

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
)	Case 1:14-mj-00487
v.)	Assigned To Magistrate Judge Alan Kay
)	Assign Date 08/01/2014
DANIELA GREENE)	Description Crminal Complaint and Arrest
)	
Defendant.)	

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Kevin M. Gallagher, after being duly sworn, depose and state as follows:

I. INTRODUCTION

I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), and have been so employed since August 2009. I am currently assigned to the Washington Field Office. I have training in the preparation, presentation, and service of criminal complaints and arrest and search warrants, and have been involved in the investigation of numerous types of offenses against the United States, including crimes of terrorism, as set forth in 18 U.S.C § 2331, *et seq.* Prior to my current employment, I was an independent contractor for approximately three years, working as an intelligence analyst for two other government agencies within the intelligence community. My knowledge of the facts and circumstances contained within this affidavit is based upon my personal investigation as well as reports made to me by other law enforcement agents. This affidavit does not contain all of the information known to me concerning this investigation. I have included in this affidavit facts that I believe are sufficient to support a probable cause finding for the issuance of the requested criminal complaint and arrest

warrant, but I do not purport to include each and every matter of fact observed or known to me or other law enforcement agents involved in this investigation.

2. This affidavit is being filed in support of a criminal complaint charging Daniela GREENE with making false statements to the FBI, 18 U.S.C. § 1001.

II. STATUTORY OFFENSES

3. Statements or entries generally (18 U.S.C. § 1001)

(a) Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully—

(1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact;

(2) makes any materially false, fictitious, or fraudulent statement or representation; or

(3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry;

shall be fined under this title, imprisoned not more than 5 years or, if the offense involves international or domestic terrorism (as defined in section 2331), imprisoned not more than 8 years, or both. If the matter relates to an offense under chapter 109A, 109B, 110, or 117, or section 1591, then the term of imprisonment imposed under this section shall be not more than 8 years.

III. SUMMARY OF INVESTIGATION

A. Introduction

4. The FBI's investigation of DANIELA GREENE (herein referred to as GREENE) began in late June, 2014.

5. On or before February 03, 2011, GREENE, who speaks and writes fluent German, was hired by the FBI as a Contract Linguist and granted a Top Secret security clearance.

6. In or around January 2014, GREENE began working with the Detroit Division of the FBI in an investigative capacity. Some of her duties involved support of an investigation against a German national, located in Syria, hereinafter referred to as "INDIVIDUAL 'A'." INDIVIDUAL "A" is a leader of an al-Qaeda-inspired Salafist terrorist organization that is banned [REDACTED] due to the participation of its members in violent protests. INDIVIDUAL "A" is currently located in Syria where he is a member of the Islamic State of Iraq and Syria (hereinafter referred to as "ISIS"). ISIS is a dangerous terrorist organization, currently attempting to establish a caliphate in Syria and other portions of the Middle East through the violent overthrow of established governments. ISIS is designated by the U.S. State Department as a Foreign Terrorist Organization.

7. During the period of GREENE's work in support of the investigation into INDIVIDUAL "A", INDIVIDUAL "A" announced his sworn allegiance to ISIS, and called on Muslim fighters from all over the world to come to Syria to support the group in articles and videos published on Twitter and other online sources. At all relevant times,

GREENE was aware that INDIVIDUAL "A" was a member of ISIS and that ISIS was designated by the U.S. State Department as a Foreign Terrorist Organization.

8. On or about June 11, 2014 GREENE told her FBI supervisor and the Chief Security Officer ("CSO") at the [REDACTED] Division of the FBI that she intended to travel to [REDACTED] Germany to see her family on June 21, 2014. Prior to her travel, GREENE was required to submit an FD-772, Report of Foreign Travel form, a requirement for all FBI employees and contractors who hold National Security clearances. The purpose of the form is to identify and minimize the potential risks of unofficial foreign travel, both to FBI personnel and to national security and sensitive information.

9. GREENE submitted and electronically signed an FD-772, Report of Foreign Travel form on or about June 11, 2014. On the FD-772, GREENE reported her intention to travel to [REDACTED] Germany on June 21, 2014. GREENE listed her travel as "Vacation/Personal" and described the reason for her late submission of the form as: "Want to see my family [REDACTED]". GREENE listed her parents as her destination contacts and her scheduled return date as July 4, 2014.

10. On or about June 18, 2014, GREENE's FD-772 was approved by a security officer in the [REDACTED] Division. An original copy of the FD-772 was then printed out sent to Records Management Division (RMD) at the J Edgar Hoover Building (FBI Headquarters) located within the District of Columbia.

11. As revealed below, Greene's statements on the FD-772 that she intended to travel to Germany were false. Subsequent investigation indicates that GREENE did not intend, either at that time or subsequently, to travel to [REDACTED] or to visit her parents.

Instead, her intent at that time was to travel to Turkey, and subsequently to Syria, to meet up with INDIVIDUAL "A". She did, in fact, leave for Turkey on June 23, 2014.

12. On or about June 9, 2014, three days before GREENE submitted her falsified Report of Foreign Travel, a debit card issued to GREENE was used to purchase tickets in GREENE's name for round trip travel from [REDACTED] to Gaziantep, a city in Turkey located fewer than 20 miles from the Syrian border. GREENE was scheduled to fly from [REDACTED] through Chicago on June 13, 2014 and arrive in Gaziantep, Turkey the following day. GREENE's return trip was scheduled to depart from Turkey approximately 26 hours after her arrival. No part of GREENE's ticketed travel was through or in Germany.

13. On or about June 13, 2014 - the day she had been scheduled to depart and two days after submitting her 772 form - the same debit card issued to GREENE was used to purchase tickets in GREENE's name for one-way travel on June 23, 2014 from [REDACTED] to Istanbul, Turkey, with a stop-over in Toronto through Air Canada flight [REDACTED]. No return tickets were purchased and no tickets to or from [REDACTED] or any other German city were purchased. No part of GREENE's ticketed travel was through or in Germany.

14. On or about June 17, 2014, the same debit card issued to GREENE was used to make reservations to stay at the Erguvan Hotel in Istanbul, Turkey.

15. Flight manifests for Air Canada Flight [REDACTED] on June 23, 2014, confirm GREENE was in fact on board this flight. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

16. [REDACTED] In July 2014, GREENE wrote several [REDACTED], which revealed her knowledge that she had committed a criminal act. On July 8, 2014, she sent the following in an email [REDACTED]:

"I am having trouble with my phone and responding to your messages"
... "I was weak and didnt know how to handle anything anymore
I really made a mess of things this time"

On or about July 09, 2014, GREENE wrote another e-mail [REDACTED]:

"... I am gone and I can't come back. I am in Syria. Sometimes I wish I could just come back. I wouldn't even know how to make it through, if I tried to come back. I am in a very harsh environment and I don't know how long I will last here, but it doesn't matter, it's all a little too late..."

On or about July 22, 2014, GREENE wrote an e-mail [REDACTED]:

"Not sure if they told you that I will probably go to prison for a long time if I come back, but that is life. I wish I could turn back time some days. . . . God willing I can arrange things, but better to write my mother in my mother tongue only, few people can read that."

17. Further investigation establishes that Greene went to Syria to meet up with INDIVIDUAL "A". Through the course of her work with the Detroit Division, GREENE identified and reported to an FBI agent several online accounts and phone numbers utilized by INDIVIDUAL "A". Among the accounts GREENE identified as being utilized by INDIVIDUAL "A" were two Skype accounts. Additionally, over the course of her work with the Detroit Division of the FBI, GREENE maintained sole access to a third

Skype account; no other FBI employee or contractor maintained the ability to login. An examination of the associated Internet Protocol (IP) addresses, which are reusable but unique identifiers associated with on-line accounts, indicates that, on multiple occasions in July, 2014, the Skype accounts used by INDIVIDUAL "A" and the Skype account used by GREENE were each assigned the same IP address. As a result, the FBI believes the users of these three accounts were in the same location on multiple instances after June 23, 2014 but before July 10, 2014.

18. According to open source searches, the IP address to which each of the Skype accounts was traced resolves to a satellite internet provider that I know from my experience is a service used repeatedly by other accounts associated with ISIS.

19. Your affiant submits that there is probable cause to believe that beginning on or about June 11, 2014, Daniela GREENE made false statements and representations to the FBI through her FD-772 form regarding her intended itinerary for travel. These misstatements were material to a matter within the jurisdiction of the FBI because they masked her intent to travel to Syria to meet INDIVIDUAL "A", an ISIS member, which travel as an FBI employee, had it been revealed to the FBI, would have resulted in a prohibition on such travel and possibly additional administrative actions against GREENE.

VI. CONCLUSION

Based on the foregoing evidence and information described in this affidavit, I submit there is probable cause to believe that between on or about June 11, 2014 and on or about June 18, 2014, in the District of Columbia and elsewhere,

DANIELA GREENE did make false statements to the FBI in violation of 18 U.S.C §1001.



Kevin M. Gallagher
Special Agent
Federal Bureau of Investigation

AUG 01 2014

Sworn to and subscribed before me

this _____ day of _____, 2014.



United States Magistrate Judge

ALAN KAY
U.S. MAGISTRATE JUDGE