

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT LORENZO HESTER, JR.,
a/k/a “Mohammed Junaid Al Amreeki,”
a/k/a “Junaid Muhammad,”
a/k/a “Rabbani Junaid Muhammad,”
a/k/a “Rami Talib,”
a/k/a “Ali Talib Muhammad”
[DOB: 04/21/1991],

Defendant.

Case No.

COUNT ONE: 18 U.S.C. § 2339A
*Attempted Provision of Material Support or
Resources to Terrorists*

NMT 15 Years’ Imprisonment

NMT \$250,000 Fine

NMT 3 Years’ Supervised Release

Class C Felony

COUNT TWO: 18 U.S.C. § 2339B

*Attempted Provision of Material Support or
Resources to a Designated Foreign Terrorist
Organization*

NMT 20 Years’ Imprisonment

NMT \$250,000 Fine

NMT 3 Years’ Supervised Release

Class C Felony

\$100 mandatory special assessment each count

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Attempted Provision of Material Support or Resources to Terrorists)

From in or about October 2016 up to and including on or about February 17, 2017, in the Western District of Missouri and elsewhere, ROBERT LORENZO HESTER, JR., a/k/a “Mohammed Junaid Al Amreeki,” a/k/a “Junaid Muhammad,” a/k/a “Rabbani Junaid Muhammad,” a/k/a “Rami Talib,” a/k/a “Ali Talib Muhammad,” the defendant, did attempt to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), namely, property, service, training, and personnel, knowing and intending that

they were to be used in preparation for, and in carrying out, a violation of Title 18, United States Code Section 2332a, to wit, use and attempted use of weapons of mass destruction, in violation of Title 18, United States Code, Section 2339A.

COUNT TWO

(Attempted Provision of Material Support or
Resources to a Designated Foreign Terrorist Organization)

From in or about October 2016 up to and including on or about February 17, 2017, in the Western District of Missouri and elsewhere, ROBERT LORENZO HESTER, JR., a/k/a “Mohammed Junaid Al Amreeki,” a/k/a “Junaid Muhammad,” a/k/a “Rabbani Junaid Muhammad,” a/k/a “Rami Talib,” a/k/a “Ali Talib Muhammad,” the defendant, did knowingly attempt to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), namely, property, service, training, and personnel, to a foreign terrorist organization, to wit, the Islamic State of Iraq and al-Sham (“ISIS”), which at all times relevant to this Indictment was designated by the Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act (“INA”), knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS has engaged and engages in terrorist activity (as defined in section 212(a)(3)(B) of the INA), and that ISIS has engaged and engages in terrorism (as defined

in section 104(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), in violation of Title 18, United States Code, Section 2339B.

A TRUE BILL.

Dated: 2/23/17
Kansas City, Missouri

/s/ Megan M. DeLeo
FOREPERSON OF THE GRAND JURY

/s/ Brian P. Casey
Brian P. Casey
Assistant United States Attorney

/s/ David Raskin
David Raskin
Assistant United States Attorney