

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

2018 JAN 31 PM 4:03

CLERK, US DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS FLORIDA

UNITED STATES OF AMERICA

2: 18-cr-19-FTM-99CM

v.

Case No. 2:18-cr-

ALISON MARIE SHEPPARD,
a/k/a "Aiisha Abdullah"

18 U.S.C. § 2339B(a)(1); § 2

INDICTMENT

The Grand Jury charges:

Introduction

1. At all times material to the charge herein:

a. On or about October 15, 2004, the United States Secretary of State designated al Qaeda in Iraq, then known as Jam'atal Tawhid wa'al-Jihad, as a Foreign Terrorist Organization under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224.

b. On or about May 15, 2014, the Secretary of State amended the designation of al Qaeda in Iraq as a Foreign Terrorist Organization 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 Foreign Terrorist Organization listing: the Islamic State of Iraq and al-Sham ("ISIS"), the Islamic State of Iraq

and Syria, ad-Dawla al-Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. In an audio recording publicly released on or about June 29, 2014, ISIS announced a formal change of its name to the Islamic State.

c. On or about September 21, 2015, the Secretary of State added the following aliases to the Foreign Terrorist Organization listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated Foreign Terrorist Organization.

COUNT ONE

(Attempt to Provide Material Support and
Resources to a Foreign Terrorist Organization)

2. From a date unknown, but at least by in or about January 2017, through on or about July 18, 2017, in the Middle District of Florida and elsewhere, the defendant,

ALISON MARIE SHEPPARD,
a/k/a "Aiisha Abdullah,"

did knowingly attempt to provide material support and resources, as defined in 18 U.S.C. § 2339A(b), to wit: property and communications equipment, namely, ten cellular telephones, to a Foreign Terrorist Organization, namely, ISIS, knowing that ISIS was a designated Foreign Terrorist Organization and that ISIS had engaged in and was engaging in terrorist activity and terrorism.

All in violation of 18 U.S.C. § 2339B(a)(1) and § 2.

FORFEITURE

The allegations contained in Count One are incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. §§ 981(a)(1)(C) and (G) and 28 U.S.C. § 2461(c).


1. Upon conviction of the violation of 18 U.S.C. § 2339B(a)(1), the defendant shall forfeit to the United States, pursuant to 18 U.S.C. §§ 981(a)(1)(C) and (G) and 28 U.S.C. § 2461(c), (a) any property, real and personal, which constitutes and is derived from proceeds traceable to the violation, and (b) all assets, foreign and domestic, (i) of the defendant, (ii) acquired and maintained by the defendant with the intent and for the purpose of supporting, planning, conducting, and concealing the violation, and (iii) derived from, involved in, and used and intended to be used to commit the violation.

2. 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 under the provisions of 21 U.S.C. § 853(p).

A TRUE BILL,




Foreperson

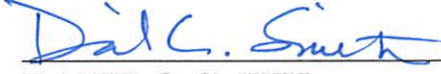
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By: 

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No. 2:18-cr-

UNITED STATES DISTRICT COURT
Middle District of Florida
Fort Myers Division

THE UNITED STATES OF AMERICA

vs.

ALISON MARIE SHEPPARD
a/k/a "Alisha Abdullah"

INDICTMENT

Violation: 18 U.S.C. § 2339B(a)(1) and § 2

A true bill,


Foreperson

Filed in open court this 31st day
of January, 2018

Clerk

Bail \$ _____