UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
v.)	
DAVID WRIGHT,)	Crim. No. 15-10153-WGY
Defendant.)	

STIPULATION OF FACT REGARDING FOREIGN TERRORIST ORGANIZATION DESIGNATION

The United States, through the undersigned attorneys, and defendant David Wright do hereby stipulate to the following:

- On or about October 15, 2004, the United States Secretary of State designated al-Qaeda in Iraq (AQI), then known as Jam 'at al Tawid wa' al-Jahid, as a Foreign Terrorist Organization (FTO) under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive order 13224. In so doing, and as required under Executive Order 13224, the Secretary of State determined that al-Qaeda in Iraq had committed, or posed a significant risk of committing, acts of terrorism that threaten the security of U.S. nationals or the national security, foreign policy, or economy of the United States.
- 2) On or about May 15, 2014, the Secretary of State amended the designation of al-Qaeda in Iraq as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (ISIL) as its primary name. The Secretary of State also added the following aliases to the FTO listing: The Islamic State of Iraq and al-Sham (ISIS), The Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furquan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

Agreed to by,

William D. Weinreb Acting United States Attorney

B. Stephanie Siegmann Assistant U.S. Attorney

Gregory Gonzalez, Trial Attorney U.S. Dept. of Justice, National Security Div.

David Wright, Defendant

Jessica Hodges, Esq. Michael Tumposky, Esq. Forest O'Neill-Greenberg, Esq. Counsel for David Wright