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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
October 2018 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,
v.
MARK STEVEN DOMINGO,
Defendant.

CR 19-00313-MWF

I N D I C T M E N T

[18 U.S.C. § 2339A: Providing Material Support to Terrorists; 18 U.S.C. § 2332a(a)(2): Attempted Use of a Weapon of Mass Destruction]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 2339A]

Beginning on or about April 22, 2019 and continuing through April 26, 2019, in Los Angeles County, within the Central District of California, defendant MARK STEVEN DOMINGO provided material support and resources in the form of tangible property and personnel, namely himself, intending that such material support and resources be used in preparation for and in carrying out a violation of Title 18,

1 United States Code, Section 2332a(a)(2) (Use of a Weapon of Mass
2 Destruction).

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COUNT TWO

[18 U.S.C. § 2332a(a)(2)]

Beginning on or about April 22, 2019 and continuing through April 26, 2019, in Los Angeles County, within the Central District of California, defendant MARK STEVEN DOMINGO attempted to use a weapon of mass destruction, specifically a destructive device or explosive bomb, against a person or property within the United States, namely to attack a rally at a park in Long Beach, California, using the mail or a facility of interstate commerce in furtherance of the offense, against property that is used in interstate or foreign commerce, and the offense, or the results of the offense, would have affected interstate commerce.

A TRUE BILL

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Foreperson

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