

United States Courts
Southern District of Texas
FILED

June 29, 2022

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

UNITED STATES OF AMERICA

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§

CRIMINAL No. G-19-02-S

VS.

WARREN C. CLARK

Defendant.

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

**Providing and Attempting to Provide Material Support to a Designated
Foreign Terrorist Organization
(Title 18, United States Code, §2339B)**

Beginning in or about 2011 and thereafter, the exact date being unknown to the Grand Jury, and continuing until in or about October 2015, the exact date being unknown to the Grand Jury, within the Southern District of Texas, and elsewhere, the defendant

WARREN C. CLARK,

a national of the United States, did knowingly provide, and attempt to provide, material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), to wit: personnel, specifically himself, 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 Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIS was a designated foreign terrorist organization and knowing that the organization has engaged in and engages in terrorist activity and terrorism, all in violation of Title 18, United States Code, Section 2339B(a)(1) and Title 18, United States Code, Section 2.

COUNT 2

**Conspiring to Provide Material Support to
a Foreign Terrorist Organization
(Title 18 U.S.C. § 2339B(a)(1))**

Beginning at least as early as in or about March 2015, the exact date being unknown to the Grand Jury, and continuing until in or about July 2015, the exact being unknown to the grand jury, in the Southern District of Texas, and at a place outside the United States, including Turkey, and elsewhere, the defendant

WARREN C. CLARK

a national of the United States, did knowingly combine, conspire, confederate, and agree with another person, known to the Grand Jury, to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), to wit: personnel 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 Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIS was a designated foreign terrorist organization and knowing that the organization has engaged in and engages in terrorist activity and terrorism, all in violation of Title 18, United States Code, Section 2339B(a)(1).

A TRUE BILL

Original Signature on File
FOREPERSON OF THE GRAND JURY

JENNIFER B. LOWERY
United States Attorney
Southern District of Texas

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