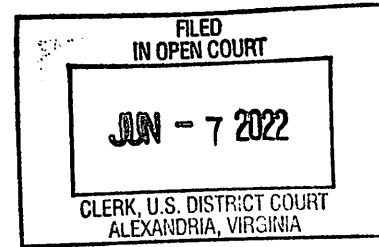


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

ALLISON FLUKE-EKREN,
a/k/a "Allison Ekren,"
a/k/a "Umm Mohammed al-Amriki,"
a/k/a "Umm Mohammed,"

Defendant.

Case No. 1:22-cr-92

STATEMENT OF FACTS

The United States and the defendant, ALLISON FLUKE-EKREN, a/k/a, "Allison Ekren," a/k/a "Umm Mohammed al-Amriki," and a/k/a "Umm Mohammed" (hereinafter, "FLUKE-EKREN" or "the defendant"), agree that at trial, the United States would have proven the following beyond a reasonable doubt with admissible and credible evidence:

Fluke-Ekren's Departure from the United States

1. FLUKE-EKREN is a 42-year-old former resident of Kansas who provided and conspired to provide material support and resources to the Islamic State of Iraq and al-Sham ("ISIS"), including, but not limited to, serving as the leader of an all-female ISIS military battalion and training numerous women and children on the use of automatic firing AK-47 assault rifles, grenades, and suicide belts on behalf of the terrorist organization.

2. FLUKE-EKREN was born in the United States. She studied biology at the University of Kansas and attended a teaching program at Earlham College in Indiana. FLUKE-EKREN speaks and understands English and Arabic fluently. She also speaks some Turkish and Spanish. FLUKE-EKREN departed the United States with her second husband in or around

2008 and moved to Egypt. FLUKE-EKREN resided in Egypt until in or around 2011 (including periodic visits to the United States between 2008–2011), at which point she moved to Libya. FLUKE-EKREN was outside the United States since on or about January 8, 2011, until she was transferred in custody to the Eastern District of Virginia on January 28, 2022.

Fluke-Ekren's Involvement in the Aftermath of the Benghazi Terrorist Attack

3. Near the end of 2011, FLUKE-EKREN resided with her second husband (a now-deceased former member of the terrorist organization Ansar al-Sharia), among others, in Benghazi, Libya. In the aftermath of the September 11, 2012 terrorist attack on the U.S. Special Mission and CIA Annex in Benghazi, during which four Americans were killed, FLUKE-EKREN's second husband claimed that he removed at least one box of documents and at least one electronic device from the U.S. compound in Benghazi. He brought them to the residence where he resided with FLUKE-EKREN and others at that time. FLUKE-EKREN assisted her second husband with reviewing and summarizing the contents of the stolen U.S. government documents. The stolen documents and electronic device, along with the summaries that FLUKE-EKREN helped prepare, were ultimately provided to the leadership of Ansar al-Sharia in Benghazi.

4. In or around late 2012, FLUKE-EKREN, her second husband, and others traveled from Libya to Turkey. According to a witness with first-hand knowledge of the move, FLUKE-EKREN and her second husband left Libya because at the time they believed Ansar al-Sharia was no longer conducting attacks there, and they wished to engage in violent *jihad* elsewhere.

Fluke-Ekren's Travel to Syria and Attack Aspirations against the United States

5. In or around late 2012 or early 2013, FLUKE-EKREN, her second husband, and others, traveled from Turkey to Syria. After approximately six weeks, FLUKE-EKREN

returned to Turkey while her second husband remained in Syria. FLUKE-EKREN's second husband ascended through the ranks of ISIS and ultimately became the *emir* (leader) of ISIS snipers in Syria. In or around mid-2014, FLUKE-EKREN and others were smuggled back into Syria.

6. While residing in Syria, FLUKE-EKREN told a witness ("Witness-1") about her desire to conduct an attack in the United States. To conduct the attack, FLUKE-EKREN explained that she could go to a shopping mall in the United States, park a vehicle full of explosives in the basement or parking garage level of the structure, and detonate the explosives in the vehicle with a cell phone triggering device. FLUKE-EKREN told Witness-1 that she also fantasized about conducting other attacks, and that a location was a good target if it contained large amounts of congregating people. FLUKE-EKREN also spoke to Witness-1 about learning how to make bombs and explosives. FLUKE-EKREN further told Witness-1 that she considered any attack that did not kill a large number of individuals to be a waste of resources. FLUKE-EKREN would hear about external attacks taking place in countries outside the United States and would comment to Witness-1 that she wished the attack had occurred on United States soil instead.

7. In 2014, ISIS officials sent a female member of ISIS who traveled from Central America ("Witness-2") to Ablah, Syria, where she resided in an adjoining residence to FLUKE-EKREN for approximately 18 days. Witness-2 observed that FLUKE-EKREN possessed a collection of weapons in her home.

8. Witness-2 visited FLUKE-EKREN at her residence in Syria on multiple occasions. During those visits, FLUKE-EKREN discussed ideas for an attack involving the use of explosives on the campus of a U.S.-based college in the Midwest. FLUKE-EKREN also

stated that she was seeking vengeance, having come up with the plan after a market area was bombed by air strikes near al-Bab, Syria and children had died as a result, for which FLUKE-EKREN believed Americans were responsible.

9. Also in 2014, an individual from the United States (“Witness-3”) was unlawfully smuggled into Syria in order to meet a then-prominent ISIS militant (“ISIS Individual-A”). While in Syria, ISIS Individual-A sent Witness-3 to FLUKE-EKREN’s residence in the town of Tabqa to learn more about ISIS and become more sympathetic to ISIS.

10. Witness-3 visited FLUKE-EKREN’s house on multiple occasions in the summer of 2014. During these visits, FLUKE-EKREN defended ISIS’s ideology and explained to Witness-3 why FLUKE-EKREN did not wish to leave ISIS-controlled territory. Witness-3 observed that weapons, including automatic firing AK-47 assault rifles, were kept in FLUKE-EKREN’s residence. Female members of ISIS were encouraged to have weapons in their home, even when their husbands were not present, in order to defend ISIS-controlled territory against ISIS’s enemies.

Fluke-Ekren Provides Support to ISIS in Iraq

11. In or around 2015, FLUKE-EKREN’s second husband expressed a desire to conduct a suicide attack on behalf of ISIS. ISIS did not allow FLUKE-EKREN’s second husband to carry out a suicide mission because he was the *emir* (leader) of ISIS snipers in Syria, and the terrorist organization wanted him to continue training other snipers. At this time, FLUKE-EKREN, her second husband, and others moved from Syria to Mosul, Iraq, where they temporarily resided inside an ISIS-controlled compound within the University of Mosul.

12. When FLUKE-EKREN arrived in Mosul, she met with ISIS personnel who were in charge of homes for widowed women whose husbands died while fighting for ISIS. FLUKE-

EKREN assisted the ISIS personnel by providing ideas for how the homes should function and operate.

Fluke-Ekren Returns to Syria and Leads an ISIS Battalion

13. FLUKE-EKREN, her second husband, and others moved back to Syria in or about late 2015. In or about February 2016, an air strike killed FLUKE-EKREN's second husband in Tel Abyad, Syria, as he was conducting reconnaissance on a hill and attempting to commit a terrorist attack for ISIS.

14. During the summer of 2016, FLUKE-EKREN married her third husband – a Bangladeshi ISIS member who specialized in drones. This individual built drones for ISIS and was working on two projects prior to his death. The first project involved creating a plan to conduct an attack outside of the Islamic State. The second project involved attaching chemical weapons onto drones to drop chemical bombs from the air. In or about October 2016, an air strike killed FLUKE-EKREN's third husband in Raqqa, Syria.

15. In or around mid-2016, FLUKE-EKREN led and organized an effort to establish a Women's Center in Raqqa, Syria. FLUKE-EKREN informed a witness ("Witness-4"), among others, that she obtained authorization from the "Wali" (the ISIS-appointed mayor) of Raqqa in order to establish the Center. The Center began operations in a Raqqa-based villa in or about October 2016. There, FLUKE-EKREN and others provided medical services, educational services about the Islamic State, child care, and various training to women and young girls. As the Center's leader, FLUKE-EKREN also provided, and assisted other female ISIS members in providing, training to numerous women and young girls on the use of automatic firing AK-47 assault rifles, grenades, and explosive suicide belts, to defend themselves against ISIS's enemies.

16. In or around late 2016, the ISIS "Wali" of Raqqa approved the creation of the

“Khatiba Nusaybah” – a military battalion to be comprised solely of female ISIS members.

The Khatiba Nusaybah began operations on behalf of the terrorist organization in or around February 2017. At or about that same time, FLUKE-EKREN married her fourth husband – a Bangladeshi ISIS military leader who was responsible for ISIS’s defense of Raqqa, Syria. This individual died in or around 2018 while fighting for ISIS.

17. FLUKE-EKREN’s main objective as the leader and organizer of the Khatiba Nusaybah battalion was to teach female ISIS members how to defend themselves against ISIS’s enemies, including helping male fighters defend ISIS-controlled Raqqa. There were multiple training locations throughout Raqqa, and FLUKE-EKREN would go to each location to see how the ISIS training was progressing.

18. One of ISIS’s aspirations for the Khatiba Nusaybah under FLUKE-EKREN’s leadership was to form a section of “Inghimasiyin” and a section of “Istihadi.” Inghimasiyin are fighters who sneak into and infiltrate enemy positions with AK-47s, and detonate grenades and an explosive suicide belt when they run out of ammunition. Istihadi fighters are suicide bombers who use vehicle-borne improvised explosive devices (VBIEDs) on enemy positions. While the establishment of the Inghimasiyin and Istihadi sections never materialized, FLUKE-EKREN still succeeded in training numerous women on the use of automatic firing AK-47s, grenades, and explosive suicide belts on behalf of ISIS.

19. In addition to the above-described military training, witnesses with first-hand knowledge stated that the Khatiba Nusaybah also provided certain members with instruction on physical training (including martial arts), medical training, VBIED driving courses, ISIS religious classes, and how to pack and prep a “go bag” with rifles and other military supplies. Some of this training was directly provided by FLUKE-EKREN, who used the following *kunyas*

(aliases) in Syria to protect her true identity: Umm Mohammed al-Amriki and Umm Mohammed.

20. FLUKE-EKREN welcomed any women who wished to join the Khatiba Nusaybah and receive military training on behalf of ISIS in Syria. An individual who received three days of ISIS training with the Khatiba Nusaybah in 2017 stated that ISIS mandated women who were staying in Raqqa during the 2017 siege to attend the military-style training offered by the Khatiba Nusaybah.¹ The siege was launched by the Syrian Democratic Forces (SDF) against ISIS with an aim to seize Raqqa, the former de facto capital of ISIS in Syria. The battle began on or about June 6, 2017 and concluded on or about October 17, 2017, at which point the SDF regained control of Raqqa.

21. Over 100 women and young girls (including as young as 10 or 11-years-old) received military training from FLUKE-EKREN in Syria on behalf of ISIS. In doing so, FLUKE-EKREN sought to motivate her trainees, including another witness (“Witness-5”), by explaining how female fighters can ensure the Islamic State is kept alive by “helping ISIS expand and to remain” through the use of weapons, including automatic firing AK-47 assault rifles, grenades, and suicide belts packed with explosives.

Fluke-Ekren’s Capture in Syria

22. FLUKE-EKREN informed another witness in 2018 (“Witness-6”) that she had instructed an individual in Syria to send a message to one of her family members stating that

¹ For example, in the 100th issue of *al-Naba* (a former ISIS newspaper), which was distributed on or about October 5, 2017, ISIS urged women to fight on the battlefield alongside men in order to defend the terrorist organization. In the article, “The Duty of Women in Waging Jihad Against the Enemy,” the author explained that in the context of the war on ISIS, “it is mandatory for the Muslim women to fulfill their duty from all aspects in supporting the *mujahideen* [male fighters] in this battle, by preparing themselves as *mujahidat* [female fighters] in the cause of Allah, and readying to sacrifice themselves to defend the religion of Allah.”

FLUKE-EKREN was dead so that the U.S. government would not attempt to locate her.

FLUKE-EKREN informed this same witness, who had previously received weapons training from FLUKE-EKREN when she was approximately 11 or 12-years-old, that it was important to kill the *kuffar* (disbelievers) and die as martyrs on behalf of ISIS in Syria. FLUKE-EKREN also told Witness-6 that she never wanted to return to the United States and that she wanted to die in Syria as a martyr.

23. FLUKE-EKREN continued her affiliation with ISIS until in or about May 2019, at which point she was smuggled out of ISIS-controlled territory and married her fifth husband. FLUKE-EKREN stated that, after separating from her fifth husband, she went to the local police station near Qabasin, Syria in the summer of 2021 and attempted to turn herself in. FLUKE-EKREN also stated that she informed the local Syrian authorities that she was an American and wanted to leave Syria at that time. FLUKE-EKREN further stated that approximately two weeks later, she was taken into custody at her home and held for approximately seven months, until January 2022, at a prison facility located in or near Jarabulus, Syria.

24. FLUKE-EKREN was transferred into United States custody on January 28, 2022, and brought from overseas to the Eastern District of Virginia later that day. FLUKE-EKREN knew and understood at all times material to the pending criminal Information that she provided and conspired to provide material support and resources to a designated foreign terrorist organization that engages and has engaged in terrorism.

Conclusion

25. This Statement of Facts includes those facts necessary to support the Plea Agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of

all of the facts surrounding the defendant's case.

26. The actions of FLUKE-EKREN, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,



By:

Raj Parekh
First Assistant United States Attorney
John Gibbs
Assistant United States Attorney
Eastern District of Virginia

Defendant's Signature: After consulting with my attorneys and pursuant to the Plea Agreement entered into this day between the United States and me, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Date:

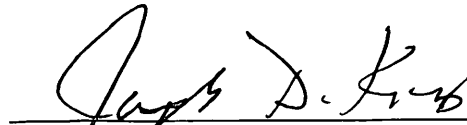
6/6/2022


ALLISON FLUKE-EKREN
Defendant

Defense Counsel Signatures: We, the undersigned, are the defendant's (ALLISON FLUKE-EKREN) attorneys in this case. We have carefully reviewed the above Statement of Facts with her. To our knowledge, her decision to stipulate to these facts is an informed and voluntary one.

Date:

6/6/22


Joseph D. King, Esq.
Sean A. Sherlock, Esq.
Counsel for the Defendant