

EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 01-80778

-vs-

HON. GERALD E. ROSEN

D-1 KARIM KOUBRITI,

OFFENSES:

D-2 AHMED HANNAN,

D-3 YOUSSEF HMIMSSA, a/k/a
PATRICK J. VUILLAUME, a/k/a
MICHAEL SAISA, a/k/a
JALALI,

Count 1: Providing Material Support or
Resources to Terrorists
18 U.S.C. § 2339A

D-4 ABDELLA LNU,
a/k/a JEAN PIERRE TARDELLI,
a/k/a GEORGE LABIBE,
a/k/a HUSSEIN MOHSEN SAFIDDINE,
a/k/a NABIL HAYAMM, and

Count 2: Conspiracy to Engage in Fraud
and Misuse of Visas, Permits
and other Documents
18 U.S.C. § 371

D-5 FAROUK ALI-HAIMOUD,
a/k/a "Khalid,"

Count 3: Fraud and Misuse of Visas,
Permits and Other Documents
18 U.S.C. §§ 1546 (a) and 2

Defendants.

Count 4: Fraud and Related Activity
in Connection with Identifi-
cation Documents and
Information
18 U.S.C. §§ 1028 (a) (6) and 2

SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
**(18 U.S.C. § 2339A -- Providing Material Support
or Resources to Terrorists)**

- D-1 KARIM KOUBRITI
D-2 AHMED HANNAN
D-4 ABDELLA LNU,
a/k/a JEAN PIERRE TARDELLI,
a/k/a GEORGE LABIBE,
a/k/a HUSSEIN MOHSEN SAFIDDINE,
a/k/a NABIL HAYAMM, and
D-5 FAROUK ALI-HAIMOUD,
a/k/a “Khalid”

INTRODUCTION

1. In the 1990s, a loose, transnational network of radical Islamists launched an international holy war, or *global jihad*, in an effort to, among other things, drive American military forces from the Arabian peninsula, erode American support of Israel, and undermine American support to moderate regimes throughout the Middle East that they viewed as insufficiently Islamic. It was at this time, that elements of this radical Islamic network established intelligence collection cells in the United States to plan and support future terrorist acts, both within the United States and abroad.

A. Salafiyya

2. This network is heavily influenced by a factional Islamic religious movement called the Salafiyya -- a name derived from *al-Salaf al-Salih*, “the venerable forefathers” (or true path), which refers to the generation of the Prophet Muhammad and his contemporaries. This movement, along with the Wahabis and Takfiris, forms the

hardcore element of what is identified today as Sunni Islamic Fundamentalism. Wahabis, Takfiris, and Salafists promote the establishment of an Islamic state under the *Sharia*, that is, strict Islamic law, that is ruled by a Caliph. These groups regard the Islam that most Muslims practice today as unpure and polluted by idolatry and Western influence.

Salafists seek to reform Islam by specifically emulating the first generation of Muslims since, according to these Salafists, later generations of Muslims have been corrupted by several centuries of religious practices and Western influences introduced by errant Muslims. Salafists reject any behavior that was not specifically supported or enjoined by the Prophet Mohammed. In almost every Sunni Muslim country, the Salafists have spawned radical fundamentalist-Islamic political movements, the goal of which is to compel the state to apply the *Sharia*. Many Salifists believe that the strict application of the *Sharia* is necessary to ensure that Muslims walk the true path of the Prophet. These radical fundamentalist-Islamic groups see the world divided in two spheres; that is, *Dar-al-Islam* (House of Islam or Islamic Zone), where peace reigns (*Sallam*), and the *Dar-al-Harb* (House of War or War Zone), which prevents a true Islamic state. The latter is viewed by these radical fundamentalist-Islamic groups to include all “infidel” areas that must ultimately be conquered. *Global jihad* is the constant effort to achieve this goal. The *global jihad* against *Dar-al-Harb* is not exclusively directed towards the outside world, but also against perceived internal threats, such as any non-Muslim presence in *Dar-al-Islam*.

B. Al Takfir Wal Hijira

3. Among the global jihadist factions existing worldwide, *Al Takfir Wal Hijira* (“excommunication and emigration”) or (anathema and exile) is among the most radical and extremist in ideology and methodology. Followers of this extremist ideology are called Takfiris. Takfiris believe that true Muslims must depose, or excommunicate unnatural or false rulers and can do so only through active struggle. Takfiris take their beliefs out of the realm of contemplation and into the realm of action. Takfiri cells are trained to blend into Western societies, which they view as “kufar” (atheist, corrupt, or infidel) in order to plot terrorist attacks against those “corrupt” societies. Members of Takfiri cells may live together, not pray or attend Mosque, partake in alcohol and narcotics, and dress to assimilate and integrate into the communities they live in an attempt to avoid suspicion and/or detection.

C. Jihad

4. Salafists and Takfiris place greatest emphasis on *jihad*, or what they perceive as holy war. The Prophet Muhammad fought in mortal combat against his enemies in Arabia, and Salafists and Takfiris place great emphasis on this aspect of the Prophet’s life. Salafists, Takfiris, and other Jihadists view the Islamic military campaigns which conquered the Middle East and North Africa in the Seventh Century as righteous, and draw their call for violence from these historical events. The Soviet invasion of Afghanistan in 1979 drew Salafists and Takfiris who were encouraged to engage in *jihad*

as an essential element of their religious duty. A coalition of radicals, to include ultra-extremists returning from Afghanistan, formed organizations such as the Harakat ul-Ansar, Al-Gama'a Al-Islamiyya (the Islamic Group) in Egypt and the Armed Islamic Group (GIA) in Algeria. A former GIA commander formed an organization called the "Salafi Group for Call and Combat," which received financial support from Usama Bin Laden and became part of the loose network he had formed.

5. In February 1998, the "World Front for Jihad Against Jews and Crusaders," led by Usama Bin Laden and which included the Salafi Group for Call and Combat, issued a *Fatwa* (a religious edict) "against Jews and Crusaders" (infidels) which described the duty of every individual Muslim, in any country in which it is possible, to kill Americans and their allies, both civilians and military, in order to purge the infidels from the lands of Islam (*Dar-al-Islam*), and to fight them "until there is no more tumult or oppression, and there prevails justice and faith in God."

6. On August 28, 1998, while in U.S. Federal Prison for his role in the first World Trade Center attack in 1993, Sheik Abdul Rahman issued a *Fatwa*, mirroring the call for attacks on American civilian targets:

Cut all links with their country (United States). Destroy them thoroughly and erase them from the face of the earth. Ruin their economies, set their companies on fire, turn their conspiracies to powder and dust. Sink their ships, bring their planes down. Slay them in the air, on land, on water. And (with the Command of Allah) kill them wherever you find them. Catch them and put them in prison. Lie in wait for them and kill these infidels. They will surely get great

oppression from you. God will make you the means of wreaking a terrible revenge upon them, of degrading them. He will support you against them. He will cure the afflicted hearts of the faithful and take all anger out of their hearts.

7. Since 1998, this World Front for Jihad Against Jews and Crusaders engaged

in *global jihad* warfare against many countries, including the United States. The Salafists and Takfiris are one arm of the greater global Jihadist organization known as “Al-Qaeda.”

THE OFFENSES

8. That from in or about February 1998, and continuing to the time of this indictment, said dates being approximate, in the Eastern District of Michigan and elsewhere, Defendants, KARIM KOUBRITI, AHMED HANNAN, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” with each other and with others known and unknown to the Grand Jury, did combine, conspire, confederate and agree to provide material support and resources, knowing and intending that such material support and resources were to be used in preparation for, and in carrying out of:

(a) conspiracy within the United States to damage or destroy specific property situated within a foreign country with which the United States is at peace; in violation of Title 18, United States Code, Section 956(b); and

(b) conduct transcending national boundaries, acts that create a substantial risk of serious bodily injury to any other person, by conspiring to destroy and damage structures, conveyances, and other real and personal property within the United States, in violation of Title 18, United States Code, Section 2332a;

All in violation of Title 18, United States Code, Section 2339A.

OBJECT OF THE CONSPIRACY

9. The Defendants, KARIM KOUBRITI, AHMED HANNAN, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, and FAROUK ALI-HAIMOUD, a/k/a "Khalid," operated as a covert underground support unit for terrorist attacks within and outside the United States, as well as a "sleeper" operational combat cell. The object of the conspiracy was, among other things, to cause economic harm to U.S. businesses, to provide personnel, indoctrination, recruitment and training, safe houses, mail drops, intelligence target data collection, weapons, false documentation and identification, and assistance and other covert support for the purpose of engaging in violent attacks against

persons and buildings within the territory of Jordan, Turkey, and the United States.

MANNER AND MEANS OF THE CONSPIRACY

10. In furtherance of said unlawful conspiracy, and attempting to achieve the objective thereof, the Defendants, KARIM KOUBRITI, AHMED HANNAN, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” performed, among other things, the following manner and means:

(a) Beginning on an unknown date, the Defendants, KARIM KOUBRITI, AHMED HANNAN, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” and with others known and unknown to the Grand Jury, formed an agreement to covertly provide a variety of services and tangible items to individuals, to whom they referred to as “the brothers” (Ikhwan), in order to assist these individuals’ engagement in and promotion of violent attacks around the world. The Defendants, KARIM KOUBRITI, AHMED HANNAN, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” thereafter performed such services and took steps to acquire such items,

which they intended to use to engage in or support holy war, or *global jihad*.

(b) The Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” resided together in apartments in Michigan and in particular, Detroit and Dearborn, and received direction from Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, who resided in Chicago, Illinois, and was known by them to have expertise in, among other things, airport security operations, the fraudulent use of telephone calling calls, and the manufacturing and acquisition of false identification.

(c) The Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” were instructed by Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, to use a coded form of communication, for use in speaking to each other about their plans. Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, received funds and consulted with “brothers” he had in place throughout Europe.

(d) In June, 2001, an individual moved into an apartment at [REDACTED]

██████████, Dearborn, Michigan, with Defendants, KARIM KOUBRITI and AHMED HANNAN, where Defendant, FAROUK ALI-HAIMOUD, a/k/a “Khalid,” was a frequent visitor. Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” attempted to recruit this individual to participate in *global jihad* against states that were not sufficiently Islamic, such as the Hashemite Kingdom of Jordan, Turkey, and the United States. It was the plan of the Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” to illicit the other individual’s assistance in bringing like-minded “brothers” into the United States by creating false documentation to facilitate their illegal entry into the United States and travel abroad.

(e) The Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” were involved in plans to obtain weaponry to benefit operatives overseas, to recruit persons for violent activity, to arrange for the entry of recruits into the United States where they would be trained for *global jihad*, and to arrange false identification to facilitate such entry and training. Their planning involved specific violent attacks, including ones that targeted an American airbase in Incerlik, Turkey, and a hospital in Amman, Jordan. These locations were depicted in a day planner, which was found in the apartment of Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” on September 17, 2001, along with Salafist audio tapes and a video tape that appears to depict surveillance

of such U.S. landmarks as Disneyland in Anaheim, California, and the MGM Grand Hotel and Casino in Las Vegas, Nevada.

(f) The Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” at times traveled to Detroit Metropolitan Airport, where they attempted to locate security breaches that would allow them to, among other things, directly access airliners. From on or about May 16, 2001, to on or about July 6, 2001, Defendants, KARIM KOUBRITI and AHMED HANNAN, were employed by a vendor at Detroit Metropolitan Airport; and from or about February 15, 2002 to April 3, 2002, Defendant, FAROUK ALI-HAIMOUD, a/k/a “Khalid,” was employed by a vendor at Detroit Metropolitan Airport.

(g) The Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” took steps and measures to disguise their plans and purposes. For example, in an attempt to avoid the risk that written records of their planning would be attributed to them, they located a mentally unstable man who, in exchange for certain favors, agreed to sign his name and provide personal information on certain handwritten pages in notebooks that contained various plans and sketches of an American airbase in Incerlik, Turkey, and a hospital in Amman, Jordan, and to temporarily hold on to these notebooks.

(h) On or about July 1, 2001, an individual moved out of [REDACTED]

[REDACTED],

Dearborn, Michigan, to an apartment on [REDACTED] in Dearborn, Michigan. Defendant,

FAROUK ALI-HAIMOUD, a/k/a “Khalid,” then moved into [REDACTED], Dearborn, Michigan, with Defendants, KARIM KOUBRITI and AHMED HANNAN.

(i) Following his departure from the apartment, this individual remained in contact with the Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, and used a stolen credit card number to obtain computer equipment that enabled him to prepare fraudulent identification for Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, and others.

(j) In or about July, 2001, an individual’s apartment on [REDACTED] in Dearborn was burglarized and the false documentation he was in the process of preparing was stolen. Shortly thereafter, Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, notified the individual that the false documentation was in the possession of Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a “Khalid.” Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, then brokered a payment to Defendant, KARIM KOUBRITI and

AHMED HANNAN, from a third party for whom the individual had prepared false identification in return for the falsified documents.

OVERT ACTS

11. In or about February 1998, a radical Islamic fundamentalist network controlled by Al-Qaeda, issued a *Fatwa* targeting American civilians. In a signed statement calling for attacks on American targets, the *Fatwa* “declared war” on the United States and the United Kingdom, stating, “The Fatwa is Jihad against the U.S. and British governments, armies, interests, airports and institutions.” In addition, the *Fatwa* stated that, “The only Islamic Fatwa against this explicit aggression is Jihad.”

12. On or about February 23, 1998, Usama Bin Laden issued a statement, "In compliance with God's order, . . . we issue the following Fatwa to all Muslims to kill the Americans." On or about August 7, 1998, the U.S. Embassies in Nairobi, Kenya, and Dar Es Salaam, Tanzania, were bombed.

13. On or about August 28, 1998, a *Fatwa* was issued by Sheik Abdul Rahman, that called for attacks on American civilian targets.

14. The Defendant, KARIM KOUBRITI, was born in Morocco and entered the United States through New York in October 2000.

15. The Defendant, AHMED HANNAN, was born in Morocco and entered the

United States through New York City in November 2000.

16. The Defendant, FAROUK ALI-HAIMOUD, a/k/a “Khalid,” was born in Algeria and entered the United States through Chicago in November 1999.

17. On or about June 1, 2001, Defendants, KARIM KOUBRITI and AHMED HANNAN, met with an individual at the Arabian Village Café, [REDACTED], Dearborn, Michigan.

18. On or about June 3, 2001, Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” met with an individual at the [REDACTED], Dearborn, Michigan address.

19. In or about June, 2001, Defendants, KARIM KOUBRITI and AHMED HANNAN, introduced an individual to Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, in Dearborn, Michigan.

20. In or about June, 2001, Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” discussed with an individual their desire to obtain false travel and identification documents, including false U.S. and foreign passports, Social Security Administration Social Security Cards, and State of Michigan operators licenses, for themselves and others to disguise, hide or otherwise conceal the holder’s identity.

21. In or about June, 2001, Defendant, FAROUK ALI-HAIMOUD, a/k/a “Khalid,” told an individual that he planned to send money and weapons to “the brothers” in Algeria.

22. In or about June, 2001, Defendant, AHMED HANNAN, described to an individual the physical layout of the United States Embassy in Amman, Jordan.

23. In or about June, 2001, Defendant, FAROUK ALI-HAIMOUD, a/k/a “Khalid,” informed an individual that they, the Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” were attempting to obtain weapons from an African-American male in Detroit.

24. In or about June, 2001, Defendant, KARIM KOUBRITI, told an individual that he, Defendant, KARIM KOUBRITI, wanted to obtain a commercial driver’s license to transport hazardous materials.

25. In or about June, 2001, Defendant, KARIM KOUBRITI, spoke in code over a public telephone with an unindicted co-conspirator “brother” abroad to facilitate the importation of materials concealed in shoes.

26. In or about June, 2001, Defendants, KARIM KOUBRITI and AHMED HANNAN, at the request of Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a

NABIL HAYAMM, traveled to Detroit Metropolitan Airport to check for gaps in security.

27. In or about June, 2001, Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” had a conversation wherein they expressed anger over the treatment and confinement of Sheik Abdul Rahman in U.S. custody, and stated that Islam permitted the killing of innocent civilians.

28. On or about July 5, 2001, Defendants, KARIM KOUBRITI and AHMED HANNAN, were involved in a traffic accident in Dearborn, Michigan.

29. On or about July 16, 2001, Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, went to a location on Dix Street in Dearborn, where Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, received a wire transfer of \$1,206.19, in the name of “Nassim Hilali” from Amsterdam. The sender was identified as “Khaled Aly,” who Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, described as one of the “brothers” who were at the disposal of Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, throughout Europe and

elsewhere.

30. In or about July, 2001, Defendants, KARIM KOUBRITI and AHMED HANNAN, caused several identification documents to be removed from a residence.

31. In or about July, 2001, Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, contacted an individual in Dearborn, Michigan, told him that Defendants, KARIM KOUBRITI, AHMED HANNAN and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” had the false documents that were stolen from his residence, and that the false documents would be returned in exchange for a payment.

32. On or about August 10, 2001, an individual wrote Check Number 104, from
an account at TCF National Bank, Chicago, Illinois for \$1,000.00, payable to Defendant, KARIM KOUBRITI.

33. On or about August 10, 2001, Defendant, FAROUK ALI-HAIMOUD, a/k/a
“Khalid,” deposited Check Number 104, payable to Defendant, KARIM KOUBRITI, into Account Number 3130463909, at First Federal of Michigan.

All in violation of Title 18, United States Code, Section 2339A.

COUNT TWO
**(18 U.S.C. § 371 -- Conspiracy to Engage in Fraud and
Misuse of Visas, Permits and Other Documents)**

D-1 KARIM KOUBRITI,
D-2 AHMED HANNAN, and
D-4 ABDELLA LNU,
a/k/a JEAN PIERRE TARDELLI,
a/k/a GEORGE LABIBE,
a/k/a HUSSEIN MOHSEN SAFIDDINE,
a/k/a NABIL HAYAMM,
D-5 FAROUK ALI-HAIMOUD,
a/k/a “Khalid”

34. The allegations contained in Count One are realleged and incorporated herein.

35. That from in or about November, 2000, and continuing to on or about September 17, 2001, said dates being approximate, in the Eastern District of Michigan, Defendants, KARIM KOUBRITI, AHMED HANNAN, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” did combine, conspire, confederate and agree with each other and with others known and unknown to the Grand Jury, to engage in fraud and misuse of visas, permits, and other documents and related activity in connection with identification documents and information as defined in Title

18, United States Code, Sections 1546 (a) and (b).

All in violation of Title 18, United States Code, Section 371.

MANNER AND MEANS OF THE CONSPIRACY

36. In furtherance of said unlawful conspiracy, and attempting to achieve the objective thereof, the Defendants, KARIM KOUBRITI, AHMED HANNAN, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN

MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” performed, among other things, the following manner and means:

37. Defendants, KARIM KOUBRITI, AHMED HANNAN, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” attempted to obtain and did obtain false travel documents, including but not limited to, false passports, both U.S. and foreign; United States Department of Justice Immigration and Naturalization Service Resident Alien Cards; Social Security Administration Social Security Cards; and State of Michigan operators licences in order to present said false documentation to others in an effort to disguise, hide or otherwise conceal their true identity.

38. Defendants, KARIM KOUBRITI, AHMED HANNAN, ABDELLA LNU,

a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” attempted to obtain and did obtain false travel documents, including but not limited to, false passports, both U.S. and foreign; United States Department of Justice Immigration and Naturalization Service Resident Alien Cards; Social Security Administration Social Security Cards; and State of Michigan operators licences in order to provide said false documentation to others outside of the United States with the purpose and plan to assist others in entering the United States illegally.

39. Defendants, KARIM KOUBRITI, AHMED HANNAN, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” attempted to obtain and did obtain false travel documents, including but not limited to, false passports, both U.S. and foreign; United States Department of Justice Immigration and Naturalization Service Resident Alien Cards; Social Security Administration Social Security Cards; and State of Michigan operators licences in order to secure and maintain a mail repository in a name other than their own in order to disguise, hide or otherwise conceal the true identity of the actual individual to whom mail was directed.

OVERT ACTS

40. During the course of and in furtherance of the unlawful conspiracy, Defendants, KARIM KOUBRITI, AHMED HANNAN, ABDELLA LNU, a/k/a JEAN

PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” committed overt acts including, but not limited to the following:

41. On or about June 1, 2001, Defendants, KARIM KOUBRITI and AHMED HANNAN, met with an individual at the Arabian Village Café, [REDACTED], Dearborn, Michigan.

42. On or about June 3, 2001, Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” met with an individual at [REDACTED], Dearborn, Michigan.

43. In or about June, 2001, Defendants, KARIM KOUBRITI and AHMED HANNAN, introduced an individual to Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, in Dearborn, Michigan.

44. In or about June, 2001, Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a “Khalid,” discussed with an individual their desire to obtain false travel and identification documents, including false U.S. and foreign passports, Social Security Administration Social Security Cards, and State of Michigan operators licenses, for themselves and others to disguise, hide or otherwise

conceal the holder's identity.

45. In or about July, 2001, Defendants, KARIM KOUBRITI and AHMED HANNAN, caused several identification documents to be removed from a residence.

46. In or about July, 2001, Defendant, ABDELLA LNU, a/k/a JEAN PIERRE TARDELLI, a/k/a GEORGE LABIBE, a/k/a HUSSEIN MOHSEN SAFIDDINE, a/k/a NABIL HAYAMM, contacted an individual in Dearborn, Michigan, told him that Defendants, KARIM KOUBRITI, AHMED HANNAN and FAROUK ALI-HAIMOUD, a/k/a "Khalid," had the false documents that were removed from his residence and that the false documents would be returned in exchange for a payment.

47. On or about August 10, 2001, an individual wrote Check Number 104, from an account at TCF National Bank, Chicago, Illinois for \$1,000.00, payable to Defendant, KARIM KOUBRITI.

48. On or about August 10, 2001, Defendant, FAROUK ALI-HAIMOUD, a/k/a "Khalid," deposited Check Number 104, payable to Defendant, KARIM KOUBRITI, into Account Number 3130463909, at First Federal of Michigan.

All in violation of Title 18, United States Code, Section 371.

COUNT THREE
**(18 U.S.C. §1546 (a) and 2 -- Fraud and Misuse of Visas,
Permits and Other Documents)**

D-1 KARIM KOUBRITI
D-2 AHMED HANNAN
D-5 FAROUK ALI-HAIMOUD,
a/k/a "Khalid"

49. The allegations contained in Count One are realleged and incorporated herein.

50. Between on or about June 1, 2001, and on or about September 17, 2001, in the Eastern District of Michigan, the Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a "Khalid," did knowingly possess an immigrant visa, permit, border crossing card, alien registration card, or other document prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States, that is:

- A. United States of America VISA, bearing serial number 28540988, in the name of Michael Saisa;
- B. U.S. Department of Justice Immigration and Naturalization Service Resident Alien Card, bearing number AO91199150, in the name of Michael Saisa; and
- C. World Service Authority Passport, bearing number 319182, in the name of Michael Saisa

which the Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a "Khalid," knew to be forged, counterfeited, altered, falsely made, procured by means of a false claim or statement or otherwise procured by fraud or

unlawfully obtained, with said offense being committed to facilitate an act of international terrorism.

All in violation of Title 18, United States Code, Sections 1546 (a) and 2.

COUNT FOUR
**(18 U.S.C. §1028 (a) (6) and 2 -- Fraud and Related Activity in
Connection with Identification Documents and Information)**

D-1 KARIM KOUBRITI
D-2 AHMED HANNAN
D-5 FAROUK ALI-HAIMOUD,
a/k/a "Khalid"

51. The allegations contained in Count One are realleged and incorporated herein.

52. Between on or about June 1, 2001, and on or about September 17, 2001, in the Eastern District of Michigan, the Defendants, KARIM KOUBRITI, AHMED HANNAN, and FAROUK ALI-HAIMOUD, a/k/a "Khalid," did knowingly possess an identification document that was or appeared to be an identification document of the United States, to wit: Social Security Administration Social Security Card, 034-54-6538, in the name of Michael Saisa, which document was stolen or produced without lawful authority, knowing such document was stolen or produced without such authority.

All in violation of Title 18, United States Code, Section 1028 (a) (6) and 2.

THIS IS A TRUE BILL.

Foreperson

JEFFREY G. COLLINS
United States Attorney

RICHARD G. CONVERTINO
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DATED: August 28, 2002