



c. In or about May 2002, OUSSAMA ABDULLAH KASSIR, the defendant, called one of the individuals who had been present at the Bly, Oregon property to inquire about the arrest of another individual who had been present at the Bly, Oregon property by counterterrorism agents in the United States.

(Title 18, United States Code, Section 956(a).)

**COUNT EIGHT**

**CONSPIRACY TO PROVIDE AND CONCEAL  
MATERIAL SUPPORT AND RESOURCES TO TERRORISTS  
(KASSIR'S TERRORIST WEBSITES)**

The Grand Jury further charges:

15. From in or about at least December 2001, up to and including on or about December 11, 2005, in the Southern District of New York and elsewhere, OUSSAMA ABDULLAH KASSIR, a/k/a "Abu Abdullah," a/k/a "Abu Khadija," the defendant, and others known and unknown, at least one of whom was first brought to and arrested in the Southern District of New York, unlawfully and knowingly combined, conspired, confederated and agreed together and with each other to violate Section 2339A of Title 18, United States Code.

16. It was a part and an object of the conspiracy that OUSSAMA ABDULLAH KASSIR, the defendant, and others known and unknown, would and did provide material support and resources and conceal and disguise the nature, location, source, and ownership of material support and resources, knowing and intending that they



were to be used in preparation for, and in carrying out, a violation of Section 956 of Title 18, United States Code (conspiring to kill, kidnap, maim, and injure persons and to damage and destroy property in a foreign country), and in preparation for, and in carrying out, the concealment of an escape from the commission of such violation.

Overt Acts

17. In furtherance of said conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about December 2001, OUSSAMA ABDULLAH KASSIR, the defendant, established a website with the web address [mii.faiithweb.com](http://mii.faiithweb.com), which contained, among other things, terrorist materials and information and instructions on how to build a bomb.

b. In or about March 2002, OUSSAMA ABDULLAH KASSIR, the defendant, established a website on an internet server in White Plains, New York, with the web address [www.alqqa3qa3.8m.com](http://www.alqqa3qa3.8m.com), which contained, among other things, terrorist materials and information and instructions on how to build bombs and make poisons.

c. From in or about March 2002, up to and including in or about October 2003, OUSSAMA ABDULLAH KASSIR, the defendant, stored on his personal computer images of firearms, bombs, and other weapons which he had accumulated in connection with the operation of a website with the web address



www.uddat.8k.com.

(Title 18, United States Code, Section 2339A(a).)

COUNT NINE

PROVIDING AND CONCEALING  
MATERIAL SUPPORT AND RESOURCES TO TERRORISTS  
(KASSIR'S TERRORIST WEBSITES)

The Grand Jury further charges:

18. From in or about at least December 2001, up to and including on or about December 11, 2005, in the Southern District of New York and elsewhere, OUSSAMA ABDULLAH KASSIR, a/k/a "Abu Abdullah," a/k/a "Abu Khadija," the defendant, and others known and unknown, at least one of whom was first brought to and arrested in the Southern District of New York, unlawfully and knowingly did provide, and attempt to provide, material support and resources and conceal and disguise the nature, location, source, and ownership of material support and resources, knowing and intending that they were to be used in preparation for, and in carrying out, a violation of Section 956 of Title 18, United States Code (conspiring to kill, kidnap, maim, and injure persons and to damage and destroy property in a foreign country), and in preparation for, and in carrying out, the concealment and an escape from the commission of such violation.

(Title 18, United States Code, Sections 2339A and 2.)



COUNT TEN

CONSPIRACY TO PROVIDE MATERIAL SUPPORT  
AND RESOURCES TO A FOREIGN TERRORIST ORGANIZATION  
(KASSIR'S TERRORIST WEBSITES)

The Grand Jury further charges:

19. From in or about at least December 2001, up to and including on or about December 11, 2005, in the Southern District of New York and elsewhere, OUSSAMA ABDULLAH KASSIR, a/k/a "Abu Abdullah," a/k/a "Abu Khadija," the defendant, and others known and unknown, at least one of whom was first brought to and arrested in the Southern District of New York, unlawfully and knowingly combined, conspired, confederated and agreed together and with each other to violate Section 2339B of Title 18, United States Code.

20. It was a part and an object of the conspiracy that OUSSAMA ABDULLAH KASSIR, the defendant, and others known and unknown, would and did knowingly provide material support and resources to a foreign terrorist organization, to wit, a terrorist organization known as "al Qaeda" and led by Usama Bin Laden, which was designated by the Secretary of State as a foreign terrorist organization on or about October 8, 1999, pursuant to Section 219 of the Immigration and Nationality Act, and was redesignated as such on or about October 5, 2001, and October 2, 2003.

Overt Acts

21. In furtherance of said conspiracy, and to effect the illegal object thereof, the following overt act, and the overt acts



set out in Count Eight of this Indictment which are incorporated herein by this reference, were committed in the Southern District of New York and elsewhere:

a. In or about March 2002, OUSSAMA ABDULLAH KASSIR, the defendant, posted a document entitled "The Mujahideen Explosives Handbook" to a website he was operating with the web address [www.alqqa3qa3.8m.com](http://www.alqqa3qa3.8m.com).

(Title 18, United States Code, Section 2339B(a)(1).)

#### COUNT ELEVEN

#### PROVIDING MATERIAL SUPPORT AND RESOURCES TO A FOREIGN TERRORIST ORGANIZATION (KASSIR'S TERRORIST WEBSITES)

The Grand Jury further charges:

22. From in or about at least December 2001, up to and including on or about December 11, 2005, in the Southern District of New York and elsewhere, OUSSAMA ABDULLAH KASSIR, a/k/a "Abu Abdullah," a/k/a "Abu Khadija," the defendant, and others known and unknown, at least one of whom was first brought to and arrested in the Southern District of New York unlawfully and knowingly did provide, and attempt to provide, material support and resources to a foreign terrorist organization, to wit, a terrorist organization known as "al Qaeda" and led by Usama Bin Laden, which was designated by the Secretary of State as a foreign terrorist organization on or about October 8, 1999, pursuant to Section 219



of the Immigration and Nationality Act, and was redesignated as such on or about October 5, 2001, and October 2, 2003.

(Title 18, United States Code, Sections 2339B(a)(1) and 2.)

COUNT TWELVE

CONSPIRACY TO KILL, KIDNAP, MAIM,  
AND INJURE PERSONS IN A FOREIGN COUNTRY  
(KASSIR'S TERRORIST WEBSITES)

The Grand Jury further charges:

23. From in or about at least December 2001, up to and including on or about December 11, 2005, in the Southern District of New York and elsewhere, OUSSAMA ABDULLAH KASSIR, a/k/a "Abu Abdullah," a/k/a "Abu Khadija," the defendant, and others known and unknown, at least one of whom was first brought to and arrested in the Southern District of New York, within the jurisdiction of the United States, unlawfully and knowingly combined, conspired, confederated and agreed together and with each other to commit at a place outside the United States an act that would constitute the offense of murder, kidnapping, and maiming if committed in the special maritime and territorial jurisdiction of the United States.

Overt Acts

24. In furtherance of said conspiracy, and to effect the illegal objects thereof, the following overt act, and the overt acts set out in Count Eight of this Indictment which are incorporated herein by this reference, were committed in the



Southern District of New York and elsewhere:

a. In or about March 2002, OUSSAMA ABDULLAH KASSIR, the defendant, posted a document entitled "The Mujahideen Poisons Handbook" to a website he was operating with the web address [www.alqqa3qa3.8m.com](http://www.alqqa3qa3.8m.com).

(Title 18, United States Code, Section 956(a).)

**COUNT THIRTEEN**

**DISTRIBUTING INFORMATION RELATING TO EXPLOSIVES,  
DESTRUCTIVE DEVICES, AND WEAPONS OF MASS DESTRUCTION  
(KASSIR'S TERRORIST WEBSITES)**

The Grand Jury further charges:

25. From in or about at least December 2001, up to and including on or about December 11, 2005, in the Southern District of New York and elsewhere, OUSSAMA ABDULLAH KASSIR, a/k/a "Abu Abdullah," a/k/a "Abu Khadija," the defendant, and others known and unknown, at least one of whom was first brought to and arrested in the Southern District of New York, taught and demonstrated the making and use of explosives, destructive devices, and weapons of mass destruction, and distributed information pertaining to, in whole and in part, the manufacture and use of explosives, destructive devices, and weapons of mass destruction, with the intent that the teaching, demonstration, and information be used for, and in furtherance of, activities that constitute Federal crimes of violence, to wit, KASSIR established and operated



numerous websites, which contained, among other things, terrorist materials and information and instructions on how to build bombs and make poisons.

(Title 18, United States Code, Sections 842(p)(2)(A) and 2.)

COUNT FOURTEEN

PROVIDING ASSISTANCE AND INDUCEMENT IN THE DEVELOPMENT,  
PRODUCTION, AND USE OF CHEMICAL WEAPONS  
(KASSIR'S TERRORIST WEBSITES)

The Grand Jury further charges:

26. From in or about at least December 2001, up to and including on or about December 11, 2005; in the Southern District of New York and elsewhere, OUSSAMA ABDULLAH KASSIR, a/k/a "Abu Abdullah," a/k/a "Abu Khadija," the defendant, and others known and unknown, at least one of whom was first brought to and arrested in the Southern District of New York, assisted and induced persons to develop, produce, otherwise acquire, transfer directly and indirectly, receive, stockpile, retain, own, possess, use, and threaten to use chemical weapons, to wit, KASSIR established and operated numerous websites, which contained, among other things, terrorist materials and information and instructions on how to build bombs and make poisons.

(Title 18, United States Code, Sections 229(a) and 2.)