



AFFIDAVIT

I, Robert Pertuso, Special Agent, Federal Bureau of Investigation (FBI),
Detroit, Michigan, being duly sworn state:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed for approximately twenty-four years. I am presently assigned to the Detroit Field Office, specifically to the Joint Terrorism Task Force (JTTF). I am also assigned as the Detroit Field Office case agent for the investigation concerning the bombing of the World Trade Center, which occurred in New York, New York on September 11, 2001.

2. During the course of this investigation, the FBI has developed and compiled a list of suspects, potential associates of the suspects, and potential witnesses relating to the bombing. This list is based upon numerous resources available to the United States Government. One of these individuals was identified as Nabil Al-Marabh.

3. On September 18th, 2001, JTTF agents attempted to contact Nabil Al-Marabh at [REDACTED], Detroit, Michigan. Agents observed the name "Nabil Al-Marabh" on the mail box directly outside of the residence. Agents knocked and announced their presence and one of the occupants of this residence, Karim Koubriti invited the agents inside premises. Upon entering this residence, agents conducted a protective sweep and located two other persons in the residence, identified as Ahmed Hannan and Farouk Ali-Haimoud. All three persons present were asked whether they were acquainted with and knew the whereabouts of Al-Marabh. All three persons replied



that they did not know him. When asked about the name on the mailbox, Koubriti replied that they had only lived there for two weeks and that Al-Marabh may have previously resided at their residence.

4. During this sweep, agents observed, in plain view, the following items: two Skychef Detroit Metropolitan Airport identification badges, one in the name of Karim Koubriti, and the second one in the name of Ahmed Hannan.

5. Hannan and Koubriti were questioned concerning their employment, and they each responded that they worked for Technicolor, Livonia, Michigan. When agents confronted them with the Skychef DTW identification badges, they said that they were previously employed at this business.

6. Agents then requested consent to search these premises from Koubriti, who indicated that the apartment was his. Koubriti thereafter provided a written consent to the agents. Agents then began the search in one of the bedrooms of the apartment. Within minutes of initiating the search, Koubriti advised the agents that there were false documents located within the room being searched. Koubriti then directed agents to the location of these documents which were contained within a desk drawer beneath some video tapes. These documents are described as follows:

a. "World Service Authority" passport in the name of Michael Saisa, date of birth [REDACTED].

b. United States Social Security Administration card in the name of Michael Saisa, number [REDACTED].



- c. United States Immigration form I-94, admission number [REDACTED]
- d. United States visa, issued to Michael Saisa.
- e. United States Immigration Service alien identification card, number [REDACTED]

7. A United States Immigration and Naturalization Service (INS) Agent, assigned to the JTTF, confirmed that items c and e, above were fraudulent. A United States Department of State, Diplomatic Security Service agent assigned to the JTTF, also confirmed that item d, above, is fraudulent.

8. Koubriti advised agents that all of the above documents were fraudulent and belonged to Saisa, who previously resided at his residence. Koubriti advised agents that he did not know Saisa's current whereabouts, but was asked to hold these documents for him.

9. During the search, agents also observed a day planner which contained notations in Arabic. Some of these notations related to the "American base in Turkey;" the "American foreign minister;" and "Alia Airport," Jordan. The day planner also contained handwritten sketches of what appeared to be a diagram of an airport flight line, to include aircraft and runways.

10. Ahmed Hannan is described as an Arab male, date of birth August 1, 1968, height 5'8", 160 pounds, and is a resident alien.

11. Karim Koubriti is described as an Arab male, date of birth August 25, 1978, height 5'11", 180 pounds, and is a resident alien.



12. Farouk Ali-Haimoud is described as an Arab male, date of birth July 23, 1980, 6', 115 pounds, and is a resident alien.

Based on the above, affiant believes probable cause exists that evidence of violations of Title 18, United States Code, Sections 1028 (a) (4); 1546; and 371, will be located at [REDACTED] Detroit, Michigan, and the garage located at the rear of the home. That evidence will include, but is not limited, to hard-copy documents and computer stored and generated records.


Affiant further believes there is probable cause to believe that on or about September 17, 2001, Ahmed Hannan, Karim Koubriti, and Farouk Ali-Haimoud did willfully and unlawfully combine, conspire and agree together.

- i. to violate Title 18, United States Code, Section 1028 (a) (4), by knowingly possessing an identification document (other than one issued lawfully for the use of the possessors) or a false identification document, with the intent such document be used to defraud the United States; and
- ii. to violate Title 18, United States Code, Section 1546, by possessing any such visa, permit, border crossing card, alien registration receipt card, or other document prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States, knowing it to be forged, counterfeited, altered or falsely made, or to have been procured by means of any false claim



or statement, or to have been otherwise procured by fraud or
unlawfully obtained;

in violation of Title 18, United States Code and 371.



ROBERT PERTUSO
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me
this 18th day of September, 2001.



UNITED STATES MAGISTRATE JUDGE