

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	CRIMINAL NO. 03 -
	)	
v.	)	Count 1: 18 USC § 371
	)	Conspiracy
RANDALL TODD ROYER,	)	
(Counts 1-3, 5, 11, 16, 23, 27-28, 30, 33-37))	)	Counts 2-5: 18 USC § 960 Commencing an Expedition Against a Friendly Nation
IBRAHIM AHMED AL-HAMDI	)	
(Counts 1, 3, 12, 16, 24, 27, 32, 38)	)	Counts 6-10: 18 USC 924(b) Receipt of Firearm or Ammunition with Cause to Believe a Felony will be Committed Therewith
MASOUD AHMAD KHAN	)	
(Counts 1, 3, 5, 16, 25, 34-37, 42)	)	Counts 11-12: 18 USC 924(g) Acquisition of Firearm after Arrival from Foreign Country with Intent to Engage in Crime of Violence
YONG KI KWON	)	
(Counts 1, 3, 5, 11, 13-14, 16, 28, 35)	)	Counts 13-15: 18 USC 924(h) Transfer of a Firearm for Use in a Crime of Violence
MOHAMMED AATIQUE	)	
(Counts 1, 5, 16, 34-35)	)	Count 16: 18 USC § 924(o) Conspiracy to Possess and Use a Firearm in Connection with a Crime of Violence
SEIFULLAH CHAPMAN	)	
(Counts 1, 3-5, 11-16, 29, 32)	)	Count 17: 18 USC § 1001(a) False Official Statement
HAMMAD ABDUR-RAHEEM	)	
(Counts 1, 3, 5, 7-11, 13-14, 16, 18-20, 40)	)	Counts 18-41: 18 USC § 924(c) Using A Firearm in Connection with a Crime of Violence
DONALD THOMAS SURRETT	)	
(Counts 1, 3, 5-6, 16, 19, 21, 41)	)	
CALIPH BASHA IBN ABDUR-RAHEEM	)	
(Counts 1, 8, 16, 18, 22, 39)	)	
KHWAJA MAHMOOD HASAN	)	
(Counts 1, 5, 16-17, 31, 34-37)	)	
SABRI BENKHALA	)	
(Counts 1, 16, 26)	)	

## INDICTMENT

June 2003 Term - At Alexandria

### General Allegations

#### THE GRAND JURY CHARGES THAT:

1. As used in this Indictment:

- a. “*Jihad*” describes a religious obligation of Muslims to struggle or strive for the defense of and advancement of Islam.
- b. “*Mujahideen*” describes warriors engaged in violent *jihad*.
- c. “*Shaheed*” describes *mujahideen* who have earned a place in paradise through death in the course of violent *jihad*.

2. *Kashmir* is a territory in the Indian subcontinent. Upon independence from the United Kingdom in 1947, the Indian subcontinent was divided into two states, India and Pakistan. After India and Pakistan fought their first war against each other in 1948, two-thirds of Kashmir ended up in India, and one-third in Pakistan. Although India is home to more than 100,000,000 Muslims, Kashmir is the only state in India with a Muslim majority.

3. *Markaz Dawa Wa’al Irshad*, roughly translated as “Center for Invitation [to Islam] and Instructions,” was founded in or about 1986 to organize Pakistani *mujahideen* participating in the *jihad* against the Russians in Afghanistan. As it expanded, education and *jihad* sections were separated. Consequently, a military wing of the *Markaz Dawa Wa’al Irshad* was established by Hafiz Mohammed Saeed in the name of *Lashkar-e-Taiba*, also known as *Lashker-e-Taiba*, *Lashkar-e-Toyeba*, *Lashkar -e-Toiba*, *Lashkar e-Tayyiba*, and *Lashkar-I-Taiba* (abbreviated herein where

appropriate as “LET”). Since the Russians left Afghanistan, the primary - - but not exclusive - - focus of *Markaz Dawa Wa’al Irshad* and *Lashkar-e-Taiba* has been on conducting *jihad* against the Government of India.

4. *Lashkar-e-Taiba* - - translated as “the Army of the Pure” or “the Army of the Righteous” - - claims to have trained thousands of *mujahideen* to fight in areas including Afghanistan, Kashmir, Bosnia, Chechnya, Kosovo, and the Philippines. *Lashkar-e-Taiba* claims to have four camps for training *mujahideen* from around the world, including camps known as Taiba, Aqsa, Um-al-Qur’a, and Abdullah bin Masud.

5. In November 1999, *Lashkar-e-Taiba* sponsored an international *mujahideen* conference. The highlights of the first day of the conference, as cited on *Lashkar-e-Taiba*’s website, [www.dawacenter.com](http://www.dawacenter.com), included a 40-foot-long banner portraying *Lashkar-e-Taiba*’s dagger penetrating the national flags of the United States, Russia, the United Kingdom, India, and Israel. According to the website, Hafiz Mohammed Saeed included the following in his speech to *mujahideen* from around the world gathered at the conference:

As the Prophet (Pbuh) said that Allah has placed his sustenance under the shadow of his sword. If *Jihad* is abolished, the infidels would snatch on us the same way a hungry person snatches on food. The *mujahideen* of *Lashker-e-Taiba* have continued the *Jihad* despite of all the negative propaganda against them . . . Today, people, more then ever, are prepared for *Jihad*. They are not afraid of any constraints. If India can brutally invade Kashmir then why can’t the *mujahideen* confront her there. The *Jihad* is not about Kashmir only. It encompasses all of India including Junagarh, Mavadar, and Hyderabad, etc. . . .

About 15 years ago, people might have found it ridiculous if someone had told them about the disintegration of the USSR. Today, I

announce the break-up of India, insha-Allah. We will not rest until the whole India is dissolved into Pakistan. . . May Allah bestow martyrdom on us and enter us into the higher ranks of Paradise by His mercy.

6. Between January 1, 2000, and September 10, 2001, the Washington Post and the Washington Times each carried over a dozen articles mentioning *Lashkar-e-Taiba*'s role in violence in Kashmir.

7. News media around the world widely reported the attack of *Lashkar-e-Taiba* against the historic Red Fort in New Dehli, India on December 23, 2000. According to CNN.com:

Pakistan-based guerrilla group Lashkar-e-Tayyaba claimed responsibility on Saturday [December 23, 2000] for a deadly attack on New Dehli's historic Red Fort.

The group also said that it would continue its attacks until India pulls its forces out of the restive Kashmir region. Two gunmen entered the Red Fort - - a landmark that houses both soldiers and civilians and draws thousands of tourists every day - - and attacked an army supply depot there Friday night, killing a civilian guard, police said. Two soldiers were gunned down as they left the depot.

The group's spokesman, Abu Osama, told Reuters by telephone: "This is our first operation against an Indian military installation inside India."

8. According to BBC News:

A hardline Kashmiri separatist group, Lashkar-e-Toiba, contacted the BBC to say there had been an attack. . . . The telephone callers from Lashkar-e-Toiba said there had been a scuffle in the Red Fort and that two of their militants were inside the building. They described it as a suicide mission. The group has admitted responsibility for a number of other such attacks in Kashmir.

9. In April 2001, in a "Taiba Bulletin" posted on the internet, *Lashker-e-Taiba* claimed that over 14,000 Indian soldiers were killed and that 1,000 *mujahideen* from *Lashker-e-Taiba* died in fighting *jihad* in Kashmir.

10. Between 1996 and December 2001, media outlets reported that *Lashkar-e-Taiba* was blamed for numerous massacres of over 300 Hindu civilians in separate incidents in Kashmir. For example, The New York Times reported that, on the eve of President Clinton's state visit to India in March 2000, terrorists massacred 34 Sikh men in Kashmir. On August 11, 2000, BBC News reported that two members of "*Lashkar-e-Toyeba*" were arrested for the massacre in the village of Chattisinghpura, and that one confessed to it.

11. On December 13, 2001, terrorists attacked India's Parliament while it was in session, resulting in 12 deaths. Media outlets reported that the Government of India blamed two groups for the attack, including *Lashkar-e-Taiba*.

12. On December 24, 2001, the United States designated *Lashkar-e-Taiba* a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act.

#### COUNT 1

#### Conspiracy

THE GRAND JURY FURTHER CHARGES THAT:

The Grand Jury realleges and incorporates by reference the General Allegations listed in this Indictment.

#### Objects of the Conspiracy

Beginning in or about January 2000 and continuing thereafter up to the present date, within Fairfax County in the Eastern District of Virginia and elsewhere, the defendants, RANDALL TODD ROYER, also known as "Ismail" Royer, MASOUD AHMAD KHAN, IBRAHIM AHMED AL-HAMDI, MOHAMMED AATIQUE, SEIFULLAH CHAPMAN, also known as Randall Blue

Chapman, HAMMAD ABDUR-RAHEEM, DONALD THOMAS SURRATT, also known as “Idris” Surratt, CALIPH BASHA IBN ABDUR-RAHEEM, KHWAJA MAHMOOD HASAN, SABRI BENKHALA, and YONG KI KWON, did unlawfully, willfully, and knowingly combine, conspire, confederate and agree together and with others known and unknown to the grand jury, to commit the following offenses against the United States:

1. Within the United States, to unlawfully, knowingly, and intentionally begin, provide for, prepare a means for, and take part in military expeditions and enterprises to be carried on from the United States against the territory and dominion of foreign states, districts and peoples with whom the United States was at peace, in violation of Title 18, United States Code, Section 960;

2. Within the United States, to unlawfully, knowingly, and intentionally enlist and engage with intent to serve in armed hostility against the United States, in violation of Title 18, United States Code, Section 2390;

3. To unlawfully, willfully, and knowingly use and attempt to use false and altered passports, in violation of Title 18, United States Code, Section 1543;

4. To unlawfully, knowingly, and intentionally transport and receive firearms and ammunition in interstate commerce with reason to believe that such firearms and ammunition would be used to commit a felony offense, in violation of Title 18, United States Code, Section 924(b);

5. To unlawfully, willfully, and knowingly obstruct foreign officials in the performance of their duties, in violation of Title 18, United States Code, Section 112(b);

6. To unlawfully, knowingly, and intentionally travel from foreign countries and states outside of Virginia into Virginia and acquire and transfer firearms in Virginia in furtherance of an intent to engage in

conduct that constitutes a violation of Title 18, United States Code, Section 960, a crime of violence as defined in Title 18, United States Code, Section 924(c)(3), in violation of Title 18, United States Code, Section 924(g); and

7. To unlawfully, knowingly, and intentionally transfer firearms, knowing that such firearms would be used to provide for and prepare a means for military expeditions and enterprises to be carried on from the United States against the territory and dominion of foreign states, districts and peoples with whom the United States was at peace, which conduct constitutes a violation of Title 18, United States Code, Section 960, and a crime of violence as defined in Title 18, United States Code, Section 924(c)(3), in violation of Title 18, United States Code, Section 924(h).

Ways, Manner and Means to Accomplish the Conspiracy

The purposes of the conspiracy were to prepare for and engage in violent *jihad* on behalf of Muslims in Kashmir, Chechnya, the Philippines and other countries and territories, against countries, governments, military forces, and peoples that the defendants and their conspirators believed to be the enemies of Islam. The ways, manner and means by which these purposes were carried out included the following:

1. It was part of the conspiracy that the defendants and their conspirators prepared to become *mujahideen* and die “*shaheed*” -- that is, as martyrs in furtherance of violent *jihad*.

2. It was further part of the conspiracy that certain of the defendants and their conspirators determined which nations and peoples were the enemies against whom they prepared to engage in *jihad*.

3. It was further part of the conspiracy that the defendants and their conspirators agreed to conduct their preparation for *jihad* in secrecy and to refuse to disclose any information about their activities if asked by law enforcement.

4. It was further part of the conspiracy that the defendants and their conspirators obtained AK-47-style rifles and similar weapons to develop familiarity and skills with the weapons of choice used by *mujahideen* in Bosnia, Chechnya, Kashmir, and elsewhere around the world.

5. It was further part of the conspiracy that the defendants and their conspirators practiced marksmanship with AK-47-style rifles and similar weapons at firing ranges operated by private parties or the United States military.

6. It was further part of the conspiracy that HAMMAD ABDUR-RAHEEM, CALIPH BASHA IBN ABDUR-RAHEM and certain of the defendants and their conspirators received ammunition and firearms accessories that they purchased in interstate commerce.

7. It was further part of the conspiracy that the defendants and their conspirators practiced small-unit military tactics on private property near Fredericksburg, Virginia.

8. It was further part of the conspiracy that the defendants and their conspirators used paint-ball weapons and equipment to practice small-unit military tactics and simulate actual combat in preparation for violent *jihad*.

9. It was further part of the conspiracy that DONALD THOMAS SURRATT, HAMMAD ABDUR-RAHEEM and SEIFULLAH CHAPMAN instructed conspirators in military tactics based upon their training and experience in the United States military.



10. It was further part of the conspiracy that the defendants and their conspirators gathered in private homes and in the Dar al Arqam Islamic Center in Falls Church, Virginia, to hear lectures on the righteousness of violent *jihad* in Kashmir, Chechnya, and other places around the world, and to watch videotapes of *mujahideen* engaged in *jihad* in such locations.

11. It was further part of the conspiracy that RANDALL TODD ROYER and IBRAHIM AHMED AL-HAMDI recruited conspirators for service with the *Lashkar-e-Taiba*.

12. It was further part of the conspiracy that RANDALL TODD ROYER made telephone calls to introduce and sponsor defendants and conspirators for service with *Lashkar-e-Taiba*.

13. It was further part of the conspiracy that the defendants and their conspirators used aliases or “Abu names” in their communications with *Lashkar-e-Taiba* so that they would not have to use their real names. For example, IBRAHIM AHMED AL-HAMDI used the name “Abu Harith,” RANDALL TODD ROYER used the name “Abu Fatima” and “Abu Hamza,” MASOUD AHMAD KHAN used the name “Abu Ibrahim,” MOHAMMED AATIQUE used the name “Abu Omar,” KHWAJA MAHMOOD HASAN used the name “Abu Qatama,” and YONG KI KWON used the name “Abu Ubaydah.”

14. It was further part of the conspiracy that certain of the defendants and their conspirators obtained visas in the United States for travel to Pakistan and other countries by providing false information about the purpose of their visit to Pakistan and those other countries.

15. It was further part of the conspiracy that certain of the defendants and their conspirators traveled to Pakistan and other countries to engage in *jihad* and die *shaheed*.

16. It was further part of the conspiracy that certain of the defendants and their conspirators traveled from the United States to *Lashkar-e-Taiba* camps in northeast Pakistan where military training, including the use of lethal weapons, is provided (hereinafter “*Lashkar-e-Taiba* camps”).

17. It was further part of the conspiracy that certain of the defendants and their conspirators served with *Lashkar-e-Taiba* at LET camps in Pakistan.

18. It was further part of the conspiracy that certain of the defendants and their conspirators trained in the use of various weapons, including small arms, machine guns, and grenade launchers, while serving in *Lashkar-e-Taiba* camps in Pakistan.

19. It was further part of the conspiracy that RANDALL TODD ROYER and IBRAHIM AHMED AL-HAMDI fired at Indian positions in Kashmir.

#### Overt Acts

In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, the defendants and their conspirators committed overt acts in the Eastern District of Virginia, and elsewhere, including but not limited to the following:

1. On or about January 10, 2000, HAMDAD ABDUR-RAHEEM sold a AK-47 rifle to CALIPH BASHA IBN ABDUR-RAHEEM in the presence of YONG KI KWON and SEIFULLAH CHAPMAN.

2. On or about January 29, 2000, DONALD THOMAS SURRATT used the American Express card of HAMDAD ABDUR-RAHEEM to purchase a Saiga 7.62 mm semi-automatic rifle in Forrestville, Maryland.

3. In or about early 2000, MASOUD AHMAD KHAN trained with a firearm at a firing range near York, Pennsylvania.
4. On or about February 23, 2000, RANDALL TODD ROYER traveled to the Pakistani Embassy in Washington, D.C., to obtain a visa to enter Pakistan.
5. On or about February 23, 2000, in Washington, D.C., RANDALL TODD ROYER falsely stated in a visa application that the purpose of his upcoming visit to Pakistan was “tourism.”
6. On or about February 24, 2000, HAMMAD ABDUR-RAHEEM and DONALD THOMAS SURRATT trained with firearms at a firing range in Fairfax, Virginia.
7. On or about March 3, 2000, HAMMAD ABDUR-RAHEEM purchased a Romarm Romak-3 AK-47-style semi-automatic rifle in Leesburg, Virginia.
8. On or about March 9, 2000, CALIPH BASHA IBN ABDUR-RAHEEM trained with firearms at a firing range in Fairfax, Virginia.
9. On or about April 10, 2000, RANDALL TODD ROYER entered Pakistan to serve with the *Lashkar-e-Taiba* at an LET camp in Pakistan.
10. On or about April 13, 2000, Nabil Garbeih trained with firearms at a firing range in Fairfax, Virginia.
11. On or about April 20, 2000, in Lahore, Pakistan, RANDALL TODD ROYER set up an internet-based newsletter for *Lashkar-e-Taiba*.
12. In or about May 2000, RANDALL TODD ROYER fired at Indian positions in Kashmir.
13. In or about May 2000, RANDALL TODD ROYER visited a graveyard for non-Pakistani *mujahideen*, who died *shaheed* while fighting Indians in Kashmir with *Lashkar-e-Taiba*.

14. On or about May 3, 2000, RANDALL TODD ROYER departed Pakistan to return to the United States.

15. In or about mid-2000, MASOUD AHMAD KHAN trained with firearms at a firing range near York, Pennsylvania.

16. In or about June 2000, at a dinner at the home of IBRAHIM AHMED AL-HAMDI, RANDALL TODD ROYER described to YONG KI KWON, HAMMAD ABDUR-RAHEEM, CALIPH BASHA IBN ABDUR-RAHEEM, KHWAJA MAHMOOD HASAN, DONALD THOMAS SURRATT, and others his experience serving with the *Lashkar-e-Taiba* in Pakistan.

17. In or about June 2000, at the dinner at the home of IBRAHIM AHMED AL-HAMDI, Unindicted Conspirator #1 instructed RANDALL ROYER, YONG KI KWON, HAMMAD ABDUR-RAHEEM, CALIPH BASHA IBN ABDUR-RAHEEM, KHWAJA MAHMOOD HASAN, DONALD THOMAS SURRATT, and others not to discuss elsewhere what RANDALL TODD ROYER said regarding his experiences with the *Lashkar-e-Taiba* in Pakistan.

18. On or about July 24, 2000, HAMMAD ABDUR-RAHEEM purchased 440 rounds of ammunition for an AK-47-style semi-automatic rifle, delivered by UPS from a vendor in Kentucky.

19. In or about August 2000, from Falls Church, Virginia, RANDALL TODD ROYER telephoned *Lashkar-e-Taiba* in Pakistan to arrange for *Lashkar-e-Taiba* to accept IBRAHIM AHMED AL-HAMDI in its service.

20. In or about August 2000, MASOUD AHMAD KHAN purchased IBRAHIM AHMED AL-HAMDI's car for \$4,000 so that IBRAHIM AHMED AL-HAMDI would have the money to fly to Pakistan.

21. In or about August 2000, RANDALL TODD ROYER provided IBRAHIM AHMED AL-HAMDI a telephone number for *Lashkar-e-Taiba* in Lahore, Pakistan, for AL-HAMDI to use to make contact with *Lashkar-e-Taiba* upon his arrival in Pakistan.

22. On or about August 18, 2000, RANDALL TODD ROYER traveled with IBRAHIM AHMED AL-HAMDI from Virginia to the Pakistani Embassy in Washington, D.C., for IBRAHIM AHMED AL-HAMDI to obtain a Pakistani visa.

23. On or about August 18, 2000, IBRAHIM AHMED AL-HAMDI falsely stated on an application for a visa to enter Pakistan that the purpose of his trip to Pakistan was tourism.

24. On or about August 20, 2000, YONG KI KWON and MASOUD AHMAD KHAN drove IBRAHIM AHMED AL-HAMDI from Alexandria, Virginia, to Washington Dulles International Airport so that AL-HAMDI could depart for Pakistan to engage in *jihād* and become a *shaheed*.

25. In or about August 2000, IBRAHIM AHMED AL-HAMDI commenced service with *Lashkar-e-Taiba* at an LET camp in Pakistan.

26. In or about September 2000, IBRAHIM AHMED AL-HAMDI, at a *Lashkar-e-Taiba* camp in Pakistan, fired a machine gun.

27. In or about September 2000, IBRAHIM AHMED AL-HAMDI fired at Indian positions in Kashmir.

28. On or about September 17, 2000, YONG KI KWON sold an AK-47-style semi-automatic rifle to RANDALL TODD ROYER in the presence of SEIFULLAH CHAPMAN and HAMMAD ABDUR-RAHEEM.

29. On or about September 24, 2000, KHWAJA MAHMOOD HASAN trained with a firearm at a firing range in Fairfax, Virginia.

30. On or about September 25, 2000, IBRAHIM AHMED AL-HAMDI departed Pakistan to return to the United States.

31. On or about October 6, 2000, SEIFULLAH CHAPMAN trained with a Russian-made Saiga .308 sniper rifle at a firing range at the Quantico Marine Base in Prince William County, Virginia.

32. On or about October 13, 2000, HAMMAD ABDUR-RAHEEM purchased 500 rounds of hollow point ammunition for an AK-47-style semi-automatic rifle for delivery by UPS from a vendor in Kentucky to the residence of CALIPH BASHA IBN ABDUR-RAHEEM.

33. On or about December 18, 2000, IBRAHIM AHMED AL-HAMDI purchased a Russian-made Saiga .308 sniper rifle from SEIFULLAH CHAPMAN.

34. On or about January 23, 2001, HAMMAD ABDUR-RAHEEM purchased 1000 rounds of 7.62 mm ammunition for an AK-47-style semi-automatic rifle for delivery by UPS from a vendor in Kentucky.

35. On or about January 24, 2001, CALIPH BASHA IBN ABDUR-RAHEEM possessed 400 rounds of 7.62 mm ammunition at 2900 John Marshall Drive in Falls Church, Virginia.

36. On or about March 9, 2001, HAMMAD ABDUR-RAHEEM purchased a scope for an AR-15 semi-automatic rifle for delivery by UPS from a vendor in Kentucky.

37. On or about March 11, 2001, HAMMAD ABDUR-RAHEEM, IBRAHIM AHMED AL-HAMDI, and other conspirators practiced military tactics using paint-ball equipment in Spotsylvania County, Virginia.

38. On or about April 4, 2001, at the residence of IBRAHAM AHMED AL-HAMDI in Alexandria, Virginia, a visitor representing the Benevolence International Foundation discussed a *mujahideen* camp in Bosnia with Nabil T. Garbieh and other conspirators.

39. On or about April 4, 2001, at the residence of IBRAHAM AHMED AL-HAMDI in Alexandria, Virginia, Nabil T. Garbieh and other conspirators watched videos depicting *mujahideen* engaged in *jihad*.

40. On or about April 5, 2001, Nabil T. Garbieh and other conspirators practiced military tactics using paint-ball equipment in Spotsylvania County, Virginia.

41. In or about July 2001, SEIFULLAH CHAPMAN traveled from Alexandria, Virginia, to Pakistan to serve with *Lashkar-e-Taiba* in Pakistan.

42. In or about July 2001, YONG KI KWON advised MOHAMMED AATIQUE to contact RANDALL TODD ROYER regarding AATIQUE's desire to serve with the *Lashkar-e-Taiba* in Pakistan.

43. In or about July 2001, MOHAMMED AATIQUE told RANDALL TODD ROYER that MOHAMMED AATIQUE wanted to serve with the *Lashkar-e-Taiba* in Pakistan.

44. In or about July 2001, MOHAMMED AATIQUE traveled from Pennsylvania to Virginia, so that RANDALL TODD ROYER could provide him assistance in gaining admission to the *Lashkar-e-Taiba* in Pakistan.

45. In or about July 2001, RANDALL TODD ROYER telephoned *Lashkar-e-Taiba* in Pakistan regarding MOHAMMED AATIQUE's desire to serve with *Lashkar-e-Taiba* in Pakistan.

46. In or about July 2001, RANDALL TODD ROYER provided MOHAMMED AATIQUE a telephone number in Pakistan for AATIQUE to use to contact *Lashkar-e-Taiba* upon his arrival in Pakistan.

47. In or about August 2001, RANDALL TODD ROYER provided MOHAMMED AATIQUE a letter of reference for AATIQUE to use to gain admission to the *Lashkar-e-Taiba* in Pakistan.

48. In or about early September 2001, MOHAMMED AATIQUE arranged to travel to Pakistan to serve with the *Lashkar-e-Taiba*.

49. In or about early September 2001, SEIFULLAH CHAPMAN joined the *mujahideen* at a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan.

50. On or about September 11, 2001, Unindicted Conspirator #1 told YONG KI KWON to gather those who possessed firearms for a meeting.

51. On or about September 15, 2001, at a meeting at the house of YONG KI KWON in Fairfax, Virginia, Unindicted Conspirator #1 told RANDALL TODD ROYER, KHWAJA MAHMOOD HASAN, MASOUD AHMAD KHAN, MOHAMMED AATIQUE, HAMMAD ABDUR-RAHEEM, and CALIPH BASHA IBN ABDUR-RAHEEM that the time had come for them to go abroad to join the *mujahideen* engaged in violent *jihad* in Kashmir, Chechnya, Afghanistan, or Indonesia.

52. On or about September 15, 2001, at a meeting at the house of YONG KI KWON in Fairfax, Virginia, Unindicted Conspirator #1 told the conspirators that they could fulfill their duty to



engage in *jihad* by joining the *Lashkar-e-Taiba* in Pakistan, because the *Lashkar-e-Taiba* was on the correct path.

53. On or about September 15, 2001, at a meeting at the house of YONG KI KWON in Fairfax, Virginia, Unindicted Conspirator #1 told the conspirators that American troops were legitimate targets of the *jihad* in which the conspirators had a duty to engage.

54. On or about September 15, 2001, at a meeting at the house of YONG KI KWON, Unindicted Conspirator #1 told the conspirators that RANDALL TODD ROYER could facilitate their entry into the *Lashkar-e-Taiba* in Pakistan.

55. On or about September 15, 2001, YONG KI KWON, KHWAJA MAHMOOD HASAN, MASOUD AHMAD KHAN, and MOHAMMED AATIQUE expressed their agreement to join the *Lashkar-e-Taiba* in Pakistan.

56. On or about September 15, 2001, RANDALL TODD ROYER met with YONG KI KWON, KHWAJA MAHMOOD HASAN, and MASOUD AHMAD KHAN at a 7-11 store in Virginia.

57. On or about September 15, 2001, RANDALL TODD ROYER purchased a long-distance telephone card at a 7-11 store in Virginia.

58. On or about September 15, 2001, using the long distance telephone card, RANDALL TODD ROYER provided to his *Lashkar-e-Taiba* contact in Pakistan the physical descriptions of YONG KI KWON, KHWAJA MAHMOOD HASAN, and MASOUD AHMAD KHAN as three individuals who wished to join *Lashkar-e-Taiba*.

59. On or about September 15, 2001, RANDALL TODD ROYER provided YONG KI KWON with instructions and a phone number to call when YONG KI KWON, KHWAJA MAHMOOD HASAN, and MASOUD AHMAD KHAN arrived in Pakistan.

60. On or about September 15, 2001, MASOUD AHMAD KHAN provided YONG KI KWON with an advertisement from Cabela's mail order catalog describing a jacket that KHAN recommended be used while serving among the *mujahideen* with the *Lashkar-e-Taiba* in Pakistan.

61. On or about September 15, 2001, YONG KI KWON ordered three jackets from Cabela's for use while serving among the *mujahideen* with the *Lashkar-e-Taiba* in Pakistan, including one for KWON, one for MAHMOOD HASAN, and one for HAMMAD ABDUR-RAHEEM.

62. On or about September 17, 2001, Unindicted Conspirator #1 advised YONG KI KWON and KHWAJA MAHMOOD HASAN how to reach the *Lashkar-e-Taiba* camp undetected.

63. On or about September 17, 2001, YONG KI KWON and KHWAJA MAHMOOD HASAN traveled to the Pakistani Embassy in Washington, D.C. to apply for visas to travel to Pakistan.

64. On or about September 17, 2001, YONG KI KWON falsely claimed on his Pakistani visa application that the purpose of his trip was to attend a wedding.

65. On or about September 17, 2001, KHWAJA MAHMOOD HASAN falsely claimed on his Pakistani visa application that the purpose of his trip was to attend a wedding.

66. On or about September 17, 2001, after DONALD THOMAS SURRATT received a telephone call from YONG KI KWON at the residence of HAMMAD ABDUR-RAHEEM, ABDUR-RAHEEM told SURRATT that, as a result of a previous meeting with Unindicted Conspirator #1, KWON and KHWAJA MAHMOOD HASAN had decided to go to Pakistan.

67. On or about September 18, 2001, MASOUD KHAN claimed on his Pakistani visa application that the purpose of his trip was “visit.”

68. On or about September 18, 2001, YONG KI KWON and KHWAJA MAHMOOD HASAN drove MASOUD AHMAD KHAN to Pennsylvania to spend the night at the home of MOHAMMED AATIQUE.

69. On or about September 19, 2001, YONG KI KWON and KHWAJA MAHMOOD HASAN returned to Virginia to make final preparations for their trip to Pakistan.

70. On or about September 19, 2001, MOHAMMED AATIQUE and MASOUD AHMAD KHAN traveled from JFK Airport in New York, to Karachi, Pakistan.

71. On or about September 19, 2001, YONG KI KWON gave HAMMAD ABDUR-RAHEEM one of the jackets from Cabela’s that KWON had obtained to wear while serving among the *mujahideen* with the *Lashkar-e-Taiba*.

72. On or about September 20, 2001, YONG KI KWON and KHWAJA MAHMOOD HASAN rode to Dulles Airport to board their flights for Pakistan via New York and Manchester, England.

73. On or about September 20, 2001, MOHAMMED AATIQUE and MASOUD AHMAD KHAN arrived in Karachi, Pakistan.

74. On or about September 22, 2001, YONG KI KWON and KHWAJA MAHMOOD HASAN arrived in Karachi, Pakistan.

75. On or about September 22, 2001, in Alexandria, Virginia, RANDALL TODD ROYER possessed in his automobile an AK-47-style rifle and 219 rounds of ammunition.

76. In or about late September 2001, MOHAMMED AATIQUE traveled to a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan.

77. In or about early October 2001, YONG KI KWON, KHWAJA MAHMOOD HASAN, and MASOUD AHMAD KHAN traveled with a *Lashkar-e-Taiba* operative to a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan.

78. In or about October 2001, YONG KI KWON fired an AK-47 rifle at a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan.

79. In or about October 2001, KHWAJA MAHMOOD HASAN fired an AK-47 rifle at a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan.

80. In or about October 2001, MASOUD AHMAD KHAN fired an AK-47 rifle at a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan.

81. In or about October 2001, MOHAMMED AATIQUE fired an AK-47 rifle at a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan.

82. In or about October 2001, at a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan, KHWAJA MAHMOOD HASAN fired a 12mm antiaircraft gun.

83. In or about October 2001, at a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan, MASOUD AHMAD KHAN fired a 12mm antiaircraft gun.

84. In or about October 2001, at a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan, MOHAMMED AATIQUE fired a 12mm antiaircraft gun.

85. In or about October 2001, at a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan, YONG KI KWON fired a machine gun.

86. In or about October 2001, at a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan, KHWAJA MAHMOOD HASAN fired a machine gun.

87. In or about October 2001, at a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan, MASOUD AHMAD KHAN fired a machine gun.

88. In or about October 2001, at a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan, MOHAMMED AATIQUE fired a machine gun.

89. In or about October 2001, at a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan, YONG KI KWON fired a rocket-propelled grenade.

90. In or about October 2001, at a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan, KHWAJA MAHMOOD HASAN fired a rocket-propelled grenade.

91. In or about October 2001, at a *Lashkar-e-Taiba* camp near Muzafrabad, Pakistan, MASOUD AHMAD KHAN fired a rocket-propelled grenade.

92. On or about October 15, 2001, IBRAHIM AHMED AL-HAMDI organized a meeting at the residence of Unindicted Conspirator #1, attended by DONALD THOMAS SURRATT, HAMMAD ABDUR-RAHEEM, CALIPH BASHA IBN ABDUR-RAHEEM, and other unindicted conspirators.

93. On or about October 15, 2001, before the meeting started, IBRAHIM AHMED AL-HAMDI after describing to DONALD THOMAS SURRATT, HAMMAD ABDUR-RAHEEM, and CALIPH BASHA IBN ABDUR-RAHEEM his experiences serving with the *Lashkar-e-Taiba* in Pakistan, recommended that they travel to Pakistan to serve with the *Lashkar-e-Taiba* as well.

94. On or about October 15, 2001, during the meeting, Unindicted Conspirator #1 recommended to his listeners that they serve with the *Lashkar-e-Taiba* because its belief system was good and the *Lashkar-e-Taiba* focuses on combat.

95. On or about October 15, 2001, during the meeting, Unindicted Conspirator #1 provided historical examples from Islamic history justifying attacks on civilians.

96. On or about October 15, 2001, during the meeting, Unindicted Conspirator #1 told his listeners that fighting Americans in Afghanistan was a valid *jihad* for Muslims.

97. On or about October 15, 2001, during the meeting, Unindicted Conspirator #1 told his listeners that *mujahideen* killed while fighting Americans in Afghanistan would die as martyrs, or *shaheed*.

98. In or about November 2001, YONG KI KWON, KHWAJA MAHMOOD HASAN, MASOUD AHMAD KHAN, and Unindicted Conspirator #2 traveled to a *Lashkar-e-Taiba* office in Lahore, Pakistan.

99. In or about December 2001, RANDALL TODD ROYER and IBRAHIM AHMED AL-HAMDI encouraged DONALD THOMAS SURRETT, HAMMAD ABDUR-RAHEEM, and CALIPH BASHA IBN ABDUR-RAHEEM to travel to Pakistan to serve with the *Lashkar-e-Taiba*.

100. In or about the spring of 2002, RANDALL TODD ROYER attempted to travel to Pakistan from Bosnia.

101. On or about June 10, 2002, in St. Louis, Missouri, RANDALL TODD ROYER falsely stated to law enforcement agents that the primary reason he purchased the AK-47-style rifle from YONG KI KWON was for hunting, and that he and YONG KI KWON were hunting partners who

had taken their weapons to West Virginia on more than one occasion for the purposes of hunting and target practice.

102. On or about June 27, 2002, in Falls Church, Virginia, KHWAJA MAHMOOD HASAN falsely stated to law enforcement agents that he did not participate in any form of military training or service during his travel to Pakistan in 2001.

103. On or about December 10, 2002, MASOUD AHMAD KHAN purchased an auto-pilot module for a radio-controlled model aircraft.

104. On or about February 1, 2003, in a message celebrating the crash of the Space Shuttle Columbia, Unindicted Conspirator #1 advised his followers that the United States was the greatest enemy of Muslims.

105. On or about February 25, 2003, in Annandale, Virginia, IBRAHIM AHMED AL-HAMDI possessed a Russian made Saiga 308-1, .308 caliber rifle with a telescopic lens, and two magazines loaded with .308 caliber ammunition and tracer rounds, as well as documents relating to *jihad* and martyrdom operations.

106. On or about February 25, 2003, in Annandale, Virginia, IBRAHIM AHMED AL-HAMDI possessed the telephone number for *Lashkar-e-Taiba* in Lahore, Pakistan, as the apparent contact telephone number for SABRI BENKHALA.

107. On or about March 24, 2003, in Annandale, Virginia, CALIPH BASHA IBN ABDUR-RAHEEM possessed an AK-47-style rifle and approximately 500 rounds of ammunition.

108. On or about April 1, 2003, in Falls Church, Virginia, HAMMAD ABDUR-RAHEEM possessed an AK-47-style rifle.

109. On or about May 8, 2003, in Suitland, Maryland, DONALD THOMAS SURRATT possessed an AK-47-style rifle.

110. On or about May 8, 2003, in Gaithersburg, Maryland, MASOUD AHMAD KHAN possessed an AK-47-style rifle.

111. On or about May 8, 2003, in Gaithersburg, Maryland, MASOUD AHMAD KHAN possessed a document entitled "The Terrorist's Handbook" containing instructions regarding how to manufacture and use explosives and chemicals as weapons.

112. On or about May 8, 2003, in Gaithersburg, Maryland, MASOUD AHMAD KHAN possessed a photograph downloaded from the Internet of the FBI Headquarters building in Washington, D.C.

(In violation of Title 18, United States Code, Section 371)



COUNT 2

Commencing an Expedition Against a Friendly Nation

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations and the overt acts listed in Count One of this Indictment.
  
2. From on or about February 23, 2000, to on or about May 3, 2000, in Falls Church, in the Eastern District of Virginia, and elsewhere, defendant RANDALL TODD ROYER did unlawfully and knowingly begin, provide for, prepare a means for, and take part in a military expedition and enterprise to be carried on from the United States against the territory and dominion of India, a foreign state with whom the United States was at peace.

(In violation of Title 18, United States Code, Section 960.)

COUNT 3

Commencing an Expedition Against a Friendly Nation

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations and the overt acts listed in Count One of this Indictment.
  
2. From on or about February 23, 2000, to on or about September 26, 2000, in Falls Church, in the Eastern District of Virginia, and elsewhere, defendant IBRAHIM AHMED AL-HAMDI, aided and abetted by defendants RANDALL TODD ROYER, DONALD THOMAS SURRETT, HAMDAD ABDUR-RAHEEM, SEIFULLAH CHAPMAN, YONG KI KWON and MASOUD AHMAD KHAN, did unlawfully and knowingly begin, provide for, prepare a means for, and take part in a military expedition and enterprise to be carried on from the United States against the territory and dominion of India, a foreign state with whom the United States was at peace.

(In violation of Title 18, United States Code, Sections 960 and 2(a).)

COUNT 4

Commencing an Expedition Against a Friendly Nation

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations and the overt acts listed in Count One of this Indictment.
  
2. From in or about July 2001, to in or about September 2001, in the City of Alexandria, in the Eastern District of Virginia, and elsewhere, defendant SEIFULLAH CHAPMAN, also known as Randall Blue Chapman, did unlawfully and knowingly begin, provide for, prepare a means for, and take part in a military expedition and enterprise to be carried on from the United States against the territory and dominion of India, a foreign state with whom the United States was at peace.

(In violation of Title 18, United States Code, Sections 960.)

COUNT 5

Commencing an Expedition Against a Friendly Nation

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations and the overt acts listed in Count One of this Indictment.
  
2. From in or about January 2000, to in or about October 2001, in Fairfax and Spotsylvania Counties in the Eastern District of Virginia, and elsewhere, defendants YONG KI KWON, MASOUD AHMAD KHAN, MOHAMMED AATIQUE, and KHWAJA MAHMOOD HASAN, aided and abetted by one another and by defendants RANDALL TODD ROYER, DONALD THOMAS SURRATT, SEIFULLAH CHAPMAN, and HAMMAD ABDUR-RAHEEM, did unlawfully and knowingly begin, provide for, prepare a means for, and take part in a military expedition and enterprise to be carried on from the United States against the territory and dominion of India, a foreign state with whom the United States was at peace.

(In violation of Title 18, United States Code, Sections 960 and 2(a))

COUNTS 6-10

Receipt of Firearms With Cause to Believe That a Felony is to be Committed Therewith

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations and the overt acts listed in Count One of this Indictment.

2. On or about the following dates, in Fairfax County in the Eastern District of Virginia and elsewhere as identified below, defendants HAMMAD ABDUR-RAHEEM, DONALD THOMAS SURRATT, and CALIPH BASHA IBN ABDUR-RAHEEM, with knowledge and reasonable cause to believe that offenses punishable by imprisonment for a term exceeding one year were to be committed therewith, did transport and receive a firearm and ammunition in interstate commerce, as described below:

<u>Count</u>	<u>Defendants</u>	<u>Date</u>	<u>Firearm or ammunition</u>	<u>Location</u>	<u>Transport or Receive</u>
6.	Surratt	February 24, 2000	AK-47-style rifle	Fairfax, VA	Transport
7.	Abdur-Raheem	July 24, 2000	440 rounds of ammo	Fairfax, VA	Receive
8.	Abdur-Raheem Calif Basha	October 13, 2000	500 rounds of ammo	Fairfax, VA	Receive
9.	Abdur-Raheem	January 23, 2001	1000 rounds of ammo	Fairfax, VA	Receive
10.	Abdur-Raheem	March 9, 2001	scope for AR-15 rifle	Fairfax, VA	Receive

(In violation of Title 18, United States Code, Sections 924(b) and 2(a).)

COUNTS 11-12

Acquisition of Firearms With Cause to Believe That a Felony is to be Committed Therewith

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations and the overt acts listed in Count One of this Indictment.

2. On or about the following dates, in Fairfax County in the Eastern District of Virginia and elsewhere as identified below, with the intent to engage in conduct which constitutes a crime of violence as defined in Title 18, United States Code, Section 924(c)(3), defendants RANDALL TODD ROYER and IBRAHIM AHMED AL-HAMDI, aided and abetted by SEIFULLAH CHAPMAN, HAMDAD ABDUR-RAHEEM, and YONG KI KWON, did travel to the Commonwealth of Virginia from a foreign country or state outside of Virginia and acquire, transfer, and attempt to acquire and transfer in Virginia a firearm in furtherance of such purpose as described below:

<u>Count</u>	<u>Defendants</u>	<u>Date</u>	<u>Firearm</u>	<u>Location</u>
11.	Royer Kwon Abdur-Raheem Chapman	Sept. 17, 2000	AK-47-style rifle	Falls Church, VA
12.	Al-Hamdi Chapman	Dec.18, 2000	Saiga .308 rifle	Alexandria, VA

(In violation of Title 18, United States Code, Sections 924(g) and 2(a).)

COUNTS 13-15

Transfer of Firearms for Use in Commission of Crime of Violence

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations and the overt acts listed in Count One of this Indictment.

2. On or about the following dates, in Fairfax County in the Eastern District of Virginia and elsewhere as identified below, defendants SEIFULLAH CHAPMAN, HAMDAD ABDUR-RAHEEM, and YONG KI KWON, did unlawfully and knowingly transfer a firearm knowing that such firearm would be used to commit a crime of violence as defined in Title 18, United States Code, Section 924(c)(3), as described below:

<u>Count</u>	<u>Defendants</u>	<u>Date</u>	<u>Firearm</u>	<u>Location</u>
13.	Abdur-Raheem Kwon Chapman	January 10, 2000	AK-47-style rifle	Fairfax, VA
14.	Kwon Abdur-Raheem Chapman	September 17, 2000	AK-47-style rifle	Fairfax, VA
15.	Chapman	December 18, 2000	Saiga .308 rifle	Alexandria, VA



(In violation of Title 18, United States Code, Sections 924(h) and 2(a).)

Count 16

Conspiracy to Possess and Use a Firearm in Connection with a Crime of Violence

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations of this Indictment.
  
2. From on or about January 2000 and continuing thereafter up to the present date, in Fairfax County in the Eastern District of Virginia and elsewhere, defendants RANDALL TODD ROYER, MASOUD AHMAD KHAN, IBRAHIM AHMED AL-HAMDI, SEIFULLAH CHAPMAN, DONALD THOMAS SURRATT, HAMDAD ABDUR-RAHEEM, CALIPH BASHA IBN ABDUR-RAHEEM, MOHAMMED AATIQUE, YONG KI KWON, SABRI BENKHALA, and KHWAJA MAHMOOD HASAN did unlawfully, knowingly and intentionally combine, conspire, confederate and agree together and with others known and unknown to the grand jury, to use, carry, possess and discharge firearms during, in relation to, and in furtherance of crimes of violence for which the defendants may be prosecuted in a court of the United States.

In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, the defendants committed overt acts in the Eastern District of Virginia, and elsewhere, included but not limited to the overt acts listed in Count One of this Indictment, which are realleged and reincorporated by reference herein.

(In violation of Title 18, United States Code, Sections 924(o) and (c))

COUNT 17

False Official Statements

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations and the overt acts listed in Count One of this Indictment.
2. On or about June 27, 2002, in the City of Falls Church in the Eastern District of Virginia, defendant KHWAJA MAHMOOD HASAN did knowingly and willfully make material false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit, HASAN falsely stated to law enforcement agents that he did not participate in any form of military training or service during his travel to Pakistan in 2001.

(In violation of Title 18, United States Code, Section 1001(a))

COUNTS 18- 41

Possession and Use of a Firearm in Connection with a Crime of Violence

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the General Allegations and the overt acts listed in Count One of this Indictment.
  
2. On or about the following dates, in Fairfax County in the Eastern District of Virginia and elsewhere as identified below, defendants RANDALL TODD ROYER, MASOUD AHMAD KHAN, IBRAHIM AHMED AL-HAMDI, MOHAMMED AATIQUE, SEIFULLAH CHAPMAN, HAMMAD ABDUR-RAHEEM, DONALD THOMAS SURRETT, CALIPH BASHA IBN ABDUR-RAHEEM, KHWAJA MAHMOOD HASAN, SABRI BENKHALA, and YONG KI KWON, did knowingly use, carry, possess and discharge firearms as identified below, during, in relation to, and in furtherance of crimes of violence for which the defendants may be prosecuted in a court of the United States, as described below:

<u>Count</u>	<u>Defendants</u>	<u>Date</u>	<u>Firearm</u>	<u>Location</u>	<u>Possessed, Carried, Used, Discharged</u>
18.	Abdur-Raheem Caliph Basha	January 10, 2000	AK-47-style rifle	Fairfax, VA	possessed
19.	Abdur-Raheem Surratt	January 29, 2000	Saiga 7.62 semi-auto rifle	Forestville, MD	possessed
20.	Abdur-Rahmeem	Feb 24, 2000	AK-47-style rifle	Fairfax, VA	used and discharged
21.	Surratt	Feb 24, 2000	AK-47-style rifle	Fairfax, VA	used and discharged
22.	Caliph Basha	March 9, 2000	AK-47-style rifle	Fairfax, VA	used and discharged
23.	Royer	April 2000	AK-47-style rifle	Pakistan	used and discharged
24.	Al-Hamdi	May 6, 2000	AK-47-style rifle	Fairfax, VA	used and discharged
25.	Khan	mid- 2000	AR-15 style rifle	York, PA	used and discharged
26.	Benkhala	August 4, 2000	AK-47-style rifle	Fairfax, VA	used and discharged
27.	Al-Hamdi Royer	September 2000	AK-47-style rifle	Pakistan	used and discharged
28.	Royer Kwon	Sept 17, 2000	AK-47-style rifle	Fairfax	possessed
29.	Chapman	October 6, 2000	AK-47-style rifle	Quantico VA	used and discharged
30.	Hasan	Sept 24, 2000	AK-47-style rifle	Fairfax, VA	used and discharged

Count	Defendants	Date	Firearm	Location	Possessed, Carried, Used, Discharged
31.	Al-Hamdi Chapman	Dec 18, 2000	Saiga .308 rifle	Alexandria, VA	possessed
32.	Royer	Sept 22, 2001	AK-47-style rifle	Alexandria, VA	possessed
33.	Aatique Khan Hasan Royer	October 2001	AK-47-style rifle	Pakistan	used and discharged
34.	Aatique Kwon Khan Hasan Royer	October 2001	12mm antiaircraft gun	Pakistan	used and discharged
35.	Khan Hasan Royer	October 2001	machine gun	Pakistan	used and discharged
36.	Khan Hasan Royer	October 2001	Rocket propelled grenade	Pakistan	used and discharged
37.	Al-Hamdi	Feb 25, 2003	Saiga .308 rifle	Annandale, VA	possessed
38.	Caliph Basha	Mar 24, 2003	AK-47 rifle	Arlington, VA	possessed
39.	Abdur-Raheem	Apr 1, 2003	AK-47-style rifle	Falls Church, VA	possessed
40.	Surratt	May 8, 2003	AK-47-style rifle	Suitland, MD	possessed
41.	Khan	May 8, 2003	AK-47 rifle	Gaithersburg, MD	possessed

(In violation of Title 18, United States Code, Sections 924(c) and 2(a).)

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

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Paul J. McNulty  
United States Attorney

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Gordon D. Kromberg  
David H. Laufman  
Assistant United States Attorneys

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John T. Gibbs  
Department of Justice Trial Attorney