



U.S. DISTRICT COURT
DISTRICT OF IDAHO

OCT 17 2003

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STATE AND DISTRICT OF IDAHO
BOISE, IDAHO

UNITED STATES OF AMERICA)
v.)
SAMI OMAR AL-HUSSAYEN)


Case No. 03-048-C-EJL

AFFIDAVIT

I, Mary Martin, the undersigned, being duly sworn,
depose and state as follows:

I am a Special Agent of the FBI for fifteen (15)
years and have been involved in multiple investigations
involving crimes under Title 18 of the United States Code.
This Affidavit is based upon facts acquired by fellow FBI
Special Agent William R. Long and other law enforcement
officials pertaining to this investigation. On October 17,
2003, Special Agent William R. Long advised your affiant of the
following:

1) Long is a Special Agent with the Federal Bureau
of Investigation (FBI) currently assigned to the Coeur d'Alene,
Idaho Resident Agency, within the FBI's Salt Lake City
Division. He has been a Special Agent with the FBI for over 14
years. Special Agent Long is experienced and has received



1 training in the investigation of violations of federal law,
2 including but not limited to, Title 18, United States Code, and
3 Title 21, United States Code. Special Agent Long has extensive
4 experience in the use of standard investigative techniques
5 including, but not limited to, the interviewing of witnesses,
6 obtaining and review of business, financial, and communication
7 records, execution of search warrants, visual surveillance,
8 court ordered electronic surveillance, development and use of
9 informants and cooperating witnesses, grand jury investiga-
10 tions, and the making of arrests. Special Agent Long has
11 testified in state and federal court on numerous occasions
12 during his career.

13 2) Since 1998, Special Agent Long has specialized in
14 the investigation of domestic terrorism matters.

15 3) Since 2001, Special Agent Long has become
16 experienced and received specialized training in the areas of
17 international terrorism and counterterrorism. This experience
18 includes receiving specialized training in these areas offered
19 by the United States Department of Justice, the FBI, and other
20 agencies.

21 4) Special Agent Long is currently a member of the
22 Inland Northwest Joint Terrorism Task Force (INJTTF) and as
23 such, works alongside other federal, state, and local law
24 enforcement officers, including agents of the United States
25 Bureau of Immigration and Customs Enforcement.

26 5) On February 13, 2003, an indictment was filed in
27 the United States District Court for the District of Idaho
28 against Sami Omar Al-Hussayen alleging violations of Title 18,

1 United States Code, §§ 1001(a)(1) and (2), and 3238 - False
2 Statements to the United States; and Title 18, United States
3 Code, §§ 1546(a), 3237 and 3238 - Visa Fraud. Currently,
4 Special Agent Long and other agents are involved in a
5 continuing investigation of Sami Omar Al-Hussayen and his
6 associates regarding matters related to international
7 terrorism. During the course of this investigation, Special
8 Agent Long and other agents have developed information
9 regarding the close association between AL-Hussayen and Saleh
10 Abdulaziz Al-Kraida.

11 6) On February 26, 2003, Special Agent Long, Joint
12 Terrorism Task Force Detective L. Richard Fairbanks, and
13 Immigration and Naturalization Service Special Agent James I.
14 Sheperd interviewed Saleh Abdulaziz Al-Kraida at his residence
15 in Moscow, Idaho. During the interview, Al-Kraida provided
16 significant information regarding the AL-Hussayen investigation
17 to the agents, including the following:

18 a) That Al-Kraida is a citizen of Saudi
19 Arabia and has entered the United States for the purpose of
20 obtaining his Masters Degree in Agricultural Engineering at the
21 University of Idaho.

22 b) That Al-Kraida is personally acquainted
23 with Sami Omar Al-Hussayen and has almost daily contact with
24 Al-Hussayen.

25 c) That Al-Hussayen, Al-Kraida, and other
26 associates regularly meet at an apartment in Moscow, Idaho,
27 known as "Almultaqa." In Arabic, Almultaqa means "the gathering
28

1 place." Almultaqa is normally used for dinners and social
2 events among associates of Al-Hussayen.

3 d) That there is a computer and a credit
4 card sales machine located at Almultaqa.

5 e) That Al-Hussayen used to sell books,
6 tapes, magazines, and other items via the computer or telephone
7 from the Almultaqa location.

8 f) That the profits from these sales were
9 for Islamic charities, including the Islamic Assembly of North
10 America.

11 g) That the sales of these items stopped
12 shortly after September 11, 2001.

13 h) That many of these books, tapes, and
14 magazines contained Islamic extremist messages. He stated that
15 extremist Islamic views include the use of violence against
16 those who do not convert to Islam.

17 i) That Sheikhs Safar Al-Hawali and Salman
18 Al-Ouda wrote, published, and recorded many of the tapes,
19 books, and magazines containing extremist messages, sold by Al-
20 Hussayen at Almultaqa.

21 j) That no gatherings occurred at
22 Almultaqa for three or four months after September 11, 2001.
23 The meetings prior to September 11, 2001, involved discussions
24 which Al-Kraida now considers to be extremist. Al-Kraida
25 believed that the meetings and the items sold at Almultaqa
26 would have invited suspicion by the FBI or other law
27 enforcement authorities, due to the extreme nature of the
28 content. Many of the extremist ideas discussed at Almultaqa

1 originated with Sheikhs Al-Hawali and Al-Ouda. When asked to
2 rate how extreme Sheikhs Al-Hawali and Al-Ouda are, Al-Kraida
3 rated them a "B-plus," with an "A" being the most extreme.

4 k) That Sami Omar Al-Hussayen was involved
5 personally with the Islamic Assembly in North America (IANA)
6 and attended IANA conferences in the past.

7 l) That Al-Hussayen then spoke about those
8 conferences to members of the mosque in Moscow, Idaho during
9 lectures and meetings.

10 m) That in the past, representatives from
11 the Global Relief Foundation (GRF), including persons from
12 Iraq, Saudi Arabia, and Kuwait, had visited the mosque in
13 Moscow, Idaho to collect donations.


14 n) That this visit by GRF representatives
15 was arranged by Abduhl Rahman Al-Jugheman, a close associate of
16 Sami Omar Al-Hussayen.

17 o) That donations had also been collected
18 at the mosque in Moscow, Idaho for the "Help the Needy"
19 organization.

20 p) Al-Kraida also provided other
21 information about Sami Omar Al-Hussayen, his associates, and
22 personal information about himself.

23 q) During the interview of Al-Kraida, Al-
24 Kraida told investigating agents that he intended to return to
25 Saudi Arabia upon his graduation from the University of Idaho.

26 7) The FBI is currently investigating the Islamic
27 Assembly of North America (IANA) regarding suspected ties to
28 international terrorism.



1 8) On February 26, 2003, the FBI executed a search
2 warrant on the offices of the "Help the Needy" (HTN)
3 organization in Syracuse, New York. That continuing
4 investigation involves, in part, alleged violations of the
5 Iraqi Embargo by members of HTN.

6 9) The Global Relief Foundation has been designated by
7 the US Department of Treasury, Office of Foreign Asset Control,
8 as an organization supporting international terrorism.

9 10) The investigation of Sami Omar Al-Hussayen has
10 revealed that Sheikhs Al-Ouda and Al-Hawali have direct
11 association with Usama Bin Laden. Suspected ties to the Al
12 Qaida terrorist organization are being investigated by the FBI.

13 11) On October 16, 2003, United States Bureau of
14 Immigration and Customs Enforcement Special Agent Jeffrey L.
15 Wolstenholme, acting in his official capacity as an Immigration
16 officer, contacted the University of Idaho concerning the
17 student status of Al-Kraida. He learned that Al-Kraida has
18 completed his masters degree requirements. He has requested
19 and received from the University a "letter of completion"
20 regarding his degree requirements. Al-Kraida appeared in
21 person at University offices during the past week to request
22 this letter. Al-Kraida told University officials that he
23 intends to leave the United States prior to graduation
24 ceremonies scheduled in December, 2003. Further, University
25 officials confirmed that Al-Kraida vacated his apartment in
26 University housing on September 30, 2003. He left a forwarding
27 address of Post Office Box 3103, Moscow, Idaho.

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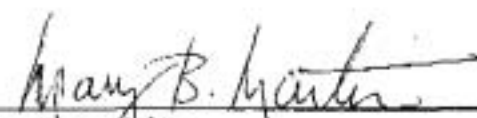


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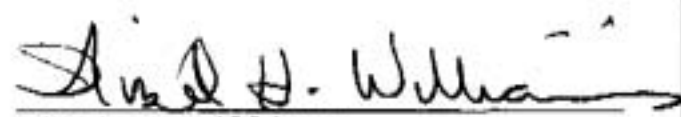
The records of the United States Bureau of Immigration and Customs Enforcement do not reflect that Al-Kraida has yet left the United States on an international commercial flight.

12) Due to Al-Kraida's admitted involvement with the defendant, Sami Omar Al-Hussayen, Al-Kraida is believed to be in possession of information germane to this matter which will be crucial to the prosecution. It is believed that if Al-Kraida travels to Saudi Arabia the United States government will be unable to secure his presence at trial via subpoena.

Respectfully submitted,


Mary Martin
Federal Bureau of Investigation
Boise, Idaho

Subscribed and sworn to before me this 17 day of October, 2003.


Mikel H. Williams
United States Magistrate Judge