#### Norfolk Division

EASTERN DISTRICT OF VIRGINIA

UNITED STATES OF AMERICA	)	
v.	)	Criminal No. 2:17cr 1
LIONEL NELSON WILLIAMS,	)	18 U.S.C. § 2339B
a/k/a "Harun Ash-Shababi,"	)	Attempt to Provide Material Support or
ŕ	)	Resources to a Designated Foreign Terrorist
Defendant.	)	Organization
	)	(Count 1)

### **INDICTMENT**

January 2017 Term—At Norfolk

THE GRAND JURY CHARGES THAT:

### COUNT 1

# ATTEMPT TO PROVIDE MATERIAL SUPPORT OR RESOURCES (18 U.S.C. § 2339B)

- 1. On October 15, 2004, the United States Secretary of State designated al-Qa'ida in Iraq, then known as Jam'at al Tawhid wa'al-Jihad, as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act, and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224.
- 2. On May 15, 2014, the Secretary of State amended the designation of al-Qa'ida in Iraq as a FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant ("ISIL") as its primary name. The Secretary also added the following aliases to the ISIL listing: the Islamic State of Iraq and al-Sham, the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-

Furqan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the ISIL listing: Islamic State, ISIL, and ISIS. To date, ISIL remains a designated FTO.

- 3. Between on or about March 2016 and on or about December 22, 2016, in the City of Suffolk, in the Eastern District of Virginia, and elsewhere, defendant LIONEL NELSON WILLIAMS, a/k/a "Harun Ash-Shababi," did knowingly and unlawfully attempt to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b)(1), including money, property, and services, to a foreign terrorist organization, to wit, the Islamic State of Iraq and the Levant ("ISIL"), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization, knowing that ISIL had been designated as a foreign terrorist organization, and knowing that ISIL had engaged in, and was engaging in, terrorist activity and terrorism.
- 4. As part of his attempt to provide material support to ISIL, among other things, and understanding and believing that ISIL needed funds to support its violent activities, LIONEL NELSON WILLIAMS, a/k/a "Harun Ash-Shababi," provided another person and other persons with a prepaid debit card and a monetary wire transmission, understanding and intending that those funds would be provided to ISIL, and used by ISIL, including to purchase weapons for fighting.

(All in violation of Title 18, United States Code, Section 2339B.)

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Pursernt to the II-Government Act, the original of that page has been releatuated scal in the Clerk's Office.

## <u>United States v. Lionel Nelson Williams, a/k/a "Harun Ash-Shababi"</u> Criminal No. 2:17cr

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FOREPERSON

Dana J. Boente

United States Attorney

By:

Joseph E. IpePadilla Andrew C. Bosse

Assistant United States Attorneys United States Attorney's Office 101 West Main Street, Suite 8000

Norfolk, VA 23510 Telephone: 757-441-6331 Facsimile: 757-441-6689

E-Mail Addresses: Joe.Depadilla@usdoj.gov

Andrew.Bosse@usdoj.gov

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Criminal Case Cover Sheet U.S. District Court

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	of Offense		Under Seal: Yes						Judge Assigned: Criminal Number: 2:17cr				
	Suffolk, 'y/Parish:	VA	<del>                                     </del>	Superseding Indictment:							Lionel Nelson W		
Count	y/Parisn:			Same Defendant: Magistrate Judge Case Number: 2:16mj524									
							1324		Arraignment Date: January 11, 2017 at 9:00 am. Please send notice of				
	Search Warrant Case Nu					эг. 			arraig	nment to co	ment to counsel and defendant.		
Defer	idant Info	ormation:	R 20/R 40 fr	rom D	istrict of _								
			T										
	le: Yes 🗆		FBI#		_	Г							
Defend	lant Name	:: Lionel Ne	elson William	s		Alias Nan	ne(s):	Ha	arun As	sh-Shababi			
Addres				lk, VA		1					<del></del>		
Birth D		1990	SS#:	1424	Sex: M	Sex: M Race: Black Nation			•	: U.S.	Place of Birth:		
Height	t: 5'11"	Weight:	140 lbs.	Н	lair: Blac	k	Eyes:	Bro	own		Scars/Tattoos	3 <b>:</b>	
Interpr	eter: Yes	□ No 🗵	List Langua	age an	d/or diale	et:							
Locat	<u>ion Statu</u>	<u>s:</u>											
Arrest	Date:												
⊠ Alı	☐ Already in Federal Custody as of: 12/22/16in: Western Tidewater Regional Jail									·			
☐ Alı	☐ Already in State Custody				□ On I	☐ On Pretrial Release					☐ Not in Cu	ıstody	
☐ Arrest Warrant Requested				☐ Fugitive					☐ Summons	☐ Summons Requested			
□Arre	☐Arrest Warrant Pending				☐ Dete	☐ Detention Sought				☐ Bond			
Defer	ise Couns	sel Informa	tion:										
Name	: Keith L.	Kimbali			☐ Cour	☐ Court Appointed							
Addre	ss: 150 Bo	ush Street, S	uite 403, Norf	folk,									
VA 23510					☐ Retained								
Telephone: 757-457-0800 ⊠ Public Defender							···						
1				☐ Office of Federal Public Defender should not be appointed due to conflict of interest									
					☐ CJA attorney: should not be appointed due to conflict of interest								
U.S.	Attorney	Informatio	<u>n:</u>		•								
AUS	As: Joseph	E. DePadill	a, Andrew C.	Bosse	Teleph	one No. 7	57-441	-633	31	Bar	#:		
Comp	lainant A	gency, Add	dress & Pho	ne Nı	ımber or	Person &	Title	:					
FBI, 5	09 Resou	rce Row, C	hesapeake, V	/A 23	3320, 757	-455-0100	), Spec	ial	Agent	K. Ashby			
<u> </u>	. Citation	<del>-</del>										······································	
	C	ode/Section		Des	cription o	of Offense	Charge	ed		Count(s)	Capital/Feld	ony/Misd/Petty	
Set I		C. § 2339B	Res	empt t	o Provide Material Support or s to a Designated Foreign Terro			or	rist	1	Felony		
Set 2									İ				
Set 3													

Set 4