FILED

# UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA JACKSONVILLE DIVISION

2019 DEC -5 PH 1: 52

UNITED STATES OF AMERICA

v. CASE NO. 3:19-cr-218-J-20JRK 18 U.S.C. § 2339B(a)(1)

ROMEO XAVIER LANGHORNE

#### **INDICTMENT**

The Grand Jury charges:

# **COUNT ONE**

Beginning no later than December of 2018, through on or about November 15, 2019, in the Middle District of Florida, and elsewhere, the defendant,

## ROMEO XAVIER LANGHORNE,

knowingly attempted to provide material support and resources, namely services, to a foreign terrorist organization, namely, 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, knowing that ISIS was a designated foreign terrorist organization and that ISIS has engaged and was engaging in terrorist activity and terrorism.

In violation of 18 U.S.C. § 2339B(a)(1).

#### **FORFEITURE**

- 1. The allegations contained in Count One are incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 981(a)(1)(C) and (G), and 28 U.S.C. § 2461(c).
- 2. Upon conviction of a violation of 18 U.S.C. § 2339(B), the defendant, ROMEO XAVIER LANGHORNE, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense; and all assets, foreign and domestic, pursuant to 18 U.S.C. § 981(a)(1)(G) and 18 U.S.C. § 2461(c).
- 3. If any of the property described above, as a result of any act or omission of the defendant:
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - 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 divided without difficulty,

the United States shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,

Foreperson

MARIA CHAPA LOPEZ United States Attorney

By:

LAURA COFER TAYLOR

Assistant United States Attorney

By:

FRANK TALBOT

Assistant United States Attorney Chief, Jacksonville Division

By:

CHERIE RIGSMAN

Assistant United States Attorney

Chief, National Security and Cybercrime Section

By:

D. ANDREW SIGLER

Trial Attorney, Counterterrorism Section

Department of Justice National Security Division

FORM OBD-34 11/22/19 Revised

No.

# UNITED STATES DISTRICT COURT

Middle District of Florida Jacksonville Division

## THE UNITED STATES OF AMERICA

VS.

#### ROMEO XAVIER LANGHORNE

## **INDICTMENT**

Violations:

Count One: 18 U.S.C. § 2339B

A true bill,

Foreperson

Filed in open court this 5<sup>th</sup> day

of December, 2019.

llerk

Inacus Lenotte

Bail \$\_\_\_\_\_