

OCT 16 2024

T McCalvin, Deputy

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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF MARICOPA

THE STATE OF ARIZONA,

Plaintiff,

vs

MARVIN JALO,  
aka MARVIN JALO  
aka MARVIN ANEER JALO

Defendants.

**CR 2024 - 007882 - 001**

**INDICTMENT**

**880 GJ 640**

**COUNT 1: TERRORISM, A CLASS 2 FELONY  
DANGEROUS (MARVIN JALO)**

**COUNT 2: CONSPIRACY TO COMMIT  
TERRORISM, A CLASS 2 FELONY  
DANGEROUS (MARVIN JALO)**

The Grand Jurors of Maricopa County, Arizona, accuse MARVIN JALO, on October  
16, 2024, charging that in Maricopa County, Arizona:

**COUNT 1.**

MARVIN JALO, on or between November 1, 2023 and May 31, 2024, intentionally or knowingly, did provide advice, assistance, direction or management of an act of terrorism to further the goals, desires, aims, public pronouncements, manifestos or political objective of the Islamic State of Iraq and the Levant (ISIL), also known as the Islamic State of Iraq and al-Sham (ISIS), also known as the Islamic State of Iraq and Syria, a terrorist organization and/or al-Qa'ida (AQ), a terrorist organization, in violation of A.R.S. §§ 13-2308 01, 13-2301, 13-701, 13-702, and 13-801.

Or in the alternative, MARVIN JALO, on or between November 1, 2023 and May 31, 2024, intentionally or knowingly, did provide advice, assistance, direction or management of an act of terrorism to intimidate or coerce a civilian population in violation of A.R.S. §§ 13-2308 01, 13-2301, 13-701, 13-702, 13-301, 13-301, 13-303, 13-304 and 13-801

The State further alleges that the offense charged in this count is a dangerous felony because the offense involved the discharge, use, or threatening exhibition of an improvised explosive device, a deadly weapon or dangerous instrument, in violation of A.R.S. §§ 13-105, 13-704 and 13-3101

**COUNT 2.**

MARVIN JALO, on or between November 1, 2023 and May 31, 2024, with the intent to promote or aid the commission of an offense, to wit Terrorism, agreed with Juvenile A and/or other unnamed co-conspirators that at least one of them or another would engage in conduct constituting the offense of Terrorism, and MARVIN JALO, committed the following overt act(s): acquisition of precursor chemicals for the creation of an improvised explosive device. In doing so, MARVIN JALO did intentionally or knowingly, provide advice, assistance, direction or management of an act of terrorism to further the goals, desires, aims, public pronouncements, manifestos or political objective of the Islamic State of Iraq and the Levant (ISIL), also known as the Islamic State of Iraq and al-Sham (ISIS), also known as the Islamic State of Iraq and Syria, a terrorist organization and/or al-Qa'ida (AQ), a terrorist organization, in violation of A R S §§ 13-1003, 13-501, 13-2308 01, 13-2301, 13-701, 13-702, 13-301, 13-301, 13-303, 13-304 and 13-801


Or in the alternative, MARVIN JALO, on or between November 1, 2023 and May 31, 2024, intentionally or knowingly, did provide advice, assistance, direction or management of an act of terrorism to intimidate or coerce a civilian population with the intent to promote or aid the commission of an offense, to wit Terrorism, agreed with Juvenile A and/or other unnamed co-conspirators that at least one of them or another would engage in conduct constituting the offense of Terrorism, and MARVIN JALO,

committed the following overt act(s): acquisition of precursor chemicals for the creation of an improvised explosive device, intentionally or knowingly, did provide advice, assistance, direction or management of an act of terrorism to intimidate or coerce a civilian population in violation of A R S §§ 13-1003, 13-501, 13-2308.01, 13-2301, 13-701, 13-702, 13-301, 13-301, 13-303, 13-304 and 13-801

The State further alleges that the offense charged in this count is a dangerous felony because the offense involved the discharge, use, or threatening exhibition of an improvised explosive device, a deadly weapon or dangerous instrument, in violation of A.R.S. §§ 13-105, 13-704 and 13-3101

A true bill  
("A True Bill")

RACHEL H MITCHELL  
MARICOPA COUNTY ATTORNEY

  
Edward Leiter  
Deputy County Attorney  
sjk

Date: October 16, 2024

  
FOREPERSON OF THE GRAND JURY