



## **Regina v. Mohammad Momin Khawaja**

### **Charges in the Indictment**

- (1) That he the said Mohammed Momin Khawaja between the 13<sup>th</sup> day of July, 2003 and the 30<sup>th</sup> day of March, 2004 at or near the City of Ottawa, in the Province of Ontario, in the said Region, and at or near the City of London and the Town of Slough, in the United Kingdom, with Omar Khyam and others, did work on the development of a device to activate a detonator, with intent thereby to cause an explosion of an explosive substance likely to cause serious bodily harm or death to persons or likely to cause serious damage to property, thereby committing an indictable offence under paragraph 81(1)(a) of the *Criminal Code*, and that he committed the said indictable offence for the benefit of, at the direction of or in association with a terrorist group, namely Omar Khyam and others, thereby committing an offence under section 83.2 of the *Criminal Code*.
- (2) That Mohammad Momin Khawaja between the 13<sup>th</sup> day of July, 2003 and the 30<sup>th</sup> day of March, 2004 at or near the City of Ottawa, in the Province of Ontario, in the said Region, and at or near the City of London and the Town of Slough, in the United Kingdom, with Omar Khyam and others, did make, or have in his possession or under his care or control an explosive substance with intent thereby to enable another person, namely Omar Khyam and others, to endanger life or to cause serious damage to property, thereby committing an indictable offence under paragraph 81(1)(d) of the *Criminal Code*, and that he committed the said indictable offence for the benefit of, at the direction of or in association with a terrorist group, namely Omar Khyam and others, thereby committing an offence under section 83.2 of the *Criminal Code*.
- (3) That Mohammad Momin Khawaja between the 12<sup>th</sup> day of January, 2002 and the 30<sup>th</sup> day of March, 2004, at or near the City of Ottawa, in the Province of Ontario, in the said Region, and in Pakistan knowingly participated in or contributed to activity of a terrorist group, namely Omar Khyam and others for the purpose of enhancing the ability of the terrorist group to facilitate or carry out terrorist activity, as defined in section 83.01(1), by receiving training, within the meaning of paragraph 83.18(3)(a) of the *Criminal Code*, and did thereby commit an offence under paragraph 83.18(1) of the *Criminal Code*.
- (4) That Mohammad Momin Khawaja between the 12<sup>th</sup> day of January, 2003 and the 30<sup>th</sup> day of March, 2004, at or near the City of Ottawa, in the Province of Ontario, in the said Region, and at or near the City of London and the Town of Slough, in the United Kingdom, with Omar Khyam and others, did knowingly instruct Zenab Armandpisheh to open a bank account and conduct financial transactions on his behalf for the benefit of



a terrorist group, namely Omar Khyam and others, for the purpose of enhancing the ability of the said terrorist group to facilitate or carry out a terrorist activity, as defined in section 83.01(1), thereby committing an offence under subsection 83.21(1) of the *Criminal Code*.

- (5) That Mohammad Momin Khawaja between the 1<sup>st</sup> day of September, 2002 and the 30<sup>th</sup> day of March, 2004, at or near the City of Ottawa, in the Province of Ontario, in the said Region, and at or near the City of London and the Town of Slough, in the United Kingdom and in Pakistan, with Omar Khyam and others, did provide, invite a person to provide, and make available property and financial services, to Omar Khyam, Mohammed Junaid Babar, Anthony Garcia, an individual known as Salahuddin Amin (aka Khalid), and others, intending or knowing that they would be used, in whole or in part, for the purpose of facilitating or carrying out terrorist activity, as defined in section 83.01(1), or for the purpose of benefiting the said Omar Khyam, Mohammed Junaid Babar, Anthony Garcia, Salahuddin Amin (aka Khalid), and others who were facilitating or carrying out terrorist activity, thereby committing an offence under section 83.03(a) of the *Criminal Code*.
- 6) That Mohammad Momin Khawaja on or between the 12<sup>th</sup> day of January, 2002 and the 30<sup>th</sup> day of March, 2004, at or near the City of Ottawa, in the Province of Ontario and at or near the City of London and the Town of Slough in the United Kingdom, did knowingly participate in or contribute to, directly or indirectly, an activity of a terrorist group, namely Omar Khyam and others, for the purpose of enhancing the ability of a terrorist group to facilitate or carry out a terrorist activity, as defined in section 83.01(1) of the *Criminal Code*, namely participating in dialogue, meetings, or exchanges of information relating to the development of an explosive device intended to endanger life or cause serious damage to property, thereby committing an indictable offence, contrary to section 83.18 of the *Criminal Code*.
- 7) That Mohammad Momin Khawaja on or between the 12<sup>th</sup> day of January, 2002 and the 30<sup>th</sup> day of March, 2004, at or near the City of Ottawa, in the Province of Ontario, and at or near the City of London and the Town of Slough, in the United Kingdom and in Pakistan, did knowingly facilitate a terrorist activity, as defined in section 83.01(1) of the *Criminal Code*, thus committing an indictable offence contrary to section 83.19 of the *Criminal Code*.