



Chief Judge Coughenour

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in The U.S. DISTRICT COURT at Seattle, Washington.

14 February 2001
By Bruce Rifkin Deputy Clerk

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

AHMED RESSAM,
a/k/a Benni Noris, and
ABDELMAJID DAHOUMANE,

Defendants.

NO. CR99-0666JCC

SECOND SUPERSEDING
INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

(An Act of Terrorism Transcending a National Boundary)

Beginning at a time unknown but during 1996, and continuing through on or about December 14, 1999, in Canada and within the Western District of Washington, involving conduct which transcended a national boundary and utilizing a facility of foreign commerce AHMED RESSAM, ABDELMAJID DAHOUMANE, and others known and unknown by the Grand Jury, knowingly created a substantial risk of serious bodily injury to another person, by conspiring to destroy or damage structures, conveyances or other real or personal property within the United States in violation of the laws of the State of Washington, that is, Chapter 9A.48 and Section 9A.28.040 of the Revised Code of Washington.

The Grand Jury further charges that to effect the object of this conspiracy one or more of the defendants and co-conspirators took one or more substantial steps within the Western District of Washington, including, but not limited to, the following: 1. The offenses charged in Counts 2 and 5-9 of this Second Superseding Indictment which are incorporated herein as if

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1 fully set forth herein; and 2. on December 14, 1999, in Port Angeles, Washington, AHMED
2 RESSAM escaped from U.S. Customs officials and attempted to carjack a vehicle as he fled
3 from U.S. Customs officials.

4 All in violation of Title 18, United States Code, Sections 2332b(a)(1)(B) and 2332b(c).

5 COUNT 2

6 (Placing an Explosive in Proximity to a Terminal)

7 On or about December 14, 1999, at Port Angeles, within the Western District of
8 Washington, AHMED RESSAM and ABDELMAJID DAHOUMANE, with reckless disregard for
9 the safety of human life, willfully placed or caused to be placed an explosive or other
10 destructive substance in proximity to a terminal, structure or facility used in the operation of, or
11 *in support of the operation of, motor vehicles engaged in interstate or foreign commerce.*

12 All in violation of Title 18, United States Code, Sections 33 and 2.

13 COUNT 3

14 (False Identification Documents)

15 On or about December 14, 1999, at Victoria, British Columbia, Canada, in order to gain
16 entry to Port Angeles, Washington, and continuing until his arrival in Port Angeles,
17 Washington, within the Western District of Washington, AHMED RESSAM did knowingly
18 possess a false and fraudulently obtained identification document with the intent that such
19 document be used to defraud the United States.

20 All in violation of Title 18, United States Code, Section 1028(a)(4) and (b)(3)(B).

21 COUNT 4

22 (Use of a Fictitious Name for Admission)

23 On or about December 14, 1999, at Victoria, British Columbia, Canada, when applying
24 for admission to the United States at Port Angeles, Washington, within the Western District of
25 Washington, AHMED RESSAM knowingly did personate another and did evade or attempt to
26 evade the immigration laws of the United States by appearing under an assumed and fictitious
27 name without disclosing his true identity, in that AHMED RESSAM told a U.S. Immigration
28 official he was Benni Noris, and presented a false and fraudulently obtained Canadian
identification document in that name..

All in violation of Title 18, United States Code, Section 1546.



COUNT 5
(False Statement)

1 On or about December 14, 1999, at Port Angeles, within the Western District of
2 Washington, in a matter within the jurisdiction of the United States Customs Service, an
3 agency of the United States, AHMED RESSAM did knowingly and willfully make a false,
4 fraudulent, and fictitious material statement and representation; in that the defendant
5 presented to U.S. Customs inspectors a Customs Declarations Form #6059B identifying
6 himself as Benni Noris, whereas in truth and fact, as he then well knew, this statement was
7 false in that his true name is AHMED RESSAM:
8

9 All in violation of Title 18, United States Code, Section 1001.

COUNT 6
(Smuggling)

10 On or about December 14, 1999, at Port Angeles, within the Western District of
11 Washington, AHMED RESSAM and ABDELMAJID DAHOUMANE knowingly and fraudulently
12 brought into the United States merchandise contrary to law, that is, hexamethylene triperoxide
13 diamine, cyclotrimethylene trinitramine, and a nitroglycerine equivalent identified as ethylene
14 glycol dinitrate.
15

16 All in violation of Title 18, United States Code, Sections 545 and 2.
17

COUNT 7
(Transportation of Explosives)

18 On or about December 14, 1999, at Port Angeles, within the Western District of
19 Washington, AHMED RESSAM and ABDELMAJID DAHOUMANE, not being licensees or
20 permittees under the provisions of Chapter 40 of Title 18 of the United States Code, knowingly
21 transported and shipped, and caused to be transported and shipped, in interstate and foreign
22 commerce, from Canada into the United States, explosive materials, that is, hexamethylene
23 triperoxide diamine, cyclotrimethylene trinitramine, and a nitroglycerine equivalent
24 identified as ethylene glycol dinitrate.
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26 All in violation of Title 18, United States Code, Sections 842(a)(3)(A), 844(a) and 2.
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COUNT 8

(Possession of an Unregistered Destructive Device)

On or about December 14, 1999, at Port Angeles, within the Western District of Washington, AHMED RESSAM knowingly possessed a firearm, that is, a destructive device as that term is defined in Title 26, United States Code, Section 5845(f), not registered to him in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

COUNT 9

(Carrying an Explosive During the Commission of a Felony)

On or about December 14, 1999, at Port Angeles, within the Western District of Washington, AHMED RESSAM knowingly carried an explosive during the commission of a felony prosecutable in a court of the United States, that is, making a false statement to a U.S. Customs Inspector as charged in Count 5 herein.

All in violation of Title 18, United States Code, Section 844(h)(2).

A TRUE BILL:

DATED: Feb 14 2001

Cynthia J. Vankubal
FOREPERSON

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