

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Criminal Case No. 1:14-mj-01045-KLM

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. SHANNON MAUREEN CONLEY,

Defendant.

INFORMATION

Count 1

**(18 U.S.C. § 371 – Conspiracy to Provide Material Support to a Designated Foreign
Terrorist Organization)**

The United States Attorney charges that:

A. The Conspiracy

1. From on or about sometime in September 2013, and continuing through on or about April 8, 2014, the exact dates being unknown, in the State and District of Colorado and elsewhere, Defendant Shannon Maureen Conley and co-conspirator Y.M. did unlawfully, voluntarily, intentionally, knowingly and willfully conspire, combine, confederate, and agree together with each other and other individuals both known and unknown to commit an offense against the United States, specifically to provide and attempt to provide

material support and resources to a designated foreign terrorist organization, specifically Al-Qaeda (“AQ”) and its affiliates, including Al-Qaeda in Iraq (“AQI”), a/k/a the Islamic State of Iraq (“ISI”), a/k/a the Islamic State of Iraq and Al Sham (“ISIS”), a/k/a the Islamic State of Iraq and the Levant (“ISIL”), continuously designated since December 17, 2004, all in violation of Title 18, United States Code, Section 2339B.

B. Manner and Means of the Conspiracy

2. The conspiracy was accomplished, in part, through the following manner and means:
3. Sometime in 2013, Defendant Shannon Maureen Conley met Y.M. on the internet. During their communications, Conley and Y.M. shared their view of Islam as requiring participation in violent jihad against any non-believers. Y.M. communicated to Conley that he was an active member of an Al-Qaeda (“AQ”) affiliate fighting in Syria known as the Islamic State of Iraq and Al Sham (“ISIS”), a/k/a Al-Qaeda in Iraq (“AQI”), a/k/a the Islamic State of Iraq (ISI), a/k/a the Islamic State of Iraq and the Levant (“ISIL”). Conley and Y.M. decided to become engaged; and, together with each other and others both known and unknown, arranged to have Conley travel to Syria and be with Y.M..
4. Before traveling to Syria, Conley was to refine and obtain additional training and skills in order to provide support and assistance to any AQ and/or ISIS fighter. Conley and Y.M. planned for Conley to provide support and assistance and to fight should it be deemed necessary.

C. Overt Acts of the Conspiracy

5. In furtherance of the conspiracy, Defendant Conley and co-conspirator Y.M. acted interdependently and committed one or more overt acts, including but not limited to the following:

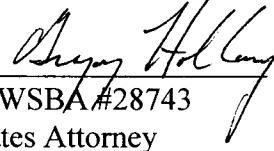
6. On or about September 7, 2013, Defendant Conley joined the US Army Explorers (“USAE”) to be trained in US military tactics and in firearms.
7. Between and on or about February 7, 2014 through February 9, 2014, Defendant Conley traveled to Texas and attended the USAE training.
8. On or about March 29, 2014, Y.M., together with others, arranged for an airline ticket to be purchased for Defendant Conley to travel to Turkey, departing from Denver on April 8, 2014.
9. On or about April 8, 2014, Defendant Conley went to Denver International Airport (DIA) to fly to Turkey.

All in violation of Title 18, United States Code, Section 371.

Respectfully submitted this 22nd day of April, 2014.

Respectfully submitted,

JOHN F. WALSH
UNITED STATES ATTORNEY

s/Gregory Holloway 
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Attorney for Government

DEFENDANT: SHANNON MAUREEN CONLEY

YOB: 1996

ADDRESS (CITY/STATE): Arvada, Colorado

OFFENSE(S): 18 U.S.C. § 371, Conspiracy to Provide Material Support to a Designated Foreign Terrorist Organization

LOCATION OF OFFENSE (COUNTY/STATE): Jefferson County, Colorado

PENALTY: NMT 5 years imprisonment, \$250,000 fine, or both; NMT 3 years supervised release; \$100 special assessment

AGENT: Christian K. R. Byrne
Task Force Officer, FBI-JTTF

AUTHORIZED BY: Gregory Holloway
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

X five days or less _____ over five days _____ other

THE GOVERNMENT

X will seek detention in this case _____ will **not** seek detention in this case

The statutory presumption of detention **is** applicable to this defendant.

OCDETF CASE: _____ Yes X No