

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA	:	Case Number 3:04CR301(JCH)
	:	
v.	:	
	:	
BABAR AHMAD a/k/a “Abu Ammar”,	:	
a/k/a “Abu Khubaib/Kubayb Al-Pakistani”	:	
a/k/a “Salah” / “Salahuddin”, a/k/a	:	
“Dr. Karim”, a/k/a “D. Karim”, a/k/a	:	
“Maria Alcala”, a/k/a “Lara Palselmo”	:	
a/k/a “Mr. B”	:	JUNE 16, 2014

GOVERNMENT’S SENTENCING MEMORANDUM

On July 16, 2014, the Court will sentence the defendant, Babar Ahmad (“Ahmad”), for conspiring to provide and providing material support to terrorists, knowing and intending that such support would be used in preparation for and in carrying out: (1) a conspiracy to kill, kidnap, maim or injure persons or damage property; or (2) the murder of U.S. nationals abroad. Ahmad’s conduct, summarized in part below, warrants the maximum sentence of twenty-five (25) years.

From at least 1997 through his arrest in August 2004, Babar Ahmad – through the use of numerous kunyas and aliases – surreptitiously led a sophisticated, highly organized, technically savvy and operationally covert support cell in London with global reach, through which he supported the Chechen mujahideen, the Taliban and Al-Qaida. Ahmad’s material support operation was robust, far-reaching and virtually unprecedented in its scope – indeed, Ahmad and his cell provided almost every single category of support set forth in the material support statute. Ahmad supplied funds, military equipment, communication equipment, lodging, training, expert advice and assistance and personnel – all of which were designed to raise funds, recruit for and provide equipment to the Chechen mujahideen, the Taliban and Al-Qaida, and to otherwise

support violent jihad in Afghanistan and Chechnya. PSR ¶ 17.

Ahmad had direct, personal access to terrorist leaders and his substantial work supporting them gained their attention, gratitude and praise. Indeed, Ahmad's Azzam Publications propaganda video "Martyrs of Bosnia Part I," contained a video-taped message with English subtitles from then-Chechen mujahideen commander Ibn Khattab. In the clip – which Babar Ahmad personally filmed – Khattab stated, in pertinent part, that Azzam Publications maintained regular contact with the Chechen mujahideen and that anyone who wished to support them should contact Azzam Publications. Khattab stated, on film:

The Brothers in Britain, may Allah reward them, have put much efforts to publicize the Jihad. There is an organization by the name of Azzam Publications, which is run by brothers who are known to us and maintain regular contact with us. So anyone who wishes to support us or requires further information about the situation here, they should contact this organization

PSR ¶ 81.

One of the means that Ahmad used to provide his far-ranging support was his surreptitious operation of a series of then pre-eminent, world-wide jihadi websites which, for a period of time, were made possible through the unwitting services of a website hosting company located in Connecticut. The websites, several of which were operated in English, were among the first of their kind, and for several years, Azzam Publications' sites were the top mujahideen propaganda sites on the Internet, featuring jihadi training manuals, interviews with Al Qaida and Chechen leaders and associates, and the stories and martyrdom videos of many fallen jihadists. The expressly stated purpose of the Azzam sites was to "incite the believers and also secondly to raise some money for the brothers." Among other things, the Azzam sites: (1) published Usama bin Laden's 1996 Declaration of War as well as an exclusive interview in 2003 with Al-Qaida's then

second-in-command Dr. Ayman al Zawaahri; (2) posted various manuals and articles on how to train for jihad before traveling abroad to fight, including instructions on obtaining physical, martial arts, survival and firearms training; (3) provided specific guidance on how to support the jihad and the mujahideen, including: overt appeals for people to physically fight in the jihad battle fronts; requests to raise, collect and donate money to support the jihad; and solicitations to join or otherwise support the organization; (4) set forth postings extolling the virtues of martyrdom; (5) provided postings on a female's role in jihad, including raising funds; physical training, firearms training and raising mujahid children by obtaining for them martial arts training, target shooting and camping/survival training; and (6) posted a practical guide to dealing with law enforcement, which contained specific advice on how to prevent and deal with law enforcement interviews, searches, raids, visits from intelligence agents, and arrests. PSR ¶¶ 18, 47-49, 69-74.

The intention of these materials – to provide material support and propagate the call for violent jihad – was clear. A particularly stark example was the “Raising Mujahid Children” section in the “Sisters’ Role in Jihad” posting (which the defendant has described as encouraging children to engage in “various childhood activities that Muslim children could practice to later defend themselves and their communities, *such as swimming, martial arts, horseback riding, skiing and camping.*”) See Defendant’s Version of the Offense at 38, ¶ 131 (emphasis added).

The “Raising Mujahid Children” section, however, stated:

Don’t wait until they are seven to start, for it may be too late by then! Some practical tips that most sisters can implement without difficulty are as follows:

Tell children bedtime stories of Shuhadaa and Mujahideen

. . . It is a good idea to start your children young in terms of introducing them (through safe toys) to target-shooting under complete adult supervision. Make it

very clear who their target should be and who their target should NOT be If you can spare the time to spend with your children and play military games with them in a fun way, and get them interested in these (as opposed to other, largely useless, but very popular games and sports), then that will insha'Allah be counted as Jihad in itself (as preparation for Jihad is a part of Jihad). You can practice in front of them in your own home using their toys. Children learn by imitating what adults do. Insha'Allah you will find them interested and imitating your actions and they will become disciplined experts before you know it.

Get your children interested in Jihad by getting military books (preferably with pictures) and other similar books Show them the pictures of Mujahideen (while making dua, praying, in training, etc. -- nothing "graphic" please) and encourage them to become like these people at the least. Introduce them to various weapons and military vehicles through pictures and toys Don't underestimate the lasting effect of what these little eyes and ears take in during the first few years of life!

PSR ¶ 73.

On the Azzam Publications sites, visitors could order various products promoting violent jihad, including: (1) audio tapes entitled "In the Hearts of Green Birds" and "Under the Shades of Swords;" which were narrated by Babar Ahmad; (2) books such as "In Pursuit of Allah's Pleasure," and Sheikh Abdullah Azzam's "Join the Caravan;" and (3) CD-ROMs and videos entitled "Russian Hell in the Year 2000;" "Chechnya from the Ashes;" and "The Martyrs of Bosnia Part I." Orders were only accepted by mail, and payment was only accepted in cash. PSR ¶ 75.

The videos offered for sale on the sites were full-length, professionally edited features. For example, the "Martyrs of Bosnia video" ran approximately 150 minutes long, included English commentary and subtitles and was marketed by Azzam as "the first ever mujahideen video in the English language." PSR ¶ 76. The videos included graphic acts of violent jihad, eulogies extolling martyred mujahideen, before-and-after photos of dead mujahideen, martyrdom videos made by mujahideen before engaging in a "martyrdom operation," and video footage of combat and "martyrdom operations" – all *deliberately* taped on film to propagate the call for violent jihad.

Often accompanying the footage was Nasheed music, religious texts, and English subtitles setting forth, e.g., the rewards that a martyr could expect to receive in heaven. In one clip from “Russian Hell,” then Chechen mujahideen commander Ibn Khattab is seen interacting with a captured and injured Russian soldier, repeatedly having him get up and walk about, before Khattab executes him with an automatic weapon at short range – again, all deliberately filmed. Nasheed music then plays while the body of the dead Russian soldier is shown, with a Russian military vehicle burning in the background. PSR ¶ 80.

The Azzam sites also provided detailed instructions on how to make financial donations and provide other direct assistance to the Taliban and the Chechen mujahideen. At various times, for example, the sites included: (1) an urgent appeal for large quantities of gas masks; NBC (nuclear-chemical-biological) suits; and donations for the Taliban; (2) an urgent appeal for cash donations to support the Taliban, which contained explicit and detailed instructions on how to personally deliver amounts in cash in excess of \$20,000.00 (US) to the Taliban Consul General in Pakistan; and (3) an express solicitation of individuals around the world to travel to Afghanistan to fight for the Taliban. PSR ¶¶ 19, 50-68.

Ahmad’s conduct went far beyond cyberspace and included real world effects and consequences flowing from the criminal activity, regardless of the media used to plan, coordinate and execute some of the conduct. For example, in addition to the postings on the websites, Azzam Publications also operated and administered certain email accounts associated with the sites. Through those email accounts, Ahmad and Azzam Publications engaged in efforts to assist those who responded to the websites’ calls for support. Recovered emails include, for example, discussions regarding donations; shipments of gas masks; procurement of night vision goggles;

safe routes into Afghanistan and the type of personnel needed to support the jihad. PSR ¶ 20. 131-143.

Ahmad and his associates also recruited and arranged for individuals to travel to Afghanistan to train for violent jihad; and made efforts to secure additional equipment including 100 cold weather camouflage combat pants and jackets, GPS devices, Kevlar helmets, ballistic vests, satellite phones and laptops pre-loaded with encryption software. PSR ¶¶ 21, 144-47.

Also, during a search of one of Ahmad's residences in London in December 2003, Ahmad was found in the possession of an electronic document containing what were previously classified plans regarding the advance movements of a United States Naval battle group as it was to transit from California to its deployment in the Middle East. The document also discussed the battle group's makeup, mission and perceived vulnerability to terrorist attack. Forensic analysis determined that co-conspirator Syed Talha Ahsan ("Ahsan") had previously possessed, accessed, modified and re-saved the electronic battle group document before it was found in Babar Ahmad's possession. PSR ¶¶ 22, 110-130. *See* Exhibit A (the "battle group document").

Forensic analysis of computer media seized in 2004 from Ahmad's residences, office, and related locations also recovered deleted – but recovered – documents including: (1) a detailed briefing to be given to recruits surreptitiously traveling to Afghanistan, through Pakistan, to train and fight in violent jihad, *see* the "Briefing.txt" document, PSR ¶¶ 150-52 and the "Details.txt" document, PSR ¶ 153, *see also* Exhibit B (the "briefing.txt" document) and Exhibit C (the "details.txt" document); (2) detailed instructions about the provision of, and how to use, encrypted laptops and satellite phones being provided to individuals in Chechnya, including Ibn Khattab, PSR ¶¶ 146-47, *see also* Exhibit D (the "equipment documents"); and (3) 35 pages of remnants

from a detailed outline on how to experiment with and create various explosive materials and improvised explosive devices. PSR ¶¶154-162; *see also* Exhibit G (the “explosives document”) (filed under seal).

Ahmad also sent individuals to training camps in Afghanistan. One individual that Ahmad sent to Afghanistan to train (the “witness”) has testified, under oath, in connection with the sentencing proceedings in this case, pursuant to a deposition abroad permitted by the Court under Rule 15 of the Federal Rules of Criminal Procedure.

The witness – who has a remarkable memory, indeed, having memorized the Koran at the age of 12, *see* Deposition Tr. dated April 9, 2014 at 75 – testified that he was inspired, in part, by what he referred to as the “unique” English language audio cassettes promoting violent jihad and narrated by Babar Ahmad including “In the Hearts of Green Birds” and “Under the Shades of Swords.” *See, e.g.*, Deposition Tr. dated April 9, 2014 at 59-64, 71. The witness became a member of a sub-group of Babar Ahmad’s so-called Tooting Circle, the sub-group of which was led by Ahmad and focused on and supported violent jihad. *See, e.g.*, Deposition Tr. dated April 9, 2014 at 75-78. In the sub-group led by Ahmad the witness and others used code words to refer to particular lands of jihad – “Aberdeen” for Afghanistan, “Bradford” for Bosnia and “Catford” for Chechnya – because “what we were doing could be deemed as criminal or criminal activity, in which case we [took] steps towards not drawing attention to what we’re doing by using things like code names and code words.” *See* Deposition Tr. dated April 9, 2014 at 95.

Prior to sending the witness to serve as his representative in Afghanistan and receive recruits, Babar Ahmad groomed the witness with gradually increasing involvement and tasks, including the following.

Babar Ahmad gave the witness funds to deliver to a mujahideen veteran in Mecca and instructed the witness to refer to him [Ahmad] only by the kunya “Abu Ammar”, *see* Deposition Tr. dated April 9, 2014 at 99-105.

The witness also attended a weekend training trip in the United Kingdom organized by Babar Ahmad which was designed, in part, to train individuals in the use of GPS and distance measuring equipment, and to groom them to later be sent to train for, and fight violent jihad abroad. *See, e.g.*, Deposition Tr. dated April 9, 2014 at 25-26, 105-116. The witness later saw, in Afghanistan, three Pakistanis who accompanied Ahmad and him on that trip. A video of the outing corroborates the witness, showing Ahmad and the witness together on film, and, among other things, showing Ahmad’s directing attendees to engage in physical exercises and to attack each other one at a time. Ahmad also instructs attendees in the use of GPS and distance measuring equipment, as described by the witness.

Babar Ahmad also directed the witness to buy GPS devices and long-range radio communication / walkie-talkie equipment, providing the witness with the funds for the purchase in U.S. dollars (which he exchanged per Ahmad’s instructions to British pounds). Ahmad also provided specific instructions on where to obtain the equipment, which the witness provided to Ahmad. *See* Deposition Tr. dated April 9, 2014 at 116-118.

Prior to sending the witness to Afghanistan, Babar Ahmad also proposed and organized a training trip to Bosnia for the witness and several other individuals. Prior to the trip, Ahmad briefed the group on mujahideen that they would meet, security precautions they should take, and equipment that they should bring on the trip. During one of the preparation sessions, Ahmad made the witness and the other participants raise their hands and take an oath of secrecy about their

trip. Ahmad indicated that there would be religious-based punishments for anyone who broke the oath. During a two week stay in Bosnia, the witness met Bosnian veterans and received training on various weapons including an AK-47, a TT pistol, an MP5, a Russian PK machine gun and RPGs (rocket propelled grenades). The witness and his travel companions also engaged in physical exercise, they were given close-quarter combat training techniques to practice, and they watched a documentary about Usama Bin Laden. *See* Deposition Tr. dated April 9, 2014 at 119-135.

Upon his return to the United Kingdom, the witness and others from the Bosnia trip were assigned further tasks by Babar Ahmad. The witness was assigned to assist with orders submitted from around the globe for recruitment and propaganda products promoting violent jihad produced or sold by Azzam Publications. For a period of time before he left for Afghanistan, the witness picked up and filled orders sent to the Azzam Publications post-office box, the key to which was given to the witness by Babar Ahmad. Babar Ahmad instructed the witness not to send materials out from the Tooting area or from the same location all the time. Payment was not accepted by credit card or wire transfers. The witness testified that he picked up and processed orders that originated from the United States and all over the world. *See* Deposition Tr. dated April 9, 2014 at 138-146.

In or about late 1998, Babar Ahmad discussed with the witness sending the witness to Afghanistan to train for violent jihad, with the intention that he serve as Ahmad's representative there, and receive additional individuals that Ahmad would send to Afghanistan for training. Ahmad stated that one of the first such individuals he would send would be the co-defendant, Syed Talha Ahsan. *See, e.g.,* Deposition Tr. dated April 9, 2014 at 18-19, 21-22:

Q: Did anybody from the United Kingdom send you the first time to training camps in Afghanistan?

A: Yes.

Q: Who was that?

A: Babar Ahmad.

....

Q: . . . what was your understanding of our role when you first went to Afghanistan for the training camps?

A: My role was to travel to Afghanistan, obtain my own training, and also facilitate the training of other people that would be coming from London, U.K.

Q: Who gave you that role?

A: Babar Ahmad.

Q: Did individuals come to Afghanistan from Babar Ahmad in the U.K.?

A: Yes.

Q: Who was the first person that you received in that role?

A: The first person I remember receiving was Talha.

See also Deposition Tr. dated April 9, 2014 at 147 (“And he told me that he wanted to send me to Afghanistan, one, to receive my own training, and two, to act as a liaison between him, between Babar Ahmad and people that manage training camps in order to facilitate the training of others that would come through him into Afghanistan.”). Babar Ahmad told the witness he would be particularly suited for the role because of his fluency in Arabic and his mastery of the Koran. *See* Deposition Tr. dated April 9, 2014 at 148.

Prior to the witness going to Afghanistan, Ahmad provided the witness with a pager to

facilitate additional, in person, meetings between Ahmad and the witness to prepare for the trip. *See id.* at 149. Ahmad provided the witness with funds for the trip and arranged for him to have a laptop pre-loaded with encryption software. *Id.* at 150-51. Babar Ahmad also discussed and arranged for the witness to learn how to use PGP encryption for coded communications, *see id.* at 150-51, so that Ahmad and the witness could send encrypted email and encrypted fax communications to each other while the witness was in Afghanistan (which is consistent with the wealth of evidence of Ahmad's extensive use of PGP encryption in the case, including PGP encryption and PGP encrypted materials found on Ahmad's computer media – including Ahmad's having encrypted *an entire drive / volume* on his computer media, *see, e.g.*, PSR ¶¶ 104-09).

Ahmad also provided the witness with detailed and encrypted instructions, on disk, about how the witness was to travel to Afghanistan through Pakistan – which is corroborated by, and entirely consistent with the similar, subsequent instructions recovered in the “Briefing.txt” document, *see* Exhibit B, which *post-dated* the witness's involvement and interaction with Ahmad while they were together in the United Kingdom.

According to the witness, the encrypted instructions Ahmad provided to him on the floppy disk “was a detailed plan of activity for my journey starting from touching down in Karachi,” including “what hotel to travel to, even how much I should pay for that journey. And then who to contact when checking in. And then there was talk about how it was I would be getting into Afghanistan, who I would be introduced to.” *Id.* at 153-54; *Cf.* PSR ¶¶ 150-52, Exhibit B (recovered “Briefing.txt” document setting forth a detailed briefing providing specific instructions on making preparations for traveling to fight in Afghanistan, arranging for travel to Afghanistan through Pakistan, and then traveling to train and fight in Afghanistan). According to the witness,

he was instructed to take a route from Karachi to Quetta and then from Quetta on to Kandahar, rather than an alternate route through Peshawar. *Id.* at 155; *Cf.* PSR ¶ 152, Exhibit B (describing route from Karachi to Kandahar via Quetta). According to the witness, Babar Ahmad also provided the name of Abu Zubair al-Haili to use as a reference. *Id.* at 156; *Cf.* PSR ¶ 152, Exhibit B (“Any problems – he should contact Mustafa Al-Kanadi, *A Z Al-Hailee* or AH.”) (emphasis added).¹

Prior to the witness going to Afghanistan, Ahmad also instructed him to obtain training in weapons and manufacturing explosives – and to try to meet with Usama bin Laden:

Q: Prior to going to Afghanistan for training, did anybody tell you to obtain any particular type of training?

A: Yes.

Q: What type of training were you told to get?

A: I was told to get general weapons training, and if it was possible, also get training in manufacturing explosives.

Q: And was somebody in the United Kingdom that gave you those instructions?

A: Yes.

Q: Who was that?

¹ Both the “Briefing.txt” and “Details.txt” documents also reference using a “Mr. Sajid” at “Apex Travel” to coordinate travel to Afghanistan via Pakistan. During the course of the investigation, British law enforcement authorities found several payments to Apex Travel by Babar Ahmad. For example, a bank statement for an account in the name of “Mr. B. Ahmad” showed £900 British pounds were “paid out” to “Apex Travel UK LTD London” on December 14, 1998. Similarly, another notation on the same bank statement in the name of “Mr. B. Ahmad” showed £245 British pounds were “paid out” to “Apex Travel UK LTD London” the following day, December 15, 1998. In addition, the investigation recovered a copy of a check drawn on a Barclays Bank account controlled by Babar Ahmad for Babar Ahmad’s Optica Import Export company. The check was written to Apex Travel UK Limited on October 14, 1999 in the amount of £350 and was signed by Babar Ahmad. *See* Exhibit E.

A: Babar Ahmad.

Q: Prior to going to Afghanistan in the United Kingdom, did anybody tell you to try to meet with any individuals in particular?

A: Yes.

Q: What did they say?

A: I was told to meet individuals in Pakistan like his cousin. I was told to meet individuals in Afghanistan like who I mentioned Nasir al-Emirati. I was also told if it was possible to meet Usama Bin Laden, also arrange a meeting with him.

Q: And who told you to do that?

A: Babar Ahmad.

Q: And you mentioned "his" cousin. Whose cousin are you referring to?

A: Babar Ahmad.

Q: So, Babar Ahmad told you to meet with Usama Bin Laden?

A: Sorry?

Q: Babar Ahmad told you to try to meet with Usama Bin Laden?

A: Yes.

See Deposition Tr. dated April 9, 2014 at 20-21; *see also id.* at 158-160:

Q: Okay. So, in addition to these instructions and materials you got on disk, did Mr. Ahmad tell you whether or not to get any particular type of training in Afghanistan?

A: Yes.

Q: And what type of training did he tell you to get?

A: There's mention of basic weapons training, but I remember specifically being told about, like, getting training in manufacturing explosives.

Q: And that's something Mr. Ahmad told you you had to do?

A: Yes.

Q: Do you recall when that was or where that was?

A: It was in the documents.

Q: Oh, okay. And by the way, on the password-protected disk, the Encyclopedia of Jihad, who gave you the password for the disk?

....

Q: In addition to being told to obtain explosives training, were you also told to try to arrange to meet with anybody in particular in Afghanistan?

A: Yes.

Q: Who?

A: I remember in the documents I was told to try and meet Usama Bin Laden.

Q: And who provided you that document?

A: Babar Ahmad.

Q: And that was on the disk as well with the instructions?

A: Yes.

Q: So, Mr. Ahmad told you to try to meet with Usama Bin Laden?

A: Yes.

The witness subsequently traveled to training camps in Afghanistan through Pakistan, pursuant to the directions provided by Babar Ahmad, and with the assistance of Ahmad's cousin in Karachi, Mohammed Naim Noor Khan. *Id.* at 161-63. In order to pay for one training camp, the witness used some of the money provided to him by Ahmad. Specifically, the witness used the money to pay the cost of an explosives course at a training camp in Afghanistan. *Id.* at 169,

172-74.

The witness subsequently saw or interacted in Afghanistan with recruits with whom he had attended the weekend trip in the United Kingdom organized by Ahmad, individuals from Tooting, and individuals who he identified that are actually referenced by name in seized documents linked to Ahmad that post-date the witness's interaction and involvement with Ahmad while they were together in the United Kingdom. The witness also interacted in Afghanistan with: (1) Syed Talha Ahsan, who, as Ahmad had indicated, was the first recruit sent by Ahmad to Afghanistan received by the witness, and (2) Andrew Ramsey – both of whom separately and independently brought to the individual in Afghanistan, encrypted communications from Ahmad, on a disk, at different times. *See id.* at 175, 187-89. The witness also made multiple attempts to communicate with Ahmad from Afghanistan by passing messages using PGP encryption, per Ahmad's instructions. *Id.* at 167-68, 169-71.

The witness saw Ahsan twice in Afghanistan, with one of those encounters being in a training camp during which the individual and Ahsan took an explosives training course together. *See id.* 174-79. The second time that the individual saw Ahsan in Afghanistan, Ahsan was ill and the individual took him to get medical care. *Id.* at 175, 187-89. While the witness and Ahsan were together the first time in Afghanistan, a Bosnia veteran that the witness had met in connection with his Ahmad-sponsored trip to Bosnia in 1998 arrived, came looking for them, and stated that their "emir" or leader – Babar Ahmad – wanted them to go with the Bosnia veteran for training at the "Khalden camp." Ahsan agreed, but the witness declined, opting to stay where he was. *Id.* at 184-87, 189-91. The witness subsequently learned that Ahsan did not go to the Khalden camp, because he saw them at the "Karga camp" instead. *Id.* at 191. The witness also subsequently

learned that Ahsan had gone to the front lines and during a retreat, “the vehicle Ahsan and others were in was being fired upon, during which someone was shot dead in the had and the blood went over Talha’s face.” *Id.* at 194. This is corroborated by Syed Talha Ahsan’s handwritten letter to his father, recovered during a search of Ahsan’s residence in 2006, in which Ahsan stated: “I have been to the land of jihad twice. I have had a brother killed right next to me, his blood drenching my entire clothes”. *See, e.g.*, Ahsan PSR ¶ 117.

The witness also testified about an incident in which he failed to follow operational security as instructed by Ahmad and he placed an unsecured telephone call to London, which not only upset Ahmad, but also prompted the temporary abandonment of a house they used in London, for fear that it had been compromised. Specifically, according to the witness, in the late summer or early fall of 1999, he and Ahsan were supposed to leave Afghanistan and return to London. The two intended to travel together to Kandahar and then find a passage over the border into Quetta, where they could make their way back to Karachi to connect with Babar Ahmad’s cousin, Mohammed Naim Noor Khan. Prior to arrival, he wanted to coordinate with Khan and let Khan know because, pursuant to customary operational security procedures provided by Ahmad, the witness had left his passport with Khan prior to going to Afghanistan. The witness, however, had trouble getting in touch with Khan and was already in Kandahar. Panicked, the witness phoned a location they used in London at Avoca Road, asking the person who answered to convey a message to Ahmad, possibly referencing Ahsan, indicating that they were en route to Karachi. *Id.* at 195-98. Upon finally meeting up with Ahmad’s cousin Khan, Khan had an encrypted communication from Ahmad for the witness, admonishing the witness for “phoning the Avoca Road address and the security risk it presented.” *Id.* at 199. Specifically, the message indicated

that the witness's actions in calling "presented a security risk to the Avoca Road itself address and it had to be cleared out." *Id.* at 200. The witness added that at the Avoca Road location he phoned that had to be "cleared out" in London, "there was a computer being used to produce . . . the video version of *In the Hearts of Green Birds*, I knew that the guys were in the process of making this video." *Id.*

The witness's testimony that Ahmad facilitated his and others' travel to Afghanistan via Pakistan, through his (Ahmad's) cousin, Mohammed Naim Noor Khan, is further corroborated by email traffic recovered between Babar Ahmad and his cousin. Specifically, emails recovered from Ahmad's computers in his office at Imperial College and on storage media (CDs) from Avoca Road uncovered coded email correspondence during the fall of 2000 and the fall of 2001 between Ahmad and his cousin, Mohammad Naim Noor Khan, that not only confirms the nature of their relationship, but also corroborates the fact that Ahmad relied upon his cousin in connection with sending recruits to Afghanistan to train and fight.

For example, emails exchanged in October 2000 between Ahmad's personal email account, "mrbee42@hotmail.com," and Mohammed Naim Noor Khan's Yahoo account, "mn_nk@yahoo.com," contained a coded conversation regarding the use of certain fighters and recruits – which they referred to as "trousers" – and Khan's difficulty in placing them, regardless of whether they came from "Taffad," "BM," or "Calvin Klein," which are believed to refer to Tooting, Bosnia and Chechnya, respectively. In the exchange, Khan later writes that after consultation with others, he may be able to place certain individuals who are not brand new.

Specifically, in an October 24, 2000 email from "mn_nk@yahoo.com" Babar Ahmad at "mrbee42@hotmail.com," Khan wrote:

Hi,

I think you didn't get my point. I told you that the market is VERY down these days. I CANNOT sell any of your cotton trousers these days whether they are of "Tafadd" make or "BM" make or "Calvin Klein" make. Let me ask the marketing manager and confirm it to you. But till then the marketing manager have asked me NOT to send any cotton trousers as their market is going very down these days. This is not the matter for our trousers specifically, but for all the big companies.

Wait for my confirmation before sending any trousers no matter whether they are of "Tafadd" or "BM" make or "Calvin Klein" make.

Please be patient, these sort of disorders are for temporarily bases.

Bye.

A reply email from "mrbee42@hotmail.com," on October 25, 2000 read: "I wish you would make yourself clear: I thought you were talking about parcels not trousers. You need to tell me as soon as possible because I have already bought one pair of trousers to send you in a couple weeks' time." A follow up email from "mrbee42@hotmail.com," later the same day (October 25, 2000) read: "Can I send you the trousers after a couple of weeks and you keep them in your wardrobe until you wear them? They are a special pair of trousers as well." An October 25, 2000 response from "mn_nk@yahoo.com" to "mrbee42@hotmail.com," stated:

I spoke to a guy other than Marketing Manager (Kishan). Kishan will be back in 4, 5 days. The guy asked me to stop this pair of trouser, but for the trousers of "Taffad" and "BM" make, he may/can arrange after speaking to Kishan as the pants of these two makes are not brand new but a little bit old and special.

Till then, please be patient as I told you that this disorder in the market is for temporarily basis.

Please check in some time in the evening. I will tell you when you can check in.

Sorry for the misunderstanding.

An October 26, 2000 follow-up email from "mn_nk@yahoo.com" to "mrbee42@hotmail.com,"

read:

I hope you have checked in by now. The guy (NOT Marketing Manager) said that you can send 'Taffad' and 'BM' trousers. But he only want to ask and confirm 100% from Kishan (who is out of town) before giving me his very FINAL answer.

About the one you have already bought, I cannot say anything. I can put it in our wardrobe but I cannot say about how long the market will remain the same.

You can also keep this trouser in stand by at your side and send it immediately when I will tell you. Please wait until Mr. Kishan comes.

A response the same date from Ahmad's personal email account, "mrbee42@hotmail.com" read:

Listen I'll wait till Kishan Kumar comes back for the other trousers, but since I have already bought them, you will have to keep them with you, as the shop won't refund them.

They are special trousers because they last a long time and it is difficult to find ones like that these days!

The witness also testified that he and Ahmad overlapped for several days at a safehouse known as the "House of Pomegranates" in Kandahar, Afghanistan, in or about January 2001, during a time when Usama Bin Laden visited this location, as did the now deceased Al-Qaida Operational Chief Abu Hafs Al Masri. *See* Deposition Tr. dated April 9, 2014 at 209-220.

The witness testified that upon arriving at the house, indeed "it may well have been right upon entering the house . . . I saw Babar Ahmad in – on the balcony in the House of Pomegranates." *Id.* at 210. Upon going upstairs to greet Ahmad, the witness testified that Ahmad "called me into a side room" and told him what kunya he (Ahmad) was currently using in Afghanistan – "Khubaib al-Pakistani." *Id.* This is entirely consistent with, and corroborated by the "briefing.txt" document, which post-dated the witness, and expressly stated to recruits – circa late 2000 – that "Your reference is ALWAYS Khubayb al-Bakistani [sic] from Lahore." PSR

¶152, *see also* Exhibit B.²

The witness testified that he and Ahmad overlapped at the House of Pomegranates for approximately five days. *Id.* at 211. The witness testified that while he and Ahmad were both at the House of Pomegranates, he also saw senior Al-Qaida leaders – including Usama bin Laden – there at the same time as well. *Id.* at 211-12. During this time, the witness believed a total of approximately twenty people were staying at the House of Pomegranates. *Id.* at 212-13.

The witness testified that in addition to the House of Pomegranates there was also a guest house across the street. The witness explained that “people that just arrived in Afghanistan just for their training would generally be in the – the other guest house,” while the “House of Pomegranates was a guest house for people that . . . served longer time in Afghanistan that were more established . . . old – more established people would be staying in the House of Pomegranates.” *Id.* at 214-15. The witness testified that at the time he and Ahmad overlapped at the House of Pomegranates, in addition to Usama bin Laden, Richard Reid and Zaccarius Moussaoui were also staying there and he “recall[ed] Moussaoui and Babar talking a lot.” *Id.*

The witness also testified that at the time he and Ahmad overlapped at the House of Pomegranates there was another individual from Tooting staying there at the same time as well – “[s]omeone who described himself as Mustafa al-Canadi. I knew him as a guy called Julaybib from the Tooting Circle.” *Id.* at 217. This is also fully consistent with, and corroborated by the “briefing.txt” document, which advised that should a recruit have “[a]ny Problems – he should contact *Mustafa Al-Kanadi*, A Z Al-Hailee or AH. Communication between him and us should

² Although the “briefing.txt” document itself does not appear to have a date, the “details.txt” document, which instructs that an individual be given the “full Aberdeen/Pak briefing” was created on December 18, 2000.

go through *Mustafa Al-Kanadi*, who will be our permanent man there.” PSR ¶152 (emphasis added), *see also* Exhibit B.

Although the evidence merely summarized in part above regarding Ahmad’s material support for the Chechen mujahideen, the Taliban and Al-Qaida is overwhelming, to this day Ahmad curiously continues to minimize, spin – and as set forth below, demonstrably lie about – certain of his conduct supporting terrorists and violent jihad. *See, e.g.*, Sageman Report at 18 (Ahmad “said he had retired from *political activities*”) (emphasis added); *see also id.* at 90 (claiming Ahmad “has a low potential for recidivism, in terms of his *political activities* on behalf of global so-called jihadi organizations.”) (same); *see also* Defendant’s Version of the Offense and Relevant Offense Conduct at 13, ¶ 56 (Ahmad “did not build or operate the Second Version of the Azzam Publications website,” but “*was aware of its existence*”) (emphasis added); *see id.* at 24, ¶ 87 (describing Ahmad’s online “Urgent Appeal for Help,” which openly solicited “the purchase and delivery of large quantities of gas masks (in tens of thousands) and NBC warfare military suits,” and “a constant supply of cash” for the Taliban as a “*news report*”) (emphasis added); *see also id.* at 30, ¶ 99 (claiming that the “Appeal to Pakistanis All Over the World” was only available for several days on a non-public Canadian server and “was never seen by any member of the public.”).

This appears to be because Ahmad has embraced a curious and ultimately false narrative that he has only ever supported “defensive jihad” in Bosnia and Chechnya, in an apparent effort to distance himself from any of his offense conduct involving his support of violent jihad in Afghanistan, where such a narrative breaks down.

This case is not about the horrors, atrocities and genocide that took place in Bosnia. The

prosecution readily agrees that the atrocities that took place in Bosnia, and the international community's collective failure to properly respond, were undeniably horrific, and no doubt had a significant impact on anyone who fought there or otherwise bore witness to, or were victimized by those events. Not everyone who fought in Bosnia, however, went on to engage in the criminal conduct that Babar Ahmad did – providing robust material support to terrorists, namely, the Chechen mujahideen, the Taliban and Al-Qaida. To the extent that Ahmad's experiences in Bosnia caused him to initially embrace a concept of "defensive jihad", and even assuming arguendo that he initially applied that mindset to Chechnya, it is apparent that he evolved to embrace a concept of offensive jihad – which is why he strains to distance himself from his offense conduct regarding Afghanistan. Simply put, up to and by the time of his arrest in 2004, the scope and significance of the fund raising, military equipment, communication equipment, lodging, training, expert advice and assistance and personnel that Babar Ahmad had provided and was providing to the Chechen mujahideen, the Taliban and Al-Qaida made him a particularly dangerous individual and this Court should be troubled by Ahmad's apparent unwillingness to show a genuine appreciation of, or demonstrate genuine remorse for, the entirety of his actions.³

Perhaps as a result of the narrative Ahmad has opted to embrace – and his unequivocally stating that he has "never been to Afghanistan in his life," *see* Sageman Report at 11 – a large portion of Ahmad's submissions do not genuinely address Ahmad's offense conduct, as Ahmad instead attempts to minimize, discredit, or entirely ignore evidence that is particularly difficult for him to explain, at least in a manner consistent with the narrative he has chosen to put forth.

³ Although the defendant's plea and admissions to date are sufficient in the government's view to trigger acceptance of responsibility under U.S.S.G. § 3E1.1, the government believes that the defendant's ongoing and false denials of other relevant conduct should be considered by the Court in fashioning an appropriate sentence pursuant to 18 U.S.S.C. §3553(a).

For example, in a weak effort to explain his extensive and highly sophisticated efforts at operational security, Ahmad falsely claims that those efforts were exclusively intended to protect him from Serbian and Russian extremists in light of his efforts in Bosnia and Chechnya – because Ahmad has not, and apparently cannot admit to his conduct supporting violent jihad in Afghanistan. *See* Defendant’s Version of Other Matters at 9 ¶ 34 (“In order to protect himself and his family from Serbian and Russian extremists or intelligence services, Mr. Ahmad utilized aliases, encryption and other computer protective measures during his involvement with Azzam Publications.”). It is undisputed that Ahmad went to great lengths to operate in secrecy, maintain operational security and cover his tracks – including his use of multiple aliases, kunyas, layered levels of post office boxes, encrypted laptops, satellite phones and other encrypted equipment, and his extensive use of PGP encryption, not only in communications but also to encrypt *entire* computer volumes and files. *See, e.g.*, PSR ¶¶ 104-09. Documentary evidence in the case, however, contains *express* references to avoiding detection by *British* authorities, not Russians or Serbians. *See, e.g.*, PSR ¶ 150, and Exhibit B (the “briefing.txt” document) (“For your OWN good, no slip-ups. Dealing with Intelligence not PCs. No telephone contact from Aberdeen. Even if life & Death. Same as phoning MI5.”). In addition, the fact that Babar Ahmad and his cousin in Pakistan, Mohammed Naim Noor Khan – who helped facilitate the travel of the witness and other recruits Ahmad sent to Afghanistan via Pakistan for training – engaged in coded communication also undermines Babar Ahmad’s false claim that the significant lengths to which he went for operational security were exclusively out of fear of Serbian and Russian extremists or Russian intelligence services.

Similarly, because doing so would apparently be inconsistent with his theme of defensive

jihad and his ongoing denials regarding his conduct in Afghanistan, Ahmad has not, and apparently cannot, admit that the “Appeal to Pakistanis All Over the World” – which, post-9/11, encouraged Pakistanis worldwide to travel to and fight against “the Crusaders” in Afghanistan, and provided detailed instructions for Pakistani nationals to obtain a Pakistani visa under false pretenses – was publicly available online on Azzam from at least late 2001 through mid 2002. Instead, Ahmad claims that this posting was only available for a matter of days on a non-public Canadian server and “was never seen by any member of the public.” *See* Defendant’s Version of the Offense at 30, ¶ 99. This claim is particularly curious as it is demonstrably false in light of publicly available information showing that the posting was not only available online from at least late 2001 through mid 2002, but it also remains publicly available to this day.

To this day, many of the Azzam Publications-related documents uncovered during the course of the investigation have been independently preserved as they existed at the time by the not-for-profit organization known as the Internet Archive. The Internet Archive is a 501(c)(3) non-profit organization that was founded to build and preserve an Internet library. Its purposes include offering permanent and searchable access for researchers, historians, scholars, and the general public to historically preserved and archived versions of websites as they existed at various dates and times. The Internet Archive maintains numerous archived versions of Azzam.com and Qoqaz.net, including in some cases, multiple web captures for the sites archived at different times on the same day.

Numerous links to publicly available, archived versions of the Azzam sites clearly show that a link to the “Appeal to Pakistanis All Over the World” was publicly available online on Azzam’s “Jihad in Afghanistan” page at various dates and times. Indeed, visiting any of the

following links and clicking on “Jihad in Afghanistan” takes visitors to a page containing a link to the “Appeal to Pakistanis All Over the World”:

[https://web.archive.org/web/20011201053843/http://azzam.com/;](https://web.archive.org/web/20011201053843/http://azzam.com/)

[https://web.archive.org/web/20011122115843/http://www.azzam.sh/;](https://web.archive.org/web/20011122115843/http://www.azzam.sh/)

<https://web.archive.org/web/20011128231135/http://www.azzam.com/>

<https://web.archive.org/web/20011201174424/http://www.azzam.com/>

<https://web.archive.org/web/20011202174537/http://www.azzam.com/>

<https://web.archive.org/web/20011212235827/http://www.azzam.com/>

<https://web.archive.org/web/20011217200114/http://www.azzam.com/>

Similarly, archived captures of the Azzam site show that the content of the “Appeal to Pakistanis” was publicly available as well. See, e.g.:

https://web.archive.org/web/*/http://66.197.135.110/~azzam/afghan/html/*

and click on the following link, six entries down:

<https://web.archive.org/web/20020622082525/http://66.197.135.110/~azzam/afghan/html/afghanarticlepakappeal.htm>.

The Internet Archive captures “snapshots” of websites through web-crawling software that captures how webpages look as they exist in a publicly-available, online format. The Internet Archive simply could not have plausibly accessed and archived these pages if they were merely sitting on a non-public Canadian server for a matter of days. Ahmad’s claim that the “Appeal to Pakistanis All Over the World” was “never seen by any member of the public” on the Azzam sites is demonstrably false – a fact which can be confirmed by the Court to this day by a simple visit to the representative links set forth above.

Indeed, a sample of some of the additional Azzam postings that were independently preserved by the Internet Archive and remain publicly available online via archive.org – that the Court can view in preserved, online form as they existed historically on the Azzam sites – includes the following:

The Urgent Appeal for Large Quantities of Gas Masks, NBC Suits and Donations

<https://web.archive.org/web/20010208120138/http://www.azzam.com/html/newsnov00.htm>

Usama Bin Laden's 1996 Declaration of War

https://web.archive.org/web/20010122062500/http://www.azzam.com/html/article_sdeclaration.htm

How Can I Train Myself for Jihad

<https://web.archive.org/web/20010407083150/http://63.249.218.164/html/articlesjihadtrain.htm>

The Islamic Ruling on the Permissibility of Martyrdom Operations

<https://web.archive.org/web/20010208144716/http://63.249.218.164/html/articlesmartyrops.htm>

The government also notes that the defendant's materials to date do not address or discuss, among other things: (1) the dozens of deleted but recovered pages of detailed recipes for manufacturing explosives and improvised explosive devices ("IEDs") that were found on Ahmad's computer media recovered from his locked office at Imperial College, *see* Exhibit G (the "explosives document") (filed under seal); and (2) the organizational chart recovered from his computer media (which was misleadingly named "Aircraft Structures.doc."), with "Mr Bee" – an alias for Babar Ahmad and consistent with Ahmad's personal email account, mrbee42@hotmail.com – prominently displayed at the top of the organization, overseeing such

activities as “Intel,” “Travel,” and “Media” (which included the “A Site” [Aberdeen/Afghanistan/Azzam] and the “C Site” [Catford/Chechnya/Qoqaz]. *See* Exhibit F (the “organizational chart”).

Ahmad’s difficulty in reconciling his theme of defensive jihad with his conduct in Afghanistan is also apparent from his motion filed on or about June 10, 2014 – a motion which, for the first time in the case, was NOT joined by his co-defendant, Syed Talha Ahsan. In essence, Babar Ahmad filed a motion asking that the Court entirely preclude certain testimony from the government’s cooperating witness – testimony that just happens to be particularly bad for Ahmad and inconsistent with his narrative and his ongoing denials regarding his conduct in connection with Afghanistan. The government intends to file a response to the motion within the time limits permitted by the local rules. Suffice it to say, however, in addition to the examples of corroboration referenced above, the Court can and should make its own assessment of the witness’s testimony and credibility by viewing the video-taped deposition and reviewing the corresponding transcript. More broadly, however, the government submits that as the Court makes its own assessment, it should consider that the witness did not over-reach in his testimony in any way. He openly acknowledged that testifying in Ahmad and Ahsan’s cases was difficult for him because Ahmad was “almost like an older brother” to him, and he appropriately viewed Ahmad and Ahsan as very different than say, Khalid Sheikh Mohammed. *See* Deposition Tr. dated April 9, 2014 at 51. The witness readily acknowledged that Ahmad and Ahsan were not involved in any operational terrorist plots or attacks, *see, e.g.*, Deposition Tr. dated April 9, 2014 at 52 – and the government has not claimed that they were. As the witness stated, “Khalid Sheikh Mohammed was involved in [the] biggest terrorist atrocity ever, 9/11. I don’t believe, to my

knowledge, Babar Ahmad is . . . as for strapping bombs to yourself and blowing up innocent civilians . . . to my knowledge Babar Ahmad or Talha aren't involved in anything – aren't suspected of [being] involved in anything – directly involved in anything like that.” *Id.* at 52; *see also* Deposition Tr. dated April 10, 2014 at 34 (witness acknowledging that Ahmad did not advocate killing civilians, blowing up planes, etc.). The government has long maintained that Babar Ahmad was not a member of Al-Qaida, but he was sympathetic to, and provided material support for, its cause. The witness did not claim otherwise. Moreover, the cross examination of the witness by counsel for Ahsan, and the fact that Syed Talha Ahsan has not joined Ahmad's motion to preclude the witness's testimony is telling as well. Insofar as the witness readily acknowledged Ahsan's less culpable conduct compared to that of Ahmad (which the government believes is appropriately reflected in the difference in their sentencing exposure), it appears that Ahsan understandably wants this Court to believe the testimony they elicited from the government's witness regarding Ahsan.

Conclusion

Babar Ahmad stands before the Court having pled guilty to conspiring to provide and providing material support to terrorists in violation of 18 U.S.C. §2339A and he has admitted that he did so intending that such support or resources be used in preparation for or in carrying out: (1) a conspiracy to kill, kidnap, maim or injure persons or damage property; or (2) the murder of U.S. nationals abroad. Overwhelming evidence in this case establishes that Ahmad was the founder, leader, organizer and manager of Azzam Publications as well as the sub-group of the Tooting Circle which focused on and materially supported violent jihad. At sentencing, in addition to relying on the testimony already elicited from the cooperating witness, the government intends to

present a multi-media presentation reviewing the conduct in the case, and also elicit testimony from expert witness Evan Kohlmann.

Ahmad's material support to the Chechen mujahideen, the Taliban and Al-Qaida were robust, far-reaching and virtually unparalleled – indeed he provided almost every single category of support set forth in the material support statute: funds; military equipment; communication equipment; lodging; training; expert advice and assistance; and personnel. According to the Azzam websites, in the article entitled “What Can I do to Help Jihad and the Mujahideen?” :

The Jihad does not only consist of one person firing a gun. It consists of a large and complex structure that includes: the one who organizes the weapons and ammunition . . . the one who looks after the sick and injured, the one who sits in the radio communications room, the one who maintains the motor vehicles, the one overseas who raises the money, the one who brings or transfers the money, the one sitting in a Western country who locates and purchases highly sophisticated equipment such as High Frequency Radios, etc. etc.

Babar Ahmad did *precisely* that, and the scope, nature, global reach and significance of the material support that Ahmad provided to the Chechen mujahideen, the Taliban and Al-Qaida is virtually unparalleled and warrants a Guidelines sentence of twenty five (25) years.

Respectfully submitted,

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CERTIFICATION

I hereby certify that on June 16, 2014, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/

STEPHEN B. REYNOLDS
ASSISTANT UNITED STATES ATTORNEY

EXHIBIT A

THE BATTLE GROUP DOCUMENT

[Necessary changes made in grammar and spelling, and for the sake of clarity]

In the coming days the United States will be deploying a large naval/ marine force to the Middle East.

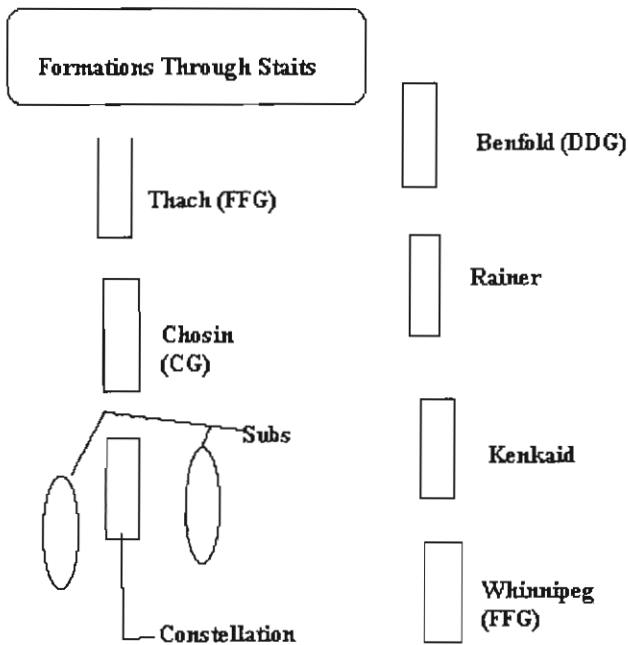
This will be a two group force: the Battle Group (BG) and the Amphibious Readiness Group (ARG) - these groups will be replacing the already deployed groups in the gulf.

The BG mission is to hold up the sanctions against Iraq, e.g. patrolling the No-Fly Zone, carry out Maritime Interception Operations (MIO) or launch strikes.

There is a possibility that the ships and submarines that are capable will carry out a strike against Afghanistan. Main targets: Usama and the Mujahideen, Taliban etc.

A two star admiral COMCRUDESRON1 (his title), a high ranking officer of the BG said that "there will be certain ships of this BG sitting off the coast of Pakistan with 'launch pads.'"

Most of the ships that are part of the BG will deploy on March 15 2001 leaving their home ports out of California and Washington State. They will meet up with the other ships that are part of the BG which are stationed in Hawaii. Their first port stop is Hawaii on March 20 2001, where some ships will load Tomahawk D missiles. The same missiles used on Afghanistan and Sudan. It has a warhead and 166 [mm?] fragment bomblets. Then the whole BG will head towards Australia. The main ship with high ranking officials will be at Sydney on April 6 2001, other ships - Melbourne, Perth, Bunbury etc. The BG will be going through the straits of Hormuz on the April 29 2001 at night, cutting off certain "infocoms" and "Emcoms" to divert their enemies on how many ships are actually coming through. This will be a night time set-up.



BG ships:

1. USS Constellation (CV64) Kitty Hawk Class carrier

Personnel: 5,500 to 6,000
Special team: onboard Explosive Ordnance Disposal team (EOD)
Mission: No-fly zone, patrol, etc

2. USS Chosin (CG-65) Ticonderoga class

Personnel: 350 to 400
Specialisation: anti-air warfare
Plus carrier escort all these ships.

3. Kinkaid (DD965) Sprvance class3

Personnel: 300 to 350
Specialisation: MIO etc

4. USS Benfold (DDG-65) Arleigh Burke class

Personnel: 300
Multi-capable ship

5. USS Thach (FFG-43) Oliver Perry class

Personnel: 150
Specialisation: Anti-Air warfare

6. HMCS Winnipid (Canada) (FFG)

Personnel: 150
Capabilities same as Thach

7. USS Rainer (AOE-7)

Personnel: 400 to 500
Ammo and fuel replenishing ship for the BG.

Each ship has a UBSS team to up hold sanctions. Onboard each ship there are two 12 men teams, 1 officer in charge, 1 senior enlisted with experience, 2nd in command, 6 man sweep team, 4 man security set-up.

Submarines:

USS Olympia (SSN-77) and USS Santa Fe (SSN 763)

Fast Attack submarines: Los Angeles class
Personnel: 150 each

The ARG:

These consist of three ships which are deploying out of homeport San Diego, March 14 2001.

1. USS BOXER (LHD9) com ship, Wasp class

Personnel: 1,500 sailors; 2,500 marines; high ranking officials abroad; also special forces, Navy Seals and Marines Special Unit

Reconnaissance ships carries lots of helos [helicopters?] all kinds.

2. USS Cleveland (LPD7), Austin class

Personnel 600 to 700 sailors and 500 marines

3. USS Harpers Ferry (LSD49), Whidbey Island class

Personnel same as Cleveland, they both carry heavy equipment, tanks, LCACS, etc

The ARG port visit will be in South-East Asia before heading to the ME. Thailand (their favourite), Singapore etc.

Mission covert ops for special forces, evacuate embassies or beach/ land assaults.

Marine train off the coast of Qatar or Jordan maybe even Saudi Arabia.

American arms: Berreta 9mm and tactical shotguns; plus 4 man Rhib team no arms connected to boat or personnel.

Canadians: same set-up, better weapons, MP5 and 9mm pistols.

For risky missions, usually done alone by Navy Seals; Vessel board search and siege teams (VBSS).

These team carry out MIO in the northern part of the Gulf.

Weakness:

They have nothing to stop a small craft with RPG etc, except their Seals' stinger missiles.

Deploy ops in Gulf 29 April - 04 October.

29th APRIL is more likely the day through the Straits. For the whole of March is tax free - a moral booster. Many sailors do not like the Gulf.

Please destroy message.

EXHIBIT B

THE “BRIEFING.TXT” DOCUMENT

briefing

Briefing

=====

Check List

~~~~~

Dates In & out - Flight Times

- 2 Months Malaris Tablets - Appropriate to environment (Boots)
- A-Z Multivitamins & Minerals for Duration
- Plasters - Assorted Waterproof, Waterproof Strip
- Germolene
- Heat Muscle Rub (Optional)
- Imodium Tablets
- Dioralyte packets (6 Packets)
- Baby Powder
- Insect Repellent (>50%) DEET Formula (3 Bottles) (YHA (Covent Garden) Field & Trek (105 Baker Street)
- Mosquito Head Net (Field & Trek)
- Single Sleeping Net (Optional (Field & Trek)
- Sun Block (Hot & Dry - maybe required)
- 1 Litre Water Bottle (Aluminium Field & Trek)
- Anti-Blister & Sorbothane
- Tough Trainers - Fabric with Ankle Support (non-waterproof Breathable)
- All-Terrain Sandals
- Smart Set of clothes for Travel
- Bag - Sports Holdall - NOT a suitcase
- Lonely Planet Pakistan (Optional)

No big Suitcases - sportsbags only.

What is the story you have given to your family?

Not allowed under any circumstances to tell them about Aberdeen.

Can not discuss with anybody except me and the Shurah

For your OWN good, no slip-ups. Dealing with Intelligence not PCs.

No telephone contact from Aberdeen. Even if life & Death. Same as phoning MI5.

Telephone contact from Pakistan to Pakistan contact number and to UK Emergency number ONLY. Not allowed to say location.

Will - list of debt, major possessions and how to dispose of them, hanging stuff like electricity bills.

Travel

~~~~~

What is your story - is it solid.

Be cautious on plane - talk quietly and inconspicuous.

Salat al-Khauf, as if asleep.

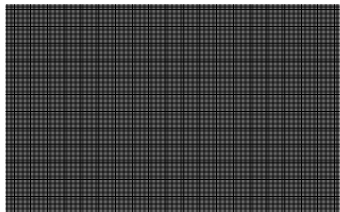
On plane, before Arrival - 2 forms :

1 Health Declaration

1 Immigration Form

Only need to be truthful as far as it has to match with your passport. (i.e. mobile number, dad's name, address, etc.)

Immigration - first someone will take health form.



briefing

Trim your beard.

At any queue - smile, be jolly act with confidence (as if your dad own's the airport) - think ahead as you go on.

Tell themn you are staying for 3 weeks - get a 6 months changeable Visa.

Apex Travel (try to get face to face 0207-437-9561) (Mr Sajid)

When putting bags through X-Ray - wait for a crowd of women and children in green channel - let bags come out first and then proceed (otherwise you look shifty and they get over-interested in your bag.)

Exchange 40 UKP EACH at the Airport ~3200 Rs - Ensure at least 3-4 100 Rs notes (Red)

As you exit Immigration - you will be mobbed, they will try to take bag from you. Be polite but firm - exit to taxi counter, ask for Taxi to Saddar - do not say which Hotel.

150-250 Rs (say you've been here before to ensure you don't get ripped off.)

As you leave airport, walk right - there will be 2-3 phone booths. Guy in shirt & tie selling phone cards.) buy one Teletips and one TeleCard EACH (about 100-120 rs each card)

Assume everyone (Stranger) is out to scam you and pick your pocket, reasonably true in Pakistan.

Saddar - 45 mins drive - before leaving airport - buy 2 1l mineral water bottles.

Tell Taxi Driver Hotel XYZ - check in (give Passport details (say one day stay), going to Lahore Tommorrow if they ask.)

2000 ~ 2500 Rs/ Night in Twin.

In Pakistan never accept the first price, always haggle.

Phone Adnan from outside phone box - NEVER hotel.

Your Qunya -

XYZ

Phone Adnan :

Say Salam (normal in Pak) and this is XYZ , arrange a get together for dinner somewhere.

There is normally a fried Chicken place near the hotel, in Paradise there is one underneath and to the left of the exit, in Sarawan there is a big one to the right of the exit.

Go to specified restaurant at specified time - follow instructions wrt to bottle of water and passwords.

Passwords:

You - Exchange & Mart

They - Suleymaniye

Carry a Mineral Water bottle by head/cap when you go to meet 1/2 full

Try to call him in evenings, if you can not reach him, try again a few hours later.

Adnan speaks English - he'll arrange all ^{briefing} stay in pak - should not be more than 2-3 days.

Pak- Shopping
~~~~~

3 Shalwar Kameez

Change into Jeans and T-Shirt when you get to hotel.

Crappy bag .

Pharmacy  
~~~~~

2 courses Anti-Biotics for Bacterial Dysentery (Blood in stool)

2 courses Flagyl Anti-Biotics for Amoebic Dysentery (Mucus in stool)

2 courses Imodium/Loperamide normal Dysentery.

ORS (Paki-Dioralite - 2 dozen packets.)

WATER
~~~~~

drink too much water - easy to get Dehydrated.  
Always have a few bottles @ flat.

Signs of Dehydration:

Headache,  
Dizziness,  
Stinging Eyes  
Dry tongue  
Yellow Urine.

Don't speak loudly in English in Flat, can talk with others about general stuff.

Brothers will arrange your documents.

Adnan and Niyaz you can trust 100%.

Adnan: 0300-922-9774  
(note in transposed manner in back of magazine)

will take Passport, Ticket, Money etc.

Can't check into hotel without Documents.

Adnan will give you a letter of reference.

To Quetta  
~~~~~

On Bus, maybe several of you - one Ameer obey him.
Take lots of cold mineral water - 15 hour Journey.

From Quetta, follow instruction for route to Kandahar.

No-one will know where you are from or ask Questions. Follow Instructions from Ameer.

Give letter of Reference to Amir of Guest House - addressed to AH.

briefing

Your reference is ALWAYS Khubayb al-Bakistani from Lahore - any probs ask for AH.

Guard Letter with life, carry so you can swallow the letter if you are pulled over and searched (you individually, not routine coach stop.)

Example stay for 4 months;

6 weeks Basic training
4 weeks Front - Very Important
Urban Warfare, etc.

Going to the Line is optional, bearing in mind the bros are not fighting Masood but an alliance of the whole world manifested in Masood. Besides, he will only be defending, rather than taking part in offensives. He should read the new section on the Students on the web-site, before going anyway. Choice is his.

Any Problems - he should contact Mustafa Al-Kanadi, A Z Al-Hailee or AH
Communication between him and us, he should go through Mustafa Al-Kanadi, who will be our permanent man there.

Remember (esp on front)-

24-7 Dhikr

Obey Amir in totality

Don't get captured (remember deal with Grenade)

Sabr:

with conditions, food, sleeping, etc. Rough - much ajr = much difficulty.

Sabr with one another - travelling difficult, mannerisms and habits.

Sabr with others - jokes, Arabs, different cultures - be tolerant but if it is serious don't get angry but make it clear that it wasn't acceptable.

You are from XYZ - Say to ALL except AH, who will know where you are from.

UK guys will know you are from UK, but deny and say we are from XYZ. Do not engage in UK based conversations, are totally ignorant of UK.

3 Oaths:

1. He will not discuss details, where, how or why anything to do with this before after & During - nothing to anyone except Shurah and me.

2. Telephone calls in Aberdeen absolutely forbidden.

3. Never disclose that from the UK.

Emergency Contact number

+44-7940-920-603 - From Pakistan only, try evenings - leave a clear voicemail and time, etc. Few Hours Notice.

Your meeting point will always be in front of Hotel XYZ.

EXHIBIT C

THE “DETAILS.TXT” DOCUMENT

details

2. The complicated matter is Tahir, who is currently in Syria. His e-mail address is (don't say his name on it) is maazamzam@hotmail.com or Tahir_Mughal@excite.com (in emergency if he don't reply to the first one). At present, he has an outbound return to Karachi on 30 December, from London. The ticket with exact flight details and dates is with AJ in the envelope I gave him last week (ask him for Tahir's ticket when you see him). The original idea was he would come back to London for a day or two WITHOUT going home, then go straight to Pakistan.

The last thing I told him was to mentally prepare himself for travel to Karachi around mid-Jan, meaning he would come back a couple of days before then. Now, here is an exact list of things that needs to be done:

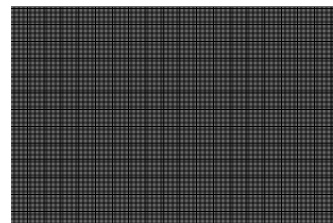
Meet AJ ASAP and do the following:

(i) Tell him to look at his Emirates ticket and give you Tahir's outbound flight details so you know when he will be arriving in Karachi. Tell Adnan by e-mail accordingly so Adnan knows when to expect him.

(ii) Tell AJ that he has to take full responsibility for the sending and briefing of Tahir since you and I will be absent. Therefore he must follow the instructions you will give him, to the letter, and not make ijtihaad on it. Tell him to take notes as you speak to him.

(iii) Give him the full Aberdeen/ Pak briefing, give him Khalid's and Adnan's phone numbers above, tell him to go to Hotel Sarwan, tell him his kunya there will be Burhan Al-Pakistani. Tell him about the airport arrival procedures, money changing, phone cards, taxi to Saddar, water bottle in one hand when meeting. General briefing on Security, saying where he is from (Pak) and where he is NOT from, Sabr taking care of his stuff etc. Tell him that No. 2 will be his first point of contact, then Jill (A Z Al-Hailee) if any problems or advice required (Jill speaks English). For matter regarding communication between him and us, he should go through Mustafa Al-Kanadi, who will be our permanent man there. Once you have given it to AJ and he has taken notes, he should repeat it to you detail by detail so you know he understands. Sometimes, it has happened before, that you give someone info at such speed that they miss important info. Don't leave any room to slip this time, do it slowly and thoroughly as if you are spoon-feeding. He should take extensive notes, then write them up in PGP encrypted form on his PGP disk.

AJ should do the following, in order:



details

a) Using your ordinary YK hotmail account (so Tahir knows it's him), e-mail him on maazamzam@hotmail.com and tell him: "Your friend asked me to tell you that the wedding date has been fixed for the same date that your ticket was changed to and currently remains fixed at. Therefore you should try your best to come back 2-3 days before that date and go straight to the groom's house where you played that Risk War Strategy game all night with your mates, laughing loudly like hooligans and louts. Tell me approximately when you will be expected at the house so I can make sure I am there to receive you. Alternatively, you can call my house from the tube station nearest to that house and I'll meet you there and take you there myself. Please confirm exactly when you will be coming. If you have difficulties getting seats, get one as soon as you can and let me know when you make it for sure, so I can change your ticket accordingly."

b) Go and visit Abid 07949-454 132 at the house and tell him that I said to put up one bro for 2-3 days just after or around Eid. Say that you will tell him the exact date and approximate time so you can obtain entry to the house for that period. Tahir will not be there so maybe Tahir can sleep in his room. Alternatively, Mustahfizz 0208-876 2147 also has a key set to the house since he will be using the PC in the daytime. All arrangements should be done with Abid, using Mustahfizz for emergency access if required. ONE MORE THING, WHEN YOU VISIT ABID, TELL HIM TWO THINGS: (I) IF THERE IS ANY PROBLEM REGARDING NEW ADDITIONS ON ABERDEEN, TO THE WEB-SITE, TELL HIM NOT TO REMOVE OR CHANGE ANYTHING TILL AFTER RAMADAN. SAY SALAH IS NOT HERE AND I CANNOT CHANGE ANYTHING TILL HE SAYS SO; (II) E-MAIL WWW.WEBSTORAGE.COM AND ASK WHEN OUR NEXT PAYMENT IS DUE FOR AZZAM.COM. ASK THEM IF IT IS ALRIGHT WE PAY IN THE FIRST WEEK OF JAN SINCE THE PERSON WHO DEALS WITH THE ACCOUNTS IS AWAY UNTIL THEN.

c) Wait for Tahir's confirmation e-mail. Do NOT tell anyone when he is coming back. If he can make it a few days before his 30 December flight, then you don't need to do anything to his ticket. If the earliest return ticket he can get is say around first or second week of Jan, then tell him to get the earliest he can and confirm the date to you. Once he confirms his date to you, IF it is after 30 December, then contact Mr. Sajid at Apex Travel on 0207-437 9561 or go to his house at a sociable time (if he is closed for Christmas and Eid) at 37 Ryfold Road, Wimbledon, London SW19 (same road as Wimbledon Mosque), say you are my friend and wanted to change a friend's outbound ticket to Karachi. To make it easier for

EXHIBIT D

THE EQUIPMENT DOCUMENTS

05 December 1999

Dear Masood,

Here is the list of things that you have been sent:

For Kevin (marked Kirsten Jones):

- 1) One Nera Worldphone with AC charger, DC cigarette lighter charger, PC/Data 9-pin cable and instruction manual. Pin is 051299. Phone numbers are 762358034/5/6/7, ISN Inmarsat Serial Number is 76EB01953DBC.
- 2) Two 30m antenna cables (one for the Internet-only phone that came in from Hassan and the other one for this new phone). I am not sure whether or not you can join the two together to make 60m.
- 3) Two spare antennas for both this phone and the other phone we sent with Hassan.
- 4) One spare battery for this phone.
- 5) One spare AC charger.
- 6) One Panasonic CF-71 Toughbook Notebook Computer with spare AC charger, DC car cigarette lighter charger, spare battery, LS-120 Superdisk drive, CD-ROM. It is a Pentium-II, 366 MHz, 128MB RAM laptop. The LS-120 drive can take both ordinary floppy disks and 120MB Super Disks. I have put the Super Disk drive inside and taken the floppy drive out. To change over, follow the instructions. Drivers etc. for the computer are at www.panasonic.com/toughbook.
- 7) 20 Super Disks.
- 8) Panasonic CF-71 Recovery CD.
- 9) Floppy disks containing recovery files and drivers.
- 10) Instruction manual for Laptop.

Software on Laptop:

- 1) Winzip 7.0 zip file creator and extractor.
- 2) Adobe Acrobat Reader 4.0. Full online documentation.
- 3) Macromedia Dreamweaver 2 web site design package. The file in the folder called DW Utils is the crack file to make this package have an infinite expiry date. You install this after the software. DW2 is the best web-authoring package in the World, but it is English only. It has FULL online documentation and tutorials. You must go through them when possible.
- 4) Macromedia Fireworks 2 web graphics package. The file in the folder called FW2 Utils is the crack file, install after software. As well as being a good graphics package, it has an EXCELLENT image optimisation feature when Exporting an image. In the Export Preview window, you can select different types of web-optimised .jpg and .gif formats, to decrease the size of your file. This is what you need to e-mail files across the Net at a slow speed: the file size must be SMALL, but acceptable quality. Using Fireworks, you can reduce a 50k image down to 6k. Any image or photos you get, optimise them with Fireworks before e-mailing them to us to put on the site. Full tutorials and online help.
- 5) Macromedia Flash 4 web animation package. The crack file is called F4Utils. This package is the best 2-D Animation package in the world for both Web and non-Web animation. Full tutorials and online help.
- 6) Cool Edit Pro 1.1 Audio Editing Package. Full online documentation.

7) Norton Anti -Virus Versi on 5.

8) PGP Desktop Security 6.02 containing PGP 6 and PGP Disk software. PGP Disk is a secure, encrypted disk system in which you can make secure virtual drives. Read the online help for more instructions. You can make as many secure drives as you want, but keep it to a minimum else you forget the passwords. I have hidden one 200MB secure drive behind a file called Opera.pgd in the Interactive Music folder. The password is exactly

Abu Bakr Aqeedah is OK

This will mount a new drive labelled S:, which you can use in Explorer like any other drive. PGP Files and keyrings are stored here. All your messages and important, secret files must be stored here. Your Outlook Express e-mail mailbox is also in here.

9) Internet Explorer 4 with Outlook Express containing PGP menus, to send and receive e-mail.

10) Netscape 4.61 web browser.

11) RealPlayer to play Real Audio and Real Video Files. Not installed but found in c:\software.

12) Real Producer Plus (we paid for this, the serial number for installation is). Using this, you can take an audio (wav file e.g.) and video files (mpeg or avi or other) and turn it into RM video format, which, if you keep the picture size like 200x200, and video resolution not more than 80kbps rate, you can reduce a 100MB video to less than 1 or 2MB. Same for audio. This way you can take an interview, audio or video, turn it into Real Audio format at your end and then send it to us. Not installed, but found in C:\software.

13) Cute FTP 3.0 for upload and download of files by ftp for web-publishing and/or downloading from web-sites or stuff that we want to send you. As e-mail cannot handle large attachments, it may be necessary to use ftp to transfer files between us. I have given info of a ftp site in the Passwords section where we can transfer files between us safely, such as image files, etc.

14) BC Wipe File Shredder which puts an option on your right-click mouse menu for any file, called Delete with Wiping. Set the option to delete 7-Pass US DoD Rotation wiping with Wipe Swap File NOT selected, to shred any important file no longer required. Deleted files MUST be recovered easily, so that is why important communications files MUST be shredded with this utility.

Important File Locations:

S: Secure Drive: Try to print out a hard copy of the documentation and make backup copies as I have already done, of the files:

1) Outlook Express: contains e-mail mailbox. You cannot access this box with its accounts until you have logged in onto the secure drive.

2) PGP Keyrings contains secring.skr and pubring.pkr. You MUST make a backup of these files and store them somewhere ELSE away from the computer.

3) Satphone contains files, numbers and instructions for e-mail and web usage

4) Passwords: contains passwords for the computer, e-mail addresses and telephone codes and unblocking codes.

E-Mail Information

1) We have set up one e-mail addresses for Kevi n' s phone. The Satphone folder shows you how to set this all up. The addresses are:

(i) lwilliam@inmarsat.francetel.ecom.fr (Main)

username lwilliam, password tog07af

(ii) tsingh@inmarsat.francetel.ecom.fr (Emergency backup)

username tsingh, password xsingh

You can also use these on Oliver's phone if you need to, but don't do it unnecessarily. Use Outlook Express to check and receive e-mail. It will automatically encrypt and decrypt for PGP.

Use Outlook Express, Send and Receive to check e-mail. Use France Telecom E-Mail in Dial up Networking, to dial in. 67# is the dialling number. The documents in Satphone explain everything. It is all configured and tested.

Security of Usage

1) Teach one or two other TRUSTWORTHY, computer-literate guys everything on here. TRUSTWORTHY means not someone who has just come for the first time from a Western country and claims to know one or two people. This person or people may be communicating with us, so we must know them well to trust them to pass messages onto the Dr or Sheikh.

2) ONLY ONLY ONLY ONLY ONLY ONLY ONLY ONLY PGP must be used in the e-mail, on ALL messages, whatever happens. If they catch on to what is happening, then they will cut your e-mail. And we WILL be able to check that this rule is being followed or not. If anyone wants to e-mail their family etc. YOU PGP us the message marked private and we will send it on to their family by post or e-mail. Do NOT let ANYONE, whoever it is, even Kevin or Sheikh, to do this. Say that this is what Salahuddin said strictly and if we don't use PGP, it will be cut.

3) We have given you a diversion e-mail address called kev1n995@email.com, (password is doctor) so that way no-one knows the real Inmarsat address. If people get to know the address, they may start e-mailing you and putting you on their e-mail lists, etc. and give you unnecessary e-mail. You just tell everyone kevin995@email.com. If anyone finds this out, you can cancel this from www.email.com (username kev1n995, password doctor) and open a new one, diverting to your account. NEVER NEVER NEVER tell the people, whoever it is, the Inmarsat address, as if that is compromised, we will be in problems as it is linked to the phone.

Important File Locations:

S: Secure Drive: Try to print out a hard copy of the documentation and make backup copies as I have already done, of the files:

1) Outlook Express: contains e-mail mailbox. You cannot access this box with its accounts until you have logged in onto the secure drive.

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4) Passwords: contains passwords for the computer, e-mail addresses and telephone codes and unblocking codes.

i) E-Mail Link

For Oliver (marked Oliver Humphrey):

- 1) 1) One Nera Worldphone with AC charger, DC cigarette lighter charger, PC/Data 9-pin cable and instruction manual. Pin is 061299, Phone numbers: 762358074/5/6/7, ISN Serial Number: 76EB013C8968.
- 2) Two 30m antenna cables (one for the Internet-only phone that came in from Hassan and the other one for this new phone). I am not sure whether or not you can join the two together to make 60m.
- 3) Two spare antennas for both this phone and the other phone we sent with Hassan.
- 4) One spare battery for this phone.
- 5) One spare AC charger.
- 6) One Panasonic CF-71 Toughbook Notebook Computer with spare AC charger, DC car cigarette lighter charger, spare battery, LS-120 Superdisk drive, CD-ROM. It is a Pentium-II, 366 MHz, 128MB RAM laptop. The LS-120 drive can take both ordinary floppy disks and 120MB Super Disks. I have put the Super Disk drive inside and taken the floppy drive out. To change over, follow the instructions.
- 7) 20 Super Disks.
- 8) Panasonic CF-71 Recovery CD.
- 9) Floppy disks containing recovery files and drivers.
- 10) Instruction manual for Laptop.

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- 2) Adobe Acrobat Reader 4.0. Full online documentation.
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- 4) Macromedia Fireworks 2 web graphics package. The file in the folder called FW2 Utils is the crack file, install after software. As well as being a good graphics package, it has an EXCELLENT image optimisation feature when exporting an image. In the Export Preview window, you can select different types of web-optimised .jpg and .gif formats, to decrease the size of your file. This is what you need to e-mail files across the Net at a slow speed: the file size must be SMALL, but acceptable quality. Using Fireworks, you can reduce a 50k image down to 6k. Any image or photos you get, optimise them with Fireworks before e-mailing them to us to put on the site. Full tutorials and online help.
- 5) Macromedia Flash 4 web animation package. The crack file is called F4Utils. This package is the best 2-D Animation package in the world for both Web and non-Web animation. Full tutorials and online help.
- 6) Cool Edit Pro 1.1 Audio Editing Package. Full online documentation.
- 7) Norton Anti-Virus Version 5.
- 8) PGP Desktop Security 6.02 containing PGP 6 and PGP Disk software. PGP Disk is a secure, encrypted disk system in which you can make secure virtual drives. Read the online help for more instructions. You can make as many secure drives as you want, but keep it to a minimum else you forget the passwords. I have hidden one 200MB secure drive behind a file called Rock.pgd in the Interactive Music folder. The

password is exactly

Sheikh Abu Musab is OK

This will mount a new drive labelled S:, which you can use in Explorer like any other drive. PGP Files and keyrings are stored here. All your messages and important, secret files must be stored here. Your Outlook Express e-mail mailbox is also in here.

9) Internet Explorer 5 with Outlook Express containing PGP menus, to send and receive e-mail. Always browse the Internet with Show Images turned OFF. As it is US\$2.50 per minute, I suggest you ONLY go to the Internet when important, such as getting driver files etc. if something goes wrong, or for communication. DON'T let people check their hotmail etc. on it as it will cost lots of money, maybe US\$20-\$30 per call or more.

10) Netscape 4.61 web browser.

11) RealPlayer to play Real Audio and Real Video Files. Not installed but found in c:\software.

12) Real Producer Plus (we paid for this, the serial number for installation is). Using this, you can take an audio (wav file e.g.) and video files (mpeg or avi or other) and turn it into RM video format, which, if you keep the picture size like 200x200, and video resolution not more than 80kbps rate, you can reduce a 100MB video to less than 1 or 2MB. Same for audio. This way you can take an interview, audio or video, turn it into Real Audio format at your end and then send it to us. Not installed, but found in C:\software.

13) Cute FTP 3.0 for upload and download of files by ftp for web-publishing and/or downloading from web-sites or stuff that we want to send you. As e-mail cannot handle large attachments, it may be necessary to use ftp to transfer files between us. I have given info of a ftp site in the Passwords section where we can transfer files between us safely, such as image files, etc.

14) BC Wipe File Shredder which puts an option on your right-click mouse menu for any file, called Delete with Wiping. Set the option to delete 7-Pass US DoD Rotation wiping with Wipe Swap File NOT selected, to shred any important file no longer required. Deleted files can be recovered easily, so that is why important communications files MUST be shredded with this utility.

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3) Satphone contains files, numbers and instructions for e-mail and web usage

4) Passwords: contains passwords for the computer, e-mail addresses and telephone codes and unblocking codes.

E-Mail Information

1) We have set up two e-mail addresses for Oliver's phone. The Satphone folder shows you how to set this all up. The addresses are:

(i) tangus@imarsat.francetelcom.fr (Main) Tell everyone oliver995@email.com.

username tangus, password s1mt6q

(ii) tsi ngh@i nmarsat. francetel ecom. fr (Emergency backup)

username tsi ngh, password xsi ngh

You can also use these on Kevin's phone if you need to, but don't do it unnecessarily. Use Outlook Express to check and receive e-mail. It will automatically encrypt and decrypt for PGP.

Use Outlook Express, Send and Receive to check e-mail. Use France Telecom E-Mail in Dial up Networking, to dial in. 67# is the dialling number. The documents in Satphone explain everything. It is all configured and tested.

Securi ty of Usage

1) Teach one or two other TRUSTWORTHY, computer-literate guys everything on here. TRUSTWORTHY means not someone who has just come for the first time from a Western country and claims to know one or two people. This person or people may be communicating with us, so we must know them well to trust them to pass messages onto the Dr or Sheikh.

2) ONLY ONLY ONLY ONLY ONLY ONLY ONLY ONLY PGP must be used in the e-mail, on ALL messages, whatever happens. If they catch on to what is happening, then they will cut your e-mail. And we WILL be able to check that this rule is being followed or not. If anyone wants to e-mail their family etc. YOU PGP us the message marked private and we will send it on to their family by post or e-mail. Do NOT let ANYONE, whoever it is, even Kevin or Sheikh, to do this. Say that this is what Salahuddin said strictly and if we don't use PGP, it will be cut.

3) We have given you a diversion e-mail address called ol1ver995@email.com (password is sheikh), so that way no-one knows the real Inmarsat address. If people get to know the address, they may start e-mailing you and putting you on their e-mail lists, etc. and give you unnecessary e-mail. You just tell everyone ol1ver995@email.com (password is sheikh). If anyone finds this out, you can cancel this from www.email.com and open a new one, diverting to your account. NEVER NEVER NEVER NEVER tell the people, whoever it is, the Inmarsat address, as if that is compromised, we will be in problems as it is linked to the phone.

EXHIBIT E

THE APEX TRAVEL DOCUMENTS

Duplicate Statement of Account

Account Name	Sortcode	Account Number	Sheet Number
MR B AHMAD	40-04-01	71359266	105

Your MIDLAND GRADUATE SERVICE 1996 details

Date	Payment Type and Details	Paid Out	In	Balance
				1739.37
13NOV98	BALANCE BROUGHT FORWARD			
18NOV98	CR DABS DIRECT BOLTON		186.82	
18NOV98	ATM CASH NATWEST NOV18 IMPERIAL COLGE	10.00		1916.19
23NOV98	CR PAID IN AT MIDLAND BANK TOOTING BROADWAY		105.00	
23NOV98	ATM CASH MIDLAND NOV21 TOOTING BWAY11	200.00		1821.19
24NOV98	CR I.C.S.T.M.		1162.72	
24NOV98	CR DABS DIRECT BOLTON		198.57	3182.48
27NOV98	CR PAID IN AT MIDLAND BANK TOOTING BROADWAY		7.00	
27NOV98	SWT SAINSBURYS 016 WIMBLEDON	16.61		3172.87
03DEC98	SO WANDSWORTH CO	160.59		
03DEC98	SO B/GAS BGS CR*BCA	55.00		2957.28
14DEC98	CR NET INTEREST TO 13DEC98		0.60	
14DEC98	ATM CASH RB SCOT DEC14 LONDON S KENSI	170.00		
14DEC98	SWT APEX TRAVEL UK LTD LONDON	900.00		1887.88
14DEC98	BALANCE CARRIED FORWARD			1887.88

NC/1

Duplicate Statement of Account

Account Name MR B AHMAD	Sortcode 40-04-01	Account Number 71359266	Sheet Number 106
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Your MIDLAND GRADUATE SERVICE 1996 details

Date	Payment Type and Details	Paid Out	In	Balance
				1887.88
14DEC98	BALANCE BROUGHT FORWARD			
15DEC98	SWT APEX TRAVEL UK LTD LONDON	245.00		
15DEC98	SWT COMPUTER INTERNET CLACTON ON SE	96.59		1546.29
18DEC98	CR I.C.S.T.M.		1162.72	2709.01
21DEC98	SWT SAINSBURYS 069 WANDSWORTH	17.48		
21DEC98	SWT SUPERSPARES TOOTING	7.36		2684.17
29DEC98	SWT HOMESTYLE 0488 TOOTING	32.97		2651.20
30DEC98	SWT SHELL GARRETT 391 WANDSWORTH	10.01		2641.19
31DEC98	SWT AMAZON.COM	14.32		2626.87
04JAN99	SO WANDSWORTH CO	160.59		
04JAN99	SO B/GAS BGS CR*BCA	55.00		
04JAN99	ATM CASH MIDLAND JAN04 S KENSINGTN I1	410.00		2001.28
05JAN99	SWT DABS DIRECT BOLTON	444.14		
05JAN99	SWT DABS DIRECT BOLTON	200.92		1356.22
06JAN99	ATM CASH NATWEST JAN06 VICTORIA 5	130.00		1226.22
07JAN99	SWT NOVATECH PORTSMOUTH	241.30		984.92
11JAN99	SWT KWIK-FIT INSURANCE UDDINGTON	113.09		871.83
14JAN99	CR NET INTEREST TO 13JAN99		0.35	872.18
14JAN99	BALANCE CARRIED FORWARD			872.18

Ncl/1



BARCLAYS

20-10-53

BLOOMSBURY & TOTTENHAM COURT ROAD BRANCH
BLOOMSBURY & CHANCERY LANE GROUP
P.O. BOX 11345, LONDON, W12 8GG

Date 12/10/99

Pay Babar Ahmad Only

Three hundred and thirty pounds

£ 390 ==

BARCLAYS BANK PLC/1561 Thomas De La Rue Limited APACS No. 9522

40-40
40-40
HSBC Bank
PO Box 2222
62 Abchurch Lane
London SE1 9DB
South Kensington

only
13/05/97

FOR AND ON BEHALF OF
OPTICA IMPORT EXPORT LIMITED

Babar Ahmad

⑈ 100005⑈ 20⑈ 1053⑈ 60713716⑈



BARCLAYS

20-10-53

BLOOMSBURY & TOTTENHAM COURT ROAD BRANCH
BLOOMSBURY & CHANCERY LANE GROUP
P.O. BOX 11345, LONDON, W12 8GG

Date 14/10/99

Pay Apex Travel OK Limited Only

Three hundred and fifty pounds

£ 350 ==

BARCLAYS BANK PLC/1561 Thomas De La Rue Limited APACS No. 9522

40-40
40-40
HSBC Bank
PO Box 2222
62 Abchurch Lane
London SE1 9DB
South Kensington

only
13/05/97

FOR AND ON BEHALF OF
OPTICA IMPORT EXPORT LIMITED

Babar Ahmad

560027

⑈ 100006⑈ 20⑈ 1053⑈ 60713716⑈

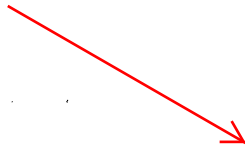


EXHIBIT F

THE ORGANIZATIONAL CHART

