

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Criminal Case No. 23-cr-00349-REB

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. DAVIN DANIEL MEYER,
a/k/a "Abdul Rahman ibn Meyer,"
a/k/a "Abdul Rahman al-Amriki,"

Defendant.

INDICTMENT

The Grand Jury charges:

COUNT 1

From at least in or about November, 2022, and continuing through July 14, 2023, in the State and District of Colorado and elsewhere, the defendant, DAVIN DANIEL MEYER, a/k/a "Abdul Rahman ibn Meyer," a/k/a "Abdul Rahman al-Amriki," did knowingly attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), to wit, services and personnel (including himself), 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, knowing that ISIS was a designated terrorist organization and that ISIS engages and has engaged in terrorist activity and terrorism.

All in violation of Title 18, United States Code, Section 2339B.

FORFEITURE ALLEGATION

1. The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and (G) and Title 28, United States Code, Section 2461.

2. Upon conviction of the offenses in violation of Title 18, United States Code, Section 2339B set forth in Count One of this Indictment, the defendant, DAVIN DANIEL MEYER, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and (G) and Title 28, United States Code, Section 2461, including any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations, and all assets, foreign or domestic, involved in, or used or intended to be used in the commission of such violations. The property to be forfeited includes, but is not limited to the following property:

- a. iPhone;
 - b. Desktop computer; and
 - c. \$600 U.S. currency.
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 of America shall be entitled to forfeiture of substitute property
pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18,
United States Code, Section 981.

All pursuant to 18 U.S.C. §§ 981(a)(1)(C) and (G), and 28 U.S.C. § 2461.

A TRUE BILL:

Ink signature on file with the Clerk's Office
FOREPERSON

COLE FINEGAN
United States Attorney

By: s/ Melissa Hindman
Melissa Hindman
Assistant U.S. Attorney
U.S. Attorney's Office
1801 California St., Ste. 1600
Denver, CO 80202
Telephone: 303-454-0100
E-mail: Melissa.Hindman@usdoj.gov
Attorney for Government