

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
 V.) Cr. No. 09-00017-GAO
)
)
TAREK MEHANNA)

GOVERNMENT'S MOTION FOR DETENTION

The United States Attorney for the District of Massachusetts, through the undersigned Attorneys, moves, pursuant to Title 18, United States Code, Section 3142(f)(1)(A) and (B) and Section 3142(f)(2)(A) and (B) to detain the defendant TAREK MEHANNA pending trial. Pursuant to Title 18, United States Code, Section 3142(e)(3)(B) and (C), there is a rebuttable presumption that "no condition or combination of conditions will reasonably assure the appearance of the [defendant] ... as required and the safety of the community."

Respectfully submitted,
MICHAEL K. LOUCKS
Acting United States Attorney

By: /s/ Jeffrey Auerhahn
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Assistant U.S. Attorneys

Certificate of Service

I do hereby certify that a copy of the foregoing response was served upon the counsel of record for the defendant on this 5th day of November 2009.

 /s/ Jeffrey Auerhahn
Jeffrey Auerhahn
Assistant U.S. Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
V.)	Cr. No. 09-10017-GAO
)	
)	
TAREK MEHANNA)	

GOVERNMENT’S PROFFER AND MEMORANDUM IN SUPPORT OF DETENTION

The United States Attorney hereby respectfully submits this memorandum and written proffer of evidence in support of the argument that the defendant TAREK MEHANNA ("MEHANNA") should be detained pending trial because there are no conditions or combination of conditions that will reasonably assure the appearance of the defendant or the safety of the community.

I. Evidence and submissions

The United States relies on the following submissions, one of which is already part of the record before this Court in Criminal Number 09-10017-GAO and Criminal Number 08-148-LTS:

1. (Unsigned) Affidavit of Special Agent Andrew Nambu, in support of detention in this case, Criminal Number 09-0017-GAO. (A signed copy will be provided to the Court before the detention hearing.)
2. The Affidavit of Special Andrew Nambu, in support of detention, filed in November, 2008, and attachments, in Criminal Number 08-148-LTS.

In addition, the government relies on the following additional documents, photographs, conversations involving the Defendant, as well as other statements of MEHANNA (or statements adopted by

him):

1. Preliminary transcript of conversations between Daniel Maldonado and TAREK MEHANNA on December 12, 2006.
2. On April 23, 2007, MEHANNA gave to CW1 a compact disc with a handwritten label on it, containing data files that included videos depicting violent jihad and violent jihadi training. The contents of said disc have been copied onto a DVD and provide to the Court along with other video files discussed below. (The file is named "jihadi video.")
3. A copy of a poem authored by MEHANNA, using the name Abu Sabaayaa, entitled *Make Martyrdom¹ What You Seek*. (The attached copy was originally posted in April 2008, and was printed from a website on November 2, 2009.)
4. Video files, audio files, images, stored messages, word processed documents, and cached web pages obtained by a forensic analysis of a mirrored copy of MEHANNA's computer hard drive that was obtained on August 10-11, 2006, by the Joint Terrorism Task Force during the execution of a search of MEHANNA's bedroom at his residence in Sudbury, Massachusetts. Excerpts from some of said documents and descriptions of some of the videos are discussed herein. Hard copies of the following stored materials from the hard drive are submitted to the Court for the Court's review:
 - a. printed version of pdf file: *39 Ways to Serve and Participate in Jihad*
 - b. two photographs of MEHANNA at Ground Zero in New York City.²
 - c. DVD containing 2 video files:
 - i. Video concerning the "Expedition of Umar Hadid," file name:ghazwah-omar-hadeed-eng-low.rm[50034].ram_2)
 - ii. Video: File: juthath[75860].rmvb_1.
A video by "The Mujahidin Shura Council in

¹The poem, in the English version, has appeared with either the word *Death* or *Martyrdom* in its title.

²The faces of the other individuals depicted in the photographs have been hidden. They appear without distortion in the original stored photographs.

Iraq" "Information Committee": "Presents the remains of two American soldiers who were kidnapped near al-Yusufiya"

- d. In addition, excerpts of stored conversations between MEHANNA and the following individuals³ on the dates noted (all in 2006) are discussed herein⁴:
- i. Abu Mundhir: January 30, February 2, 4, 5, 16, 21, March 5, 7, 8, 24, 26, 29, April 5, 9
 - ii. AR: February 7, 28, March 13, 27, April 4, 11, June 8, 22, 28
 - iii. AAB: February 6, 7, 14, March 23, April 11, 28, 29, May 9, 10, 14
 - iv. DS: January 31, February 1, 4, 5, 6, 8, 12, 13, April 1, May 28, June 22, July 7, 25, 29
 - v. ABOUSAMRA⁵: February 5, April 1, 6, 12, 26, June 8, 12
 - vi. M: March 30, April 3, 25, May 8, 22, June 9
 - vii. T: July 12
 - viii.A-S: July 14
 - ix. E: May 8, 10, June 8
 - x. UK: February 7
 - xi. T2: March 21, April 9, 26
 - xii. I: May 12
 - xiii.I2: July 13
 - xiv. AZ: February 14, April 3, 7, July 19
 - xv. S: March 6

³The names provided are the initials of their screens names (or some portion thereof) as they appear on the stored communications and not necessarily their true names; in cases where the screen name appears to identify the given name of an individual, the screen name has been modified to protect the identity of an individual who is not currently charged with a crime.

⁴This is not an exhaustive list of the individuals with whom MEHANNA communicated in the manner and concerning the topics described herein.

⁵AHMAD ABOUSAMRA ("ABOUSAMRA") is an uncharged coconspirator in the Complaint issued in Criminal Number 09-0119-LTS, and an indicted codefendant in the instant indictment Criminal Number 09-0017-GAO. It is believed that he fled the United States shortly after being questioned by the F.B.I. in December 2006, concerning inter alia his trip to Yemen with MEHANNA in February 2004 (and his (ABOUSAMRA's) subsequent activity in Iraq).

xvi. Maldonado: June 3
xvii.N: April 15, July 8
viii.T3: February 25, 27, 28
ix. Abu Sayyaf: February 15

II. Statement of the Law

The United States may move to detain a defendant pending trial based on dangerousness and risk of flight if the case against the defendant "involves" "a crime of violence ... or an offense listed in [title 18,] section 2332(g)(5)(B) for which a maximum term of imprisonment of 10 years or more is prescribed" (18 U.S.C. §3142(f)(1)(A)), or "an offense for which the maximum sentence is life imprisonment" (18 U.S.C. §3142(f)(1)(B)).

The defendant TAREK MEHANNA is currently charged in an indictment that alleges inter alia conspiracy to provide material support to terrorists in violation of 18 U.S.C. §2339A, and conspiracy to kill in a foreign country, in violation of 18 U.S.C. §956(a). Section 2339A is both a crime of violence and an offense listed in section 2332(g)(5)(B), and is punishable by up to 15 years' imprisonment. "[A] conspiracy to commit a crime of violence is itself a crime of violence" for purposes of the Bail Reform Act. United States v. Mitchell, 23 F.3d 1, 3 (1st Cir. 1994); United States v. Bishop, 369 F. Supp. 2d 9, 11-12 (D. Maine 2005). Similarly, section 956(a) is both a crime of violence and an offense listed in section 2332(g)(5)(B), and is punishable by more than 10 years' imprisonment. Thus, there are several grounds that support the government moving for detention

pursuant to 18 U.S.C. §3142(f)(1)(A). Finally, a violation of 18 U.S.C. §956(a) is punishable by life imprisonment, which allows the government to move for detention under 18 U.S.C. §3142(f)(1)(B).

Pursuant to 18 U.S.C. §3142(f)(2), the United States may move for detention in any "case that involves -

- (A) a serious risk that [the defendant] ... will flee;
- or
- (B) a serious risk that [the defendant] ... will obstruct or attempt to obstruct justice, or threaten, injure, or intimidate, or attempt to threaten, injure, or intimidate, a prospective witness or juror."

Both grounds are applicable in this case. First, as discussed herein, there is a serious risk that the Defendant MEHANNA will flee (as did his coconspirator ABOUSAMRA). In addition, obstruction of justice is a legitimate concern in light of the allegations in the indictment; the charges in the superceding indictment include a conspiracy to provide false information and documents to law enforcement to conceal their illegal activities. Accordingly, the United States has based its motion on these sections as well.

Finally, because of the nature of the charges against the defendant, the government has the benefit of a presumption on both risk of flight and dangerousness; 18 U.S.C. §3142(e)(3), provides in part as follows:

- (3) Subject to rebuttal by the [defendant] ..., it shall be presumed that no condition or combination of conditions will reasonably assure the appearance of the

[defendant] ... as required and the safety of the community if the judicial officer finds that there is probable cause to believe the [defendant] ... committed

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* * * * *

(B) an offense under section ... 956(a), or 2332b of [title 18];
(C) an offense listed in section 2332b(g)(5)(B) of title 18, United States Code, for which a maximum term of imprisonment of 10 years or more is prescribed.

The presumption has been established in this case because this Court has already found probable cause to believe that the defendant conspired to provide material support to terrorists in violation of 18 U.S.C. §2339A, which is an offense listed in section 2332b(g)(5)(B). See Complaint issued in 09-0119-LTS. The presumption is further established because the grand jury found probable cause to believe that the defendant committed the offense in 09-0119-LTS, as well as a violation of 18 U.S.C. §956, which results in a presumption under both 18 U.S.C. §3142(e)(3)(B) and (C).

Thus, there is a presumption that the defendant should be detained (on both risk of flight and dangerousness), and the burden shifts to the defendant to produce contrary evidence. United States v. O'Brien, 895 F.2d 810, 815 (1st Cir. 1990). Nevertheless, the United States is submitting this detailed proffer, outlining some of the evidence that supports detention.

Even when the Defendant MEHANNA was only charged with making

a false statement in violation of 18 U.S.C. §1001 in Criminal Number 09-10017-GAO and Criminal Number 08-148-LTS, and there was no presumption, it was a close question as to whether he should be detained as a risk of flight.⁶ This Court ordered very restrictive terms of release and required his family to secure his appearance with essentially all their assets. Given the changed circumstances of the new charges and legal impact of this new charges, including the fact that he now faces the potential of life imprisonment, and relying on the presumption (that was not applicable to the false statement charge) it is clear that in connection with the new charges, this Court should order the defendant detained pending trial.

III. Submission of Proffer in lieu of Testimony

This government is submitting this lengthy proffer of evidence, along with the other submissions identified above, in lieu of presenting live testimony in support of detention.

"[T]he government may proceed in a detention hearing by proffer or hearsay." United States v. Cardenas, 784 F.2d 937, 938 (9th Cir. 1986); United States v. Ferranti, 66 F.3d 540, 542 (2d Cir. 1995); see also United States v. Salerno, 481 U.S. 739, 743 (1987) (upholding the Bail Reform Act in case wherein the government made a detailed proffer of evidence in the form of

⁶Given the charge at that time, the government could not move to detain on dangerousness grounds. See, e.g., United States v. Ploof, 851 F.2d 7, 11 (1st Cir. 1988).

intercepted conversations and anticipated trial testimony); United States v. Joost, 1994 WL 667011 (1st Cir. 1994) (unreported) ("A district court has wide discretion in determining the form of evidentiary presentation at a bail hearing, such as whether to proceed by live testimony or by proffer."); United States v. Hussain, 2001 WL 420480 (1st Cir. 2001, at n.2 (unreported) (recognizing "the well-established principle that courts may consider and credit reliable hearsay evidence in making determinations under the Bail Reform Act.")⁷

The Court of Appeals for the First Circuit found support for their holding that detention hearings under the Bail Reform Act would "retain the informality of pre-existing bail hearings," in legislative history. United States v. Acevedo-Ramos, 755 F.2d 203, 207-208 (1st Cir. 1985). "[I]n designing the new statute, [Congress] relied heavily upon a similar statute in effect in the District of Columbia." 755 F.2d at 208. In "enacting that earlier statute, the House Judiciary Committee stated that

as is the present practice under the Bail Reform Act, ... **the use of sworn testimony will be the exception and not the rule ... [B]ail hearings under the Bail Reform Act ... proceed primarily by way of proffers. ... If the court is dissatisfied with the nature of the proffer, it can always, within its discretion, insist on direct testimony.**"

755 F.2d at 208 (*italics* in the original) (emphasis added).

⁷The Court of Appeals for the First Circuit also noted in Hussain that "[i]t is equally well-established that bail hearings are not intended to serve as discovery expeditions." Id.

In this case, in addition to the previously filed affidavit in the false statements case (Criminal Number 08-148-LTS), the government relies on a second affidavit from Special Agent Nambu. But more importantly, the government has described herein conversations involving the Defendant, along with other media and documents, that were saved on his computer and obtained pursuant to the execution of a search warrant. Excerpts of these conversations are set forth below. The form of the evidence is considerably more compelling than simply a description of evidence in the form of a proffer from the attorney for the government⁸; these conversations and other items are the evidence.

IV. Analysis of some of the additional evidence:

It would be error to see the actions of the defendant as only involving inchoate crimes of conspiracy -- or attempt (as evidenced by inter alia his trip to Yemen in 2004). As discussed herein and established by his own actions and words, the Defendant did in fact provide significant material support to al Qa'ida and other terrorist groups.

A. "Material support" by providing translation services and distributing material intended to inspire others to

⁸See e.g. Acevedo-Ramos, 755 F.2d at 206 ("Often the opposing parties simply describe to the judicial officer the nature of their evidence; they do not actually produce it.")

participate in violent jihad⁹

In addition to attempting to personally participate in violent jihad as described in the affidavits of Special Agent Nambu, MEHANNA also sought to provide material support to al Qaeda and other terrorist organizations by translating and distributing videos and text that were intended to inspire others to participate in jihad.

1. 39 Ways to Serve and Participate in Jihad

MEHANNA translated "*39 Ways to Serve and Participate in Jihad*" ("*39 Ways*") and provided the finished product to Tibyan Publications for distribution. Tibyan Publications was a radical jihadi website that published and distributed material that supported and was intended to inspire individuals to participate in violent jihad. The contents of "*39 Ways*" is discussed below.

MEHANNA began work on the translation of "*39 Ways*" sometime in 2005. He finished it in April 2006. A series of stored conversations saved on his hard drive concerned completion of the project, including creating an appropriate cover, saving it as pdf document, and distributing it through Tibyan Publications.

Apparently, MEHANNA had an eager audience waiting for the results of his effort; during a conversation on January 30, 2006,

⁹As discussed below, in connection with the publication that was translated by MEHANNA entitled *39 Ways to Serve and Participate in Jihad*, the terrorists themselves (to include MEHANNA) recognize these activities as important to, and equal to participation in, jihad.

with an individual who uses screen names §AB and Abu Mundhir¹⁰ ("Abu Mundhir") told MEHANNA "some brother pmed¹¹ me asking if the 39 ...¹² will be finished." MEHANNA responded: "yeh ... he pmed me too."

On February 4, MEHANNA and Abu Mundhir again discussed *39 Ways* and their role as al Qa'ida's "media wing:"

MEHANNA: are we gonna put 39 in a PDF eventually? ...
 when its done
Abu Mundhir: yes

Abu Mundhir then bragged that others had recognized their efforts on behalf of al Qa'ida ("aqs"), and that they were already recognized as al Qa'ida's "English Wing": Abu Mundhir: "were [sic: we're] bait alrady [sic: already] aqs [al Qa'ida] english wing ... were [sic: we're] known.

MEHANNA recognized that his efforts advanced the cause of violent jihad and, therefore, his role in the effort should be hidden. As he neared completion of his translation of *39 Ways*,

¹⁰Both MEHANNA and ABOUSAMRA have several screen names they utilize, as do many of their friends who share their jihadi philosophy and whose online conversations are discussed herein. In this proffer, both MEHANNA and ABOUSAMRA will be referred to by their true names, regardless of what screen name they were utilizing.

¹¹A "pm" is a personal message, like an "im" or instant message.

¹²Many of the online "conversations" that are quoted herein were saved on MEHANNA's hard drive in the exact form as they occurred. An instant message or chat is often broken up every few words. The use of "..." signifies a break in the text in the original chat.

on March 5, 2006, MEHANNA raised with Abu Mundhir his (MEHANNA's) concern if it were connected directly to him:

MEHANNA: dude ... I was wondering ... about the 39
Abu Mundhir: yeah
MEHANNA: is there anyone else who can finish it ...
 I'd rather not ... continue ... cause the
 next few ones ... are kinda touchy ... and
 I'd prefer not to do 'em ... or
Abu Mundhir: theres no one dude ... u know that lol¹³
MEHANNA: if I can do 'em ... someone else can post
 them
Abu Mundhir: that can be arragned [sic: arranged]
MEHANNA: just as long as my name isn't associated with
 it
Abu Mundhir: yeah ... just finish it all ... and release
 it under ... a franchise ... ac pdf ... and
 delete that

On March 29, 2006, MEHANNA told Abu Mundhir that "39 ... should be done ... within 2-3 dys" [days] I'm on ... #30 ... have like, 10 pgs left." MEHANNA also asked Abu Mundhir: "is there someone ... who will edit 39 ... to format it ... better ... for the PDF." Abu Mundhir suggested someone named Ibn Umar¹⁴ (who he also referred to as "IU" and "ibn u"). MEHANNA asked: "he does all that stuff?" and Abu Mundhir responded: "yea."

Even though the pdf version of *39 Ways* was not yet ready for general release, on April 4, 2006, MEHANNA sent his version to AR in Microsoft Word version:

¹³"Lol" in chats, text messaging and other shorthand online conversations means "laugh out loud."

¹⁴Ibn Umar was an administrator of the Tibyan Publications website.

AR: hey send me the 39 when u are done ... i wanna read it

* * * * *

AR has received 39 Ways.doc.

MEHANNA: still gonna add a cover ... make it look nice ...
and put it in PDF ... this is just ... ur
exclusive copy ;-)

AR: ooo mi cool now

MEHANNA: :-d¹⁵

AR: do u nkow have to make graphic covers

MEHANNA: no ... Tibyn [Tibyan Publications] ... they do

AR: o so u going to ask them to make it for u

MEHANNA: well ... this is ... for them ... they are gonna
release it¹⁶

AR: yeah ... i wish icould learn how to do that graph
stuff ... i wish we could live at a time where jh
[jihad] is like something ucould talk openly about
and live go wheneva u want ... live the old days

MEHANNA: heh ... keep dreaming habibi

AR: :'(¹⁷

By April 5, apparently MEHANNA had been able to contact Ibn Umar, who was working on finalizing *39 Ways*:

Abu Mundhir: did u get in contact with IU

MEHANNA: yeah ... he's editing it ... making it nice,
etc

Abu Mundhir: cool

MEHANNA: this should be nice, in sha' Allah [tr. God
willing]

Abu Mundhir: did u give him ... cover ideas

MEHANNA: hopefully it will lead to some real 'amal ...
no, I let him take care of that

Abu Mundhir: biithnillah

MEHANNA: he's good at that

¹⁵In online shorthand, ":-d" is one way to represent a smile; "-)" is another.

¹⁶As discussed below, *39 Ways* was in fact published and release by Tibyan Publications.

¹⁷In online shorthand, ":'(" is one way to represent sadness.

Abu Mundhir: yeah

By April 9, 2006, Ibn Umar had completed his part, and *39 Ways* was ready for release:

MEHANNA: dude ... *39* is done and PDF'd ... do u need to check it before it's released?
Abu Mundhir: uhm no not really lol
MEHANNA: ok ... so Ibn U has the green light?
Abu Mundhir: yeah

Abu Mundhir contacted MEHANNA later that day and asked about the cover for *39 Ways*. MEHANNA sent him a link so he could view the cover. After viewing it, Abu Mundhir said: "its really nice." MEHANNA responded: "-) [smile] ... I hope ... the book makes an impact." Abu Mundhir agreed: "inshAllah it does." They wanted *39 Ways* to inspire others to participate in violent jihad.

Abu Mundhir later told MEHANNA that he showed the cover to someone:

Abu Mundhir: ok i showed ... one brother the cover ... he loved it ... he said it reminded him of ... like anarchist ... cook book¹⁸ ... or omein [sic] kempf¹⁹ ... lol

On April 11, 2006, MEHANNA told AR: "the *39* book ... has been released officially." When AR asked: "... if u have it on pdf send it ova," MEHANNA sent a link where AR could find it.

¹⁸The *Anarchists Cookbook* is a book that contains recipes and instructions for the manufacture of explosives and other dangerous illegal items.

¹⁹*Mein Kampf* or "My Struggle" was written by Adolph Hitler as both an autobiography and to explain his political philosophy.

Both a complete pdf version of *39 Ways to Serve and Participate in Jihad* were found on MEHANNA computer, as well as a partial microsoft "doc" version. At the bottom of the pdf version the author identified the publisher as: "At-Tibyan Publications."²⁰

2. The Media Wing of al Qa'ida

On February 2, 2006, Abu Mundhir sent MEHANNA a link to demonstrate that "were [sic: we're] reall [sic: real) popular now ... we got our stuff pinned on big forums." In addition to bragging about the impact they were having, the also expressed their reverence for al Qa'ida's leaders:

Abu Mundhir: take a look ... at those 2
MEHANNA: ya u sent me those this morning
Abu Mundhir: yeah its different ... though they pinned ... them now ... and people making duaa [tr. prayer] for us ... in the threads ... one guy said
MEHANNA: Sweetness
Abu Mundhir: we are aqs [al Qa'idah] in raafidayn [Iraq] ... media wing²¹ ... hehe
MEHANNA: man, I don't think ... we deserve that title
Abu Mundhir: yeah
MEHANNA: maybe ... if we are lucky ... we get to clean their toilets

²⁰On February 15, 2006, an individual using the screen name Abu Sayyaf asked MEHANNA: "Do you know if TP [Tibyan Publications] has any rules or requierments regarding their books, that if they are translated to another language that you still have to have the "At-Tibyaan Publications" at the end of the book cover?"

²¹As discussed below, that is precisely the description of themselves that MEHANNA and his coconspirators used in some of their video productions, that is, "Released by the al Qaidah Network in the land of the Two Rivers," "Media Wing."

Abu Mundhir: lol ... yeah ... i was ... actually discussing ... this with a brother ...i was telling me i would be the happiest man in the world if ... the old man [Usama bin Laden] ... just let me hang around him ...and clean ... his toilet ... wallah

MEHANNA: heh

Abu Mundhir: love that guy

MEHANNA: dude ... This morning ...while I was trying to stay awake in class ...I was thinking to myself ... imagine how ...like, reporters from al-Jazirah [al Jazeera²²] must have felt ... waiting for Hadrami [someone from an area of Yemen]²³ to come out ... and start the interview ... like, thinking to themselves: "I am about to interview al-Hadrami."

Abu Mundhir: haha

MEHANNA: I'd like

Abu Mundhir: yeah

MEHANNA: wet my pants

Abu Mundhir: lol ... akhee ... imagine ...the reporter ...who has to report ... from Z ... now that guy ... will wet his pants

On February 2, Abu Mundhir encouraged MEHANNA to continue with their "media" activities in support of jihad:

Abu Mundhir: but seriously ... we need to continue with these efforts with the media its bearing ... its fruits

MEHANNA: Yeah ... we see now ... how good things come slow ... I mean ... I remember it was exactly a year ago ... when i was doing 'Wa Kadhalika ar-Rusul' ... and I was like...only like, 5 people ended d-loading it

Abu Mundhir: lol ... yeah ... u know ... even just ... how tampon [Tibyan Publications] started ... the site itself ... like 40 people ... or something like that ... we got to the point we had 2000 ... and we had to delete for security reasons ... and we still have like

²²Al Jazeera is the Arabic language news network.

²³i.e., Usama bin Laden, whose father was from that part of Yemen.

500 ... the last video ... 2000 downloads ...
within the first day
MEHANNA: hehe
Abu Mundhir: the site went out of bandwidth
MEHANNA: yeah ... it was like, the BlockBuster of TP
[Tibyan Publications]
Abu Mundhir: hehe ... yeah ... like star wars ...u know
...with this danish stuff²⁴
MEHANNA: hehe ...yeah
Abu Mundhir: i think it will bear more fruits
MEHANNA: dude
Abu Mundhir: for the jihadis ...in general

MEHANNA and Abu Mundhir were pleased with being the media
wing, but also sought to inspire an armed wing of al Qa'ida:

Abu Mundhir: were [sic: we're] pertty [sic:pretty] have
to continue this :) [a smile]
MEHANNA: Yup ... Maybe one day
Abu Mundhir: i just
MEHANNA: there will be
Abu Mundhir: hope JUS doesnt ... see this
MEHANNA: Kata'ib at-Tibyan
Abu Mundhir: lol ...thats ...what i was ...me and khubayb
...were talking about we justneed ... armed
... wing now hehe

3. Other translations and productions

On March 7, 2006, MEHANNA and Abu Mundhir discussed the
popularity of one of the videos which they helped produce and
their hope that their work inspires other jihadis to action:

Abu Mundhir: guh²⁵ is popular ... huh ... i was thinking

²⁴Danish cartoons that were perceived as insulting to Islam,
resulted in violent protests by Muslims.

²⁵GUH is a reference to a video concerning the "Expedition
of Umar Hadid," who was a terrorist in Fallujah, Iraq, and was
affiliated with Abu Musab al-Zarqawi, who was the leader if al
Qa'ida in Iraq. As discussed below, MEHANNA translated and
subtitled this video, and also had some role in creating some of
the graphics on the video. The GUH video was found on MEHANNA's

about it today ... how popular the eng
[english] verison is ... lol
MEHANNA: Yeah, wal-Hamdu lillah ... I just hope it ...
leads to action
Abu Mundhir: yeah inshAllah
MEHANNA: not just, "Let's watch it, and then go eat
some pizza"
Abu Mundhir: lol

On January 31, 2006, MEHANNA and "DS" discussed the fact
that another website, "JUS," i.e., *Jihad UnSpun*, was selling the
Umar Hadid video that MEHANNA translated without compensation.
MEHANNA didn't care that he was not being compensated for his
work = "as long as the message got out."

DS: Did you see that JUS is selling the Tibyan vid?
... \$25 and no citing the translator
MEHANNA: Which one ... the Umar Hadid one?
DS: na'am
MEHANNA: aha ... Oh well ... Who cares, man
DS: like 2 days after tibyan released it
MEHANNA: as long as the message gets out
DS: they were selling it ... I just think that is
dishonest
MEHANNA: luckily for us, insha-Allah, we are doing this for
Allah's Pleasure
DS: na'am
MEHANNA: so, they can make all the \$\$ they want

MEHANNA had worked on translating part of the GUH video; he
took credit for it during a conversation with "AAB" on February
7, 2006, and sent the link to AAB so that he could watch it:

MEHANNA: u got fast net, right?
'AAB: yea man

computer (file name:ghazwah-omar-hadeed-eng-low.rm[50034].ram_2).
The first frame of the video reads: "At Tibyan Publications
Presents." The second frame states: "The Expedition of Shaykh
Umar Hadid," "may Allah have Mercy on Him," "Released by the al
Qaidah Network in the land of the Two Rivers," "Media Wing."

MEHANNA: alright ... enjoy this: (Link: [omitted] ... U saw it before ... but, it is translated ... w/ some nice added scenes ... ;-) ... you'll love it

MEHANNA led AAB through the process of downloading the video²⁶.

MEHANNA: (Link: [omitted] ... scroll down to the last ad (Expedition of Umar Hadid) ... and click on the first link under it ... right click

'AAB: woah how long is this

MEHANNA: over an hour²⁷

* * * * *

MEHANNA: is it dloading? ... or is there no activity?

'AAB: its downloading ... its gonna be another hour

MEHANNA: OK, nice

'AAB: what is it what is it

MEHANNA: ? ... The vid?

'AAB: yea

MEHANNA: it's the Umar Hadid vid ... but, w/ added clips ... from habibuna ... and, its transed into English

'AAB: ohhh nice!!!

MEHANNA: by yours truly

* * * * *

MEHANNA: you'll love it ... trust me

MEHANNA ("yours truly") took credit for translating it into English.

The first few frames of the GUH video that was found on MEHANNA's computer contains words in English of dedication to the

²⁶On February 7, 2006, MEHANNA sent links to "AR" so that AR could view the Umar Hadid video. AR had seen an earlier version, but was told by MEHANNA "there is a version that has been translated into English ... with new stuff added onto it."

²⁷The file ghazwah-omar-hadeed-eng-low.rm[50034].ram_2 is just over 1 hour and 19 minutes long.

"prisoners in the prisons of the infidels" "in Cuba" and "in Abu Ghraib," "and the preachers and mujihadeen amongst us."

Following the introduction is a voiceover with subtitles. As set forth below, on February 7, MEHANNA explained that the voiceover was the voice of Abu Musab al-Zarqawi.

'AAB: :-D ... its workings ... working*
MEHANNA: it opened?
'AAB: yea
MEHANNA: the prison?²⁸
'AAB: hahaha :-Dyea man
MEHANNA: Abu Musab [al-Zarqawi] is the one talking
'AAB: really ... it doesnt sound like him
MEHANNA: not the poem ... the intro only ... is the quality of the pic good?
'AAB: oh, i passed that ... yea its excellent
MEHANNA: where u at now in it ... what time slot
'AAB: 455 ... haha this is awesome subhanAllah
MEHANNA: ;-)
'AAB: haha the part where hes taping the wires to the bomb in the car
MEHANNA: that clip ... was found on al-Jazira
'AAB: they showed it?
MEHANNA: just that part w/ the wiring
'AAB: man...
MEHANNA: that's Abu M talking agai ... again
'AAB: yea that sounds more like him ... man did that bomb actually destroy the tank completelty
MEHANNA: which one
'AAB: the part where a car drives by one way, then the tank drives by from the other way and blows up
MEHANNA: lemme see ... probably²⁹
'AAB: 18:13
MEHANNA: def caused some major organ bleeding
'AAB: hahaha

²⁸During the introduction, the video depicts computer graphics of a prison. After the Zarqawi speech, the prison is a background for pictures, including of prisoners.

²⁹Several video clips of military vehicles exploding as they drive over IED's are depicted during the segment of the video they are discussing at this point in the chat.

* * * * *

'AAB: yo who ws umar hadid exactly
MEHANNA: he was the commander of the Mujahidin in Fallujah
... he was killed last Ramadan ... when the
Americans invaded it
'AAB: ooh ok
MEHANNA: Abu Mus'ab told him to shave his beard and escape
... but he refused ... and stayed till he was
killed
'AAB: man, subhanAllah ... how come they dont show him
MEHANNA: they did
'AAB: when dude
MEHANNA: did u see the part ... 29:40 ... in the background
... thats him
'AAB: oh thats him ... ok i saw that ... mashaAllah ...
hes young
MEHANNA: ya ... it is reported that he said ... "I will
never leave Fallujah as long as there is one
single foreign Mujahid who has come here to help
us."

* * * * *

'AAB: its amazing so far ... wanta min ahlu
MEHANNA: there ... is more of the Shykh [Usama bin Laden]
at the end³⁰, I think
'AAB: ok maybe i can stay up a lil longer
MEHANNA: hHHahh ... no, sleep if ur tired
'AAB: im at 104:55 ... ill just finish
MEHANNA: miht as well ... MIGHT
'AAB: yea ... ok im gonna finish inshaAllah
MEHANNA: keep in mind
*** Auto-response from 'AliAB: I am away from my computer right
now.

³⁰At the point indicated by MEHANNA, the frame states: "Your Brothers in the Media department;" the next frame reads: "Al-Qa'idah in the Land of the Two Rivers." What follows, are words and the photo of "the Shaykh" i.e., Usama bin Laden. There are English subtitles. According to the English subtitles, of the martyrs depicted in the video, bin Laden states: "These youths wage Jihad against the Greatest Kufr (America) by their hands and souls. We ask Allah to accept them among the martyrs." The last 2 frames, after bin Laden, read: "Do not forget us from your supplications," "Your Brothers from At-Tibyan Publications."

MEHANNA: these guys are around our age
'AAB: subhanAllah
MEHANNA: go to 15:55 ... 1:15:55 ... that's the Shkhs prt
'AAB: alright ... maan ... that was amazing ... alright
akhi im gonna go to sleep ... jazakum allahu
khairun for sending me that
MEHANNA: OK, habibi ... take care.
'AAB: you too inshaAllah

On February 14, 2006, MEHANNA sent the following to AAB:

MEHANNA: Dude ... I found something nice for u
MEHANNA: (Link: [partially omitted] http:// ...
Osama%20Bin%20Laden%20video ...
MEHANNA: throw that in the download program
'AAB: nice one sec
MEHANNA: remember the clip at the end of the umar hadid vid
... where the shaykh [Usama bin Laden] was talking
'AAB: yea
MEHANNA: this is the entire speech ... translated into
English ... as well

On February 7, 2006, MEHANNA sent the "the Expedition of Umar Hadid" video to a person with the screen name of UK. After MEHANNA directed UK to the link which allowed UK to download the video in the shortest amount of time, he asked whether it worked. UK responded, "Awesome papa like it."

MEHANNA was involved in translating and distributing other videos and other media that were intended to inspire participation in violent jihad and glorify terrorist acts.

On February 5, 2006, Abu Mundhir asked MEHANNA "what do you think of doing the abu anas as shamee³¹ video in english ... bio

³¹Abu Anas Al-Shami, was born in the Palestinian West Bank, then under Israeli occupation. (The term Shami in Arabic refers to greater Syria, which includes parts of Jordan, Israel and the Palestinian Authority and Syria itself.) In the mid-1990s Abu Anas Al-Shami went to Bosnia where he embraced radicalism. In

video." Abu Mundhir suggested Abu Anas because "i was thinking abu anas one is pretty inspirational [sic: inspirational]."

MEHANNA agreed to do it: "good idea, bro ... excellent next proj[ect]."

They also discussed other projects:

Abu Mundhir: yeah ... cause ... i know a bro has already done ... wa yakoon³² in english ... and he gave it to us but requires heavy editing so if we do ... the abu anas its as if we ... did all htere videos ... with the exception of riyah al nasr

MEHANNA: OK ... I think ... the Abu Anas³³ ... takes precedence ... cause the wa yakun is very similar to GUH³⁴

Abu Mundhir: yeah

MEHANNA: OK, so can a bro transcribe it?

Abu Mundhir: yeah ... i will get ... someone too ... inshAllah

On March 8, 2006, Abu Mundhir sent another project to MEHANNA "wa yakoon ad deen,"³⁵ and asked him: "can you just go

2003, after USA invasion to Iraq, Abu Anas Al-Shami joined Abu Musab al Zarqawi in Northeastern Iraq. He soon became Zarqawi's second in command. Abu Anas Al-Shami was killed, in 2004, in Western Baghdad by an American missile strike.

³²"Wa Yakoon Ad Deenu Kulluhu Lillaah," was also a video released by "the Media Division" of "al Qa'ida in the land of the two rivers."

³³As stated above, "Abu Anas" is a reference Abu Anas Al-Shami, who was a terrorist affiliated with Abu Musab al Zarqawi.

³⁴As explained above, GUH is a reference to a video concerning the "expedition of Umar Hadid," who was a terrorist in Fallujah, Iraq, who was affiliated with Abu Musab al-Zarqawi.

³⁵"Wa Yakoon Ad Deenu Kulluhu Lillaah," was also a video released by "the Media Division" of "al Qa'ida in the land of the two rivers."

through that and edit ... what needs to be edited."

On March 24, 2006, Abu Mundhir again asked for MEHANNA's help in connection with a pro-jihadi video:

Abu Mundhir: akhee was wondering ... u got any ideas for an intro to the msg to the curry people [Pakistanis]³⁶
MEHANNA: what do u mean
Abu Mundhir: an intro
MEHANNA: isn't it a document?
Abu Mundhir: no its a video by the dr³⁷
MEHANNA: oh ... hmm... ... how about ... some footage ... of tribesmen
Abu Mundhir: ok ... but i want ... some ... thing to go with that ... like how we had a prison cell ... in the guh³⁸ ... not just clips

³⁶In April 2006, Dr. Ayman al-Zawahiri released a video "To the People of Pakistan."

³⁷MEHANNA often refers to Dr. Ayman al-Zawahiri as "Dr.," "Doctor," or Dr. Z." For example, on January 30, 2006, in an online exchange with "AbuTuraab86," while discussing the (then) latest message from al Qa'ida to President Bush, MEHANNA referred to Zawahiri as "Doctor," as follows:

MEHANNA: Did u see the Doctor today ... on Jazirah? ... he told Bush to accept Islam
AbuTuraab86: u sent me the article i didnt see the video though
MEHANNA: he kept referring to the Shaykh [Usama bin Laden] ... and saying: Hafidhahullah
AbuTuraab86: mashaAllah so hes alive walhamdulillah
MEHANNA: (Link: [partially omitted]
<http://english.aljazeera.net>
MEHANNA: Call to convert

Elsewhere in the tape - reported but not aired by Aljazeera - al-Zawahiri called on Bush to convert to Islam, telling him that if he does so he will "become a brother in the faith and God will forgive you your sins".

³⁸The GUH video was found on MEHANNA's computer (file name:ghazwah-omar-hadeed-eng-low.rm[50034].ram_2). At the beginning of the video (after the introduction that identifies it as "released by the al-Qaidah Network in the land of the two rivers," "Media Wing", there is computer animation (video) of a

MEHANNA: hmm
Abu Mundhir: anybody can do clips
MEHANNA: I'm not good at that stuff ... hehe ... I'm
 more of a clip guy ... but ... I will think
 of some ideas ... and get back to ui ...
 insha Allah
Abu Mundhir: k inshAllah ... i was gonna put hathrami³⁹ as
 usual ... from the interview with tayser
 alouni⁴⁰ ... where he crys at the end ...
 talking about
MEHANNA: yeah
Abu Mundhir: curry land [Pakistan]
MEHANNA: that's a given
Abu Mundhir: yea
MEHANNA: ok dude

On March 26, Abu Mundhir told MEHANNA: "i had an idea for the intro," and sent him a link to an article from Reuters entitled, in part, "US-SECURITY-PAKISTAN-PAMPHLET.xml."

4. Recognizing the importance of their efforts

On February 16, 2006, MEHANNA told Abu Mundhir:

MEHANNA: a brother I know in Masr [Egypt] ... the
 intelligence ... there ...they questioned him
 about me

Although he was concerned that Egyptian Intelligence Service had asked questions about him, MEHANNA assured Abu Mundhir that he would not stop his activities:

MEHANNA: so, I should be careful
Abu Mundhir: right ... which means?
MEHANNA: I don't know

prison cell.

³⁹"Hathrami" or "Hadrami" means someone from an area of Yemen, i.e., Usama bin Laden, whose father is from that area.

⁴⁰Tayseer Allouni is an al Jazeera journalist who interviewed Usama bin Laden after the 9-11 attacks.

Abu Mundhir: u will stop with the franchise?
MEHANNA: No, of course not
Abu Mundhir: just take the necessary precautions ...
important material ... buy usb key ... that
can hold 1 gig ... put it on there ...
encrypt it ... and use it like that

Abu Mundhir reminded MEHANNA of the importance of their work and
MEHANNA reassured Abu Mundhir that he would not stop, but just be
more careful:

Abu Mundhir: anyway what im saying is if we stop what were
doing then we have failed those guys and
failed a lot of people who rely ... on ...
the franchise
MEHANNA: I'm not saying we stop ... I'm just syaing
... at the moment ... it is better for me to
do so ...just till I figure out ... what the
deal is ... u kow ... know
Abu Mundhir: ok

MEHANNA helped make available to others the translated
materials distributed by at-Tibyan Publications. He also worked
with the administrators of the site. For example, on March 27,
2006, he had the following conversation with AR:

MEHANNA: check out this site
MEHANNA: (Link:
<http://www.muwahhideen.com/articles/>)<http://www.muwahhideen.com/articles/>
MEHANNA: it's all of Tibyan's translated stuff
AR: akhyy i cant get on the tawheed web site
MEHANNA: yeah ... they don't let any new members on
AR: i was not new ... i was working
MEHANNA: yeah ... but ... u never posted anything ... so
they deleted ur account
AR: o man ... i only had it for 2 weeks befor i went
ot masr
MEHANNA: they are uptight w/ security these days man
AR: too bad
MEHANNA: lemme talk to one of the admins ... and see what
the deal is ... insha Allah

B. Support for successes of the terrorists and setback for the American and other westerners, and rejection of moderation, and desire to leave the U.S. and not live amongst the "kuffars"⁴¹

1. Admiration for al Qa'ida leadership and their acts

MEHANNA and others with whom he shared a violent jihadi philosophy, often discussed and delighted in the receipt of the latest speech or video from al Qa'ida leaders, while delighting in the latest setback to the American mission in Iraq. They also seemed almost amused by some of the videos of captured westerners.

On January 30, 2006, while talking with Abu Mundhir, MEHANNA asked Abu Mundhir if he had seen "Doc's tape." From the context, it appears they were talking about a new tape from Dr. Ayman Zawahiri, who is a prominent leader of al Qa'ida (and a surgeon). (Abu Mundhir also stated: "i want to see the old man [Usama bin Laden] though.") MEHANNA also asked Abu Mundhir "did u see Jill Carroll in the new tape as well?" Carroll was a reporter who, while working for the *Christian Science Monitor*, was kidnapped in Baghdad, Iraq on January 7, 2006. Her kidnappers, who were followers of Abu Musab al-Zarqawi, released several videos of her during her captivity. Ultimately, after approximately 82 days of captivity, she was released. In response to MEHANNA's question, the following exchange took place:

⁴¹"Kuffar" is, generally, a non-believer, who does not recognize Allah and his prophet Muhammad.

Abu Mundhir: no just saw the pic
MEHANNA: She was...masha-Allah...lookin good as well
Abu Mundhir: lol i seen ... Abu Mus'ab's⁴² probably...
forget it

The two men found the whole ordeal of Ms. Carroll very amusing:

MEHANNA: why do u think ... they put a hijab⁴³ on her?
Abu Mundhir: lol ... no clue
MEHANNA: man ... they shouldn't have

* * * * *

MEHANNA: Abu Jill Carrol
Abu Mundhir: lol
MEHANNA: sounds nice... kayf halak ya Abi Jill Carrol
Abu Mundhir: akhee u think ... there [sic: they're]
getting ... a peice of that
MEHANNA: Yeah, dude
Abu Mundhir: lol
MEHANNA: if u notice ... the latest vid is from a diff
Jama'ah ... that means ... they're passing
around the dessert
Abu Mundhir: haha
MEHANNA: Iraqis, man ... they know how to treat a
woman
Abu Mundhir: lol

The search of MEHANNA's computer revealed many stored images and videos. Included amongst the stored images, were two copies of a still photograph from the video depicting the beheading of Nick Berg. Berg was a contractor from Pennsylvania, who was captured and beheaded in approximately May 2004. Abu Musab al-Zarqawi was given "credit" for killing Berg. The still photos on MEHANNA's computer show someone holding Berg's severed head.

⁴²This a shorthand for Abu Musab al-Zarqawi.

⁴³"Hijab" is the traditional head covering worn by Muslim women. Carroll wore one in some of the videos that were released during her captivity.

On May 28, 2006, MEHANNA and DS talk about having an upcoming movie night where they can watch jihadi videos involving al Qa'ida in Iraq leader Abu Musab al Zarqawi.

MEHANNA: we can have a movie night
DS: What movie? ... "State of the Ummah"?
MEHANNA: ni ... no ... Heads Up
DS: lol ... Heads Up?
MEHANNA: hehe joke
DS: Does it star Mr. Z?
MEHANNA: yes
DS: it shoud be Heads Off
MEHANNA: hehe yeah

MEHANNA and other individuals, including one with the screen name AAB and a second with the name E, often discussed the latest release from al Qa'ida, and showed their reverence for the al Qa'ida leaders and disdain for the U.S. leaders and troops. For example, during conversations in April 2006, they discussed a message and video from Abu Musab al Zarqawi, who was the leader of al Qa'ida in Iraq.

On April 26, 2006, Abu Musab Zarqawi released a recruitment video for al Qa'ida in Iraq in which he showed his face and proclaimed that he was leader of the organization. In it, he said that he would attack and kill the American crusaders. That evening, MEHANNA sent a link to the video to "T2," saying that it was the first time for "him" to be seen. T2 apparently only was able to access the audio portion of the file, so MEHANNA told him to come down to his, MEHANNA's room, to see the rest of it.

Multiple photographs of Zarqawi were found on MEHANNA's

computer.

On Apr 12, 2006, MEHANNA and ABOUSAMRA discussed the (then) latest tape from Ayman Zawahiri:

ABOUSAMRA: hey, is this doc [Dr. Ayman Zawahiri] audio new or old? ... that they posted on tp [Tibyan Publications]?
MEHANNA: haven't opened it ... guessing it's old ... but ... hehe ... the Shaykh [Usama bin Laden] says the same thing anyways ... hafidhahullah ... brb [be right back]
ABOUSAMRA: i don't know if this doc tape is old ... but he says alot of good things about mr. z [Musab al Zaraqawi] ... i don't understand why our fathers' generation is so pessimistic regarding the j [jihad] situation in the world. ... When everything indicates otherwise. ... in the tape he says he knew mr. z personally and knew him to be only a good man

Multiple photographs of Dr. Ayman Zawahiri were found on MEHANNA's computer.

On multiple occasions MEHANNA expressed support and indeed reverence for al Qa'ida and other terrorist leaders, and encouraged others to hear and be inspired by their words and videos. Another example of this occurred on May 8, 2006, when MEHANNA sent a link to M, and told him to "check this out." When M asked: "what is it about?" MEHANNA told him: "Abu Nasir al-Qahtani⁴⁴ ... Bagram escapee ... leading his first post-escape attack on 'uluuj. [tr. dirty infidel]" MEHANNA told him to go to a certain point in the video, " and see what he says ... it's

⁴⁴Abu Nasir al-Qahtani was an al Qa'ida fighter who escaped from Bagram prison in the summer of 2005.

awesome." On May 9, 2006, MEHANNA sent the same (or a similar) video to AAB:

MEHANNA: dude I saw the coolest blood donation clip today ... I want u to seeit

MEHANNA then sent a link: [omitted]

MEHANNA: go to 10:35 ... or 10:30, actually

'AAB: HAHAHA

MEHANNA: ;-)... this brother ... he's a Saudi ... he was in the American prison for the Mujahidin in Afghanistan ... but he managed to escape ... and this vid ... is from his first battle after escaping

'AAB: the one in the white turban

MEHANNA: the one who was talking, yeah ... his name is Abu Nasir al-Qahtani

MEHANNA sent the exact same link to E on May 8, 2006, and told him: "for starters, watch the video." E and MEHANNA then had the following exchange:

E: watching it now? ... Maghrebi?

MEHANNA: 10:35 on, specifically ... no, Abu Nasir al-Qahtani, Bagram escapee ... leading his first post-escape operation ... look @ what he says @ 10:35 ... :-D

E: this brother is something else

* * * * *

E: just watched the whole thing

MEHANNA: hehe

E: will watch it again several times more ENshallah

MEHANNA and ABOUSAMRA ("using screen name Ahmad AS")

discussed the same video on Apr 26, 2006:

MEHANNA: Aq ... on it

ABOUSAMRA: oh yeah, who is aboo naasir al-qah?

Mehanna: one of the 4 bros who escaped from Bagram ... the one who made that shi'r video

ABOUSAMRA: oh

MEHANNA and an individual using the screen name E also praised Abu Nasir al-Qahtani during a chat on May 10, 2006:

E: akhi, I want to have and raise a son someday like Abu Nasser al.Q ... make du3aa
MEHANNA: heheh ... akhi ... we all do ... the guy is ... like ... the Muslim T-1000
E: the guy is my rockstar

2. Admiration for the 9-11 hijackers and their crimes

In addition to his reverence for the leadership of al Qa'ida⁴⁵, on February 6, MEHANNA referred to the 19 hijackers of September 11 as the "19 martyrs." On February 6, 2006, MEHANNA told DS that while he had a CD of the tribute video to the 19 hijackers of September 11, 2001, he was looking for an online link so that he could send it to others.

MEHANNA also expressed support for the crimes of the 9-11 hijackers; for example, on June 9, 2006, the following exchange occurred:

M: may Allah's curse be on those that died in sept 11
MEHANNA: the people who say for Allah to have mercy upon the kuffar who were in it ... so I say ... may Allah have mercy on just the buildings ... not the kuffar that were in it ... as at least the buildings weren't kuffar

MEHANNA and his friends often joked about the 9/11 attacks and talked about the 19 hijackers as heroes. For example, on April 11, 2006, MEHANNA told AAB that "I found this lecture by

⁴⁵Their reverence for terrorists is in sharp contrast to their disdain for American leadership; on March 5, MEHANNA commented about something in the news about "Condi" (Condaleeza Rice). MEHANNA described her as a "dog."

Muhammad Hassan ... where he talks about the Shaykh [Usama bin Laden]." AAB asked him to "send it." MEHANNNA sent the link, and AAB, after viewing it, commented "this is awesome." MEHANNA then told AAB: "he makes a joke about 9/11... "Wallahi, I visited those towers - of course, this is before they were knocked down" ... then he starts laughing ... and the crowd does too." AAB responded: "hahaha i heard it ... hahahahaha"

On May 10, 2006, MEHANNA and AAB also talked about going to New York:

'AAB: nice, dude we should go to new york sometime ... again
MEHANNA: yeah soon as ur out ... I need to get some stuff ... and we never prayed inside Masjid al-Faruq ... where Sh. Azzam preached
'AAB: yea thats true ... iwanna see ground zero during the day ... ao i can make duaa [prayer] for our brothers :-D ... so*
MEHANNA: hehe ur never gonna get enough of that place ... yeah ... also ... make du'a' for the towers ... Rahimamullah
'AAB: hahaha ... ive been watching so many clips of it man

* * * * *

'AAB: i dont know man, those attacks were special
MEHANNA: yeah, subhan Allah...too bad there was this pizza place next to the towers ... that got wiped out
'AAB: haha

AAB then told him that he had just seen "that united 93 movie⁴⁶" and AAB thought it was "soo funny i was laughing

⁴⁶United Flight 93 was one of the planes hijacked on September 11, 2001, that was supposed to hit a target in Washington, D.C. It crashed in Pennsylvania when the passengers tried to regain control of the flight. Flight 93 was the subject

the whole time."

'AAB: it was soo unbelievable man ... it was so funny
how clueless the americans were
MEHANNA: One question: ... how did it end?
hahhhahahahahahahahahaahaahaaha
'AAB: lol
MEHANNA: :-d ... :-D:-D:-D:-D:-D:-D:-D:-D [big smile]

The two men then talked about several of the hijackers. It is clear that they had studied personal details of the hijackers' lives like others their age might talk about sports or political heroes. MEHANNA also reminded AAB of something he had given him ("remember the thing I gave u") wherein "the Shaykh [Usama bin Laden] names them one by one ... and mentions their qualities." They were particularly thrilled that "mohammed atta was in boston," and speculated that maybe "we saw him at the isb [Islamic Society of Boston] or something." They then viewed a video that depicted each hijacker and they talked about each one. MEHANNA also told AAB, in connection with one of the 19 hijackers:

MEHANNA: I had translated a biography of him ... a while back ... lemme see if I have it still

They continued their discussion concerning some of the other hijackers.

On May 14, 2006, MEHANNA and AAB also discussed the 9/11 Commission Report that apparently AAB was then reading.

'AAB: this book ... they try and make out the hijackers

of a motion picture by the same name.

to be uneducated barbarians ... which makes no sense, because those attacks were genius ... both the people that planned them and even more so the ones who carried them out

MEHANNA: yeah ... ah well ... at the end of the day ... there is a big empty space there

'AAB: lol

They also continued their discussion of some of the hijackers and planners, and their admiration for them; for example: 'AAB:

"mohammed atta⁴⁷ ... this guy was so awesome."

Approximately 30 photographs of the twin towers of the World Trade Center after the two planes struck on September 11, 2001, were found on MEHANNA's computer. In addition, photographs of some of the hijackers were also found, as was a photo of Mohammad Atta's U.S. visa.

In addition, MEHANNA and two friends visited ground zero and photographs from that visit were found on MEHANNA's computer. Two of the photographs are worth mentioning. In one, MEHANNA stands with another man who is unsmiling. MEHANNA, on the other hand, has a huge smile on his face. In another, three men are depicted. Again, one is unsmiling. MEHANNA and another man have a huge smile and are pointing their index finger upward. Copies of the photographs - with the faces of the other men masked, are attached hereto.

On February 5, 2006, MEHANNA and DS had a long conversation.

⁴⁷Mohamed Atta was one of the 9/11 hijackers on American Airlines Flight 11 that was the first plane to fly into the World Trade Center.

MEHANNA told DS that he had just sent their pictures from attending the ground-zero site of the September 11, 2001 attacks on the World Trade Center to some of his friends in Egypt, who themselves had been in Iraq (to combat the United States).

MEHANNA: I just sent ... some friends of mine in Egypt ... the pics of us at the grzr [ground zero] ... and they were like ... "Who are these terrorists?"

DS: lol

MEHANNA: they were joking of course ... they themselves were in rfdn [Rafidayn, i.e. Iraq]

3. Hatred of the United States and Americans, and desire to leave, the United States

MEHANNA shared a hatred of the United States and a desire to permanently leave the U.S. with many of those with whom he regularly communicated. For example, on March 30, 2006, during an exchange with and individual with the screen name M the following exchange took place:

M: i really hate to live in the country longer ... i wish to go back to arabia ... or some other place where i dont see these filthy kuffar

MEHANNA: heh ... join the club, akhi

M: which club lol

MEHANNA: the "I want to get out of here" club

On February 5, 2006, ABOUSAMRA expressed a similar sentiment: "i just hate this stupid kufr land ... i hate being surrounded by kaafirs."

MEHANNA and M again expressed their hatred of the U.S. and hope for our defeat, and support for the terrorists on April 25, 2006, while at the same time, MEHANNA warned M to be careful:

M: akhi do you have the link for shaykh abu qatadah's

site?
 MEHANNA: hmm ... is there one even working?
 M: there was one a month ago
 MEHANNA: hmmm ... not sure of it man ... akhi ... did u
 hear
 M: no problems akhi
 MEHANNA: about the vid
 M: oh yes mashallah ... i saw it
 MEHANNA: hehehe ... nice
 M: that gives more than one indication ...firstly
 that the shaykh is in a powerful position ...in so
 much that the americans and rawafid cannot reach
 him ... and secondly that he is in controll ...
 and he is moving the directions of the iraqi scene
 ...as he came out fearlessly with his appearance
 on the video ... and not fearing that this
 appearance would lead to identifying or detenting
 him, and this clearly indicates that he is not on
 the run ...rather the maggots are ..and that the
 shaykh is surrounded by a deeply trustworthy
 bitnaa who are bent on seeking victory
 MEHANNA: na'am ... hehehe
 M: i believe the evil gangsters in the white house,
 petnagon, the congress and cia are experiencing
 earthquakes
 MEHANNA: I believe
 M: at the moment
 MEHANNA: they are pissing their diapers
 M: the whole world knows they represent evil, and
 what they stand for is rotten fruits, and they are
 to perish as their stance is like the house of a
 spider
 MEHANNA: yeah
 M: may Allah curse this 3yesabates sawd ... wal
 mujrimeen ... i abhore and hate them, and my
 baraah is for them
 MEHANNA: Akhi ... (we're being watched...) ... for the
 hundredth time ... hehehe
 M: la3natullahi aliyhem let them see ... we are not
 breaking any of their filthy constitution ...
 their accursed "bill of rights" allows them to be
 bashed
 MEHANNA: ok akhi ... but ... be smart ... hehe
 M: oh yeah sure lol

On May 12, 2006, MEHANNA was asked by "I" whether he should
 accept a job for a company which does some work for the U.S.

government. MEHANNA responded:

MEHANNA: I am not going to give you a fatwa ... but
I: do u think thans an issue?
MEHANNA: if I were you
I: right
MEHANNA: I would not work for them ... but, that's me ...
even if your work indirectly helps them to help
the govt ... then stay away from it

A few minutes later, MEHANNA went on to explain his own
intentions to leave the United States:

MEHANNA: as soon as I'm done w/ school
I: non*
MEHANNA: I'm planning something called hijrah
I: yea ... unh
MEHANNA: cause I don't want to be offering my services ...
to kuffar ... while Muslims
I: fo sho
MEHANNA: are more in need of them ... esp. since
I: yea
MEHANNA: these kuffar ... many of them ... are at war w/
the Muslim countries
I: yea
MEHANNA: so ... it's on my mind 24-7⁴⁸

4. Taking pleasure in injuries to U.S. Servicemen

MEHANNA and several of the people with whom he regularly
communicated seemed to also be amused by injuries to American
soldiers; for example, on February 2, 2006, the following
exchange took place:

⁴⁸Consistent with these sentiments, at least one saved
internet conversation has been found on MEHANNA's computer during
the search of MEHANNA's computer seized on October 21, 2009. In
that document, a saved chat from September 21, 2009, MEHANNA
admonished a user named Alya not to come to the United States to
study, but rather, to stay in Saudi Arabia. Among other reasons,
MEHANNA explained that a Muslim should not leave Saudi Arabia to
live with the Kufar [infidel], unless it is for a legal reason.

Abu Mundhir: there [sic: they're] trying to scare us or something
MEHANNA: Yeah...maybe he is right... if the 20,000 US Troops wounded in Iraq can somehow grow back their blown off limbs
Abu Mundhir: lol

Similarly, on February 5, 2006, the following exchange took place, when MEHANNA sent an excerpt of a news article about deaths in Iraq to Abu Mundhir:

MEHANNA: 12 minutes ago

"KANDAHAR, Afghanistan - A land mine ripped through a police vehicle, killing six officers and wounding four in the latest of a wave of attacks that have rocked southern Afghanistan, officials said Sunday.
ADVERTISEMENT

The blast late Saturday in Kandahar province came after 48 hours of bloodshed that left 38 people dead as hundreds of Afghan and U.S. forces battled some 200 militants in the biggest fighting in months."

Abu Mundhir: lol ... things ...are getting nice there ...i read one article ...that a whole battalion was donated ... from z ...to there ...
MEHANNA: heh ... yeah, I'd believe it man ...they like their udhiyah [tr. Sacrifice] a little spicier

On another occasion on April 29, 2006, MEHANNA sent to AAB a link so he could enjoy a video of what is described as some Marines being blown up by an IED.

MEHANNA: check this out
MEHANNA: (Link: [omitted])

* * * * *

MEHANNA: it's a vid ... of ... a group of Marines ... seeing a wierd object on the ground ... so they stop to look at it ... as soon as one of them gets out and tries to dismantle it ... and says "I

think I got it" ... the thing goes off
'AAB: maaaaaaaaaaaaan ... i wanna seeee
MEHANNA: and all the Marines are yelling "O ****!!" ... the
ones that survive, that is
'AAB: haha ... lol

On March 21, 2006, MEHANNA sent T2 two videos depicting apparent improvised explosive device attacks on American soldiers. They talked about how the first depicted one explosion, and the second depicted more than one. They then shared a laugh about the videos.

On April 9, 2006, MEHANNA sent T2 a video of a recently downed helicopter and crew in Iraq. The video depicts the dragging of a soldier across the ground, and one who was lit on fire. MEHANNA called the video the "Hanes" video, an apparent reference to the fact that on the video, the pilot's underwear tag is conspicuously visible. MEHANNA joked that there was a Hanes commercial in the second half of the video. The video was released as a propaganda tool for al-Qa'ida in Iraq and its associates, and at the time was well publicized for showing that Zarqawi was targeting Americans in Iraq.

MEHANNA and his coconspirators, who shared videos and took real pleasure in the deaths of American servicemen, seemed to delight in the most horrific atrocities. For example, on July 12, 2006, the following exchange occurred:

MEHANNA: bro ... u want to see something
T: yeah sure man
MEHANNA: u remember ... the rape incident
T: yeah

MEHANNA: w/ the 14 yr old girl' ... u want to see ... the response?
T: yeah i do
MEHANNA: ok ... get ready ... and it ain't a statement from CAIR⁴⁹ [Council on America-Islamic Relations]
T: yeah if it was to that it would make me wanna vomit ... but i know this will put a smile on my face
MEHANNA: this is ... sick ... as in ... sick
T: even for the tv show i saw with u abu hammood and tamer came in ... sicker then those shows
MEHANNA: yes ... even sicker
T: ohh man
MEHANNA: but ... it shows the aftermath ... not the actual process
T: and its worse
MEHANNA: yeah ... they go ... all the way ... ull see ... and better yet ... they do it against ... hicks ... not Shiah ... the same baseball team ... that the rapist was on⁵⁰ ... they did it to them
T: oh the yankees ... yeah man i hate that team ... alot
MEHANNA: let's just say ... they got torn apart
T: i really wanna see this
MEHANNA: remember the movie Hostel
T: yeah
*** T has received juthath.rmvb.⁵¹
T: ok its done ... what do i play it with
MEHANNA: real player
T: wmp does play it ... oh damn ... 1 sec ... ist working
MEHANNA: :-) ... they specifically did this ... in response

⁴⁹MEHANNA and ABOUSAMRA are not supportive of CAIR's public relations efforts; on March 24, 2006, while chatting online, the following exchange occurred:

ABOUSAMRA: CAIR, Council Against the Islamic Religion
MEHANNA: Cows, Animals, Idiots, and Retards

⁵⁰In early July 2006, when a video was released of burned and mutilated bodies of two U.S. servicemen, the terrorists who took responsibility claimed it was in retaliation for the rape of a young Iraqi girl. The two murdered servicemen in the video were allegedly from the same division as the suspect in the rape.

⁵¹The video MEHANNA was discussing was saved on his computer File: juthath[75860].rmvb_1.

T: to the rape
T: on the st
MEHANNA: yes ... and they left the corpses there ... and
walked away ... u saw how they dissected the
bodies
T: yeah its still playing ... yeah
MEHANNA: u can see the ribs ... internal organs ... etc
T: thats waht the show states ... that it was
response
MEHANNA: yeah
T: man ... that was something
MEHANNA: heh yeah ... now ... they'll think twice ... when
they see an Iraqi girl
T: whats the deals in the courst ... r they being
tried?
MEHANNA: they will be ... but, who cares ... Texas BBQ is
the way to go⁵²

The next day, July 13, 2006, MEHANNA asked another friend if he had seen the video. MEHANNA asked A-S: "man ... did u see the vid of the mutilated uluj [tr. dirty infidel]?" When A-S responded: "no," MEHANNA described it as follows:

MEHANNA: man ... it was ... Texas BBQ sauce ... all the way
A-S: lol

On July 13, 2006, MEHANNA sent the same video entitled juthath.rmvb, depicting the mutilation of U.S. personnel to I2. MEHANNA encouraged I2 to send it to another person, and stated:

MEHANNA: man ... did u see the vid of the mutilated uluj
I2: no
MEHANNA: this was done ... in revenge for the rape ... of
that girl ... nice juicy BBQ

On July 14, 2006, while discussing military action in the Middle East, MEHANNA said to A-S:

⁵²T was asking if there was any progress on the legal proceedings against the suspected rapists; MEHANNA's preferred the method chosen by the terrorists to punish the crime.

MEHANNA: I want ... more BBQ sauce videos

The video that MEHANNA described as "Texas BBQ," about which he stated he "want[s] more" and "is the way to go," and for which he used ":-)" (a smile), was saved on MEHANNA's computer. It contains a horrific depiction of the mutilation of the burned bodies of what appears to be two U.S. servicemen. As stated above, MEHANNA saved the video on his computer. The third, fourth and fifth frames of the video contain the following:

"The Mujahidin Shura Council in Iraq"
"Information Committee"
"Presents the remains of two American soldiers who were kidnapped near al-Yusufiya"

The video then follows with a photograph of Usama bin Laden and the voice of bin Laden thanking the Iraqi mujahideen for their continued attacks on America and its allies. Bin Laden states that these attacks made all Muslims proud. The video then contains several minutes of individuals prodding, kicking and holding a severed head of what appears to be two American soldiers.

5. Rejection of moderation and cooperation

MEHANNA didn't just despise U.S. leaders, but he seems to feel the same way to any Muslim leader who advocates moderation and rejection of the extremists; for example, on June 12, 2006, AHMAD ABOUSAMRA (using screen name "Ahmad AS"), sent him the following: "It's about time Muslims owned up to the fact it's a Muslim problem," said Farzana Hassan-Shahid of the Canadian

Muslim Congress, adding she believes the community must forcefully denounce extremism. "We need to be more proactive, rather than issue statements of condemnation." MEHANNA's response to this was:

MEHANNA: She needs to be raped . . . with a broomstick
ABOUSAMRA: lol

Similarly, on June 28, 2006, MEHANNA had the following reaction to an MAS statement concerning the death of Abu Musab al Zargawi:

MEHANNA: look at the wala' of the Muslims to each other:
(Link: [partially omitted])
http://www.masnet.org/pressroom_release⁵³
AR: dahh elly a7naa fal7een feeh
MEHANNA: right ... bunch of women
AR: so asyadhom al kuffar will be happy
MEHANNA: walahi, I wish I could meet Mahdi Brey⁵⁴ ... and cut off his testicles
AR: i dondt think he has any
MEHANNA: yeah ... you're right ... ya'ni ... at least stay silent ... don't say anything, if u didn't like the man ... but why kiss behind like that?
AR: man this stuff make me lose sleep man and when u tell people they look at ur weird

On February 13, 2006, MEHANNA and DS talked about the

⁵³The link was to a statement by the Muslim American Society ("MAS") Freedom Foundation in reaction to the death of Abu Musab al Zargawi, that was posted June 9, 2006. The statement included condemnation of both the invasion of Iraq by U.S. forces, but also to the tactics of Zargawi. The statement included language such as: "There is a lesson to be learned from Zargawi's violent life and those who followed his lead. Violent means beget violent ends," and quotes from Mahdi Bray, Executive Director of the MAS Freedom Foundation.

⁵⁴Mahdi Bray was the Executive Director of the MAS Freedom Foundation. See previous footnote.

progress that they had made with influencing some other area youth, specifically naming two of their acolytes. They discussed how they could use the recent Danish cartoon controversy to their advantage. MEHANNA stated that the youth who were influenced by the Muslim American Society, were beyond hope, and could only be influenced with a baseball bat.

On July 19, 2006, MEHANNA had a conversation with AZ about how despicable Muslims who cooperate with the government are, citing to a then-recent report of a cooperating witness in a Canadian criminal case. MEHANNA said that this action has made the witness an infidel.

C. MEHANNA's experience in Yemen

On February 6, 2006, MEHANNA told "AAB" that he wanted to go to Yemen again, and described the school he went to, that was "more like a camp," where everyone walked around with AK-47s.

MEHANNA: I had a crazy idea, man

'AAB: what

MEHANNA: that you and I ... go study in Yemen ... as soon as u finish undergrad

'AAB: man that would be awesome ... inshaAllah, id love to do that

MEHANNA: I'm 150% serious ... when do u finish ... undergrad

* * * * *

MEHANNA: so anyway ... there's a school there ... that is very good

'AAB: is that the one that shaykh muqbils studens run or something

MEHANNA: hehe - yes. ... he is Masri ... and his name is Abul-Hasan ... like you

'AAB: haha mashaAllah

MEHANNA: I met his son
'AAB: abulhassans?
MEHANNA: yeah ... Abul-Hasan himself was on Hajj when I was
there ... but, they all walk around the camp ...
with camo jackets and AK-47s
'AAB: maaan, no way
MEHANNA: way.
'AAB: haha thats awesome
MEHANNA: It's more of a camp ... than it is a school

On April 1, 2006, MEHANNA told DS that he just got yelled at by his father for what he did two years ago (going to Yemen to train for jihad), and for arousing suspicion. For that reason, MEHANNA said he could not meet with DS. AHMAD ABOUSAMRA, who was then present with DS, then used DS' account, and wrote back, "they are disappointed in you, they want you to do it again." MEHANNA explained that his father thought that MEHANNA was part of an organization. Either DS or ABOUSAMRA asked "which one", and MEHANNA said he did not know. They then discussed having watched the Umar Hadid video, which MEHANNA translated, and they laughed with pride when "amajeed" asked who inserted the subtitles.

DS: yesterday we were watching uhadid vid. @ amajeed's
... so he asked, who put the subtitles ... in
english ... lol\\
MEHANNA: heh ... how come ... did he like the vid ... all
the tunisians
DS: he liked it

Later on April 1, DS and ABOUSAMRA again asked to visit MEHANNA or meet with him somewhere and MEHANNA responded that they didn't understand that his father would suspect that he was planning something related to jihad. DS' suggestion was:

DS: why don't you just tell him that he's right? ...
 see what he says.
MEHANNA: I'll just tell him ... we're planning a trip

On May 22, 2006, M told MEHANNA about his plans to live in Yemen, and asked him "tell me about marib" (a town in Yemen).

MEHANNA responded:

MEHANNA: heh ... it's a wild land ... very tribal ... full
 of bandits
M: have you seen tribe infighting there?
MEHANNA: and al-Qa'idah
M: you mean thieves with regards to bandits?
MEHANNA when I was there, there was no such fighting
 ...yes, theives ...also ...a lot of foreigners ...
 Egyptians ... from Jama'at al-Jihad ...who escaped
 Egypt in the '80s ... and came there ...but they
 are all fugitives ... and underground

D. MEHANNA's concern about law enforcement scrutiny

MEHANNA, while concerned about potential law enforcement scrutiny, nevertheless did not stop his pro-jihadi activities, because, in his view (as discussed above), they were important. However, he did attempt to encrypt some of his communications.

On February 21, 2006, Abu Mundhir encouraged MEHANNA to get a program that would encrypt his computer communications, and then helped him set it up.

On April 6, 2006, MEHANNA helped ABOUSAMRA download an encryption program.

On June 22, 2006, MEHANNA and AR discussed their concerns about what they kept on their computers:

AR: hey i found the book of muj" by basayav⁵⁵
*** AR is trying to send you "mo7adtrat.rar".
MEHANNA: link, man ... I don't want it saved on my comp
AR: sorry man the written i dont have a link to it
MEHANNA: it's on maqdisi's⁵⁶ site I think ... I'll open it
from there ... I'm trying to keep my comp free ...
from any stuff ;-)
AR: lol ... i deleted alot ... just keep the important
rare stuff
MEHANNA: yeah⁵⁷

In addition, MEHANNA warned some of his friends about what they said online; for example, on April 3, 2006, the following exchange occurred:

M: may our end be in martyrdom
MEHANNA: akhi
M: this world is accursed
MEHANNA: remember ... I am being watched ;-)
M: oh lol
MEHANNA: and I know that for a fact

On February 28, 2006, after expressing concerns about "Brian"⁵⁸, MEHANNA sent DS a link and instructions on how to download an internet security program which would help mask DS'

⁵⁵Shamil Basayev was a Chechen militant and Islamist. Basayev wrote a book entitled *Book of a Mujihadeen*.

⁵⁶Abu Muhammad al-Maqdisi is a jihad theorist who was the mentor for Abu-Musab al Zarqawi.

⁵⁷Consistent with this practice, at least one document has been found on MEHANNA's computer which was seized on October 21, 2009 which evidences that MEHANNA has received information related to or distributed by Abu Muhammad al-Maqdisi. The document is entitled a production of Manbar al-Tawhid wal-Jihad, which is the internet-based propaganda website of Abu Muhammad al-Maqdisi.

⁵⁸They regularly used "Brian" (and sometimes "Bob") as a code for FBI agents.

internet location, and thereby make law enforcement surveillance "much harder". In the same conversation, MEHANNA told DS to be cautious around one of their acolytes, who MEHANNA suspected could potentially be an informant.

MEHANNA: I'm not trying to arouse suspicion ... I'm just trying to be smart
DS: obviously ... I always practice a little takkiyah (hiding my beliefs) around those I don't really know... ... There is only a few people that I trust enough to be completely open with
MEHANNA: the only ppl I trust ... r u and Ahmad [ABOUSAMRA] ... period.
DS: I also trust Ali
MEHANNA: Well ... the younger they are ... the bigger their mouths are ... fact of life

On July 7, 2006, MEHANNA and DS discussed the risk of compromise of their pro-jihad activity and they thought about who might know about their activities and how to minimize the likelihood of compromise. They first expressed concern about one of their acolytes (who they had been trying to train) telling the FBI what they were doing. MEHANNA then explained that the acolyte they suspected of being an informant knew of his and ABOUSAMRA's trip to Yemen and its purpose because ABOUSAMRA's cousin told him. DS responded in coded terminology.

MEHANNA: what we were talking about ... before ... about Abu D knowing stuff ... he knows about
DS: na'am ... the Y [Yemen]?
MEHANNA: Abu Sab [Abu Sabayya, i.e., MEHANNA] and Fadls [ABOUSAMRA] field trip
DS: To the YMCA [Yemen]?
MEHANNA: ya
DS: who told him?
MEHANNA: Fadl's genius cousin

DS asked MEHANNA whether the acolyte knew anything about ABOUSAMRA's prior trips to Pakistan for the same purpose.

MEHANNA: so, he knows ... about everything ... the cheesecake ... the fake tires ... everything
DS: Does he know about al-Fadl's additional fieldtrips to P-town [Pakistan]?

MEHANNA explained that neither he nor ABOUSAMRA had confirmed anything which Abousamra's female cousin told the acolyte, but he could figure it out.

MEHANNA: then she just said ... "Did u know that Fadl and sabs did such and such...?" ... Sabs never confirmed w/ Abu D if this was true ... he just said ... "What the heck is she talking about" ... but ... Abu D isn't stupid

On February 12, 2006, MEHANNA expressed his concern to DS that law enforcement scrutiny would later inculcate him and their jihad-related activity, which they call peanut butter and jelly.

DS: I'm downloading some of Shaykh Abdullaah el-Faisal's lectures right now, alhamdulillah
MEHANNA: akhi ... don't reveal everything online
DS: I know
MEHANNA: that can be used againt u
DS: But these are publically available talks
MEHANNA: yeah, but still ... that doesn't matter these days
DS: against the Shee'ah and stuff ... not peanut butter and jelly [Jihad] stuff ... But I understand your point ... jazak'u'llaah khayr
MEHANNA: ;-)

E. MEHANNA's continuing interest in participating in violent jihad, and additional efforts to convince and radicalize others

Although he had been previously unsuccessful in his attempts to participate in acts of violence in support of jihad, MEHANNA continued to be inspired by Usama bin Laden and others and

maintained his desire to join with al Qa'ida, beyond just his media and other supportive activities. On March 23, 2006, he had the following exchange with AAB:

MEHANNA: yo ... go to ... memritv.com ... and check out the first clip
MEHANNA: (Link: [omitted])
MEHANNA: that
'AAB: about saudi mujahideen in iraq ... oh u sent me the link
MEHANNA: ya ... ya ... he talks about ... the shaykh
'AAB: man between the ages of 15-25
MEHANNA: yeah ... the shaykh himself was around 25 at the time
'AAB: man ... haha he said the shaykh is "the commander of the arab mujahideen in afghanistan"
MEHANNA: ;-) ... see how easy it was back then
'AAB: alhamdulillah, more reward for us
MEHANNA: check this next one out
MEHANNA: (Link: [omitted])

* * * * *

MEHANNA: hehe ... did u see the last clip
'AAB: yea
MEHANNA: akhi ... u should realize ... that such people ... when they were at their homes ... living with their families ... and interacting w/ their communities ... they were the most pious of all people ... and the most abstinent from the fallacies of the dunya ... they had attained a certain level of iman and 'ibadah and taqwa ... which qualified them ... for the status that they achieved ... so, think about what implications that has ... for you and I ... and how we live our lives on a day to day basis
'AAB: man subhanAllah ... subhanAllah akhi, the circumstances we live in today for leaving "for peanut butter⁵⁹" are unique
MEHANNA: hehe, indeed ... in fact ... the one who does so ... is pretty much though of as a nut case

On April 1, 2006, MEHANNA told ABOUSAMRA "I am almost done

⁵⁹"Peanut butter and jelly" was a code phrase for jihad.

... w/ 39." MEHANNA confessed to his friend "but ... honestly ... the more I do of it ... the more I fear ... Why do you say that which you do not do." Apparently, he was feeling guilty that he was not doing enough to personally prepare for and participate in violent jihad.

On February 8, 2006, MEHANNA and DS expressed their self-loathing for not having yet engaged in homicidal terrorism operations.

MEHANNA: did u see ... the pictures of the martyrdom operation?

DS: some brave mujaahid destroyed that traffic light...

MEHANNA: Masha Allah ... yes

DS: If only we had such courage ... alas we are cowards ... why do we say what we do not do?

On March 6, 2006, MEHANNA solicited "S" for recommendation to go to a school in Saudi Arabia. MEHANNA said he had already asked Imam Muhammad Masood, as well as his brother who had been an Imam in the Worcester area. S suggested that Muhammad Masood's other brother⁶⁰ studied there, and he may be able to give MEHANNA a recommendation. S asked MEHANNA whether his future plans were in pharmacy or in Islam? MEHANNA responded:

MEHANNA: Islam, insha' Allah ... at least for now ... I'm not ruling anything out

S: ic. and they don't mind that?

MEHANNA: but I would like to take advantage of my youth ... as long as I have a degree, that's all they want

⁶⁰Masood's other brother is Hafiz Saeed, who is the founder and leader of Pakistan-based designated foreign terrorist organization Lashkar e Tayiba.

... to be able to say: "Our son is such and such"
... u know how it is :-)

On June 8, MEHANNA and an associate who used the screen name "E" discussed the death of Abu Musab al Zargawi.⁶¹ It was an occasion for MEHANNA to berate himself for not doing enough to further the violent jihad conspiracy:

E: Celebrate man, our brother got Paradise Enshallah
MEHANNA: :-(
E: He got what he wanted ... too bad we're left with the mess here ... yaa bro, if all the video and clips that we see on the internet should teach us anything, is that there are a MILLION lined up to replace ... just as worthy, just as wa7sh, just as cunning just as on Islam, we just dont know their names ... make du3aa for them ... Allah knows them
MEHANNA: yeah ... ah well
E: NEXT ... we should get a group of bros together to pray Janazeh
MEHANNA: if it takes two American F-16s to kill you ... then you know you're something

* * * * *

E: to be honest, this brother is shaheed ENshallah,

⁶¹On June 8, 2006, ABOUSAMRA expressed loss over the death of Zargawi:

ABOUSAMRA: Man, I'm very sad. ... Like, his voice... no we can't hear it anymore.

* * * * *

ABOUSAMRA: They made the man into a giant of history. ... Maybe before, some people didn't respect him due to him still being alive. ... Although they supported him in general. ... Now his words have been made with blood. ... i'm not joking, i'm really sad... ... unlike abhjr or abhfs... we heard his tapes regularly ... full of emotions ... to the point that it felt like you knew the man personally ... and then this man who you felt like was you bst frnd ... suddenly murdered

he got what we all yearn for, so Meshallah 3leyh, I am not sad. I am happy for him. Anyone who knows anything knows that we are just at the beginning..... ... but what makes me sick is the nifaq

MEHANNA: bro ... what makes me sick ... is me

E: your life isn't over akhi, hope for the best and PREPARE PREPARE PREPARE

MEHANNA: bro

E: can any of us run a mile in 7 minutes? ... no

MEHANNA: take it easy ... online ... ;-)

E: I know

MEHANNA: but, I mean ... u know

E: I know what you mean

MEHANNA: to be honest ... I wan't thinking about him too much ... I was thinking about me ... and what I am doing ... for this Din ... and those around me

E: its good to think this way but dont be too hard on yourselfthere are other things to consider

Similarly, on February 28, 2006, while expressing their love and admiration for a number of the terrorist leaders, including "Abu Anas,"⁶² "omar hadeed,"⁶³ "abo mohamed al magdesy,"⁶⁴ "Sayyid Qutb,"⁶⁵ "Abdullah 'Azzam,"⁶⁶ and others, AR and MEHANNA also

⁶²In the mid-1990s Abu Anas Al-Shami went to Bosnia where he embraced radicalism. In 2003, after USA invasion to Iraq, Abu Anas Al-Shami joined Abu Musab al Zarqawi in Northeastern Iraq. He was appointed to the advisory council of al-Tawheed wal-Jihad and soon became Zarqawi's second in command. Abu Anas Al-Shami was killed, in 2004, in Western Baghdad by an American missile strike.

⁶³Umar Hadid was a terrorist in Fallujah, Iraq, who was affiliated with Abu Musab al-Zarqawi, who was the leader if al Qa'ida in Iraq.

⁶⁴Abu Muhammad al-Maqdisi was considered the spiritual mentor of Abu Musab al_Zarqawi.

⁶⁵Sayyid Qutb was an Egyptian Islamist of the 1950s-1960s who was executed. His philosophy was at the heart of the Egyptian Muslim Brotherhood. Some subscribers to this philosophy

discussed their own feelings of inadequacy:

AR: man wallahi man i love all of them more then myself ... man hearing abotu them hurts me so much man it reminds me where they are and where iam ... man the list goes on ... abo yahya⁶⁷ ... and abo hamza al masry⁶⁸

* * * * *

AR: man i never knew man that u could love poeple u never talked to or saw in real life this much ... to the point that u would give ur life for them

* * * * *

MEHANNA: akhi ... have u heard ... the explanation of Thawabit 'ala Darb al-Peanut Butte ... by Shaykh Yusuf⁶⁹

AR: no onaly one of the tapes worked

MEHANNA: ok

AR: the english one

MEHANNA: I fund a working link

AR: i lisented to it

MEHANNA: (Link: [omitted])

MEHANNA: go down to Anwar al Awlaki

MEHANNA: (Link: [omitted])

* * * * *

went on to form Al Qa'ida.

⁶⁶Abdullah Azzam was a teacher and mentor of Usama bin Laden and helped persuade Usama Bin Laden and other pro-jihad foreign Muslims to go to Afghanistan to aid the jihad. He was assassinated in 1989.

⁶⁷Abu Yahya al-Libi is a member of al Qa'ida and fought with the mujahideen in Afghanistan.

⁶⁸Abu Hamza al Masri (i.e. from Egypt) is a radical Imam in London, who fought in Bosnia and Afghanistan with the mujahideen.

⁶⁹*Thawabit 'ala Darb al-Jihad*, or "Constants on the Path of Jihad," by Sheik Yusuf al-'Uyayree. As discussed above, "peanut butter" was code for jihad.

MEHANNA: when compared to these people
AR: i know man most of us are man ... it hurts ...
hurts ... man u have no diea ... i like think
about it so much ... man u know i have so many
high dreams and hopes but i feel like im so small
and i keep making zonoab my dreams are just so
much biger then me
MEHANNA: dreams ... are there ... so that u can try to
fulfill them
AR: i know man i wish i could just get myself straigh
MEHANNA: Akhi ... just keep doing what you're doing
AR: man i feel so bad man that al nass deeh no body
knows them man ... i wish more youth would know
them
MEHANNA: that's why ... they are called al-ghuraba' ...
yeah, man ... if more youth knew ... things would
be so different

On June 8, 2006, AR and MEHANNA also discussed the death of
Abu Musab al Zargawi; AR told MEHANNA: "i could not stop crying
all day ... i tried callin u ... man i never been so sad about
anyone even my own grandmother like that."

AR: did u see his pic
MEHANNA: yeah
AR: man he looked so beautiful ... his face is full of
light ... my dad woke me up at 7am or something to
tellme and i could not sleep since then

On February 8, 2006, MEHANNA and DS discussed who are the
appropriate Jihadi scholars from which to learn for more than
"general love and respect".

MEHANNA: who can u really go to? ... well ... all of the
scholars of J [Jihad] ... no question ... like,
Abdul Qadir Abdil Aziz, Abu Muhammad, etc ... but,
if ur talking like mainstream

They then specifically named a number of pro-jihad scholars such
as: Shaykh Muqbil, Abu Anas ash-Shami, Abu Muhammad, Abu Muhammad
al-Maqdisi, Shaykh Bin Baz, Imam al-Albaani, Imam Abdullaah

Azzam, Shaykh Abu Hamza al-Misri, Abu Hamza, Ahmad Jibril.

On July 8, 2006, MEHANNA and N discussed an apparent discussion occurring on the internet. MEHANNA responded that he should only follow those who have knowledge as well as zeal. Specifically he mentioned Abu Muhammad (Zawahiri), Abu Qatadah and Abu Mus'ab (Zarqawi). After criticizing the person with whom MEHANNA was engaged in an online argument, MEHANNA said that the person did not have any response to whether he had a legitimate excuse as to why he was not either in jail or in jihad. MEHANNA and N then complained about the fact that people like this adversary were too busy merely watching videos and not doing anything, as if they were blowing themselves up or beheading the Jew. MEHANNA then said that he (Abu Sabaaya) translated the Umar Hadid video, but afterwards, realized that the people who watch it think that watching these "jihadeos" was all that was necessary, that they were so close to the mortar round that "Usamah" would be proud.

On April 15, 2006, MEHANNA and a person named N, who appeared to be in New York, had a long conversation about a number of topics. N asked MEHANNA how the Dawah, or the spreading of the faith, was going in the Boston area. MEHANNA, exasperated, answered that there were only like 3 people in the area who understood what the faith was about, and that he was one of them. MEHANNA then went on to say that he was "working on it"

and that he was trying "one-on-one efforts like, befriend a person slip stuff in here and there", to which N said, "recruit, brainwash", and MEHANNA agreed. MEHANNA agreed that they could not march forward until they get some numbers (of similarly-minded people). N disagreed and said that his group of four was enough, and that if MEHANNA was one of three "hardcore" brothers, then he was all set to do "demos", and also to spread the faith.

On February 1, 2006, MEHANNA had a long conversation with DS in which he talked about the progress in his efforts to create like-minded youth, as well as made reference to his trip to Yemen with ABOUSAMRA. Both of them named people with whom they had made progress by slowly sending them the works of certain scholars of jihad.

MEHANNA: I was talking w/ Abu D⁷⁰ ... he is starting to see things the right way
DS: I noticed ... I've been working on Hamza P. and Insaf myself
MEHANNA: I lent him the state of the ummah cd ... and after he saw it ... he told me ... "Things are much clearer now."
DS: I've been sending them stuff by Shaykh Hammoud al-Uqla and Abu Muhamamd al-Maqdisi ... Nothing to over the top
MEHANNA: Yeah ... just the basics

The pair joked that ABOUSAMRA was forming a Brigade with these young acolytes called the "Shukri [Abousamra] Brigade," who would rival the Abu Hafs al Masri Brigade, an al Qa'ida related terrorist organization.

⁷⁰The name has been altered.

On February 4, 2006, MEHANNA and DS discussed an incident where one of their acolytes questioned whether there were any pre-conditions to engaging in jihad, and was summarily excoriated by ABOUSAMRA, who said that it was a duty to engage in it without delay.

On February 25, 2006, MEHANNA told T3 to download a specific video from a link which he sent him. T3 asked whether the document was a "jihad recruiting video", and MEHANNA said that it was a "documentary". T3 said that he was watching the introduction and asked MEHANNA what Rafidayn means, MEHANNA explained that it meant the two rivers, Tigris and Euphrates (the land of Iraq). T3 then said:

T3: it took like 20-30 mins to download ... when it finished ... it turned out to be like a jihadi recruiting video

MEHANNA responded by saying that he would send him a similar one, and then did send a link to another video. T3's response was "yo u knows hardcore".

On February 27, 2006, MEHANNA had a long conversation with T3 about how to influence people to embrace the jihadi scholars slowly. MEHANNA said:

MEHANNA: u don't have to come out with everything at once ... not everyone is ready for everything ... like, start with stuff ... that people can easily accept

On February 28, 2006, MEHANNA explained what he thought to be the greatest form of jihad.

T3: can there be a political or intellectual jihad
MEHANNA: yes ... but the form that is the highest ... is,
well, u know
T3: u kno the hadith ... when RasulAllah(sallahu
alayhis wasalaam)... said the best of jihad is the
one who stands up to the tyrants
MEHANNA: yes ... do u know why? ... do u know why this is
the best?
T3: its the hardest?
MEHANNA: b/c ... generally ... when a Muslim stands up to a
tyrant like this ... the tyrant ends up killing
him ... to he attains shahadah

On February 14, 2006, MEHANNA sent AZ a link to a video. AZ explained that he was at work, and asked whether he could open the video without going to jail and whether it had any "training." MEHANNA replied that it was a semi-documentary, and that there were no beheadings or anything.

On April 3, 2006, MEHANNA directed AZ to some pro-jihad literature.

MEHANNA: U want Walaa' and Baraa' ... and PB and J⁷¹ ...
there it is
AZ: yes ... is it from mawdudi himself?
MEHANNA: no ... it's from ... a Pakistani ... scholar ...
named ... Mas'ud Azhar ... he was one of the
commanders
AZ: is he jamaat islami ... ??
MEHANNA: of the Kashmiri muj

On April 7, 2006, MEHANNA sent a link of a video to AZ and said the following:

MEHANNA: I want to show u a video ... of the bravest people
... in the world
MEHANNA: (Link: [omitted])
MEHANNA: :-D
AZ: where are the pbj-ers?

⁷¹As stated above, "P B and J" is code for violent jihad.

MEHANNA: they are the ones firing the mortars ... at the base

On June 3, 2006, MEHANNA updated Maldonado about a recent gathering of several of their mutual friends in the Boston area at which ABOUSAMRA and another person were discussing "who it is halal [proper] to kill." MEHANNA expressed frustration that ABOUSAMRA was not trying to persuade people through Islam anymore. In the same conversation, MEHANNA encouraged Maldonado to listen to a pro-al Qa'ida lecture by Anwar al Alawqi, a U.S.-born ideologue living in Yemen, in which Alawqi "pull[ed] no punches."

On July 29, 2006, MEHANNA and DS discussed the progress of one of their acolytes. They appreciated that the acolyte praised Ibn ul Khattab (jihad leader in Chechnya) and Abdullah Azzam, and that he bashed Egyptian president Hosni Mubarak. They said he was making progress.⁷²

DS: Oh, Esmail was also praising Khattab and A. Azzam
MEHANNA: heh nice ... what was the context?
DS: just praising their character ... and saying they are good examples of Muslims in our times
MEHANNA: we should get Ismail a TP account
DS: well, I don't know about that ... But I think he is headed in the right direction ... insha'Allaah ... He also kept bashing Hosni Mubarak

Evidence found thus far on MEHANNA's computer which was seized on October 21, 2009 further demonstrates that MEHANNA

⁷²This "teaching" of others is particularly concerning given that MEHANNA apparently has been teaching his interpretation of religion and science to fifth-eighth graders at a local school.

continues to spread the word of the pro-jihad scholars. For example, among the documents located is one prepared by "The Martyr 'Azzam Center [...] Peshawar, Pakistan, which refers to the teachings of Sayyid Qutb and discourages anyone from leaving the land of jihad to go live in America, which is the world of polytheists. In another document which appears to have come from Abu Muhammad al-Maqdisi's website, the author indicates that he has written a book during his imprisonment, which he gave to some brothers in Pakistan. The author explained, "it is enough for you to have a jihadi mind and to acquire weapons; whenever an armed person was captured, we found he had this book." The author continues that the reader should disassociate himself and be an enemy of the kuffar [infidel] because they are the enemies of Allah. Consequently, the author stated, that the reader should not obey the tyrants and their laws.

**F. Additional Conversation re: support for bin Laden -
MEHANNA: "my real father"**

On April 28, 2006, MEHANNA had a very revealing conversation with AAB concerning his relationship to and inspiration by Usama bin Laden (as well as his desire to help and educate⁷³ the less knowledgeable man, i.e., AAB):

MEHANNA: that book ... about the Shaykh ... the orange one
... the intro to it ... I read it in the Harvard

⁷³On March 22, 2006, MEHANNA spent a great deal of time explaining to AAB the role of the Arab mujihadeen in the Chechen conflict.

Coop the other day ... and started crying
'AAB: which book is this
MEHANNA: Messgs to the world⁷⁴
'AAB: ooh ... lematha
MEHANNA: the way they were describing him ... made me realize ... how much he truly gave up ... and why he gave it up ... and then I realized ... that I look to him ... as being my real father, in a sense
'AAB: that man...subhanAllah
MEHANNA: u know how ... some u'ama ... ulama say ... everytime u read the Qur'an ... u learn something from reading a particular verse ... that u didn't pick up before
'AAB: yea
MEHANNA: yeah ... for me ... it' like ... every time ... I see him speak ... or read anything about him ... I love him ... more than I did before
'AAB: subhanAllah
MEHANNA: without exception ... and I have been following him ... for over 6 yrs now ... from the moment I saw him ... the hair on my arms ... stood on end ... without even knowing who he was ... or what he was all about ... he's the reason ... I started practicing
'AAB: wow really
MEHANNA: yeah ... Jazah Allah khayr al-jaza'
'AAB: amin ... u know how i feel about him
MEHANNA: anyone with manhood ... and ghirah ... feels the same way about him
'AAB: yea man, subhanAllah, with me ... ever since i really felt attatched to him, and following whats happening with him ... well before i found the stories of the sahabah and the tabiyeen and the great scholars to be amazing ... and i was jealous that we didnt have people like that ... now, because of him, i dont have that feeling at all anymore ... i dont even see a difference bewteen them
MEHANNA: yeah, u feel that there's hope in the world ... u have ... a living example ... of taqwa ... like ... u know ... there is this sahih hadith ... where the Prophet ... that the awliya' of Allah

⁷⁴There is a published book available that is entitled *Messages to the World The Statements of Osama bin Laden*, edited and introduced by Bruce Lawrence. The cover is orange.

... are those whom ... when you simply look at them ... u remember Allah. ... just by looking at ... ur iman goes up ... I cannot think ... of a single person on earth ... without exception ... that fulfills this ... he's ... the 'Uthman bin 'Affan of our times ... took all his wealth ... gave it to the jaysh

'AAB: subhanAllah, man its hard to believe someone like that even exists

MEHANNA: even Abu Musb ... as ma sha Allah as he is ... but even he looks up to him ... and considers him his Shaykh ... wallahu A'lam

'AAB: yea that was amazing

MEHANNA: akhi ... do u need anything else from me ... before I log off

'AAB: i think bithnil Allah i am allah set ... jazakum allahu khairun

MEHANNA: call me in the morning

'AAB: i really appreciate the help

MEHANNA: if u need ANYTHING ... anything at all

Numerous photographs of Usama bin Laden were found on MEHANNA's computer.

G. The lessons of *39 Ways to Serve and Participate in Jihad*

As stated above, the defendant MEHANNA translated, and presented to at-Tibyan Publications for distribution, the book *39 Ways to Serve and Participate in Jihad*. We will not attempt to summarize the entire book in this submission. (A printed copy is attached hereto.) However, it is clear from many of the excerpts discussed above, that MEHANNA was serving jihad, and following many of the "Steps" set forth in *39 Ways*, which was translated by him for more wider distribution and availability.

Leaving no doubt that, when discussing "jihad" the author of *39 Ways* means "terrorism," in the Introduction to *39 Ways* the

author states that "the entire world has announced its war on terrorism - or, rather, on *Jihad*." *39 Ways*, at page 5. "[W]hen the word '*Jihad*' is mentioned, it refers to *qital*," (which is translated to mean) "fighting." Further, "there is nothing more obligatory upon Muslims after having belief in Allah than *Jihad*." *39 Ways*, at page 5. "*Jihad* is the *Ummah*'s only choice." Id.

Step 2 is "Truthfully Ask Allah for Martyrdom." *39 Ways*, at page 9. MEHANNA authored a poem entitled "Make Martyrdom What You Seek." On July 25, 2006, DS asked MEHANNA whether he wrote the poem "Make death what you seek" which was available on the internet. MEHANNA confirmed that he had and marveled that it was still available on-line. It was still available and was discussed in 2009. A copy is attached hereto.

On March 13, 2006, AR and MEHANNA talked about working out (running and lifting) and encouraged each other to continue. In a vacuum, such a conversation between two men in their twenties would have no great significance in connection with charges of material support. However, when placed next to the directives in *39 Ways* (Step 25: "Become Physically Fit") and in the context of most of the conversations between MEHANNA and AR that support jihad and the leadership of al Qa'ida, the reason for their interest in physical fitness is seen in a different light.

Many examples were described above wherein MEHANNA and many of his like-minded associates discussed and praised the actions

of al Qa'ida and other terrorists. He spread praise for the individuals and glorified their military successes. In *39 Ways*, the author directs the readers to "praise the *Mujahidin* and to raise one's head with them and to boast their actions and mention their stories and what occurs to them ..." *39 Ways*, at page 22. (Step 12: "Praise the *Mujahidin* and Mention their Accounts and Call the People to Follow in Their Footsteps.") The purpose of this discussion is not idle gossip, but rather, "in mentioning their stories, there is a call for the people to follow in their footsteps." Id. Similarly, the reader is urged to "Follow and Spread the News of the Jihad" (Step 21). *39 Ways*, at page 33. MEHANNA, as instructed by the teachings in *39 Ways*, acted "out of love and concern for *Jihad*, ... [he was] happy when they (the *Mujahidin*) are happy, and he is saddened when they are saddened." Id. "Therefore, it is necessary to spread the news and messages of the *Mujahidin* between Muslims." *39 Ways*, at page 34.

"[T]he most important methods available to one who cannot make *Jihad* himself ... it is upon him to incite others." (Step 16: "Call and Incite the People to Jihad.") *39 Ways*, at page 28. As described above, MEHANNA (and ABOUSAMRA) encouraged others (not just Maldonado).

As discussed above, MEHANNA was a teacher who provided information to others who were less knowledgeable. In *39 Ways*, the author directs the readers to "Advise the Muslims and the

Mujahidin" (Step 17). The reader was also urged to "Speak Out For the Mujahidin and Defend Them," (Step 14).

MEHANNA often criticized those in Muslim community who urged moderation or criticized the violent tactics of the mujahidin; MEHANNA was taking the step that urged him to "Expose the Hypocrites and Traitors" (Step 15). Similarly, he often expressed true hatred for, for example, U.S. leaders and other "infidels." (Step 31: "Have Enmity Towards the Disbelievers and Hate Them.")

MEHANNA participated in message boards and other forums for discussions. His efforts were intended to "assist the *Jihad* on the internet." *39 Ways*, at page 45. (Step 34: "Electronic Jihad.") "[T]his is a blessed field which contains much benefit, such as following and spreading of news between the people, in addition to a chance to defend and stand up for the *Mujahidin* and spread their ideas and their requests to the people." *Id.*

As for the discussion boards, then a group of brothers should get together and assign each other from the well-known discussion boards to register in and post messages that fall into the following categories:

- * Inciting to *Jihad* and mentioning its virtues, especially in our times
- * Defending the *Mujahidin* and protecting their honor from any who speak ill of the[m]
- * Awakening the idea of *Jihad* in the minds of the masses
- * Putting out researches and knowledge-based articles related to *Jihad*
- * Going after those who oppose *Jihad* from

amongst the modernists and apostates,
and exposing their faults

So, the brothers should spread these messages throughout each discussion board on a daily basis so that each subject is posted, and then the other brothers can respond to the postings on each board in order to keep it at the top of each forum.

As discussed above, MEHANNA was also constantly sharing speeches of al Qa'ida leaders in video, audio and text files, and other pro-jihadi media. He was thereby following Step 22, that directed him to "Participate in Spreading Their Releases of Books and Publications." *39 Ways*, at page 34. "[I]t is necessary for you to think of spreading everything related to the *Jihad* and that which incites and calls to it in order to aid its people, and to make use of various methods of doing so. For example, collecting heroic accounts involving sacrifice and bravery, Xerox-copying them, and distributing them amongst the people and on the internet." *39 Ways*, at page 34. MEHANNA took it a step further and created media projects - following the instructions "everyone should try and prepare some media projects regarding *Mujahidin* and their affairs." Id. ("[I]f you are incapable of releasing something yourself, then it is upon you to spread any thing related to the *Mujahidin*, of publications, books, etc. in order to serve the *jihad* and the *Mujahidin*." *39 Ways*, at page 35.)

The United States anticipates presenting at trial the testimony of one or more witnesses, concerning both the use of

the internet in furtherance of the international terrorist conspiracy, as well as the importance of MEHANNA's translation of *39 Ways*. MEHANNA's version, which was distributed by Tibyan Publications, is the most widely distributed and is acknowledged as the most accurate. It is anticipated that there will be testimony that MEHANNA's version is the version found on hard drives of other terrorism defendants around the world.⁷⁵ In addition, MEHANNA's version is the one that is the basis for translations into other languages. MEHANNA is not an inept, "wannabe" jihadi -- particularly in connection with "electronic jihad," he was very important and successful. The only failure in MEHANNA's mind was in failing to fulfill his desire to participate personally in crimes of violence directed at U.S. personnel and interests.

V. Factors to be considered

[I]n determining whether there are conditions of release that will reasonably assure the appearance of the [defendant] ... as required and the safety of the community, [the Court shall] take into account available information concerning -

- (1) the nature and circumstances of the offense charged, including whether the offense is a crime of violence ... a Federal

⁷⁵As described above, MEHANNA desired to translate materials which brought people to violent action. This is also consistent with information which showed MEHANNA's desire to emulate his heroes. For example, as recently as October 21, 2009, MEHANNA had a document on his computer from Abu Muhammad al-Maqdisi's website which explained, "whenever an armed person was captured, we found he had this book."

crime of terrorism
(2) the weight of the evidence against the [defendant] ...
(3) the history and characteristics of the [defendant] ... including -
 (A) the [defendant]'s ... character
 ...
(4) the nature and seriousness of the danger to any person or the community that would be posed by the [defendant]'s ... release.

18 U.S.C. §3142(g).

The defendant is charged with "a Federal crime of terrorism" that "is a crime of violence." As set forth in the affidavits identified above and in the additional evidence set forth herein, the strength of the evidence against the defendant is strong, and includes several cooperating witnesses⁷⁶, consensual recordings, and other evidence of the defendant's own statements and actions in support of terrorism, some of which were recorded on, and obtained pursuant to searches of his computer.

The defendant has demonstrated by his words and actions that he fully intends to leave the United States permanently. When he was arrested in November 2008, he was about to board an airplane to begin a one-way journey to Saudi Arabia, where he had obtained employment.

⁷⁶The cooperating witnesses discussed in Agent Nambu's affidavits (and in the Affidavits submitted in support of the Complaint and Search Warrants in this matter) are not the only witnesses who have corroborated the allegations contained herein (and in the charging documents in this case). Other individuals with personal knowledge of the actions and statements of MEHANNA and ABOUSAMRA, have given similar testimony and have provided similar information.

From the quotes set forth above, there can be no doubt that he hates the United States, despises our leaders, takes great pleasure in our defeats, and will continue to work in support of our enemies. (While these beliefs are protected, his actions in furtherance of them are not -- and he will be better situated to engage in these activities outside of the United States than within.)

This is not a case in which a government agent assisted the Defendant in an attempt to commit a crime.⁷⁷ The cooperating witnesses discussed in the affidavits listed above all began to cooperate after much of the activity and statements discussed herein. The Defendant and some of his coconspirators self radicalized themselves, and attempted to and successfully radicalized others. This was accomplished in part through the use of the internet and the translation and distribution of radical jihadi texts, as well as the speeches and teaching and discussions of the exploits of leaders of al Qa'ida and other "martyrs." Many in their target audience (Maldonado is but one example) are not fluent enough in the original language of some of these materials (e.g., *39 Ways*), that is, Arabic, and translating these into English and distributing them over the internet, make them more widely available to inspire and

⁷⁷This should not be taken as a suggestion that there is anything wrong with using cooperating witnesses and undercover agents pro-actively in the midst of an ongoing conspiracy.

radicalize others. As stated above, this is an important component of the worldwide terrorist conspiracy.

Based on all that is set forth above, the disrespect for the Court that the Defendant demonstrated at his initial appearance was likely based on his feelings towards kuffars (and uluj) and the government, our values and the source of the authority of the Court (or of any court), and not based on anger at the charges or some other reason.

From all of his statements discussed above, there is no reason that this Court should have any confidence that MEHANNA will comply with any conditions of release or in any way feel obligated to follow the instructions issued by the authority of the kuffar laws and Constitution he so despises.⁷⁸

There can be no stronger evidence of the defendant's character than his reaction to the horrific video of the mutilation of the bodies of American servicemen ("Who cares [about any court action] ... I want ... more BBQ sauce videos.")

The danger he poses is not limited to the commission of crimes of violence (whether here or abroad) against Americans and American interests. The weapons he used included a keyboard and computer. After their initial frustration over the failure of ABOUSAMRA to find a training camp in Pakistan, MEHANNA and his

⁷⁸In the words of his friend M, quoted above: "their filthy constitution ... their accursed "bill of rights."

coconspirators contemplated acts of terror against innocent civilians and public officials in the United States. After their frustration in Yemen (and ABOUSAMRA's experience in Iraq), MEHANNA continued to provide support to al Qa'ida and other terrorist organizations from the comfort of his parents' home in Sudbury. There are no conditions that this Court can formulate that would prevent MEHANNA from continuing these effort.

While defense counsel may suggest that his parents can be tasked with assuring that he has no access to a computer, that would be ineffective and inappropriate. First, with all due respect to the defendant's parents, for nearly the last decade, while aware of his radical beliefs (which, it appears, they do not share) and advocacy⁷⁹, they failed to control his actions or influence his beliefs.⁸⁰ Second, the only way to insure that he does not have access to computers and the internet, and to otherwise protect the public, is to give that task to those whose role it is to do this, that is, the U.S. Marshals Service and the Bureau of Prisons. See United States v. Tortora, 922 F.2d 880,

⁷⁹On June 22, 2006, MEHANNA told DS that, based on what MEHANNA had said at the Sharon mosque, someone came to his father and told the elder MEHANNA: "if we didn't know he was ur son ... we would say that he was a member of al-Qaida." MEHANNA told DS that, as a result, "I can't speak anymore ... and I have to pack up all my books."

⁸⁰Also, see above, MEHANNA, when referring to Usama bin Laden stated: "I realized ... that I look to him ... as being my real father."

887 (1st Cir. 1990) ("Given the breadth of human imagination, it will always be possible to envision some set of release conditions which might reasonably assure the safety of the community. ... But the Bail Reform Act, as we read it, does not require release of a dangerous defendant if the only combination of conditions that would reasonably assure societal safety consists of heroic measures beyond those which can fairly be said to have been within Congress' contemplation.")

When charged with a violation of 18 U.S.C. §1001, the Defendant MEHANNA faced the possibility of 8 years' imprisonment. He now faces the possibility of life in prison. A preliminary calculation of the advisory sentencing range suggests a sentence of 235 to 293 months or 324 to 405, depending on how the offenses are grouped. In either case, a sentence of between approximately 20 years and 34 years creates overwhelming pressure to flee, particularly when the Defendant already expressed a desire to leave the United States permanently (and assist its enemies). Only detention will prevent MEHANNA from fleeing. Now that he faces a terrorism charge, the risk of conviction and the penalty he faces, in light of the strength of the evidence against him, makes flight the natural and logical choice, especially for someone whose desire, even prior to his arrest, was to live overseas, that is, flee the land of the kuffars and infidels.

VI. Conclusion

Wherefore, because there are no conditions or combination of conditions that will reasonably assure the appearance of the defendant or the safety of the community, the defendant TAREK MEHANNA should be detained pending trial.

Respectfully submitted,
MICHAEL K. LOUCKS
Acting United States Attorney

By: /s/ Jeffrey Auerhahn
JEFFREY AUERHAHN and
ALOKE CHAKRAVARTY
Assistant U.S. Attorneys

Certificate of Service

I do hereby certify that a copy of the foregoing response was served upon the counsel of record for the defendants by electronic notice on this 5th day of November, 2009.

/s/ Jeffrey Auerhahn
Jeffrey Auerhahn
Assistant U.S. Attorney

AFFIDAVIT OF ANDREW NAMBU

I, Andrew Nambu, a Special Agent of the Federal Bureau of Investigation ("FBI"), in Boston, Massachusetts, being duly sworn, depose and state:

1. I am employed by the FBI as a Special Agent and am assigned to the Joint Terrorism Task Force ("JTTF"). I have been a Special Agent of the FBI for over ten years. I have been assigned to the JTTF for over seven years. In my current assignment, I am involved in investigations and prosecutions of terrorism and terrorism offenses.

2. The information contained in this affidavit is based upon interviews of witnesses, review of witness statements or reports of others who conducted interviews, my conversations with fellow members of the JTTF who have personal knowledge, my review of recorded conversations and documents related to this investigation, as well as personal observations or reports of the observations of other agents, and inferences I have drawn from this information. It does not, however, include all the information known to me with respect to this investigation, but only that information which is necessary to establish the requisite probable cause. In addition, it does not contain classified national security information.

3. I am submitting this affidavit in support of pre-trial detention of TAREK MEHANNA ("MEHANNA"), who is currently charged

with conspiring with AHMED ABOUSAMRA ("ABOUSAMRA") and others to provide material support to terrorists in violation of Title 18, United States Code, Section 2339A. There are no conditions or combination of conditions that would reasonably assure the appearance of the defendant or the safety of the community.

FACTS

4. Some of the information set forth herein comes from two cooperating witnesses ("CW1" and "CW2"). Both CWs provided information that was based on personal knowledge, including actions and statements by MEHANNA and ABOUSAMRA. Both CWs are prepared to testify at any trials. In addition, as set forth below, both CWs provided corroborative evidence in the form of consensually recorded conversations with MEHANNA, ABOUSAMRA and others. Further evidence is provided by Daniel Maldonado, who was a friend of MEHANNA and ABOUSAMRA, and is currently serving a 10 year prison sentence for Receiving Military-type Training from a Foreign Terrorist Organization (to wit: Al Qa'ida), in violation of Title 18, United States Code, Section 2339D(a).

5. Additional information was obtained from a review of records of governmental agencies, such as Customs and Border Protection ("CBP") and the Department of State, Passport Office, as well as records of private entities, such as banks, airlines, telephone companies and internet service providers, and

interviews of friends, relatives and acquaintances of MEHANNA and ABOUSAMRA. Finally, a number of recorded conversations involving MEHANNA and ABOUSAMRA provide further evidence.

Interviews of MEHANNA and ABOUSAMRA and False Information they Provided

6. On December 16, 2006, TAREK MEHANNA was interviewed by two members of the JTTF. Much of the interview concerned a trip by MEHANNA and two other individuals to Yemen in 2004. (Further information about said trip is discussed below.) Although not charged herein, MEHANNA provided false information and made fraudulent and fictitious statements about the purpose of that trip.

7. In addition, MEHANNA was asked about Daniel Maldonado. (See discussion below.) He also provided false information about his knowledge of Maldonado's circumstances at the time of the interview. MEHANNA identified a photograph of MALDONADO and acknowledged that they had known each other since about 2002 or 2003. MEHANNA stated that he last heard that MALDONADO was in Egypt. MEHANNA further stated that he last saw MALDONADO in August 2006, when MEHANNA briefly visited Egypt. At the time, MEHANNA said, MALDONADO was working for a website. MEHANNA further told the members of the JTTF that he rarely was in contact with MALDONADO, by either telephone or e-mail, and had last heard from him approximately two weeks earlier. At that

time, MEHANNA said, they spoke by telephone and MALDONADO stated that he was doing fine. According to MEHANNA, MALDONADO was then living in a suburb of Alexandria, Egypt.

8. As set forth below, admissions by MEHANNA to two cooperating witnesses, as well as statements by Maldonado establish that MEHANNA lied to the FBI concerning where Maldonado was living at the time and what he was doing. Just a few days earlier, MEHANNA received a telephone call from Maldonado, who was then in Somalia. MEHANNA knew that Maldonado had left Egypt and gone to Somalia where he received military-type training, and was training for jihad.¹ Further, during the telephone conversation, Maldonado (using coded language) told MEHANNA that he was involved in fighting.

¹*Jihad* is an Islamic term, literally means *struggle* in the way of God. Within Islamic jurisprudence, jihad usually refers to military action against non-Muslim combatants. In broader usage and interpretation, the term has accrued both violent and non-violent meanings. It can refer to striving to live a moral and virtuous life, to spreading and defending Islam, and to fighting injustice and oppression, among other usages. Jihad is also used in the meaning of struggle for or defense of Islam. Modern Muslims have tried to re-interpret the Islamic sources, stressing that Jihad is essentially defensive warfare aimed at protecting Muslims and Islam. Jihad has also been applied to offensive, aggressive warfare, as exemplified by early movements, as well as contemporary Jihad organizations, such as Al Qa'ida, that have been involved in assassinations and other terrorist acts. When used in this Affidavit, the term applies to offensive acts of violence by groups such as Al Qa'ida against military and civilian targets.

9. In recorded conversations, MEHANNA admitted to other individuals that he lied to the FBI, that is, that he knew Maldonado was in Somalia, and that Maldonado was training and fighting. MEHANNA expressed concern about being caught in these lies by the FBI.

10. In November 2008, MEHANNA was charged in a complaint with violation of Title 18, United States Code, Section 1001, for these lies concerning Maldonado to members of the JTTF. On January 15, 2009, MEHANNA was indicted for the same offense. Criminal Number 09-10017-GAO.

11. On December 12, 2006, ABOUSAMRA was interviewed by members of the JTTF. He too provided false information and made fictitious and fraudulent statements to the FBI, when he told the members of the JTTF that he went to Yemen in 2004 to study Arabic language and religious studies.

12. Both MEHANNA and ABOUSAMRA lied to the FBI. As is discussed below, the purpose of their trip to Yemen in February 2004 was to find a terrorist training camp² to learn how to conduct, and to subsequently engage in, jihad.

Information from Records, Documents and Witnesses

²Al Qa'ida and other terrorist groups established camps where individuals were trained in the use of weapons and explosives, to be used in future attacks.

13. According to CBP records, ABOUSAMRA took two trips to Pakistan in 2002, on or about April 4, 2002 and on or about November 17, 2002. The purpose of these trips, which was to obtain training in furtherance of jihad, is discussed below. In April 2002, ABOUSAMRA flew from New York's JFK Airport to Islamabad, Pakistan. Records received from Pakistan International Airlines indicate that he returned to the United States in May 2002.

14. Records received from Verizon establish that in May through August 2002 ABOUSAMRA called Pakistani telephone numbers. One of the numbers also appears on the records of Pakistan International Airlines as a local contact number ABOUSAMRA gave to Pakistan International Airlines in late April 2002. ABOUSAMRA also gave the name "Abdul Majid" as the name of the person associated with that number.³

15. According to CBP records, on or about November 17, 2002, ABOUSAMRA again flew to Islamabad, Pakistan from New York's JFK Airport. He returned in or about December, 2002.

16. In early 2004, MEHANNA, ABOUSAMRA and CW2, continued in their efforts to train for jihad, by traveling to Yemen in an effort to receive training at a terrorist training camp. As

³ CW2, who is discussed below, stated that, while in Pakistan, ABOUSAMRA met a man named "Abdulmajid," who helped ABOUSAMRA in his attempts to find and join terrorist camps in Pakistan.

discussed below, ABOUSAMRA, MEHANNA and CW2 received information and assistance from an individual who I will refer to as Individual A⁴, about who to see and where to go to find terrorist training camps in Yemen. Individual A then lived in California. Records obtained and reviewed establish that ABOUSAMRA flew to California in October 2003. Toll records establish telephonic contact with Individual A in California through February 1, 2004.

17. Travel records establish that on February 1, 2004, ABOUSAMRA, MEHANNA and CW2 left Boston's Logan Airport to fly to the United Arab Emirates ("UAE") through London. As they left, the three carried a combined amount of approximately \$13,000. They told CBP that they were going to Yemen to visit religious schools. They arrived in the UAE on or about February 3, and ABOUSAMRA and MEHANNA continued to Yemen on or about February 4. They returned to the UAE from Yemen on or about February 11, 2004. ABOUSAMRA continued to Jordan on or about February 12, and stayed overnight. On or about February 13, 2004, ABOUSAMRA entered Iraq. It is not known when he left Iraq, although it is believed that he was there for approximately 15 days. He was in Jordan from about February 28 through on or about April 18, 2004, when he entered Syria from Jordan. He returned to Boston from Syria in August 2004.

⁴Individual A's true identity is known to me.

18. Upon his return in August 2004, ABOUSAMRA told CBP that he had been in Yemen, Syria and Jordan. He did not mention his trip to Iraq (and apparently the Iraqi stamp in his passport was not detected during inspection). In his Customs declaration form, ABOUSAMRA omitted Yemen, Jordan and Iraq.

19. Over the next few years, ABOUSAMRA visited Syria multiple times. When he returned from one such visit in September 2006, a CBP officer noticed the stamps in his passport from Yemen and Iraq. ABOUSAMRA then admitted to the CBP officer that he had been in Iraq in 2004.

20. On December 12, 2006, ABOUSAMRA was interviewed by members of the JTTF. He too provided false information and made fictitious and fraudulent statements to the FBI, when he told the members of the JTTF that he went to Yemen after his divorce to go to school⁵. He claimed that from Yemen he went to Jordan to look for colleges. Finally, ABOUSAMRA stated that he went to Iraq to look for a job.

21. Two weeks after the JTTF interview, on December 26, 2006, ABOUSAMRA left Boston's Logan Airport to fly to Syria. He told CBP Officers that he was going to Syria to visit his wife.

⁵That statement would be true if when he said "school" he communicated that he was looking for a place where one could be trained to engage in violent jihad.

He was scheduled to return on January 20, 2007, but has still not returned.

Daniel Maldonado

22. Daniel Maldonado was born in Massachusetts in December 1978. He resided in New England (Massachusetts and New Hampshire) until he moved to Houston, Texas in 2005.

23. In November 2005, Maldonado traveled to Egypt and in November 2006, he moved to Somalia with his wife and three children. In June 2006, the Islamic Courts Union ("ICU") took control of Mogadishu, the capital of Somalia. The ICU intended to rule Somalia under "sharia," or Islamic law.

24. In or about early January 2007, Maldonado fled to Kenya in the face of attacks by Ethiopian forces, and was captured by the Kenyan military.

25. After his capture in January 2007, Maldonado made several statements to agents of the FBI. He admitted that he went to Somalia to fight jihad and live in an Islamic state. He stated that he received training in the use of weapons and explosives.

26. Maldonado also admitted that, while in the southern part of Somalia, he (Maldonado) called TAREK MEHANNA and, using code, urged MEHANNA to join him in fighting.

Information provided by Maldonado

27. After his capture, Maldonado was questioned by Special Agents of the FBI from the Houston, Texas Office. He was subsequently charged in the Southern District of Texas, and, after being returned to that District for prosecution, pleaded guilty to a one count Information alleging that he received military-type training from a foreign terrorist organization, to wit: Al Qa'ida, in violation of Title 18, United States Code, Section 2339D(a). He was sentenced to 10 years imprisonment.

28. Maldonado stated that he first met ABOUSAMRA in the summer or fall of 2002. ABOUSAMRA and Maldonado often discussed Islamic jurisprudence. Maldonado met MEHANNA through ABOUSAMRA. On the first day he met MEHANNA at MEHANNA's home, they watched a jihadi videotape⁶ in MEHANNA's living room. According to Maldonado, the video began by showing the pillaging of the Muslim world in Bosnia and Palestine. It then progressed to showing some of the uplifting victories of the mujahideen⁷. The video included footage of people being killed. After the video was

⁶So called "jihadist videos" take a number of different forms, showing, for example: the execution of captured prisoners by jihadi fighters; explosions of IEDs (improvised explosive devices) and other roadside bombs; training of jihadi soldiers; "inspirational" speeches of Usama Bin Laden and other Al Qa'ida leaders; and military actions in different areas of the world, including Chechnya, Afghanistan; etc.

⁷ Mujahideen is Arabic and literally means "strugglers;" it is a term for Muslims fighting in a war or involved in any other struggle. Mujahid, and its plural, mujahideen, come from the same Arabic root as *jihad* ("struggle").

over, the group, that included MEHANNA, ABOUSAMRA and Maldonado, talked about the glory of dying for the sake of Allah. On a different occasion, ABOUSAMRA and Maldonado watched a jihadi video on ABOUSAMRA's computer.

29. Maldonado, MEHANNA, ABOUSAMRA and CW2 would talk about fighting jihad, and how wonderful it would be to die on the battlefield. All of them wanted to participate in jihad eventually, and discussed the possibility of fighting in Chechnya and Iraq. ABOUSAMRA and Maldonado talked about going to Afghanistan, but agreed that, after September 11, 2001⁸, getting into Afghanistan through Pakistan was impossible. ABOUSAMRA and Maldonado discussed the religious justification for suicide bombings. ABOUSAMRA and MEHANNA often debated the legality of suicide bombings that resulted in the death of innocent civilians. Ultimately, they agreed that it was permissible if the benefit was greater than the loss. ABOUSAMRA, MEHANNA and Maldonado all approved of the attacks of September 11, 2001. They were happy when they heard about American deaths in Iraq.

30. MEHANNA, ABOUSAMRA and CW2 believed that Maldonado had contacts within the gang community before he converted to Islam, and that he may have been able to obtain weapons. On occasion,

⁸On September 11, 2001, Al Qa'ida orchestrated the attack on and destruction of the World Trade Center in New York and an attack on the Pentagon, using hijacked airplanes. A fourth hijacked plane that targeted Washington, D.C., crashed in Pennsylvania.

when they came to visit him at his home in New Hampshire, they asked to see his guns. On one occasion, CW2 asked Maldonado if he could get more weapons.

31. After they had been friends for about a year [in 2004], ABOUSAMRA confided in Maldonado that he (ABOUSAMRA) was leaving. Although ABOUSAMRA was vague concerning his intentions, Maldonado interpreted ABOUSAMRA's statements to mean he was leaving to participate in jihad. ABOUSAMRA told Maldonado they would not see each other again. Maldonado later learned that MEHANNA went as well.⁹ The two men traveled to Yemen. ABOUSAMRA gave Maldonado the impression that he went to Iraq, as well.

32. In the summer of 2005 Maldonado moved to Houston in connection with a job. In the fall of 2005, he moved to Egypt. In the summer of 2006, MEHANNA visited Egypt and met with Maldonado on several occasions. Maldonado discussed with MEHANNA Maldonado's desire to go to Somalia.

33. After he went to Somalia, in early December 2006, Maldonado called MEHANNA. Maldonado told MEHANNA that he was participating in "culinary school" and making "peanut butter and jelly." "Peanut butter and jelly" was a code that he and MEHANNA had created to refer to jihad when talking over the telephone or the internet. The phrase "culinary school" was made up by

⁹Maldonado did not know that CW2 also left the United States with the intention of going with his two friends to Yemen to train.

Maldonado on the spot; he assumed that MEHANNA would understand that he was receiving jihad training. (As set forth below, MEHANNA admitted to CW2 that he understood that Maldonado meant he was involved in fighting.) Maldonado provided to MEHANNA detailed instructions on how to get to Somalia to join him. He also urged MEHANNA to tell others in their group about the opportunities in Somalia.

Information Provided by CW2

34. CW2 was a coconspirator of ABOUSAMRA and MEHANNA. In 2006, he began to cooperate with the JTTF.

35. CW2 has known TAREK MEHANNA for approximately 15-20 years. MEHANNA introduced CW2 to ABOUSAMRA and the three men became close friends in approximately 2000 or 2001. The three men found common interest with each other and with others in discussing religious topics and the role of Muslims in the United States. They also discussed the justification for certain jihadist acts. ABOUSAMRA always justified their extremist views by citing Islamic teachings. On some occasions, when the three men engaged in serious conversations about jihad, only the three would be involved. They did not trust some of their other friends with certain information.

36. Prior to September 11, 2001, MEHANNA, ABOUSAMRA and CW2 talked about going to terrorist training camps in Pakistan. They

conducted logistical research on the internet pertaining to terrorist training camp locations and how to travel there, but no concrete plans materialized.

37. In 2002, CW2 returned to the United States after living for some time in Jordan.

38. After the attacks of September 11, 2001, ABOUSAMRA, MEHANNA and CW2 expressed support for the attacks.

39. According to CW2, in late 2002 or early 2003, ABOUSAMRA traveled to Pakistan to find a jihadist training camp. CW2 stated that ABOUSAMRA may have traveled to Pakistan twice for this purpose.¹⁰ Before one of ABOUSAMRA's trips, CW2 gave ABOUSAMRA a few hundred dollars to give to a jihadist group in support of the mujahideen.

40. After his return from Pakistan, ABOUSAMRA described to CW2 some of his experiences there. ABOUSAMRA told CW2 that he befriended a man named Abdulmajid¹¹, who he met on a bus after they discussed a jihadist slogan on a sign in Arabic. ABOUSAMRA stayed with the man in Pakistan, and Abdulmajid helped ABOUSAMRA in his attempts to find and join terrorist camps. ABOUSAMRA made contact with terrorist groups, including Lashkar e Tayyiba

¹⁰See above: records establish that ABOUSAMRA went to Pakistan twice in 2002.

¹¹Abdul Majid was the name and local contact information ABOUSAMRA gave to Pakistan International Airlines during his first trip to Pakistan in April 2002.

("LeT")¹² and the Taliban¹³. However, because ABOUSAMRA was an Arab (not Pakistani) the LeT camp would not accept him, and because of ABOUSAMRA's lack of experience, the Taliban camp would not accept him.

41. After his return to the United States, ABOUSAMRA had telephonic contact with Abdulmajid. For several months after his return, ABOUSAMRA continued in his efforts to maintain contact with Abdulmajid, who was supposed to help ABOUSAMRA find a terrorist training camp that would accept him.

42. During ABOUSAMRA's, MEHANNA's and CW2's regular meetings, they would watch jihadi videos that primarily belonged to MEHANNA. The videos were both VHS, as well as files downloaded from the internet. They occasionally watched these videos with others. The men discussed their desire to take some kind of action in furtherance of jihad, but did not know how to accomplish this objective.

43. Based on ABOUSAMRA's experiences in Pakistan, they came to believe that Pakistan might not be a feasible destination to receive terrorist training. In part, out of this frustration,

¹² The LeT is a Pakistan based foreign terrorist organization, and has been designated as such by the United States State Department.

¹³Taliban is the fundamentalist movement in Afghanistan that controlled most of the country from September 1996 to November 2001 and continues to presently attack coalition forces in Afghanistan.

ABOUSAMRA, MEHANNA and CW2 began exploring other options, including committing terrorist acts in the United States. For example, in 2003, ABOUSAMRA, MEHANNA and CW2 discussed the feasibility of shooting and killing a specific member of the executive branch of the United States government. In another conversation around the same time, ABOUSAMRA and CW2 discussed targeting a second member of the executive branch of the U.S. government.

44. While some of these plans involved no more than one or more conversations, at least one involved multiple conversations, discussions, and preparations. For example, in the latter half of 2003, ABOUSAMRA, MEHANNA and CW2 discussed a plan to obtain automatic weapons, go to a shopping mall, and randomly shoot people. They were inspired by the success of the Washington, D.C. area snipers who were successful in terrorizing the public.¹⁴ ABOUSAMRA justified attacks on civilians, such as the September 11, 2001 attacks. ABOUSAMRA stated that civilians were not innocent because they paid taxes to support the government, and because they were Kufar (non-believers).

¹⁴In the fall of 2002, there were a series of sniper shootings in the area of Washington, D.C. (Maryland and Northern Virginia), that received a great deal of media attention and "terrorized" residents of those areas because of the apparent randomness of the attacks. Ultimately two men, John Allen Muhammad and Lee Boyd Malvo, were arrested and convicted of some of the shootings.

45. The three men discussed logistics of a mall attack, including the types of weapons needed, the number of people who would be involved, and how to coordinate the attack from different entrances. They considered the emergency responses and the attack of those responders.

46. In furtherance of the plan, CW2 traveled to New Hampshire to meet with Daniel Maldonado, in an attempt to acquire the necessary weapons. According to CW2, Maldonado was a convert to Islam who, prior to his conversion, had contacts with gang members. Therefore, CW2 believed that Maldonado would have access to the weapons they needed. According to CW2, Maldonado told CW2 that he would be able to obtain handguns, but would be unable to obtain automatic weapons. CW2 told Maldonado not to ask the reason he needed the weapons. CW2 described Maldonado as someone with extreme beliefs, like ABOUSAMRA and MEHANNA.

47. After returning to Massachusetts, CW2 told ABOUSAMRA and MEHANNA that Maldonado would only be able to provide handguns. Because of the logistical problems of successfully executing the operation with just handguns, the plan was abandoned.

48. In 2003, ABOUSAMRA, MEHANNA and CW2 began to plan a trip to Yemen to attend a jihadist training camp. Prior to deciding on Yemen, they discussed the possibility of attending a

training camp in Southern Jordan. They also discussed going to Iraq to fight jihad. They researched various ways to enter Iraq through neighboring countries. They decided that the easiest way would be through Jordan, because of the ease in gaining travel documents. Iraq was of particular interest to them because they would have the opportunity to fight Americans, and because it was logistically easier to get to Iraq than to anywhere else where jihad was being waged.

49. In approximately 2003, ABOUSAMRA met an individual I refer to as Individual A on an online message board. CW2 described Individual A as a white convert to Islam, who worked as a teacher in an Islamic School in California. Individual A had received religious training in Yemen, and had also attended a terrorist training camp. According to CW2, Individual A also planned to take a trip to Yemen during the same time frame.¹⁵

50. ABOUSAMRA, MEHANNA and CW2 anticipated receiving assistance from Individual A concerning where to go and who to see in Yemen. Because they didn't feel safe discussing these matters on a message board or online, ABOUSAMRA flew to California to meet with Individual A. Individual A provided to ABOUSAMRA the name of a town in Yemen and the name of a person

¹⁵The true identity of Individual A is known to me. Individual A lived in Pakistan in 1996 and attended an LeT training camp. He again traveled to Pakistan in 1997 and to Yemen in 1998. He again traveled to the Middle East in 2004.

who would be able to get them into a camp. ABOUSAMRA, MEHANNA and CW2 had additional questions about the information from Individual A, so CW2 believed ABOUSAMRA may have taken a second trip to California to meet with Individual A. Individual A also gave them details, for example, on what to bring.

51. CW2 paid for all three tickets for CW2, MEHANNA and ABOUSAMRA to fly to Yemen. Prior to leaving, they pooled their resources and divided the cash three ways, in order to avoid scrutiny at the airport, and so that no currency report would have to be filed. They also discussed a cover story to tell law enforcement, in case they were questioned. ABOUSAMRA did research online and found the name of a school, Dar al Mustafa, that they would say was where they intended to study religious studies. They never made any contact with the school and had no intention of attending.

52. Before leaving, CW2 recorded a video that would explain to his family what he had done. He hid the video and planned to email his family to tell them where they could find it. Based upon these facts, it is apparent he did not expect to return.

53. ABOUSAMRA, MEHANNA and CW2 intended to receive the training necessary to participate in jihad. Their intention was to fight jihad after completing training. They were willing to fight anywhere they would be accepted by groups who were engaging

in jihad, for example, Iraq or Somalia, but their desire was to be able to fight in Iraq against America.

54. ABOUSAMRA expressed his belief that suicide bombings were permissible. CW2 disagreed. CW2 and MEHANNA wanted to be soldiers for jihad and, while not suicide bombers, all three wanted to participate in killing U.S. soldiers and others abroad. ABOUSAMRA found justification for his position in the religious writings of Muslim extremists.

55. Prior to leaving, ABOUSAMRA and CW2 trimmed their beards to appear less visibly Muslim. They also hiked to physically prepare. ABOUSAMRA, MEHANNA and CW2 also prepared by watching jihadi videos, including some from the Chechnyan jihad¹⁶. Occasionally they watched these videos with others, but ABOUSAMRA, MEHANNA and CW2 did not tell others of their plans to travel to Yemen, be trained, and then engage in jihad.

56. ABOUSAMRA, MEHANNA and CW2 flew from the United States to the United Arab Emirates ("UAE"). Upon arrival, they checked their e-mails and CW2 received an e-mail from his family urging him to return. CW2 felt relieved that he had an excuse to back out, and told ABOUSAMRA and MEHANNA that he would not continue with them to Yemen. The next day, ABOUSAMRA and MEHANNA

¹⁶Many Islamic fundamentalists who have a history of international terrorism became involved in the Chechen conflict. Arab fighters joined the fight of Muslims in Chechnya seeking to gain independence from the Russian Federation.

continued on to Yemen without CW2. Prior to their separation, CW2 gave ABOUSAMRA and MEHANNA some of the money he had, and ABOUSAMRA and CW2 switched backpacks because CW2's was better for the trip. CW2 returned to the United States. He did not expect to see ABOUSAMRA or MEHANNA again.

57. A few weeks later, CW2 was surprised to see MEHANNA at a party. MEHANNA returned to CW2 the money CW2 had given him. MEHANNA told CW2 that nothing happened in Yemen.

58. Sometime later, ABOUSAMRA also returned. ABOUSAMRA told CW2 that he went to Iraq. He told CW2 that, while in Iraq, he met a group of men who were involved in attacks; however, he claimed, they would not allow ABOUSAMRA to participate because ABOUSAMRA was an American.

59. Since shortly after their return from Yemen, CW2 has made a conscious effort to avoid any contact with MEHANNA and ABOUSAMRA, and had very little contact with them.

60. Sometime in the middle of 2006, CW2 received an e-mail from MEHANNA in which MEHANNA described Muslims living in America as "house slaves."

61. In December 2006, ABOUSAMRA and MEHANNA were interviewed by the FBI about their trip overseas in 2004. This gave an opportunity for CW2 to resume his relationship with ABOUSAMRA and MEHANNA. However, shortly after being interviewed

by the FBI concerning the Yemen trip, in late 2006, ABOUSAMRA left the United States and now lives with his wife in Syria.

Consensual Recordings of CW2

December 15, 2006: ABOUSAMRA

62. On December 15, 2006, CW2 recorded a conversation with ABOUSAMRA. By the time of the meeting, both men had been interviewed by the FBI concerning their trip to Yemen in 2004. The purpose of the meeting was for ABOUSAMRA to learn what the agents had said to CW2 and what CW2 had told them. CW2 expressed concern to ABOUSAMRA about what information the FBI had about the true purpose of their trip. CW2 therefore questioned ABOUSAMRA about who knew the true reason, and what they knew.

63. CW2 told ABOUSAMRA that the agents showed him a picture of Daniel Maldonado and asked CW2 if he knew Maldonado. CW2 told ABOUSAMRA that he admitted that he did and, when asked, told the agents that Maldonado went to Egypt. ABOUSAMRA scolded CW2 and told him "you didn't need to mention him, because there's no proof they have no proof that you knew he went to Egypt. What's the proof ... if you don't have to answer the question, just don't answer it."

64. CW2 also told ABOUSAMRA that he had been shown a photograph of someone he assumed was Individual A. CW2 described to ABOUSAMRA the photo he was shown as a "California DMV" photo

of a "white guy ... [with] a round face ... small glasses ... and like a beard." ABOUSAMRA speculated that one of the FBI's sources of information might be Individual A "if they arrested him." CW2 asked ABOUSAMRA "if they arrested him, what does he know about us?" ABOUSAMRA confirmed that only he visited Individual A¹⁷, and stated: "The only person who [he] would know would be me, and then they would just [be] associating you by association."

65. CW2 mentioned the names of other friends and asked what they knew. ABOUSAMRA re-assured CW2 that people knew but he did not tell anyone of their plans. Therefore, according to ABOUSAMRA, "it was just speculation;" he added, there's "no ... documented evidence."

January 12, 2007: MEHANNA

66. On January 12, 2007, CW2 recorded a conversation with TAREK MEHANNA. The conversation concerned MEHANNA's interview by JTTF members (which had occurred on December 16, 2006) and MEHANNA's trip to Yemen in 2004 with ABOUSAMRA.

67. MEHANNA told CW2 that he too was shown a photograph of an individual, who he assumed was Individual A.¹⁸

¹⁷ABOUSAMRA met with Individual A to get the information about where to go and who to contact in Yemen.

¹⁸Neither had ever met Individual A; only ABOUSAMRA flew to California to meet Individual A.

68. MEHANNA told CW2 that their trip to Yemen was a failure, in large part, because no one was around. Half the people they wanted to see were on hajj¹⁹, and half were in jail. They traveled all over the country looking for the people Individual A told them to meet.

69. One person they saw was an Egyptian who Individual A said they should visit. MEHANNA described to CW2 how they had someone drop them off at the man's house. They knocked on the door of what MEHANNA described as a mud hut, and a young boy answered. MEHANNA and ABOUSAMRA asked for the boy's father. The boy said that they hadn't seen him in three years, since September 11 [2001]. They decided to tell the boy the truth and told him exactly why they were there, [that is, to train for jihad]. He listened and then excused himself. He returned about 10 minutes later carrying an AK-47, with his father behind him. Another man walked in, who was huge, had long hair, a long beard and wore a turban. The father, referring to why they were in Yemen, told them "all that stuff is gone ever since the planes hit the Twin Towers."

70. CW2 expressed concern about who knew the real reason for their trip [to find a training camp]. MEHANNA tried to assure CW2 that although many people knew the real reason, no one

¹⁹The Hajj is Arabic, and refers to the Pilgrimage to Mecca in Islam.

was specifically told.

71. CW2 expressed his view that as American Muslims they are "handicapped;" one cannot go from being raised in America to being a member of the Taliban. CW2 and MEHANNA discussed the fact that ABOUSAMRA had traveled to many countries²⁰ in order to join the mujihadeen. The following exchange then occurred:

CW2: All those places and what did they [the mujihadeen] tell him?

MEHANNA: We don't need you.

72. CW2 expressed reservations about what they had done. MEHANNA disagreed and said the way they did it was wrong, but not the idea of it. They were hasty and immature, but not wrong. MEHANNA told CW2 that he did not regret it for one second; it was the best two weeks of his life.

73. MEHANNA confessed that once he finishes his degree, he is moving overseas.²¹

February 25, 2007: MEHANNA

74. On February 25, 2007, CW2 recorded a conversation with TAREK MEHANNA. This conversation occurred after reports had appeared in news media about the capture of Daniel Maldonado. In

²⁰At the time of this conversation, MEHANNA and CW2 knew ABOUSAMRA had traveled to a number of countries, including Pakistan, Yemen and Iraq, as part of his effort to join the mujihadeen.

²¹As discussed above, in November 2008, MEHANNA was arrested; the arrest took place as he was about to board a plane at Boston's Logan Airport, en route to a full time job in Saudi Arabia.

early February 2007, reports began to appear in newspapers concerning foreigners (including two Americans) arrested by Kenyan authorities at the Somali border. The reports said that foreigners had been fighting with Somalia's Islamic Courts movement. By mid-February, reports had identified one of the Americans as Daniel Maldonado. He was subsequently charged in federal court in Houston, Texas, with crimes arising from the training he received in Somalia from members of the terrorist organization Al Qa'ida.

75. During the conversation with CW2 on February 25, MEHANNA referred to a telephone conversation that was discussed in the media between MALDONADO and an unnamed individual. MEHANNA admitted that he was that unnamed person. CW2 and MEHANNA discussed reports that the authorities had corroborating information about the telephone call. They speculated as to who could be the corroborating witness, and identified another person, who they believed provided information to the FBI about the conversation between MALDONADO and MEHANNA [that occurred on December 12, 2006].

76. CW2 expressed concern and wanted to know what Maldonado could say about them. MEHANNA told CW2 there was nothing they could do, except have a "good answer" when they are again questioned by the FBI.

77. CW2 and MEHANNA talked about ABOUSAMRA, who had essentially "fled the country" after being questioned by the FBI.

78. MEHANNA repeatedly stated that he could not understand why Maldonado (as reported in the news) had confessed to details of his training while in Somalia. CW2 joked to MEHANNA about how they had once kidded each other that, if they were arrested, they would confess like Richard Reid²².

79. MEHANNA told CW2 that, during the telephone call that MEHANNA received from Maldonado while Maldonado was in Somalia, Maldonado told MEHANNA that he was not in the capital, but "on the beach." MEHANNA claimed that Maldonado had not said anything during the call that would have provided direct evidence that he was doing anything illegal. Maldonado was very "cryptic" and never said "I am fighting." CW2 asked MEHANNA about some of the coded words Maldonado used such as "culinary school" and "peanut butter and jelly," which was also referred to as "P, B & J." MEHANNA told CW2 that when Maldonado told MEHANNA that he was "making peanut butter and jelly sandwiches," MEHANNA warned

²²On December 22, 2001, Richard Reid, a citizen of Great Britain (who was a Muslim convert) was subdued by passengers and crew on board an American Airlines flight from Paris to Miami, as he attempted to ignite a bomb that was built into his shoe. He was indicted in this District and pleaded guilty. In December 2003, after being sentenced to life imprisonment, and as he was being led from the courtroom, Reid yelled at the sentencing judge (Young, D.J) that he was at war with this country and reasserted his allegiance to Al Qa'ida.

Maldonado that he shouldn't say things like that over the telephone. CW2 asked MEHANNA what the phrase meant; MEHANNA stated that, in general, it meant "I'm here fighting."

80. CW2 pressed MEHANNA on what Maldonado knew and what ABOUSAMRA might have told him. MEHANNA could not say specifically what he was told, but stated because "people are not freaking idiots," it is not necessary to "sit down and explain these things to people like Dan" (i.e., why they went to Yemen and why ABOUSAMRA went to Iraq). MEHANNA added, if you told Dan (Maldonado) "I was in Afghanistan" he wouldn't say "what were you doing there?" (I believe he meant that, without having to explicitly say so, Dan would obviously understand that the reason one of them would go to Afghanistan is to engage in jihad.)

81. MEHANNA admitted to CW2 that he hung out with Maldonado at least once a month before Maldonado moved to Houston. MEHANNA stated that he has also stayed in contact with ABOUSAMRA, since ABOUSAMRA left the United States.

82. CW2 also asked MEHANNA if his parents knew why he went to Yemen. MEHANNA told CW2 "they know I didn't go there to graze goats." MEHANNA opined that Daniel Maldonado and others know where they went and why, even if they were not specifically told. CW2 asked if ABOUSAMRA told his father, to which MEHANNA responded: "You don't tell your parents, 'I'm going to fight

jihad,' ... you just tell them 'I'm leaving.'" CW2 repeated his concern that ABOUSAMRA may have said to someone "I went to Yemen to go to a training camp." MEHANNA said that he did not believe ABOUSAMRA specifically said that to anyone. He would have told where they went and people made their own deductions.

83. MEHANNA told CW2 that he was concerned that he was caught in a lie by the FBI. He told CW2 that, when asked by the FBI about Maldonado, he said Maldonado was in Egypt. MEHANNA admitted that he told this to the FBI shortly after Maldonado had called him from Somalia. MEHANNA stated that lying to the FBI is a problem, and he wasn't sure how he was going to explain that.

84. MEHANNA told CW2 he should leave the United States as soon as he can. MEHANNA said that the only thing keeping him here is the need to finish his degree.

Information Provided by CW1

85. CW1 has been cooperating in this investigation for over two years. During that time he has provided information concerning TAREK MEHANNA and others, and has recorded a number of conversations.

86. CW1 has known TAREK MEHANNA for over 10 years. He knows ABOUSAMRA as well, but has had significantly less contact with him. In the two years prior to re-connecting with MEHANNA as part of this investigation, CW1 only saw MEHANNA sporadically.

For a couple of years (while CW1 cooperated in this investigation and recorded conversations with MEHANNA) they met regularly for study and discussions, as well as socially.

Consensual Recordings of CW1

February 27, 2007

87. On February 27, 2007, CW1 recorded a conversation with TAREK MEHANNA. The conversation occurred after the publicity surrounding the arrest of Daniel Maldonado (discussed above). MEHANNA asked CW1 if he had heard about Maldonado's arrest. CW1 stated that he read about it in the New York Times. MEHANNA asked if he read that Maldonado had admitted that he called someone in the United States in an effort to recruit that person. MEHANNA went on to explain that he (MEHANNA) was the person Maldonado called. MEHANNA also related that the newspapers reported that Maldonado had used "cryptic language" about "making peanut and jelly sandwiches."

88. MEHANNA explained that he had been in touch with Maldonado when he was in Egypt, before he went to Somalia.

89. CW1 told MEHANNA that he was thinking of traveling once he (CW1) got his passport back. (CW1 was then under travel restrictions in connection with a court case.) MEHANNA told CW1 that Somalia had been the easiest place to go, and advised CW1 he could fly straight to Dubai from the U.S. and from there to

Mogadishu²³ (the capital of Somalia).

90. CW1 told MEHANNA that he knew some "brothers" in Yemen, but communication was "sketchy." MEHANNA said to CW1, "there's nothing in Yemen ... I went to Yemen a couple of years ago ... anyone who has anything to do with anything is ... done." MEHANNA also stated, "After September 11 it completely changed." MEHANNA explained that there "used to be camps and stuff" but they are not there anymore. MEHANNA stated the people who used to run the camps are "fugitives" or "underground."

91. MEHANNA further explained to CW1 that "from what I've learned ... looking back from like Afghanistan, ... Somalia - the best time to do anything is in the beginning because that's when the borders are open...." According to MEHANNA, when the U.S. first invaded Afghanistan, one could fly to Pakistan and walk across the border, and that was what people were doing.

92. According to MEHANNA, it is "unfathomable" that the United States has military bases in the "heart of the Muslim world," and the "land of Mohammad ... is being used as a military base to attack Muslims."

93. MEHANNA told CW1 that, in the United States, he feels "like a fish out of water."

CONCLUSION

²³MEHANNA had received this information from Maldonado during the telephone call discussed above.

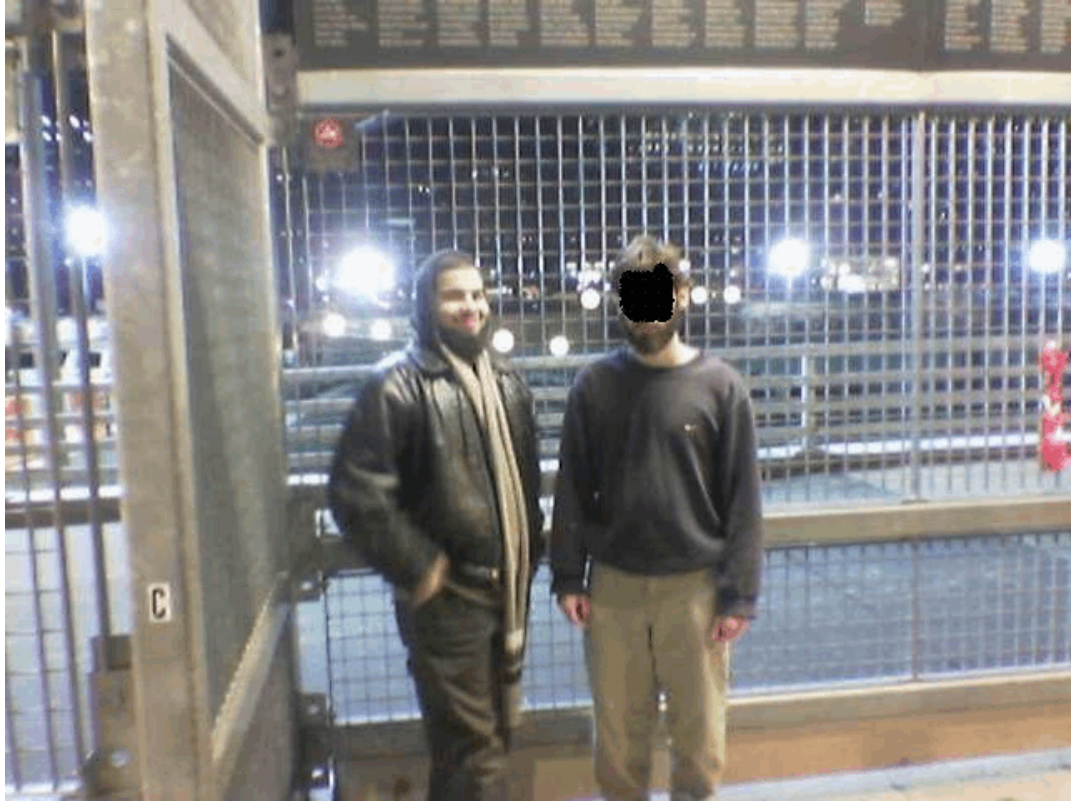
94. Based on the information set forth above, there is probable cause to believe that beginning in or about 2001, and continuing until in or about May 2008, in the District of Massachusetts and elsewhere, the defendant, TAREK MEHANNA, did knowingly and unlawfully combine, conspire and agree with AHMED ABOUSAMRA and others known and unknown to provide material support and resources, that is, property, services, currency and monetary instruments, training, expert advice and assistance, facilities and personnel, and to conceal and disguise the nature, location, source, and ownership of such material support and resources, knowing and intending that the material support and resources were to be used in preparation for and in carrying out violations of Title 18, United States Code, Section 956 (conspiracy to kill, kidnap, maim, or injure persons or damage property in a foreign country), and Section 2332 (extraterritorial homicide of a U.S. national), all in violation of Title 18, United States Code, Section 2339A.

95. Based on the information set forth herein and the Proffer and Memorandum of the Government in Support of Detention, I believe that the strength of the evidence and likelihood of conviction negate any reason to stay and fight the charges, and further establish that MEHANNA is a danger to the community if released. I therefore believe that there are no conditions or combination of conditions that could ensure the appearance of the

defendant at proceedings and trial, or the safety of the community.

Sworn to this ___ day of November 2009, under the pains and penalties of perjury, at Boston, Massachusetts.

Andrew Nambu
Special Agent
Federal Bureau of Investigation





Darul Ilm

"Make martyrdom what you seek"

Author

MWarrior

Message

Subject: "Make martyrdom what you seek" Sun Apr 27, 2008 8:13 pm

The bullets hit your hearts like the stings of a bee
You fall on your face as all you can see,

Are the Gardens so wide when you're put in the ground
You've been searching for years and now you have found,

The Ultimate Prize, so sacred, so sweet
Your bargain with your Lord is finally complete,

Because you are all martyrs without fear or grief
Who gave all you had for your precious belief,

You promised Him your souls and He promised you much more
Now you can enjoy what He's kept in store,

An endless reward for those who stood by
The covenant they made that towards death they would fly,

While graves burn the sinners and squeeze them so tight
You're shown your places in the Garden, so spacious and bright,

On the Day when Great Terror shall steal all their words
Your souls will rest in the hearts of green birds,

Under the Great Throne with beauty beyond measure
At you ar-Rahmaan laughs, expressing His Pleasure,

Sufficient is this as a heavenly prize
But prepared for you is that never before seen by the eyes,

On your head is placed a crown, one jewel of which is worth
More than all of the jewels contained in this Earth,

You are brought to a gathering with companions so beautiful
The Prophets, the righteous and those who were truthful,

Al-Firdaws, where those of the Right Hand shall meet
Where the soil is white musk, so smooth and so sweet,

You scoop up a handful and throw it in the air
You are relaxed by the rivers flowing everywhere,

Water, milk and honey gushing forth non-stop
So thick and delicious you want to devour each drop,

You drink so much you almost end up falling
Into the flowing current, then you hear voices calling,

You turn and behold! The voices are singing
Coming from Maidens so fair and enchanting,

These are the Hoorees with round and firm chests
Pure untouched virgins, they're better than the best,

Seventy-two in all, with large eyes of dark hue
Each one created especially for you,

They call out your name asking where you are
But to their disappointment, from the battles you are far,

Your heart is intoxicated by the pleasures of this life
Fear (of death) has wounded your manhood like a sharp knife,

A knife sharpened by the callers to Hell's every door
Who pulled the sword from your hand and threw it to the floor,

And given you women, children and money instead
Convincing you 'this is better than ending up dead,'

But no! They are alive, rejoicing and provided for!
When asked what they desire, they will answer no more!
So be from the cream of this heavenly crop!

Shake off your fear and let your doubts drop!
Pick up the sword and grab your horse's reins tight!
Throw off your armor and jump into the fight!

Make your path be none other than Islaam's high peak
Whose mountain is climbed by making death what you seek!

By my beloved friend Abu Sabaayaa. I love you.

Subject: Re: "Make martyrdom what you seek" Tue Apr 29, 2008 10:15 am


whoa, well written Masha'Allah.
was a pleasure to reading it.

Subject: Re: "Make martyrdom what you seek" Mon Aug 04, 2008 12:44 pm

Dawn

Ibn Khattab

OI MWARRIOR!!!!!!

Thats my poem man how could you hijack that from me 

Abu Sulayman

Subject: Re: "Make martyrdom what you seek" Mon Aug 04, 2008 2:37 pm

Quote:

Thats my poem man how could you hijack that from me

So you know Abu Sabaaya?

For Allah ('azza waja!) is above His Throne, above His Heavens: creation, so whoever doesn't know Him like this, then he does he worships (*ad-Darimi in 'ar-Rad alal-Jahmiyyah*).



Ibn Khattab

Subject: Re: "Make martyrdom what you seek" Mon Aug 04, 2008 3:58 pm

maybe 

Abu Sulayman

Subject: Re: "Make martyrdom what you seek" Mon Aug 04, 2008 4:02 pm


I see.

For Allah ('azza waja!) is above His Throne, above His Heavens: creation, so whoever doesn't know Him like this, then he does he worships (*ad-Darimi in 'ar-Rad alal-Jahmiyyah*).



Admin

Subject: Re: "Make martyrdom what you seek" Mon Apr 06, 2009 7:14 pm

I know abu sabaayaa 

"There is no worse calamity for knowledge and its people than They are ignorant, but presume to know. They cause trouble y helping." - Imam Ibn Hazm Rahimahullah

urban rose

Subject: Re: "Make martyrdom what you seek" Mon Apr 06, 2009 7:27 pm

the guy from Ummah? 🙄



Admin

Subject: Re: "Make martyrdom what you seek" Mon Apr 06, 2009 7:28 pm

He's not actually on ummah, that's like saying Abu Mus'ab from LI 😏

***"There is no worse calamity for knowledge and its people than they are ignorant, but presume to know. They cause trouble y helping."* - Imam Ibn Hazim Rahimahullah**

urban rose

Subject: Re: "Make martyrdom what you seek" Mon Apr 06, 2009 7:30 pm

you're not Abu Mus'ab on LI though 😏

there were a thread on Ummah about someone who was arrested or : America? is that the same guy?



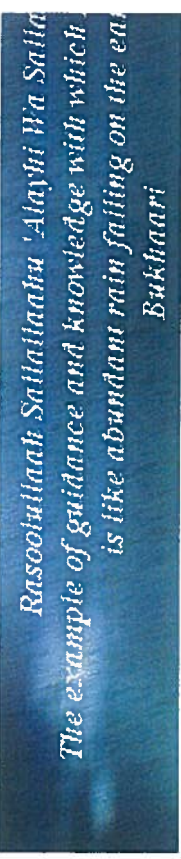
Admin

Subject: Re: "Make martyrdom what you seek" Mon Apr 06, 2009 7:32 pm

Says who? 🙄

the guy we're talking about is the one from iskandrani.wordpress.com


"There is no worse calamity for knowledge and its people than they are ignorant, but presume to know. They cause trouble y helping." - Imam Ibn Hazm Rahimahullah




urban rose

Subject: Re: "Make martyrdom what you seek" Mon Apr 06, 2009 7:35 pm

Admin wrote:

Says who? 

the guy we're talking about is the one from iskandrani.wordpress.com

youre Abu Musab 

yeah, ive seen that on his sig...



Admin

Subject: Re: "Make martyrdom what you seek" Mon Apr 06, 2009 7:44 pm

stalker 

"There is no worse calamity for knowledge and its people than they are ignorant, but presume to know. They cause trouble y helping." - Imam Ibn Hazm Rahimahullah



Aveiled

Subject: Re: "Make martyrdom what you seek" Mon Aug 10, 2009 9:43 am

mashaalah, cool poem

Suraqah al-Andalusi

Subject: Re: "Make martyrdom what you seek" Tue Aug 18, 2009 4:30 pm

Beautiful poem mashAllah!

<http://www.anwar-alawlaki.com/>

"Make martyrdom what you seek"

Free forum | phpBB | Free forum support | Contact | Report an abuse | Free messag

Date of recording: 12/12/2006
Telephone#: 978-760-0658
Language: English/Arabic

Participants:

Tarek Mehanna TM
Daniel Maldonado DM

Abbreviations:

IA Inaudible
UI Unintelligible
[...] Translator's Notes
OV Overlapping voices
[sic] its in the original incorrect form
Italics Arabic

TM: Hello!

DM: *Peace be upon you.*

TM: *Peace and Mercy of Allah be upon you-* where the heck are you Du--? [OV]

DM: *Brother, brother-* [OV]

TM: Actually- Actually- I know-

DM: [OV] Where I am-

TM: - actually I know where exactly where you are, cause of the area code.
What's going on man?

DM: You do?

TM: Yeah.

DM: Do you know where I'm really?

TM: I looked it up on the inter-- [OV]

DM: [UI] I told you.

TM: Yeah, I know. I looked it up on the internet. [OV]

DM: [UI]

TM: Praise to Allah. [OV]

DM: But, I told you already.

TM: Yeah I know. [OV]

DM: *Brother*, I want to let you know something.

TM: Yes, please, let me know.

DM: Come. Come. Come. [OV]

TM: Okay.

DM: Immediately.

TM: [Sigh]

DM: But look, look. I'm not kidding *brother*. I am gonna *[sic]* give you an advice and I have to let you go real quick.

TM: Dude what – [OV]

DM: Come now.

TM: Yeah, I know.

DM: Come- come with Ahmad, come with Daniel, come with every body. Come now though, now.

TM: [OV] Can you- wait a second *brother*. I want you to tell me what happened in Egypt.

DM: [Short Pause] [OV]

TM: [OV] Because-

DM: I left. Oh that whole thing-

TM: - [OV] I mean in terms of me, because-

DM: [OV] [UI]

TM: When you- Dude, when you sent me that Email that was ridiculous. Because, first of all it-

DM: 'Abdallah [Short Pause] 'Abdallah forced me to write that Email, number one-

TM: *Brother*, that was very – [OV]

DM: [UI]

TM: Yeah, go on.

DM: I agree. I agree. But look, look. He forced me to write it and he told me that it's for the betterment of you. He didn't want- you know how 'Abdallah is. He said I am not gonna *[sic]* tell you why I want you to say these things. He said but just trust me Tarek could be in big trouble cause - he said somebody in the US let him know that your name was [IA] -

TM: That my name what?

DM: Your man-name was mentioned to somebody in like New Jersey or something.

TM: What?

DM: And this person said that you're of like major interest.

[Call ends abruptly]

Date of recording: 12/12/2006
Telephone number: 978-760-0658
Language: English/Arabic

Participants

Tarek Mehanna TM
Daniel Maldonado DM

Abbreviations:

<i>Italics</i>	Spoken in Arabic
[]	Translator's notes
PH	Phonetic
UI	Unintelligible
OV	Overlapping voices
Sic	Said incorrectly
[...]	Unfinished speech
-	Interruption

TM: *Peace be upon you, brother.*

DM: *Peace be upon you.* Sorry my phone card ran out.

TM: That's all right. So, you're living there now?

DM: *Brother*, I'm living here for life. Once you come here, there's no going back.

TM: Where are you, in the capital?

DM: [~~Sneeze~~]

TM: You're in the capital?

DM: Huh?

TM: You're in the capital?

DM: Uh [...], no.

TM: Is it easy to get there?[OV]

DM: [OV] No.

TM: Is it easy to get there?

DM: *Brother*, all you got to do is go to Dubai-

TM: Yeah, that's what I heard.

DM: -Go from Dubai, straight, straight to the capital. Bu [...] re [...] remember this, I'm going to tell you something and I don't care who's listening, because there is no way nothing illegal about it.

TM: Yeah.

DM: You know what I mean?
TM: Yeah.
DM: Uh, never, ever ever go from Dubai to Djibouti [PH].
TM: O.K.
DM: Never do that.
TM: Alright.
DM: Go straight from, uh, Dubai [pause] - What? Jubba Airlines. You have a pen?
TM: Yeah, hold on a second. [Pause] So, is Al-Mizzi[PH] with you?
DM: Yeap-
TM: Give, give him-
DM: Brother...
TM: - my sincere *regards*.
DM: He says, *brother*, he says, *peace be upon you*, his sincere *regards*.
Brother-
TM: Yeah.
DM: Are you there?
TM: I'm right here, man.
DM: *Brother*, I'm telling you, *brother*, this is the life man, there's no other life except for this.
TM: Is it- it's good though?
DM: It's 100. *Brother*, it's 100%. One hundred percent, *brother*. It's more than you even think it is.
TM: Dude, I just want to be somewhere where I can pray [laugh] five times a day in a *mosque*.
DM: *Brother*, oh, pray five times, pray five times a day, *brother*, do you know where I am? You can't even smoke cigarettes, it's illegal.
TM: Wow, *Glory be to Allah*. All right, what's- what's the details dude?
DM: O.k. Jubba airlines.
TM: Yeah, spell it.
DM: O.K. how's the spelling? J- [Background UI conversation] U-B-B-A.
TM: All right, what-what's the cost that I'm looking at here?
DM: What's the cost again Omar?
[Background Omar: "Uh"]-
DM: It's like...
[Background Omar: "It's around \$500"].

DM: \$500 from Dubai.

TM: And what city are you living in?

DM: Me? I, I'd rather not say over the ph- actually you know what, whatever, what are they going to do to me?

TM: Yeah, what the heck are you doing that's wrong?

DM: No, but check this out, yeah exactly, but I'm going to tell you something, don't even, yeah don't worry about that I'm being advised not to, but look, don't worry about that. *Brother*, check this out. Come here, you don't even have a dime in your pocket. I will set you up with everything.

TM: So what are you doing there?

DM: I'm talking about [...] Uh, [pause] well right now I'm in a culinary school and I just make peanut butter and jelly.

TM: Uh, right. *Whatever Allah wills*. Dude, what about like marriage and stuff?

DM: Marriage is so easy, *brother*. Stupid-

[Background conversation UI]

[Giggle]

[Background Omar:" Tell him not to make his flight]-

DM: Yeah, don't; don't make your flight until you get to Dubai. Cause, cause

TM: You mean don't-

DM: Once you get to Dubai-

TM: -Then arrange it from there?

DM: -Call. [Pause] Yeah, we're gonna also set you up with some people so you get- you got somewhat of a visa. There's really no such thing as a visa, but-sometimes you got to [OV]

TM: [OV] Wait, so when you get in, so when you get in you don't need anything, you don't need like a visa or anything?

DM: No, not really but Dubai is going to try to tell you that you do, but you don't. What we're going to do is to set you up with something.

[Background conversation with Omar]

TM: Before I get in or after?[OV]

DM: [OV] You don't have to-[Background conversation] O.k. we're gonna-we're gonna keep in touch with you, but what was that Omar?

[Background conversation] You're coming as a tourist, so bring tourist clothes and money to buy stuff. But, don't bring anything huge and don't bring anything too small.

TM: Dan.

DM: You're a tourist.

TM: Alright, but what I'm saying is before getting there do I need a visa?

DM: Does before getting here, does he need a visa? Cause remember my situation was different No, you don't.

TM: O.k.

DM: But we're going to set you up. We're going to set you up *Allah willing* with somebody in Dubai.

[Omar: Travels, everyone travels separately]

DM: And everyone if you're gonna go [sic], travel separately-

TM: All right, all right, don't talk as if it's like something like you know shady. [Laugh]

DM: No, no- What it-no what it is, what it is. *Brother, brother*, I'm... it's nothing shady, and it's nothing illegal, nobody would worry about it, but what it is, is people have the wrong ideas of people coming here, that's why..

TM: Yeah, I, I totally understand.

DM: Some people get the wrong message.

TM: Yeah.

DM: So just to avoid troubles, that's it.

TM: How long have you been there, dude?

DM: *Brother*, I've been here-How long have we been here, like two weeks? [Background UI conversation]

Like two weeks.

TM: Cause dude, Saz [PH], me and Saz have been like, we thought something happened to you [pause] in Egypt.

DM: No, but uh.

TM: Alright.

DM: Nothing happened to me, something great happened to me. What did you say Omar? [Background UI conversation]. He say [sic], he say [sic], he say [sic]he said that you should make your intention now, and know that you get your *compensation* even if you would die along the way.

TM: *Whatever Allah wills*. Alright, dude.

DM: *Brother*, remember we're, we... *brother*, we're people of the *hereafter*, we're not [...] this is what it's about, man.

TM: Yeah, but the main [OV]

DM: [OV/UI]

TM: the main obs [...] Dan, The main obstacle though is mommy and daddy, you know.

DM: *Brother*, seriously at this point you're living in a place where really it's not permissible for you to live, cause the hardships of your *prayer*, and stuff like that-

TM: Yeah.

DM: - the hardships of you even growing a beard, and you're inno..., you're not doing anything.

TM: Yeah.

DM: So.

TM: *Brother*, uh, do..., alright, do you have like-

DM: Yeah.

TM: -an email or something, for your use, checking or just the phone.

DM: Yeah, actually, I, I'm not even on the internet, trust me [laugh] there's no-

TM: O.k.

DM: -way I'm gonna be on the internet.

TM: O.k.

DM: So there's, Not that there isn't some here, but where I am right now, no.

TM: Yeah, [OV] you're with...

DM: [OV/UI]

TM: You're with the whole family; you're with the whole family?

DM: *Brother*, my whole family [Background UI conversation]

TM: So, are you gonna get a number [OV]

DM: [OV] *Brother*, Omar says...

TM: are you gonna get a- are you gonna get a number two or what?

DM: Yeah, [pause] what was that, *brother*?

TM: Are you gonna get a number two?

DM: I have... yeah, this number is mine.

TM: No, no I'm saying a number two wife-

DM: You can call [...]

TM: - a second wife.

DM: Oh, yeah, my...believe it or not *brother*, my wife is changed100- [Tarek laughs].*Brother*, my wife is looking for me a wife right now.

TM: *Whatever Allah wills.*

DM: She's interviewing sisters for me.

TM: *Whatever Allah wills.*

DM: *Brother*, I'm not kidding though, he's, he's talking about could I get a wife there? *Brother*, I walk down the street, when you're when you're not a, a regular guy here-

TM: Yeah.

DM: And you're light skin, like you're Arab or white.

TM: Yeah.

DM: Dude, you walk by and the [UI] will walk by you and go "*May Allah bless*".

TM: *Praise be to Allah.*

DM: And they say what you are. *Brother*, [Background UI conversation]. Yeah, but you know what the truth is? [Pause] Once you see the brothers, you're not want to get married, you're gonna [sic] want to make like just make sandwiches all day and hang with us.

TM: [Laugh]. *Whatever Allah wills .Whatever Allah wills.*

DM: *Brother*, I'm telling you, we're living the life you o- [...] that people only dreamed of.

TM: Dude, alright, Dan that's [...], Okay. *Allah willing* when you guys uh, when you [...] just keep in touch man-

DM: No, I'm saying, I'm o [...] - You know where I am right now, *brother*, do you know where I am right now. I'm on a beach *I swear to Allah the Almighty*, I'm on a beach after *the dawn prayer*.

TM: *Glory be to Allah.*

DM: I'm on a beach and the water is perfect and me and Omar are just sitting on the beach right now, chilling.

TM: Was there, was there any, was there any trouble getting in whatsoever, like asking you why you were there-

DM: -There was a little, there was a little with me, and they were talking about visa, but I yelled at them [laugh]. I yelled at the security telling him I haven't done nothing wrong why you stop me. I'm not doing anything wrong, I'm not planning on it, I'm just going somewhere.

TM: Yeah.

DM: And they were just like whatever, after I yelled for a while and screamed at them and told the guy I'm gonna beat him up, they-

TM: Yeah.

DM: -Told me whatever, get on with your family; don't worry about it just go.

TM: So, is this, is this your number?

DM: But I [OV/UI]

TM: Is this your number; is this your number that I can call you at?

DM: This is, this is my phone number you can call me at.
TM: O.k.
DM: You get a phone card?
TM: Yeah.
DM: Like an all Africa phone card or something, and you can call me anytime.
[Background UI conversation]
TM: *Allah willing*. Sounds great. *Brother-*
DM: Omar, Omar said-
TM: Yeah.
DM: He said, what [...] what, what *Allah* written, what *Allah's* written is gonna [sic] happen
TM: *Allah willing*.
DM: But, but right now, but right now you don't even have the intention. So make it now, and do it.
TM: *Allah willing*
DM: Just do [...], I'm telling you, *brother* I'm talking about if you can leave tomorrow, do it!
TM: I totally get you [OV]
DM: [OV] Cause right now-
TM: [Clears throat].
DM: *-brother* the doors are closing, fast.
TM: *Allah willing, Allah willing*.
DM: And right, right now I'm, uh right now we're in a point of uh, me and Omar were in a point where we have a lot of pull [OV] *Thank Allah*
TM: [OV/UI]
DM: [Laugh], where I can get you set up one hun- [...] one hundred and thousand percent. I can get you married and have money for you.
TM: That's awesome, dude.
DM: That's [UI], and that's beyond food and clothing.
TM: *Whatever Allah wills*.
DM: But bring whatever money you can.
TM: Yeah, well I'm trying-
DM: And just have that-
TM: Yeah, *Allah willing*.

DM: Have that for play money, but- but just so you have zero, you just have life, don't even worry about it, I can get you one hundred and thou- one thousand percent set up.

TM: *Whatever Allah wills.*

DM: I'll have a place for you to [...], I'll have people to pick you up a place for you to stay and heck if you want, I could have a wife waiting for you.

TM: That's what I want, that's what I'm there for [laugh]

DM: Exactly, uh, Omar was almost married in two days to a real good sister.

TM: [Laugh] *Whatever Allah wills.*

DM: I'm not kidding, *brother*. Here, to get married here is, it's just too easy. And some of the females, the females [static] talk to him, he's [beep] I have no money, I have nothing. He kept on saying it, and she's like "I don't care".

TM: Yeah.

DM: She's like "I don't care". And he's like I might not even be alive for long and she's like "I don't care".

TM: You can just like fly right in and like once you get to the airport it's just a breeze, I mean you [OV] there is no

DM: [OV] Yeah, okay what I did, I went, I went from Dubai, and there was gas, they were gas, you know, they fueled in Yemen-

TM: Yeah.

DM: -And went straight.

TM: M-hum.

DM: So, *brother*, I, I highly recommend [...] *brother*, this is, it's a *land*. It's a *land*. What more is there to say? It's the only *land*.

TM: Yeah.

DM: It's a *duty*, *brother*, this is like making *prayers*. You're not gonna [sic] sit there and say oh, I'm not going to make *dawn prayers*.

TM: Yeah, yeah I totally-

DM: This is *duty*, man you have -

TM: *Brother*, I have to ask this, but like are there books there that you can buy? [Laugh]

DM: Uh, not that I've seen, but I will tell you, you can borrow anyone of my books; I have a huge library. I brought [OV/UI]

TM: [OV] You brought, you brought... You brought everything with you?

DM: [OV/UI]

TM: [OV]. How the heck, how the heck did you do that man?

DM: I, I trusted in *Allah* and I left with nothing.

TM: Yeah, I understand but-
DM: I didn't even know-
TM: How did you bring all your books-
[Call disconnected]

Date of recording: 12/12/2006
Telephone#: 978-760-0658
Language: English/Arabic

Participants:

Tarek Mehanna TM
Daniel Maldonado DM

Abbreviations:

UI Unintelligible
[] Noise notations or Translator's Notes
SC Simultaneous Conversation
Italics Arabic

TM: *Peace be upon you*

DM: *Peace be upon you*. This is my last card, so I'm gonna be quick.

TM: *May Allah reward you*.

DM: Cause my wife never sees me, man.

TM: *May Allah reward you*.

DM: I'm never- I haven't seen my wife in a while.

TM: *May Allah reward you*, dude. Thanks a lot for calling, man -

DM: [SC] Quite alright, quite alright.

TM: I really wanted to hear your voice. But uh- anyway, so-

DM: *Brother*, I hope you- I hope you know you're the first person- you're the first brother I've called- so you're-

TM: [SC] *May Allah bless you*.

DM: [SC] - you're number one on my list

TM: *May Allah bless you*. But what I want to know is once you get there to the airport like, is it easy to- you know- get around or-

DM: You mean, once that you get there you'll be picked up, uh- immediately in a caravan .

TM: Alright so there is nothing like I have to meet this or meet that. It's just like straight up -

DM: No, no, no, you would -

TM: [SC] [UI]

DM: - If, if the people- if the brothers who control things, if they give you trouble, don't worry. All you gotta do is call me from Dubai, say when your flight is landing, and I will have people there waiting for you, and they are the ones who- who- who are in charge.

TM: *Glory be to Allah*

DM: So if any body gives you trouble, they'll walk right over and be like get out of here man. This guy is coming with us.

TM: That's awesome dude . [sigh]

DM: So you - you all-

TM: [SC] Then-

DM: So you're set. You- *Brother*, I've already put you through. You're cleared.

TM: *Whatever Allah wills*, dude. [Sigh] yeah-

DM: But just get here now.

TM: Yeah. My only thing is like I said, I just gotta [sigh] you know like- you know how it is.

DM: *Brother*, don't even thin- look. Look *brother*, look, I'm gonna tell you like you this -

TM: *Brother*, I- I- I know. I know-

DM: Don't even plan

TM: Don't- I understand, I understand, *Allah willing*.

DM: Don't even plan and like just go. Seriously, and you know what? Allah, Allah will- you know- Allah will provide for your parents. Allah will make it easy for you, *Allah willing*. And you know what, you can call them. It is *a duty*. Just do -

TM: [Giggle]

DM: Just do it. And just be like, when you get here, you be like "hey sorry"

TM: Yo, are there- are there like Sufis there, dude? Cause I want to join their *method*.

DM: [Laugh] Yeah, there are.

TM: *Whatever Allah wills*. Sheikh Nouh -

DM: *Brother*, the biggest -

TM: Sheikh Nouh -

DM: -The biggest, the biggest Sufi *method* in the world is here [Laugh]

TM: [Giggle] *Whatever Allah wills*. Alright , *brother*, look. Uhm- I don't wanna like say more things on the phone cause uh -[UI]

DM: Yeah I know. There is nothing- You are not doing anything wrong, so I wouldn't worry about it.

TM: Yeah, but you know how it is like you know- people can twist things.

DM: Yeah, that's- that's what I- that's why I'm trying to tell you how to do things proper because people get the wrong idea.

TM: Yeah.

DM: You just wanna come here and be able to pray five times a day, but people you know, they think things.

TM: Yeah. *So Allah willing*- [SC]

DM: -So, just keep in touch [SC]

TM: *Allah willing* like, *Allah willing* I'll keep in touch. I have your number and I'll give you a call. *Allah willing*.

DM: Yeah. Get a phone card for Africa. But you know I would recommend, that's the first thing you do. Today, go out and buy yourself like twenty dollars worth of card, just so you can constantly contact me, cause there is gonna be point in time where you can't contact me.

TM: O.k. *Allah willing*.

DM: You understand?

TM: Yeah, yeah. *Allah willing*.

DM: O.k.? *Allah willing*

TM: So this is- so this is your cell phone?

DM: Yes, it is.

TM: O.k. Alright.

DM: *Brother*, I'm gonna tell you just to influence you . *I swear by Allah, brother*, your religion changes the second you stop off here.

TM: Yeah, I'm sure-

DM: You-you- you think you are Muslim. *Brother*, people think they are *Muslim*? When you get here, you're *Muslim*. You're *Muslim, brother*. And you're encouraged to pray five times a day. E-E-Everything is real here, *brother*. It's the only life to live, man. I would- I'm never turning back man, *Allah willing. Allah willing*.

TM: *Allah willing*.

DM: This is the best, *brother*. I am so happy where I am. I've never been so happy.

TM: [Sigh] *Whatever Allah wills*. Alright man, look-

DM: -[UI] best brothers in the world.

TM: Dude, I- I- I'll get in touch with you, brother.

DM: But *brother* [Short Pause]

TM: Yes

DM: O.k.

TM: Go on, go on.

DM: [UI] about keeping in touch and do it now man. Do it now, now, now.

TM: *Allah willing*

DM: Uh- Seriously, no matter what you have planned, stop it now and do this.

TM: *Allah willing*.

DM: If you can, leave this week. I'm telling you, if you can leave this week. The doors are closing-

TM: But- But

DM: - You will regret it.

TM: I can't because I don't have enough money for an airline ticket [Giggle]. I'm still saving up, *Allah willing*.

DM: O.k. well, *brother*, if you can. You know what *brother*, if you can, for those brothers that believe in a good thing, you have-

TM: Yeah .

DM: -Have them pay for it, with no shame in that. Have them pay for it and they'll get the good deed. But do it within two weeks. The doors are closing, that's all I'm saying. And *Brother*, I know you, you will regret it.

TM: *Allah willing*.

DM: Do it now.

TM: *Allah willing. Brother*.

DM: O.k.

TM: *Allah willing*.

DM: Alright, alright *brother*.

TM: Take care *brother, Allah willing* and see you in *peace*.

DM: *Peace be upon you.*

TM: *Peace be upon you.*

DM: *Allah willing.*

End of call