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July 6, 1995

AUSA Andrew C. McCarthy
Office of the United States Attorney
The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, N.Y. 10007

Re: U.S. v. Abdel Rahman, et al.
Rule 16, Notice

Dear Mr. McCarthy,

This letter is submitted to supplement our notice pursuant to Rule 16(b) previously served on June 16, 1995.

Vincent Cannistraro will testify that Dr. Abdel Rahman is known to be an Islamic fundamentalist cleric with ties to al Gama'a al Islamaya in Egypt. He will state that for approximately 25-30 years, the Dr. has been solely focused and worked for bringing an Islamic government to Egypt by any means necessary. He will testify that the United States government which gives more than three billion dollars annually to the Mubarak regime, making it the second largest recipient of U.S. foreign aid, is adamantly opposed to such change. Notwithstanding the above, in Mr. Cannistraro's expert opinion, Dr. Abdel Rahman has never been viewed as a threat to the institutions or the U.S. government within U.S. boundaries and further, any such focus would be contrary to and dilute Dr. Abdel Rahman's Egyptian agenda.

Mr. Cannistraro will further testify about U.S. government financial support of Afghan Mujahideen forces fighting the Soviets in their homeland. This support took the form of weapons and money administered by the Pakistani authorities.

He will state his opinion that terrorism is a state sponsored enterprise now also seen as carried out by well financed and passionate advocates of a cause. However, the organization of a terrorist cell, regardless of its nexus, in his opinion, must have funding, expertise and discipline. When undertaking a terrorist action, there is a preliminary stage when goals and targets are first discussed and their surveillance undertaken and there are contingency escape plans formulated for all cell members for after carrying out an action. In his opinion, the cell members who masterminded and undertook the



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World Trade Center bombing, met these criteria, with the exception of contingency escape plans for all its members. The activities of the defendants ~~_____~~ as known to him, ~~_____~~ do not meet the criteria, ~~_____~~ of a terrorist cell.

Mr. Cannistraro will testify that he has knowledge, derived from his official capacity with the Central Intelligence Agency that the Egyptian government sent a delegation to the U.S. State Department to discuss the ongoing role of Emad Salem in Egyptian intelligence operations.

Finally, Mr. Cannistraro will testify on the "Jihad organization" as alleged in the indictment. He will state that in his professional opinion there is no information to support the contention of an international Jihad organization under the direction of Dr. Omar Abdel Rahman and that there are a number of nationally diverse [Iran, Algeria, Sudan, Palestine, Jordan, Egypt, etc.] based groups with shared goals and outlooks but no single hierarchy or organizational head.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynne F. Stewart".

Lynne F. Stewart

cc: Hon. Michael M. Mukasey