



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 MAHMOUD YOUSSEF KOURANI,

Defendant.

03-81030

CRIMINAL NO.

HON. **ROBERT H. CLELAND**

VIO. 18 U.S.C. § 2339B

MAGISTRATE JUDGE R. STEVEN WHALEN

INDICTMENT

THE GRAND JURY CHARGES:

General Allegations

1. Pursuant to the Anti-Terrorism and Effective Death Penalty Act, the United States Secretary of State is empowered to designate groups as "foreign terrorist organizations." 8 U.S.C. § 1189(a)(1). An entity may be designated as a foreign terrorist organization if the Secretary finds that: (1) the organization is a foreign organization; (B) the organization engages in terrorist activity; and (C) the terrorist activity of the organization threatens the security of United States nationals or the national security of the United States. Effective October 8, 1997, the Secretary of State designated as a foreign terrorist organization Hizballah, also known as "Party of God," also known as "Islamic Jihad," also known as "Islamic Jihad Organization,"

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also known as "Revolutionary Justice Organization," also known as "Organization of the Oppressed on Earth," also known as "Islamic Jihad for the Liberation of Palestine," also known as "Organization of Right Against Wrong," also known as "Ansar Allah," also known as "Followers of the Prophet Muhammad."

2. Hizballah is a world-wide terrorist network which serves as an organization that advocates for the empowerment of Shiite Muslims. Hizballah supports the model of the Iranian Islamic Republic and promotes the realization of this form of government worldwide. Its ideological basis derives from the Islamic fundamentalism expressed by the Ayatollah Khomeini of Iran. Hizballah's goals include the eradication of "western imperialism" from the Middle East represented in part by the United States ("the Great Satan") and Israel ("the little Satan"). Hizballah has conducted numerous high profile terrorist attacks including the abduction, torture, and murder of U.S. Marine Corps Lieutenant Colonel William R. Higgins from February 17, 1988 through July 1989.

3. At all times material to this indictment, MAHMOUD YOUSSEF KOURANI was a member, fighter, recruiter and fund raiser for Hizballah. Operating at first from Lebanon and later in the United States, KOURANI was a dedicated member of Hizballah who received specialized training in radical Shiite fundamentalism, weaponry, spy craft, and counterintelligence in Lebanon and Iran.

KOURANI also recruited others within Lebanon to become members of Hizballah, overseeing their applications and detailed background checks. Among other duties, KOURANI held the position of fund raising solicitor for Hizballah in the vicinity of Tyre, Lebanon.

4. KOURANI surreptitiously entered the country via the U.S./Mexico border on or about February 4, 2001, took up residence in the Dearborn, Michigan area, and continued his allegiance and support of Hizballah. KOURANI's activities within the United States were overseen by his brother, an unindicted co-conspirator, who at all times material to this indictment was the Hizballah Chief of Military Security for Southern Lebanon. While in the United States, KOURANI employed "taqiyah," a Shia Muslim doctrine of concealment, pretense and fraud. This meant among other things that KOURANI would, when he thought it necessary, avoid going to mosques, not attend Shiite religious rituals, shave his beard, and otherwise keep his true beliefs secret while inside what he considered to be hostile territory – the United States of America.


COUNT ONE: (Conspiring to Provide Material Support to a Foreign Terrorist Organization – 18 U.S.C. §§ 2339B)

D-1 MAHMOUD YOUSSEF KOURANI

1. The general allegations are hereby re-alleged and incorporated herein by reference.

2. From on or about October 8, 1997 through on or about May 3, 2003, within the Eastern District of Michigan, Southern Division, and elsewhere, MAHMOUD YOUSSEF KOURANI, knowingly conspired and agreed with others both known and unknown to the Grand Jury to knowingly provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), to Hizballah, which had previously been designated by the United States Secretary of State as a foreign terrorist organization under Title 8, United States Code, Section 1189(a)(1); all in violation of Title 18, United States Code, Section 2339B.

THIS IS A TRUE BILL.


FOREPERSON

Dated: 11/19/03

JEFFREY G. COLLINS
United States Attorney



KENNETH R. CHADWELL
Assistant United States Attorney