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 U

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:

CHERIERRIGSMAN

Assistant United States Attorney

Chief, National Security and Cybercrime Section

By:

D. ANDREW SIGLER

Trial Attorney, Counterterrorism Section

Department of Justice National Security Division

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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 54h day

of December, 2019.

Clerk

Inacus Lenoth

Bail \$_____