

UNDER SEAL**UNITED STATES DISTRICT COURT**for the
Eastern District of VirginiaUnited States of America
v.ALLISON ELIZABETH FLUKE-EKREN,
a/k/a Allison Elizabeth Brooks, Allison Ekren, Umm
Mohammed al-Amriki, Umm Mohammed, and
Umm Jabril*Defendant(s)*

Case No. 1:19-mj-231

**CRIMINAL COMPLAINT**

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 _____ at least 2014 to the present _____ in the county of _____ * (see note below) _____ in the
_____ District of _____, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 2339B

Providing and conspiring to provide material support or resources, including personnel (including herself) and services, to a foreign terrorist organization, namely the Islamic State of Iraq and al-Sham (ISIS).

* The offenses occurred within the extraterritorial jurisdiction of the United States, and the defendant, a United States citizen, is expected to be first brought to and found in the Eastern District of Virginia pursuant to 18 U.S.C. § 2339B(d).

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Reviewed by AUSA/SAUSA:

AUSAs Raj Parekh and John Gibbs

Complainant's signature

FBI Special Agent David C. Robins

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/15/2019

City and state: Alexandria, Virginia

/s/ Theresa Carroll Buchanan
United States Magistrate Judge*Judge's signature*

Hon. Theresa Carroll Buchanan

Printed name and title

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

ALLISON ELIZABETH FLUKE-EKREN,
a/k/a "Allison Elizabeth Brooks,"
a/k/a "Allison Ekren"
a/k/a "Umm Mohammed al-Amriki,"
a/k/a "Umm Mohammed,"
a/k/a "Umm Jabril,"

Defendant.

Case No. 1:19-mj-231

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, David C. Robins, Special Agent with the Federal Bureau of Investigation, first being
duly sworn, depose and state as follows:

INTRODUCTION AND CHARGES

1. I seek a criminal complaint charging ALLISON ELIZABETH FLUKE-EKREN,
a/k/a "Allison Elizabeth Brooks," a/k/a "Allison Ekren," a/k/a "Umm Mohammed al-Amriki,"
a/k/a "Umm Mohammed," and a/k/a "Umm Jabril," with providing and conspiring to provide
material support or resources to a designated foreign terrorist organization, in violation of Title
18, United States Code, Section 2339B.

2. From at least in or about 2014, up to and including the date of this affidavit, both
dates being approximate, in offenses committed outside of the jurisdiction of any particular State
or district of the United States, the defendant ALLISON ELIZABETH FLUKE-EKREN
("FLUKE-EKREN"), a United States citizen who is expected to be first brought to and found in
the Eastern District of Virginia, together with others known and unknown, did knowingly and

unlawfully provide and conspire to provide material support or resources, as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel (including herself) and services to a foreign terrorist organization, namely the Islamic State of Iraq and al-Sham (“ISIS”), which at all relevant times was designated by the United States Secretary of State as a foreign terrorist organization, knowing that ISIS was a designated foreign terrorist organization, that ISIS engages and has engaged in terrorist activity, and that ISIS engages and has engaged in terrorism.

3. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), assigned to the Washington Field Office, Joint Terrorism Task Force (“JTTF”). I have been an FBI Special Agent since 2014. While employed by the FBI, I have investigated federal criminal violations related to violent crime, national security, and other matters. I am currently responsible for investigations involving terrorist activity of individuals affiliated with designated foreign terrorist organizations. As part of my duties, I conduct extraterritorial investigations on terrorism subjects who are located abroad. As a member of the JTTF, I remain apprised of terrorism-related matters through law enforcement and intelligence community partners. I have participated in numerous counterterrorism investigations, during the course of which I have conducted physical surveillance, executed court authorized search warrants and wire intercepts, and used other investigative techniques to secure relevant information regarding various crimes.

4. I am familiar with the facts and circumstances of this investigation from: (a) my personal participation in this investigation; (b) my review of records and reports generated by other law enforcement agents in the United States and elsewhere; (c) information provided to me by other agents and law enforcement officials; and (d) information otherwise obtained by credible and reliable sources. This affidavit is being submitted for the limited purpose of

obtaining a criminal complaint and arrest warrant. As a result, it does not include each and every fact observed by me or known to the government. When I assert that a statement was made by an individual, that statement is described in substance and in part, but my assertion is not intended to constitute a verbatim recitation of the entire statement.

OVERVIEW OF ISIS

5. ISIS is a foreign terrorist organization that seeks to accomplish its goals through the commission of various criminal acts and acts of terror against the United States and the world community. Since 2013, ISIS has claimed credit for numerous terrorist activities, including seizing Mosul, a city in northern Iraq, launching rocket attacks on eastern Lebanon in March 2014, the November 2015 terrorist attacks in Paris, France, and the March 2016 suicide bombings in Brussels, Belgium, among many others. ISIS has also claimed responsibility for murdering by beheading civilians/non-combatants from the United States, Great Britain, France, and Japan, among others, and has reportedly murdered dozens of people at a time, carried out public executions, and committed other brutal terrorist acts. ISIS's leadership has sought to accomplish its criminal goals, in part, by recruiting and accepting new members from across the globe, including the United States, to assist with its efforts to expand its so-called "caliphate"¹ in Iraq, Syria, and other locations in Africa and the Middle East.

6. On or about October 15, 2004, the United States Secretary of State designated al-Qaeda in Iraq ("AQI"), then known as Jam 'at al Tawid wa' al-Jahid, as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive order 13224. On or

¹ "Caliphate" is a term that can be used to refer to ISIS's self-proclaimed system of religious governance, with Abu Bakr al-Baghdadi as the caliphate's self-proclaimed leader.

about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act 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 of State also added the following aliases to the FTO listing: The Islamic State of Iraq and al-Sham (“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-Furquan 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.

PROBABLE CAUSE

7. FLUKE-EKREN is a 39-year-old United States citizen who is believed to be residing in Syria as a member of ISIS. FLUKE-EKREN traveled to Syria for the purpose of committing or supporting jihad. Since her departure from the United States several years ago and continuing until today, FLUKE-EKREN has been involved with a number of terrorism-related activities. These activities include, but are not limited to, planning and recruiting operatives for a potential future attack on a college campus inside the United States, and serving as the appointed leader and organizer of an ISIS military battalion in order to train women on the use of automatic firing AK-47 assault rifles, grenades, and suicide belts. Additionally, FLUKE-EKREN has provided ISIS and ISIS members with services, which include lodging, translating speeches made by ISIS leaders, training children on the use of AK-47 assault rifles and suicide belts, and teaching extremist ISIS doctrine.

8. During her time with ISIS, from at least 2014 continuing until approximately 2017, six separate individuals who interacted with FLUKE-EKREN in Syria have provided

information to the FBI about FLUKE-EKREN and her activities in Syria. The following paragraphs summarize statements from those individuals regarding their personal observations and interactions with FLUKE-EKREN in Syria.

A. Information Provided by CW-1

9. According to information provided by a cooperating witness (hereinafter, “CW-1”),² CW-1 crossed the border from Turkey into Syria in 2014 with the intent of “living in the land of Sharia.”³ Upon arriving in Syria, ISIS officials sent CW-1 to reside with FLUKE-EKREN in the city of Ablah for approximately 18 days. During that time, FLUKE-EKREN informed CW-1 that she previously lived in al-Bab, Syria, but due to the bombings, she moved to Ablah.⁴ CW-1 stated that FLUKE-EKREN was responsible for providing weapons training to women on behalf of ISIS. CW-1 observed that FLUKE-EKREN possessed a collection of weapons in her house. CW-1 identified FLUKE-EKREN’s former husband as “the emir (or leader) of the snipers for ISIS.” CW-1 further stated that FLUKE-EKREN and her former husband brought approximately \$15,000 United States dollars to Syria and used the money to purchase weapons, to include handguns, automatic firing AK-47 assault rifles, grenades, and other military-style items.

² CW-1 is a paid foreign government source who has also provided information to the U.S. government. Much of the information provided by CW-1 has been corroborated. To my knowledge, none of the information that CW-1 has provided to U.S. and foreign government officials has proved to be false, misleading or inaccurate in any material respect. For these reasons, I have deemed the CW-1’s information to be reliable.

³ Based on my experience and knowledge of the terrorist organization, this phrase is likely a reference to the ISIS caliphate, or land controlled and occupied by ISIS, which was purportedly governed by Sharia law.

⁴ The city of al-Bab was a stronghold of ISIS throughout much of 2014.

10. On or about the third day after CW-1 met her in 2014, FLUKE-EKREN presented to CW-1 an attack plan targeting a certain U.S.-based college. FLUKE-EKREN informed CW-1 that the attack would not be a suicide operation. Rather, FLUKE-EKREN stated that they would dress like infidels (non-believers) and drop off a backpack with explosives. FLUKE-EKREN told CW-1 not to worry about the logistics because she knew how to get into the U.S. from Mexico. FLUKE-EKREN stated that she was seeking vengeance, having come up with the plan after a market area was bombed by airstrikes near al-Bab and innocent children had died as a result for which FLUKE-EKREN believed Americans were responsible. FLUKE-EKREN informed CW-1 that her plan to conduct the attack in the United States had been presented by another individual to the leader of ISIS, Abu Bakr al-Baghdadi,⁵ who approved funding for the attack.

11. Following the 18 days during which CW-1 cohabitated with FLUKE-EKREN, CW-1 maintained close and continuing contact with FLUKE-EKREN for a period of time. Shortly after CW-1 was apprised of FLUKE-EKREN's potential attack plans, FLUKE-EKREN discovered that she was pregnant. Consequently, FLUKE-EKREN temporarily put the attack planning on hold. However, CW-1 learned that, in or about December 2014, FLUKE-EKREN, who was fluent in Turkish and Arabic, was involved in translating speeches made by unspecified ISIS leaders so they could be disseminated online over the internet. Additionally, CW-1 stated that FLUKE-EKREN taught extremist doctrine in the city of Ablah, and was responsible for

⁵ Abu Bakr al-Baghdadi has led ISIS during all the material events set forth in this affidavit and continues to lead the terrorist organization today. On or about July 5, 2014, in a rare public address within a mosque in Mosul, Iraq, al-Baghdadi declared the Islamic State a caliphate and he anointed himself the caliph, or leader, of the organization.

training women and children on the use of weapons there, to include automatic firing AK-47 assault rifles and explosive suicide belts.

B. Information Provided by CW-2

12. In or about 2014, a cooperating witness (hereinafter, “CW-2”),⁶ traveled to Turkey from the United States in order to meet a former prominent ISIS militant (hereinafter, “ISIS Individual-A”). CW-2 was smuggled from Turkey into Syria by ISIS. While in Syria, ISIS Individual-A introduced CW-2 to FLUKE-EKREN, whom CW-2 knew as “Umm Mohammed,” (also spelled as “Umm Mohammad”) in the city of Tabqah, Syria.⁷

13. ISIS Individual-A introduced CW-2 to FLUKE-EKREN to learn more about ISIS and become more sympathetic to ISIS. CW-2 visited FLUKE-EKREN’s house multiple times during the summer of 2014, which was located within walking distance of CW-2’s residence. During these visits, CW-2 believed that FLUKE-EKREN was in the process of vetting CW-2 to assess CW-2’s allegiance to ISIS and determine if CW-2 was a spy. CW-2 stated that FLUKE-EKREN told CW-2 that her family is from the Midwest and that she was a teacher in the United States before coming to Syria. The FBI has independently corroborated these details about FLUKE-EKREN’s familial and employment background through other witnesses.⁸

⁶ CW-2 pleaded guilty to providing false statements to the U.S. Government involving international terrorism. CW-2 received a sentence reduction for cooperating with the government. Although CW-2 did not initially disclose in 2014 that CW2 intended to travel to Syria to meet an ISIS member, CW-2 has since provided truthful and reliable information that has been extensively corroborated by multiple forms of evidence. Pursuant to the cooperation agreement, CW-2 is subject to breach if CW-2 provides false information.

⁷ CW-2 explained that, in 2014, Tabqah was an ISIS-controlled city. While residing there, CW-2 observed ISIS fighters who carried machine guns on a daily basis, ISIS flags on buildings, and checkpoints that controlled who came in and out of the city.

⁸ While CW-2 did not positively identify older photographs of FLUKE-EKREN, those photographs were dated and depicted FLUKE-EKREN wearing glasses with her head covered.

14. CW-2 observed that FLUKE-EKREN's residence often had automatic firing AK-47 assault rifles lying around in various parts of the dwelling. CW-2 learned from FLUKE-EKREN that her husband at that time, who FLUKE-EKREN said she met in the United States, was a sniper trainer for ISIS. CW-2 stated that ISIS women were encouraged to have weapons in their home, even when their husbands were not present, in order to defend ISIS-controlled territory against Al-Nusra (a competing terrorist organization at the time) or the Syrian Army. On one occasion, CW-2 observed one of FLUKE-EKREN's sons, who FLUKE-EKREN said was approximately five or six-years-old at the time, holding a machine gun. CW-2 also stated that FLUKE-EKREN was raising another child whose mother and father had both participated in a suicide bombing together in Syria on behalf of ISIS, according to what FLUKE-EKREN told CW-2.

15. According to CW-2, FLUKE-EKREN's abode was located in a neighborhood where there were ISIS flags in the area and it was common to hear gunfire or explosions. CW-2 also observed that ISIS fighters who carried automatic AK-47 rifles were omnipresent throughout the community. CW-2, who claimed to have never joined ISIS, stated that the local Syrian population was fully disarmed by ISIS in order to subjugate and control them.

CW-2 did identify a more recent, unobstructed photograph of FLUKE-EKREN. Your affiant is confident that CW-2 has met FLUKE-EKREN. Unbeknownst to CW-2, details provided by CW-2 about FLUKE-EKREN have been independently corroborated by other eyewitnesses. Additionally, CW-2 positively identified at least one of FLUKE-EKREN's children. CW-2 described "Umm Mohammed" as the only American and the only "white, Western woman" from the United States that CW-2 met in Syria. CW-2 did not meet anyone else who used that *kunya* (or alias). Furthermore, beyond FLUKE-EKREN, your affiant is unaware of any other American women who resided in Tabqah, Syria during the summer of 2014.

C. Information Provided by CW-3

16. On different occasions, U.S. investigators interviewed a cooperating witness (hereinafter, "CW-3"),⁹ who is one of FLUKE-EKREN's family members. At various times, CW-3 had been near FLUKE-EKREN in ISIS-controlled territory within Syria and Iraq since at least 2014.

17. CW-3 described FLUKE-EKREN as a jihadist and an ISIS member who speaks English, Arabic, Turkish, and Spanish. According to CW-3, FLUKE-EKREN does not like America or Americans. FLUKE-EKREN discussed conducting an attack in the United States. FLUKE-EKREN explained that she could go to a shopping mall in the United States, park a vehicle full of explosives in the basement or parking garage level of the structure, and detonate the explosives in the vehicle with a cell phone triggering device. CW-3 stated that FLUKE-EKREN did not pursue such an attack because her now-deceased husband objected. However, CW-3 indicated that FLUKE-EKREN admitted that she fantasized about conducting other attacks, and that FLUKE-EKREN believed a location was a good target if it contained large amounts of congregating people. Additionally, FLUKE-EKREN stated that she considered any attack that did not kill a large number of individuals to be a waste of resources. CW-3 observed that when FLUKE-EKREN would hear about external attacks taking place in countries outside the United States, FLUKE-EKREN would comment that she wished the attack occurred on United States soil instead.

⁹ CW-3 is not a paid source. However, the U.S. government has provided certain logistical benefits to CW-3. CW-3 initially provided false information about FLUKE-EKREN to law enforcement out of what CW-3 described as fear. However, since CW-3's initial interviews, CW-3 has provided truthful and reliable information about FLUKE-EKREN that has been extensively corroborated by multiple forms of evidence, including evidence that CW-3 does not know about.

18. According to CW-3, in or about 2012, FLUKE-EKREN moved to Raqqa, which your affiant knows was the former headquarters of ISIS in Syria. In or about early 2016, CW-3 learned that an airstrike killed FLUKE-EKREN's former husband in Tell Abyad, Syria as he was attempting to conduct a terrorist attack on behalf of ISIS. In or about late 2016, CW-3 learned that FLUKE-EKREN married a Bangladeshi ISIS member who specialized in drones. According to CW-3, this individual built drones for ISIS and was working on two projects prior to his death in or about late 2016 or early 2017. The first project involved creating a plan to conduct an attack outside of the Islamic State. The second project involved attaching chemical weapons onto drones to drop chemical bombs from the air. CW-3 also learned that, approximately four months after the death of the ISIS drone expert, FLUKE-EKREN married a prominent ISIS military leader who has been responsible for ISIS's defense of Raqqa.

19. CW-3 further observed that in or about late 2016, the "Wali" (or mayor) of Raqqa permitted the opening of the "Khatiba Nusaybah," which is a military battalion comprised solely of female ISIS members who are married to male ISIS fighters.¹⁰ CW-3 stated that FLUKE-EKREN initially joined "Khatiba Nusaybah" by attending meetings at the direction of the "Wali" of Raqqa, and shortly thereafter, became the leader and organizer for the group. FLUKE-EKREN's main objective in this role was to teach the women of ISIS how to defend themselves against ISIS' enemies. There were multiple training locations throughout Raqqa, and FLUKE-EKREN would go to each location to see how the ISIS training was progressing.

20. According to CW-3, one of FLUKE-EKREN's initiatives as leader of the Khatiba Nusaybah was to form a section of "Inghimasiyin" and a section of "Istihadi." CW-3 stated that

¹⁰ In this context, Khatiba (or Katiba) is a term that is used to refer to an ISIS military battalion. Khatiba Nusaybah is also referred to by other CWs as "Nusaybah Battalion."

Inghimasiyin are fighters who sneak into and infiltrate enemy positions with AK-47s, and detonate grenades and an explosive suicide belt when they run out of ammunition. Istihadi fighters are suicide bombers who use vehicle-borne improvised explosive devices (VBIEDs) on enemy positions. While the establishment of the Inghimasiyin and Istihadi sections never materialized, CW-3 stated that FLUKE-EKREN still succeeded in getting several ISIS women trained in the use of automatic firing AK-47s, grenades, and explosive suicide belts.

D. Information Provided by CW-4

21. U.S. government investigators interviewed a cooperating witness (hereinafter, “CW-4”) who had direct and regular access to FLUKE-EKREN over a period of several months in or about 2016.¹¹ CW-4 independently corroborated the fact that FLUKE-EKREN was the ISIS emir for the Nusaybah Battalion. CW-4 noted that when FLUKE-EKREN was in charge of the all-female military battalion, she was known to all in ISIS as “Umm Mohammed.”

22. In one instance, FLUKE-EKREN asked CW-4 to assist her in translating a document from English into CW-4’s native language. CW-4 recalled that the document “decreed the establishment of, and requirements for, the Nusaybah Battalion.” This document was stamped with the official ISIS seal. CW-4 stated that the last time she saw FLUKE-EKREN was in approximately mid-2017. At that time, FLUKE-EKREN informed CW-4 that she was headed to Mayadin, Syria because ISIS ordered her and her current husband to go there.

¹¹ CW-4 is not a paid source. The U.S. government has not provided any material benefits or made any promises to CW-4. To the best of your affiant’s knowledge, CW-4 remains detained in a foreign prison camp for former ISIS members. Repatriation discussions between the group holding CW-4 and CW-4’s country of origin are ongoing. CW-4 voluntarily provided all information to the U.S. government, and has agreed to assist the U.S. government in the future.

E. Information Provided by CW-5

23. U.S. Government investigators interviewed a cooperating witness (hereinafter, “CW-5”) who had direct and regular access to FLUKE-EKREN over a period of several days in or about the early summer of 2017.¹² CW-5 became involved with the Nusaybah Battalion while living in Raqqa in early 2017. CW-5 described the Nusaybah Battalion as an all-female ISIS military unit. CW-5 believed that the intent behind its creation was to train the women of ISIS to fight.

24. As a member of the Nusaybah Battalion, CW-5 attended three days of ISIS training just prior to Ramadan in 2017.¹³ CW-5 identified one of the training instructors as “Umm Mohammed al-Amriki.” When investigators displayed a series of photos of FLUKE-EKREN, CW-5 confirmed that she was the same person who CW-5 knew as Umm Mohammed al-Amriki. CW-5 stated that ISIS mandated all women who were staying in Raqqa during the siege¹⁴ to attend the training. CW-5 and the other women were instructed on physical training, medical training, VBIED driving courses, religious classes, and how to pack and prep a “go bag”

¹² CW-5 is not a paid source. The U.S. government has not provided any material benefits or made any promises to CW-5. To the best of your affiant’s knowledge, CW-5 remains detained in a foreign prison camp for former ISIS members as repatriation discussions between the group holding CW-5 and CW-5’s country of origin continue. CW-5 voluntarily provided all information to the U.S. government, and has agreed to assist the U.S. government in the future. CW-5 has been charged with terrorism offenses by CW-5’s country of origin. An active Interpol Red Notice exists for CW-5 who, if returned to CW-5’s country of origin, would likely face prosecution. The FBI has shared information gathered from interviews with CW-5 with that country’s government.

¹³ In 2017, Ramadan began on or about May 27, 2017.

¹⁴ The siege was launched by the Syrian Democratic Forces (“SDF”) against ISIS with an aim to seize Raqqa, the former de facto capital of ISIS in Syria. The battle began on or about June 6, 2017 and concluded on or about October 17, 2017, at which point the SDF regained controlled of Raqqa.

with rifles and other military supplies. Some of these classes were taught by FLUKE-EKREN. CW5 observed that the leaders of ISIS and the other members of the Nusaybah Battalion were proud to have an American instructor. CW5 recalled that, through the entirety of training sessions, FLUKE-EKREN carried an automatic firing AK-47 assault rifle.

F. Information Provided by CW-6

25. U.S. government investigators interviewed a cooperating witness (hereinafter, “CW-6”) who had direct and regular access to FLUKE-EKREN over a period of several months between late 2015 until early 2016.¹⁵ While living in Raqqa in early 2016, CW-6 served as a translator for the Nusaybah Battalion, translating information to and from Arabic into CW-6’s native language.

26. Additionally, Nusaybah Battalion leadership tasked CW-6 with assisting in the recruitment of new members. CW-6 identified an individual involved in running the Nusaybah Battalion women’s center in Raqqa, and who, according to CW-6, was also involved in training for the Nusaybah Battalion. CW-6 knew this individual as “Umm Mohammed,” and described her as a mother who was pregnant and married to a Bangladeshi man at the time. When investigators displayed a series of photos of FLUKE-EKREN, CW-6 confirmed that she was the same person CW-6 knew as Umm Mohammed. The FBI is independently aware that in or about 2016, FLUKE-EKREN had children, was pregnant, and was married to an ISIS fighter from Bangladesh.

¹⁵ CW-6 is not a paid source. The U.S. government has not provided any material benefits or made any promises to CW-6. CW-6 is a citizen of a foreign country and was returned to that country from Syria. CW-6 voluntarily provided all information to the U.S. government, and has agreed to assist the U.S. government in the future. CW-6 has been charged with terrorism offenses in CW-6’s country of origin. The FBI has shared information gathered from interviews with CW-6 with that country’s government.

G. ISIS Evidence Recovered on the Battlefield

27. In early 2018, the FBI took custody of battlefield evidence that was recovered during an operation conducted by military partners in Syria. The evidence included several pages of hand written documents that appear to contain the hallmarks of an ISIS Sharia exam.¹⁶ A hand written, English language, exam was recovered with the name “Umm Mohammed al-Amriki” written on each page. This name is a known *kunya* (or alias) that has been used by FLUKE-EKREN. Additionally, the hand-writing on the exam appears to be consistent with other exemplars of FLUKE-EKREN’s hand-writing that were obtained from FLUKE-EKREN’s family and through certain U.S. government records.

¹⁶ Your affiant is aware that, when aspiring ISIS members entered Syria from in or about 2014 through in or about 2016 to join the terrorist organization, it was customary for an exam to be administered by ISIS in order to gauge a recruit’s knowledge of Islamic jurisprudence. The results of this exam would identify the volume of Sharia training required for the ISIS recruit.

CONCLUSION

28. The foregoing demonstrates that FLUKE-EKREN provided and conspired to provide material support or resources, including personnel (including herself) and services, to ISIS, a designated foreign terrorist organization

29. Accordingly, there is probable cause to believe that from at least in or about 2014, up to and including the date of this affidavit, both dates being approximate, the defendant ALLISON FLUKE-EKREN, and others known and unknown to your affiant, knowingly and unlawfully provided, and conspired to provide, material support or resources to a foreign terrorist organization, namely ISIS, knowing that the organization was a designated foreign terrorist organization, and knowing that the organization had engaged in and was engaging in terrorist activity.



David C. Robins, Special Agent
Federal Bureau of Investigation

Sworn and subscribed to before me this 15 day of May, 2019.



/s/
Theresa Carroll Buchanan
United States Magistrate Judge

The Honorable Theresa Carroll Buchanan
United States Magistrate Judge

Alexandria, Virginia