

THE GRAND JURY FURTHER CHARGES:

COUNT 2

**18 U.S.C § 2339B
(Aiding and Abetting Individual A and Individual B
In Providing Material Support to ISIS)**

From on or about March 23, 2015 to on or about April 7, 2015, the exact dates being unknown to the Grand Jury, the defendant,

SAMANTHA ELHASSANI,

a national of the United States, did knowingly provide material support and resources, as that term is defined in Title 18, United States Code, §2339A(b)(1), that is, aiding and abetting Individual A and Individual B in providing themselves as personnel to ISIS, including by procuring tactical gear and funds for their use in fighting for ISIS, which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization, knowing that the organization was a designated terrorist organization, and knowing that the organization had engaged in, and was engaging in, terrorist activity and terrorism, all in violation of Title 18, United States Code §2339B(a)(1).

The conduct alleged in Count 2 occurred outside the jurisdiction of any particular State or district. Prior to the conduct alleged in Count 2, the

