



ATTACHMENT A

1
2 In 1997, defendant founded an organization entitled
3 Jam'iyat Ul-Islam Is-Saheeh ("JIS") based on his interpretation
4 of Islam. Defendant preached the duty of JIS members to target
5 for violent attack any enemies of Islam or "infidels," including
6 the United States Government and Jewish and non-Jewish supporters
7 of Israel. Defendant recruited fellow prison inmates to join
8 JIS. Defendant required prospective JIS members to take an oath
9 of obedience to him and swear not to disclose the existence of
10 JIS. Defendant also required prospective JIS members to swear
11 that they would obey a ninety day contact rule, wherein they
12 would communicate with defendant at least once during every
13 ninety day period.

14 In addition to his recruitment efforts inside prison,
15 defendant also sought to establish groups or "cells" of JIS
16 members outside of prison which would carry out violent attacks
17 against perceived infidels, including the United States
18 Government, the Government of Israel, and Jewish persons, in
19 retaliation for the policies of the United States and Israeli
20 governments toward Muslims throughout the world.

21 Beginning in December 2004 and continuing to July 5, 2005,
22 defendant conspired with co-defendants Levar Washington
23 ("Washington"), Gregory Patterson ("Patterson"), and Hammad
24 Samana ("Samana") to levy war against the government of the
25 United States through terrorism, and to oppose by force the
26 authority of the United States government.

27 In furtherance of the conspiracy, defendant wrote and
28 disseminated a document referred to as the "JIS Protocol." In
the JIS Protocol, attached as Exhibit 1, defendant advocated the
establishment of an Islamic Caliphate in the United States. The
JIS Protocol states that "Muslims must be allowed to govern
themselves by Shariah and if not we are being oppressed . . . yet
we must wage the educational as well as the Organizational War or
Jihad." The JIS Protocol set out the criteria for "this task."
Defendant described "Jihad [as] the only true 'anti-terrorist
action' [,] a defensive battle against the aggression of
theological impostors led by Zionism."

The JIS Protocol further states that the "faithful mujahid
are strictly forbidden to obey Kafirs or disbelievers, in fact
they are commanded by Allah to battle against disbelievers . . .
utilizing most strenuous effort." Defendant wrote about "Shia
usurpation" of the name Hezbollah in Lebanon, and claimed that
JIS would "sit back, build and attack!!! Our obvious targets
being the Western forces of the US and their Kufr [sic] society,
Russia, Serbia, Brittain [sic] and Isreal [sic]." The JIS
Protocol states that "[i]t is important that the forementioned
[sic] objectives be carried out, we are not concerned with the
numbers of recruits to this movement, which was a mistake of many
before us that led to the many degrees of compromise and
infiltration, nor are we concerned with the lost [sic] of life in

1 the pursuit of our objectives; for martyrdom Fee Sabil Allah is
2 automatic paradise."

3 Defendant also wrote in the JIS Protocol of the need for
4 secrecy. In one section defendant discusses a probationary
5 period of six months for new recruits and that the "security and
6 clandestine movement of our group must be safeguarded hence
7 correspondence is imperative."

8 Defendant also wrote a document called "Blueprint 2005,"
9 attached as Exhibit 2, which set forth the following goals for
10 members of JIS:

- 11 • learn Arabic;
- 12 • acquire a steady job that does not interfere with
13 learning Arabic;
- 14 • recruit five "special operations members, preferably
15 felony free";
- 16 • "acquire two Weapons (pistols) with silencers";
- 17 • "appoint a member (from the five) to find contacts for
18 explosives or to learn bombmaking. We will need bombs
19 that can be activated from a distance";
- 20 • and "In order to fulfill these task [sic] you must
21 become legitimate. Acquire identification, drivers
22 license, work/school, keep regular contact with your
23 parole agent, attempt to remove your tatoos and monitor
24 your look. Your dress code must not bring attention .
25 . . casual dress so as not to arouse 'extremist
26 suspicion.' We have work to do."

27 Defendant directed JIS members to contact him every ninety
28 days: "Never violate three month contact agreement which means
that you must never fall out of contact with me directly for any
time exceeding 90 days." The Blueprint concludes as follows:

29 May Allah grant us victory through you, for
30 our sole purpose for residence in Dar ul-Harb
31 [house of war] has been outlined: 'O you who
32 believe! Endure and be more patient (than
33 your enemy), and guard your territory by
34 stationing army units (*J.I.S.) Permanently
35 at the place from where the enemy can attack
you (*U.S.A.), and fear Allah, so that you
may be successful' 3:200.

36 Defendant also wrote a document called the "Notoriety
37 Moves," which included a proposed statement to the press
38 following attacks by JIS members. That document, attached as
Exhibit 3, stated: "On missions that are done for leaving
impressions the following letter will be left behind and if 187's

1 [a reference to California's homicide statute] are involved a
2 video tape with one of our spokesman wrapped [sic] in a turban
3 will recite this letter and be sent to all major news stations."
4 The proposed letter reads as follows:

5 This incident is the first in a series of
6 incidents to come in a plight to defend and
7 propagate traditional Islam in its purity.
8 We advise those sincere believers in Allah
9 and followers of the Sunnah of his Messenger
10 to teach their children the importance of
11 staying within the bounds of the Shariah
12 because if you as parents won't enforce [sic]
13 it, the community will. We also advise those
14 sincere Muslims of the ahl-Sunnah wa'l
15 Jama'at to abstain from socializing and or
16 aiding the following targets of Jama'at
17 Islami As-Sahih:

- 18 * The so-called Nation of Islam and its
19 idol worshiping supporters of Farrakhan.
- 20 * The so-called "American-Muslims" or
21 those who follow Warith D. Muhammed's
22 transgression against traditional Islam
23 and the Sunnah (Hadith) of the Messenger
24 of Allah (saw).
- 25 * Those so-called Muslims who trash the
26 four schools of Islamic law and
27 qualified scholarship in Islam.
- 28 * Those so-called Muslims labelled [sic]
Shi'i, and supporters of the infidel
state of Iran.
- * Those so-called Muslims who believe it
permissible to join or support the
American Army (military) in any way.
- * Those so-called Muslims who are
employees of non-Islamic government
institutions that are blatantly in
opposition to the laws and religion of
Islam.
- * Those Jewish and non-Jewish supporters
of an Israeli state.

29 All who fall under the previously mention has
30 [sic] a legitimate reason to fear for their
31 safety. We are not extremists, radicals, or
32 terrorists. We are only servants of Allah
33 and lovers of the Sunnah, our actions will
34 gladly be corrected with proof from Islamic
35 sources . . . Once again, I advised [sic] the
36 masajid of America to hire or seek qualified
37 imams to govern over your Islamic centers and
38 restore Islamic Shariah to your areas. If by
doing this you come into opposition from
local law enforcement then know that it's



1 time for you to migrate. Allahu Alim!

2 Jama'at Islami As-Sahih

3 Defendant recruited Washington into JIS while both were
4 inmates at New Folsom Prison, and had Washington swear an oath of
5 loyalty and obedience to defendant and JIS. In furtherance of
6 the conspiracy, after his release from prison, Washington
7 recruited Patterson and Samana into JIS and had them swear oaths
8 of allegiance and obedience to JIS.

9 In furtherance of the conspiracy, defendant committed the
10 following acts, among others:

11 a. In December 2004, defendant instructed Washington to (1)
12 recruit five individuals without felony convictions and train
13 them in covert operations; (2) acquire two firearms with
14 silencers; and (3) appoint an individual from the group he
15 recruited to find contacts for explosives or learn to make bombs
16 that could be activated from a distance.

17 b. Between December 2004 and July 5, 2005, defendant wrote
18 letters to Washington advising him on how to recruit new members
19 for JIS and instructing Washington to take Patterson to a mosque
20 in San Diego to look for new recruits. Defendant also asked
21 Washington to send him copies of the JIS Protocol for defendant
22 to distribute in prison.

23 c. Between December 2004 and July 5, 2005, defendant wrote
24 a letter to Washington which stated the following: "Be careful
25 Akhi [brother], there are agents everywhere looking for Al-Qaida
26 recruiters or any other threat to national security. This is
27 another reason why I haven't commended any of our members already
28 out there to move forward. Their work must remain totally
charitable and educational. Your squad will be engaged on all
levels."

d. In March 2005, defendant wrote a letter to Washington
telling him that Patterson should keep his job at Los Angeles
International Airport and that "al-Bakistani" [referring to
Samana] "should also be a very beautiful asset."

e. In March 2005, defendant sent Washington a visitor's
slip to arrange for Patterson to visit defendant in prison.

f. In May 2005, defendant sent Washington a visitor's slip
for Samana to visit defendant in prison.

g. In June 2005, defendant sent Washington a letter saying
that defendant was sending Washington a "young comrade" who was a
"walking martyr." Defendant told Washington to place the recruit
"under your command" and that "global plight" would be "his
focus."


Defendant admits that the above-listed overt acts were in



1 furtherance of the conspiracy to retaliate against the
2 governments of the United States and Israel by attacking targets
3 in Southern California associated with the U.S. military and the
4 Jewish religion.
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



Jama'at Islami As-Sahih



1
2 James recruited defendant into JIS, and had defendant swear
3 an oath of loyalty and obedience to James and JIS. In
4 furtherance of the conspiracy, defendant recruited Patterson and
5 Samana into JIS and had them swear oaths of allegiance and
6 obedience to defendant and JIS. Defendant decided that gas
7 stations would be robbed to supply money for the group's planned
8 attacks in the Los Angeles area. Defendant and Patterson
9 participated in numerous armed robberies of gas stations in
10 fulfillment of this plan.

11 In furtherance of the conspiracy, Samana researched targets
12 for attack, and wrote them down on a document called "Modes of
13 Attack," attached as Exhibit 1. The document included the
14 following notations: "LAX and Consulate of Zion" listed under the
15 heading of "Options"; "Military Targets" with two addresses
16 listed underneath it; "Army Recruiting centers throughout the
17 county" written under the "Military Targets" notation, followed
18 by multiple addresses in Los Angeles; "Military base in Manhattan
19 Beach" and then some additional addresses; and "Campsite of
20 Zion."

21 Samana drove the getaway car for defendant on several armed
22 gas station robberies.

23 In furtherance of the conspiracy, defendant committed the
24 following acts, among others, in Los Angeles and Orange Counties:

25 a. On or about June 6, 2005, defendant, armed with a
26 shotgun, and Patterson, who drove the getaway car, robbed a gas
27 station in Torrance, California.

28 b. On the night of July 4, 2005, defendant, Patterson, and
Samana went to Kenneth Hahn Park in Los Angeles and engaged in
target practice as part of their preparation for attacks in the
Los Angeles area.

c. On or about July 5, 2005, defendant, armed with a
shotgun, and Patterson, who drove the getaway car, robbed a gas
station in Fullerton, California.

Defendant admits that the above-listed overt acts were in
furtherance of the conspiracy to retaliate against the
governments of the United States and Israel by attacking targets
in Southern California associated with the U.S. military and the
Jewish religion.