

IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

**JULY 2023 GRAND JURY
(Impaneled July 28, 2023)**

THE UNITED STATES OF AMERICA

INDICTMENT

-vs-

Violations:

HADI MATAR

Title 18, United States Code,
Sections 2339B(a)(1), 2332b(a)(1)(A),
2332b(a)(2), 2332b(b)(1)(A),
2332b(b)(1)(B), 2332b(c)(1)(A),
2332b(c)(1)(F), and 2339A.
(3 Counts and 1 Forfeiture Allegation)

COUNT 1

(Attempt to Provide Material Support to a Foreign Terrorist Organization)

The Grand Jury Charges That:

Between in or about September 2020, the exact date being unknown, and on or about August 12, 2022, in the Western District of New York, and elsewhere, the defendant, HADI MATAR, a citizen of the United States, knowingly did attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), that is, personnel, specifically himself, and services, to a designated foreign terrorist organization, namely, Hizballah, knowing that Hizballah was a designated foreign terrorist organization, and had engaged, and was engaging, in terrorist activity, as that term is defined in Title 8,

United States Code, Section 1182(a)(3)(B), and had engaged, and was engaging, in terrorism, as that term is defined in Title 22, United States Code, Section 2656f(d)(2).

All in violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT 2

(Act of Terrorism Transcending National Boundaries)

The Grand Jury Further Charges That:

Between in or about February 2006, the exact date being unknown, and on or about August 12, 2022, in the Western District of New York, and elsewhere, and involving conduct transcending national boundaries, the defendant, HADI MATAR, did knowingly attempt to kill, and did knowingly maim, commit an assault resulting in serious bodily injury, and assault with a dangerous weapon, a person within the United States, that is, Victim 1, a person known to the Grand Jury, in violation of the laws of the State of New York, that is, New York Penal Law §§ 110-125.25(1) and § 120.10(1)-(3), and in which a facility of interstate and foreign commerce was used in furtherance of the offense and which obstructed, delayed, and affected interstate commerce.

All in violation of Title 18, United States Code, Sections 2332b(a)(1)(A), 2332b(a)(2), 2332b(b)(1)(A), 2332b(b)(1)(B), 2332b(c)(1)(A), and 2332b(c)(1)(F).

COUNT 3

(Providing Material Support to Terrorists)

The Grand Jury Further Charges That:

Between in or about September 2020, the exact date being unknown, and on or about August 12, 2022, in the Western District of New York, and elsewhere, the defendant, HADI MATAR, did provide, and did attempt to provide, material support and resources, that is, personnel, specifically himself, and services, knowing and intending they were to be used in preparation for and in carrying out a violation of Title 18, United States Code, Section 2332b(a)(1)(A).

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

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

Upon conviction of any of the offenses alleged in this Indictment, the defendant, HADI MATAR, shall forfeit to the United States any asset derived from, involved in, or used or intended to be used to commit any federal crime of terrorism against the United States, including, but not limited to the following seized by law enforcement on or about August 13, 2022, from 417 Morningside Ave, Fairview, New Jersey, unless otherwise stated below:

ELECTRONICS:

- a. One Flash memory (SD/Compact Flash/Etc.), SanDisk Ultra, BN21328000937G;
- b. One Flash memory (SD/Compact Flash/Etc.), SanDisk Ultra, BQ2103553770Y;
- c. One Sony PlayStation 4, Model CUH-7115B with power cord – black in color;
- d. One terabyte SSD drive, S/N: 172680420811 and box;
- e. One terabyte hard drive, S/N: WX31A770PXVV;

- f. One LG brand cellular phone – silver in color – IMEI: 359591101054125, with charging cord;
- g. One Dell Inspiron 15 laptop computer with power cord – service tag/serial # 19QDNH2;
- h. One blue Nokia smartphone with charger seized from Hadi Matar, by law enforcement, on or about August 12, 2022; and
- i. One Samsung Galaxy S10+, black with charger, seized from Hadi Matar, by law enforcement, on or about August 12, 2022.

KNIVES:

- a. One black knife; and
- b. Seven assorted knives of varying styles and colors, with one black and white colored protective sheath for a fixed blade.

All pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461.

DATED: Buffalo, New York, July 17, 2024.

TRINI E. ROSS
United States Attorney

BY: S/TIMOTHY C. LYNCH
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A TRUE BILL:

S/FOREPERSON
FOREPERSON