

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 20-20245-cr-RNS**

**UNITED STATES OF AMERICA**

**vs.**

**JONATHAN GUERRA BLANCO,**

**Defendant.**

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**Factual Stipulation**

The United States of America and **JONATHAN GUERRA BLANCO** (hereafter “**GUERRA**” or “the Defendant”), personally and through his attorney, agree that the following statements are true and accurate and serve as the factual basis for the Defendant to enter a plea of guilty, and could have been proven beyond a reasonable doubt if this case went to trial:

At all times relevant to the criminal Information in this case, the Islamic State of Iraq and al-Sham (“ISIS”) was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, and the Defendant knew that ISIS was a designated foreign terrorist organization, that ISIS engages and has engaged in terrorist activity and that the ISIS engages and has engaged in terrorism.

ISIS has equated the value of propaganda work on its behalf to the value of ISIS soldiers waging violence. ISIS has called for people to contribute their social media services to its cause to invigorate its terrorists. ISIS members use 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, 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.

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. **GUERRA** directed and coordinated the efforts of IMN1 and IMN2. While IMN1 and IMN2 focus on producing Spanish-translated ISIS media, they also coordinated translations into various other languages, including English, ~~Dutch~~, French, German, and Indonesian.  KEG

ISIS often uses 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. **GUERRA** consistently uses virtual private networks ("VPN"s) and accesses internet services through TOR in order to obfuscate his true location and other personally identifying information. In conversations in these encrypted applications, **GUERRA** also instructed members of his ISIS network in these practices to improve their ability to operate on



behalf of ISIS without detection. As two examples, **GUERRA** recommended the use of a particular encryption software and type of computer hardware to conceal internet activity. These items, the software and the precise type of recommended hardware were found during the search warrant executed at **GUERRA**'s residence. The search also led to the discovery of a hand drawn ISIS flag concealed beneath the mattress in **GUERRA**'s room.

When **GUERRA** identified an ISIS sympathizer with foreign language ability on SMP1, he would attempt to recruit and maintain communication with that user by creating new accounts for private discussion, or by requesting the user create additional accounts to share with **GUERRA**.

**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. The investigation was furthered through the use of FBI Online Covert Employees (“OCE”s) and a Confidential Human Source (“CHS”). 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.” This quote is an example of the available evidence showing that **GUERRA** took up ISIS’ call for its supporters to provide services in online media operations on its behalf, and that **GUERRA** attempted to provide services to ISIS.

During the course of investigation, OCE1, OCE2, and OCE3 have portrayed ISIS sympathizers with foreign language abilities.<sup>1</sup> It was on this basis that **GUERRA** “recruited” OCEs to help translate and disseminate ISIS media for IMN1. Both OCE3 and the CHS were

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<sup>1</sup> 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.” This quote is an example evincing **GUERRA**'s knowledge of ISIS's terrorist designation. The content of the videos and pamphlets disseminated by IMN1 evincing **GUERRA**'s knowledge of ISIS terrorism and terrorist activities.

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. **GUERRA** recruited the OCEs in an attempt to provide the service of more broadly disseminating pro-ISIS material from in or around October 2019 through on or about September 11, 2020.

On or about 5 December 2019, OCE1 observed that **GUERRA** posted a graphic to a group in SMP2 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 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.

On or about 8 February 2020, IMN1 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. Stock video clips used in the video (as well as the earlier mentioned videos) are from a stock footage subscription service purchased by **GUERRA**.<sup>2</sup> In a later conversation with OCE2, **GUERRA** admitted he created the video.

On or about 10 February 2020, **GUERRA** posted to the IMN1 SMP1 group a document

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<sup>2</sup> The subscription was purchased using a credit union account to which **GUERRA** was a beneficiary. The account was held in the name of one of **GUERRA**’s relatives.



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 provided a Spanish language translation for broader dissemination 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 2 March 2020, **GUERRA** requested that OCE1 help translate an instructional guide on how to build a “mail bmb.”<sup>3</sup> **GUERRA** asked OCE1 to locate the source material for translation and gave instructions how to do so in a manner to avoid detection.

**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, true photographs of himself, as well as other personally identifying information. Based on his communications with OCE3, **GUERRA** traveled to Miami, Florida on September 11, 2020. This meeting was a takedown, and **GUERRA** was arrested in possession of a phone that contained evidence of the communications with OCE3, as well as cryptocurrency transactions.

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.

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<sup>3</sup> Based on the context of the conversation, **GUERRA** intended the word “bomb” and a reasonable inference to draw is that by omitting a letter, he was attempting to circumvent security filters. Likewise, in other conversations, **GUERRA** used coded language. For instance, in a conversation with OCE1, **GUERRA** used “sandwich” and “season,” to refer to an Arabic-language ISIS video (the “sandwich”), and that **GUERRA** would request OCE1’s assistance in “season[ing]” [editing] prior to its publication.

On or about 20 December 2019, **GUERRA** produced and coordinated the dissemination of an IMNI1 video which threatened and encouraged terrorist attacks in Madrid, Spain, on behalf of ISIS. The video, which was widely reported by Spanish news outlets, included video footage of Christmas celebrations at a landmark public square in Madrid. The video featured narration and subtitles which stated, among other things, “don’t let them celebrate in peace,” and “kill them, give them jihad!” As a result of the video’s release, a planned concert of Venezuelan musicians at the public square was cancelled, citing the terrorist threat. Video analysis confirmed that certain audiovisual characteristics of the IMNI1 video matched those downloaded from a subscription service by **GUERRA** in 2019.

This statement does not reflect a full recitation of relevant facts or available evidence in this case and is intended to serve as the factual basis for the defendant’s guilty plea.

Respectfully Submitted,

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UNITED STATES ATTORNEY

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~~JONATHAN KOBRINSKI~~ Karen E. Gilbert  
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Date:

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Defendant