

# United States District Court

SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

KIFAH WAEL JAYYOUSI  
KASSEM DAHER

(Name and Address of Defendant)

CASE NUMBER: 04-3565 RLD

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From in or about 1994 and continuing through in or about 2002, in Broward County, in the Southern District of Florida and elsewhere, the defendants Kifah Wael Jayyousi and Kassem Daher did:

knowingly and willfully combine, conspire, confederate, and agree with others to provide material support (as defined in 18 U.S.C. § 2339 A (b)) and to conceal and disguise the nature, location, source, and ownership of material support and resources, knowing and intending that they be used in preparation for, and in carrying out, a violation of Title 18, United states Code, Section 956(a)(1); and did

knowingly and willfully combine, conspire, confederate, and agree with others to commit at any place outside the United States, acts constituting murder, kidnapping, or maiming if committed in the special maritime and territorial jurisdiction of the United States, and did commit one or more acts within the jurisdiction of the United States

in violation of Title 18 United States Code, Sections 2339A, 956, 371 and 2.

I further state that I am a Special Agent of the Federal Bureau of Investigation, and that this complaint is based on the following facts:

Official Title

(SEE ATTACHED AFFIDAVIT.)

Continued on the attached and made a part hereof:  Yes  No

John T. Kavanagh, Jr.  
John T. Kavanagh, Jr., Special Agent  
Federal Bureau Of Investigation

Sworn to before me, and subscribed in my presence,

11 Dec 04 at  
Date ROBERT L. DUBÉ  
UNITED STATES MAGISTRATE JUDGE  
Name and Title of Judicial Officer

Miami-Dade County, Florida  
City and State  
[Signature]  
Signature of Judicial Officer  
I certify to be a true and correct copy of the original.  
Clarence Maddox, Clerk,  
U.S. District Court  
Southern District of Florida  
By [Signature]  
Deputy Clerk

**AFFIDAVIT**

I, Special Agent John T. Kavanaugh, Jr., Federal Bureau of Investigation, being first duly sworn, do hereby depose and state as follows:

**I. INTRODUCTION**

1. I am a Special Agent with the Federal Bureau of Investigation (hereinafter "FBI") currently assigned to the Joint Terrorism Task Force (JTTF) for the Southern District of Florida since February 2002. I have been employed by the FBI for approximately five and one-half (5½) years. My duties and responsibilities as a member of the JTTF include the investigation of terrorism, terrorist organizations and the material support of terrorist organizations. I make this affidavit in support of a criminal complaint charging KIFAH WAEL JAYYOUSI a/k/a Abu Mohamed (hereafter "JAYYOUSI") and KASSEM DAHER a/k/a Abu Zurr (hereafter DAHER) with providing and conspiring to provide material support and resources and concealing and disguising the nature, location, source and ownership of the material support and resources knowing and intending that they were to be used in preparation for and in carrying out a violation of Title, 18 U.S.C. § 956(a)(1), that is, a conspiracy to kill, kidnap, maim and injure persons in a foreign country, and for conspiring and aiding and abetting a conspiracy to kill, kidnap, maim and injure persons in a foreign country; all in violation of Title 18, U.S.C. §§ 2339A(a), 956(a)(1), 371 and 2. This affidavit is submitted for the limited purpose of establishing probable cause, and therefore does not set forth all the facts of the investigation known to me. This affidavit is based upon my own personal knowledge, facts related to me by other law enforcement officers and government officials, as well as other information obtained through research during the course of this investigation. A significant amount of information has been derived from court-authorized electronic surveillance.

## II. HISTORICAL BACKGROUND OF INVESTIGATION

### ~~2. The conspiracy described below is rooted in the wider Salafist violent jihad movement.~~

In the late 1980's, a loose, transnational network of radical Islamists launched a holy war to drive American military forces from the Arabian peninsula, erode American support of Israel, undermine American support of regimes in the Middle East that were viewed as insufficiently Islamic, and participate in armed confrontations around the world to establish Islamic states under Sharia, meaning strict Islamic law, as ordained by the Caliph, the name of the successor to the Prophet Mohammad and supreme Islamic ruler.

3. This network was heavily influenced by Islamic religious fundamentalism, which sought to establish a pure Islamic state and regarded modern Western civilization as a symbol of evil, spreading idolatry and secularism. Groups espousing this radical Islamic fundamentalism include the Islamic Group, a/k/a "Gama'a al-Islamiya," a/k/a "IG;" Egyptian Islamic Jihad, a/k/a "Islamic Jihad," a/k/a "al-Jihad," a/k/a "EIJ;" and al Qaeda, which oppose countries, governments, institutions, and individuals that do not share their view of Islam. These groups consider their enemies to be infidels, and embrace the concept of violent jihad, or holy war, as a means to oppose the infidels by force and violence. Members of these Muslim extremist groups have taken credit for many international terrorists acts, including the 1981 assassination of Egyptian President Anwar Sadat; the 1997 massacre of more than fifty foreign tourists at Luxor, Egypt; and the 1995 attempted assassination of Egyptian President Hosni Mubarak in Ethiopia.

4. Many ideological advocates of violent jihad sought refuge in various Western democratic countries. Relevant to this investigation are Sheikh Rahman (the spiritual leader of IG), Sheikh Talaat Fouad Qassem, a/k/a Abu Talal al-Qasimy (IG leader until his disappearance in 1995), Sheikh

Anwar Shaaban (director of the Islamic Cultural Institute in Milan Italy, active supporter of IG and spiritual leader of the Arab mujahideen in Bosnia until his death in 1995) and Sheikh Shawqi Mohammed (IG leader in Vienna, Austria). In July 1993, Sheikh Rahman was arrested, indicted, and later convicted for his participation in a failed plot to bomb a series of New York City landmarks and soliciting the murder of Egyptian President Hosni Mubarak.

5. By the time of Sheikh Rahman's arrest, a number of followers and supporters of Sheikh Rahman had established a North American support network (U.S. and Canada) that supplied money, financial services (fundraisers), personnel (fighters), transportation, false documentation or identification, training, communications equipment, and other physical assets to military components of the Salafist violent jihad movements in Afghanistan, Bosnia, Chechnya, Eritrea, and Somalia, among others.

6. In addition to the extremist spiritual leaders described above, the Salafist violent jihad movement was led by a number of military commanders on the ground, including Abdelkader Mokhtari, a/k/a Abu al-Ma'ali, the Algerian-born military commander (Emir) of the foreign mujahideen in Bosnia; Shamil Basayev, the military commander of the Chechen rebels; Samir Saleh Abdullah Al-Suwailem, a/k/a Ibn Omar al-Khattab (Khattab), the Saudi-born military commander of the Majlis al-Shura of the Mujahideen of Chechnya and Dagestan until his death in 2002; and Fathi Mohamed Habib, a/k/a Sheikh Fathi Shishani (Sheikh Fathi), a leader in the *Jama'at Islami* and preacher of violent jihad in Chechnya. Sheikh Fathi was also a major conduit for providing material support to the Chechen rebels. Sheikh Fathi died of natural causes in Chechnya in 1997.

### III. THE JAYYOUSI, DAHER, HASSOUN NORTH AMERICAN SUPPORT NETWORK

7. The investigation of JAYYOUSI, DAHER and Adham Amin Hassoun (Hassoun) began in late 1993 and revealed that they had formed a network across North America to fundraise for and recruit mujahideen to train and fight in various jihad areas including but not limited to Bosnia, Kosovo, Chechnya, and Somalia.<sup>1</sup> An early focus of this investigation was Mohamed Zaky (Zaky), a San Diego based supporter and follower of Sheikh Rahman. Zaky founded and operated two non-government, not-for-profit organizations (Save Bosnia Now and the Islamic Information Center of the Americas), which he used as a cover to facilitate his violent jihad activities. In 1995, Zaky changed the name of Save Bosnia Now (SBN) to American Worldwide Relief (AWR) in order to facilitate his expanded support for violent jihad worldwide. SBN (and later AWR) maintained offices in La Jolla, California; Travnik, Bosnia; Sarajevo, Bosnia; Freiburg, Germany; and Zagreb, Croatia. In the United States, Zaky, JAYYOUSI, DAHER, and Hassoun would use the cover of these ostensibly charitable organizations to raise money and recruits for violent jihad. The overseas offices served as safe-houses for individuals on route to fight violent jihad. Zaky fought with the Arab mujahideen in Afghanistan in the 1980's.

8. Zaky also participated in fighting with Bosnian Muslims on two occasions between 1993 and 1994. He specialized in making videotapes of the fighting which he then used as part of his fundraising activities in the United States to support violent jihad. In May 1995, Zaky was killed

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Adham Amin Hassoun (Hassoun) a/k/a Abu Sayyaf has been in U.S. custody since June 12, 2002. He was ordered removed from the United States, and on October 7, 2004, was indicted by a federal grand jury in the Southern District of Florida (04-60001-Cr-Cooke(s)(s)(s)) for conspiracy to provide and providing material support to terrorists and conspiracy and aiding and abetting a conspiracy to kill, kidnap, and maim persons in foreign countries, in violation of Title 18, U.S.C. §§ 2339A(a), 956(a)(1), 371 and 2. Hassoun is more fully described in paragraph 19.

while fighting against the Russians in Chechnya.

9. ~~JAYYOUSI is a Jordanian national and naturalized American citizen. He was a close~~ associate of Zaky and a supporter and follower of Sheikh Rahman. Shortly after the arrest of Sheikh Rahman, JAYYOUSI founded the American Islamic Group (AIG). AIG, through JAYYOUSI, published a newsletter, the Islam Report, in which he promoted violent jihad and reported on developments in the prosecution of Sheikh Rahman, which he editorialized as the case of the U.S. v. Islam. The Islam Report was published at least as early as April 1994 and continued through as late as July 1996. Similar to SBN and AWR, AIG touted itself as a “non-profit, religious service institution primarily established to protect the rights of Muslims and to provide economic, humanitarian, educational assistance to the needy.” It described the purpose of its monthly publication, Islam Report, as “a humanitarian Islamic organization aim[ed] to expose and analyze threats against Islam and Muslims Worldwide.” Islam Report, Vol. II, Issue 8, December 1994. In reality, the main purpose of AIG and the Islam Report was to recruit fighters and solicit money to support the Salafist violent jihad movement. JAYYOUSI described AIG as “the voice of the mujahideen.” He also used the Islam Report to disseminate accomplishments of mujahideen in various “theatres of jihad” describing in graphic detail murders, executions and massacres committed by them.

10. JAYYOUSI was active in fundraising for violent jihad on behalf of SBN and AWR, and after Zaky’s death took over the operation of AWR. JAYYOUSI used the Islam Report to solicit funds to support violent jihad by advertising AIG, SBN, and AWR. JAYYOUSI published, “Victory for mujahideen will only come from the Almighty, however every Muslim must do his part in support of Islam, in support of Mujahideen Families, in support of Martyrs Families, and in support

of Muslim prisoners, torture victims and Scholars.” Islam Report, Vol. II, Issue 8, December 1994.

~~AIG’S calls for monetary support for violent jihad were published worldwide over the internet at~~  
islam@powergrid.electriciti.com. Also in the same Islam Report above, JAYYOUSI described Mahmud Abouhalima, one of several coconspirators convicted for bombing the World Trade Center in 1993, as “A Good Citizen and a Muslim Hero.” From 1994 through late 1995, JAYYOUSI also had direct telephone conversations with Sheikh Rahman from prison.<sup>2</sup> JAYYOUSI would update the Sheikh with jihad news, many times reading accounts and statements issued directly by terrorist organizations such as IG in Egypt and the Armed Islamic Group (GIA) in Algeria.

11. During one call on February 5, 1995, in which JAYYOUSI and DAHER both participated, DAHER connected Sheikh Rahman to speak to Sheikh Shawqi Mohammed in Vienna, Austria. During their conversation Sheikh Shawqi asked Sheikh Rahman if he would like to convey anything to Abu Talal (Talaat Fouad Qassem, an IG leader in Europe). Sheikh Rahman replied, “May Allah facilitate your affairs.” JAYYOUSI was always very deferential to Sheikh Rahman during these conversations and consistently pledged his eternal support for him.

12. During the course of this investigation JAYYOUSI resided in San Diego, California; Los Angeles, California; Detroit, Michigan; and Baltimore, Maryland. JAYYOUSI moved to Egypt in 2003.

13. DAHER is a Lebanese national with Canadian residency status. DAHER was also a close associate of Zaky, JAYYOUSI, and Hassoun, as well as a supporter and follower of Sheikh Rahman. During the times relevant to this investigation, DAHER resided in Le Duc, Canada.

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Unless otherwise noted, all references to conversations or discussions are court authorized electronic intercepts.

DAHER also assisted in distributing the Islam Report.

~~14. In a March 31, 1994 conversation between DAHER and JAYYOUSI, DAHER~~  
instructed JAYYOUSI not to send the Islam Report to the brothers in Austria since he was a regular “customer” with them. DAHER further advised JAYYOUSI to leave Europe to him as he (DAHER) had been in touch with the brothers in Europe for the past two years. Subsequent conversations revealed that DAHER was closely connected to IG leadership in Europe (Sheikh Talaat Qassem in Denmark and Sheikh Shawqi Mohammed in Austria).

15. On or about February 5, 1995, DAHER traveled to San Diego where he stayed with JAYYOUSI. While there, DAHER, JAYYOUSI and Zaky discussed many aspects of their respective participation in the Salafist violent jihad movement. DAHER informed Zaky and JAYYOUSI that he had stayed at Sheikh Abu Talal’s house in Denmark. Zaky told DAHER that when he was in Bosnia, Abu Al Harith (the first Emir or leader of the Arab mujahideen in Bosnia) wanted him “to go to Indonesia to see the brothers ... who wanted to go do jihad in Bosnia.” Zaky and DAHER discussed the fighting then going on in Chechnya and agreed that Chechnya “comes first.” Zaky told DAHER that he still wanted to go to Indonesia and Malaysia and “if there are a lot of people who want to go, we will try to direct them to Chechnya.” DAHER told Zaky that he had been to Dagestan to “study the situation.” Both men then discussed the problem of funding and how many mujahideen, including themselves, have to return from fighting jihad to take care of their families. DAHER told Zaky “we have brothers in Lebanon who are ready to go to Chechnya but there’s no money.” DAHER told Zaky that they needed someone they could trust in Azerbaijan and Dagestan to be in charge. Zaky told DAHER that if “we were in Bosnia or any other place in Europe, one will have some freedom, then the jihad front line which exists in Europe will be made

between Bosnia and the Chechens and then Chechnya will expand, Dagestan will join, and that will open up, God willing.”

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16. In the same February 5, 1995 conversation, DAHER told Zaky, “most of what was written about the Chechens comes to us from London now.” DAHER told Zaky that “we send everything to brother Kifah here.” Zaky informed DAHER he knows a brother that represents the brothers in Eritrea and another brother who represents Ogaden in a movement in Somalia. DAHER explained to Zaky that he gets Al Ansar from Algeria, the Al Murabitoun from Egypt, and the Al Mujahideen from the group of the Jihad in Egypt. Your affiant knows that the Al Ansar, Al Murabitoun and Al Mujahideen publications served as media outlets for communiques issued by the terrorist groups the Armed Islamic Group (GIA) in Algeria; The Islamic Group (IG) in Egypt; and the Egyptian Islamic Al Jihad Group in Egypt, respectively. DAHER told Zaky that, we are in charge of it in Canada. Zaky replied, “I know. He told me ... I was talking to Shawqi when I went this year ... he told me that you’re in charge to send you everything. He told me that it would be better if you send me these things.” Later in the conversation, DAHER told Zaky and JAYYOUSI, “We know all the leaders of the Islamic Group in Egypt ...the Islamic Group in Algiers ... everyone. I mean, the majority I mean, we don’t have, I mean, that’s it, we (UI) we help everyone.” Zaky responded, “Thank God. That is what we want.” DAHER then stated, “as long as there is slaughtering, we’re with them. If there’s no slaughtering, there’s none ... that’s it, buzz off.” DAHER then told Zaky and JAYYOUSI he was going to publish a booklet titled Terrorism Is A Duty and Force Is An Obligation and have it distributed to the whole world. In referencing this booklet, DAHER mentioned “this is the first Murabitoun issue.” Your affiant knows that during the investigation into the World Trade Center bombing in 1993, searches of two of the participant’s

property (Ahmad Ajaj and Mahmud Abouhalima) revealed that they possessed this same article that was published in Al Murabitoun.

17. DAHER and JAYYOUSI also discussed setting up a for-profit business in order to fund jihad. DAHER stated, "Uh ... this business ... the profit generated from this business will be for the brothers, I mean we have to support the mujahideen brothers, I mean." JAYYOUSI agreed. In discussing their current situation, Zaky told DAHER and JAYYOUSI that he wanted to "make an amendment to it (referring to changing the name of his organization SBN to AWR), because we did it for Bosnia, so it was meant for a specific objective." DAHER then mentioned his organization, the Canadian Islamic Association, which he described as a "cover, I mean it's very good." In a later conversation on April 1, 1995, with a new representative for AWR in New Jersey, Zaky described one of his organizations, the "Islamic Information Center Of The Americas," as a "covering ... because they are tightening it on us, especially the fundraising story and all these things."

18. In May 1998, DAHER departed Canada for Lebanon where he remains today.<sup>3</sup>

19. Adham Amin Hassoun a/k/a Abu Sayyaf (Hassoun) is a Palestinian national born in Lebanon. He came to the U.S. in 1989. At all times material to this investigation, Hassoun worked and resided in Broward County, Florida within the Southern District of Florida. Hassoun was a close associate of Zaky, JAYYOUSI, and DAHER. Hassoun was the East Coast representative of AIG

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Effective October 26, 2001, pursuant to §§ 808 and 809 of the PATRIOT ACT, the statute of limitations for violations of 18 U.S.C. §§ 2339A and 956(a)(1) was extended from five years to eight years. Section 808 expanded the definition of a federal crime to terrorism found at §2332(b)(g)(5)(B) to include §956(a)(1), and § 809 extended the statute of limitations to 8 years for any federal crime of terrorism listed in §2332(b)(g)(5)(B) . Section 809 further states that the amendments made by this sections shall apply to the prosecution of any offense committed before, on, or after the date of the enactment of this section.

and AWR and assisted JAYYOUSI in distributing the Islam Report in South Florida. Zaky, JAYYOUSI, DAHER and Hassoun communicated frequently and coordinated their violent jihad activities from their respective geographical locals. Hassoun has been in U.S. custody since June 12, 2002. He has been ordered removed from the United States, and on October 5, 2004, was indicted by a federal grand jury in the Southern District of Florida (04-60001-Cr-Cooke(s)(s)(s)) for conspiracy to provide and providing material support to terrorists and conspiracy and aiding and abetting a conspiracy to kill, kidnap, and maim persons in foreign countries, in violation of Title 18, U.S.C. §§ 2339A(a), 956(a)(1), 371 and 2.

20. A strong illustration of the triangulated support provided by JAYYOUSI, DAHER and Hassoun to the Salafist violent jihad movement is a three-way conversation among them on March 21, 1995. During the conversation, Hassoun stressed the importance of coordination when, as he stated, "we have a number of people active in the field." Hassoun then described their efforts: "All of us are in a chain, if one link of the chain is separated, the movement will not function." Hassoun then stated that this concept is particularly important in the field of "tourism." Your affiant knows from other conversations and witnesses that "tourism" is a code word utilized for violent jihad. All three also discussed the importance of maintaining contact with Zaky, who was preparing to travel to Chechnya to participate in violent jihad.

21. In a subsequent phone call between Zaky and DAHER on April 14, 1995, DAHER asked Zaky to make sure that he transmits to Hassoun all the information that he acquires abroad. DAHER explained to Zaky that it does not matter to whom the information is transmitted because they are all "one and the same."

22. Each member of this network also worked within their respective geographical location

to develop and nurture a close-knit cadre of violent jihad followers, several of whom actually traveled overseas to fight in Bosnia, Chechnya and Kosovo. In or around 1995 through 1996, JAYYOUSI recruited and sent at least two individuals overseas in support of violent jihad. One recruit, among other things, assisted him with providing at least two satellite phones to Chechen commanders. One of the phones went to Sheikh Fathi. Another recruit was an American convert to Islam who fought in both Bosnia and Chechnya. After the U.S. invasion of Afghanistan in October 2001, the FBI obtained an application (Mujahideen Data Form) dated July 24, 2000, for one of Hassoun's jihad recruits (Ibrahim) for training at a camp in Afghanistan. In a September 2000, telephone call between Hassoun and another of his jihad recruits who was in Egypt, the recruit told Hassoun "there is a way" and that "God willing, we will be there by Saturday or Thursday." The recruit further described his destination as, "there by Usama ... Khattab's company." When asked by Hassoun the whereabouts of Ibrahim, the caller stated, "Ibrahim is a little further south ... he is supposed to be there by Usama and then he could be able to go to Kh... little further north." Based on the above your affiant believes that the recruit, Ibrahim, was attending a training camp in Afghanistan in preparation for fighting in Chechnya under Khattab and that the other recruit was preparing to travel to Chechnya to fight under Khattab's command.

#### **IV. ADDITIONAL MATERIAL SUPPORT AND RESOURCES<sup>4</sup>**

23. In addition to the specific forms of material support described throughout this complaint,

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As defined in 18 U.S.C. § 2339A(b) during the period at issue, material support and resources means currency or other financial securities, financial services, lodging, training, safehouses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel, transportation, and other physical assets, except medicine or religious materials.

the following acts are illustrative of the types of funds and assets that JAYYOUSI, DAHER, ~~Hassoun provided or conspired to provide to the mujahideen in various violent jihad theatres~~ overseas:

24. Between June 1994 and January 1997, Hassoun remitted checks totaling at least \$19,000 to JAYYOUSI, DAHER, or alleged charitable organizations associated with JAYYOUSI and DAHER, which contained coded notations such as "Support for the person," "for tourism," "for brothers," and "for tourism and tourist." These checks were intended to assist and fund persons engaged in violent jihad. For example, on or about June 13, 1994, Hassoun sent a \$1,000 check to JAYYOUSI with a memo "Support for the person." This money was intended as support for Zaky's family while he was participating in violent jihad in Bosnia. On or about January 28, 1995, JAYYOUSI stated that money donated would be used to purchase airline tickets for "brothers" traveling to Chechnya to do "jihad."

25. In 1995 through 1996, JAYYOUSI sought to procure and deliver a variety of communication devices (satellite phones, walkie-talkie radios, and a global position device) to the Chechen mujahideen. For example, in or around June 1995, JAYYOUSI instructed a representative of AWR in Baku, Azerbaijan to use \$22,000 to purchase items needed for Sheikh Fathi's mujahideen. The same representative advised JAYYOUSI that the "head of the company on the inside" (one of the mujahideen commanders) needed a satellite phone. From mid-1995 through early 1996, JAYYOUSI and others procured and provided two satellite phones to Chechen mujahideen leaders. These phones were eventually identified and their signals cut off by the Russian government. On or about February 18, 1996, JAYYOUSI ordered two walkie-talkie radios to be sent to Chechnya. And, on or about February 26, 1996, a representative of AWR advised JAYYOUSI

that the GPS (global positioning system) would be on its way (to Chechnya) soon.

~~26. JAYYOUSI, DAHER, and Hassoun had ongoing discussions with each other and other~~  
people about the opportunities for jihad training and violent jihad in various regions of the world (including Afghanistan, Bosnia, Somalia and Chechnya) and their support for these violent jihad efforts. For example, on or about June 25, 1995, DAHER advised JAYYOUSI and Hassoun that a military training camp was being opened in Afghanistan for whoever wanted to train. On or about August 30, 1996, JAYYOUSI advised two individuals that a group of mujahideen that had been in Bosnia had fought a group of Ethiopians in Somalia during which ten mujahideen and ninety Ethiopians were killed. On or about September 1, 1996, Hassoun instructed an individual who was in Egypt to go to Somalia because "there is jihad" in Somalia. On or about January 27, 1997, Hassoun told DAHER "because they are playing football (soccer) in Somalia ... we are sending soccer uniforms and sneakers." Your affiant knows that "playing football" is a code word used by the conspirators to refer to violent jihad. On or about April 16, 1998, DAHER described to Hassoun a videotape he called an "entrusted thing" that was only be given to "those who can be trusted," and "every penny raised from this tape should get to . . . to Khattab."

27. JAYYOUSI continued to focus on Chechnya up until at least November 15, 1999, when he had a conversation with a former representative of AWR who was overseas. This individual told JAYYOUSI that he was raising funds for "the brothers" (in Chechnya) and wanted JAYYOUSI to do the same. JAYYOUSI told this individual that they were transferring some funds through "Global Relief Foundation." This individual confirmed that he was also. Your affiant knows that the "Global Relief Foundation" was ostensibly an Islamic charitable organization similar to AWR. The Global Relief Foundation, Inc. was designated as a "Specially Designated Terrorist Entity" on

October 18, 2002, pursuant Executive Order 13224 issued under the authority of Title 50. U.S.C. § 1701, *et. seq.*, the International Emergency Economic Powers Act.

**V. CONCLUSION**

28. Based upon the information contained in this affidavit, there is probable cause to believe that KIFAH WAEL JAYYOUSI, KASSEM DAHER and others have committed violations of Title 18, United States Code, Sections 2339A(a) (providing material support to terrorists), 956(a)(1) (conspiracy to kill, kidnap, maim, or injure persons in a foreign country), 371 (conspiracy), and 2 (aiding and abetting the listed offenses). Affiant requests a warrant issue for their arrest.

**FURTHER YOUR AFFIANT SAYETH NAUGHT**

John T. Kavanaugh, Jr.  
John T. Kavanaugh, Jr.  
Special Agent, Federal Bureau of Investigation

Sworn and subscribed to  
before me this 1 day of  
December, 2004

Robert L. Dubé

ROBERT L. DUBÉ  
UNITED STATES MAGISTRATE JUDGE

Certified to be a true and correct copy of the original.  
Clarence Maddox, Clerk,  
U.S. District Court  
Southern District of Florida  
By Abid Deputy Clerk  
Date 12/1/04