

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**
Richmond Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal Action No. 3:17-cr-123
)	Hon. John A. Gibney, Jr.
CASEY CHARLES the defendant,)	
)	
<i>Defendant.</i>)	Sentencing: February 12, 2018

GOVERNMENT’S NOTICE OF EXPERT TESTIMONY

The United States provides this Notice of Expert Testimony pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G) and Rules 602, 702, 703, and/or 705 of the Federal Rules of Evidence. It is anticipated that the government will offer the expert testimony described below during the sentencing hearing in this case.

Terrorism Expert

At sentencing, the government anticipates that William Braniff will be called to testify as an expert witness in the field of terrorism, including the study and research of terrorist organizations, such as the Islamic State of Iraq and al-Sham (“ISIS”). Mr. Braniff was recently qualified as a terrorism expert in June 2017 in the U.S. District Court for the Eastern District of Virginia (Alexandria) in *United States v. Mohamad Jamal Khweis*, 1:16-CR-143-LO. Defense counsel has been provided a transcript of Mr. Braniff’s testimony from that trial, as well as transcripts of other proceedings in the government’s possession, in which he testified as an expert.

Mr. Braniff earned a Bachelor of Science degree from the United States Military Academy at West Point, and a Master’s degree in International Relations, Strategic Studies and

International Economics from Johns Hopkins University, School of Advanced International Studies. While at Johns Hopkins, Mr. Braniff's studies included: Foundations of Jihadist Terrorism, History of Irregular Warfare, and the Art and Practice of Intelligence. In the United States Army, he served as an Armor Company Commander, Armor Battalion Scout Platoon Leader, Armor Company Executive Officer, and Platoon Leader.

Mr. Braniff currently serves as the Executive Director and Professor of the Practice of the National Consortium for the Study of Terrorism and Responses to Terrorism at the University of Maryland. As Executive Director, he oversees researchers and other personnel active in an international research consortium working on extensive projects related to causes and consequences of terrorism and extremist violence. Previously, Mr. Braniff was an Instructor in Terrorism Studies at the United States Military Academy at West Point. Mr. Braniff's *curriculum vitae* is attached.

Mr. Braniff will be called to testify as an expert in the global jihadist movement as it relates to ISIS. Mr. Braniff will discuss how individuals in the United States become radicalized and prepare to travel to the "Islamic State," to include attempting or making contact with individuals overseas, such as ISIS sympathizers, ISIS facilitators, and/or ISIS fighters. In particular, he is expected to testify about ISIS's history and evolution within the global jihadist movement; its structure; its announcement of a caliphate; its strategic goals and violent ideology; its presence in Syria, Iraq, Afghanistan, the Philippines, and elsewhere; its various aliases and its designation as a Foreign Terrorist Organization; and methods and means, including current and historical sources and influences on ISIS's ideology; recruitment of new ISIS supporters and members; ISIS's use of the Internet/social media as a recruitment tool; and methods of communication used by ISIS and its supporters and members.

Mr. Braniff is also expected to testify that those who are radicalized (particularly individuals who have prior criminal records) will undertake, or attempt to undertake, violent acts domestically on behalf of terrorist organizations, and that radicalized individuals do not exclusively seek to travel overseas to wage “jihad.” In addition, Mr. Braniff will opine about the meaning of certain terminology or jargon used by the defendant and/or individuals with whom he was communicating by telephone and through the Internet/social media in the weeks prior to his arrest on August 31, 2017. Mr. Braniff will explain certain evidence the government will offer in connection with the defendant’s sentencing, such as the tattoo of the ISIS flag on the defendant’s back, and the Procession of Light ISIS video that the defendant discussed on or about August 27, 2017 on a recorded telephone call. Mr. Braniff will also testify about ISIS-related images located on the defendant’s Facebook account, and certain words (such as *hijrah*, *mujahid*, and other terms) that he and others with whom he communicated used on Facebook and during recorded telephone calls with still-incarcerated inmates. These materials, which were previously provided to defense counsel in discovery, reference words, concepts, individuals, and places that are well-known to students of global jihad and terrorism but are unfamiliar to ordinary people.

Mr. Braniff will also discuss the role of prominent figures in ISIS, such as Abu Bakr al-Baghdadi (to whom the defendant swore an oath of allegiance, as referenced in the Statement of Facts that was signed and filed on November 3, 2017 in connection with the defendant’s guilty plea in this case). *See* ECF No. 18 at 2. Mr. Braniff’s experience in this field and his academic writings on these subjects, as extensively detailed in his *curriculum vitae*, will serve as the bases for his testimony and opinions.

Respectfully submitted,

Dana J. Boente
United States Attorney

By: _____ /s/
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William Braniff

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Objective

- Public-service driven leadership within and intellectual contribution to the field of terrorism and counterterrorism

Education

MASTERS DEGREE | MAY 2006 | JOHNS HOPKINS SCHOOL OF ADVANCED INTERNATIONAL STUDIES

- Major: Strategic Studies
- Minor: International Economics

BACHELORS OF SCIENCE | MAY 1999 | UNITED STATES MILITARY ACADEMY AT WEST POINT

- Major: Arts, Philosophy and Literature
- Minor: Computer Science

Skills & Abilities

LEADERSHIP

RELATIONSHIP BUILDING

TEACHING

DELEGATION

COLLABORATION

PUBLIC SPEAKING

Experience

EXECUTIVE DIRECTOR | PROFESSOR OF THE PRACTICE | NATIONAL CONSORTIUM FOR THE STUDY OF TERRORISM AND RESPONSES TO TERRORISM (START) | FEBRUARY 2012 – CURRENT DAY

- Leads the largest terrorism research, education and training center in the country, comprised of 70 full-time staff, 40 hourly employees, and 100 undergraduate and graduate student interns
- Grew the organization from 22 employees and 18 interns, and an annual budget of \$4.5M to an annual budget of \$12.8 M in four years
- Collaborate with and oversee approximately 50 researchers active in the international research consortium working on multi-year projects related to the human causes and consequences of terrorism and extremist violence
- Serve as the primary liaison to START's government partners, including DHS, DOJ, DOD, DOS, FBI, NCTC
- Architect and prime mover of START's "transition" strategy intended to optimize the relevance of START's research for practitioners and policy-makers through education, training, media and public speaking engagements
- Briefed the President of the United States, the Secretary of Defense, two Secretaries of Homeland Security, testified before Congress on three occasions, and serve as an expert witness in federal terrorism trials
- Teaches two undergraduate courses, including the first course in the country on Countering Violent Extremism, as well as a Massive Open Online Course that has enrolled over 50,000 students globally

DIRECTOR OF PRACTITIONER EDUCATION | COMBATING TERRORISM CENTER | SEPTEMBER 2007-FEBRUARY 2012

- Responsible for the development and execution of a counterterrorism curriculum for multiple government entities engaged in the counterterrorism mission, to include the FBI, CIA, DHS ICE, DoD, and state, local and tribal law enforcement
- Grew the Practitioner Education Program from \$1.1M to \$3.4M per year in four years
- Led the FBI-CTC Collaborative, a multi-million dollar educational initiative delivering 23 semesters of counterterrorism education per fiscal year (900 hours of instruction for over 3000 students at 64 events across the nation) to the FBI along with a text book and additional educational materials
- Managed a team of approximately 25 academicians and retired practitioners
- Served as a West Point Instructor for the Terrorism Minor program in the Department of Social Sciences, as well as one of three primary instructors for the CTC's Practitioner Education Program

FOREIGN AFFAIRS SPECIALIST | NATIONAL NUCLEAR SECURITY AGENCY | JUNE 2006-SEPTEMBER 2007

- Foreign Affairs Specialist for the Office of International Nuclear Material Protection and Cooperation
- Responsible for strategic planning and sustainability issues regarding nuclear counter-terrorism programs at nuclear facilities within the Former Soviet Union
- Within 8 months in the office as a Nonproliferation Graduate Program Fellow, promoted to serve as the Special Assistant to the Director and Deputy Director (Senior Executive Service positions)

ARMOR OFFICER | UNITED STATES ARMY | MAY 1999-MAY 2004

- Company Commander: Responsible for the daily operations of and long term planning for an organization of fifty-five military and ten civilian personnel, as well as fifteen rifle and pistol ranges on which my company trained 10,000 initial entry soldiers annually
- Supervised the construction of a multi-million dollar indoor marksmanship training center and developed a plan to implement training at the facility
- Armor Battalion Scout Platoon Leader: Selected over thirty Lieutenants in the battalion to lead a thirty-three person reconnaissance platoon composed of ten combat vehicles and equipment valued at over \$1.5 million; Served as the battalion's expert on reconnaissance and security operations
- Armor Company Executive Officer: Supervised and led a sixty-five person tank company as second-in-command; As the company's logistics expert, was responsible for the maintenance of a combat vehicle fleet valued over \$35 million and including 14 M1A1 Abrams Main Battle Tanks
- Armor Company Platoon Leader: Led a sixteen person tank platoon for six months of training and a six month peacekeeping deployment in Kosovo; Worked independently with international organizations and foreign military units to foster a secure environment in a sector totaling over seventy square kilometers and inhabited by 1500 Albanian and Serbian Kosovars

Selected Publications

Terrorism and Political Islam, eds. William Braniff, Christopher Heffelfinger, and Erich Marquardt, Combating Terrorism Center, 2008.

Terrorism and Political Islam: A Desk-Side Reference for Political, Missionary, and Militant Organizations, eds. William Braniff, Christopher Heffelfinger, and Erich Marquardt, Combating Terrorism Center, 2009.

"Anticipating al-Qa'ida's Next Strategic Evolution" in *Understanding Jihadism: origins, evolution, and future perspectives*, eds. Brynjar Lia and Qandeel Siddique, Norwegian Defense Research Establishment, June 2009.

Bill Braniff and Assaf Moghadam, "Al Qaeda's Post-9/11 Evolution: An Assessment," in *Terrorism and Counterterrorism: Understanding the New Security Environment, Reading and Interpretations*, eds Russel Howard, Reid Sawyer, and Natasha Bajema, 4th edition, 2011.

Bill Braniff, & Assaf Moghadam. "Towards Global Jihadism: Al-Qaeda's Strategic, Ideological and Structural Adaptations since 9/11," in *Perspectives on Terrorism* [Online], 5.2 (2011): 11 June 2012.

William Braniff, "Beyond al-Qa'ida," START Discussion Point, November 2012.

"5 Questions with William Braniff on the State of al-Qaeda," War on the Rocks, February 2014.

William Braniff, "CVE: An Idea Whose Time has Come," START Discussion Point, September 2014.

William Braniff and Ryan Pereira, "A Tale of Two Caliphates," Multi-Method Assessment of ISIL, A Strategic Multilayer Assessment Periodic Publication, December 2014.

Stevan Weine and William Braniff, "Law Enforcement-Focused Best Practices to Prevent Violent Extremism," Research START Brief, 2015.

Stevan Weine and William Braniff, "Community-Focused Best Practices to Prevent Violent Extremism," Research START Brief, 2015.

Stevan Weine and William Braniff, "Report on the National Summit on Empowering Communities to Prevent Violent Extremism," Office of Community Oriented Policing Services, 2015.

William Braniff, "Communities Must Work Together to Combat Extremism," *Room for Debate*, The New York Times, June 2015.

Sheehan Kane and William Braniff, "Taking the Sinai Province of the Islamic State Seriously Without Helping it Destabilize Egypt," START Discussion Point, August 2015.

William Braniff, "Apple, the FBI, Extremists and Strategic Soft Targeting," War on the Rocks, March 30, 2016.

Stevan Weine and William Braniff, "Empowering Communities to Prevent Violent Extremism: A Report on the August 2014 National Summit," *The Handbook of the Criminology of Terrorism*, Wiley Press, November 2016.

William Braniff, "Recasting and Repositioning CVE as a Grand Strategic Response to Terrorism," START Discussion Point, November 2017.

Selected Presentations

"Exploring 9/11: The World Before and After," National September 11th Museum and Memorial Webcast on Al-Qa'ida's ideology, 2008, and on the death of Osama bin Laden, 2011.

"Anticipating al-Qa'ida's Next Strategic Evolution," Understanding Jihadism Conference, Norway, March 2009.

"Frameworks for Understanding Domestic Islamist Plots," National Collaboration and Development Course, Pennsylvania, 2010.

"Radicalization in the Salafi-Jihad," National Counterterrorism Center, Virginia, January 2010.

"Evolution of the Salafi-jihad," World Affairs Council, Norfolk, Virginia, March 2010.

"Conceptual Frameworks for Understanding al-Qa'ida," Council on Foreign Relations, Georgia, April 2010.

"Understanding al-Qa'ida," Committee on Foreign Relations, Indianapolis, Indiana, June 2010.

"Al-Qa'ida in Context," Joint Forces Staff College, Norfolk, VA, July 2010.

"Understanding the Enemy," National September 11th Museum & Memorial Lecture Series, New York, June 2010.

"Economic Jihad: Al-Qa'ida's Attrition Strategy," Wal-Mart Home Office, Bentonville, Arkansas, July 2010.

"Introduction to START Data, Methodology and Finding," National Science and Technology Council's Subcommittee on Human Factors, March 2012.

Congressional Testimony to House Committee on Homeland Security Subcommittee on Oversight and Management Efficiency, "Why Can't DHS Better Communicate with the American People?" May 2013.

Congressional Testimony to House Armed Services Committee, "The State of Al-Qaeda, its Affiliates, and Associated Groups: View from Outside Experts," February 2014.

"Countering Violent Extremism," National Counterterrorism Center, April 2014.

Congressional Testimony to House Armed Services Committee, "The State Islamic Extremism," February 2015.

"An Empirical Approach to Countering Violent Extremism," White House Summit on Countering Violent Extremism, February 2015.

"Radicalization & Foreign Fighters," United Nations Counter Terrorism Executive Directorate, February 2015.

"How Research Can Contribute to Understanding CVE and Foreign Fighters," Global Counterterrorism Forum Foreign Fighter Working Group Meeting, February 2015.

"CVE: The Ends, Not the Means," International Institute for Counterterrorism, Israel, September 2015.

"The Dynamic Terrorist Threat: Competition, Innovation and Mobilization," Panel Presentation, Transportation Security Administration Conference, June 2016.

"U.S. National Security Policy with respect to ISIS," Davidson College Summer in Washington Program, July 2016.

Selected Media Appearances

"FBI takes counterterrorism classes, National Public Radio, July 2008.

"Al-Qaida Media Blitz has Some on Alert," National Public Radio, April 2009.

"Assessing Somalia's Terror Threat," International Relations and Security Network, December 2009.

KCUR *Up to Date* interview with Steve Kraske on al-Qaeda, Kansas City, Missouri, April, 2010.

"In Attack, Al Qaeda-Linked Somali Group Expands Reach," Wall Street Journal, July 2010.

"Choosing From the Many Lessons of Sept. 11," an expert panel discussion, New York Times, June 4, 2012.

"Death of al-Libi is a crippling blow," AFP article, June 5, 2012.

"Drones could destabilize Pakistan," AFP video, June 6, 2012

Terrorism and Violent Crime," CSPAN's Washington Journal, April 2013.

"Maryland Voices React to Boston Marathon Bombing," Maryland Morning (NPR WYPR), April 2013.

"Public Safety: The Measures Taken To Keep Crowds Safe," Talk of the Nation (NPR), April 2013.

"Social Media Shapes Boston Bombings Response," National Geographic, April 2013.

"Response to Boston Marathon Attack," Fox News, April 2013.

"Boston attack underscores growing threat of IEDs in America," Fox News, April 2013.

"ISIS and Religious Justification," CNN, September 2014.

"Who's Worse? ISIS or al-Qaeda," CNN, September 2014.

"State Department Uses Islamic State Propaganda to Fight Militants," Voice of America, September 2014.

"A Deadly Shooting in Tennessee and the Threat of Domestic Terrorism," Diane Rehm Show (NPR), July 2015.

"Shootings at a Planned Parenthood Clinic in Colorado," Diane Rehm Show (NPR), December 2015.

"ISIS Propaganda department creates new app targeting kids," Sinclair Broadcast Group, May 2016.

"Orlando rampage reflects the scary convergence between terrorism and mass shootings," The Washington Post, June 2016.

Interview with Deborah Feyerick, Erin Burnett OutFront (CNN), July 2016.

Interview with Bill O'Reilly, The O'Reilly Factor (Fox News), July 2016.

Interview with KCTV News, (CBS), July 2016.

"Online Terrorist Propaganda Still a Challenge for Tech Companies," The Wall Street Journal, June 2017.

"How Different and Dangerous is Terrorism Today," New Yorker, June 2017.

"Does Charlottesville Horror Make the Case for a U.S. Domestic Counterterrorism Law?," McClatchy News, September 2017

"The Ignominious End of the ISIS Caliphate," New Yorker, October 2017.

Selected Training Experience

Understanding al-Qa'ida," A Tale of Two Caliphates," Joint Special Operations University, Interagency Collaboration Course and the Combating Terrorist Networks Course, MacDill Air Force Base, various dates, 2009-2016.

"The Strategy of Terrorism," "Evolution of the Global Jihadist Threat," "Radicalization," "Terrorist Use of the Internet," "Understanding Islam," "Islam, Islamism and Violent Jihadism," "Terrorism in East Africa," "Terrorism in Yemen," "Terrorism in South Asia," "Terrorism in South East Asia," "Terrorism in North Africa and the Sahel," "Understanding Hamas," "Understanding Hezbollah," "Countering Violent Extremism," Federal Bureau of Investigation, various dates, 2008-2014.

"Islam in the United States: Culture and Customs," United States Attorneys' Office, various dates 2010-2012.

"Environmental Extremists' use of Arson in the United States," National Fusion Center Fire Services Network, November 2013.

"Extremist Violence by the Numbers," local law enforcement, New York U.S. Attorneys' Office, February 2013.

"Terrorism and Extremist Violence in the United States," National Governors' Association, February 2013-2015.

"A Tale of Two Caliphates," U.S. Army Intelligence and Security Command: Commander's Conference, September 2015.

"Radicalization and CVE," Senior Law Enforcement Training Program, Anti-Defamation League, various dates, 2015-2016.

"Understanding CVE," Foreign Service Institute, Department of State, various dates 2015-2016.

"An Empirical Approach to Evaluating Counterterrorism Effectiveness," International Intelligence Fellows Program, Defense Intelligence Agency, various dates, 2015-2016.

"Conceptual Frameworks for Understanding Global Jihadism," "A Tale of Two Caliphates," "Radicalization and CVE," "Lone Actors and Foreign Fighters," and "Suicide Terrorism," Transportation Security Administration Lecture Series, various dates, 2016.

"Executive Forum on Counterterrorism", "Executive Forum on Foreign Terrorism Fighters", "Executive Forum on Countering IED's," on behalf of the Diplomatic Security Service Anti-Terrorism Assistance Program, with delegations from Algeria, Cameroon, India, Kyrgyzstan, Malaysia, and Morocco, various dates 2015-2018.

Awards and Service

Department of the Army Superior Civilian Service Award: Presented by the Superintendent of the United States Military Academy. This is the third highest award possible for Department of the Army employees.

Selected to facilitate the first and second *National Summit on Empowering Communities to Prevent Violent Extremism* by the Department of Justice and the Federal Emergency Management Agency, 2014 and 2015.

Selected to serve as the Rapporteur to the United Nations Security Council at the UN Counterterrorism Executive Directorate Research Network launch event, February 2015.

Member of the Editorial Board of the International Centre for Counter-Terrorism-The Hague (ICCT).