C+W # 15-035

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America
v.
KEONNA THOMAS,
a/k/a "Fatayat Al Khilafah,"
a/k/a "YoungLioness"

Case No. 15-417-M

Defendant(s)

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 August 2013 - March 2015 in the county of Philadelphia in the Eastern District of Pennsylvania, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. 2339B	From in or about August 2013, through in or about March 2015, in the Eastern District of Pennsylvania, the defendant, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," knowingly attempted to provide material support and resources, as defined by 18 U.S.C. Section 2339A(b), including personnel, including THOMAS herself, to a designated foreign terrorist organization, to wit: the Islamic State of Iraq and the Levant (ISIL), which was designated on May 15, 2014 by the United States Secretary of State 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, knowing that the organization was a designated terrorist organization, that the organization had engaged in and was engaging in terrorist activity and terrorism, and the defendant is a United States national. All in violation of Section 2339B of Title 18 of the United States Code.

This criminal complaint is based on these facts:

See attached Affidavit

☐ Continued on the attached sheet.

Complainant's signature

Martin McDonald, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 4/3/2015

Judge's signature

City and state: Philadelphia, PA

Honorable Lynne A. Sitarski, U.S. Magistrate

Printed name and title

AFFIDAVIT

I, MARTIN MCDONALD, being duly sworn, depose and say:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") within the meaning of Title 18, United States Code, Section 3052, and as such I am an officer of the United States who is authorized to investigate laws of the United States and to execute warrants issued under the authority of the United States. I have been employed as an FBI Special Agent since November 2010.

2. I am investigating the activities of KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," who is a United States citizen residing in Philadelphia, PA. As will be shown below, I submit there is probable cause to believe that THOMAS has committed the crime of attempting to provide material support or resources to the Islamic State of Iraq and the Levant (ISIL), a designated foreign terrorist organization, in violation of 18 U.S.C. § 2339B.

3. The information contained in this affidavit is based upon my personal knowledge of this investigation as well as information that I obtained from my conversations with other FBI agents, law enforcement officers, and civilian witnesses. Because this affidavit is being submitted for the limited purpose of enabling this Court to make a judicial determination of probable cause to issue an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish the legal basis for the issuance of an arrest warrant.

A. The Islamic State of Iraq and the Levant (ISIL)

4. On October 15, 2004, the United States Secretary of State designated al-Qa'ida in Iraq (AQI), then known as Jam'at al 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.

5. On May 15, 2014, the Secretary of State amended its AQI designations to add the alias "Islamic State of Iraq and the Levant" (ISIL) as its primary name. The Secretary also added additional aliases to the listing, including "the Islamic State of Iraq and al-Sham," and "the Islamic State of Iraq and Syria" (ISIS).

6. As a consequence of these Department of State designations, there is a prohibition against knowingly providing, or attempting or conspiring to provide, material support or resources to, or engaging in transactions with ISIL.

7. On or about August 19, 2014, ISIL claimed responsibility for the videotaped beheading of an American aid worker. On or about September 9, 2014, ISIL claimed responsibility for

the videotaped beheading of another American aid worker. On or about September 13, 2014, ISIL claimed responsibility for the videotaped beheading of a British aid worker. On or about October 3, 2014, ISIL claimed responsibility for the videotaped beheading of another British aid worker. On or about February 3, 2015, ISIL released a video of a captured Jordanian Air Force Pilot being burned alive in a cage. On or about February 15, 2015, ISIL released a video of the beheading of 21 Coptic Christians in Libya. On or about February 24, 2015, ISIL kidnapped approximately 70-100 Assyrian Christians located in Northeast Syria, including men, women, and children.

B. Attempt by KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," to Provide Material Support to ISIL

8. As set forth below, there is probable cause to believe that KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," attempted to travel overseas in order to join, fight with, and martyr herself on behalf of ISIL.

9. On or about August 18, 2013, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," re-posted on Twitter a photograph of a young male child wearing firearm magazine pouches and camouflage attire, with the following caption: "Ask yourselves, while this young man is holding magazines for the Islamic state, what are you doing for it? #ISIS."

10. On or about October 16, 2013, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," posted on Twitter a picture of U.S. Currency, with the following captions; "US Dollar notes donated by Kuwait nationals to the ISIS brothers;" and "Allahu Akbar [God is great]!! Support the Muslims by giving sadaqah [charity]."

11. On or about December 12, 2013, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," sent an electronic communication to a known Somalia-based violent jihadi fighter originally from Minnesota (Co-Conspirator (CC) #1), who identified himself in his electronic communications as a "mujahid [violent jihadi fighter]." In this message, THOMAS stated that she should be "able to travel I should be getting some money soon."

12. On or about December 13, 2013, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," sent an electronic communication to CC#1 advising that she "plan[ned] to leave the land of kufr [non-believers]," but cautioning that "[s]peaking here [online] about certain things is not . . . wise."

13. On or about December 17, 2013, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," sent an electronic communication to CC#1 advising, "I have moves to make so I will be spending less time on here . . . ."

14. On or about December 17, 2013, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a

"YoungLioness," re-posted on Twitter the following statement by another Twitter user; "'Happiness is the day of my martyrdom' – Sheikh Khalid al Husainan."

15. On or about December 23, 2013, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," re-posted on Twitter a video along with text advising that the video constitutes "a message to #muslims in the west from a British brother with #ISIS #Mujahideen [violent jihadi fighter] #Syria." The video is titled, "A message from a mujahid," and is accompanied by the following description: "ISIS mujahid gives some advice. Rayat al Tawheed. Official Media of the mujahideen."

16. On or about January 1, 2014, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," posted on Twitter the following statement: "I see why the mujahideen [violent jihadi fighters] Sacrifice Dunya [life on earth] for Akhirah [the afterlife] there's no comparison."

17. On or about January 4, 2014, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," posted on Twitter the following statement: "Only thing I'm jealous of is when I see the smiles of shuhadaa [martyrs]."

18. On or about January 15, 2014, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," posted on Twitter the following statement: "I want these to be my last words." Accompanying this statement was a photograph of the following text: "By the Lord of the Kaaba [a shrine in Mecca] I have succeeded."

19. On or about January 30, 2014, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," re-posted on Twitter a photograph of an individual carrying an AK-47 weapon, with the following text: "Sponsor a Mujahid [violent jihadi fighter]." Accompanying the photograph, THOMAS re-posted the following statement by another Twitter user; "Did you know… For as little as $100 you can provide a #Mujahid with his basic necessities for 1 month?"

20. On or about April 10, 2014, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," posted on Twitter the following statement, followed by images of a skull, flames, and a gun: "I need a permanent vacation that can only mean one thing." In response, another user of Twitter posted the following statement: "istishhaadi [martyrdom]."

21. On or about April 27, 2014, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," posted on Twitter the following statement: "I would prefer the shahada [martyrdom] of being in the bodies of green birds." Based on my experience and expertise, this is a reference to the belief that the souls of martyrs are held in the hearts of green birds.

22. On or about June 23, 2014, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a

"YoungLioness," posted on Twitter the following statement: "When you're a mujahid [violent jihadi fighter] your death becomes a wedding. #HoorAlAyn [pleasures in paradise]."

23. On or about October 10, 2014, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," posted on Twitter the following statement: "May Allah Ta Ala [God] give victory to the Muj [violent jihadi fighters] & destroy the kuffar & munabfiqeen [infidels & hypocrites] Ameen."

24. On or about December 2, 2014, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," posted on Twitter the following statement: "If we truly knew the realities . . . we all would be rushing to join our brothers in the front lines pray ALLAH accept us as shuhada [martyrs]."

25. On or about December 2, 2014, a known overseas ISIL fighter (CC#2) sent an electronic communication to KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," stating "i arrived and now going through training. Follow on this account until I get my phone." THOMAS responded with the electronic communication, "I'm so happy for u." CC#2 responded, "You have no idea the blessing is it is to be in Raqqa [a city in Syria]," to which THOMAS responded, "alhumduillah Rabil Alameen [Thanks be to God]."

26. On or about December 2, 2014, CC#2 sent an electronic communication to KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," stating, "children of the syrians is the future generation mujahidin [violent jihadi fighters]. Walaah They love Dawla [ISIL]."

27. On or about December 2, 2014, CC#2 sent an electronic communication to KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," stating, "trust me u haven't seens anything yet. U need to be here to see it."

28. On or about December 6, 2014, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," re-posted on Twitter a photograph of a small male child with an AK-47 assault rifle around his neck, containing the following statement: "And if I were in Shaam [greater Syria], I wouldn't be pleased till I became soldier of the Islamic State."

29. On or about January 30, 2015, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," sent an electronic communication to a radical Islamic cleric located in Jamaica (CC#3) stating, "i don't want to say much here . . . . as of now im still here in the states but will be leaving soon."

30. On or about February 4, 2015, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," submitted an application for a United States Passport.

31. On or about February 14, 2015, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," sent an electronic communication to CC#3 stating, "deactivated my twitter till i leave for sham [greater Syria]. . . . don't want to draw attention of the kuffar [non-believers] and it mess my plans and they take my pass port and i get stuck here."

32. On or about February 14, 2015, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," sent an electronic communication to CC#3 advising that she sought help from CC#2 regarding "routes" and her "travel plan."

33. On or about February 17, 2015, CC#2 sent an electronic communication to KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," stating, "Even my wife . . . If she turned out after all these yrs to be a spy I will personally blow her brains all over the bedroom . . . Even to u if I married U and u betrayed me . . . . But if my wife comes and it turns out she was a spy after all these yrs . . . I will personally behead her." In response, THOMAS stated, "cutting head is more personal."

34. On or about February 17, 2015, CC#2 sent an electronic communication to KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," stating, "U probably want to do Istishadee [martyrdom operations] with me." In response, THOMAS stated, "that would be amazing. . . . a girl can only wish." CC#2 then responded, "I can make that wish come true."

35. In February and March 2015, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," conducted online research into various indirect travel routes to Turkey.

36. On or about March 23, 2015, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," purchased an electronic visa, in her own name, for travel to Turkey.

37. Turkey is known to be the most common and most direct transit point for individuals traveling from locations in Europe who are seeking to enter Syria and join ISIL. In addition, an ISIL manual published in early 2015 recommends that ISIL recruits travel to Turkey in order to slip over the border into neighboring Syria. This manual further advises such ISIL travelers to purchase round-trip tickets to popular vacation spots, specifically suggesting Spain, and to purchase tickets to the final destination once overseas.

38. On or about March 25, 2015, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," conducted online research into "buses from Barcelona to Istanbul."

39. On or about March 26, 2015, KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," purchased airline tickets to fly on March 29, 2015 (three days later), from Philadelphia International Airport, to Barcelona, Spain, returning to the United States on April 15, 2015.

Based on the above facts, your affiant asserts that there is probable cause to believe that KEONNA THOMAS, a/k/a "Fatayat Al Khilafah," a/k/a "YoungLioness," knowingly attempted to provide material support and resources, as defined by 18 U.S.C. Section 2339A(b), including personnel, including THOMAS herself, to a designated foreign terrorist organization, to wit: ISIL, in violation of Title 18, United States Code Section 2339B, and that a warrant should be issued for her arrest.

MARTIN McDONALD
Special Agent
Federal Bureau of Investigation

Sworn before me this
7th day of April, 2015

HONORABLE LYNNE A. SITARSKI
United States Magistrate Judge