

# EXHIBIT B

**FILED**  
**DEC 12 2014**  
Clerk, U S. District and  
Bankruptcy Courts

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)	<b>UNDER SEAL</b>
	)	
v	)	CRIMINAL NO 14-230(RC)
	)	
DANIELA GREENE	)	
	)	
Defendant	)	

**GOVERNMENT'S PROFFER OF PROOF IN  
SUPPORT OF DEFENDANT'S PLEA OF GUILTY**

The United States of America, by its attorney, the United States Attorney for the District of Columbia, respectfully submits the following Proffer of Proof in Support of a Proposed Plea of Guilty by the defendant to count one in the indictment in the above-captioned matter

**I. ELEMENTS OF THE OFFENSE**

To sustain a conviction for a violation of 18 U S C 1001, the government must prove the following

- (1) a statement was made,
- (2) the statement was false,
- (3) the statement was material,
- (4) the statement was made with the specific intent to mislead or deceive, and
- (5) the statement was within the jurisdiction of an agency of the United States

To qualify for the enhanced penalty, the government must prove that the offense involves international or domestic terrorism as defined in section 2331

## II. SUMMARY OF FACTS

1 On or before February 03, 2011, Greene, who speaks and writes fluent German, was hired by the FBI as a Contract Linguist and granted a Top Secret security clearance

2 In or around January 2014, Greene began working with the Detroit Division of the FBI in an investigative capacity. Some of her duties involved support of an investigation against a German national, located in Syria, hereinafter referred to as "Individual A." Individual A is a leader of an al-Qaeda-inspired Salafist terrorist organization that is banned [REDACTED] due to the participation of its members in violent protests. At all times pertinent to this case, Individual A was located in Syria and was a member of the Islamic State of Iraq and the Levant (hereinafter referred to as "ISIL"). ISIL is a foreign terrorist organization, currently attempting to establish a caliphate in Syria and other portions of the Middle East through violent terrorist activity. ISIL is designated by the U.S. State Department as a Foreign Terrorist Organization and was so designated at all times relevant to this case.

3 During the period of Greene's work in support of the investigation into Individual A, Individual A announced his sworn allegiance to ISIL, and called on Muslim fighters from all over the world to come to Syria to support the group. He made these statements in articles and videos published on Twitter and other online sources. At all relevant times, Greene was aware that Individual A was a member of ISIL, that he was engaging in acts of terrorism, that ISIL was engaging in terrorism and that ISIL was designated by the U.S. State Department as a Foreign Terrorist Organization.

4 On or about June 11, 2014 Greene told her FBI supervisor and the Chief Security Officer (“CSO”) at the Indianapolis Division of the FBI that she intended to travel to [REDACTED] Germany to see her family on June 21, 2014. Prior to her travel, Greene was required to submit an FD-772, Report of Foreign Travel form, a requirement for all FBI employees and contractors who hold National Security clearances. The purpose of the form is to identify and minimize the potential risks of unofficial foreign travel, both to FBI personnel and to national security and sensitive information.

5 Greene submitted and electronically signed an FD-772, Report of Foreign Travel form, on or about June 11, 2014. On the FD-772, Greene reported her intention to travel to [REDACTED] Germany on June 21, 2014. Greene listed her travel as “Vacation/Personal” and described the reason for her late submission of the form as “Want to see my family [REDACTED] [REDACTED]” Greene listed her parents as her destination contacts and her scheduled return date as July 4, 2014.

6 On or about June 18, 2014, Greene’s FD-772 was approved by a security officer in the Indianapolis Division. An original copy of the FD-772 was then printed out and sent to the Records Management Division (RMD) at the J. Edgar Hoover Building (FBI Headquarters) located within the District of Columbia.

7 Greene’s statements on the FD-772 that she intended to travel to Germany were false. Instead, her intent was to travel to Turkey, and subsequently to Syria, to meet up with Individual A. She did, in fact, leave for Turkey on June 23, 2014.

8 On or about June 9, 2014, three days before Greene submitted her falsified FD-772 form, a debit card issued to Greene was used to purchase tickets in Greene's name for round trip travel from Indianapolis to Gaziantep, a city in Turkey located fewer than 20 miles from the Syrian border. Greene was scheduled to fly from Indianapolis through Chicago on June 13, 2014 and arrive in Gaziantep, Turkey the following day. Greene's return trip was scheduled to depart from Turkey approximately 26 hours after her arrival. No part of Greene's planned or ticketed travel was through or in Germany.

9 On or about June 13, 2014 - the day she had been scheduled to depart and two days after submitting her FD-772 form - the same debit card issued to Greene was used to purchase tickets in Greene's name for one-way travel on Air Canada flight 7310 on June 23, 2014 from Indianapolis to Istanbul, Turkey, with a stop-over in Toronto. Greene purchased no return tickets. No part of Greene's planned or ticketed travel was through or in Germany.

10 On June 23, 2014, Greene departed on Air Canada Flight 7310 to Istanbul [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

11 Upon arrival in Gaziantep, Greene made arrangements through contact with Individual A to have a third party assist her in crossing the Syrian border so as to join Individual A. On or about June 27, 2014, Greene met up with Individual A in Syria, married him, and thereafter lived with him for a period of over 30 days. During that time, Individual A was an active member of ISIL, and engaged in combat against other military forces on behalf of ISIL.

During their interactions, Greene informed Individual A that she was employed by the FBI and that the FBI had an open investigation into his activities

12 [REDACTED] In July 2014, while in Syria, Greene wrote several emails [REDACTED], which revealed her knowledge that she had committed a criminal act. On July 8, 2014, she sent the following in an email [REDACTED]

“I am having trouble with my phone and responding to your messages”

“I was weak and didnt know how to handle anything anymore  
I really made a mess of things this time”

On or about July 09, 2014, Greene wrote another e-mail [REDACTED]

“ I am gone and I can't come back I am in Syria. Sometimes I wish I could just come back I wouldn't even know how to make it through, if I tried to come back I am in a very harsh environment and I don't know how long I will last here, but it doesn't matter, it's all a little too late ”

On or about July 22, 2014, Greene wrote an e-mail [REDACTED]

“Not sure if they told you that I will probably go to prison for a long time if I come back, but that is life I wish I could turn back time some days God willing I can arrange things, but better to write my mother in my mother tongue only, few people can read that ”

13 Greene returned to the United States on Wednesday, August 6, 2014. At no time during the preceding period of travel did she visit Germany

14 Daniela Greene made false statements to the FBI through her FD-772 form regarding her intended itinerary for travel. These misstatements were material to a matter within the jurisdiction of the FBI because they masked her intent to travel to Syria to meet Individual A, an ISIL member. Such travel plans by an FBI employee, had they been revealed to the FBI, would have resulted in a prohibition on such travel and possibly additional administrative actions

against Greene As an employee of the FBI, and at all times relevant to this case, Greene knew that making material false statements on official forms was unlawful

Respectfully submitted,

RONALD C MACHEN JR  
UNITED STATES ATTORNEY  
D C Bar # 447889

BY



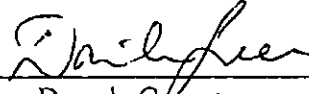
THOMAS A GILLICE  
Assistant United States Attorney  
D C Bar # 452336  
555 4<sup>th</sup> Street, NW  
Washington, DC 20530  
202-252-1791

***Defendant's Acceptance***

I have read each of the pages which constitute the government's Proffer of Proof and have discussed it with my attorney, Shawn Moore, Esquire I fully understand this proffer and agree to it without reservation I do this voluntarily and of my own free will, intending to be legally bound No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this agreement fully

I reaffirm that absolutely no promises, agreements, understandings, or conditions have been made or entered into in connection with my decision to plead guilty except those set forth in my plea agreement I am satisfied with the legal services provided by my attorney in connection with this proffer and my plea agreement and matters related to it


Date 12-12-14

  
\_\_\_\_\_  
Daniela Greene  
Defendant

***Attorney's Acknowledgment***

I have read each of the pages which constitute the government's Proffer of Proof, reviewed them with my client, and discussed the provisions of the proffer with her, fully These pages accurately and completely set forth the government's proof as I understand it

Date December 12, 2014

  
\_\_\_\_\_  
Shawn Moore, Esquire  
Attorney for Daniela Greene