

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:20-mj-03562-Reid

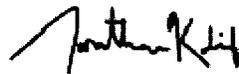
IN THE MATTER OF A
SEALED COMPLAINT

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia O. Valle)? Yes No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? Yes No
3. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to August 8, 2019 (Mag. Judge Jared M. Strauss)? Yes No

Respectfully submitted,

ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY



BY:

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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the Southern District of Florida

United States of America
v.
JONATHAN GUERRA BLANCO,
a/k/a "ABU ZAHRA AL-ANDALUSI,"
Defendant(s)

Case No. 1:20-mj-03562-Reid

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 2019-September 2020 in the county of Miami-Dade in the Southern District of Florida, and elsewhere, the defendant(s) violated:

Table with 2 columns: Code Section (18 U.S.C. § 2339B) and Offense Description (Attempted material support and resources to a designated foreign terrorist organization, namely the Islamic State of Iraq and al-Sham ("ISIS").)

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

Bryan H. Hughes signature
Complainant's signature
Bryan H. Hughes, FBI Special Agent
Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Face Time

Date: September 10, 2020

Lisette M. Reid signature
Judge's signature

City and state: Miami, Florida

Lisette M. Reid, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNDER SEAL

Case No. 1:20-mj-03562-Reid

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Bryan H. Hughes, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), and have been so employed since 2015. I am currently assigned to the FBI’s Joint Terrorism Task Force. As part of my duties as a Special Agent, I investigate criminal violations related to International Terrorism, including the provision and attempted provision of material support or resources to terrorists and foreign terrorist organizations, in violation of Title 18, United States Code, Section 2339B. During my time as a Special Agent, I have conducted numerous investigations of terrorist use of the internet, social media, and other encrypted communication platforms to further criminal activity. As a result of my experience in such investigations, I am familiar with the tactics, methods, and techniques of terrorist organizations and their members, including the use of computers, cellular telephones, and other forms of electronic communication to further their criminal activity.

2. This affidavit is submitted in support of a criminal complaint alleging that JONATHAN GUERRA BLANCO, a/k/a “ABU ZAHRA AL-ANDALUSI” (the defendant will be referred to herein as “GUERRA”), attempted to provide material support and resources to a designated foreign terrorist organization, namely the Islamic State of Iraq and al-Sham (“ISIS”), in violation of Title 18, United States Code, Section 2339B.

3. According to U.S. Department of State and State of Florida records, GUERRA is a Cuban born twenty-three year old naturalized U.S. citizen residing in Lehigh Acres, Florida, which

is located within the Middle District of Florida. Through law enforcement surveillance and communications with FBI Online Covert Employees (“OCE”s), as described more fully below, GUERRA has been confirmed to be residing at an address known to law enforcement in Lehigh Acres, Florida.

4. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging GUERRA with attempting to provide material support and resources to a foreign terrorist organization, I have not included all facts known to me concerning this investigation. I have set forth only the facts necessary to establish probable cause to believe that GUERRA committed the charged offense.

5. The facts set forth in this affidavit are based on my own personal knowledge, training, experience, and through review of communications between GUERRA and three FBI OCEs (OCE1, OCE2, and OCE3) and an FBI Confidential Human Source (“CHS”), financial and subscriber records, information provided to me by other law enforcement entities, as well as through review of publicly available information.

6. The summaries of conversations between GUERRA, the FBI CHS, and the FBI OCEs do not include all statements made during the course of each online conversation. Rather, the conversation summaries are provided for context, based on my knowledge of the investigation as a whole, as well as my training and experience. All communications between GUERRA and the FBI CHS, and the FBI OCEs have been preserved. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, unless otherwise indicated.

Applicable Law

7. **Title 18 USC § 2339B. Providing Material Support or Resources to Designated Foreign Terrorist Organizations**

(a) Prohibited activities.--

(1) Unlawful conduct.--Whoever knowingly provides material support or resources to a foreign terrorist organization, or attempts or conspires to do so, shall be fined under this title or imprisoned not more than 20 years, or both, and, if the death of any person results, shall be imprisoned for any term of years or for life. To violate this paragraph, a person must have knowledge that the organization is a designated terrorist organization ... that the organization has engaged or engages in terrorism ... or that the organization has engaged or engages in terrorism ...

Background on ISIS

8. On or about October 15, 2004, the U.S. Secretary of State designated al Qaeda in Iraq (“AQI”), then known as Jam’at al Tawhid wa’al-Jihad, as a Foreign Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act (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 (i.e., “ISIS”—which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On 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.

9. Based on my training and experience, I am aware that ISIS historically has had numerous official media components, such as Al Hayat Media Center, Amaq News Agency, and Al-Furqan Foundation for Media Production. These, and affiliated outlets, have functioned as ISIS’ media apparatus to produce and disseminate audiovisuals and graphics with high production

value which glorify and promote violence on behalf of ISIS. Based on my training and experience, I am aware that ISIS uses its respective media components to, among other things:

- a) Recruit mujahedeen fighters and other personnel including doctors, nurses, engineers, and other roles and professions;
- b) Solicit donations and other financial support;
- c) Call for attacks in the West and against other governments and civilian populations deemed enemies of ISIS;
- d) Intimidate governments, private entities, and civilians that do not share ISIS's violent jihadist philosophy; and
- e) Claim responsibility for terrorist attacks.

10. Based on my training and experience, I am also aware that ISIS members have used social media applications, video-sharing sites, blogs and other internet-based sites and applications to distribute their official communications inexpensively, safely, and broadly. In addition, I am aware that ISIS and other foreign terrorist organizations use these online tools to communicate (publicly and privately) with sympathizers and potential recruits, and to distribute their respective messages to legitimate media outlets, in order to draw attention to the organizations, recruit new members, raise money, and promote violent jihad, all in an effort to carry out the terrorism-related goals of the organizations. ISIS has increasingly trended towards reliance on communication platforms that feature end-to-end encryption, which ensure that only the sender and recipient of a message have the ability to view the content of communications. Encrypted applications such as Social Media Platform 1 ("SMP1"), Social Media Platform 2 ("SMP2"), and Social Media Platform 3 ("SMP3") allow ISIS members to avoid detection when spreading propaganda, recruiting others, and communicating attack planning information.

11. In August 2015, Al Himmah Library, an official media operation for ISIS according to open source information, published a document online titled, “You are a Mujahid, O Media Man,” about the importance of ISIS propaganda. In the publication, ISIS proclaimed, “the media has far-fetched impact in changing balances of battles waged . . . because the media publishes or disseminates the victories of Muslims against their enemies, shows support for them, and their heroism in addition to bestowing praise on them. These issues are bound to invigorate the mujahidin[.]”

12. In this same publication, ISIS further proclaimed that the “Jihadi media” is “no less important than engaging in battle,” and argued that it “is necessary to attain media victory to go along [with] the escalating military victory.” The publication equated the importance of ISIS’s military victory and victory in the “propaganda war that the Crusader US and its allies are waging against the Islamic State,” arguing that “(half the battle) is a media battle” and “the power of words is sharper (stronger) than atomic bombs.” The publication repeatedly equated the work of ISIS propagandists to ISIS soldiers waging violent jihad: “Inciting jihad is equal to (waging) jihad He who incites (people) is a mujahid in the cause of Allah Almighty. He will earn the same wages like the brother who goes into jihad[.]” Towards the end, the publication again declared, “So, my dear unknown media soldier, know how valuable your role is in attaining victory. . . . [Y]ou are a mujahid for the cause of Allah[.]”

13. Due to ISIS’s territorial and key personnel losses, official ISIS media publications have waned and the organization has become more reliant on its worldwide supporters. As a result, unofficial ISIS media networks have emerged, and function as a decentralized network to increase the dissemination of pro-ISIS messages and propaganda. Since 2019, groups such as ISIS Media Network 1 (“IMN1”) and ISIS Media Network 2 (“IMN2”) have fulfilled this role, operating on

SMP1 and other encrypted platforms to produce and spread ISIS videos, instructional guides, graphics, and related media which incite and equip primarily Spanish-speaking followers to conduct operational attacks in support of ISIS. While IMN1 and IMN2 focus on producing Spanish-translated ISIS media, they also coordinate translations into various other languages, including English, Dutch, French, German, and Indonesian.

Investigative Summary

14. Since October 2019, the FBI has been investigating GUERRA for his leadership role in directing and coordinating unofficial ISIS media networks online. GUERRA was initially identified during an FBI investigation of an ISIS operative – known to law enforcement and referred to herein as “Confederate A” – who was working for GUERRA in support of IMN1 and IMN2. Based on FBI OCE interactions with GUERRA, GUERRA holds himself out as the head of IMN1, an unofficial ISIS media outlet that creates and disseminates violent ISIS propaganda and instructional material, typically translated into various languages. IMN1 operates entirely on encrypted platforms – principally SMP1¹ – but its graphics and threatening videos are widely reported by Spanish news and other open source news outlets. Through OCE interactions with GUERRA, detailed below, GUERRA recruits other online ISIS sympathizers with foreign language abilities, and directs their translation of ISIS propaganda and instructional content for incorporation into IMN1 publications.

15. Investigation has shown that GUERRA has substantial knowledge of advanced techniques and methods to maintain anonymity online. GUERRA consistently uses virtual private

¹ Certain attributes of an SMP1 account can be modified by the user, such as display name and username, however the unique account identification number (“UID”) cannot be changed. As discussed below, law enforcement has identified UIDs used by GUERRA. For the UIDs that are listed below, the full number is known, but only the last 3 digits are specified herein. In addition, for the UIDs below, GUERRA utilized multiple aliases, including “ABU ZAHRA AL-ANDALUSI.”

networks (“VPN”s²) and accesses internet services through TOR³ in order to obfuscate his true location and other personally identifying information. GUERRA also instructs members of his ISIS network in these practices. In order to avoid detection by law enforcement or intelligence services, GUERRA utilizes numerous communication accounts on SMP1 and similar platforms, creating new accounts and discarding old accounts on a routine basis. Once GUERRA identifies and recruits an ISIS sympathizer with foreign language ability on SMP1, GUERRA often maintains communication with that user by creating new accounts for private discussion, or by requesting the user create additional accounts to share with GUERRA.

16. During the course of investigation, OCE1, OCE2, and OCE3 have portrayed ISIS sympathizers with foreign language abilities.⁴ It was on this basis that GUERRA “recruited” OCEs to help translate and disseminate ISIS media for IMN1.⁵ CHS also portrayed an ISIS sympathizer, but without foreign language ability. Both OCE3 and the CHS were initially identified and contacted by GUERRA in pro-ISIS SMP1 groups, and were then pursued romantically by GUERRA. Both OCE1 and OCE3 are located in, and have communicated with GUERRA from Miami, Florida.

17. GUERRA’s identity was ultimately confirmed through his communications with OCE3, in which GUERRA indicated his leadership role in IMN1 and provided his true name, numerous true photographs of himself, as well as other personally identifying information.

² A VPN is a tool that may be used by an internet user for security and privacy purposes. A VPN can mask or hide the user’s IP address and physical location. A VPN may thwart attempts by search engines, advertisers, web sites themselves, internet service providers, and even government entities to obtain user’s web browsing data.

³ The Onion Router, or “TOR” as most commonly known, is software that directs a user’s internet traffic through a series of TOR network relays which apply multiple layers of encryption. Use of TOR is an effective means to access the internet anonymously, by concealing one’s true location.

⁴ Upon GUERRA’s questioning of OCE2’s affiliation to ISIS, OCE2 indicated that OCE2 demonstrates their allegiance to ISIS every time OCE2 translates an ISIS video. When asked the same question in return, GUERRA urged OCE2 to trust him, and stated he could not “express things which are clearly ‘crime’[sic] where I am.”

⁵ For example, in a conversation with OCE2 on or about 18 April 2020, GUERRA stated “[w]ithout us the IS [Islamic State] in the online world is dead.”

18. GUERRA's numerous communication accounts were correlated through OCE and CHS interactions with GUERRA, travel records, telephone records, and financial records. Investigation has shown that GUERRA was the user of the below described accounts on two platforms, specifically SMP1 and SMP2. GUERRA used the same SMP1 account to communicate with OCE1, OCE2, and CHS. During the same time period, and using the same account, GUERRA provided his telephone number to the CHS. This same telephone number was identified as having called a telephone number registered to GUERRA's relative on multiple occasions in 2019. While still using the same account, GUERRA told OCE1 that he would not be posting online for a week in October 2019. Travel records confirm that GUERRA and family members traveled to Mexico during the same time frame as given to OCE1. In later communications with OCE3 in July 2020, while using a different SMP2 account, GUERRA stated he traveled to Mexico "less than a year ago."

19. During the same period of time in which GUERRA revealed his true personal identifiers to OCE3, having made first contact with OCE3 on SMP1, GUERRA utilized the *same* SMP1 account to request that OCE2 translate a violent ISIS propaganda video for IMN1.

Communication with OCE1

20. OCE1 was first contacted by GUERRA via SMP1 on or about 11 October 2019; GUERRA utilized an SMP1 account (UID ending in -565). At that time, OCE1 was already in communication with Confederate A, who was a foreign-based ISIS operative involved in the direction of IMN1 and IMN2. Prior to the initial interaction with GUERRA, Confederate A told OCE1 that OCE1 would be contacted by "a trusted brother," who would use the code name "Stefan Smart." Confederate A also instructed OCE1 to make multiple SMP1 channels in which to archive IMN1 and IMN2 content, to prevent their loss. Confederate A then instructed OCE1 to help with

anything that GUERRA asked of OCE1. Confederate A also expressed his belief that he would soon be arrested by intelligence authorities in the country where he was located.

21. In GUERRA's first message to OCE1 utilizing an SMP1 account (UID ending in -565), GUERRA introduced himself as "Stefan Smart." On or about 13 October 2019, GUERRA stated he created and administered the IMN2 SMP1 channel since 2018, and that he was involved in the editing of "new official videos." GUERRA also claimed to be the administrator for IMN1, which he was then working to reinvigorate. On or about 15 October 2019, GUERRA sent OCE1 the link to a news article about the arrest on 5 October 2019 of an IMN1-affiliated ISIS supporter in Spain. GUERRA then sent OCE1 a link to an IMN1 graphic titled "Jamás Nos Capturarás," which translates to "You Will Never Capture Us." The FBI is aware that the IMN1-affiliated ISIS supporter referenced by GUERRA was one of the operators of IMN1 prior to his arrest by Spanish authorities and assesses that GUERRA's message to OCE1 that "You Will Never Capture Us" refers to the fact that GUERRA himself was free and operating IMN1.

22. On or about 16 November 2019, GUERRA told OCE1 that he would not be posting for a week because he had personal matters to tend to, but that he would be very active upon his return. On or about 25 November 2019, GUERRA messaged OCE1 and advised that he was back online, and also forwarded an invitation link to an IMN2 SMP1 channel. Travel records indicate that GUERRA and multiple family members traveled to Cancun, Mexico from approximately 17 - 24 November 2019. Additionally, on 22 July 2020, GUERRA told OCE3 that he and his family went on vacation to Mexico "less than a year ago."

23. In early November 2019, IMN1 produced and widely released a video on SMP1 which threatened terrorist attacks against Spanish National Police and subway infrastructure targets in Spain. The video featured a masked individual who stated that ISIS cells within Spain remain

intact despite recent arrests, which was a reference to the Spanish National Police's arrest of the IMN1-affiliated ISIS operative on 5 October 2019. The video was widely reported in Spain, and prompted terrorism related investigative activity by both Spanish National Police and Guardia Civil.

24. On or about 19 November 2019, Confederate A sent OCE1 multiple photographs of himself wearing a black mask and dark sunglasses, and indicated that the mask and glasses were for a video. Confederate A also asked OCE1 what the "kuffar"⁶ thought about his threat. Upon review of the photographs sent to OCE1, it was determined that Confederate A was in fact the masked individual that appeared in the IMN1 video threatening Spain.

25. On or about 4 December 2019, OCE1 made contact with GUERRA, who was then utilizing an SMP2 account that referenced IMN1. After confirming one another's identity, GUERRA and OCE1 discussed concerns about Confederate A's lack of online presence. GUERRA surmised that Confederate A had been captured by intelligence services. GUERRA advised OCE1 to use extreme caution with any future communications with Confederate A, until GUERRA could verify Confederate A's identity. GUERRA asserted that he knew Confederate A very well, and to "know more things about him than anyone else here." GUERRA also sent OCE1 an invitation link to a private SMP2 group called "wecirayi."

26. On or about 5 December 2019, OCE1 observed that GUERRA posted a graphic to the wecirayi group titled "Preview from [IMN1] – AL ANDALUZIA (SPAIN)." The graphic featured one image of two armed jihadists. On or about 7 December 2019, approximately two days after GUERRA posted the preview graphic, IMN1 widely released another video which again threatened terrorist attacks in Spain and urged supporters to take up arms for ISIS. The video

⁶ Based on my training, "kuffar" is a derogatory Arabic term for non-believers of Islam.

featured footage of armed jihadists on patrol and included other images of firearms and Spanish National Police vehicles. Based on review of the video footage, it has been determined that the imagery from the preview graphic and that which appeared in the final produced video are the same.

27. On or about 8 February 2020, the IMN1 network produced and disseminated a pro-ISIS video titled “Called to Islam.” The video featured a Spanish-language narrative threatening non-believers to convert to Islam. The video featured footage of the Biltmore Hotel in Miami as well as the Las Vegas Strip, along with video clips of a suicide bomber’s farewell address and gruesome images from an ISIS prisoner execution.

28. Analysis revealed that the videos produced and released by GUERRA, and other confederates, contain a background compilation of stock video clips available online for purchase and download from different providers. Banking records indicate that GUERRA purchased⁷ an annual subscription to a digital stock media provider located overseas, on or about 21 October 2019, prior to the release of the IMN1 videos mentioned above. The stock media provider offers an array of proprietary digital video footage, animations, music and other digital media for purchase and download from their website.⁸ An open source review of the provider’s stock footage offerings confirmed that the stock footage used in GUERRA’s IMN1 videos were sourced from this provider. This was also confirmed through reverse image searches, a process to determine whether digital images are sourced from other content historically or presently available on the internet.

⁷ The subscription was purchased using a credit union account to which GUERRA is a beneficiary. The account is held in the name of one of GUERRA’s relatives.

⁸ Users of the stock media provider website can query for highly specific original digital video clips to purchase, download, and ostensibly incorporate into larger video productions.

29. In early February 2020, IMN1 produced and released an instructional guide titled “Elabora una bomba en la cocina de tu Mamá,” a translation of “How to Make a Bomb in the Kitchen of Your Mom,” which was previously published in the Al-Qaeda in the Arabian Peninsula (AQAP) Inspire Magazine around 2010. The document’s first page featured a partially obscured person holding a pressure cooker, with the title “[IMN1] Open Source Jihad.”⁹ Contained within the document were detailed instructions on how to create an improvised explosive device (IED), which were translated from English into Spanish. The instructional guide was widely distributed within pro-ISIS SMP1 groups and ultimately reported on by public news outlets in February 2020.

30. On or about 2 March 2020, GUERRA continued communications with OCE1, having transitioned from previously identified SMP1 accounts to SMP3.¹⁰ GUERRA then utilized an account from SMP3 and requested that OCE1 help translate an instructional guide on how to build a “mail bmb.”¹¹ GUERRA then asked OCE1 to locate the source material for translation, noting “[s]earch for [I]nspire [M]agazine Open [S]ource Jihad ... [d]o it without internet connection [i]t’s a sensitive topic.” On the same day, OCE1 had created an SMP1 account to share with GUERRA, at GUERRA’s instruction. On or about 2 March 2020, an SMP1-generated notification sent to OCE1 indicated that GUERRA was accessing the shared account from a device that was identified as an LGE V20. Based on my training, experience, and the context, I believe this is an LG V20, which is a commercially available smartphone.

31. On or about 3 March 2020, while in discussions with OCE1 regarding the coordination of ISIS media translations, GUERRA stated “[t]he other Arabic sandwich is almost ready ... [t]hey

⁹ “Open Source Jihad,” from AQAP’s Inspire magazine, is a collective of instructional guides proclaimed to be “America’s worst nightmare,” which encourage violent “lone wolf” attacks against the West, and provide detailed instructions on how to make homemade weapons, explosives, and related devices.

¹⁰ SMP3 is a communication platform which offers end-to-end encryption, as is optimized for access through TOR, and recommended to be used with the SMP2 mobile client.

¹¹ Based on the context of the conversation, I know that GUERRA intended the word “bomb.”

will deliver it to me tomorrow ... [i]t has to be prepared another way I prefer.” GUERRA also stated “when the sandwich has been made you can help me season it.” Based on my experience and knowledge of the investigation, I know that by using the terms “sandwich” and “season,” GUERRA was referring to an Arabic-language ISIS video (the “sandwich”), and that GUERRA would request OCE1’s assistance in editing (“season”[ing]) the video prior to its publication.

Communication with OCE2

32. As of January 2020, GUERRA contacted OCE2 on SMP1 and requested OCE2 help with translation of ISIS media for IMN1; GUERRA had utilized the same SMP1 account in previous communications with OCE1 and CHS. On or about 30 January 2020, GUERRA initiated a private chat with OCE2 utilizing a different account name, having transitioned from SMP1 to the SMP2 application. On or about 8 February 2020, GUERRA sent OCE2 an invitation link to an SMP1 group called “[IMN1],” which contained approximately seven members.

33. On or about 10 February 2020, GUERRA posted to the IMN1 SMP1 group a document titled “Open Source Jihad 2 –[IMN1]– La mas poderosa maquina de chapear – Consejos para nuestr@s herman@s ...,” which translates in salient part to “The Ultimate Mowing Machine.” The document provided Spanish-translated encouragements and instructions on how to effectively conduct a vehicle attack against pedestrian targets. While the English-language version of the document was previously released in a 2010 publication of AQAPs Inspire Magazine, GUERRA’s IMN1-branded version featured original content which included instructions for the use of VPNs, multi-layered encryption applications, and other sophisticated tradecraft to avoid detection by authorities. On or about 11 February 2020, GUERRA stated to OCE2 that he was the creator of the video “Called to Islam,” as described more fully above.

34. On or about 20 March 2020, GUERRA requested that OCE2 create an SMP1 account that GUERRA and OCE2 could share. At this time, GUERRA had transitioned to another SMP2 account. GUERRA instructed OCE2 to create the SMP1 account using a telephone number for registration purposes, and then to send GUERRA both the telephone number and an SMP1-generated PIN number.¹² Upon GUERRA's login to the shared SMP1 account, OCE2 observed an SMP1-generated message indicating that GUERRA had accessed the account again with an LGE V20 device.

35. On or about 19 June 2020, OCE2¹³ was contacted by GUERRA, who was using the *same* SMP1 account as in later communications with OCE3.¹⁴ GUERRA stated that he was from IMN1, and requested that OCE2 join the IMN1 team of translators. When asked what IMN1's goal was, GUERRA stated "[to] [m]ake the word of Allah high ... [t]he highest." On or about 24 June 2020, GUERRA sent OCE2 multiple instructional graphics that detailed how to install a "fake GPS" application on OCE2's cellular phone or other device. The application purported to disguise a user's true location, and to enable a user to make their device appear to be located elsewhere in the world. Based on my training and experience, this and similar applications are used by ISIS members to obfuscate metadata generated while using the internet, for the purpose of avoiding detection by law enforcement authorities.

36. On or about 25 June 2020, GUERRA sent OCE2 an Arabic language ISIS video titled, as translated from Arabic, "Battle of Attrition 3." The video featured graphic depictions of beheadings, drive-by executions of civilians, and other gruesome ISIS executions of Kurdish

¹² Based on my experience, I know that SMP1 allows two devices to be logged into the same SMP1 account. After the account is logged into from one device, the other device must enter an account verification PIN number to authenticate that both users are one and the same.

¹³ OCE2 utilized a different account, and portrayed a different ISIS sympathizer with foreign language ability.

¹⁴ Guerra utilized an SMP1 account with the UID ending in -471.

prisoners. GUERRA requested that OCE2 translate the video from Arabic to English, for incorporation into a new video. GUERRA also stated to OCE2 “[i]t’s your duty,” and when asked about this, clarified by stating “[j]ihad [f]isabilillah is Fard Ain.”¹⁵ On or about 28 June 2020, GUERRA sent a photograph to OCE2, and stated that he was in the process of “[w]orking on the video subtitle,” a reference to the “Battle of Attrition 3” video. Upon review of the photograph, GUERRA’s computer monitor can be seen displaying imagery from Battle of Attrition 3, as well as a video editing application. GUERRA sought, obtained, and ultimately disseminated the English-translated version of “Battle of Attrition 3” on SMP1.

Communication with OCE3

37. On or about 13 July 2020, OCE3 was contacted by GUERRA, who was utilizing an SMP1 account with a UID ending in -471. Both OCE3 and GUERRA were members in a pro-ISIS SMP1 group. In response to OCE3’s posting, in which OCE3 stated an interest that “ALL Muslim brothers unite against the enemies of Allah,” GUERRA privately messaged OCE3 and asked, among other things, if OCE3 would like to help. GUERRA further stated “I’m [IMN1] Alhamdulillah.”¹⁶

38. On or about 17 July 2020, GUERRA requested OCE3 continue communicating with GUERRA via the SMP2 application.¹⁷ GUERRA utilized an SMP2 account and during the course of discussion with OCE3, GUERRA stated “I always strive to please Allah, [I] don’t want to brag, but [I] dedicate my entire life to J...ad.” In my training and experience, I know that ISIS members intentionally misspell or partially spell words *believed* to carry criminal significance, such as jihad. Based on my investigative experience, ISIS members avoid the use of key terms online, such as

¹⁵ Fisabilillah is an Arabic expression meaning “in the cause of Allah.” Fard Ain is an Arabic expression to describe a religious duty.

¹⁶ Alhamdulillah is an Arabic phrase meaning “praise be to God.”

¹⁷ Based on my experience, SMP2 is a messaging application which offers end-to-end encryption.

jihad, bomb, or attack, in order to avoid detection by social media or internet service providers that may use algorithms to search written communications for such words that may violate the provider's terms of service.

39. In discussions with OCE3 on or about 17 July 2020, GUERRA told OCE3 his name was "Jonathan," and that he lived with family members in Lehigh Acres, Florida. GUERRA provided current photographs of himself and his daughter. Based on review of the photographs sent to OCE3, the photographs identify GUERRA and match those observed through official government IDs, public records, and law enforcement surveillance. Of the multiple photographs sent to OCE3, several appear to be taken from within a garage where a red Suzuki sport utility vehicle ("SUV") can be observed parked within the garage. According to current Florida Department of Highway Motor Vehicle and Safety records, a red Suzuki SUV is registered to one of GUERRA's relatives¹⁸ at an address known to law enforcement in Lehigh Acres, Florida.

Communication with CHS

40. GUERRA contacted the CHS via SMP1 on or about 19 November 2019, utilizing an SMP1 account Abu Zahra al Andalusi (UID ending in -565)¹⁹ the same account identified by the FBI through GUERRA's interactions with OCE1. GUERRA stated to the CHS that he was the administrator of a "big channel," and requested that the two resume private discussions on SMP2, in which GUERRA utilized an SMP2 account. During interactions with CHS, GUERRA stated he lived in the United States and provided his telephone number. Business records obtained by law enforcement show the telephone number GUERRA provided belongs to a Verizon cellular telephone account in the name of a relative of GUERRA.

¹⁸ The full identities of relatives of GUERRA referred to in this affidavit are known to law enforcement, and can be provided to the Court upon request.

¹⁹ In this instance, GUERRA modified both the display name and username for his SMP1 account, however the UID remained unchanged from previous OCE/CHS interactions with GUERRA's account.

Financial Support

41. During the course of investigation, the FBI obtained Confederate A's personal identifiers and communication accounts developed from online communications between Confederate A and OCE1, and from subscriber records for social media accounts known to be utilized by Confederate A. Subscriber records indicate that Confederate A created a Coinbase²⁰ cryptocurrency account on or about 29 July 2019. Between approximately 3 – 6 August 2019, Confederate A received approximately \$572 from a Coinbase account registered in the name of one of GUERRA's relatives, with a provided registrant address in Lehigh Acres, Florida. User-generated notes of "hey buddy," "done" and "got it," followed each transaction, respectively.

42. Coinbase records also indicate that the account registered to GUERRA's relative received funds from a credit union account.²¹ Records from the credit union further indicate GUERRA to be the beneficiary named on the credit union account, which was otherwise registered to GUERRA's relative.

43. By way of background, on or about 25 September 2019, Confederate A told OCE1 that Confederate A had been recently named the "ameer²² [sic] of campaign that collect [sic] money from [b]rothers and sisters from online form [sic]." Confederate A stated this was due to the death of key ISIS personnel in "[overseas locations]." Confederate A went on to state "you know jihad need [sic] money resources [in overseas locations]."

²⁰ Coinbase is an online exchange platform where users can buy, sell or otherwise transfer Bitcoin digital currency.

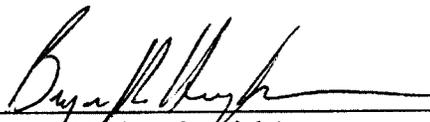
²¹ Bitcoin exchange accounts are typically funded via traditional bank accounts. Once an exchange account is funded, users can proceed to transact in the digital currency environment.

²² Based on my training, "emir" is a title given to Muslims in high office, or military command roles, and is a term used for key leadership roles within ISIS as an organization.

CONCLUSION

44. For the reasons stated herein, there is probable cause to find that JONATHAN GUERRA BLANCO, a/k/a "ABU ZAHRA AL-ANDALUSI," has attempted to provide material support and resources to ISIS, in violation of Title 18, United States Code, Section 2339B.

FURTHER AFFIANT SAYETH NAUGHT



Bryan H. Hughes, Special Agent
Federal Bureau of Investigation

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1
by Face Time this 10th day of September 2020.



HONORABLE LISETTE M. REID
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF FLORIDA