

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case NO. 16-mj-30039

v.

KHALIL ABU RAYYAN,

Defendant.

**AFFIDAVIT OF RAYYAN ABO-RAYYAN AND
PROPOSED AGREEMENT TO ASSUME CUSTODY OF THE
DEFENDANT**

STATE OF MICHIGAN)
) SS
COUNTY OF OAKLAND)

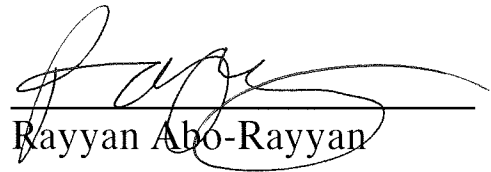
I, Rayyan Abo-Rayyan, make the following statement under penalty of perjury:

1. I am the father of the defendant, Khalil Abu Rayyan, in the above-captioned case number.
2. I am a United States citizen and an engineer with A123 Systems in Livonia, Michigan. I also own and operate Ray's Pizza, at [REDACTED] Telegraph Rd., Detroit, Michigan 48219.

3. In 1999, I obtained a bachelor's degree in Mechanical Engineering from Wayne State University. In 2001, I obtained a Master's Degree in Engineering from Wayne State. In 2013, I obtained a Certificate in Defense & Manufacturing from Lawrence Tech University. In 2014, I obtained a Master's Degree in Industrial and Systems Engineering from Lawrence Tech University.
4. The Complaint against my son, dated February 4, 2016, states in ¶23 that Khalil told an undercover agent: "I tried to shoot up a church one day. I don't know the name of it, but it's close to my job. It's one of the biggest ones in Detroit. Ya, I had it planned out. I bought a bunch of bullets. I practiced a lot with it. I practiced reloading and unloading. But my dad searched my car one day and he found everything. He found the gun and the bullets and a mask I was going to wear." 16-mj-30039, Doc #1, Pg ID 6.
5. In response to ¶23 of the Complaint, I state under oath and penalty of perjury that I have **never** found - in any of the cars/trucks that Khalil drives - any gun of any kind; any AK-47, or any other assault rifle; any ammunition of any sort; or any mask of any sort.
6. I have, however, found and confiscated small amounts of marijuana from Khalil's car.
7. I agree to assume custody of the defendant and to supervise him in accordance with this Court's bond order, whatever the conditions, no matter how stringent. I also agree to use every effort to assure the appearance of the defendant at all scheduled hearings in Court. I also agree to notify the Pretrial Services Agency [Telephone Number: (313) 234-5300] immediately if the defendant violates any condition of his or her release, or if the defendant decides to

flee, or if the defendant disappears. I also agree to permit the defendant to reside in my home until the case is over or as directed by my supervising officer.

8. I understand that I cannot be forced to assume these obligations. I have assumed these obligations voluntarily. I agree to notify the Pretrial Services Agency if at any time for any reason I am no longer able to comply with this agreement. I understand and agree that it is in the defendant's best interest to appear in Court as required and to comply with the conditions of his or her bond. I have received a copy of this agreement, and a copy of this Court's bond order.

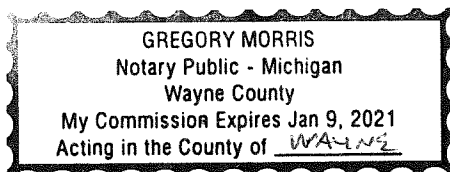

Rayyan Abo-Rayyan

Subscribed and sworn to before me
This 11th day of February 2016


Notary Public

In and For Wayne County, MI

My commission expires: 1-9-2021



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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 16-mj-30039

Unassigned

KHALIL ABU-RAYYAN,

Defendant.

_____ /

CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2016, I electronically filed the foregoing Affidavit of Rayyan Abo-Rayyan and Proposed Agreement to Assume Custody of the Defendant with the Clerk of the Court using the ECF system, which will send notification of the filing to the following:

Ronald W. Waterstreet
Assistant U.S. Attorney
211 W. Fort Street, Suite 2001
Detroit, Michigan 48226
Ronald.Waterstreet@usdoj.gov

/s Todd A. Shanker
Todd_Shanker@fd.org
Deputy Federal Defender
Federal Defender Office