



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

*United States Courts  
Southern District of Texas  
FILED  
AUG - 8 2006  
Michael N. Milby, Clerk*

UNITED STATES OF AMERICA

v.

RONALD ALLEN GRECUA, SR.

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CRIMINAL NO. H-05-257-S

**SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES THAT:

**I. Introduction**

At all times material to this superseding indictment:

1. On October 8, 1999, Al-Qaeda was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, and has been re-designated every two years thereafter.

**II. Definition**

2. The term “material support or resources” is defined in §2339A (b)(1) as “any property, tangible or intangible, or service, including currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safehouses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives,

personnel (1 or more individuals who may be or include oneself), and transportation, except medicine or religious materials.”

**COUNT ONE**

Beginning on or about April 27, 2005, and continuing to May 20, 2005, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendant,

**RONALD ALLEN GRECULA, SR.,**

did knowingly attempt to provide material support and resources to a designated foreign terrorist organization, namely; Al -Qaeda.

In violation of Title 18, United States Code, Sections 2339B and 2.

**COUNT TWO**

Beginning on or about July 2002, and continuing to May 2005, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendant,

**RONALD ALLEN GRECULA, SR.,**

together with persons known and unknown to the Grand Jury, did unlawfully, knowingly and intentionally agree, conspire and confederate with another to commit an offense defined in Title 21, United States Code, Section 841(a)(1), that is, to distribute a controlled substance. The overall scope of the conspiracy

involved less than (100) grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C) and 846.

### **III. Overt Acts**

1. On or about July 2002, Ronald Allen Grecula, Sr. ("Grecula") and the confidential source ("CS") met in Pike County, Pennsylvania.
2. Between July 2002 and December 2002, Grecula and the CS discussed Grecula gaining custody of his children from his estranged wife, Monique Grecula, by either having her killed, or arrested with drugs.
3. Between July 2002 and December 2002, Grecula explained to the CS how he would be willing to build bombs for anti-American groups, to include Al-Qaeda.
4. On or about December 8, 2002, Grecula sent a check for \$2800 to the CS's sister, as a down payment for the CS to purchase heroin to be used in the plan to set up Monique Grecula.
5. On or about December 13, 2002, the CS was deported from the Pike County, Pennsylvania to Georgetown, Guyana.
6. On or about April 2003, Grecula moved from the Pike County, Pennsylvania, but he remained in contact with the CS over the next two years.

7. On or about August 2003, Grecula stated to Frank Iafrate that he would like to have drugs shipped to Monique Grecula's residence, to set her up to be arrested.

8. On or about January 2004, Grecula sent the CS a packet of material that contained, a map to Monique Grecula's residence in the Woodlands, Texas, in furtherance of the plan to either kill her or plant drugs in her home.

9. On or about April 2005, the CS informed DEA Special Agent Barry Robinson that Grecula was soliciting the CS's assistance in locating a buyer for an explosive device, and may be planning to have Monique Grecula harmed as well.

10. On or about May 11, 2005, the CS, under the supervision of the FBI, placed two recorded phone calls to Grecula during which they discussed building an explosive device for the potential "clients" and "getting rid" of Grecula's wife.

11. On or about May 15, 2005, FBI undercover agent ("UCA") placed a recorded phone call to Grecula during which they discussed Grecula's dislike for America and the UCA's clients dislike for America, as well as Grecula's desire to have his wife "imprisoned."

12. On or about May 15, 2005, Grecula spoke to Roger Gordon at a flea market in Pennsylvania and inquired about obtaining a "white light laser," which Grecula has stated could be used as a detonation device.

13. On or about May 16, 2005, during a recorded call Grecula and CS discussed moving forward with the plan to build the explosive device for a terrorist organization and exchange for them helping Grecula regain custody of his children.

14. On or about May 17, 2005, Grecula sends a fax to the CS in Georgetown, Guyana describing the methodology he will use to build the explosive device.

15. On or about May 18, 2005, Grecula speaks to the UCA during a recorded phone call where Grecula stresses his hatred for America and says that some of the components for the explosive device can be obtained at a hardware store.

16. On or May 20, 2005, Grecula travels from Pennsylvania to Houston, Texas for face-to-face meeting with the UCA and the purported "Al-Qaeda" client.

17. On or about May 20, 2005, Grecula meets with the UCA and brings with him a briefcase containing the material related to his ability to build an explosive device, his passport, and his expired pilot's license.

18. On or about May 20, 2005, Grecula meets with the purported "Al-Qaeda" operative and expresses his willingness to help them "kill a bunch of Americans."

19. On or about May 20, 2005, Grecula travels with the UCA to a hardware store to view supplies that could be used to build an explosive device.

20. On or about May 20, 2005, Grecula and the UCA continue their discussions over lunch, where Grecula recommends targets in Washington, D.C. and New York for Al-Qaeda.

21. On or about May 20, 2005, Grecula says that he could train pilots for Al-Qaeda after the UCA states that flight schools are being watched after the "World Trade."

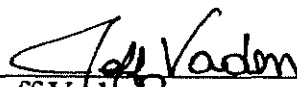
22. On or about May 20, 2005, agents recovered from Grecula's Pennsylvania residence a mercury switch and 1½ pounds of lithium nitrate.

23. On or about May 20, 2005, Grecula admitted that he came to Houston to meet someone he believed to be a representative of a terrorist organization.

A TRUE BILL:

ORIGINAL SIGNATURE  
ON FILE WITH THE CLERK ID JURY

DONALD J. DeGABRIELLE, JR.  
UNITED STATES ATTORNEY

By:   
Jeff Vaden  
Assistant United States Attorney  
(713) 567-9340