLYN CHRISTOPHER MOLINA, a/k/a ABDUR RAHIM,

aided and abetted by each other, did knowingly provide and attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including the following tangible and intangible property: services and personnel, that is themselves, to a foreign terrorist organization, namely, ISIS, which at all relevant times was designated by the United States Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, 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 Immigration and Nationality Act), 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).


All in violation of Title 18, United States Code, Sections 2339B and 2.

A TRUE BILL




FOREPERSON

GREGG N. SOFER
United States Attorney


MARK ROOMBERG
Assistant United States Attorney


ERIC FUCHS
Assistant United States Attorney


WILLIAM R. HARRIS
Assistant United States Attorney