

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 1:16-CR-265
)	
NICHOLAS YOUNG)	

GOVERNMENT’S OPPOSITION TO
DEFENDANT’S OMNIBUS MOTION IN LIMINE

Defendant Young asserts that he was entrapped into supporting terrorists and obstructing justice, Young’s Brief at 2,¹ but moves to bar much of the government's evidence of his predisposition to do so on the grounds of relevance or undue prejudice. His motion should be denied. The defense in this case is based on a claim of entrapment. In light of that defense, the evidence at issue is relevant, and its probative value outweighs the risk of undue prejudice.

Background

In December 2016, Young was indicted for attempting to provide material support to the Islamic State ("ISIS") and obstruction of justice. In essence, the indictment alleges that, to keep the government from learning that his friend ("Mo") had joined ISIS in November 2014 - - and that Young was still in regular contact with him - - Young tried to mislead the FBI in December 2015 about his contacts with Mo over the previous 18 months. The indictment further alleged that, in July 2016, Young attempted to send money to ISIS by transmitting gift card codes to an account that Young believed was controlled by Mo.

¹“Young’s Brief at ___” refers to “Memorandum in Support of Defendant Nicholas Young’s Omnibus Motion in Limine,” Docket #117-1.

Young claims that he was entrapped. As a result, the government must show that he was predisposed to support ISIS. As best we can tell, Young will argue that his contact with an undercover officer known to him as “Khalil” between 2010 and 2012 contributed to his “entrapment” in 2016. *See* Young’s Brief at p.1 (“the government will also attempt to prove he had a predisposition to materially support the FTO before the criminal investigation began, in 2010 or earlier”). As a result - - at least according to Young - - the government’s proof of predisposition must predate his encounter with Khalil. In light of that argument, the government’s proof of Young’s predisposition will include evidence that pre-dates 2010.

Months ago, the government produced to the defense a draft list of its trial exhibits, many of which will be used not only to establish Young’s motive to support ISIS, but also to rebut his claim that he was entrapped into attempting to do so. Young moved to exclude numerous of those exhibits. Dkt. 117. That motion is not supported by the law, and should be denied.

Argument

In his moving pleading, Young cites to a variety of cases holding that various types of evidence were inadmissible in those cases as irrelevant or unduly prejudicial. As far as we could tell, only one of those cases involved a defense of entrapment. This distinction is vital because, when submitted to prove predisposition, evidence of prior bad acts is not subject to the constraints on the admission of such evidence that are ordinarily applied pursuant to Rule 404(b).

Young seeks to have his cake and eat it too: he puts his mindset at issue by claiming entrapment, but simultaneously claims that the government’s evidence of his mindset should be barred as unduly prejudicial. Settled authority precludes this tactic. As the Supreme Court held years ago, “if the defendant seeks acquittal by reason of entrapment he cannot complain of an appropriate and searching inquiry into his own conduct and predisposition as bearing upon that

issue. If in consequence he suffers a disadvantage, he has brought it upon himself by reason of the nature of the defense.” *Sorrells v. United States*, 287 U.S. 435, 451 (1932), *quoted in United States v. McLaurin*, 764 F.3d 372, 381 (4th Cir. 2014). Evidence of Young’s support for terrorism is, therefore, admissible to rebut his own claim that his desire to support ISIS was implanted in him by the government.

Because Young’s arguments in support of his motion virtually ignore entrapment law, they rest on propositions that are inapplicable to his case. As explained below, the exhibits in question are indisputably relevant. Their probative value outweighs any risk of unfair prejudice, and they should be admitted - - at the least - - to prove his predisposition to support terrorists.

I. Character Evidence Is Relevant and Admissible in Entrapment Cases

Relevant evidence is any evidence that “has any tendency to make a fact more or less probable than it would be without the evidence,” so long as “the fact is of consequence in determining the action.” Fed.R.Evid. 401. All relevant evidence is admissible, except as otherwise provided by the Constitution, by Act of Congress, or by applicable rule. Fed.R.Evid. 402. Evidence of other bad acts may be admissible to prove intent or motive. Fed. R. Evid. 404(b). Indeed, “[e]xtrinsic acts evidence may be critical to the establishment of the truth as to a disputed issue, especially when that issue involves the actor’s state of mind and the only means of ascertaining that mental state is by drawing inferences from conduct.” *Huddleston v. United States*, 485 U.S. 681, 685 (1988).

While evidence of other bad acts may be admissible to prove intent or motive, Rule 404 generally prohibits such evidence to prove the defendant’s character - - except in cases involving claims of entrapment. Indeed, Rule 404(b)’s requirements are relaxed when the defendant claims entrapment. When a defendant claims entrapment, “there is no doubt that proving

predisposition is one of the purposes for which bad-act evidence may be admissible.” *United States v. McLaurin*, 764 F.3d 372, 380 (4th Cir. 2014).

“Predisposition is itself a broad concept, and a broad swath of evidence, including aspects of the defendant’s character and criminal past, is relevant to proving predisposition.” *Id.* at 381. As a result, and “[g]iven the range of evidence that is relevant to the predisposition issue, certain bad-act evidence may be admissible under Rule 404(b) in entrapment cases that would not be admissible in cases where entrapment is not an issue.” *Id.* As the *McLaurin* panel stated:

Proving disposition to commit a crime is very close to proving “criminal propensity,” the very type of prejudice against which the general prohibition on admission of evidence of other crimes is directed. In an entrapment case, however, the issue is precisely whether the accused, at the time of the government inducement, had a propensity to commit crimes of the nature charged — that is, whether he was predisposed to do so.

*Id.*² Thus, “assertion of an entrapment defense does not justify admission of every bad act ever done by the defendant, but distinguishing the unwary innocent from the unwary criminal nonetheless requires a “searching inquiry.” *Id.* See also *United States v. Thomas*, 134 F.3d 975, 980 (9th Cir. 1998) (since character is an essential element of the entrapment defense, “even if the proffered evidence were not admissible under Rule 404(b), we would still hold that it is admissible [in an entrapment case] under Rule 405(b)”).

Young’s claim that this case is just a “gift card” case, Young’s Brief at 1, is an epic understatement of the conduct at issue. The indictment charges that Young attempted to provide material support to ISIS, both by trying to protect an individual that he believed to be an ISIS fighter, and also by sending money for the purpose of financing ISIS’s recruitment of other

² Internal quotations and citations are omitted from quotations throughout this pleading.

fighters. Nevertheless, even if Young's characterization were true, his claim that this is just a "gift card" case would not limit the predisposition evidence that would be admissible.

When used to show predisposition in a terrorism case, the relevant prior design to commit the crime or similar crimes need be only a rather generalized idea or intent to inflict harm on interests of the United States. *United States v. Cromitie*, 727 F.3d 194, 207 (2d Cir. 2013). See *United States v. Hackley*, 662 F.3d 671, 682 (4th Cir. 2011) ("Predisposition is not limited only to crimes specifically contemplated by the defendant prior to government suggestion"). Evidence of conduct occurring both before and after the defendant was contacted by the government is admissible to prove predisposition. *United States v. Squillacote*, 221 F.3d 542, 566 (4th Cir. 2000).

By claiming entrapment, Young asserts that his desire to support ISIS was implanted by the government. As discussed below, evidence of Young's support for terrorism in general (or ISIS in specific) is relevant and admissible to disprove this assertion.

II. Evidence of Young's Predisposition Is Not Unfairly Prejudicial

Young claims that numerous categories of evidence are unfairly prejudicial. "Where the evidence is probative, [however,] the balance under Rule 403 should be struck in favor of admissibility, and evidence should be excluded only sparingly." *United States v. Lentz*, 524 F.3d 501, 525–26 (4th Cir. 2008). "Evidence which tends to rebut a defendant's claim of innocent action is unlikely to be unduly prejudicial." *United States v. El-Mezain*, 664 F.3d 467, 509–11 (5th Cir. 2011) (in a terrorist financing case, affirming the admission of videotapes of demonstrators destroying American flags and violent images of the aftermath of Hamas suicide bombings).

When evidence in terrorism cases is probative, it properly is admitted even though it may be "alarming," *United States v. Benkahla*, 530 F.3d 300, 310 (4th Cir. 2008); "disturbing,"

United States v. Salameh, 152 F.3d 88, 122 (2d Cir. 1998); or even “blood curdling.” *United States v. Mubayyid*, 658 F.3d 35, 56 (1st Cir. 2011). This is so because such evidence is “directly related to the nature of the crimes that the defendant has set out to commit.” *United States v. Mehanna*, 735 F.3d 32, 64 (1st Cir. 2013). “Terrorism trials are not to be confused with high tea at Buckingham Palace.” *Id.*

In short, emotionally-charged evidence that might be barred in a different context is admitted in terrorism cases, because such evidence is no more inflammatory than the emotionally-charged crimes with which the defendant has been charged in the first place. *See, e.g., United States v. Abu-Jihaad*, 630 F.3d 102, 132–33 (2d Cir. 2010) (“[W]e conclude that the recorded discussions were both highly probative of the charged crime and, to the extent they referenced uncharged contemporaneous support for jihad, no more inflammatory than the charges alleged in the indictment.”).

As discussed below, none of the government’s evidence in this case is more prejudicial than the charges for which Young was indicted. Even if there were a risk of undue prejudice, the court could cure it by instructing jurors on the purpose for which they may consider the government’s evidence of predisposition. *United States v. Sterling*, 860 F.3d 233, 248 (4th Cir. 2017) (affirming this Court’s limiting instruction that effectively mitigated any risk of unfair prejudice from prior bad act evidence).

III. The Government’s Exhibits Are Admissible

In his motion, Young moves to bar admission of hundreds of separate exhibits, but justifies their exclusion only to the extent that they fit within categories he specifies. In doing so, he would have the Court sweep with an improperly broad brush. Individual exhibits are

probative of motive and predisposition for multiple reasons. As a result, they are not as easily characterized as Young suggests.

For example, Young moves to bar the government from introducing the explosives and components of explosives seized from his residence, as well as the approximately 19 firearms; 18,000 rounds of ammunition; 70 pieces of body armor; and 60 knives, daggers, and swords that were seized there as well. Possession of such an arsenal surely is probative of a predisposition to support terrorists. *See, e.g., United States v. Lampley*, 127 F.3d 1231, 1243 (10th Cir. 1997) (defendant's carrying of guns was proof of his predisposition to enter a conspiracy to bomb buildings in Texas and Alabama). Indeed, possession of that arsenal is admissible to establish simply a motive to support terrorists regardless of any entrapment defense. *United States v. Hassan*, 742 F.3d 103, 143 (4th Cir. 2014) (knowledge that his co-conspirator "was stockpiling weapons" was probative of the defendant's involvement in a conspiracy to support terrorists).³

Yet, Young's possession of individual items within that arsenal is probative of his predisposition and intent, regardless of their inclusion within the stockpile as a whole. For example, included within the arsenal are individual weapons that also appeared in photos of Young wearing traditional Arab or Muslim garb, and in photos of Young in the uniform of Nazi SS Stormtrooper Klaus Dusselkamp. Among the seized weapons are knives that bear Nazi insignia. Other knives were designed so that they can be smuggled past metal detectors; they are relevant not only because they were parts of Young's arsenal, but also because they lend color and credence to Khalil's expected testimony that Young bragged about his ability to smuggle weapons into the Alexandria Federal Courthouse.

³ Young claims that he possessed this arsenal as an investor, Young's Brief at 22, but this is an argument as to the weight of the evidence, not to its admissibility. In any event, the 18,000 rounds of ammunition (enough to fire one round per second continuously for more than five hours) that Young possessed does not appreciate in value.

In short, individual exhibits fall within multiple categories, and may be admissible for multiple reasons. The admissibility of each exhibit merits consideration in its own right, but, in the space of this one pleading, we cannot address all the reasons for the admissibility of each exhibit. As a result, we can bring to the Court's attention just a handful of the exhibits that would be barred by Young's generalized arguments. Accordingly, we request the opportunity to address with specificity in the future the admissibility of any particular exhibit that, in light of the present motion, the Court is inclined to bar.

A. Evidence of Young's Support for Nazis and White Supremacists

Regardless of whether support for Nazis is always relevant to prove a defendant's support for terrorists, it surely can be relevant when a defendant puts his motivation to support terrorism at issue by claiming entrapment. As discussed below, the evidence in this case will establish that Young supported both Nazis and ISIS, and that his motivation to do so was the hatred of Jews that he shared with both. As a result, evidence of Young's support for Nazis is relevant to establish his predisposition to support ISIS. *See United States v. Mahon*, CR 09-712 PHX-DGC, No. 2010 WL 4038763, at *11 (D. Ariz. Oct. 14, 2010) (holding that defendant's "allegiance to [white supremacist] groups that advocated violence" constituted evidence of predisposition to commit violent crimes), *aff'd*, 793 F.3d 1115 (9th Cir. 2011). *See also United States v. Magleby*, 241 F.3d 1306, 1319 (10th Cir. 2001) (admitting racist song lyrics on white supremacist CD owned by the defendant in a non-entrapment case because the defendant's state of mind was at issue); *United States v. Mostafa*, 16 F. Supp. 3d 236, 260, 266 (S.D.N.Y. 2014) (admitting defendant's statement, "these dirty Jews, Christians, most of them homosexual

persons,” in a non-entrapment case, but not admitting other disparaging statements on the ground that they were cumulative).⁴

Exhibit 1 to this pleading is a report by Dr. Daveed Gartenstein-Ross, titled *Report on the Relationship Between Affinity for Nazism and Inclination to Support Militant Islamist Groups*.

With a Ph.D in World Politics (and a law degree), Dr. Gartenstein-Ross has extensively researched, written, lectured, and taught about Islamist militancy and terrorism; white separatists and Neo-Nazis, and radicalization processes. Exhibit 1, at 1-9.⁵

As detailed in Dr. Gartenstein-Ross’s report, the mechanisms of radicalization that attract individuals to neo-Nazism and to militant Islam are highly similar. Exhibit 1, at 10-18. The report also details multiple areas of convergence and ideological similarities between Nazi and Islamist militant movements, and the historical precedent for this convergence. *Id.* at 18-22. The report details the centrality of Jew-hatred to both movements, and discusses numerous cases where extremists motivated by hatred of Jews, like Young, embraced both ideologies simultaneously, or moved fluidly from one to the other. *Id.* at 23-39.

The report also explains that, when individuals convert to Islam after having been immersed in or attracted to Nazism, they often dive right into the extremist end of the spectrum of Islamic ideology. In short, in Exhibit 1, Dr. Gartenstein-Ross explains why evidence of an

⁴ Young characterizes the decision in *United States v. Bowman*, 302 F.3d 1228 (11th Cir. 2002), as “reversing trial court over inclusion of ‘white pride’ t-shirt.” Def. Br. at 19. To the contrary, the decision affirmed the conviction, and no such t-shirt is discussed in the opinion. The Eleventh Circuit did agree that evidence of a motorcycle club’s whites-only policy was not admissible evidence, because the defendant’s “allegiance to a racist organization is not relevant to his guilt or innocence in this case.” *Id.* at 1239. In contrast, Young’s entrapment defense renders his own allegiances very much at issue.

⁵ As a convert to Islam, Dr. Gartenstein-Ross’s first book, *My Year Inside Radical Islam*, was about his time employed by the American branch of a Saudi charity that was designated by the United States as a provider of financial and material support to al-Qaeda. Exhibit 1, at 2.

individual's attraction to Nazism is related to the question of whether that individual is predisposed to supporting Islamist terrorists. *Id.* at 35.

In this context, evidence of the relationship between Naziism and radical Islamists, as well Young's attraction to Nazis, is probative of whether Young's support for ISIS was implanted in him by the government, or the product of his own predisposition to support terrorists that hate Jews just like he does. This includes evidence of Young's involvement with Nazis and radical Islam at the same time.

Exhibit 2 consists of trial exhibits that are probative of Young's intense interest in terrorism - - of the Nazi variety. These include:

Government Exhibit ("GX") 10-220, two slides found in Young's computer, explaining that the lightning bolt symbol of the SS is "used in various tattoos mainly by the Neo-Nazi and Racist skinheads" and "characterizes the belief of these extremist groups in Anti-Semitism, White Supremacy, and Fascism." While possession of such slides obviously does not establish one to be Nazi sympathizer, such possession is probative of whether the owner understands the symbolism of the SS lightning bolts;

GX 10-701, a book seized from Young's residence, titled "The SS: Hitler's Instrument of Terror", with the SS lightning bolt symbol on its cover. Again, possession of such a book obviously does not establish one to be Nazi sympathizer, but such possession is probative of whether the owner understands the nature of the Nazi SS;

GX 3-110, a tie-tac seized from Young's truck in August 2016, in the shape of the Nazi SS lightning bolt symbol;

GX 10-903, a photo first saved on his home computer in 2007, showing Young in his Nazi SS uniform and holding a pistol;

GX 10-905, a photo first saved on his home computer in 2007, showing Young and his associates in their Nazi SS uniforms in front of a Nazi flag;

GX 10-907, a photo of Young in his Nazi SS uniform, with his "death's head" logo;

GX 4-300, a booking photo of Young's arm tattoo taken after his arrest in August 2016, showing the official insignia of the 9th SS Panzer Division "Hohenstaufen;"⁶

GX 10-714, a flag seized from Young's house, known as the "reichskriegsflagge," and typically used by Neo-Nazis.⁷ Use of this flag by Neo-Nazis stems from its earlier use by the Freikorps, a precursor of the Nazis that, following World War I, sought to use brutality against their enemies in Germany (particularly Jews) as political expression. Many Freikorps officers became prominent Nazi officials, including Rudolf Höss, a commander of the Auschwitz concentration camp;⁸

GX 11-400, a photo of Young' truck, with the license plate "FRI-KRP," a reference to the Freikorps;⁹ and

GX 10-459 and GX 10-495, two of the approximately 50 knives seized from Young's house; these knives bear the Nazi swastika and eagle.¹⁰

Exhibit 3 includes GX 13-105, a book found in Young's residence in 2016. The book, *Serpent's Walk*, is by a leader of the American Neo-Nazi movement known as the National Alliance, and is about an underground Nazi revolutionary movement (led by the SS) to reverse the results of World War II. In short, the book is propaganda for the National Alliance. Trial

⁶ See, e.g., Patrick Hook, *Hohenstaufen: 9th SS Panzer Division* (Surrey, UK: Ian Allan Publishing, 2005).

⁷ Anti-Defamation League, "Imperial German Flag" (n.d.), available at <https://www.adl.org/education/references/hate-symbols/imperial-german-flag>.

⁸ See, e.g., <http://www.nytimes.com/1987/06/21/books/the-women-they-feared.html>; Robert Gerwarth, "The Central European Counter-Revolution: Paramilitary Violence in Germany, Austria, and Hungary after the Great War," *Past and Present* 200:1 (2008), pp. 179-81.

⁹ Also visible in the photo is the bumper sticker on Young's truck that states "Boycott the Terrorist State of Israel."

¹⁰ Young's suggestion that he was merely a participant in World War II reenactments goes to the weight of the evidence, but not their admissibility. In any event, Young did not merely assume the identity of an ordinary soldier in the German army, but that of a member of a Nazi SS unit, with the "death's head" insignia on his headgear. Moreover, as some of the exhibits attached to this pleading establish, he did not assume the Dusselkamp identity solely for the purpose of participating in battle reenactments.

evidence will show that, in approximately 2010, Young gave another copy of that same book to a friend.

Exhibit 3 also includes GX 10-862 and GX 10-863, both seized from Young's residence in 2016. GX 10-862 is a pamphlet titled "Who Rules America," and published by National Vanguard Books, the publishing arm of the National Alliance. In the pamphlet, William Pierce (the actual author of *Serpent's Walk*) argues that "there is nothing - - plague, famine, economic collapse, even nuclear war - - more dangerous to the future of our people" than the "Jewish control of the American mass media."

Serpent's Walk and *Who Rules America* are probative of Young's interest in terrorism - - of the Neo-Nazi variety. As such, they are admissible to show his predisposition to support terrorism. See *United States v. Siraj*, No. 07-0224-CR, 2008 WL 2675826 at *2 (2d Cir. July 9, 2008) (affirming admission into evidence of books and videos recommended by the defendant despite claims that they were unduly prejudicial).

In *Siraj*, the defendant ("Matin") claimed that he was entrapped into a conspiracy to support terrorism. He argued that the probative value of books the government sought to introduce at trial was outweighed by their prejudicial value, but the district judge rejected his argument. On appeal, the Second Circuit agreed that the books were properly admitted, on the grounds that, "[t]o the extent that Matin recommended the books, they were relevant to show predisposition; and to the extent the books were for sale in the shop where Matin worked, they tended to rebut Matin's assertion that the cooperating witness first exposed him to radical Islam and violent jihad." *Id.* The same reasoning applies to the books and videos that Young gifted, recommended (on Facebook or otherwise) or simply maintained in his possession.

GX 10-863 is a flyer depicting two Klansmen burning a cross, with the caption, "Burning Cross Records, Your Newest White Power Music Source." Notwithstanding the relevance of the flyer inherent in Young's possession of it in 2016, its admission also will corroborate the testimony of a witness who is expected to testify about Young's ideological journey after college, including that he observed Young listening to "white power" music.

Evidence at trial will include evidence of Young's support for terrorism based on the convergence of the Jew-hatred commonly espoused by Nazis and radical Islamists. We expect to present testimony from a former friend of Young that, after attending a gathering of Neo-Nazis in approximately 2000, Young said words to the effect of "don't discount an alliance with Muslims to combat the Jews."

Exhibit 4 includes selected exhibits that, along the same lines, we expect to introduce to establish Young's interest in the *convergence* of Nazis and Islamists. Many of these involve Haj Amin al-Husseini, the Mufti of Jerusalem during World War II. As noted in Exhibit 1 (at page 33), "Perhaps no other figure did more to foster ties between rightwing extremism and militant Islam." As explained by Dr. Gartenstein-Ross, Husseini made pro-Axis radio broadcasts to the Arab world in which he implored Muslims to aid the Nazi slaughter, and stressed the ideological affinities between German National Socialism and Islam. In one broadcast, he urged Muslims to "kill the Jews wherever you find them. This pleases God." Exhibit 1, at 34.

Exhibit 4 includes GX 10-231, a photo of al-Husseini with Hitler, that was saved on Young's computer media in 2007. As explained in the report of Dr. Gartenstein-Ross, during the meeting with al-Husseini, Hitler assured him of the Nazis' commitment to exterminating the Jews, and promised eventually to make Husseini the "Arab führer." Exhibit 1, at 34.

Following the meeting with Hitler, Husseini played an important role for the Nazis. In 1943, he helped organize the 13th Waffen Mountain Division of the SS Handschar, a volunteer force composed predominantly of Bosnian Muslims. Exhibit 1, at 34. Exhibit 3 includes GX 10-232 and 10-240, photos found in Young's media, of Husseini inspecting the Muslim SS troops. GX 10-238 and GX 10-237 also were found in Young's media; the former shows Muslim SS troops, and the latter shows them reading a booklet authored by Husseini, "Islam und Judentum." According to Dr. Gartenstein-Ross, that booklet was intended to inspire Muslim SS units, and promote their involvement in the Jewish genocide. Exhibit 1, at 34.

Exhibit 4 also includes GX 10-230, a poster saved to Young's computer media in December 2007. Depicting Husseini shaking hands with a Nazi, the poster bears the words (translated into English), "Worldwide Association of Nazis and Islamists." The poster is not a collector's item from World War II; according to the poster, the alliance started in 1939, but it was still active as of 2004. Also in Exhibit 4 is GX 8-107, which is a screenshot from Young's Facebook page (in the name of Ciaphas Cain) referencing Mohammad Amin al-Husayni.¹¹

Exhibit 5 is GX 14-180, a partial list of the websites that Young had bookmarked on his home computer in 2011. Listed chronologically, the list shows that, during the same time period that Young bookmarked websites related to Jew-hatred, Neo-Nazis, and Hitler, he also bookmarked websites related to Bin Laden, Anwar Awlaki, and other radical Islamists.¹²

¹¹ Of all of Young's materials related to Husseini, none reflected any context other than his relationship to Hitler, Nazis, and the Muslim SS troops that Husseini recruited.

¹² One bookmark was to a webpage regarding Alois Brunner, a Nazi who converted to Islam. As detailed on the webpage bookmarked by Young, Brunner had been an assistant to Adolf Eichmann, and an SS officer responsible for sending around 100,000 Jews to concentration camps.

Exhibit 6 consists of GX 8-108 and GX 8-109, reflecting that Young linked his Facebook page to a news article about the 2011 arrest in Pittsburgh of Emerson Begolly, an American Neo-Nazi who converted to Islam and called on-line for Jews to be slaughtered. Begolly, who was sentenced to 102 months in prison for soliciting crimes of violence, is a subject of Dr. Gartenstein-Ross's report. *See* Exhibit 1, at 24.

Exhibit 7 consists of the juxtaposition of GX 14-113 and GX 14-114, which show Young in his SS uniform before a Nazi flag (and his colleagues performing a "siege heil" salute) in photos saved to his computer media on January 28, 2006, and GX 14-117 and GX 14-119, which show Young dressed in Muslim garb in photos saved to his computer five days later. In GX 14-119, Young is holding a rifle.

Proof at trial will show that Young manifested his support for Naziism *at the same time* as he manifested his support for ISIS. For example, when Young created an email account in October 2014, in order to be able to communicate covertly with "Mo" (who Young believed would be serving with ISIS in Syria), Young set it up under the name under the name "Essakobayashi." Required to provide the internet service provider ("ISP") with a date of birth in order to create the new account, Young provided *Hitler's* birthday: 4/20/89. Exhibit 8 includes GX-100 and GX 6-109-5T; the former is the ISP record reflecting the date of birth that Young used, and the latter is the transcript of the part of the conversation in which Young told Mo that Young using Hitler's birthday as the birthdate for "Essakobayashi."

Exhibit 8 also includes GX 4-203, a graphic found on the phone seized from Young incident to his arrest. Describing it as stating, over a picture of billowing smokestacks, that

"Together we can finish what Hitler started" does not do it justice, so we include it here (in color, as it was found on Young's phone):

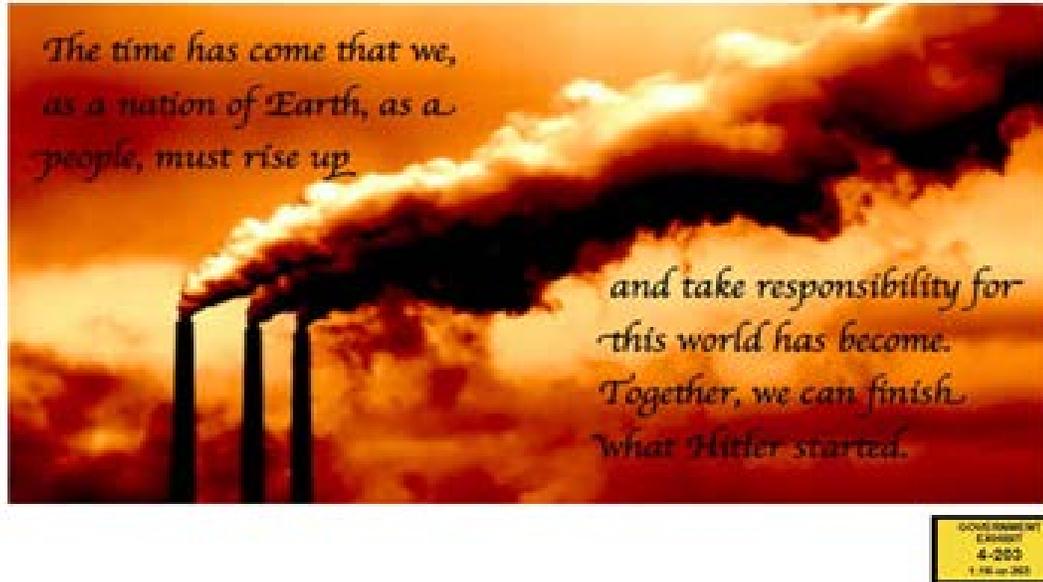


Exhibit 8 further includes:

GX 14-107, a photo found in Young's computer media in 2011 and again in 2016, showing obviously Muslim women marching with a sign stating "God Bless Hitler";

GX 10-700, a photo of a framed portrait of Hitler found in Young's residence in August 2016; and

GX 10-711: two posters found in Young's residence in August 2016, with a photo of Hitler and the words, "When I come back, no more Mr. Nice Guy."

Also included Exhibit 8 are GX 10-814 and GX 10-815. GX 10-814 is a document found among Young's possessions in August 2016, which appears to contain a list of people for whom he prayed. Along with members of his family, friends, and co-workers, the list includes five leaders from modern times: Hitler, Mussolini, Saddam Hussein, Haj Amin Al-Husaini, and "Skorzeny." GX 10-815 is a photo of Skorzeny found in Young's computer media.

As Dr. Gartenstein-Ross explains, Otto Skorzeny was a Nazi who fled Germany for Egypt after the fall of Hitler, and later organized Palestinian terrorist forays into Israel. Exhibit

1, at 34. According to his Wikipedia entry, Skornezy was believed to have set up an organization that helped hundreds of SS war criminals escape from Germany after Nazi Germany fell. *See* https://en.wikipedia.org/wiki/Otto_Skorzeny.

Exhibit 9 consists of selected trial exhibits that are probative of the hatred for Jews that is a common link between Young's support for Nazis and his predisposition to support ISIS.

GX 11-401 is a photo of the Israeli flag that Young used as a doormat for the entrance to his residence. The following exhibits were saved in Young's computer media:

GX 10-250, a cartoon with Arabic writing and depicting the American military as under the whip of a crazed Jew;

GX 10-251, a cartoon with Arabic writing and depicting Colin Powell as a puppet of a stereotypical Jew;

GX 10-252, a cartoon depicting a pig with the face of a stereotypical Jew, titled "Jewish Swine"; and

GX 14-138, a picture of a swastika imposed on an Israeli flag, with the caption "The Greatest Devil".

Exhibit 10 consists of trial exhibits that are probative of Young's affiliation with Nazism and his support for ISIS at the same time, including:

GX 706, a (redacted) roster of "5 Kompanie B 19. Panzergrenadier Rgt., reflecting that Young's alias on that roster was Stormtrooper Klaus Dusselkamp:

GX 8-500, screenshots of the Liveleak website, showing that "Dusselkamp" created the channel in 2007, and posted on it as late as May 7, 2015; and

GX 8-501, screenshots of the Liveleak website, showing that "Dusselkamp" justified the burning alive by ISIS of the captured Jordanian pilot.

In short, the evidence sampled above shows that Young's support for Nazis was intertwined with his support for Islamic extremists, and that both were motivated by hatred of Jews.

Young claims that the Nazi materials should not be admitted because the government seized only Nazi-related materials from his house, and did not seize other collectibles that Young

possessed. Whether the government cherry-picked Young's Nazi paraphernalia is a matter for argument at trial, and does not bear on their admissibility. We expect, however, that the evidence will show that (1) the only foreign leader whose birthdate Young used for his own contact information was Hitler; (2) the only framed portrait of a foreign leader from modern times that Young had in his house was Hitler's; (3) the only historical identity that Young used for postings on Liveleak in support of ISIS was Stormtrooper Klaus Dusselkamp; and (4) the only leaders from modern history included on Young's prayer list were Hitler, Mussolini, and Saddam Hussein.¹³

Young's claim that the government's evidence of his adherence to Nazi ideology is unduly prejudicial also must fail. Courts routinely admit evidence more prejudicial than that which Young challenges, including defendants' prior convictions and even serious uncharged crimes. *See, e.g., McLaurin*, 764 F.3d at 382-84 (upholding admission of defendants' prior robbery conviction and firearm possession to prove their predisposition). *See also United States v. Abu-Jihaad*, 630 F.3d 102, 132-33 (2d Cir. 2010) (upholding admission of bad-act evidence over Rule 403 objection because evidence was "no more inflammatory than the charges alleged in the indictment").

Young also argues that evidence of his pre-2010 adherence to Nazi ideology is not necessary because the government possesses evidence of his post-2010 adherence to ISIS ideology. Young's entrapment defense undercuts the logic of this argument as well. After all, Young asserts that the government must prove his predisposition before Young met Khalil in 2010 - - and ISIS was not even formed until 2014. To the extent that evidence of predisposition

¹³ In light of Young's argument that the seized Nazi material was only a fraction of his memorabilia collection, the volume and scope of the seized material is at issue. As a result, none of the Nazi material could be cumulative; all is relevant and necessary to rebut Young's claim that the Nazi-related exhibits were cherry-picked from a bigger collection of memorabilia.

before 2010 is essential to refute Young's entrapment claim, evidence of his adherence to Nazi ideology before 2010 is necessary to show predisposition. *United States v. Queen*, 132 F.3d 991, 998 (4th Cir. 1997) (evidence is necessary where, considered in the “light of other evidence available to the government,” it is an “essential part of the crimes on trial, or where it furnishes part of the context of the crime”).

The cases upon which Young relies do not support the outcome he seeks because virtually none are entrapment cases. Cases actually involving entrapment show the weakness of his argument. *See, e.g., United States v. Mohamud*, 843 F.3d 420, 434 (9th Cir. 2016) (affirming admission of evidence that the defendant supported Osama Bin Laden and the September 11 attacks); *United States v. Cromitie*, 727 F.3d 194, 212-13 (2d Cir. 2013) (affirming admission of evidence that the defendant wanted to bomb a police car); *United States v. Siraj*, 2008 WL 2675826 (2d Cir. July 9, 2008) (affirming admission of extremist videos); *United States v. Higham*, 98 F.3d 285, 291 (7th Cir. 1996) (affirming admission of defendant’s threat to ‘blow a hole through’ a victim); *United States v. Mahon*, No. 2010 WL 4038763, at *11 (D. Ariz. Oct. 14, 2010) (admitting evidence of the defendant’s allegiance to violent white supremacist groups), *aff’d*, 793 F.3d 1115 (9th Cir. 2011).

B. Evidence of Young’s Prior Transfer of Funds Overseas in Furtherance of Unlawful Conduct

Exhibit 11 consists of documents seized from Young's residence in August 2016 that establish that, long before he met a government agent, he transmitted money overseas under fake names or from a fake address. GX 10-802 is a Western Union receipt from October 21, 2005, reflecting the transfer of \$450 to Zdravko Stefanov Daskalov ("Zdravko") in Bulgaria, by Nicholas Young. The Western Union document reflects that, on that occasion, Young specified on the form his actual name and address.

GX 10-801 is another Western Union receipt, from October 30, 2008, reflecting the transfer of \$380 by Young to Zdravko. This document reflects that, this time, Young specified as his address as the fictional address of 11881 "Hellbreak" Avenue in Fairfax, Virginia. GX 10-803 is a third Western Union receipt, from August 15, 2013, reflecting the transfer of \$812 to Zdravko by "Simon Belmont." GX 10-804 is an email, dated May 12, 2004, from Zdravko to "Rudolph Van Waldron," regarding a shipment of drugs for \$134.

The relevance of these exhibits is not that they show that Young purchased illegal drugs (we make no claim about the legality of the purchases). Their relevance, instead, is that, long before Young met any government agent, he used fake names and a fake address to transmit money overseas in the course of transactions about which he did not want the government to know. Indeed, his transmittal of funds under fake names or from a fake address between 2008 and 2014 is admissible evidence of his predisposition to send money to ISIS through the Threema Application ("the Threema App") in 2016. To the extent that this evidence is "prejudicial" because it involved the purchase of drugs, any risk of prejudice could be mitigated by a limiting instruction.

C. Evidence of Possession and Dissemination of ISIS and Al Qaeda Propaganda

The videos and images of ISIS and al-Qaeda propaganda that Young possessed are central evidence of Young's predisposition to support ISIS. In addition to evidence of videos and images seized from his residence and computer media, testimony at trial will establish that, in 2014, Young showed Mo an extremist video, and that in May 2015, Young linked a jihadi video ("Screw Infidels") to his Facebook page. Such evidence is admissible to show Young's intent. *United States v. Hassan*, 742 F.3d 104, 142 (4th Cir. 2014) (in a terrorism prosecution

not involving entrapment, evidence posted by defendant Yaghi on Facebook promoting his radical and violent jihadist beliefs supported his conspiracy convictions).

As the Fourth Circuit wrote in *Hassan*, "Hassan's nefarious intentions were substantiated when, in January 2009, he instructed his paramour to remove his postings on his Facebook page as well as postings on 'Muslim Gangsta For Life,' which endorsed his radical ideology." The "Screw Infidels" video that Young posted on his Facebook page is analogous to the "Muslim Gangsta for Life" posts that Hassan posted on his own Facebook page. *Id.* at 145.

Given Young's entrapment defense, the ISIS and al-Qaeda videos and images that he possessed are indisputably relevant. *See United States v. Mehanna*, 735 F.3d 32, 62 (1st Cir. 2013) ("[T]he government's case depended on proving that the defendant's actions emanated from views that, over time, had aligned with al-Qa'ida's. The media that he consumed en route to forming those views is a salient part of the story."); *United States v. Siraj*, No. 07-0224-CR, 2008 WL 2675826, at *2 (2d Cir. July 9, 2008) ("testimony regarding a videotape Matin had given to the cooperating witness . . . was relevant to the question of inducement because it showed that Matin was already well acquainted with the type of violent and graphic material he claims the cooperating witness used to entrap him"). Young does not suggest otherwise, and claims solely that the videos and images are unduly prejudicial and that written descriptions suffice. The law is to the contrary.

For example, in *United States v. Mohamud*, 843 F.3d 420, 434 (9th Cir. 2016), the Ninth Circuit agreed that, to rebut an entrapment defense, the government was entitled to introduce evidence that the defendant supported Osama Bin Laden and the September 11 attacks, and possessed a magazine aimed at American jihadists. In *United States v. El-Mezain*, 664 F.3d 467, 509-11 (5th Cir. 2011), the Fifth Circuit agreed that, to rebut the defendants' denial that they

supported Hamas, the government was entitled to introduce evidence seized from the defendants' offices, including images of violence and videos glorifying Hamas and depicting Hamas leaders. *Id.* at 509–11.¹⁴

Similarly, in Young's case, evidence of ISIS videos serves a vital purpose: to rebut his claim that he was not predisposed to support ISIS. As the court in *El-Mezain* concluded, the high probative value of this evidence outweighs the risk of undue prejudice to Young.¹⁵

Young cites *United States v. Abu-Jihaad*, 553 F. Supp. 2d 121, 128 (D. Conn. 2008), as a decision “excluding mujahideen fighting videos insofar as they contained extreme violence, bloody bodies and mutilation.” Def. Memo at 43. *Abu-Jihaad* is not an entrapment case, but Young's characterization of it is misleading anyway. There, the court *admitted* videos depicting “fighting between the mujahideen and Russian troops, replete with numerous explosions, shootings, and dead soldiers as well as Muslim fighters,” and “glorify[ing] martyrdom and also the killing of non-believers.” *Abu-Jihaad*, 553 F. Supp. 2d at 128. While the court did direct the government to edit the videos to remove some particularly gruesome images, it held that “it is difficult—if not impossible—for the Government to give the jury an accurate sense of the nature

¹⁴ Like Young, the defendants in *El-Mezain* engaged in terrorist *financing* but not terrorist violence themselves. “Although this case relates to terrorism, it does not involve charges of specific terrorist acts. Instead, it focuses on the defendants' financial support for terrorism and terrorist ideology.” *El-Mezain*, 664 F.3d at 483.

¹⁵ In so holding, the *El-Mezain* court rejected the defendants' undue prejudice objections, which relied on *United States v. Al-Moayad*, 545 F.3d 139 (2d Cir. 2008) - - a case that Young also cites. In *Al-Moayad*, the court held that testimony from a victim of a Hamas bomb attack on a bus and images of the aftermath of the attack were not admissible under Rule 403. The court reached that ruling because the government offered this evidence to show the defendants' knowledge that Hamas engaged in terrorist activity, even though the defendants never denied such knowledge. 545 F.3d at 160. In Young's case, however, the issue in this case is not whether he knew that ISIS engaged in terrorist activity - - because he indisputably did - - but whether he *supported* such activity.

of these videos without playing for the jury some of the violent and graphic portions of the videos. Otherwise, the jury would have an inaccurate sense of their content.” *Id.*

On appeal, the Second Circuit upheld the admission of the videos, holding that “[a]lthough these excerpts included depictions of violence, as was necessary not to distort the sense of the films as a whole, the depictions were limited and, as the district court accurately observed, less gruesome than many seen on nightly news dispatches from Baghdad.” *United States v. Abu-Jihaad*, 630 F.3d 102, 133–34 (2d Cir. 2010) (also holding that extremist material from websites the defendant visited was properly admitted). *Accord United States v. Pugh*, 162 F. Supp. 3d 97, 117–18 (E.D.N.Y. 2016) (in a non-entrapment case, admitting edited videos of ISIS executioners, because the “nature and content” of the videos spoke strongly to the defendant’s “state of mind”). Given this precedent and the fact that Young has elected to pursue an entrapment defense, the ISIS and al-Qaeda videos and images are properly admitted to show Young’s predisposition.

D. Evidence of Young’s Possession of Islamic Nasheeds and White-Power Music

Young argues that the government should be precluded from playing his music on grounds of relevance and prejudice. He suggests that, at most, the relevance of the music would lie in the fact that he possessed it. Young’s Br. at 24. We plan to introduce evidence that Young possessed certain music, but do not seek to play any. Exhibit 12 contains GX 10-304, a photo of Young’s iPod, which reflects that, among Young’s music selections, were “ISIS Techno Remix” and “Jihad Nasheed.” That evidence surely is probative of his predisposition. *See, e.g., United States v. Magleby*, 241 F.3d 1306, 1319 (10th Cir. 2001) (finding that probative value of racist song lyrics on white supremacist CD owned by the defendant outweighed prejudicial effect and were properly admitted in civil rights case because defendant’s state of mind was at issue).

E. Young's Statement of Desire to Join ISIS in Order to Obtain a Slave

Young seeks to bar evidence of his desire to acquire a slave. That evidence is admissible because, troubling as it may be, the prospect of obtaining a slave was one of Young's motivations for supporting ISIS. *See United States v. Mostafa*, 16 F.Supp.3d 236, 258, 268 (S.D.N.Y. 2014) (evidence that the defendant justified enslaving captives was admissible even in a case *not* involving entrapment). As the court found in *Mostafa*, Young's own statement is admissible because it is "no more prejudicial than that with which he has already been charged." *Id.* at 258. By claiming entrapment, Young placed his intent at issue, and his own statements are admissible to prove his intent.

In addition to showing Young's predisposition, the evidence of Young's desire to acquire a slave is admissible because it is inextricably intertwined with evidence of other communications that Young had with Mo.¹⁶ As the Fourth Circuit has explained, "evidence of uncharged other acts is intrinsic and not subject to Rule 404 if the acts arose out of the same series of transactions as the charged offense or if the evidence of the uncharged conduct is necessary to complete the story of the crime on trial." *United States v. Day*, 700 F.3d 713 (4th Cir. 2012). Such evidence is *direct* evidence of a crime.

Much of the evidence to which Young objects is inextricably intertwined with the evidence of the offenses charged against him. For example, Exhibit 13 reflects that Young used the Threema App on July 30, 2016, to tell Mo about Young's desire to acquire a slave¹⁷ - - and

¹⁶ More precisely, the evidence of Young's desire to acquire a slave is admissible because it is inextricably linked with evidence of other communications that Young had with the accounts that were controlled by the FBI - - but which Young *thought* were controlled by Mo.

¹⁷ "To be honest, I would like to buy a slave. . seriously, lol, but I heard the supply is low. . inshallah a large crop of Alawi women will fall into the hands of the mujahideen."

then immediately wrote that the local mosques were "corrupt" because they preached that "the jihad is within ourselves, jihad of the pen, blah blah blah, the usual emotional stuff, zero evidence." Young's derogation of the local mosques as "corrupt" because they did not interpret "jihad" necessarily to entail violence surely is probative of his predisposition to support ISIS - - but that derogation exists on the same screen shot that contains the statements that he made about desiring a slave in the same message. Further, as seen in Exhibit 10, GX 8-504, under the identity of "Dusselkamp," Young posted on Liveleak in December 2014, his agreement that mujahideen were authorized to take "wives" from among their captives. Regardless of how disturbing they are, Young's relevant statements about slaves simply cannot be disentangled from his other relevant statements, and are intrinsic to the case against him.

F. Young's Statement of Desire to Kidnap and Torture an FBI Agent

Young challenges the admission of his statements to Khalil that he wanted to kidnap and sexually torture a female FBI special agent who previously interviewed him. These statements evidence his intent and are probative of predisposition.

In addition to proving Young's predisposition, this evidence is relevant for several related reasons. First, Young asserts that this prosecution is the continuation of an unfair focus on him that started in 2011 - - but Khalil's report to the FBI regarding Young's stated desire to kidnap an FBI agent was (not surprisingly) a factor in triggering that focus; to the extent that Young argues that the focus on him was unfair, we must be permitted to provide the context for that focus.

Second, in light of Young's claim of entrapment, Khalil's credibility is at stake. Khalil's credibility is enhanced, however, by the fact that the FBI found on Young's computer a photograph of the agent that (Khalil reported that) Young said that he wanted to kidnap. Third,

Young's musings about kidnapping and sexually torturing the agent is akin to his musings about attacking FBI generally, and corroborates other testimony on that point.

Statements of defendants' desire to attack law enforcement are routinely admitted to prove their predisposition. *See, e.g., United States v. Cromitie*, 727 F.3d 194, 212-13 (2d Cir. 2013) (holding that defendant's statement, "I would actually like to put a fucking bomb in the back of a cop car while he's sitting in the motherfucker and watch him just explode, I would be the most happiest person in the world," was properly admitted to prove predisposition in case where defendant claimed entrapment. *See also United States v. Hassan*, 742 F.3d 104, 143 (4th Cir. 2014) (in a terrorism prosecution not involving entrapment, discussions regarding the kidnapping of a Marine officer supported the defendant's terrorism conspiracy conviction); *Mostafa*, 16 F. Supp. 3d at 267, admitting defendant's statements evincing a desire to kidnap non-Muslims). Because Young's statements to Khalil about kidnapping an FBI agent has significant probative value, it should admitted to establish predisposition.

G. Evidence of Prior Statements About Attacking Law Enforcement, Violence Against Informants, Firearms Training, and Counter-Surveillance Measures

Young also moves to exclude several instances of his statements and conduct which are relevant and should be admitted to prove his predisposition. These include:

- a) Suggesting that he and Khalil pour gasoline on FBI cars and light them;
- b) Recounting to Khalil how Young aimed a rifle out of the window of his residence while scanning for law enforcement;
- c) Telling Khalil that someone with Young's skills could attack the FBI; and
- d) Describing to Khalil a method by which Young could smuggle weapons into the Alexandria Federal Courthouse so that they could be passed to confederates undetected.

All properly should be admitted as evidence of predisposition. *Cromitie*, 727 F.3d at 212-13 (statements of desire to bomb police car, airport, and synagogue were proper evidence of predisposition); *United States v. Hassan*, 742 F.3d 104, 143 (4th Cir. 2014) (in a terrorism prosecution not involving entrapment, discussions regarding how a person could easily gain entry into an American military facility as a truck driver supported defendant's conviction).

Prior threats of violence - - such as Young's statement to Khalil that, if he ever were betrayed by someone, that person's life expectancy would be greatly diminished - - also properly should be admitted to show predisposition. *See, e.g., United States v. Higham*, 98 F.3d 285, 291 (7th Cir. 1996) (upholding admission of evidence of defendant "putting gun in the side of a man and threatening to 'blow a hole through [him]'" to prove predisposition in prosecution of defendant for hiring someone to commit murder for him).

Finally, Young's consciousness of government surveillance - - such as Young's statement that he was wary of government surveillance, his aiming an AK-47 style rifle out of the window of his residence while scanning for law enforcement, and his possession of disposable cell phones - - also is properly admissible to show his predisposition. *See, e.g., United States v. Ham*, 944 F.2d 902 *2 (4th Cir. 1991) (Table) (upholding admission of evidence to prove predisposition that defendant's residence was found stocked with attack dogs, five firearms, and a surveillance camera); *United States v. Gonzalez*, 19 F.3d 1169, 1173 (7th Cir. 1994) (citing, as evidence of predisposition, defendant's detection of government surveillance).¹⁸

¹⁸ With respect to additional items listed by Young in his motion, animal abuse and a traffic ticket were part of conversations that Young had with Khalil. To refute allegations that Khalil entrapped him, Khalil should be able to testify as to all of their conversations. That being said, we do not plan to introduce the ticket itself in our case-in-chief. With respect to sexual preference, we do not plan to present evidence on that topic (aside from possibly presenting testimony on other subjects from witnesses who were Young's ex-girlfriends).

Report on the Relationship between Affinity for Nazism and Inclination to Support Militant Islamist Groups – United States v. Nicholas Young

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My full name is Daveed Eliahu Ephraim Gartenstein-Ross. I am a scholar, practitioner, and author with around twenty years of professional experience and educational study examining violent non-state actors (VNSAs), with a particular focus on the movement that self-identifies as *salafi jihadism*, as well as U.S.-based militant white separatist groups.

I am the Chief Executive Officer of Valens Global, a private commercial entity that focuses on the challenges posed by VNSAs. I also hold appointments at think tanks in the United States and Europe. I have been a Senior Fellow at the Foundation for Defense of Democracies (FDD), a nonpartisan policy institute in Washington, D.C., for over a decade.¹ I am also an Associate Fellow at the International Centre for Counter-Terrorism – The Hague (ICCT). I have authored several studies for ICCT, some of which required international field research. Studies I wrote for ICCT include reports on the Tunisian jihadist group Ansar al-Sharia, a history of the Libyan civil war, and a review of how the Islamic State's (ISIS) propaganda plays a role in its strategy for global expansion.² I also recently served a term as a Fellow at Google's think tank Jigsaw, for which I led several major research projects examining extremists' use of online platforms, and what can be done to counter them.³

¹ For a sense of the work I have done for FDD, see the following books and studies that I authored for the institute, or for which I served as a volume editor: Daveed Gartenstein-Ross et al., *Islamic State 2021: Possible Futures in North and West Africa* (Washington, DC: FDD Press, 2017); Daveed Gartenstein-Ross et al., *China's Post-2014 Role in Afghanistan* (Washington, DC: FDD Press, 2014); Daveed Gartenstein-Ross & Jonathan Schanzer eds., *Allies, Adversaries and Enemies: America's Increasingly Complex Alliances* (Washington, DC: FDD Press, 2014); Daveed Gartenstein-Ross & Daniel Trombly, *The Tactical and Strategic Use of Small Arms by Terrorists and Terrorist Groups* (Washington, DC: FDD Press, 2012); Daveed Gartenstein-Ross & Linda Frum eds., *Terror in the Peaceable Kingdom: Understanding and Addressing Violent Extremism in Canada* (Washington, DC: FDD Press, 2012).

² See Daveed Gartenstein-Ross, *Ansar al-Sharia Tunisia's Long Game: Dawa, Hisba, and Jihad* (The Hague: ICCT – The Hague, 2013); Daveed Gartenstein-Ross, Bridget Moreng & Kathleen Soucy, *Raising the Stakes: Ansar al-Sharia in Tunisia's Shift to Jihad* (The Hague: ICCT – The Hague, 2014); Daveed Gartenstein-Ross & Nathaniel Barr, *Dignity and Dawn: Libya's Escalating Civil War* (The Hague: ICCT – The Hague, 2015); Daveed Gartenstein-Ross, Nathaniel Barr & Bridget Moreng, *The Islamic State's Global Propaganda Strategy* (The Hague: ICCT – The Hague, 2016).

³ Much of the work I undertook for Jigsaw/Google is confidential, but one project, the Redirect Method, has been made public. See Andy Greenberg, "Google's Clever Plan to Stop Aspiring ISIS Recruits," *Wired*, September 7, 2016, at <https://www.wired.com/2016/09/googles-clever-plan-stop-aspiring-isis-recruits/>. As Greenberg explains, the program

I have experience teaching at the university level, in both graduate and undergraduate programs. From 2013-17, I held an appointment as an Adjunct Assistant Professor in Georgetown University's Security Studies Program, where I taught a course on Violent Non-State Actors. (I was invited to continue teaching in the 2017-18 school year, but declined because my family moved away from the D.C. area.) I previously served as a Lecturer for graduate and undergraduate classes at the Catholic University of America, where I taught courses on Violent Non-State Actors, and on Al-Qaeda and Its Affiliates. I have also taught classes for, or held faculty appointments at, the University of Southern California (teaching from 2013-present for the school's Executive Program in Counter-Terrorism) and the University of Maryland (Faculty Research Assistant in the Institute for Advanced Computer Studies, 2013-14).

I hold a Ph.D. in World Politics from the Catholic University of America, a J.D., *magna cum laude*, from the New York University School of Law, and a B.A. with Honors, *magna cum laude*, from Wake Forest University.

In addition to my education and professional work, I spent the better part of a year immersed in a charity organization that actively propagated salafi jihadist ideas, and was connected to the international salafi jihadist movement. As an idealistic young college student who was seeking deeper spiritual fulfillment, I converted to the Islamic faith in my early twenties. I was looking for employment between college and law school (a period stretching from December 1998 through August 1999), and applied for a position at an Islamic charity organization, the Al Haramain Islamic Foundation, located in my hometown of Ashland, Oregon. When I took the job, I did not realize that it was part of a broader salafi jihadist charitable front with offices throughout the globe, and multiple layers of connection to the al-Qaeda terrorist organization. Both Al Haramain's head office and also the branch that I worked for were ultimately designated as terrorist organizations.⁴ My time working for the charity and my inner struggles with the extremist ideas that Al Haramain was propagating internally are documented in my first book, *My Year Inside Radical Islam*.⁵ Though I moved away from extremist Islam, and ultimately from the Islamic faith itself, this

places advertising alongside results for any keywords and phrases that Jigsaw has determined people attracted to ISIS commonly search for. Those ads link to Arabic- and English-language YouTube channels that pull together preexisting videos Jigsaw believes can effectively undo ISIS's brainwashing—clips like testimonials from former extremists, imams denouncing ISIS's corruption of Islam, and surreptitiously filmed clips inside the group's dysfunctional caliphate in Northern Syria and Iraq.

The website that Jigsaw set up to explain the Redirect Method can be found at <https://redirectmethod.org/>. I led Valens Global's efforts to map the counter-extremist narrative space on YouTube for this project.

⁴ See U.S. Department of the Treasury, press release, "U.S.-Based Branch of Al Haramain Foundation Linked to Terror: Treasury Designates U.S. Branch, Director, September 9, 2004," <https://www.treasury.gov/press-center/press-releases/Pages/js1895.aspx> (designating U.S. branch of Al Haramain); U.S. Department of the Treasury, press release, "Treasury Designates Al Haramain Islamic Foundation," June 19, 2008, <https://www.treasury.gov/press-center/press-releases/Pages/hp1043.aspx> (designation of the head office). In addition to being named a Specially Designated Global Terrorist, the branch that I worked for pled guilty to tax fraud related to a transfer of \$150,000 to Chechnya. See U.S. Attorney's Office, District of Oregon, press release, "Specially Designated Global Terrorist Al-Haramain Islamic Foundation, Inc. Pleads Guilty to Tax Fraud," July 29, 2014, <https://www.justice.gov/usao-or/pr/specially-designated-global-terrorist-al-haramain-islamic-foundation-inc-pleads-guilty>.

⁵ Daveed Gartenstein-Ross, *My Year Inside Radical Islam: A Memoir* (New York: Tarcher/Penguin, 2007).

experience would do a great deal to shape my future passion for keeping America and its interests safe from the scourge of terrorism. The experience also provided me with a further, unique window into salafi jihadism and radicalization to violent extremist ideas.

I have three interlocking areas of competency that are relevant to the present case. The first area pertains to violent extremist movements claiming their inspiration from Islam (referred to herein as *Islamist militancy*, indicating these groups' goal of violently imposing their particular version of religious law, or *sharia*). Beginning around 1998, I have frequently traveled overseas to do professional work or conduct field research in multiple countries that are relevant to understanding transnational jihadism, including Iraq, Israel, Nigeria, Tunisia, Turkey, Qatar, and the United Arab Emirates. I have reviewed thousands of open-source documents about Islamist militancy, and I have served as a consultant and expert on terrorism and national security issues for the U.S., Canadian and Dutch governments, the European Union, NATO, and private organizations. In the course of this work, I have been certified by governmental bodies as a subject matter expert (SME) on terrorism and Islamist militant groups on multiple occasions, including for the following projects:

- serving as a co-principal investigator for a three-year, \$1.5 million project for the Office of Naval Research, using a big-data approach to analyze relationships among Islamist militants to predict where splits are likely occur within these organizations;
- designing and delivering training for officials and analysts at U.S. Customs and Border Protection (CBP), for which I am currently the lead SME on a contract to deliver training services for CBP for a twelve-month period from 2016-17;
- separate from the training contract, serving as a SME on terrorism and VNSAs for CBP, a contract for which I began performance on May 1, 2017;
- serving as a Senior Advisor to the U.S. Department of Homeland Security's Office for Community Partnerships, which is a leading agency involved in domestic work related to countering violent extremism (CVE);
- designing and delivering training on global terrorism for the U.S. Army Corps of Engineers' Individual Terrorism Awareness Course (INTAC), for which I have been the lead instructor since June 2016;
- lecturing for U.S. Army units about to deploy to countries such as Djibouti, Egypt, Iraq, Jordan, Kuwait and Afghanistan—as well as for foreign militaries, including in Bulgaria, Croatia and Poland—through the Naval Postgraduate School's Leader Development and Education for Sustained Peace (LDESP) program, for which I taught on over 70 occasions from 2009-17;
- serving as a SME providing information and analysis to the Joint Improvised-Threat Defeat Organization (JIDO) on four different occasions, including projecting the aftermath of ISIS's advances in Iraq, and analyzing the future of the Libyan civil war;
- serving as a SME for the U.S. Department of State's Office of Anti-Terrorism Assistance, designing curriculum and leading instruction for that organization;
- leading training for the Anti-Terrorism Advisory Council (ATAC) on four separate occasions;
- organizing and facilitating a conference in Nigeria, as a European Union-appointed Strategic Communication Expert, helping civil society activists understand militant

groups' use of social media (particularly that of Boko Haram) and forge a strategic action plan for countering it.

I have also been court-certified to serve as an expert witness on terrorism and Islamist militant groups in the following federal cases:

- *Foley v. Syrian Arab Republic* (D.D.C., 2017), where I served as an expert witness on Abu Musab al-Zarqawi's terrorist organization;
- *In the Matter of Abdul Qadir* (Arlington, Va. Immigration Court, 2015), where I served as an expert witness on Afghanistan's Taliban;
- *In the Matter of B.O. in Removal Proceedings* (Boston Immigration Court, 2012), where I served as an expert witness on al-Qaeda's activities and capabilities in Kenya; and
- *In the Matter of A.D.* (Memphis, Tenn. Immigration Court, 2012), *In the Matter of A.A.W.* (Bloomington, Minnesota Immigration Court, 2012), *In the Matter of A.A.I.* (Colorado Immigration Court, 2011), *In the Matter of the Application for Withholding of A.A.M.* (Boston Immigration Court, 2011), and *In the Matter of the Application for Asylum of M.A.A.* (N.J. Immigration Court, 2009), for all of which I served as an expert witness on the Somali group al-Shabaab.

In addition to the aforementioned work which required certification as an expert, other professional work I have undertaken related to VNSAs and Islamist militancy includes serving as a Subject Matter Consultant to the private security firm Corporate Risk International for a live hostage negotiation with the Iraqi militant group Asa'ib Ahl al-Haq; producing reports for firms in the oil and gas industry that need to make investment decisions related to VNSAs, or protect their facilities and personnel; and designing and leading strategic simulations exploring the competition between VNSAs and state actors for academic institutions like Johns Hopkins University. I have testified about my areas of core competency before the U.S. House and Senate more than a dozen times, as well as before the Canadian House of Commons.

Additionally, I am an author with specialized knowledge in the field of VNSAs and militant Islamism. I am the author or volume editor of twenty-two books and monographs, and I have written on these topics in peer-reviewed academic publications and the mainstream press. This work is outlined in my Curriculum Vitae, but some relevant selections include:

Books and Monographs

- *Islamic State 2021: Possible Futures in North and West Africa* (with J. Zenn and N. Barr), Foundation for Defense of Democracies, 2017.
- *The Islamic State's Global Propaganda Strategy* (with N. Barr and B. Moreng), ICCT – The Hague, 2016.
- *The War between the Islamic State and al-Qaeda: Strategic Dimensions of a Patricidal Conflict* (with J. Fritz, B. Moreng and N. Barr), Valens Global, report produced for U.S. Special Operations Command Central (SOCCENT), 2015.
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- "MENA Countries' Responses to the Foreign Fighter Phenomenon," in A. de Guttry et al. eds., *Foreign Fighters Under International Law and Beyond* (The Hague: T.M.C. Asser Press, 2016).
- "The Evolution of Post-Ben Ali Tunisian Jihadism," in A. Celso & R. Nalbandov eds., *The Crisis of the African State* (Quantico, Va.: Marine Corps University Press, 2016).
- "The Genesis, Rise, and Uncertain Future of al-Qaeda," in R. Law ed., *The Routledge History of Terrorism*, Routledge, 2015.
- "Violent Non-State Actors in the Afghanistan-Pakistan Relationship," in C. Fair & S. Watson eds., *Pakistan's Challenges*, University of Pennsylvania Press, 2015.
- "The Legacy of Osama bin Laden's Strategy," in David Kamien ed., *The McGraw-Hill Homeland Security Handbook*, McGraw-Hill, 2012.

Academic and Technical Publications

- "Violent Non-State Actors in the Age of Social Media: A Twenty-First Century Problem Requires a Twenty-First Century Toolkit," *Georgetown Security Studies Review*, special issue, February 2017.
- "How al-Qaeda Survived the Islamic State Challenge" (with N. Barr), *Current Trends in Islamist Ideology* (Hudson Institute), August 30, 2016.
- "Recent Attacks Illuminate the Islamic State's Europe Attack Network" (with N. Barr), *Jamestown Foundation*, April 27, 2016.
- "Tunisian Jihadism After the Sousse Massacre" (with B. Moreng), *CTC Sentinel*, October 2015.
- "The Role of Iraqi Tribes after the Islamic State's Ascendance" (with S. Jensen), *Military Review*, July-August 2015.
- "A Critical Link between Jabhat al-Nusra and al-Qaeda: Abu Humam al-Suri," *Militant Leadership Monitor* 6:5 (May 2015).
- "Al-Shabaab's Insurgency in Somalia: A Data-Based Snapshot" (with H. Appel), *Georgetown Journal of International Affairs*, April 3, 2014.
- "Perceptions of the 'Arab Spring' Within the Salafi Jihadi Movement" (with T. Vassefi), *Studies in Conflict & Terrorism* 35:12, November 2012.

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- "Terrorists Are Using Drones Now. And That's Not the Worst of It," *Fortune*, September 9, 2017.
- "The Manchester Attack Shows How Terrorists Learn," *The Atlantic*, May 23, 2017.
- "Lone Wolves No More," *Foreign Affairs*, March 27, 2017.
- "ISIL's Virtual Planners: A Critical Terrorist Innovation," *War on the Rocks*, January 4, 2017.
- "A Grim Anniversary: 15 Years after 9/11, the War against Radical Islamist Terrorism is not Looking Good," *New York Daily News*, September 11, 2016.
- "Rebranding Terror" (with T. Joscelyn), *Foreign Affairs*, August 28, 2016.

- “Bloody Ramadan: How the Islamic State Coordinated a Global Terrorist Campaign,” *War on the Rocks*, July 20, 2016.
- “Boko Haram’s Buyer’s Remorse” (with J. Zenn), *Foreign Policy*, June 20, 2016.
- “Sunni Tribes Need Arms and Support to Fight ISIS,” *New York Times*, June 1, 2015.
- “From Westgate to Garissa, Shabaab’s Murderous Wave,” *Foreign Policy*, April 10, 2015.
- “Zawahiri’s Revenge,” *Foreign Policy*, July 31, 2014.
- “The Jihadist Governance Dilemma” (with A. Magen), *Washington Post* (Monkey Cage blog), July 18, 2014.
- “Al-Qaeda in Iraq and the Abu Ghraib Prison Break,” *Project Syndicate*, July 23, 2013.

I have also spoken at numerous events and conferences throughout the globe. Presentations and conference papers that I have delivered include:

- “Sixteen Years After 9/11: Assessing the Terrorist Threat” (panel), New America Foundation, Washington, D.C., September 11, 2017.
- “The Jihadist Landscape in South Asia,” Near East South Asia Center, National Defense University, Washington, D.C., August 14, 2017.
- “Change or Continuity Since 2014: ISIS in Global Context” (panelist), The Evolving Terrorist Threat conference, The RAND Corporation, Arlington, Va., June 27, 2017.
- “Terrorism in 2020” (panelist), Department of Defense Combating Terrorism Intelligence Conference, Reston, Va., May 9, 2017.
- “What Next?: Regional Trends and Threats,” Conference on What the New Administration Needs to Know About Terrorism & Counterterrorism, Georgetown University Center for Security Studies and St Andrews University Handa Centre for the Study of Terrorism and Political Violence, Washington, D.C., January 26, 2017.
- “How Does It All End?” workshop, panelist, National Counterterrorism Center (NCTC), McLean, Va., January 12-13, 2017.
- Keynote speech, After ISIL: Stability and Spillover, sponsored by U.S. Army Special Operations Command and the Laboratory for Unconventional Conflict & Simulation (LUCAS), Duke University, Durham, N.C., December 2, 2016.
- “The Future of Violent Extremism,” Executive Program in Counter-Terrorism, CREATE center, University of Southern California, Los Angeles, August 3, 2016.
- “The Competition between the Islamic State and al-Qaeda,” Kazakhstan Institute for Strategic Studies, Astana, Kazakhstan, March 2, 2016.
- “The Competition between the Islamic State and al-Qaeda: Implications for Regional States and the Future of the Jihadist Movement,” NATO Advanced Research Workshop, Brussels, October 6, 2015.
- “The ISIS Campaign in Anbar,” National Defense University, Washington, D.C., October 20, 2014.
- “Terrorism and the United Arab Emirates,” National Defense College, Abu Dhabi, September 14, 2014.
- “Tunisia and Ansar al-Sharia: Foreign Fighters and the Evolution of a Jihadist Group,” Combating Terrorism Working Group, Brussels, April 24, 2014.
- “Ansar al-Sharia’s War with Tunisia,” International Centre for Counter-Terrorism – The Hague, Netherlands, February 20, 2014.

- “Violent Non-State Actors: Strategies and Tactics in Addressing the Problem,” Centre for Public Policy Research, Kochi, India, December 6, 2013.
- “Afghanistan After the United States Drawdown,” O.P. Jindal Global University, Sonapat, India, December 4, 2013.
- “Ansar al-Sharia Tunisia’s Long Game: Dawa, Hisba, and Jihad,” Association for the Study of the Middle East and Africa Annual Conference, Arlington, Va., November 22, 2013.
- “Ansar al-Sharia Tunisia: *Dawa, Hisba, and Jihad*,” International Centre for Counter-Terrorism – The Hague, Brussels, Belgium, April 19, 2013.
- “Dispatches from Mali,” discussion sponsored by *Foreign Policy* and the Pulitzer Center on Crisis Reporting, Washington, D.C., January 30, 2013.
- “Why Are Consensus Views So Often Wrong in Regional Security Studies?,” United States Naval Academy Africa Forum, Annapolis, Md., October 17, 2012.
- “The Arab Spring, Organizational Resiliency, and a New Operating Environment: Al-Qaeda’s Outlook 2012,” Defense Intelligence Agency Speaker Series, Washington, D.C., July 31, 2012.
- “Combating Olympic Terrorism: National and International Lessons,” Potomac Institute for Policy Studies, Arlington, Va., July 25, 2012.
- “The Arab Awakening and the Future of al-Qaeda,” Woodrow Wilson International Center for Scholars, Washington, D.C., May 10, 2012.
- “Al-Qaeda After bin Laden,” School of Advanced International Studies, Johns Hopkins University, Washington, D.C., February 21, 2012.

A second relevant area of competency is my work on the militant white separatist and neo-Nazi movement. My writings on the subject include two technical publications written for the Foundation for Defense of Democracies (“Leadership vs. Leaderless Resistance” and “Assessing the Militant White Separatist Movement”), as well as popular press publications about the alliance between segments of the neo-Nazi and militant Islamist movements (including the article “The Peculiar Alliance” in the *Weekly Standard*, and a review of George Michael’s seminal book *The Enemy of My Enemy*).

Work I have performed for government bodies as a certified expert has also covered white separatism and neo-Nazism. I have designed two training courses for the U.S. Department of State’s Office of Anti-Terrorism Assistance—“Mitigating Prison Inmate Radicalization” and “Terrorism: Overview, Motives, and Methodologies”—that featured substantive discussion of the white separatist and neo-Nazi movement. And as previously noted, since June 2016 I have been the lead instructor for the U.S. Army Corps of Engineers’ Individual Terrorism Awareness Course (INTAC). That course has featured a substantive discussion of white separatism in its unit on the U.S. Department of Defense’s Northern Command geographic area (NORTHCOM).

A third relevant area of competency is the work I have undertaken on radicalization processes. My work on radicalization has focused in particular on the role played by the Internet and the online jihadist milieu—a focus that is relevant to the large number of Internet-focused pieces of evidence in the present case. My aforementioned work as a Senior Advisor to the U.S. Department of Homeland Security’s Office for Community Partnerships (OCP) fundamentally related to the challenge of radicalization, as the purpose of CVE—which OCP is charged with advancing

domestically—is reducing instances of radicalization and empowering communities to recognize the danger signs. Furthermore, the projects I have undertaken for Jigsaw/Google involve providing technical expertise related to identifying and countering radicalization in the online sphere.

I was the lead author of a study that is frequently cited in the academic literature on the topic (*Homegrown Terrorists in the U.S. and U.K.: An Empirical Examination of the Radicalization Process*, 2009). Brian Michael Jenkins, a senior advisor to the president of the RAND Corporation and one of this country’s preeminent scholars of terrorism, wrote about this study:

Unless we can find ways to blunt the narrative of our terrorist foes, impede their recruiting, and discourage young men (and women) from destructive and self-destructive trajectories, terrorism will drain our resources, drag on our economy, and, yes, ultimately imperil our democracy. But in order to formulate intelligence and appropriate strategies to prevent this, we must understand better the process of radicalization and recruitment to terrorism. With this research, Gartenstein-Ross and Grossman significantly further that understanding.

I have testified before the U.S. House and Senate on the topic of radicalization three times, wrote an academic article (for the German journal *Der Bürger im Staat*) on radicalization in the U.S., and have published reviews of many the major academic works on the topic. Here are relevant publications of mine on radicalization, de-radicalization, and countering extremist ideologies:

- *Homegrown Terrorists in the U.S. and U.K.: An Empirical Examination of the Radicalization Process* (Washington, DC: FDD Press, 2009).
- “Lone Wolf Islamic Terrorism: Abdulhakim Mujahid Muhammad (Carlos Bledsoe) Case Study,” *Terrorism and Political Violence* 26:110-28 (2014).
- “Islamistischer Terrorismus in den USA: ‘Homegrown Terrorism’ in den Vereinigten Staaten: Bedrohung, Ursachen und Prävention,” *Der Bürger im Staat* (Germany), Winter 2011.
- “Save the Terrorism Prevention Toolkit” (with G. Selim), *War on the Rocks*, August 28, 2017.
- “Fixing How We Fight the Islamic State’s Narrative” (with N. Barr), *War on the Rocks*, January 4, 2016.
- “Prominent European Islamic Terrorist Renounces Extremism,” *The Atlantic*, October 19, 2010.
- “The Danger Signs of Terror,” *National Post* (Canada), November 24, 2009.
- “How Do They Radicalize Others?,” *Washington Times*, June 20, 2009.
- “Changing Minds,” *Washington Times*, February 22, 2007.
- Book review, Ramón Spaaij, *Understanding Lone Wolf Terrorism*, in *War on the Rocks*, October 27, 2014.
- Book review, Clark McCauley & Sophia Moskelenko, *Friction*, in *Pragati*, November 2, 2012.
- Book review, Assaf Moghadam, *The Globalization of Martyrdom*, in *Association for the Study of the Middle East and Africa Book Notes*, October 15, 2010.
- Book review, Tore Bjørgo & John Horgan eds., *Leaving Terrorism Behind*, in *Association for the Study of the Middle East and Africa Book Notes*, April 14, 2010.

- Book review, Alan B. Krueger, *What Makes a Terrorist: Economics and the Roots of Terrorism*, in *Association for the Study of the Middle East and Africa Book Notes*, 2009.
- Book review, Marc Sageman, *Leaderless Jihad*, in *Middle East Quarterly*, Summer 2009.
- Book review, Quintan Wiktorowicz, *Radical Islam Rising*, in *Middle East Quarterly*, Winter 2009.

Here is a selection of relevant presentations I have delivered on radicalization, deradicalization, and countering extremist ideologies:

- “Countering Violent Extremism,” presenter and panelist, Homeland Security Training Institute, College of DuPage, Glen Ellyn, Ill., March 29, 2017.
- “Counterterrorism/Extremism and the Internet Challenge,” respondent, Quad-Plus Dialogue, hosted at the Heritage Foundation, Washington, D.C., March 1, 2017.
- “The Growing Challenge,” keynote address, Social Media Narratives and Extremism Workshop, sponsored by the Near East South Asia Center, National Defense University, Casablanca, Morocco, August 16-17, 2016.
- “As the Rest of the World Gets Online: Implications for Militant Groups, Stability, and Social Change,” keynote speech, Transportation Security Administration (TSA) Intel Talk series, Arlington, Va., July 13, 2016.
- “Transnational Terrorism, Foreign Fighters and Youth Radicalization,” Developing Strategies to Address Contemporary Security Challenges on Europe’s Southern Flank, George C. Marshall European Center for Security Studies, Garmisch, Germany, May 10, 2016.
- “Cyber Technology Roles and Trends in Radicalization,” keynote presentation, U.S. Army Special Operations Command Commander’s Conference, West Point, N.Y., May 4, 2016.
- “Intellectual Frameworks for Counter-Messaging,” U.S. Special Operations Command Central (SOCCENT), January 26, 2016.
- “On Tribalism, Jihadists, and Lone Wolf Political Violence,” panel, Understanding the Extremist Threat workshop, Institute for National Strategic Studies, Washington, D.C., March 11, 2015.
- “Africa’s Youth in the Age of Extremism,” panelist, National Committee on American Foreign Policy, New York City, September 26, 2013.
- “Lone Wolf Islamic Terrorism: Abdulhakim Mujahid Muhammad (Carlos Bledsoe) Case Study,” Lone Wolf and Autonomous Cell Terrorism, conference at Uppsala University, Uppsala, Sweden, September 25, 2012.
- “Islamist Radicalization,” U.S. Marine Corps Command and Staff College, Quantico, Va., February 22, 2012.
- “Terrorist Use of the Internet,” National Counterterrorism Center, Conference on al-Qaeda and the Global Threat, Warrenton, Va., July 28, 2011.
- “Ideas, Identity, and Terror,” keynote speech, The Impact of Identity Politics on Violent Extremism: Regional Perspectives, Global Futures Forum, Monterey, Calif., April 7, 2011.
- “Countering Youth Radicalization,” Preventing Youth Radicalization Conference, Ottawa Police Service, Ottawa, December 7, 2010.
- “Islamic Radicalization to 2025,” Special Operations Command Europe (SOCEUR), Component Commander’s Conference, Garmisch, Germany, November 16, 2010.

My research and scholarship in all three of these areas is consistent with best academic practices. I mainly rely on primary-source information, including statements and social media postings by extremist groups and their supporters, and internal documents intercepted by the United States or other governments. I cross-check all primary sources I read against other primary-source information, against information about events on the ground in relevant theaters, and against relevant secondary-source literature that allows me to determine whether my conclusions are consistent with those of other scholars and practitioners. I also check my analytic track record against unfolding events to determine if my anticipatory analysis is accurate, or if it requires some recalibration.⁶

In February 2017, the U.S. Attorney's Office in the Eastern District of Virginia asked me to review evidence gathered during the criminal investigation in the above-entitled case, *United States v. Nicholas Young*, including: digital media seized from the defendant's computer; various texts, documents, and items obtained from the defendant's belongings; records of Internet use by the defendant; photographs of the defendant seized from the defendant's computer; and weapons and combat gear possessed by the defendant. I was thereafter requested to produce a report based on my skills, training, knowledge and experience offering an expert assessment of the relationship, if any, between an individual's affinity for Nazism and neo-Nazism and such individual's inclination or willingness, if any, to support militant Islamist groups such as ISIS. I have concluded that there is a relationship between the two for three major reasons:

- The mechanisms of radicalization that can attract an individual to neo-Nazism and to militant Islam are highly similar.
- There are numerous salient case studies of convergence between Nazi or neo-Nazi ideology and militant Islamism in individuals that bear out the relationship between pro-Nazi beliefs and proclivity to support militant Islamists. This convergence also has historical precedents.
- When individuals have been attracted to or immersed in neo-Nazism, and then converted to Islam, they most frequently dive right into the extremist end of the diverse spectrum of Islamic practice, rather than showing interest in more moderate expressions of the faith.

This report fleshes out my conclusions in greater detail.

I. The Commonality Between Radicalization Mechanisms in Militant Islamism and Neo-Nazism

For decades, scholars of political and religious extremism have examined the reasons that some individuals who possess radical beliefs engage in terrorism and political violence to advance their cause. The academic literature has established several pathways that individuals follow from extremism to terrorist violence. Two major radicalization pathways are quite similar for militant Islamists and neo-Nazis. Some scholars emphasize the importance of *radical ideology*, or radical

⁶ For one framework on measuring forecasting, which I have adapted to measure my own work, see Philip E. Tetlock & Dan Gardner, *Superforecasting: The Art and Science of Prediction* (New York: Random House, 2015).

opinion, in driving people to illegally support militant groups.⁷ And some scholars emphasize the importance of *political grievance* in driving support for terrorism.⁸ As a corollary to these primary pathways, some scholarship focuses on the role of hate speech in facilitating the dehumanization of perceived enemies, which eliminates social and emotional barriers that would otherwise inhibit the use of violence. This is also an area where obvious commonalities exist between the approaches of adherents to both neo-Nazi and militant Islamist ideologies.

This section now reviews the academic literature concerning major pathways to violence, and establishes that ideological and political radicalization mechanisms are shared by neo-Nazism and militant Islamism.

Radical Ideology

Several studies have established radical ideology as an important vehicle driving extremist violence. In a 2008 article, Assaf Moghadam, a scholar who has authored several seminal studies on radicalization, explained the core functions of ideologies in building in-group cohesion, identifying “out-groups” as enemies, and driving people to action against perceived foes:

Ideologies have several core functions, of which the first is to raise awareness to a particular group of people that a certain issue deserves their attention. Ideologies explain to that “in-group” why social, political, or economic conditions are as they are. Since individuals often seek explanations in times of crisis, ideologies are particularly appealing when a group of people perceives itself to be in a predicament. The second function is a diagnostic one, whereby the ideology attributes blame for the present predicament of the in-group upon some “out-group.” The out-group is identified with a certain behavior that, according to the narrative offered by the ideology, undermines the well-being of the in-group. A third function of ideology lies in the creation of a group identity. At the same time that the out-group is blamed for the predicament of the in-group, the ideology identifies and highlights the common characteristics of those individuals who adhere to, or are potential adherents of, the ideology. The fourth and final function of ideologies is a programmatic one. It consists of the ideology offering a specific program of action said to remedy the in-group of its predicament and urges its adherents to implement that course of action.⁹

⁷ See, for example, Michael Jensen & Gary LaFree, *Final Report: Empirical Assessment of Domestic Radicalization (EADR)* (College Park, MD: University of Maryland, 2016); Daveed Gartenstein-Ross & Laura Grossman, *Homegrown Terrorists in the U.S. and U.K.: An Empirical Examination of the Radicalization Process* (Washington, DC: Foundation for Defense of Democracies, 2009); Assaf Moghadam, *The Globalization of Martyrdom: Al Qaeda, Salafi Jihad, and the Diffusion of Suicide Attacks* (Baltimore: The Johns Hopkins University Press, 2008); Mitchell D. Silber & Arvin Bhatt, *Radicalization in the West: The Homegrown Threat* (New York: New York City Police Department Intelligence Division, 2007); Quintan Wiktorowicz, *Radical Islam Rising: Muslim Extremism in the West* (Oxford: Rowman & Littlefield, 2005).

⁸ See, for example, Clark McCauley & Sophia Moskalenko, *Friction: How Radicalization Happens to Them and Us* (Oxford: Oxford University Press, 2011); Fathali Moghaddam, “The Staircase to Terrorism: A Psychological Explanation,” *American Psychologist* 60:2 (2005), pp. 161-69.

⁹ Assaf Moghadam, “The Salafi-Jihad as a Religious Ideology,” *CTC Sentinel* (West Point Combating Terrorism Center), February 15, 2008.

In the case of salafi jihadism, the ideology identifies the waning power of the Islamic faith as a political force, and the resulting humiliation of the *ummah* (worldwide body of believers) as a central malady of the age. As Moghadam notes, salafi jihadist ideology “identifies the alleged source of Islam’s conundrum in the persistent attacks and humiliation of Muslims on the part of an anti-Islamic alliance of what it terms ‘Crusaders,’ ‘Zionists’ and ‘apostates.’”¹⁰ It urges adherents to violent action—defining the concept of *jihad* in solely military terms—in response to this situation.

Moghadam also published an important book, *The Globalization of Martyrdom*, that extends this thesis at length.¹¹ Examining a wealth of data and cases, Moghadam concludes that explanations for extremism focusing on political grievances alone—in particular, the school of thought focusing on the causal force of foreign occupation by democratic countries, which is known as “occupation theory”—fail to fully explain contemporary suicide terrorism. He notes that suicide attacks “increasingly occur in countries where there is no discernible occupation.”¹² While suicide attacks employed in nationalist struggles (such as those of Sri Lanka’s LTTE or Palestinian militant groups) may occur in the context of occupation, Moghadam lists a number of countries that cannot reasonably be considered occupied that have seen significant suicide attacks, including Bangladesh, Indonesia, Jordan, Morocco, Saudi Arabia and Uzbekistan. Even where suicide attacks are carried out in response to occupations, they often do not target the occupier.

Suicide attacks in Iraq, Moghadam notes, “aimed instead at Shias, Kurds, and Sufis, in an apparent effort to stir ethnic tensions in the country and delegitimize the Iraqi government in the eyes of Iraqis.” Further, Moghadam notes that when suicide attacks target occupation forces, many of them “are not carried out by those individuals who, theoretically, should be most affected by the occupation.” Again using Iraq as his example, Moghadam concludes that most suicide attacks against occupation forces were carried out by foreign militants (such as Saudis, Syrians and Kuwaitis) rather than by Iraqis themselves.

Moghadam’s major conclusion is that the growing appeal of salafi jihadist ideology has produced a “globalization of suicide missions.”¹³ Based on such factors as conflict type, ideology, geographic scope of actors, targets, and goals, Moghadam distinguishes localized from globalized suicide attacks. The latter often occur in areas “not identified by all parties as zones of conflict,” are overwhelmingly associated with salafi jihadist groups, and are often connected to transnational militancy.¹⁴ Since the 9/11 attacks, Moghadam finds that suicide terrorist attacks by transnational salafi jihadist militant groups “have risen exponentially, far outnumbering the attacks conducted by the previously dominant groups.”¹⁵

Moghadam finds that ideology has an impact on suicide terrorism on the individual and organizational level. On the individual level, he notes that ideology “helps reduce the suicide attacker’s reservations about perpetrating the act of killing and dying. Specifically, ideology fills

¹⁰ Ibid.

¹¹ Assaf Moghadam, *The Globalization of Martyrdom: Al Qaeda, Salafi Jihad, and the Diffusion of Suicide Attacks* (Baltimore: The Johns Hopkins University Press, 2008).

¹² Ibid., p. 34.

¹³ Ibid., p. 2.

¹⁴ Ibid., p. 57.

¹⁵ Ibid., p. 251.

two roles: it helps the suicide bomber justify the act, and it helps the suicide attacker to morally disengage himself from his act and from the victim.”¹⁶ On the organizational level, most contemporary suicide campaigns “are designed to undermine the stability of a regime that the perpetrating groups deem illegitimate,”¹⁷ often because such governments are seen as un-Islamic.

Other studies have quantitatively established the significance of ideology. My own work on militant Islamist ideology and terrorism, which examined 117 homegrown terrorist cases in the U.S. and U.K. through 2008, found that externally measurable indicators of salafi jihadist ideology could be observed throughout the sample with enough frequency to suggest the salience of this ideology.¹⁸

In 2016, Michael Jensen and Gary LaFree of the START program at the University of Maryland published a study funded by the U.S. Department of Justice’s National Institute of Justice, entitled *Empirical Assessment of Domestic Radicalization*. After examining adherents to various extremist ideologies in the United States, Jensen and LaFree conclude that ideology “significantly related to behavior,” and that the embrace of a particular ideology is an intrinsic part of terrorists’ radicalization process.¹⁹ The findings of the study, which is based on a mixed-method approach to examining the largest known database of individual radicalization in the United States, support the idea that ideology—in particular, militant Islamist and far-right ideologies—drives mobilization to violence. The researchers explain:

Regardless of how we model the relationship between ideology and extremist behaviors, far right and Islamist ideologies appear to have a significant and positive relationship to violence. Despite being hard to assess using statistical methods, our results indicate that ideology may play a distinct, non-epiphenomenal role in the likelihood of violence. That is, the relationship between ideology and violence does not appear to be one that is completely driven by selection effects, whereby individuals with violent tendencies choose violent ideologies, and those without violent tendencies choose leftist ideologies. Rather, ideology appears to have an independent effect on shaping individual behaviors. These findings also suggest that ideological frameworks interact with other aspects of a radicalized individual’s life—namely peer-effects and personal stability indicators—to create pathways toward violence in the processes of radicalization.²⁰

Jensen and LaFree’s finding that ideology plays a non-epiphenomenal role in the likelihood of violence is not only consistent with the most persuasive academic work examining militant Islamism, but is also consistent with research into contemporary neo-Nazi movements. Martin A. Lee, whose book *The Beast Reawakens* provides an account of the resurgence of neo-Nazi and far right extremism, recounts the statement of white supremacist John King after he was sentenced to death. King and two friends were responsible for the notorious 1997 murder of James Byrd, a

¹⁶ Ibid., p. 255.

¹⁷ Ibid., p. 259.

¹⁸ Daveed Gartenstein-Ross & Laura Grossman, *Homegrown Terrorists in the U.S. and U.K.: An Empirical Assessment of the Radicalization Process* (Washington, DC: FDD Press, 2009).

¹⁹ Michael Jensen & Gary LaFree, *Final Report: Empirical Assessment of Domestic Radicalization (EADR)* (College Park, Md.: University of Maryland, 2016).

²⁰ Ibid., p. 41.

disabled black man whom they “chained to the back of a pickup truck in Jasper, Texas, and dragged by his ankles on a rough rural road for several miles until his head ripped off his body.”²¹ Lee describes King’s reaction to the sentence:

King showed no emotion when the death sentence was handed down. He responded in court by issuing a terse statement through his lawyer that ended with haughty words from American fascist ideologue Francis Parker Yockey, who committed suicide nearly four decades earlier: “The promise of success is with the man who is determined to die proudly when it is no longer possible to live proudly.”²²

Reflecting on King’s invocation of Yockey, Lee concludes that it “highlights the link between those who promote extremist ideology and the fanatical disciples who carry it out.”²³

Political Grievance

Political grievances are another pathway through which individuals may come to engage in extremist violence. Different kinds of political grievance that relevant scholarship has found to be important drivers of radicalization to violence include frustration with U.S. foreign policy, perceptions of discrimination, and socio-political marginalization. Personal grievances can interact with and reinforce group-level political grievances.

Social psychologists Clark McCauley and Sophia Moskalkenko provide one of the most comprehensive discussions of the political grievance pathway to radicalization in their 2011 book *Friction: How Radicalization Happens to Them and Us*.²⁴ McCauley and Moskalkenko outline twelve mechanisms of radicalization. Mechanisms that operate on an individual level include personal grievance based on harm inflicted on an individual or his loved ones; group grievance based on actual harm or threats toward a group or cause the individual cares about; a slippery slope, in which small involvements build upon each other, ultimately producing larger actions and commitments; love for someone already radicalized that can pull an individual toward radicalization; the risk and status that comes from involvement in an idealistic, and in many cases outlawed, cause; and *unfreezing*, where an individual who loses social connection can become open to new ideas and a new identity. Group mechanisms for radicalization that McCauley and Moskalkenko identify include group polarization, where like-minded individuals cause each other to adopt increasingly strident views; group competition, where groups become radicalized through a process of political competition with other like-minded groups; and group isolation, where group members are cut off from others, and come to see only the group itself as important, and everything external as unimportant or even evil.

In a peer-reviewed article published in 2015, “The Radicalization Puzzle,” Mohammed Hafez and Creighton Mullins synthesize several major academic works related to radicalization. They find

²¹ Martin A. Lee, *The Beast Reawakens: Fascism’s Resurgence from Hitler’s Spymasters to Today’s Neo-Nazi Groups and Right-Wing Extremists* Kindle ed. (New York: Routledge, 2000), loc. 149 of 12225.

²² Ibid.

²³ Ibid., loc. 159 of 12225.

²⁴ Clark McCauley and Sophia Moskalkenko, *Friction: How Radicalization Happens to Them and Us* (Oxford: Oxford University Press, 2011).

that, despite debates within the field of study, there is “some consensus on the key variables that produce radicalization and violent extremism.”²⁵ Hafez and Mullins highlight several kinds of grievance that have had salience in terrorism cases, including Western foreign policy and perceived discrimination. They observe that political grievances often interact with ideology, particularly in a group environment. In explaining how ideology functions in this context, Hafez and Mullins write:

Ideology can help forge a new rebellious identity by appealing to symbols, narratives, mythologies, and rituals that give meaning to acts of personal risk and sacrifice. These symbols and narratives give a sense of reenactment of the past where good triumphed over evil, framing victory as “inevitable.” It links isolated individuals with broader goals and identities, and may even link worldly time with sacred history. Ideology can thus turn mundane existence into a cosmic struggle between justice and inequity, and empowers individuals by suggesting that an alternative world is possible. Ideology can facilitate the reprioritization of values so that material benefits, career, family, or personal risk take a back seat to collective identity, transcendental values, and group solidarity. It is also necessary for demonizing or dehumanizing enemies and enabling moral beings to engage in otherwise immoral violence. In the case of religious extremists, ideology can frame personal sacrifice in this world as a steppingstone to eternal salvation and redemption. The rewards of afterlife far exceed any possible pleasures that can be derived in this world.²⁶

In synthesizing various pathways to violent action in service of extremist causes, Hafez and Mullins specifically finger Islamist militants’ use of online platforms as a significant facilitator. “Combined, radicals use these technologies to provide basic information on jihadi arenas and insurgent movements, and transmit political and religious narratives to motivate mobilization abroad or at home,” they write. “External networks distribute video clips, montages, hymns and poems, and even video games to publicize their deeds and promote the image of heroic warriors of God.”²⁷

Both militant Islamist and neo-Nazi movements feature ideological true believers, as well as those whose involvement in the movement is driven more by individual or group grievance. There are also other radicalization pathways, including radicalization driven by sense of adventure, and radicalization driven by mental illness, sometimes coupled with recruiters’ cynical exploitation of these individuals.²⁸ The next section turns to the role played by hate speech.

²⁵ Mohammed Hafez and Creighton Mullins, “The Radicalization Puzzle: A Theoretical Synthesis of Empirical Approaches to Homegrown Extremism,” *Studies in Conflict & Terrorism* 38 (2015), p. 959. McCauley and Moskalenko would later identify Hafez and Mullins’s study as one of the key “milestones” in radicalization research based on its “contribution to psychological theorizing of radicalization and salience to U.S. security officials.” Clark McCauley & Sophia Moskalenko, “Understanding Political Radicalization: The Two-Pyramids Model,” *American Psychologist* 72:3 (2017), p. 205, 210.

²⁶ Hafez and Mullins, “The Radicalization Puzzle,” p. 967.

²⁷ *Ibid.*, p. 969.

²⁸ Mental illness is rare as a driver of terrorism in the group context, as terrorists tend to suffer from mental illness at a lesser frequency than the population as a whole. See Marc Sageman, *Leaderless Jihad: Terror Networks in the Twenty-First Century* (Philadelphia: University of Pennsylvania Press, 2008). However, for “lone wolf” terrorists, as

The Particular Role of Hate Speech

Hateful messages are a staple of extremist ideologies. Hate speech magnifies extremist grievances and helps mobilize the audience to violence. Hateful messaging serves as a tool through which organizations indoctrinate potential recruits and facilitate their adoption of a radical worldview. In 2016, the Secretary General of the Council of Europe, Thorbjørn Jagland, remarked that “young people are often made more vulnerable and open to (terrorist recruitment) offers after having encountered hate speech on the Internet.”²⁹ Hateful rhetoric helps break down psychological barriers to violence, while repeated exposure to and engagement in hateful rhetoric accelerates the process of dehumanizing one’s foes, and thus morally disengaging from physical harm inflicted upon them.

Experts generally agree that individuals derive a certain level of self-concept based on group membership. Our understanding of and identification with our respective social group provides us with a set of norms and behaviors to adhere to, as well as a sense of pride and self-esteem.³⁰ By positively differentiating our in-group from another out-group, we can bolster our individual sense of positive distinctiveness. But there are pitfalls inherent in this kind of social categorization. One set of dangers relates to discrimination based on group identity. Further, as individuals become increasingly invested in belonging to a group, the salience of their collective identity can surpass that of their individual identities.³¹ Over time, the cognitive prioritization of the group over the self can depress an individual’s “psychological threshold” for carrying out acts of violence, especially in pursuit of ideological goals that are viewed as paramount.³² If the group portrays violent or alienating behavior as compulsory and vindicated, then the individual is more likely to adopt this mentality and engage in such acts.³³

Hateful rhetoric strengthens the salience of collective identity, and can condition individuals to perceive an out-group and its members in a highly pejorative manner. Such messaging exaggerates the differences between in-group members and out-group members. Hateful messages targeting an out-group often feature accusations and alarming statements depicting the out-group as an existential threat to the in-group. Such assertions heighten in-group members’ “lack of empathy and increased animus to out-groups.”³⁴ The contempt that hate speech breeds further fuels

opposed to those affiliated with groups, anecdotal evidence suggests that they may suffer from mental illness at a higher rate than the general population. See Ramón Spaaij, *Understanding Lone Wolf Terrorism: Global Patterns, Motivations and Prevention* (Springer, 2012).

²⁹ Thorbjørn Jagland, “Terror and Radicalization: The Council of Europe’s Response,” *Horizons* (Spring 2015).

³⁰ Fathali Moghaddam, *Multiculturalism and Intergroup Relations: Psychological Implications for Democracy in Global Context* (Washington, D.C.: American Psychological Association, 2008), p. 95; Joshua David Wright, “A Social Identity and Social Power Perspective on Terrorism,” *Journal of Terrorism Research* 6:3 (2015), pp. 76–83.

³¹ See Kira Harris, Eyal Gringart & Dierdre Drake, “Understanding the Role of Social Groups in Radicalisation,” Proceedings of the 7th Australian Security and Intelligence Conference, Edith Cowan University, Perth, December 1-3, 2014 (summarizing theories of deindividuation).

³² Jensen & LaFree, *Empirical Assessment of Domestic Radicalization*, pp. 19-20 (summarizing research and synthesizing it with their empirical findings).

³³ Harris et al., “Understanding the Role of Social Groups in Radicalisation.” Harris and her colleagues review the relevant literature, and note that “if the group presents violent or alienating action as required and justified, then the individual will embrace this view.”

³⁴ Harris et al., “Understanding the Role of Social Groups in Radicalisation.”

cognitive distancing between the individual and members of the out-group: Out-group members are viewed not only as different and inferior, but as loathsome.³⁵

Hate speech can also function as a mechanism for *dehumanization*, which social psychologists and historians have found to be connected to violence. Alexandra B. Roginsky and Alexander Tsesis note that “hate speakers rely on dehumanizing images to justify exclusion, discrimination, and, in genocidal cases, elimination of identifiable groups. Dehumanization can be both an attack on the target’s dignity and a justification for harmful actions. Statements dehumanizing hated groups often influence the commission of discriminatory conduct.”³⁶ They note the role of hateful rhetoric in motivating the slaughter of Jews in Nazi Germany, Armenians in Turkey, Darfuris in Sudan, and Tutsis in Rwanda.³⁷ Put simply, exposure to the dehumanizing rhetoric and beliefs that characterize hate speech can deteriorate psychological impediments to violence by encouraging emotional and cognitive detachment between the actor and the target.³⁸ “To perceive another as human activates empathetic reactions through perceived similarity,” writes Stanford University psychologist Albert Bandura. “Once dehumanised, they are no longer viewed as persons with feelings, hopes and concerns but as sub-human objects.”³⁹

Adam Lankford, a criminology professor at the University of Alabama, explains in his book *Human Killing Machines* that “if your enemies are not regarded in human terms, it is much easier to exterminate them.”⁴⁰ Militant Islamist groups like al-Qaeda and ISIS, for example, define victims as vermin, describing the West as a “world of contaminants,” and characterizing Westerners and Jews as “lowly animals.”⁴¹ We can discern this tendency to dehumanize the enemy in the statements of ISIS terrorists and leaders. As just one of many examples, on December 19, 2016, Anis Amri ploughed a truck into a Christmas market in Berlin, killing 12 people. Prior to the attack, Amri recorded a video claiming credit on ISIS’s behalf. He called on Muslims in Europe to “kill the crusader pigs,” a dehumanizing description of the group’s enemies.⁴² Amri’s statement was utterly typical of ISIS’s rhetoric, and examples of militant Islamists and neo-Nazis using dehumanizing language to describe their enemies are numerous.

Dehumanization is only one aspect of the psychological disengagement process that can mobilize militants. In “Mechanisms of Moral Disengagement in Terrorism,” Albert Bandura explains that the transformation of ordinary, well-adjusted individuals into killers is “accomplished by cognitively restructuring the moral value of killing, so that it can be done free from self-censuring

³⁵ Robert Sternberg, “A Duplex Theory of Hate: Development and Application to Terrorism, Massacres, and Genocide,” *Review of General Psychology* 7 (2003).

³⁶ Alexandra B. Roginsky and Alexander Tsesis, “Hate Speech, Volition, and Neurology,” *Journal of Law and the Biosciences* 3:1 (2016), pp. 174–77.

³⁷ *Ibid.*

³⁸ Sternberg, “A Duplex Theory of Hate.”

³⁹ Albert Bandura, “Selective Moral Disengagement in the Exercise of Moral Agency,” *Journal of Moral Education* 31:2 (2002), pp. 108–09.

⁴⁰ Adam Lankford, *Human Killing Machines: Systematic Indoctrination in Iran, Nazi Germany, al Qaeda, and Abu Ghraib* (Lanham: MD, Lexington Books, 2010), p. 80.

⁴¹ *Ibid.*

⁴² Adam Withnall, “Berlin Attack Suspect Anis Amri ‘Recorded Video Pledging Allegiance to Isis,’” *The Independent* (U.K.), December 23, 2016.

restraints.”⁴³ In this way, hate speech and extremist ideology often mutually reinforce one another. In other words, beyond demonizing and degrading the enemy, hateful rhetoric can advance an extremist ideology, articulating the grievances of the group and facilitating a process of moral restructuring. The persuasiveness of hateful messages becomes significantly stronger when paired with “religious principles, righteous ideologies, and nationalistic imperatives.”⁴⁴ In this way, hateful rhetoric and extremist ideologies can create a cyclical process wherein ideology prescribes a certain moral framework while hate speech allows individuals to tune out voices opposed to their growing extremism, and lower their moral disinclination to carry out or materially support extremist violence. Hate speech can reinforce an ideology, which in turn proliferates the use of hate speech.

This report has thus outlined how militant Islamism and neo-Nazism have common mechanisms of radicalization. It now examines various individuals who represent the convergence between Nazism and Islamist militancy in practice.

II. The Convergence: Nazism and Islamist Militancy

It may seem counterintuitive or surprising that there would be areas of convergence between Nazism and Islamist militancy, or that both ideologies might appeal to the same person. After all, a committed Nazi would view many Muslims as racially suspect, while Islamist militants tend to view “infidels” as a whole as their adversaries. But there have been areas of convergence between Nazi and Islamist militant movements, and there are several cases where terrorists or extremists embraced both ideologies simultaneously, or moved fluidly from one to the other. Despite their points of difference, there are ideological similarities between both movements, and they share an overlapping set of enemies.

Turning to the similarities between Nazism and Islamist militancy, they both offer adherents similar cognitive frameworks. Both Nazism and Islamist militancy are totalitarian movements that propose rigid, far-reaching, and all-consuming outlooks that divide the world unambiguously into “good” and “evil.”⁴⁵ These ideologies obviate the need for nuance in one’s decision-making processes, instead offering a clear set of black-and-white principles for interpreting the world. A second similarity is that Nazism and militant Islamism share overlapping sets of enemies: the Jewish people, and the West more broadly. (Even when neo-Nazi movements purport to represent or defend Western values, in practice they reject the current political system in its totality.) Both movements categorize Judaism as evil, and have a paranoid fixation on the idea of a global Zionist conspiracy. Indeed, a shared enmity toward the Jews lies at the center of literally every we have seen of Nazi-jihadist affinity. For some individuals who have embraced both Nazism and militant Islamism, the two movements’ contempt for Jews is of utmost importance, and allows them to overlook incongruent aspects of Nazi and jihadist ideology.

⁴³ Albert Bandura, “Mechanisms of Moral Disengagement,” in Walter Reich ed., *Origins of Terrorism: Psychologies, Ideologies, Theologies, States of Mind* (Cambridge, UK: Cambridge University Press, 1990).

⁴⁴ *Ibid.*

⁴⁵ David Patterson, “Islamic Jihadism and the Legacy of Nazi Antisemitism,” *Journal of Antisemitism* vol. 7 (2016), p. 189.

This section first outlines the ideological principles of both movements. It then explores case studies of individuals who have become adherents of, or sympathetic toward, both militant Islam and Nazism. Following these case studies, the section briefly explores the historical convergence between Nazism and movements or governments rooted some way in Islamic values. Finally, the section examines the pervasive influence that anti-Semitism has had on both movements.

Defining Nazism and Jihadism

National Socialism, more commonly known as Nazism, is a fascist, authoritarian ideology defined by hyper-nationalism and extreme xenophobic and ethnocentric views. The ideological tenets of Nazism are best articulated in two documents: the dictator Adolf Hitler's autobiography *Mein Kampf* and the Nazi Party's twenty-five point program, which Hitler first articulated in a public speech in February 1920.⁴⁶ Outside of these two documents, there is a dearth of officially-sanctioned material that conveys the principles of the movement. For instance, although Alfred Rosenberg's *The Myth of the Twentieth Century*, an anti-Semitic interpretation of modern history, received wide acclaim in Nazi Germany, and is widely considered the most influential articulation of Nazi principles after *Mein Kampf*, Hitler stated privately that the book was "not to be regarded as an expression of the official doctrine of the party."⁴⁷ Nonetheless, Nazism's core doctrines have been expressed in Nazi party documents, letters, decrees, Hitler's speeches and writings, and most significantly in the actions of Nazi-ruled Germany, which was also known as the Third Reich.

Nazism calls for a totalitarian model of governance, characterized by single party rule, a head of state with absolute power, and government control of the economy and press. But the most prominent and distinctive characteristic of Nazi ideology is its view on race and ethnicity. Nazism proposes a hierarchical racial order in which Germanic and Nordic peoples, known as "Aryans" by Nazi racial designations, are considered the most advanced and culturally refined—in other words, the "master race."⁴⁸ Nazism seeks to preserve the purity of the Aryan race, and views race mixing as a primary cause of cultural and political decline.⁴⁹

The Nazis' fears of ethnic and racial impurity led Hitler and others to propose a militaristic form of social Darwinism that called for Germany to remove "inferior races" in order to create a stable and pure German nation.⁵⁰ This model of ethnic cleansing was focused most virulently on Germany's Jewish population, whom Hitler viewed as parasitic and destructive, and as the greatest source of corruption in German society.⁵¹ Nazi Germany's efforts to achieve cultural homogeneity included the Nuremberg Laws, which imposed severe legal restrictions on Germany's Jewish population, and later the Final Solution, a plan to exterminate the Jewish people. The Nazi Party was also motivated by the principle of *Lebensraum*, a German word denoting living space. The

⁴⁶ William L. Shirer, *The Rise and Fall of the Third Reich* Kindle ed. (New York: RosettaBooks, 2011 ed.), loc. 1024 of 29529.

⁴⁷ Hugh Trevor-Roper, *Hitler's Table Talk* (New York: Enigma Books, 2000), p. 400.

⁴⁸ George Lachmann Mosse, *Nazi Culture: Intellectual, Cultural, and Social Life in the Third Reich* (Madison, WI: University of Wisconsin Press, 1966), pp. 79-81.

⁴⁹ Richard Evans, *The Coming of the Third Reich* (London: Penguin, 2005), p. 10.

⁵⁰ Hajo Holborn, "Origins and Political Character of Nazi Ideology," *Political Science Quarterly* 79:4 (1964), p. 546.

⁵¹ Ian Kershaw, *Hitler: A Biography* (London: W.W. Norton & Company, 2008), p. 148.

Nazis claimed that the German state would need to expand territorially, through military means, to provide sufficient resources for the Aryan peoples.⁵²

The damage done by the Hitler's Nazi regime is staggering. Fifty to 60 million people died in the Second World War, which Nazi Germany instigated. True to its anti-Semitic ideology, the Third Reich engaged in a systematic slaughter of Jewish people, killing around six million Jews. According to the United States Holocaust Memorial Museum, Nazi Germany also engaged in the mass slaughter of numerous other groups:

Soviet civilians: around 7 million (including 1.3 Soviet Jewish civilians, who are included in the 6 million figure for Jews)

Soviet prisoners of war: around 3 million (including about 50,000 Jewish soldiers)

Non-Jewish Polish civilians: around 18 million (including between 50,000 and 100,000 members of the Polish elites)

Serb civilians (on the territory of Croatia, Bosnia and Herzegovina): 312,000

People with disabilities living in institutions: up to 250,000

Roma (Gypsies): 196,000 – 220,000

Jehovah's Witnesses: around 1,900

Repeat criminal offenders and so-called asocials: at least 70,000 ...

Homosexuals: hundreds, possibly thousands⁵³

Though Nazi Germany met with decisive defeat at the end of World War II, its ideals are kept alive by the contemporary neo-Nazi movement. Violence, anti-Semitism, and racialism remain at the core of the neo-Nazi movement's worldview. There are few differences between the ideology of contemporary neo-Nazi groups and that of the National Socialist Party that rose to power in Germany in the 1930s. Indeed, the neo-Nazi movement draws freely from Hitler's ideas and ideals.

Militant Islamism is frequently referred to by its adherents as salafi jihadism, or *salafiyya jihadiyya*. Salafi jihadism is a violent outgrowth of the salafi movement. Salafists can be defined broadly as individuals who embrace an austere religious methodology striving for a practice of Islam that they believe to be consonant with that of the Prophet Muhammad and the first three generations of Muslims. This focus on the first three generations is derived from a *hadith*, or saying of the Prophet Muhammad, who was asked about the characteristics of the best Muslims. He said

⁵² Ibid.

⁵³ United States Holocaust Memorial Museum, "Documenting Numbers of Victims of the Holocaust and Nazi Persecution" (n.d.).

that they were “of the generation to which I belong, then of the second generation, then of the third generation.”⁵⁴

The scholar Monica Marks identifies three major divisions of salafism: *salafiyya ‘almiyya* (usually translated as scientific salafism), political salafism, and salafi jihadism.⁵⁵ She explains that for those who can be categorized as salafiyya ‘almiyya, democracy is “a tempting, but ultimately dead-end street.” Thus, people belonging to this current focus on “apolitical lives of quietist piety.” Adherents to the second category, political salafism, have much in common with those who identify as salafiyya ‘almiyya, but believe that participation in democratic politics is justified despite its flaws because it “could serve as a vehicle to attain a more caliphate-like, shariah-based polity.” The third division, salafi jihadism, rejects both participation in democracy and also “the non-engagement of scripturalist Salafis.”⁵⁶ Instead, this strain of salafism sanctions violence. Quintan Wiktorowicz notes that salafi jihadists “take a more militant position” than other salafi strains, arguing “that the current context calls for violence and revolution.”⁵⁷ Similarly, Stefano Torelli, Fabio Merone and Francesco Cavatorta define salafi jihadism as “a form of violent opposition to ‘unjust rule,’ aimed at establishing an Islamic state.”⁵⁸

Salafi jihadists define “unjust rule” broadly. While the movement bases its justification for violence in part on political grievances, which have been outlined in numerous jihadist documents,⁵⁹ the movement’s political grievances should not obscure the longer-term political objectives driving its use of violence. One objective is to spread *sharia*, or Islamic law. As al-Qaeda’s co-founder and longtime emir Osama bin Laden said in a 1998 letter published in the Rawalpindi-based newspaper *Jang*, al-Qaeda believes that its war should continue until “the Islamic sharia is enforced on the land of God.”⁶⁰ Jihadist leaders have repeatedly emphasized the importance of establishing sharia since then, and whenever they have succeeded in seizing territory, they have implemented a hardline version of sharia. A strict version of sharia was implemented, for example, in Taliban-ruled Afghanistan from the mid-1990s through 2001; in Iraq’s Anbar province under al-Qaeda in Iraq, and later in Iraq and Syria under ISIS; in Somalia under al-Shabaab; in Yemen under al-Qaeda in the Arabian Peninsula (AQAP); in northern Mali under al-Qaeda in the Islamic Maghreb (AQIM); and in Libya when ISIS conquered the coastal city of Sirte.

The implementation of a hardline version of sharia in these areas has been catastrophic for vulnerable populations. The Taliban’s treatment of women was so inhumane that Physicians for Human Rights noted in 1998 that “no other regime in the world has methodically and violently forced half of its population into virtual house arrest, prohibiting them on pain of physical punishment from showing their faces, seeking medical care without a male escort, or attending

⁵⁴ *Sahih Muslim* book 31, no. 6159.

⁵⁵ Monica Marks, “Youth Politics and Tunisian Salafism: Understanding the Jihadi Current,” *Mediterranean Politics* 18:1 (2013).

⁵⁶ *Ibid.*, p. 109.

⁵⁷ Quintan Wiktorowicz, “Anatomy of the Salafi Movement,” *Studies in Conflict & Terrorism* 29 (2006), p. 208.

⁵⁸ Stefano M. Torelli, Fabio Merone and Francesco Cavatorta, “Salafism in Tunisia: Challenges and Opportunities for Democratization,” *Middle East Policy* 19:4 (2012), p. 145.

⁵⁹ See, for example, Osama bin Laden, “Declaration of Jihad against the Americans Occupying the Land of the Two Holy Mosques,” trans. Open Source Center, August 23, 1996.

⁶⁰ “Bin Laden: Expel Jews, Christians from Holy Places,” *Jang* (Rawalpindi), trans. Open Source Center, November 18, 1998.

school.”⁶¹ Homosexuals were executed. Virtually every imaginable form of light entertainment was banned, including kite flying, movies, television, music, and dancing. Also banned were paintings and the celebration of holidays that were cultural rather than religious, such as the Afghan new year.⁶² Afghans were beaten and sometimes killed for flouting the Taliban’s complex and often absurd set of rules. And ISIS’s rule was even more extreme and brutal. In areas where it was militarily powerful, ISIS implemented outright genocidal policies toward religious minorities, including Yazidis and Christians, including engaging in mass slaughter of civilians. ISIS had so thoroughly dehumanized the Yazidis that its official English-language publication, *Dabiq*, even boasted at length that it was now enslaving Yazidis, and forcing Yazidi women to become concubines.⁶³ (The group argued at length that the institution of forced concubinage was justified theologically.) ISIS’s implementation of sex slavery was widespread and devastating, both physically and psychologically, for its victims.

Another goal of the salafi jihadist movement is reestablishment of the caliphate, a theocratic government that would rule a united Muslim world. Islam’s first caliph (Arabic for *successor*, denoting that the caliph follows Muhammad as the faith’s political leader) was Abu Bakr, who led the *umma* beginning in 632 AD, after the Prophet Muhammad’s death. One jihadist thinker, in a representative statement, described Mustafa Kemal Atatürk’s 1924 abolition of the caliphate as the “mother of all crimes.”⁶⁴ Al-Qaeda leaders, including bin Laden, made multiple references to the need to reestablish the caliphate. ISIS claimed in a June 2014 announcement that it had accomplished this goal. Yet the caliphate’s alleged establishment did not end ISIS’s war against the infidels, nor would it do so for al-Qaeda.

One work that shows how jihadists envision their fighting continuing even after the caliphate has been restored is Jordanian journalist Fouad Hussein’s influential 2005 book *Al-Zarqawi: The Second Generation of al-Qaeda*, which Pulitzer Prize-winning author Lawrence Wright has called “perhaps the most definitive outline of al-Qaeda’s master plan.”⁶⁵ Hussein shows that in this master plan, al-Qaeda’s strategists foresaw a “stage of all-out confrontation” with the forces of atheism after the caliphate is established. Hussein writes, “Al-Qaeda ideologues believe that the all-out confrontation with the forces of falsehood will take a few years at most. The enormous potential of the Islamic state—particularly because the Muslim population will amount to more than 1.5 billion—will terrify the enemy and prompt them to retreat rapidly.”⁶⁶ Consistent with this vision of the caliphate’s establishment as one further step to all-out confrontation with the non-Muslim world, ISIS continued to try to conquer land contiguous to the territory it controlled, and to carry out brutal terrorist attacks throughout the world, even after it declared a caliphate.

⁶¹ Physicians for Human Rights, *The Taliban’s War on Women: A Health and Human Rights Crisis in Afghanistan* (Boston: Physicians for Human Rights, 1998).

⁶² Ahmed Rashid, *Taliban* (New Haven: Yale Nota Bene, 2001), p. 107, 115.

⁶³ “The Revival of Slavery Before the Hour,” *Dabiq* issue 4, October 2014, pp. 14-17.

⁶⁴ Asim Umayra, “The Destruction of the Khilafah: The Mother of All Crimes,” talk given at Najah University, Nablus, West Bank, April 15, 2000, quoted in Mary Habeck, *Knowing the Enemy: Jihadist Ideology and the War on Terror* (New Haven, CT: Yale University Press, 2006), p. 8.

⁶⁵ Lawrence Wright, “The Master Plan,” *New Yorker*, September 11, 2006.

⁶⁶ Fouad Hussein, *Al-Zarqawi: The Second Generation of al-Qaeda*, part 15, serialized in *Al-Quds Al-Arabi* (London), May 30, 2005, trans. Open Source Center.

Individual Case Studies of the Nazi-Militant Islamist Convergence

Ideological synergy between neo-Nazism and militant Islamism has resulted in some people either embracing both ideologies simultaneously or else transitioning smoothly from one movement to the other. Scholar Lorenzo Vidino of George Washington University notes that neo-Nazis and their fellow travelers are “fascinated with fundamentalist Islam’s opposition to capitalism, its martial discipline, and its profound hatred of Jews.”⁶⁷ Vidino writes:

Several members of European fascist and Nazi organizations expressed their support for the 9/11 attacks, and there have been reports of contact between their groups and radical Islamic organizations. Though their numbers are still small, some of these extremists have converted to Islam and embrace the religion’s most vicious interpretation.⁶⁸

This observation—that members of Nazi organizations who convert to Islam almost uniformly embrace the most extreme version of that faith—is consistent with my own research into the phenomenon. This section examines several individuals that illustrate the Nazi-militant Islamist connection, including David Myatt, Steven Smyrek, Emerson Begolly, Ahmed Huber, Sascha Lemanski, Devon Arthurs, Thomas Usztics and Diego José Frías Álvarez.

David Myatt. One the most famous examples of this type of convergence is David Myatt, a founder of the British National Socialist Movement. Myatt converted to Islam in 1998.

According to George Michael, an American academic who has done seminal research on the relationship between neo-Nazism and militant Islamism, Myatt “has arguably done more than any other theorist to develop a synthesis of the extreme right and Islam.”⁶⁹ Prior to converting to Islam, Myatt authored a handbook entitled *A Practical Guide to Aryan Revolution*, and served as the ideological leader of the ultra-violent British neo-Nazi gang Combat 18.⁷⁰ In an online article entitled *From Neo-Nazi to Muslim*, Myatt acknowledges the apparent irony of his conversion, and the tension that existed between his former and then-current ideology. He wrote: “These were the people who I had been fighting on the streets, I had sworn [sic] at and had used violence against—indeed, one of my terms of imprisonment was a result of me leading a gang of skinheads in a fight against ‘Pakis’.”⁷¹ But Myatt eventually lost hope in the far right’s ability to combat Zionism and the West. He explained: “There will not be an uprising, a revolution, in any Western nation, by nationalists, racial nationalists, or National Socialists—because these people lack the desire, the motivation, the ethos, to do this and because they do not have the support of even a large minority of their own folk.”⁷²

⁶⁷ Lorenzo Vidino, *Al-Qaeda in Europe: The New Battleground of International Jihad* (Amherst, NY: Prometheus Books, 2006), p. 32.

⁶⁸ *Ibid.*

⁶⁹ George Michael, *The Enemy of My Enemy: The Alarming Convergence of Militant Islam and the Extreme Right* (Lawrence, KS: University of Kansas, 2006), p. 142.

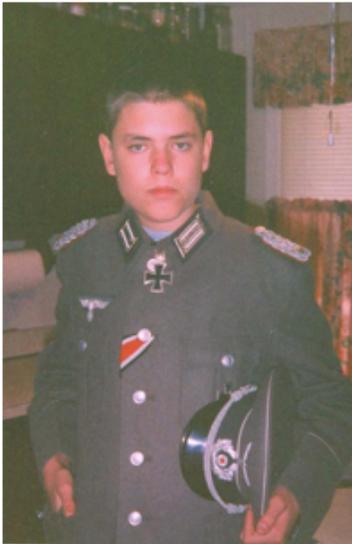
⁷⁰ Nicola Woolcock & Dominic Kennedy, “What the Neo-Nazi Fanatic Did Next: Switched to Islam,” *The Times* (U.K.), April 24, 2006.

⁷¹ Quoted in *ibid.*

⁷² *Ibid.*

This disillusion helped prompt Myatt to turn to Islam, after which he assumed the name Abdul Aziz ibn Myatt. Myatt exhorted “all enemies of the Zionists to embrace the Jihad,” referred to Islam as the “true martial religion,” and claimed that it “will most effectively fight against the Jews and the Americans.”⁷³ He praised al-Qaeda leader Osama bin Laden, describing bin Laden as “an exemplary warrior who has forsaken a life of luxury to pursue his Islamic duty.”⁷⁴ In an essay entitled “In Reply to Sheikh Salman b. Fahd al-Oadah,” Myatt rebuffed a leading Saudi cleric who had criticized al-Qaeda and Osama bin Laden for sanctioning the killing of innocents. In his response, Myatt argued that bin Laden seeks “only to do what is right and just according to the criteria of Quran and Sunnah,” and therefore that those who criticize him “betray” him to the “*kuffar*,” a derogatory term for non-believers.⁷⁵

Essentially, Myatt’s hatred for Jews and enmity toward the “so-called New World Order” superseded the discordant elements of militant Islamist and Nazi ideology. “According to Myatt,” George Michael writes, “the primary battle against the Zionist occupation government (ZOG) has shifted from the West to the Islamic world... This war between Islam and the new world order, in Myatt’s estimation, makes the extreme right’s goals more easily obtainable.”⁷⁶ Consequently, in an interview with Michael in April 2003, Myatt deemed an alliance between militant Islamists and National Socialists to be not only “possible” but “indeed necessary.”⁷⁷



A teenage Emerson Begolly dressed as a Nazi.

Though Myatt eventually came to reject both Islam and extremism, his case provides an example of how one’s commitment to anti-Semitism can bridge the ideological divide between Nazism and jihadism.

Emerson Begolly is a Nazi sympathizer turned jihadist who originally hails from Pennsylvania. He had been involved in neo-Nazism at a young age, as Begolly’s father introduced him to Nazi beliefs, and dressed him as a Nazi.⁷⁸ Begolly posted photos on his MySpace page depicting him dressed as a Nazi while he was a teenager.

Begolly later converted to Islam, and became an active member of several jihadist forums. Displaying continuity with his early immersion in Nazi ideas and identity, he established a reputation for particularly harsh anti-Semitic posts.⁷⁹ For example, in one post on a jihadist forum in which he references Hitler’s Final Solution, Begolly wrote: “The only the good about that all the jews weren’t

⁷³ Discussed in Ely Karmon, “The Middle East, Iraq, Palestine—Arenas for Radical and Anti-Globalization Groups Activity,” paper presented at NATO Workshop on Terrorism and Communications – Countering the Terrorist Information Cycle, April 2005, available at <https://www.ict.org.il/Article.aspx?ID=929>.

⁷⁴ Michael, *The Enemy of My Enemy*, p. 147.

⁷⁵ David Myatt, “In Reply to Sheikh Salman b. Fahd al-Oadah,” blog entry posted in September 2007, available at <http://archive.is/Ornn#selection-1257.0-1799.16>.

⁷⁶ Michael, *The Enemy of My Enemy*, pp. 146-47.

⁷⁷ Ibid.

⁷⁸ Hanna Siegel, “Nazi Buff Turned Jihadi Allegedly Bites FBI Agents,” ABC News, January 6, 2011.

⁷⁹ SITE Intelligence Group, “Emerson Begolly: An American Jihadist,” December 22, 2010.

gassed that that insha'Allah someday we will get a chance to kill jews ourselves.”⁸⁰ (Grammar in original.) Begolly was also known for collecting, distributing, and producing his own nasheeds—Islamic works of acapella music. Islamist militants have particularly taken to producing nasheeds because they believe musical instruments are religiously proscribed, thus making the a capella nasheeds one of the few permissible forms of music. Begolly composed an original nasheed entitled “When the Jew’s Blood Reds My Knife, Then My Life is Free from Strife”:

*When the Jew’s blood reds my knife, Then my life is free from strife.
Hiding behind rocks and trees, I’ll find them with greatest ease.
Make them get down on their knees, Slaughter them despite their pleas.
Throw them in the ovens hot, Soap and lampshades sold and bought.
Made of the Jews that we shot, Mercy’s something I have not.
With the bomb and machine gun, Blast at them and watch them run.
We will have a lot of fun, Shoot and kill Jews one by one.
Rise up, O Salahuddin, Great and brave Mujahideen.
Like the Sheikh Ahmed Yassin, For the Love of Filisteen.
At al-Aqsa we shall meet, After Israel’s defeat.
Their dead bodies at our feet, Taste of victory is sweet.
Jerusalem is calling me, Asadullah Alshishani.
Jihad’s where you’re meant to be, Come and set the captives free.*⁸¹

Begolly began exhorting others to participate in violent attacks in the United States. Information presented in Begolly’s prosecution showed that he was “an active administrator” of a jihadist forum known as Ansar al Mujahideen English Forum.⁸² Writing under the name Abu Nancy, Begolly “systematically solicited jihadists to use firearms, explosives, and propane tanks against targets such as police stations, post offices, Jewish schools and daycare centers, military facilities, train lines, bridges, cell phone towers, and water plants.”⁸³ On December 18, 2010, Begolly uploaded a guide with instructions on how to manufacture explosives.⁸⁴ He was sentenced to 102 months in prison after pleading guilty to soliciting crimes of violence.

One piece of evidence provided to me by the U.S. Attorney’s Office in the Eastern District of Virginia suggests that the defendant was interested in the Begolly case. A post that seemingly appeared on the defendant’s Facebook page recommends a news video produced by WTAE Channel 4 Pittsburgh where reporters profile Begolly, and discuss his extremist beliefs and pro-terrorism activities.⁸⁵

⁸⁰ Ibid.

⁸¹ Lorenzo Vidino et al., *Terrorist Chatter: Understanding What Terrorists Talk About* (Ottawa: Carleton University, 2015), p. 63. In this passage, he references *Ahmed Yassin*, founder of the Islamist terrorist group Hamas. *Filisteen* is the Arabic word for *Palestine*. Begolly’s reference to *Asadullah Alshishani* indicates the name he adopted following his conversion to Islam.

⁸² U.S. Department of Justice, press release, “Pennsylvania Man Sentenced for Terrorism Solicitation and Firearms Offense,” July 16, 2013, <https://archives.fbi.gov/archives/pittsburgh/press-releases/2013/pennsylvania-man-sentenced-for-terrorism-solicitation-and-firearms-offense>.

⁸³ Ibid.

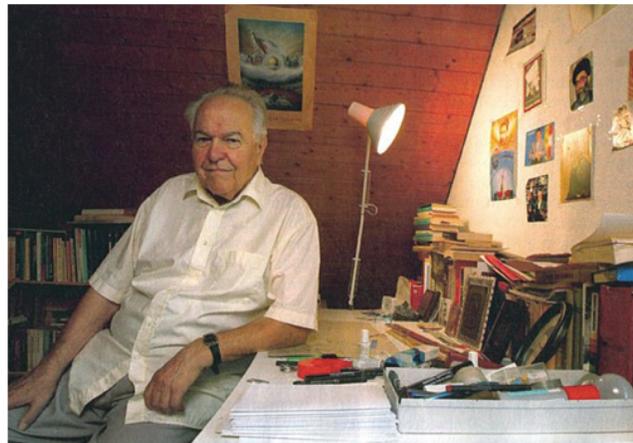
⁸⁴ Ibid.

⁸⁵ Evidentiary documents GX 8-108, 8-109.

Steven Smyrek. Another case of Nazi-militant Islamist convergence is Steven Smyrek, a former German neo-Nazi. While most cases of convergence discussed in this section involve individuals who gravitated toward Sunni militancy, Smyrek was arrested in Israel in 1997 for planning to carry out a suicide attack on behalf of Hizballah, a Shia militant group.⁸⁶ Smyrek had converted to Islam prior to travelling to Tel Aviv. Though he was sentenced to ten years in prison, Israeli security services released Smyrek as part of a prisoner exchange agreement in 2004 after he signed a document “renouncing violence.”⁸⁷

But once he returned to Europe, Smyrek was unrepentant. “It’s an honor to die for Islam and for Allah,” he told a filmmaker in an interview for a documentary. “When the order comes you have to carry it out and there’s not time to ask if there is a God or not, or to think what will happen after you’re dead, without feeling you simply have to lay down your life as Allah decreed.”⁸⁸

The late *Ahmed Huber*, born Albert Friedrich Armand Huber in 1927, is another individual who, driven primarily by anti-Semitism, found common ground between neo-Nazi and extreme Islamist beliefs. Huber was a Swiss journalist and influential leader in Europe’s far-right circles who, in his late thirties, had converted to Islam.⁸⁹



Ahmed Huber

Huber actually converted to Islam *prior to* embracing more extreme right-wing beliefs. Nonetheless, according to George Michael, “[n]ot unlike David Myatt, Huber found no contradiction in terms of his Islamic faith and his admiration for German National Socialism.”⁹⁰ Huber was virulently anti-

Semitic and anti-American, and his prioritization of these hatreds allowed him to move seamlessly between militant Islam and neo-Nazism. Like Myatt, Huber actively sought to nurture relations between Muslim extremism and the far right, arguing that they could unite against a common foe: Jews and Zionism.⁹¹

Huber’s first real exposure to Islam came in 1959, when he was asked to shelter several Algerians fleeing from the country’s war for independence.⁹² He describes himself as having been, at the time, a “young socialist journalist” and “Protestant Christian, very tolerant, liberal, and not practicing ... religious, but not too much.”⁹³ In his conversations with the Algerians, he became

⁸⁶ Vidino, *Al-Qaeda in Europe*, p. 33; see also *Der Spiegel* (German), February 9, 1998; *Der Spiegel* (German), April 13, 1998.

⁸⁷ *Deutschlandfunk Network* (German), August 19, 1999; *Handelsblatt* (German), January 30, 2004.

⁸⁸ Quoted in Vidino, *Al-Qaeda in Europe*, p. 33.

⁸⁹ Philipp Jaklin and Hugh Williamson, “Far-Right Has Ties with Islamic Extreme,” *Financial Times* (London), November 9, 2001.

⁹⁰ Michael, *The Enemy of My Enemy*, p. 151.

⁹¹ *Ibid.*, p. 274.

⁹² *Ibid.*, pp. 149-50.

⁹³ *Ibid.*

“fascinated” by Islam, and recited his *shahada* (declaration of faith) in 1962. According to Huber, upon urging from the Egyptian embassy in Switzerland, he later repeated his *shahada* in Cairo, where he met Egyptian president Gamal Abdel Nasser.⁹⁴ By Huber’s account, it was Nasser who sparked his later devotion to Nazism. Huber described meeting Nasser as “a complete cultural shock,” as “Nasser explained to [Huber] some things about the Third Reich and about the Second World War, and about Adolf Hitler.”⁹⁵ These conversations helped pave the way for Huber’s embrace of neo-Nazism, and helped to form Huber’s views on the convergence between Nazism and militant Islamism.

In an interview he conducted with Huber, George Michael learned more about Huber’s views on this convergence. He found that Haj Muhammad Amin al-Husseini, the World War II-era pro-Nazi grand mufti of Jerusalem, “was instrumental in shaping Huber’s views, not only on Islam but also on the Third Reich.”⁹⁶ Husseini—who is discussed subsequently in this report’s section on the historical convergence—served as a conduit between Adolf Hitler and the Arab world during World War II.

Though Huber was a Sunni Muslim, he also displayed clear affinities for Shia militant figures. Huber told Michael that he “became more deeply involved with Islam” after traveling to Iran and meeting with Ayatollah Khomeini in the mid-1980s. Huber said that he “became very much touched by Shi’ite Islam and felt [sympathy] for the legality of the Shi’a Muslim and especially for the Islamic republic.”⁹⁷ This trip to Iran came when the Islamic Republic was at its most overtly militant and ideological. That Huber’s trip during this period would cause him to openly endorse the new Iranian regime despite the deep schism between Sunni and Shia Islam illustrates that Huber prioritized anti-Semitism and anti-Americanism above all else, defining his heroes and allies in juxtaposition to the out-groups that he opposed. Huber confirmed this in his interview with Michael, saying:

There are two great menaces, the power of Zionism in the United States over the United States, and as a consequence of this, the utterly hostile policies of the United States government, not only Mr. Bush but Mr. Clinton before him, and lots of presidents before him against the Muslim world, which is of course especially the creation of the so-called state of Israel in the Palestinian part of Dar-al-Islam.⁹⁸

On November 7, 2001, Huber was named by the U.S. Department of the Treasury as one of several key terrorist financiers associated with the banking group al-Taqwa. Al-Taqwa’s support for terrorism was significant enough, in the estimation of U.S. officials reviewing the best information available, that President George W. Bush spoke of its closure at length in an announcement. President Bush stated:

Acting on solid and credible evidence, the Treasury Department of the United States today blocked the U.S. assets of 62 individuals and organizations connected

⁹⁴ Ibid., p. 150.

⁹⁵ Ibid.

⁹⁶ Ibid., p. 151.

⁹⁷ Ibid.

⁹⁸ Ibid., p. 274.

with two terrorist-supporting financial networks, the Al Taqwa and the Al Barakaat. Their offices have been shut down in four U.S. states, and our G-8 partners and other friends, including the United Arab Emirates, have joined us in blocking assets and coordinating enforcement action. Al Taqwa is an association of offshore banks and financial management firms that have helped Al Qaeda shift money around the world.... Al Taqwa and Al Barakaat raise funds for Al Qaeda. They manage, invest and distribute those funds. They provide terrorist supporters with Internet service, secure telephone communications and other ways of sending messages and sharing information. They even arrange for the shipment of weapons. They present themselves as legitimate businesses. But they skim money from every transaction for the benefit of terrorist organizations. They enable the proceeds of crime in one country to be transferred to pay for terrorist acts in another.⁹⁹

Huber admitted to George Michael that he served as a member of al-Taqwa's administration council from 1988 until the bank's closure in 2002.¹⁰⁰ Although Huber denied any operational link to al-Qaeda, he was clearly "enthusiastic over the 9/11 attacks," as he "saw them as a catalyst that would bring together elements of the extreme right and militant Islam."¹⁰¹ As Huber told George Michael:

The new alliance has come. The eleventh of September has brought together [the far right and militant Islam] because the new right has reacted positively.... They say, and I agree with them 100 percent, what happened on the eleventh of September, if it is the Muslims who did it, it is not an act of terrorism but an act of counterterrorism.¹⁰²

Similarly, Huber told a CNN interviewer in 2002 that al-Qaeda was "a very honorable organization... If they killed a few American generals in the Pentagon, I don't feel very sorry, because these guys have done a lot of trouble."¹⁰³ The same video shows the interior of Huber's study, which features portraits of Iran's supreme leader, Adolf Hitler, and Osama bin Laden, as well as a relic Huber prizes: a physical piece of Hitler's house.

Further demonstrating the links that Huber was trying to build between Islamist militancy and neo-Nazism, in the summer of 2001 Huber collaborated with the Holocaust-denying Institute for Historical Review (IHR) and several European far-right colleagues in an effort to host a conference in Beirut on "Revisionism and Zionism."¹⁰⁴ His efforts ultimately fell flat, as Lebanese authorities banned the conference before it could kick off.

Sascha Lemanski (Sascha L.). Consistent with German privacy laws that limit dissemination of a defendant's last name, this German citizen is known only as Sascha L. in most of the reporting on

⁹⁹ Full statement republished in "In Bush's Words: Attack on '2 Terrorist-Supporting Financial Networks,'" *New York Times*, November 8, 2001.

¹⁰⁰ Michael, *The Enemy of My Enemy*, p. 155.

¹⁰¹ *Ibid.*, p. 156.

¹⁰² *Ibid.*

¹⁰³ "Links Between American, European Terrorist Groups," CNN.com, March 5, 2002, http://transcripts.cnn.com/TRANSCRIPTS/0203/05/i_ins.01.html.

¹⁰⁴ *Ibid.*

his case, but I was able to track down his last name. Lemanski is a former neo-Nazi arrested in Germany in February 2017 for allegedly plotting an attack on ISIS's behalf. According to reports, Lemanski previously identified with a prominent neo-Nazi group in Germany known as the Immortals. Prior to his conversion, he had publicly accused Muslims of causing the "creeping death of the people," and of trying to impose *sharia* in Germany. In a May 2013 YouTube video entitled "Tips for the fight against cockroaches," Lemanski called for attacks against immigrants in Germany.¹⁰⁵

But in 2014, Lemanski converted to Islam, and was later charged with disseminating ISIS messages online.¹⁰⁶ In February 2017, German authorities arrested Lemanski as he was planning a terrorist attack. In interrogations after his arrest, Lemanski "admitted to planning to lure police officers or soldiers into a trap and then kill them with a home-made explosive."¹⁰⁷ Authorities also recovered "materials required for the construction of an unconventional blasting device," including "chemical materials required for the production of an acetone peroxide explosive device, as well as the electronic components required for remote ignition."¹⁰⁸

Devon Arthurs. On May 19, 2017, authorities responded to a hostage situation at Green Planet Smoke Shop in Tampa, Florida, in which 18-year-old Devon Arthurs held three people at gunpoint. The criminal complaint against Arthurs describes the situation:

Devon Arthurs entered the Green Planet Smoke Shop, located at 15325 Amberly Dr, Tampa, FL 33647. The store was occupied by an employee/victim#1 and a customer/victim #2. Devon Arthurs lifted up the back of his t-shirt and removed a black semiautomatic pistol from his rear waistband. Victim #1 stated that Arthurs pointed a gun at her and told her to get on the ground. Victim #2 stated that Arthur yelled, "Do me a favor and get the fuck on the ground!" Both victims complied with the demand. Victim #2 also advised that Arthur asked him, "Why shouldn't I kill you?" Arthurs made these demands and asked these questions from a distance of no more than five feet from both victim #1 and #2. Both victim #1 and #2 were placed in fear for their life.

Approximately two to three minutes after Arthurs entered the Green Planet Smoke Shop, a second customer/victim #3 enters the store. Arthurs orders victim #3 down to the ground but does not threaten him with the firearm. Arthurs informed all three victims in the store that he had already killed somebody. He further informed all three victims that he was upset due to America bombing his Muslim countries.¹⁰⁹

Tampa police reached the smoke shop minutes after the third hostage had entered, and arrested Arthurs shortly thereafter. When asked if anyone else was hurt, Arthurs confessed that he had

¹⁰⁵ Adam Taylor, "German Police Say Suspected Islamist Extremist Accused of Plot Was Once a Neo-Nazi," *Washington Post*, February 28, 2017.

¹⁰⁶ Ben Knight, "Suspected German Islamist 'Used to be Neo-Nazi,'" *Deutsche Welle*, February 27, 2017.

¹⁰⁷ *Ibid.*

¹⁰⁸ "Hier baute der Salafist (26) an der Bombe," *Bild*, February 23, 2017, <http://www.bild.de/regional/hannover/festnahme/terror-verdaechtiger-in-northeim-festgenommen-50572032.bild.html>.

¹⁰⁹ *Florida v. Arthurs*, case no. 292017CF007587000AHC, criminal report affidavit, May 21, 2017, p. 1.

killed two people in his apartment.¹¹⁰ On further investigation, officers found the bodies of Jeremy Himmelman and Andrew Oneschuk, both of whom were killed by gunshot wounds to the upper body and head.¹¹¹ During the subsequent interrogation, Arthurs confessed to killing both of them, identifying the victims as “personally known to him,” and providing specific details about how they were murdered.¹¹² Subsequent reporting by the *New York Times* has identified the two men as roommates of Arthurs.¹¹³ According to the criminal complaint:

Arthurs advised that the shooting stemmed from Himmelman and Oneschuk disrespecting Arthurs’ Muslim faith. Arthurs stated that all of them had been friends with a common neo-Nazi belief, until Arthurs converted to [Islam]. Since then, Arthurs stated, he has become angered by the world’s anti-Muslim sentiment and had wanted to bring attention to his cause.¹¹⁴

Indeed, according to the criminal complaint, Arthurs made religious references in Arabic subsequent to his arrest, while being walked to a patrol vehicle. Arthurs further stated, “I had to do it. This wouldn’t have had to happen if your country didn’t bomb my country.”¹¹⁵

Thus, by Arthurs’s own account, he had been a devoted neo-Nazi prior to his conversion to Islam. Though not all the details of his newfound faith are known, Arthurs explained that he murdered two people and subsequently took hostages in response to disrespect for his faith, and in retaliation for American foreign policy. Arthurs’s explanation of his actions tracks with both grievance-based and ideology-based explanations for radicalization to violent extremism.

Thomas Usztics

Thomas Usztics is a German national and former neo-Nazi who converted to Islam in his early twenties and travelled abroad to join the Deutsche Taliban Mujahideen (DTM), which is based in the Afghanistan/Pakistan region (Waziristan and Hindu Kush). DTM is a militant splinter group that was originally part of the Islamic Jihad Union. DTM is composed of German-speaking Islamists, and prioritizes the ouster of non-Muslim forces from Afghanistan, including German soldiers, while simultaneously espousing attacks on German soil.¹¹⁶

Born in 1985 to parents who had immigrated from Hungary, Usztics had ties to the far-right and neo-Nazi scenes in his youth.¹¹⁷ Usztics converted to Islam in early 2008, and radicalized quickly, joining DTM within a year of his conversion.¹¹⁸ With DTM, Usztics adopted the *nom de guerre*

¹¹⁰ Ibid., pp. 1-2.

¹¹¹ Ibid., p. 2.

¹¹² Ibid.

¹¹³ Jonah Engel Bromwich, “Man in Florida Told the Police He Killed Neo-Nazi Roommates for Disrespecting His Muslim Faith,” *New York Times*, May 24, 2017.

¹¹⁴ *Florida v. Arthurs*, criminal report affidavit, p. 2.

¹¹⁵ Ibid.

¹¹⁶ Press statement 20/2012 from the press office of the federal prosecutor (*Pressemitteilung 20/2012 der Pressestelle der Bundesanwaltschaft*), August 3, 2012, <https://www.berlin.de/gerichte/presse/pressemitteilungen-der-ordentlichen-gerichtsbarkeit/2012/pressemitteilung.426216.php>.

¹¹⁷ Karin Priester, *Warum Europäer in den Heiligen Krieg ziehen: Der Dschihadismus als rechtsradikale Jugendbewegung* (Frankfurt, Germany: Campus Verlag, 2017), p. 266.

¹¹⁸ Florian Flade, “Islamist Thomas U. wollte zurück nach Deutschland,” *WeltN24*, September 11, 2010, <https://www.welt.de/politik/ausland/article9552830/Islamist-Thomas-U-wollte-zurueck-nach-Deutschland.html>.

of Hamsa al-Majaari (Hamsa the Hungarian). He received weapons and explosives training, took part in an attack against a NATO base that housed American and Afghan forces, and appeared in two jihadist propaganda videos.¹¹⁹ In these videos, Usztics threatened that the group would continue fighting until all Western troops had left Afghanistan, and urged all Muslims living in Germany to join the jihad in the Hindu Kush, either by physically travelling to join the fight, or at the very least through monetary support.¹²⁰ He implored his co-religionists in one video: “Sell your belongings so we can continue buying weapons.” Usztics also contacted German citizens by email, and through this correspondence took to “demanding political and financial support” for DTM.¹²¹

Despite his obvious fanaticism, Usztics became disillusioned with DTM, and disheartened by the hardships he suffered. Usztics would later explain the reasons for his change of heart in some detail. He revealed the living conditions that he and his wife (also a German convert, whom he had brought along to Waziristan) had to endure, which he described as unfit for human habitation. Usztics described a shocking lack of hygiene, people who “were spitting and vomiting,” and disrespectful treatment of women.¹²² Turning to this last area of disillusionment, Usztics commented that only when he arrived in Turkey, “finally I could hold hands with my wife in public.”¹²³ But the biggest factor prompting Usztics’s split from DTM was the gruesome deaths of his German friends in a firefight with Pakistani soldiers.¹²⁴

Usztics and his wife planned to travel to Turkey through Iran, from where they would fly to Copenhagen, and subsequently drive back to Germany.¹²⁵ But they were arrested in Turkey and extradited to Germany, where Usztics was sentenced to four years and three months in prison for membership in a terrorist group, and preparation of a serious act of subversion while abroad.¹²⁶

Like David Myatt, Usztics has now renounced jihadism.¹²⁷ Nonetheless, his case exemplifies how an initial sympathy or adherence to neo-Nazi ideology can be conducive to an ideological shift toward jihadism.

Diego José Frías Álvarez

The case of Diego José Frías Álvarez exemplifies how a commitment to anti-Semitism can bridge the ideological divide between Nazism and jihadism. Frías Álvarez is a Spanish neo-Nazi activist and former member of the Republican Social Movement (MSR: Moviment Social Republicà), one of Spain’s most active neo-fascist and extreme right-wing formations. His political militancy

¹¹⁹ “Deutscher Taliban-Kämpfer muss ins Gefängnis,” *Spiegel Online*, December 13, 2012, <http://www.spiegel.de/politik/deutschland/talibankaempfer-aus-deutschland-muss-fuer-mehrere-jahre-ins-gefaengnis-a-872757.html>.

¹²⁰ Flade, “Islamist Thomas U. wollte zurück nach Deutschland.”

¹²¹ “Deutscher Taliban-Verdächtiger angeklagt,” *Süddeutsche Zeitung*, August 3, 2012, <http://www.sueddeutsche.de/politik/bundesstaatsanwaltschaft-ermittelt-deutscher-taliban-verdaechtiger-angeklagt-1.1430924>.

¹²² Mark Silinsky, *The Taliban: Afghanistan’s Most Lethal Insurgents* (Santa Barbara, CA: Praeger, 2014), p. 144.

¹²³ *Ibid.*

¹²⁴ *Ibid.*

¹²⁵ Flade, “Islamist Thomas U. wollte zurück nach Deutschland.”

¹²⁶ Press statement 20/2012 (*Pressemitteilung 20/2012 der Pressestelle der Bundesanwaltschaft*).

¹²⁷ “Früherer Berliner Taliban-Kämpfer zu Haft verurteilt,” *Hamburger Abendblatt*, December 13, 2012, <https://www.abendblatt.de/politik/deutschland/article111996221/Fruerherer-Berliner-Taliban-Kaempfer-zu-Haft-verurteilt.html>.

reached its zenith when he topped the MSR's electoral appointment list in the 2006 parliamentary elections. However, Frías Álvarez achieved meager results, winning about 0.04% of the total votes.¹²⁸ In addition to MSR's connection to other clearly anti-Semitic parties, it also allied with European far-right parties with anti-Muslim politics.¹²⁹

In mid-2015, Frías Álvarez was arrested by the Mossos d'Esquadra (the Catalan police force) for his suspected involvement with a jihadist cell known as the "Islamic Fraternity for the Preaching of Jihad." Though not a convert, he was a collaborator and co-conspirator of the cell, as he mainly provided material assistance in the form of a weapons arsenal and suggested targets to be attacked.

The leader of the cell, Antonio Sáez Martínez, a Granada barber who converted to Islam in 2012 and was subsequently known as Aalí, initially used the network to send recruits to ISIS camps in Syria and Iraq.¹³⁰ But as authorities arrested several would-be foreign fighters, the cell redirected its efforts to committing attacks around Barcelona.¹³¹ One example of a planned attack (which would starkly mirror ISIS's own torture and slaughter of its victims) was to kidnap a victim, put him in an orange jumpsuit, and behead him in front of running cameras.¹³² Other planned attacks, for which Frías Álvarez and other members of the cell were arrested, included the bombing of a Jewish bookstore, and further attacks against synagogues, the Parliament of Catalonia, and police stations.¹³³

Initially the Islamic Fraternity lacked the necessary materials to carry out such attacks. Thus, Frías Álvarez was introduced to the plot through a contact of Sáez Martínez, as the neo-Nazi was understood to be an intermediary capable of obtaining weapons and explosive materials.¹³⁴ But the role Frías Álvarez played in the plot was not that of a mere middle man. Demonstrating how jihadists and neo-Nazis can be bound together by common enemies, Frías Álvarez suggested several targets in the Barcelona metropolitan area to the cell, such as the Mossos d'Esquadra police department on the Plaza de España. This central role played by the neo-Nazi was corroborated by two witnesses who are now under police protection, and also by photographs found on mobile phones from some of the arrestees.¹³⁵

¹²⁸ "Uno de los detenidos de la célula yihadista fue candidato de un partido ultra," *La Vanguardia*, April 4, 2015, <http://www.lavanguardia.com/politica/20150411/54429553871/detenidos-celula-yihadista-candidato-partido-ultra.html>.

¹²⁹ Joan Cantarero, "Anglada fichó al neonazi yihadista tras aliarse con los islamófobos europeos", *Público*, May 19, 2015, <http://www.publico.es/politica/anglada-ficho-al-neonazi-yihadista.html>.

¹³⁰ Fernando J. Pérez, "Los yihadistas detenidos en Cataluña planeaban asesinar al estilo de EI," *El País*, April 10, 2015, https://politica.elpais.com/politica/2015/04/10/actualidad/1428670827_608759.html.

¹³¹ Matt Moffett, "Spanish Terror Raid Shows Persistence of Extremists Blocked from Heading Abroad," *Wall Street Journal*, May 4, 2015.

¹³² "Islamisten planen Anschläge zusammen mit Neonazi," *Zeit Online*, April 4, 2015, http://www.zeit.de/gesellschaft/zeitgeschehen/2015-04/terror-spanien-islamismus-enthaftung?google_editors_picks=true.

¹³³ Pérez, "Los yihadistas detenidos en Cataluña."

¹³⁴ "Diego José Frías guardaba las armas de los yihadistas de Catalunya", *Teinteresa*, April 10, 2015, http://www.teinteresa.es/espana/Diego-Jose-Frias-yihadistas-Catalunya_0_1336667769.html.

¹³⁵ Pedro García Campos, "Cómo un neonazi se alió con los presuntos yihadistas que querían atacar en Barcelona," *Vice News*, August 11, 2015, <https://news.vice.com/es/article/como-neonazi-alio-presuntos-yihadistas-que-querian-atacar-barcelona>.

Thus, though Diego José Frías Álvarez had been active in political and social groups that overtly flaunted anti-Muslim sentiments, his deep-seated hatred for Jews made him a natural associate of a jihadist terror cell. Such ideological synergy enables and facilitates an alliance that at first may seem improbable.

The Historical Convergence

In Ahmed Huber's estimation, the historical convergence between Nazism and militant Islamism is best exemplified by the collaboration of Haj Muhammad Amin al-Husseini, who had been the grand mufti of Jerusalem, with Hitler's Nazi regime. Other figures who have embraced the convergence between these two ideological streams agree with Huber, as do scholars and researchers. George Michael writes, "Perhaps no other figure did more to foster ties between right-wing extremism and militant Islam than [Husseini], as his ideology informed both pan-Arabism and militant Islam."¹³⁶ Husseini was both anti-Semitic and anti-British, a combination that "dovetailed with Hitler's policies during this period."¹³⁷ According to scholar Raphael Israeli, the grand mufti was extremely anti-Semitic even before Jewish mass migration to Palestine. Israeli notes that in 1929 Husseini incited Palestinian crowds to "kill and maim fellow inhabitants of Jerusalem, Hebron, and other cities, for no other reason than their being Jewish."¹³⁸ Israeli notes that Husseini "loathed the Jews for being a harbinger of westernism, modernism, secularism, and liberalism in the Middle East."¹³⁹

Though Husseini began cultivating ties to the Nazi movement as early as 1933, a publicly acknowledged reciprocal, cooperative relationship did not form until 1937, when the British Royal Commission published the Peel Report recommending that Palestine be divided into separate Jewish and Arab states. Following the Peel report's publication, Husseini publicly voiced his support for the Third Reich, and requested that the Nazis assist him in his fight against the Jews.¹⁴⁰ Fearing that statehood might bolster and strengthen "international Jewry," the Germans began to see the Arabs as "assets" for the Nazi cause, and to view Husseini as a potential strategic partner in the Middle East.¹⁴¹ Nazi Germany began supplying Palestinian Arabs with weapons to fight the Jews, while the Palestinian press in turn actively promoted European Nazism and anti-Semitic propaganda.¹⁴² On October 2, 1937, Husseini met with Nazi officials Adolf Eichmann and Herbert Hagen, who traveled to Mandatory Palestine disguised as a journalist and a student, respectively.¹⁴³ Toward the end of 1937, Husseini was forced to flee Palestine in order to avoid arrest for inciting a rebellion against the British Mandate.¹⁴⁴

¹³⁶ Michael, *The Enemy of My Enemy*, p. 112.

¹³⁷ *Ibid.*, p. 113.

¹³⁸ Raphael Israeli, *The Death Camps of Croatia: Visions and Revisions, 1942-1945* (New Brunswick, NJ: Transaction Publishers, 2013), p.121.

¹³⁹ *Ibid.*

¹⁴⁰ Michael, *The Enemy of My Enemy*, p. 113.

¹⁴¹ Klaus-Michael Mallmann and Martin Cüppers, *Nazi Palestine: The Plans for the Extermination of the Jews in Palestine* (New York, NY: Enigma Books, in association with the United States Holocaust Memorial Museum, 2005).

¹⁴² *Ibid.*

¹⁴³ The National Library of Israel, "Adolf Eichmann's Clandestine Visit to Palestine," accessed April 29, 2017, http://web.nli.org.il/sites/NLI/English/library/reading_corner/Pages/eichmann_secret_visit.aspx.

¹⁴⁴ David Patterson, "Nazis, Jihadists, and Jew Hatred," Institute for the Study of Global Antisemitism and Policy, September 30, 2016, <http://isgap.org/flashpoint/nazis-jihadists-and-jew-hatred/>.

By 1939, Husseini was operating out of Baghdad, and was funded by the Nazis.¹⁴⁵ While in Iraq, he collaborated with Rashid Ali al-Gaylani to orchestrate a Nazi-backed coup against the Iraqi government. Though Britain suppressed the coup, it only did so after “al-Husseini issued a fatwa announcing a jihad against Britain and the Jews.”¹⁴⁶ When the British stopped the coup, Husseini was forced to flee once again. In November 1941, he settled in Berlin, and almost immediately obtained an audience with Hitler himself. Husseini pledged his support for the Third Reich. Hitler assured the grand mufti of the Nazis’ commitment to exterminating the Jews, and dubbed Husseini the leader of the Arab world, even promising to eventually make Husseini the “Arab führer.”¹⁴⁷

In the years that followed, Husseini played an important role for the Nazis. In 1943, he helped organize the 13th *Waffen* Mountain Division of the SS *Handschar*, a volunteer force in the former Yugoslavia composed predominantly of Bosnian Muslims. (As will be discussed subsequently in this report’s section on the cultural significance of items in the defendant’s possession, the defendant had photos of the 13th *Waffen* Mountain Division in his electronic files.) George Michael notes that, to advance the recruitment of Bosnian Muslims, Husseini wrote a “motivational treatise” entitled *Islam and the Jews* intended to inspire Bosnian Muslim SS units, and promote their involvement in the Jewish genocide.



A photograph of al-Husseini and Hitler that was in the defendant’s possessions (GX 10-231).

In January 1944, Husseini began making pro-Axis radio broadcasts to the Arab world in which he implored Muslims to aid the Nazi slaughter, and stressed the ideological affinities between German National Socialism and Islam.¹⁴⁸ In one broadcast, he urged Muslims to “kill the Jews wherever you find them. This pleases God.”¹⁴⁹

Following Nazi Germany’s defeat, Hitler’s erstwhile officers had to flee to new homes lest they be held accountable for their role in the regime’s atrocities. A large number of Hitler’s men went to the Middle East. Huber’s recollection of Gamal Abdel Nasser’s fondness for Hitler, for example, was consistent with the Nasser regime’s sheltering of Nazi war criminals. Nazi commando Otto Skorzeny (a figure who was featured in the defendant’s collections and personal notes) trained thousands of Egyptians in guerilla and desert warfare, and even organized early Palestinian terrorist forays into Israel and the Gaza Strip in the mid-1950s. Johann von Leers, who had been a high-ranking assistant to Nazi propaganda minister Joseph Goebbels, produced material for Nasser attacking the United States and Israel. Von Leers even converted to Islam, adopting the name

¹⁴⁵ Ibid.

¹⁴⁶ Patterson, “Islamic Jihadism and the Legacy of Nazi Antisemitism,” p. 191.

¹⁴⁷ Michael, *The Enemy of My Enemy*, p. 115; Patterson, “Islamic Jihadism and the Legacy of Nazi Antisemitism,” p. 191.

¹⁴⁸ Patterson, “Islamic Jihadism and the Legacy of Nazi Antisemitism,” p. 192.

¹⁴⁹ Ibid.

Oman Amin von Leers. Corresponding with a fellow fascist, von Leers opined that “if my nation had got Islam instead of Christianity we should not have had all the traitors we had in World War II.”

Thus, in addition to the case studies of individuals who have embraced both Nazism and Islamist militancy in recent years, there is historical precedent.

The Centrality of Anti-Semitism and the Jewish Scapegoat

As discussed in Part I, a central tenet of extremist ideologies is the attribution of blame to a target out-group. For both Nazis and militant Islamists, the Jewish population is a key out-group. Both movements consider the Jews to be responsible for a disproportionate amount of the misfortunes that befall humankind. This perspective is articulated in copious speeches, statements and writings of militant Islamist and Nazi leaders. For example, in his infamous essay “Our Struggle with the Jews,” Sayyid Qutb—a key figure for militant Islamists—writes: “Everywhere the Jews have been they have committed unprecedented abominations. From such creatures who kill, massacre and defame prophets one can only expect the spilling of human blood and dirty means which would further their machinations and evil.”

Hitler’s sentiments in his autobiography *Mein Kampf* are quite similar. Like Qutb, who accused the Jews of committing “unprecedented abominations,” Hitler asks: “Was there any excrement, any shamelessness in any form, above all in cultural life, in which at least one Jew would not have been involved?”¹⁵⁰ To Hitler, the Jews are universal villains, and their mere existence is menacing and malign. In his book *Roots of Nazi Psychology*, author Jay Y. Gonen explains: “Hitler’s perception was clear and ominous. An ill-understood evil is on the verge of triumph in this world.”¹⁵¹ Indeed, Hitler compares the Jewish people to “maggots” in a “decaying body.”¹⁵²

Both Qutb and Hitler’s statements not only blame and vilify the Jews, but dehumanize them. As mentioned in Part I, the dehumanization of an “out-group” is common among extremist movements, particularly those who seek to incite violence against, or the extermination of, a particular group. In the Nazi and militant Islamist movements, the dehumanization of Jews occurs through degradation and demonization.

Degradation includes the reduction of the Jew to vermin. In the aforementioned quotes, Qutb and Hitler describe the Jews as murderous “creatures,” loathsome “maggots.” They exacerbate the cognitive distance between members of their movements and Jews, thus increasing the acceptability of violence. Indeed, according to Goebbels, the Jews were to be considered “unconditionally exterminable”—a depiction he actively promulgated and emphasized in his statements, and in the Nazi party’s messaging campaigns. As scholar David Livingstone Smith explains, “all that Goebbels could see were vermin: carriers of the Jewish disease—a disease that

¹⁵⁰ Adolf Hitler, *Mein Kampf* (Boston: Houghton Mifflin, 1971 ed.), p. 61.

¹⁵¹ Jay Y. Gonen, *The Roots of Nazi Psychology: Hitler’s Utopian Barbarism* (Lexington, KY: The University Press of Kentucky, 2013), pp. 29-30.

¹⁵² Hitler, *Mein Kampf*, p. 61.

would engulf the world unless it was obliterated.”¹⁵³ In one of Goebbels’s diary entries, he writes that Jews “are no longer human beings, but animals. It is, therefore, also no humanitarian task, but a task for the surgeon. One has got to cut here, and that most radically. Or Europe will vanish one day due to the Jewish disease.”¹⁵⁴

Goebbels’s revulsion toward the Jews is articulated in *The Eternal Jew*—a pro-Nazi “documentary” that he conceived—that depicted the Jews as agents of filth, decay and disease.¹⁵⁵ In one of the film’s most infamous scenes, “a swarm of rats appears on the screen, followed by scenes of rats emerging from sewers and infesting bags of grain.”¹⁵⁶ The narrator states:

Wherever rats appear they bring ruin, by destroying mankind’s good and foodstuffs. In this way, they spread disease, plague, leprosy, typhoid fever, cholera, dysentery, and so on. They are cunning, cowardly, and cruel, and are found mostly in large packs. Among the animals they represent the rudiment of an insidious and underground destruction, just like the Jews among human beings.¹⁵⁷

Today, the depiction of the Jew as the personification of malice and grime persists among spokesmen for both ideologies. Even where Jews are not explicitly described as subhuman by adherents to these movements, their humanity is in some way discounted. For example, Qutb described Jews’ “natural disposition” as characterized by “ingratitude” and “narrow selfishness.” As a result, Qutb asserted, Jews are fundamentally unable to “feel the larger human connection which binds humanity together.” Osama bin Laden reiterated this notion of Jews as detached and callous, highlighting what he described as their murderous intolerance. He states that “Jews believe as part of their religion that people are their slaves, and whoever denies their religion deserves to be killed.”¹⁵⁸ In this way, bin Laden portrayed a disconnect between Jews and the rest of humankind.

The second form of dehumanization exhibited by both groups is demonization. Scholar David Patterson notes that both movements see “the Jew” as someone who “not only commits evil but embodies the essence of evil and is therefore beyond remission.”¹⁵⁹ In *Mein Kampf*, for example, Hitler writes of the “vileness” of the Jew, declaring that “no one need be surprised if among our people the personification of the devil as the symbol of evil assumes the living shape of the Jew.” Similarly, according to Qutb, Jews represent the “blackest devil and source of the worst anti-Islamic machinations.” In both cases, Jews are not only responsible for spreading corruption and evil, but are considered intrinsically wicked and immoral by virtue of their ethnicity.¹⁶⁰

¹⁵³ David Livingstone Smith, *Less than Human: Why We Demean, Enslave, and Exterminate Others* (New York: St. Martin’s Press, 2011), p. 139.

¹⁵⁴ *Ibid.*, p. 138.

¹⁵⁵ *Ibid.*, p. 139.

¹⁵⁶ *Ibid.*

¹⁵⁷ See <https://www.youtube.com/watch?v=RIHVIn56U2w> (relevant video at 17:00).

¹⁵⁸ Quoted in Bruce Lawrence, *Messages to the World: The Statements of Osama bin Laden* (New York: Verso, 2005), p. 190.

¹⁵⁹ David Patterson, “Islamic Jihadism and the Legacy of Nazi Antisemitism,” p. 193.

¹⁶⁰ See, for example, Joseph Goebbels, “Die Juden Sind Schuld!,” *Das eherne Herz* (Munich: Zentralverlag der NSDAP, 1943), pp. 85-91. Goebbels writes: “Every Jew is our enemy in this historic struggle, regardless of whether he vegetates in a Polish ghetto or carries on his parasitic existence in Berlin or Hamburg or blows the trumpets of war

The combination of demonization and degradation as a means of dehumanizing the Jews is imperative to the “exterminationist anti-Semitism” that pervades both ideologies.¹⁶¹ While comparing a particular category of people to disgusting, lowly creatures undoubtedly facilitates the process of moral disengagement necessary for violence, declaring them to actually be an altogether different species provides the justification for extermination. As the scholar Elana Gomel explains:

Saying that a certain category of people is like bacteria still does not give license to exterminate them with impunity... However, if the Jews are really parasites, a different biological species, masquerading as humans but in fact, dangerous, alien and strange, killing them becomes as morally neutral as cleansing a house from bugs.¹⁶²

The “Zionist Conspiracy” and the Jew as an Existential Threat

Hatred and animus toward Jews is further fueled by both movements’ unwavering belief in a “Zionist conspiracy”—the notion that Jews are secretly plotting to take over, or fundamentally manipulate, the world. Contemporary conceptions of this purported conspiracy largely stem from *The Protocols of the Elders of Zion*, a forgery birthed in czarist Russia that claimed to be a “record of secret meetings of Jewish leaders.”¹⁶³ Though the *Protocols* were exposed as a fraud in the 1920s, the document was a key facet of Nazi propaganda.¹⁶⁴ The Nazi party published at least twenty-three editions of the text between 1933 and the onset of the Second World War.¹⁶⁵ Similarly, in “Our Struggle with the Jews,” Sayyid Qutb frequently references the *Protocols*.

In his book *Milestones*, Qutb further articulates his belief in a “Jewish master plan,” declaring that the Jews intend to “eliminate all limitations, especially the limitations imposed by faith and religion, so that [they] may penetrate into the body politic of the whole world and then may be free to perpetuate their evil designs.”¹⁶⁶ This bigoted attitude is prevalent within the militant Islamist movement, and among contemporary neo-Nazi leaders. For example, in an essay entitled “Who Rules America?”—which was found among the defendant’s belongings¹⁶⁷—William Pierce, the late leader of the domestic extremist group National Alliance, writes: “The Jewish control of the American mass media is the single most important fact of life, not just in America but in the world today. There is nothing—plague, famine, economic collapse, even nuclear war—more dangerous

in New York or Washington. All Jews by virtue of their birth and their race are part of an international conspiracy against National Socialist Germany. They want its defeat and annihilation, and do all in their power to bring it about.”

¹⁶¹ Patterson, “Nazis, Jihadists, and Jew Hatred.”

¹⁶² Elana Gomel, “Aliens Among Us: Fascism and Narrativity,” *Journal of Narrative Theory* 30:1 (2000), p. 134.

¹⁶³ United States Holocaust Memorial Museum, “Protocols of the Elders of Zion: Timeline” (n.d.), <https://www.ushmm.org/wlc/en/article.php?ModuleId=10007244>.

¹⁶⁴ Ibid.; see also Gonen, *The Roots of Nazi Psychology*.

¹⁶⁵ Holocaust Museum, “Protocols of the Elders of Zion: Timeline.”

¹⁶⁶ Sayyid Qutb, *Milestones*, A.B. al-Mehri ed. (Birmingham, England: Maktabah Booksellers and Publishers, 2006), p. 123.

¹⁶⁷ Evidentiary Document GX 10-862.

to the future of our people.”¹⁶⁸ Pierce’s comments are in line with the exterminationist narrative propagated by Hitler and Goebbels.

The power of this narrative, and its prevalence in the contemporary neo-Nazi movement, is also evident in the comments and writings of the movement’s followers. In a March 22, 2017 post appearing in the “Jewish Problem” section of the neo-Nazi website *Daily Stormer*, an author claims that the Jews maintain “a multi-generational regime of subversion,” and asserts: “It’s all outlined in *The Protocols of the Learned Elders of Zion*.”¹⁶⁹ Another *Daily Stormer* commenter claims: “Folks, the backroom Globalist Jews have been steadily working to destroy you and the hopes and dreams for your children.”¹⁷⁰

Neo-Nazis and jihadists generally use the terms “Jews” and “Zionists” interchangeably. In his essay “The Jewish Problem,” William Pierce declares the two to be synonymous, describing “professional Zionists” to be the “most Jewish of the Jews.”¹⁷¹ Similarly, the scholar Bassam Tibi notes, in evaluating al-Qaeda and other militant Islamist movements: “When al-Qaeda was established in 1998, it adopted a mission to ‘fight Jews and crusaders.’ Its founding statements make little distinction between Jews and sahyuniyyun (Zionists).”¹⁷² Instead, they maintain that Islam is “under siege,” and that “world Jewry,” or “world Zionism,” is waging a war against Islam with the help the United States.¹⁷³ For example, in a speech urging supporters to “erupt volcanoes of jihad everywhere,” ISIS leader Abu Bakr al-Baghdadi accused “the Jews” of “covertly and stealthily” joining the U.S. campaign against ISIS, and urged Muslims throughout the Middle East to fight “the agents of the Jews and crusaders, their slaves, tails and dogs.”¹⁷⁴

The salience of anti-Semitism and the scapegoating of Jews plays a key role in the ability of some individuals to move seamlessly from neo-Nazism to the militant Islamist movement. Both movements possess clearly defined in-groups and out-groups. As discussed in Part I, it is essential to extremist movements to cultivate a sense of self or community on behalf of whom one is fighting, as well as to define an enemy. This shared out-group of the Jews has proven critical to individuals who move between, or simultaneously embrace, Nazism and militant Islamism. In a vacuum, of course, Nazism and militant Islamism should be opposed to one another. Qutb contended that “there can be no permanent peaceful coexistence between a community implementing God’s law and other communities,” which is consistent with the subsequent writings and teachings of militant Islamist figures. And, as observed previously in this report, a committed Nazi would view many Muslims as racially suspect. But the “Jewish question” looms large for both ideologies, and in some cases the emphasis on “the Jew” as a scapegoat is more powerful than the movements’

¹⁶⁸ William Pierce, *Who Rules America?* (National Alliance, 1967), p. 17.

¹⁶⁹ Azzmador, “International Jews Court Spics to Ensure Eternal Subversion of American Goyim,” *Daily Stormer*, March 22, 2017, <http://www.dailystormer.com/international-jews-court-spics-to-ensure-eternal-subversion-of-american-goyim/>.

¹⁷⁰ Incogman, “The Real Background of the Jewish Conspiracy,” *Daily Stormer*, October 8, 2013, <http://www.dailystormer.com/the-real-background-of-the-jewish-conspiracy/>.

¹⁷¹ William L. Pierce, “The Jewish Problem,” *The National Vanguard* (n.d.), available at <http://nationalvanguard.org/2014/11/the-jewish-problem/>.

¹⁷² Bassam Tibi, *Islamism and Islam* (New Haven, CT: Yale University Press, 2012), p. 67.

¹⁷³ Discussed in *ibid.*, p. 58.

¹⁷⁴ Quoted in David D. Kirkpatrick & Rick Gladstone, “ISIS Chief Emerges, Urging ‘Volcanoes of Jihad,’” *New York Times*, November 13, 2014.

differences. For some, anti-Semitism renders the transition from one movement to another not only justified, but an imperative.

Of course, while both movements are heavily influenced by anti-Semitism, they have claimed a wide range of victims. In recent years, for example, we have seen ISIS slaughter members of such minority religious communities in Iraq as the Christians and Yazidis; boast openly of taking sex slaves; launch terrorist attacks that kill indiscriminately at Christmas markets or cafés; launch lethal bomb attacks against church services, and at concerts frequented primarily by young girls; and separate non-Muslims from Muslims before slaughtering them in restaurants or shopping malls. Jews may be the scapegoat, but they are not the sole victims.

Conclusion

Based on the above, I conclude that evidence an individual's affinity for Nazism is related to the question of whether that individual is predisposed to supporting militant Islamist groups. To underscore the three major reasons for this conclusion, which the report has explained in detail:

- The mechanisms of radicalization that can attract an individual to neo-Nazism and to militant Islam are highly similar.
- There are numerous salient case studies of convergence between Nazi or neo-Nazi ideology and militant Islamism in individuals, and this convergence has historical precedent.
- When individuals have been attracted to or immersed in neo-Nazism, and then converted to Islam, they often dive right into the extremist end of the diverse spectrum of Islamic practice rather than showing interest in more moderate expressions of the faith.

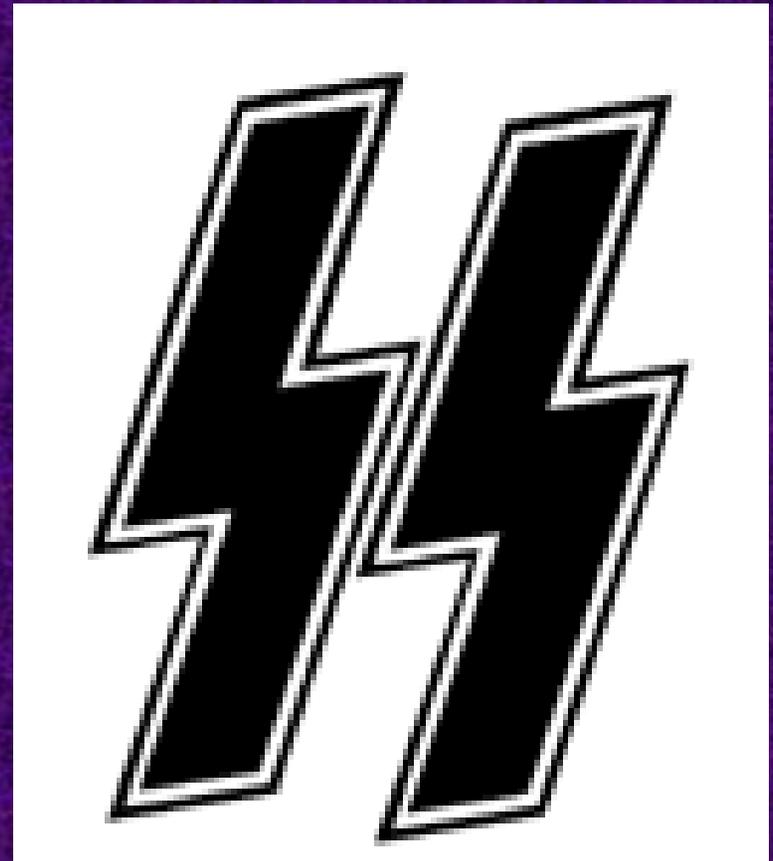
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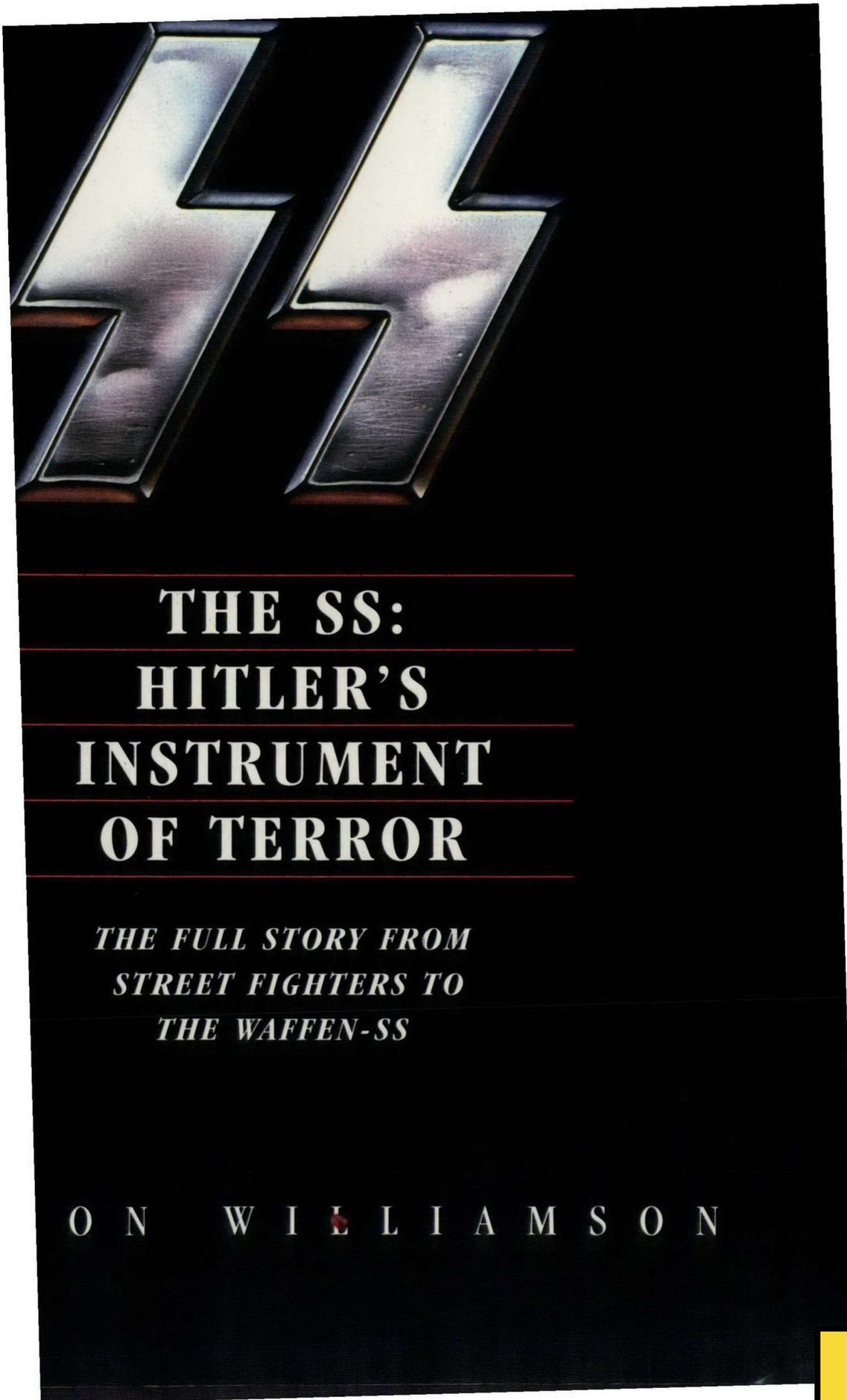
By ENCS (SW) Darrell C. Nolan



Extremist/Supremacist Groups

- SS Bolts used by German special police , prison and concentration camp guards during WWII.
- Used in various tattoos mainly by the Neo-Nazi and Racist skinheads.
- Also used in graffiti and characterizes the belief of these extremist groups in Anti-Semitism, White Supremacy and Fascism.





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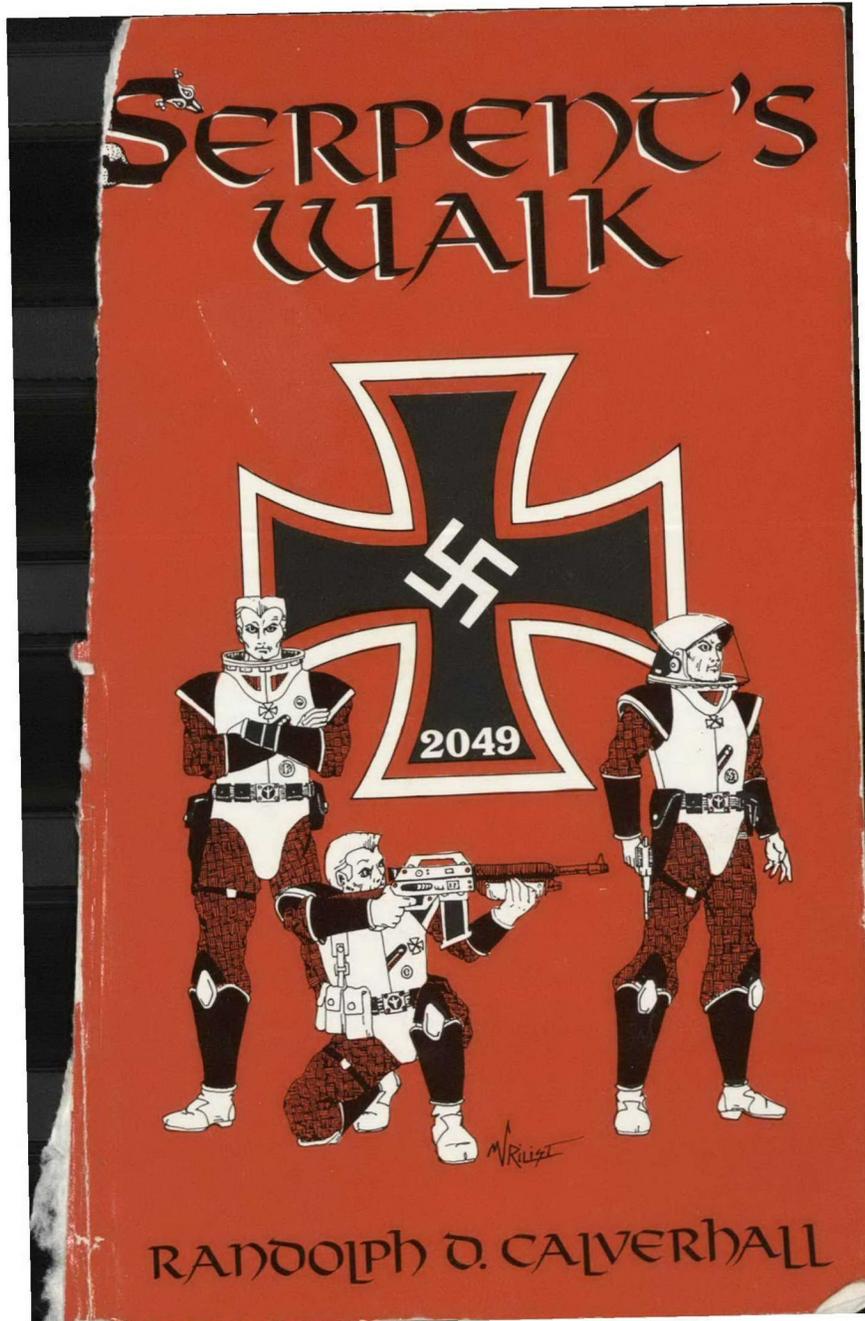
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Type Likes

Summary Ciaphas Cain recommends FBI: Man Known Online As 'Alshishani' Bites Agents Trying To Serve Warrants on wtae.

Object Id S:_I100001312928217:146381298748967

Time 2011-01-08 09:51:40 UTC

Type Comments

Summary Ciaphas Cain commented on a post from January 7, 2011. `And the path to my final victory will be paved with your shattered dreams peasant.`

Object Id S:_I100001312928217:146362202084210

Time 2011-01-08 09:49:48 UTC

Type Likes

Summary Ciaphas Cain liked this post from January 2011.

Object Id S:_I100001312928217:484843208236106:0

Time 2011-01-08 09:49:44 UTC

Type Comments

Summary Ciaphas Cain commented on a post from January 7, 2011. `Thats the excuse I am planning to use if I ever get caught doing anything horrible like eating brains or something. "Devil made me do it!"`

Object Id S:_I100001312928217:146361952084235

Time 2011-01-01 08:36:45 UTC

Type Comments

Summary Ciaphas Cain commented on a post from December 31, 2010. `Of course you don't need that, Boone you boozehound you.`

Object Id S:_I100001312928217:144633408923756

Time 2011-01-01 08:34:39 UTC

Type Comments

Summary Ciaphas Cain commented on a post from December 30, 2010. `I can't even remember the previous one in detail, but after seeing the new one I somehow remembered the previous one being better. I highly recommend T R O N, if you haven't it, actually I recommend seeing it again if you have.`

Object Id S:_I100001312928217:144633152257115

Time 2011-01-01 08:31:14 UTC

Type Comments

Summary Ciaphas Cain commented on a post from December 31, 2010. `As safe as it can get when I am running around the house in my dangerously long man dress, waving my german cavalry sabre..then again, I did that last year during most of my free time, so I don't see why anything should go wrong now.`

Object Id S:_I100001312928217:144632562257174

Time 2010-12-29 06:08:36 UTC

Type Likes

Summary Ciaphas Cain liked this post from December 2010.

Object Id S:_I100001312928217:484843204902773:0

Time 2010-12-25 06:50:34 UTC

Type Comments

Summary Ciaphas Cain commented on a post from December 19, 2010. `Hahaha, its tight, a little like under armor..is the collar and middle 'bedazzled'`

Object Id S:_I100001312928217:142804775773286:1



Name: DSCN1014.JPG

Created Date: 1/28/2006 2:46:54 PM (2006-01-28 19:46:54 UTC)

Accessed Date: 8/2/2007



Name: DSCN1023.JPG

Created Date: 1/28/2006 3:13:06 PM (2006-01-28 20:13:06 UTC)

Accessed Date: 8/2/2007



Name: DSCN1098.JPG

Created Date: 2/2/2006 4:05:56 PM (2006-02-02 21:05:56 UTC)

Accessed Date: 8/2/2007



Name: DSCN1101.JPG

Created Date: 2/2/2006 4:07:38 PM (2006-02-02 21:07:38 UTC)

Accessed Date: 8/2/2007

Internal Reference No.	M-4300
Reference No.	1:16sw554
Date of Production	October 14 th , 2016



Legal

Subscriber Information

essakobayashi@mail.com

Customer Number 219963328
First/Last Name Essa Kobayashi
Street
Registration Date 2014-10-25 18:54:06 UTC
City / Zip Code
Country / Language US / EN-US
Date of birth 1989-04-20
Status Unlocked (bancode 0)
Alternative Email Address
Forwarding Address
Aliases Essakobayashi@mail.com
Registrations 170.170.59.139 / 2014-10-25 18:54
Last Success Logins web 170.170.59.139 2016-07-14 21:21:45

	IP	Access Time	Reason
Logins History	170.170.59.139	2016-07-14 23:21:45	
	170.170.59.139	2016-07-14 23:20:42	Bad credentials
	170.170.59.139	2016-06-14 19:15:14	
	170.170.59.139	2016-02-16 21:59:01	
	170.170.59.139	2015-11-10 21:35:59	
	170.170.59.138	2015-11-05 22:31:48	
	170.170.59.138	2015-10-13 23:14:35	
	170.170.59.138	2015-10-13 23:13:28	
	170.170.59.139	2015-09-07 13:20:57	
	170.170.59.139	2015-09-07 13:20:34	
	170.170.59.138	2015-07-20 18:47:56	
	170.170.59.139	2015-07-10 20:40:26	
170.170.59.138	2015-07-01 18:41:31		



Consensual Recording: Nicholas Young and Mohammed
10/25/2014 Clip 5 (50:58-52:23)

YOUNG: [50:58] (UI) email addresses?

MO: It doesn't ask you personal information?

YOUNG: (UI) After a certain amount of time of being inactive, they kill your account.

MO: Mm, hmm.

YOUNG: It's horrible.

MO: Yeah, it's horrible. And now, now they ask for personal information I guess. Um...(UI)

YOUNG: Pedro.

MO: Pedro (Laughs). Alright, I put random birthday...

YOUNG: I put that one....

MO: ... yeah...

YOUNG: That's Hitler's birthday.

MO: Hitler's birthday?

YOUNG: Yeah.

MO: (Laughs) When was he born? 19...19?

YOUNG: No, no, no he was like, I think he was born just before the 19, like, right before the 1900's, 'cause he was a uh, he was like a 17, 18, 19 year old soldier when World War I was going on, -

MO: Oh really.

YOUNG: - like 1914, so he was born in like 1895 or something. [52:23].



GOVERNMENT
EXHIBIT
4-203
1:16-cr-265

Name: IMG_3609.png

Created Date: 1/28/2014 7:46:17 PM(UTC+0)



GOVERNMENT
EXHIBIT
14-107
1:16-cr-265

Name: godblesshitler.jpg

Created Date: 9/5/2009 6:41:51 PM (2009-09-05 22:41:51 UTC)

Accessed Date: 6/23/2011 10:26:30 PM (2011-06-24 02:26:30 UTC)



GOVERNMENT
EXHIBIT
10-700
1:16-cr-265



GOVERNMENT
EXHIBIT
10-711
1:16-cr-265

THE DEAD

FATHER - O ALLAH, PROTECT MY FATHER FROM THE TOUCH OF THE GRAVE, HE IS IN NEED OF YOUR MERCY AND YOU ARE NOT IN NEED OF PUNISHING HIM.

OH, ALLAH, FORGIVE HIM. OH ALLAH, STRENGTHEN HIM.

ALLAHUM-MAGHRIER LAHU ALLAHUM-MA THABBET-HU.

LET HIM KNOW HOW MUCH I LOVE HIM. REUNITE US LORD.

LET HIM HAVE HEARD ME. ACCEPT HIS SHAHADA. IF NOT EXCUSE HIS IGNORANCE.

GRANDPA, GRANDMA, AUNT NELL, UNCLE EMORY + ALL THE REST. ^{WIFE WITHER} ^{LOUISIG} ^{ROCKY AND WARRI}
GRANDDAD, AUNT DOT, UNCLE SAM, PETER MUSCA, GEORGE KUSSEL + THE REST.

HITLER, SHERIDAN, HART AND AL HUSSEINI, MUSSOLINI, SARDAM HUSEINI.

PROPHET MUHAMMAD, JOHN THE BAPTIST, + ALL THE COMPANIONS + APOSTLES + ^{PEOPLES}

MECHANICAL FEELINGS + BABY. TROY, JIMMY HILL.

JAMES GRANDMOTHER + GRANDFATHER.

THE LIVING

YOM, ASHLEY, AUNT SOE, UNCLE MIKE, JOEL, COUSIN MICHAEL - COMFORT HIM LORD. NANA, DAN, EMILY

UNCLE RANDALL, AUNT MARYANN, DANA, JOSH.

MCULTY, FABRICA, TOM, LIZ, KYCEE, ALEXIS.

TEH STAYS SAFE.

JANICE, GIVE HER FAITH AND DISCIPLINE. HELP HER ACHIEVE HER AMBITIONS, KEEP HER SAFE AND HAPPY. HELP HER SKILL, LET HER KNOW SHE IS LOVED AND BEAUTIFUL. HELP HER GRADES, KEEP HER AWAY FROM CLUBS. HELP HER PRAYER. PROTECT

ABDULLAH. PROTECT HER MOM AND DAD. KEEP HER, DAD +

GRANDFATHER HEALTHY (EYESIGHT / DIABETES / RESTORE)

BOJ PAUL

COWORKERS

BROKENBOURGH, OVERTON, BETHANY, BURKHOLDER, OLIVER, GARCIA, FISHER,
STORES, REBAR - GET IN SHAPE, STAY AWAY FROM SMOKE, FAMILY
LIFE GOES GOOD. STUDENT, EORANKS, MOWER, DONAVAN, YOUNG,
TIFFANY, MORGAN, COATES, ESTHER, JULY, SALLY SR.

UMMAH

^{BEAUTY} SALEH, KHASEEM, KHALIL, ASIF, UMER, ABDUL RAZAK, ^{SAUSER} BAZER;
USAMA MURRAL, ^{COMPANY} ASHKAN, BIZWAN, SPHER, SPAD + WIFE + KID. ^{BILAL}
^{ZAHID} RASER, AHMAD AND FAMILY, BUSINESS + NEWS. ^{YUSEF} ESTER

ALI AL TIMEHI

ALL THE PRISONERS

PEOPLE OF AFGANISTAN, IRAQ, PAKISTAN

966-504-244666



Name: 200px-Otto_Skorzeny_young.jpg

Created Date: 12/7/2007 4:05:56 PM (2007-12-07 21:05:56 UTC)

Accessed Date: 8/26/2016





GOVERNMENT
EXHIBIT
10-250
1:16-cr-265

Name: qatar_report3.gif

Created Date: 12/7/2007 4:05:54 PM (2007-12-07 21:05:54 UTC)

Accessed Date: 8/26/2016

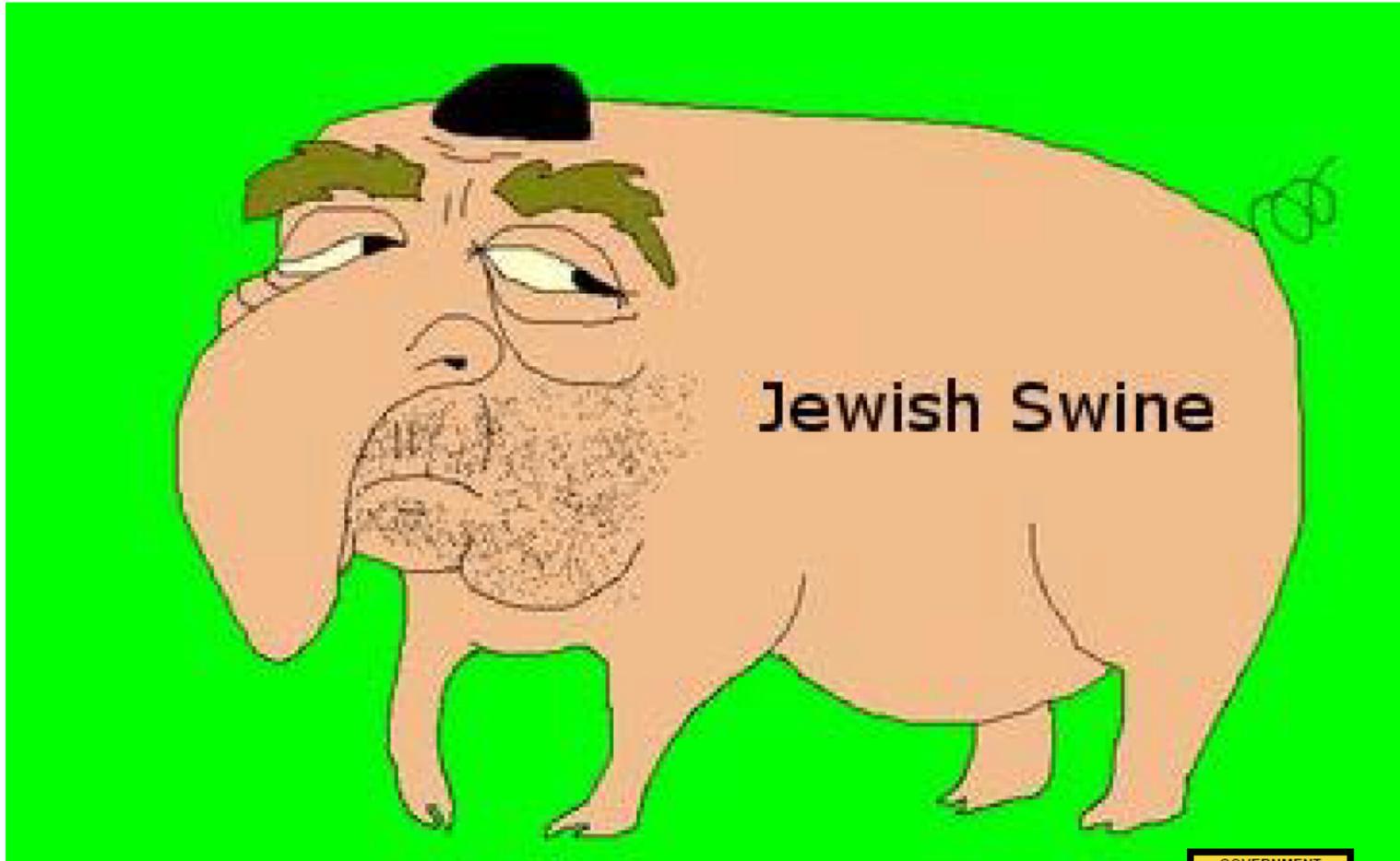


GOVERNMENT
EXHIBIT
10-251
1:16-cr-265

Name: qatar_report8.gif

Created Date: 12/7/2007 4:05:55 PM (2007-12-07 21:05:55 UTC)

Accessed Date: 8/26/2016



GOVERNMENT
EXHIBIT
10-252
1:16-cr-265

Name: 304733_733_avatar.jpg

Created Date: 12/7/2007 4:05:53 PM (2007-12-07 21:05:53 UTC)

Accessed Date: 8/26/2016



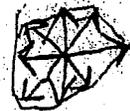
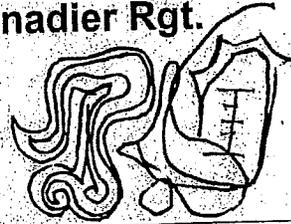
Name: isrldvl.bmp

Created Date: 11/16/2009 1:31:42 AM (2009-11-16 06:31:42 UTC)

Accessed Date: 6/23/2011 10:43:37 PM (2011-06-24 02:43:37 UTC)

5 Kompanie B 19. Panzergrenadier Rgt.

Alert Roster



Ustuf. Dietrich Meyer 	Gren. Klaus Göth
Ustuf. Otto Müller E-mail: _____et	Gren. Eugen Grabenräuber
Ustuf. Fritz Rentropp 	Gren. Johann Stefan 07676 _____oimail.com
Strm. Klaus Düsselkamp Nicholas Young 12711 Sabastian Drive 12312 Oak Creek Fairfax, VA 22030 Home: 703-815-6666 FAIRFAX VA Cell: 571-275-3813 22033 E-mail: NY1203@aol.com	Obgren. Karl Hohmann Terrace 454
Rttf. Christoph Braun E-mail: _____	Gren. Josef Schössler Needs Updating _____ast.net

GOVERNMENT EXHIBIT
(redacted)
 10-706

Firefox File Edit View History Bookmarks Tools Window Help

LiveLeak.com - Channel: d... x +

https://www.liveleak.com/c/dusselkamp

liveleak dusselkamp

IP Locator Quran Explorer Facebook Google Translate Twitter Facebook User ID Arabic Keyboard Kalamullah.Com TweeterID

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News & Politics | Yoursay | Liveleakers | Must See | Ukraine | Syria | Entertainment | Browse Channels

Recent Activity

Sorry, no recent_activity items found!

Details for user: dusselkamp

The melancholic humour is protean. It makes me the accelerator of death, the enabler of ends and beginnings. I was made 2 clear away this world ready for renewal. 2 change the order of things.2 cast out the false and enthrone the true. This is my purpose.

Location	United States
Member since	Jun-26-2007
Last activity	Dec-15-2016
Number of friends	42
Total points	1077.16
Number of items	11
Number of items featured	0
Total item views	83014
Number of comments	14756
Comment score	-
Number of subscribers	438
Channels	1

Items in channel 'dusselkamp'

JACKALS OF HAFTAR BRUTAL ANAL RAPE OF WEDDING GUEST

Two Libyan soldiers being trained in Britain raped a man in a Cambridge park after they homed in on their victim "like hunting dogs", a jury has been told. Moktair Ali Saad Mahmoud, 33, and Ibr

By: [dusselkamp](#) | Comments: 42 | Views: 10107 | Votes: 0 | Shared: 16
Location: [Cambridge, England, United Kingdom \(UK/GB\)](#) | Leaked: May-6-2015 in [Other](#)

PREDATORY SODOMITE JACKELS OF GENERAL HAFTAR BRUTALLY RAPE WEDDING GUEST IN ENGLAND JURY TOLD

Two Libyan soldiers being trained in Britain raped a man in a Cambridge park after they homed in on their victim "like hunting dogs", a jury has been told. Moktair Ali Saad Mahmoud, 33, and Ibr

By: [dusselkamp](#) | Comments: 16 | Views: 3841 | Votes: 0 | Shared: 0
Location: [Cambridge, England, United Kingdom \(UK/GB\)](#) | Leaked: May-6-2015 in [Other Middle East](#)

TSA officer faces dismissal over 'get your freak on, girl' note in luggage

By Emanuella Grinberg , CNN updated 3:30 PM EST, Fri October 28, 2011 (CNN) -- An airplane baggage screener faces dismissal for leaving a note in a passenger's bag that said "Get Your Freak On,

By: [dusselkamp](#) | Comments: 27 | Views: 5171 | Votes: 0 | Shared: 0
Location: [United States](#) | Leaked: Oct-30-2011 in [Regional News](#)

Injured Iraq veteran is face of Occupy movement--Returning marine gets his 'reward' from a 'grateful' government--Shameful.

Marine Lance Cpl. Scott Olsen went through 2 tours overseas uninjured, only to be hospitalized by an ungrateful government. Let this be a lesson. march in

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LiveLeak.com - Channel: d... x +

https://www.liveleak.com/c/dusselkamp

liveleak dusselkamp

IP Locator Quran Explorer Facebook Google Translate Twitter Facebook User ID Arabic Keyboard Kalamullah.Com TweeterID

Location: Cambridge, England, United Kingdom (UK/GB) | Leaked: May-6-2015 in Other Middle East

Safe Mode: Off

Member since	Jun-26-2007
Last activity	Dec-15-2016
Number of friends	42
Total points	1077.16
Number of items	11
Number of items featured	0
Total item views	83014
Number of comments	14756
Comment score	-
Number of subscribers	438
Channels	1

[View detailed statistics](#)



dusselkamp

Owner: dusselkamp

Channel creation: Jun-26-2007

Channel views: 30908

Channel items: 11

Last new item: May-7-2015

Channel comments: 1101

Channel subscribers: 438

TSA officer faces dismissal over 'get your freak on, girl' note in luggage

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By: dusselkamp | Comments: 27 | Views: 5171 | Votes: 0 | Shared: 0
Location: United States | Leaked: Oct-30-2011 in Regional News

Injured Iraq veteran is face of Occupy movement--Returning marine gets his 'reward' from a 'grateful' government--Shameful.

Marine Lance Cpl. Scott Olsen went through 2 tours overseas uninjured, only to be hospitalized by an ungrateful government. Let this be a lesson..march in step, follow orders without question like a

By: dusselkamp | Comments: 28 | Views: 5673 | Votes: 0 | Shared: 0
Location: Oakland, California, United States | Leaked: Oct-30-2011 in Politics

KARZAI: AFGHAN BACKS PAKISTAN IF U.S. ATTACKS IT

Afghan President Hamid Karzai has said if the United States and Pakistan ever went to war, his country would back Islamabad, drawing a sharp rebuke Sunday from Afghan lawmakers who claimed the country

By: dusselkamp | Comments: 83 | Views: 5706 | Votes: 3 | Shared: 0
Location: Afghanistan | Leaked: Oct-24-2011 in World News, Afghanistan

Nervous Iraqis buying more assault rifles, pistols

By QASSIM ABDUL-ZAHRA BAGHDAD - Saadoun al-Sahil already had an AK-47 assault rifle at home but just didn't feel safe. The furniture merchant was worried about violence in Baghdad and the impending U

By: dusselkamp | Comments: 23 | Views: 12727 | Votes: 1 | Shared: 12
Location: Iraq | Leaked: Jun-14-2011 in Iraq

Liar Preacher Terry Jones goes back on word and burns quran.

Terry Jones, a preacher for about 30 people in Gainesville, Florida, is really "all burned up". That's right! Yusuf Estes told all of the Christians the real truth

Taskbar: Calendar (APR 28), Firefox, Internet Explorer, Safari, iTunes, iBooks, App Store (6), Mail, Photos (1), WhatsApp, Telegram, etc.

Firefox File Edit View History Bookmarks Tools Window Help

LiveLeak.com - Jordanian ...

https://www.liveleak.com/view?i=617_1422984641

What Is My IP - Th... Quran Explorer Facebook Google Translate Twitter Find my Facebook... Islamic State Time... Arabic Keyboard | ... AbuBaraa Lectures ID from User - Fin... Safe Mode: Off

LiveLeak Create Account | Log in | Home Recent Items Channels Forums Your search entry... Search

News & Politics | Yoursay | Liveleakers | Must See | Ukraine | Syria | Entertainment | Staff Blog | More Blogs | Browse Channels

Jordanian Pilot Burnt to Death in a Cage by ISIS
 Part of channel(s): Syria (current event)

0 0 0
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Item Info Links

Added: Feb-3-2015 Occurred On: Feb-3-2015
 By: MightyMole
 In: Syria

Unnerving Historical Photos That Will Leave you Speechless
 Todays Buzz

GOVERNMENT
 EXHIBIT
 8-501
 1:16-cr-265

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LiveLeak.com - Channel: d... +

https://www.liveleak.com/c/dusselkamp#comment_page=13

Safe Mode: Off

 This should make you happy huh you shitbag. I remember you cheering his capture on http://www.liveleak.com/view?i=617_1422984641
Posted Feb-3-2015 By Em Ali (510.10)

(0) | Report

 @Em Ali  Hmm, now looks like the residents he was dropping bombs on.
Posted Feb-3-2015 By dusselkamp (1075.86)

(0) | Report

 @dusselkamp Just as I knew you really are a da'esh supporting cunt.
Posted Feb-4-2015 By Em Ali (510.10)

(1) | Report

 @Em Ali  Nothing to do with that. It was a horrible death, and hard to watch...but it was exactly what he was doing to people in the buildings from the air. Just as savage to do it with the press of a button, but a lot less honest with how it's viewed. I feel for him regarding his decisions, more so for those close to him, but what's good for the goose is good for the gander. If I was in a U.S. uniform abc gripping bombs on you I couldn't seriously expect that it would protect me in the event your people capture me. **Less..**
Posted Feb-4-2015 By dusselkamp (1075.86)

(1) | Report

 @dusselkamp sure boy.....I see you sucking up to the da'esh fanboys on here, you aren't fooling anyone. As for being caught by "my people".....well believe it or not you would get medical care if needed and then just be imprisoned, possibly be used as a bargaining chip or for exchanges but you wouldn't be tortured in such a manner.
Posted Feb-5-2015 By Em Ali (510.10)

(-2) | Report

Apple Mail Safari Firefox Calendar Photos Music Books App Store System Preferences Mailbox Mailbox Mailbox Trash

Firefox File Edit View History Bookmarks Tools Window Help

LiveLeak.com - Channel: d... x +

https://www.liveleak.com/c/dusselkamp#comment_page=12

What Is My IP - Th... Quran Explorer Facebook Google Translate Twitter Find my Facebook... Islamic State Time... Arabic Keyboard | ... AbuBaraa Lectures ID from User - Fin... >>

Safe Mode: Off

don't go to step two. See step 2. :/
Posted Dec-14-2014 By dusselkamp (1075.86)

(-8) | Report

@dusselkamp♦thats fucked up explanation
 anyway, another one
 "O Prophet, indeed We have made lawful to you your wives to whom you have given their due compensation and those your right hand possesses from what Allah has returned to you [of captives] and the daughters of your paternal uncles and the daughters of your paternal aunts and the daughters of your maternal uncles and the daughters of your maternal aunts who emigrated with you and a believing woman if she gives herself to the Prophet [and] if the Prophet wishes to marry her, [this is] only for you, excluding the [other] believers. We certainly know what We have made obligatory upon them concerning their wives and those their right hands possess, [but this is for you] in order that there will be upon you no discomfort. And ever is Allah Forgiving and Merciful."
 what do you think about this verse as a muslim dusselkamp ? **Less..**
Posted Dec-14-2014 By cloverfield25 (520.90)

(-3) | Report

@cloverfield25♦I accept it. As I do the quran in it's entirety. Disbelieving any part is disbelief. We will agree on some things, but religion is something we will disagree on for now.
Posted Dec-14-2014 By dusselkamp (1075.86)

(-7) | Report

@dusselkamp♦why someone needs religion like this ?
Posted Dec-14-2014 By cloverfield25 (520.90)

(-2) | Report

Taskbar: Safari, VLC, RocketHub, Safari, Mail, Calendar (MAR 7), Firefox, iPhoto, iTunes, iBooks, App Store (7), System Preferences, Mail, WhatsApp, iMessage, Trash

GOVERNMENT
 EXHIBIT
 8-504
 1:16-cr-265



Customer Receipt / Recibo del Cliente

www.westernunion.com

KENSINGTON PHARMACY
3737 UNIVERSITY BLVD W
KENSINGTON MD 20895

Oper ID: BTM Money Transfer Send
10/30/2008 Envio de Dinero
137P EDT MTCN: 673-732-2857

Sender/Remitente: NICHOLAS YOUNG
Receiver/Destinatarario: ZDRAVKO STEFANOV DASKALOV

Available In/Disponible en: BULGARIA USD
Payout amount/Cantidad de pago: 380.00 US US Dollar
Exchange Rate/Tipo de cambio: 1.0000000

Western Union Card Number / Numero de Tarjeta 958006475

Amount/Cantidad: \$ 380.00
Charge(s)/Cargos:
Service/Servicio: 34.00
Total Total: \$ 414.00



NO MORE FORMS - JUST FOR GOLD CARD MEMBERS.

When sending a qualifying money transfer or bill payment to an existing receiver, there is no need to fill out a form, saving even more time.
*** Sign up for your Western Union Prepaid Visa Card and the \$9.95 Activation Fee will be waived. No credit check. Enroll today at www.mycardplace.com/wuvisa3 Valid to: December 31, 2008.

Agent Signature / Firma del Agente _____

Customer Signature / Firma del Cliente _____

IN ADDITION TO THE TRANSFER FEE, WESTERN UNION ALSO MAKES MONEY WHEN IT CHANGES YOUR DOLLARS INTO FOREIGN CURRENCY. PLEASE SEE REVERSE SIDE FOR MORE INFORMATION REGARDING CURRENCY EXCHANGE. IF THE EXCHANGE RATE FOR YOUR TRANSACTION WAS DETERMINED AT THE TIME YOU SENT THE MONEY, THE CURRENCY TO BE PAID OUT AND THE EXCHANGE RATE ARE LISTED ON YOUR RECEIPT. OTHERWISE, THE EXCHANGE RATE WILL BE SET WHEN THE RECEIVER RECEIVES THE FUNDS. CERTAIN TERMS AND CONDITIONS GOVERNING THIS TRANSACTION AND THE SERVICES YOU HAVE SELECTED ARE SET FORTH ON THE REVERSE SIDE. BY SIGNING THIS RECEIPT, YOU ARE AGREEING TO THOSE TERMS AND CONDITIONS.

ADEMÁS DE LOS CARGOS POR EL SERVICIO DE TRANSFERENCIA, WESTERN UNION TAMBIÉN GANA DINERO CUANDO CAMBIA SUS DÓLARES A MONEDA EXTRANJERA. POR FAVOR LEA AL REVERSO MÁS INFORMACIÓN SOBRE EL CAMBIO DE MONEDA. SI EL TIPO DE CAMBIO PARA SU TRANSACCIÓN FUE FIJADO EN EL MOMENTO EN EL QUE ENVIO EL DINERO, LA MONEDA EN LA QUE SE HARA EL PAGO Y EL TIPO DE CAMBIO SE INDICARAN EN EL RECIBO. DE LO CONTRARIO, EL TIPO DE CAMBIO SE FIJARA CUANDO EL DESTINATARIO RECIBA LOS FONDOS. ALGUNOS TERMINOS Y CONDICIONES QUE RIGEN ESTA TRANSACCIÓN Y LOS SERVICIOS QUE USTED HA ELEGIDO SE ESTABLECEN EN LAS AL REVERSO. AL FIRMAR ESTE RECIBO, USTED DECLARA QUE ESTA DE ACUERDO CON ESOS TERMINOS Y CONDICIONES.

SAVE TIME. SAVE MONEY. EARN REWARDS. Just use your Gold Card number once more to activate your Rewards Card. You will earn phone time AND Points to redeem for valuable rewards including fee reductions.



GOVERNMENT EXHIBIT
10-801
1:16-cr-265

Western Union® Gold Card or phone number
Número de Tarjeta Dorada de Western Union® o teléfono

_____ OR (_____) _____

Gold Card Members: Fill out yellow shaded areas only
Titulares de la Tarjeta Dorada: Completar los recuadros amarillos únicamente

Sending Money to/Envío de Dinero a:

USA International (excludes Mexico) Internacional (no incluye a México)

Country/País: BULGARIA

Services/Servicios

Money in Minutes Dinero en Minutos Next Day (where available) Dinero Día Siguiente (según disponibilidad)

1 Receiver Information Información del Destinatario

Dollar Amount^{1,2}/Cantidad en Dólares^{1,2}: \$ 380.00

First Name/Primer Nombre: ZDRAVKO Pateral Last Name/Apellido Paterno: STEFANOV Maternal Last Name/Apellido Materno: DASKALOV

Expected Payout Location (See definition on reverse side)/Lugar de Pago (Ver definición en el reverso): PLVDIV

City/Ciudad: PLVDIV State/Estado: BULGARIA

2 Sender Information Información del Remitente

First Name/Primer Nombre: NICHOLAS Last Name/Apellido Paterno: YOUNG

Phone/Teléfono: (703) 765 4819 Mobile Phone*/Teléfono Celular* (_____)

Email*/Email*: _____

Street/Calle y Número: 11881 HELLBROOK AVE Apt #/Apto: _____

City/Ciudad: FARFAX State/Estado: VA Zip/Código Postal: 22030

3 Additional Services Servicios Adicionales

The following services are available to some destinations for an additional fee/Los siguientes servicios están disponibles para ciertos destinos por un costo adicional:

Send message to Receiver/Enviar este mensaje al Destinatario _____

Call my Receiver when funds are available/Llamar al Destinatario cuando los fondos estén disponibles (_____)

Deliver cash or check/draft to my Receiver/Entregar efectivo o cheque a mi Destinatario _____

Street/Calle y Número: _____ Apt #/Apto: _____

City/Ciudad: _____ State/Estado: _____ Zip/Código Postal: _____

4 Consumer Signature Firma del Cliente

X [Signature]

Agent Use Only
Sólo Para Uso del Agente

Money Transfer Control Number
Número de Control de Envío de Dinero (MTCN)

--	--	--	--	--	--	--	--	--	--

Amount
Cantidad

\$ _____

Transfer Fee
Cargo por el Envío

\$ _____

Other Fee(s)
Otros Cargos

\$ _____

Tax
Impuestos

\$ _____

Total Amount Collected
Cantidad Total

= \$ _____

Exchange Rate¹
Tipo de Cambio¹

Amount to be Paid¹
Cantidad a Pagar¹

Test Question Pregunta de Prueba

If sending under \$1,000, and a U.S. receiver has no identification, you may provide a test question and answer. Si la cantidad enviada es inferior a \$1,000 y el destinatario en EE.UU. no posee un documento de identidad, se podrá proporcionar una pregunta de prueba y su respuesta.

Question (limit 4 words)/Pregunta (un máximo de cuatro palabras) _____ Answer/Respuesta _____

WESTERN UNION

Customer Copy

DFMTOSNDB 04/08

¹ IN ADDITION TO THE TRANSFER FEE, WESTERN UNION ALSO MAKES MONEY WHEN IT CHANGES YOUR DOLLARS INTO FOREIGN CURRENCY. PLEASE SEE ATTACHED PAGES FOR MORE INFORMATION REGARDING CURRENCY EXCHANGE. * IF THE EXCHANGE RATE FOR YOUR TRANSACTION WAS DETERMINED AT THE TIME YOU SENT THE MONEY, THE CURRENCY TO BE PAID OUT AND THE EXCHANGE RATE ARE LISTED ON YOUR RECEIPT. OTHERWISE, THE EXCHANGE RATE WILL BE SET WHEN THE RECEIVER RECEIVES THE FUNDS. * ² When sending \$1,000 or more, the sender must provide identification and additional information. * Certain terms and conditions governing this transaction and the services you have selected are set forth on the attached pages. By signing this receipt, you are agreeing to those terms and conditions.

¹ ADEMÁS DEL CARGO POR EL ENVÍO, WESTERN UNION TAMBIÉN GANA DINERO CUANDO CAMBIA SUS DÓLARES A MONEDA EXTRANJERA. CONSULTE LOS DOCUMENTOS ANEXOS PARA OBTENER MÁS INFORMACIÓN SOBRE EL CAMBIO DE MONEDAS. * CUANDO EL TIPO DE CAMBIO PARA LA TRANSACCIÓN SE HAYA FIJADO AL MOMENTO DE ENVIAR EL DINERO, LA MONEDA DE PAGO Y EL TIPO DE CAMBIO APLICADO SE INDICARÁN EN EL RECIBO DEL CUENTE. EN CASO CONTRARIO, EL TIPO DE CAMBIO SE ESTABLECERÁ CUANDO EL DESTINATARIO COBRE EL DINERO. * ² Para enviar una cantidad mayor o igual a \$1,000, el remitente deberá proporcionar un documento de identidad y otros datos adicionales. * Algunos de los términos y condiciones que rigen la transacción y los servicios escogidos se establecen en los documentos anexos. La firma de este recibo es válida como expresión de consentimiento con tales términos y condiciones.

Date/Fecha _____ Time/Hora _____ Agent's Signature/Firma del Agente _____



Customer Receipt / Recibo del Cliente

www.westernunion.com

SAFEWAY #1431
12200 WEST OX RD
FAIRFAX VA 22033

Oper ID: 799 Money Transfer Send
10/21/2005 Envio de Dinero
432P EDT MTCN: 823-154-2595

Sender/Remitente: NICHOLAS YOUNG
Receiver/Destinataro: ZDRAVKO STEFANOV DASKALOV

Available In/Disponible en: BULGARIA USD
Payout amount/Cantidad de pago: 450.00 US Dollar
Exchange Rate/Tipo de cambio: 1.0000000

Western Union Card Number / Numero de Tarjeta 488557177

Amount/Cantidad: \$ 450.00
Charge(s)/Cargos: Service/Servicio: 43.00
Total/Total: \$ 493.00



WESTERN UNION NEXT DAY SERVICE - FROM \$9.99 FOR TRANSFERS WITHIN THE US!
Why send money by US mail or overnight courier when you can trust Next Day service from Western Union. See Send Form for terms & conditions of service.

YOU'VE BEEN ENROLLED IN THE GOLD CARD REWARDS PROGRAM! Activate the Card by using your Card Number listed above again to begin earning valuable rewards!

Agent Signature / Firma del Agente _____

Customer Signature / Firma del Cliente _____

IN ADDITION TO THE TRANSFER FEE, WESTERN UNION ALSO MAKES MONEY WHEN IT CHANGES YOUR DOLLARS INTO FOREIGN CURRENCY. PLEASE SEE REVERSE SIDE FOR MORE INFORMATION REGARDING CURRENCY EXCHANGE. CERTAIN TERMS AND CONDITIONS GOVERNING THIS TRANSACTION AND THE SERVICES YOU HAVE SELECTED ARE SET FORTH ON THE REVERSE SIDE. BY SIGNING THIS RECEIPT, YOU ARE AGREEING TO THOSE TERMS AND CONDITIONS. IF LISTED ABOVE, THE CURRENCY TO BE PAID OUT AND THE EXCHANGE RATE FOR YOUR TRANSACTION WERE DETERMINED AT THE TIME OF SEND. OTHERWISE, THE EXCHANGE RATE WILL BE SET WHEN THE RECEIVER RECEIVES THE FUNDS. PROTECT YOURSELF FROM CONSUMER FRAUD. BE CAREFUL WHEN A STRANGER ASKS YOU TO SEND MONEY.

ADEMÁS DE LOS CARGOS POR EL SERVICIO DE TRANSFERENCIA, WESTERN UNION TAMBIÉN GANA DINERO CUANDO CAMBIA SUS DÓLARES A MONEDA EXTRANJERA. POR FAVOR LEA AL REVERSO MAS INFORMACION SOBRE EL CAMBIO DE MONEDA. ALGUNOS TERMINOS Y CONDICIONES QUE RIGEN ESTA TRANSACCION Y LOS SERVICIOS QUE USTED HA SELECCIONADO SE ESTABLECEN AL REVERSO. AL FIRMAR ESTE RECIBO USTED ACEPTA DICHOS TERMINOS Y CONDICIONES. SI APARECEN MAS ARRIBA, LA MONEDA DE PAGO Y LA TASA DE CAMBIO DE SU TRANSACCION SE DETERMINARON EN EL MOMENTO DEL ENVIO. SI NO, LA TASA DE CAMBIO SE ESTABLECERÁ CUANDO EL DESTINATARIO RECIBA EL DINERO. PROTEJASE DE LAS ESTAFAS. TENGA CUIDADO CUANDO UN DESCONOCIDO LE PIDA QUE ENVIE DINERO.



To Send Money
Para enviar dinero

WESTERN UNION

Card Members Fill Out Yellow Shaded Area Only / Los tarjetahabientes solamente necesitan llenar el área amarilla.

WESTERN UNION GOLD OR PREFERRED CARD NUMBER

Número de la tarjeta Gold o Preferred de Western Union

AGENT USE ONLY
Sólo para uso del Agente

Additional consumer information on the back of this page.
Información adicional para el cliente al reverso de la hoja.

Money Transfer Control Number
Número de control de transferencia

1 RECEIVER INFORMATION (INFORMACIÓN DEL DESTINATARIO)

Sending Money to/Para enviar dinero a:

USA International (excludes Mexico)

Internacional (no incluye a México)

Country/Nombre del país

Dollar Amount*/Cantidad en dólares*

\$ 450.00

When sending \$1,000 or more, sender must provide identification and additional information.

Al enviar \$1,000 o más, el remitente deberá proporcionar identificación e información adicional.

Receiver Destinatario: ZDRAVKO PASKALOV STEFANOV
First Name/Primer nombre Last Name/Apellido Middle Name/Segundo nombre

Expected Payout Location Destino del pago: PLOVDIV BULGARIA
City/Ciudad State/Estado

2 SENDER INFORMATION (INFORMACIÓN DEL REMITENTE)

Sender's Name Nombre del remitente: NICHOLAS YOUNG
First Name/Primer Nombre Last Name/Apellido

Telephone Teléfono: (703) 467-1215

Address Dirección: 12737 HERON RIDGE DRIVE FAIRFAX VA 22030
Street/Calle y número City/Ciudad State/Estado Zip/Código postal

3 OTHER FEATURES (CARACTERÍSTICAS OPERACIONALES)

If sending less than \$1,000, and your receiver does not have identification, provide Test question and answer. (The maximum amount that can be picked up without I.D. is subject to change without notice).
Si el envío es menor a \$1,000, y el destinatario no tiene ninguna identificación, anote una pregunta clave con la respuesta. (La cantidad máxima que puede ser recogida sin una identificación está sujeta a cambios sin previo aviso).

Question (limit 4 words)/Pregunta clave (límite de 4 palabras): Answer/Respuesta

The following services are available to some destinations, but may incur an additional fee:
Los siguientes servicios están disponibles para ciertos destinos, pero podrían tener un costo adicional:

- Send message with money ()
Envíe esto mensaje con el dinero.
- Call my receiver when funds are available ()
Llame al destinatario cuando los fondos estén disponibles.
- Deliver check/draft to my receiver at: ()
Entregue el cheque/giro al destinatario en:

Address Dirección

CONSUMER SIGNATURE FIRMA DEL CLIENTE

X [Signature]

Date Fecha	Time Hora
Amount Cantidad	\$
Transfer Fee Cargo por la transferencia	\$
Message Fee Cargo por el mensaje	\$
Telephone or Delivery Fee Cargo por llamada telefónica o entrega a domicilio	\$
Tax Impuesto	\$
Total Amount Collected Cantidad total cobrada	\$
Rate of Exchange* Tipo de cambio*	Amount to be Paid* Cantidad a pagar*

*IN ADDITION TO THE TRANSFER FEE, WESTERN UNION ALSO MAKES MONEY WHEN IT CHANGES YOUR DOLLARS INTO FOREIGN CURRENCY. PLEASE SEE ATTACHED PAGES FOR MORE INFORMATION REGARDING CURRENCY EXCHANGE. ♦ IF THE EXCHANGE RATE FOR YOUR TRANSACTION WAS DETERMINED AT THE TIME YOU SENT THE MONEY, THE CURRENCY TO BE PAID OUT AND THE EXCHANGE RATE ARE LISTED ON YOUR RECEIPT. OTHERWISE, THE EXCHANGE RATE WILL BE SET WHEN THE RECEIVER RECEIVES THE FUNDS. ♦ CERTAIN TERMS AND CONDITIONS GOVERNING THIS TRANSACTION AND THE SERVICES YOU HAVE SELECTED ARE SET FORTH ON THE ATTACHED PAGES. BY SIGNING THIS RECEIPT, YOU ARE AGREEING TO THOSE TERMS AND CONDITIONS.

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DFMTOSNDB (05/05)

WESTERN UNION Customer Receipt / Recibo del Cliente www.westernunion.com

SAFEWAY #1431 Oper ID: 486 Money Transfer Send
 12200 WEST OX RD 08/15/2013 Envio de Dinero
 AT FAIRFAX TOWN CENTER 834P EDT MTCN: 721-041-3170
 FAIRFAX VA 22033
 Sender/Remitente: SIMON BELMONT
 Receiver/Destinataria: ZDRAVKO STEFFANOV DASKALOV

Available In/Disponible en: BULGARIA USD
 Payout amount/Cantidad de pago: 812.00 US US Dollar
 Exchange Rate/Tipo de cambio: 1.0000000

Western Union Card Number / Numero de Tarjeta 941873576 : 31
 Total WU Card Points/Total puntos en tarjeta WU : 31
 Assigned WU Card Points/Puntos asignados a la tarjeta WU : 31

Amount/Cantidad:	\$ 812.00
Charge(s)/Cargos:	62.00
Service/Servicio:	\$ 874.00
Total/Total:	

We value your opinion!
 Go to westernunion.com/listens to tell us about our service.
 Survey code: 7210413170
 *** Upgrade to the NEW Reloadable Western Union Gold Card Visa Prepaid Card!
 Free to upgrade and NO monthly maint. or purchase transaction fees. Sign up
 today at mygoldcarddebit.com - No bank account or credit check required.

Agent Signature / Firma del Agente _____ Customer Signature / Firma del Cliente _____

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 AL FIRMAR ESTE RECIBO, USTED ESTÁ DE ACUERDO CON LOS TÉRMINOS Y CONDICIONES QUE SE ENCUENTRAN EN EL REVERSO DE ESTE RECIBO.

GOVERNMENT EXHIBIT 10-803 1:16-cr-265

MSN Home | My MSN | Hotmail | Shopping | Money | People & Chat

Sign Out

Web Search:

**SAVE \$50
ON DINNER!**

APPLEBEE'S, CRACKER BARREL,
OLIVE GARDEN, RED LOBSTER
[Click here to REDEEM!](#)



Hotmail

Today

Mail

Calendar

Contacts

flyingdutchman1979@hotmail.com

Free Newsletters | 1

| | | | | | | |

From : Zdravko Builder <zdravkobuilder@yahoo.com> | | |

Sent : Wednesday, May 12, 2004 7:44 PM

To : Rudolph Van Waldron
<flyingdutchman1979@hotmail.com>

Subject : RE:

Hi
no problem in changing the order before it's paid. The subtotal will be \$1344+\$90 for 3 packages=\$1434 total. Thank you for the offer, I'll keep it in mind and if I need something will let you know. The second package must arrive this week, it takes much time already...

> Hello,
> There is going to be a slight change on our
> next order. The new order
> is as follows...
>
> Nolvadex (tamoxifen citrate) (bulgaria) (10mg) 690
> tabs = \$230
> Dianabol (Balkanpharma) (bulgaria) (5mg) 1000
> tabs = \$450
> Clomid (EGIS) (Hungary) (50mg)
> 500 tabs = \$800
> Xanax (alpraxolam) (Pharmacia&Upjohn) (.5mg) 40 tabs =
> \$64
>
> subtotal=
> \$1544
> Just let me know how many packages it will be and
> what the total is and if
> changing the order at this point will be a problem
> for you. Will be able to
> Western Union you the money early next week and will
> let you know when the
> funds are sent.
>
> If there is anything you want from the USA,
> pharmaceuticals or otherwise
> (clothes, merchandise, ect.) that are more available
> to us here than in your
> country just ask and we will let you know if we can
> get it or not for you.
> Will keep you updated when we get the second
> package.
> Thanks again
>

FriendFinder.com
Discover great Singles near you

I am a

seeking a

for

Join Now FREE!
Over 3 million members

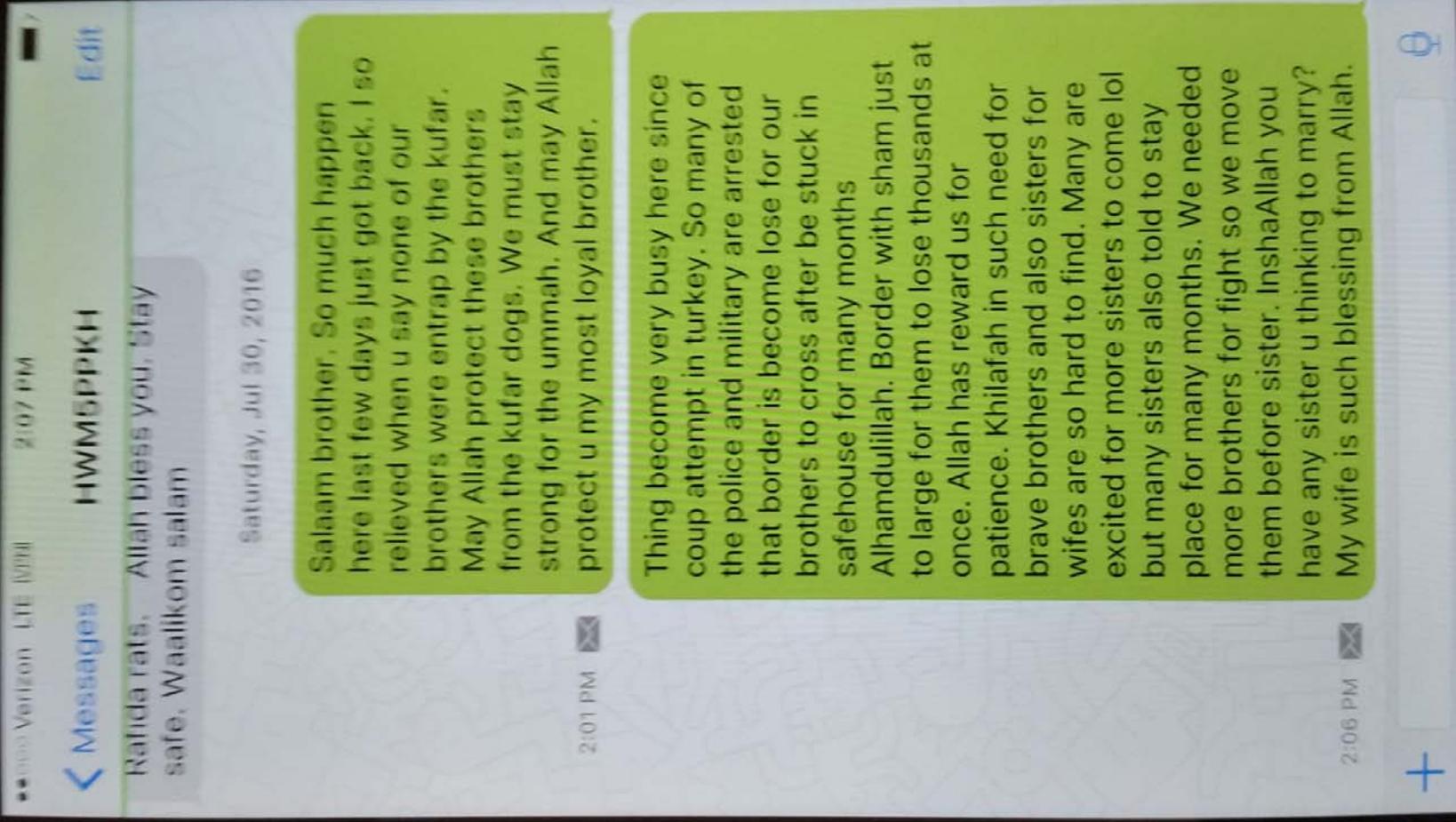
**GOVERNMENT
EXHIBIT
10-804
1:16-cr-265**

http://by13fd.bay13.hotmail.msn.com/cgi-bin/getmsg?msg=MSG1084405468.6&start=17079:... 5/13/04

QWF 290

- All Songs
- ISIS Techno Remix (All**
Unknown Artist
- ISIS nasheed Life of hu**
Unknown Artist
- Jihad Nasheed - Be Lik**
Unknown Artist
- Jihad Nasheed - Rise O**
Unknown Artist
- Jihad Nasheed COME (**
Unknown Artist
- THE LIONS OF GOD - N**
Unknown Artist
- Qawlu sawarim - Nashe**
Unknown Artist

GOVERNMENT
EXHIBIT
2-123
1:16-cr-265



Verizon LTE (M) 2:07 PM

Messages

HWM5PPKH

Edit

Rafida rats, Allah bless you, Stay safe, Waalikom salam

Saturday, Jul 30, 2016

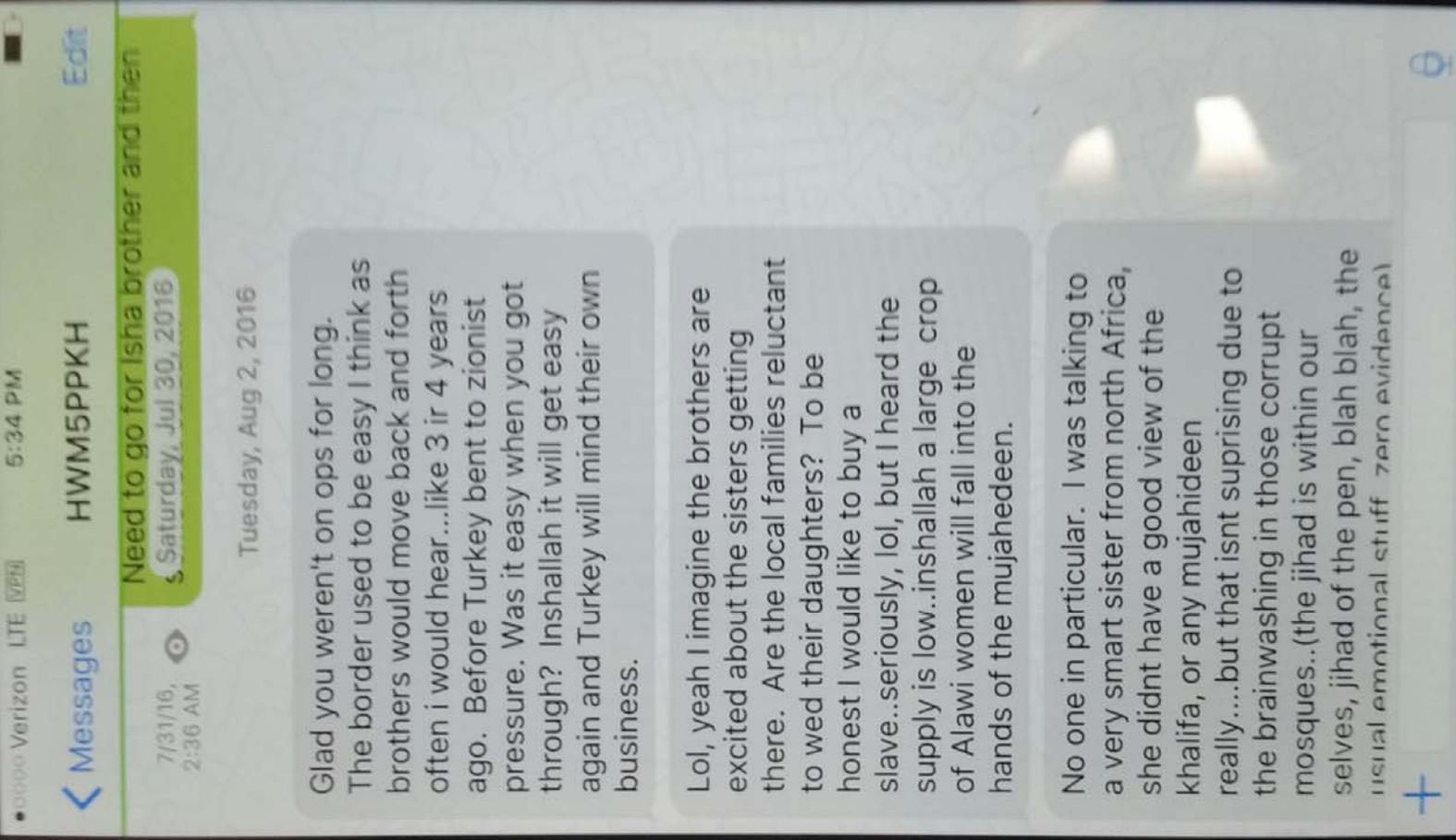
Salaam brother, So much happen here last few days just got back, I so relieved when u say none of our brothers were entrap by the kufar. May Allah protect these brothers from the kufar dogs. We must stay strong for the ummah. And may Allah protect u my most loyal brother.

2:01 PM

Thing become very busy here since coup attempt in turkey. So many of the police and military are arrested that border is become lose for our brothers to cross after be stuck in safehouse for many months Alhamdulillah. Border with sham just to large for them to lose thousands at once. Allah has reward us for patience. Khilafah in such need for brave brothers and also sisters for wives are so hard to find. Many are excited for more sisters to come lol but many sisters also told to stay place for many months. We needed more brothers for fight so we move them before sister. InshaAllah you have any sister u thinking to marry? My wife is such blessing from Allah.

2:06 PM





Verizon LTE 5:34 PM

Messages HWM5PPKH Edit

Need to go for Isha brother and then Saturday, Jul 30, 2016

7/31/16, 2:36 AM

Tuesday, Aug 2, 2016

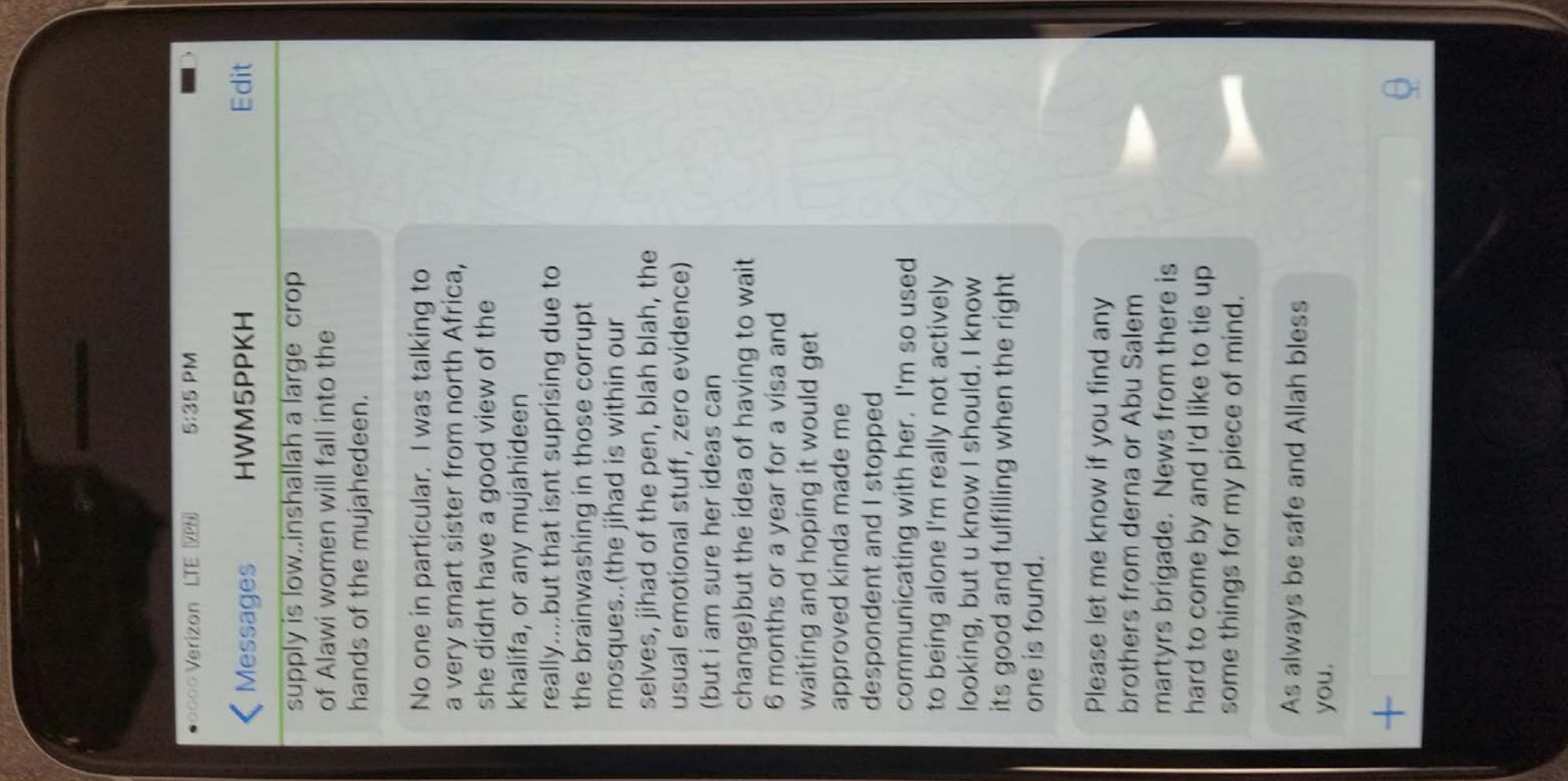
Glad you weren't on ops for long. The border used to be easy I think as brothers would move back and forth often i would hear...like 3 ir 4 years ago. Before Turkey bent to zionist pressure. Was it easy when you got through? Inshallah it will get easy again and Turkey will mind their own business.

Lol, yeah I imagine the brothers are excited about the sisters getting there. Are the local families reluctant to wed their daughters? To be honest I would like to buy a slave..seriously, lol, but I heard the supply is low..inshallah a large crop of Alawi women will fall into the hands of the mujahedeen.

No one in particular. I was talking to a very smart sister from north Africa, she didnt have a good view of the khalifa, or any mujahideen really....but that isnt suprising due to the brainwashing in those corrupt mosques..(the jihad is within our selves, jihad of the pen, blah blah, the usual emotional stuff zero evidence)

+

GOVERNMENT
EXHIBIT
2-126
1:16-cr-265



Verizon LTE [VPH] 5:35 PM

Messages HWM5PPKH Edit

supply is low..inshallah a large crop of Alawi women will fall into the hands of the mujahedeen.

No one in particular. I was talking to a very smart sister from north Africa, she didnt have a good view of the khalifa, or any mujahideen really....but that isnt suprising due to the brainwashing in those corrupt mosques..(the jihad is within our selves, jihad of the pen, blah blah, the usual emotional stuff, zero evidence) (but i am sure her ideas can change)but the idea of having to wait 6 months or a year for a visa and waiting and hoping it would get approved kinda made me despondent and I stopped communicating with her. I'm so used to being alone I'm really not actively looking, but u know I should. I know its good and fulfilling when the right one is found.

Please let me know if you find any brothers from derna or Abu Salem martyrs brigade. News from there is hard to come by and I'd like to tie up some things for my piece of mind.

As always be safe and Allah bless you.

+ [input field] [send icon]