

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"

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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
18 U.S.C. 2339B

Offense Description

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. Sitarsh, U.S. Magistrate

Printed name and title