



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

Ahmad Ibrahim Al-Ahmad, aka
Ahmed Alahmedalabdaloklah, aka
Ahmed Hassan Farhan, aka
Ahmad Ibrahim, aka
Ahmad Ebrahim, and aka
Ahmed Hassan Farhan,
Defendant.

CR-12-001263-PHX-NVW (LoA)

**SUPERSEDING
INDICTMENT**

VIO: 18 U.S.C. §§ 2332a(a)(1) and (3)
(Conspiracy to Use a Weapon of
Mass Destruction)
Count 1

18 U.S.C. §§ 844(f)(1), (2) and (n)
(Conspiracy to Maliciously Damage
or Destroy U.S. Government
Property by Means of an Explosive)
Count 2

18 U.S.C. §§ 924(c)(1)(A) and
(B)(ii) and 2
(Possession of a Destructive Device
During a Crime of Violence and
Aiding and Abetting)
Count 3

18 U.S.C. § 924(o)
(Conspiracy to Possess a
Destructive Device During a
Crime of Violence)
Count 4

18 U.S.C. § 2332(b)(2)
(Conspiracy to Commit
Extraterritorial Murder of a United
States National)
Count 5

18 U.S.C. § 2339A
(Providing Material Support to
Terrorists)
Count 6

Forfeiture Allegation

1 THE GRAND JURY CHARGES:

2 At all times material to this indictment, within the District of Arizona and
3 elsewhere:

4 COUNT 1

5 (Conspiracy to Use a Weapon of Mass Destruction)

6 1. Certain component parts used in Improvised Explosive Devices (IED's), employed
7 against U.S military personnel and U.S. military vehicles in Iraq, and used in furtherance
8 of the charges contained in this Indictment were originally manufactured by a company
9 headquartered in the United States, in the District of Arizona, and traveled in interstate or
10 foreign commerce. Therefore, pursuant to Title 18, United States Code, Section 3237
11 jurisdiction is within the venue of the United States District Court for the District of
12 Arizona. Additionally, the acts referred to in this Indictment were committed in Iraq and
13 elsewhere outside of the United States, but within the extraterritorial jurisdiction of the
14 United States and, therefore, pursuant to Title 18, United States Code, Section 3238,
15 within the venue of the United States District Court for the District of Arizona.

16 2. The defendant in this case is AHMAD IBRAHIM AL-AHMAD, a Syrian national,
17 also known as Ahmed Alahmedalabdaloklah, Ahmed Hassan Farhan, Ahmad Ibrahim,
18 Ahmad Ebrahim, and Ahmed Hassan Farhan, hereinafter AHMAD IBRAHIM AL-
19 AHMAD.

20 3. Beginning in or about January, 2005 and continuing to on or about July, 2010, in Iraq
21 and elsewhere outside of the United States, defendant, AHMAD IBRAHIM AL-
22 AHMAD, did knowingly combine, conspire, confederate, and agree together and with
23 other persons, both known and unknown to the grand jury, without lawful authority, to
24 use a weapon of mass destruction, that is, a destructive device, against nationals of the
25 United States, while such nationals were outside the United States and against property
26 that was owned, leased and used by the United States outside the United States.

27 4. In furtherance of the aforesaid conspiracy and to accomplish the objects thereof,
28

1 defendant, AHMAD IBRAHIM AL-AHMAD, together with his co-conspirators, both
2 known and unknown to the Grand Jury, committed, among others, the following overt
3 acts:

4 a. Beginning in or about January, 2005 and continuing to on or about July,
5 2010, AHMAD IBRAHIM AL-AHMAD procured component parts for wireless
6 initiation systems to be used in radio-controlled improvised explosive devices (IEDs)
7 including from, but not limited to, a company headquartered in the District of Arizona.

8 b. In and before August 2006, defendant, AHMAD IBRAHIM AL-AHMAD
9 utilized a house located at 50 Omar Street, Baghdad, Iraq, to manufacture parts for
10 wireless initiation systems to be used in radio-controlled IEDs which were used to target
11 U.S. military personnel and U.S. military vehicles in Iraq.

12 c. In and before August 2006, AHMAD IBRAHIM AL-AHMAD designed
13 Dual Tone Multi Frequency (DTMF) decoder custom circuit boards which were utilized
14 in radio-controlled IEDs that were used to target U.S. military personnel and U.S.
15 military vehicles in Iraq.

16 d. Beginning in or about January, 2005 and continuing to on or about July,
17 2010, Ahmad Ibrahim Al-Ahmad communicated with coconspirators, both known and
18 unknown, regarding attacks against Americans in Iraq.

19 e. Beginning in or about January, 2005 and continuing to on or about July,
20 2010, defendant, AHMAD IBRAHIM AL-AHMAD, supplied component parts to
21 members and associates of the 1920 Revolution Brigades, an Iraqi insurgent group.
22 Those parts were then used in improvised explosive devices (IEDs) that were employed
23 against United States military personnel and U.S. military vehicles in Iraq. Unknown
24 coconspirators of defendant, AHMAD IBRAHIM AL-AHMAD, then employed the
25 component parts against U.S. military personnel including, but not limited to the
26 following:

27 i. On April 6, 2007, in the outskirts of southern Baghdad, near
28

1 Baghdad International Airport, three U.S. soldiers were killed in action by a
2 cellular phone initiated IED. The IED initiator used in this incident included a
3 DTMF custom circuit that matched three circuits recovered from 50 Omar Street,
4 Baghdad, Iraq in August 2006.

5 ii. On May 14, 2007, in northern Baghdad, approximately one-half mile
6 from the 50 Omar Street, Baghdad, Iraq, one U.S. soldier was killed in action and
7 four wounded in action by a cellular phone initiated IED. The IED electronic
8 switch used in this incident included a DTMF custom circuit that was very similar
9 to three custom circuits recovered from 50 Omar Street, Baghdad, Iraq in August
10 2006

11 All in violation of Title 18, United States Code, Section 2332a(a)(1) and (3).

12 **COUNT TWO**

13 (Conspiracy to Maliciously Damage or

14 Destroy U.S. Government Property by Means of an Explosive)

15 1. Paragraphs 1 through 4 of Count One of this Indictment are hereby incorporated
16 by reference as if fully re-alleged and restated herein.

17 2. Beginning in or about January, 2005 and continuing to on or about July, 2010, in
18 Iraq and elsewhere outside of the United States, defendant, AHMAD IBRAHIM AL-
19 AHMAD, did knowingly combine, conspire, confederate, and agree together and with
20 other persons, both known and unknown to the grand jury, to maliciously damage,
21 destroy, attempt to damage, attempt to destroy, vehicles, used by the United States
22 Military in Iraq, in whole and in part owned, or possessed by the United States
23 Department of Defense, a department of the United States) by means of explosives.

24 All in violation of Title 18, United States Code, Section 844(f)(1), (2) and (n).

COUNT THREE

(Possession of a Destructive Device During a Crime
of Violence and Aiding and Abetting)

1. Paragraphs 1 through 4 of Count One of this Indictment are hereby incorporated by reference as if fully re-alleged and restated herein.

2. Beginning in or about January, 2005 and continuing to on or about July, 2010, in Iraq and elsewhere outside of the United States, defendant, AHMAD IBRAHIM AL-AHMAD, aided and abetted other persons, both known and unknown to the grand jury, to knowingly possess a firearm, that is, a destructive device, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, Conspiracy to Use a Weapon of Mass Destruction, as set forth in Count One of this Indictment and Conspiracy to Maliciously Damage or Destroy U.S. Government Property by Means of an Explosive, as set forth in Count Two of this Indictment.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A) and (B)(ii) and 2.

COUNT FOUR

(Conspiracy to Possess a Destructive Device During a Crime of Violence)

1. Paragraphs 1 through 4 of Count One of this Indictment are hereby incorporated by reference as if fully re-alleged and restated herein.

2. Beginning in or about January, 2005 and continuing to on or about July, 2010, in Iraq and elsewhere outside of the United States, defendant, AHMAD IBRAHIM AL-AHMAD, did knowingly combine, conspire, confederate, and agree together and with other persons, both known and unknown to the grand jury to commit an offense under Title 18, United States Code, Section 924(c), that is, to possess a firearm, that is, a destructive device, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Conspiracy to Use a Weapon of Mass Destruction, as set forth in Count One of this Indictment, and Conspiracy to Maliciously

1 Damage or Destroy U.S. Government Property by Means of an Explosive, as set forth in
2 Count Two of this Indictment.

3 All in violation of Title 18, United States Code, Section 924(o).

4 **COUNT FIVE**

5 (Conspiracy to Commit Extraterritorial Murder of a United States National)

- 6 1. Paragraphs 1 through 4 of Count One of this Indictment are hereby
7 incorporated by reference as if fully re-alleged and restated herein.
- 8 2. Beginning in or about January, 2005 and continuing to on or about July, 2010,
9 in Iraq and elsewhere outside of the United States, defendant, AHMAD
10 IBRAHIM AL-AHMAD, and others both known and unknown, did knowingly
11 combine, conspire, confederate and agree together and with other persons to
12 kill a national of the United States while such national was outside the United
13 States, with Malice aforethought.

14 All in violation of Title 18, United States Code, Section 2332(b)(2).

15 **COUNT SIX**

16 (Providing Material Support to Terrorists)

- 17 1. Paragraphs 1 through 4 of Count One of this Indictment are hereby incorporated
18 by reference as if fully re-alleged and restated herein.
- 19 2. Beginning in or about January, 2005 and continuing to on or about July, 2010, in
20 Iraq and elsewhere outside of the United States, defendant, AHMAD IBRAHIM AL-
21 AHMAD, provided material support or resources knowing and intending that the support
22 was to be used in preparation for and in carrying out a violation of Title 18, United States
23 Code, Section 2332(b)(2) (conspiracy to kill a United States national).

24 All in violation of Title 18, United States Code, Section 2339A.

25 **FORFEITURE ALLEGATION**

- 26 1. The allegations contained in Counts One through Six of this Indictment are hereby
27 re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant
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1 to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code,
2 Section 2461(c).

3 2. Upon conviction of the offenses set forth in this Indictment, defendant, Ahmad
4 Ibrahim Al-Ahmad, shall forfeit to the United States of America, pursuant to Title 18,
5 United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section
6 2461(c), any property, real or personal, which constitutes or is derived from proceeds
7 traceable to the offense.

8 3. If any of the property described above, as a result of any act or omission of the
9 defendant:

- 10 a. cannot be located upon the exercise of due diligence;
- 11 b. has been transferred or sold to, or deposited with, a third party;
- 12 c. has been placed beyond the jurisdiction of the court;
- 13 d. has been substantially diminished in value; or
- 14 e. has been commingled with other property which cannot be divided without
15 difficulty,

16 the United States of America shall be entitled to forfeiture of substitute property pursuant
17 to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States
18 Code, Section 2461(c).

19 All pursuant to Title 18 United States Code, Section 981(a)(1)(C) and Title 28
20 United States Code, Section 2461(c).

21 A TRUE BILL

22 /s/

23 FOREPERSON OF THE GRAND JURY

Date: August 12, 2014

24 JOHN S. LEONARDO
25 United States Attorney
District of Arizona

26 /s/

27 DAVID A. PIMSNER
28 Assistant U.S. Attorney