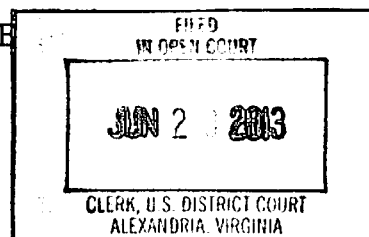


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)	Case No. 1:13cr272 (CMH)
)	
v.)	Count One: 18 U.S.C. § 2339B
)	(Conspiracy to Provide Material Support to a
ERIC HARROUN,)	Foreign Terrorist Organization)
)	
Defendant.)	Count Two: 18 U.S.C. § 2332a(b)
)	(Conspiracy to Use Destructive Devices Overseas)
)	
)	

INDICTMENT

June 2013 Term – At Alexandria

THE GRAND JURY CHARGES THAT:

General Allegations

At all times material to this Indictment:

1. Defendant Eric Harroun is a U.S. citizen. From 2000 to 2003, he was a member of the U.S. Army, where he was trained as a marksman and in combat medicine.
2. On or about January 7, 2013, Harroun crossed the border from Turkey and entered into Syria. While in Syria, Harroun engaged in combat against Syrian forces with a group known as Jabhat al-Nusrah, and others. Harroun understood Jabhat al-Nusrah to be a designated Foreign Terrorist Organization.
3. Jabhat al-Nusrah became designated by the United States as a Foreign Terrorist Organization as follows: On October 8, 2004, the Secretary of State designated Jam'at al Tawhid as a Foreign Terrorist Organization pursuant to Section 219 of the Immigration and Nationality Act. Since that designation, the organization repeatedly changed its name. On December 15,

2004, the Secretary of State amended the designation to include more than a dozen additional names for the same group. The group is commonly referred to as "al Qa'ida in Iraq," including on the State Department's public list of designated foreign terrorist organizations. In November 2012, the Secretary of State again amended the designation to include more recent aliases used by the same terrorist organization, including the al-Nusra Front, Jabhet al-Nusra, and Jabhat al-Nusra.

4. While in Syria, Harroun fought with Jabhat al-Nusra, and others, in various locations, including Ar Raqqa, Idlib and Resafah.

5. While fighting against Syrian forces with Jabhat al-Nusra, Harroun carried and used in combat various firearms, including a sniper rifle, an AK-47 style machine gun, and a rocket-propelled grenade (RPG) weapon.

COUNT ONE

Conspiracy to Provide Material Support to Jabhat al-Nusrah

A. The Grand Jury realleges and incorporates by reference the General Allegations of this Indictment as if set forth in full herein.

B. From in or about January 2013 to in or about February 2013, the exact dates being unknown to the Grand Jury, in Syria and elsewhere outside of the United States, the defendant ERIC HARROUN, a national of the United States, who was first arrested in the Eastern District of Virginia, together with others known and unknown to the Grand Jury, did knowingly conspire to provide material support and resources, as that term is defined in 18 U.S.C. § 2339A(b), that is, personnel, to a foreign terrorist organization, namely al-Qaida in Iraq, also known as Jabhat al-Nusrah, knowing that al-Qaida in Iraq, also known as Jabhat al-Nusrah, was designated a foreign terrorist organization and that the organization had engaged in and was engaging in terrorist activity and in terrorism.

(In violation of Title 18, United States Code, Sections 2339B)

COUNT TWO

Conspiracy to Use Destructive Devices Overseas

A. The Grand Jury realleges and incorporates by reference the General Allegations of this Indictment as if set forth in full herein.

B. From in or about January 2013 to in or about February 2013, the exact dates being unknown to the Grand Jury, in Syria and elsewhere outside of the United States, the defendant ERIC HARROUN, a national of the United States, who was first arrested in the Eastern District of Virginia, together with others known and unknown to the Grand Jury, did knowingly and without lawful authority conspire to use a weapon of mass destruction, that is, a destructive device as defined in 18 U.S.C. § 921, that is, a rocket-propelled grenade and a grenade.

(In violation of Title 18, United States Code, Section 2332a(b))

A TRUE BILL:

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

FOREPERSON

NEIL H. MACBRIDE
United States Attorney



Lynn E. Haaland
Carter H. Burwell
Assistant United States Attorneys