

Expert Report II: U.S. v. MOHAMAD IBRAHIM SHNEWER et al.

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My full name is Evan Francois Kohlmann. I am an International Terrorism Consultant who specializes in tracking Al-Qaida and other contemporary terrorist movements. I hold a degree in International Politics from the Edmund A. Walsh School of Foreign Service (Georgetown University), and a Juris Doctor (professional law degree) from the University of Pennsylvania Law School. I am also the recipient of a certificate in Islamic studies from the Prince Alwaleed bin Talal Center for Muslim-Christian Understanding (CMCU) at Georgetown University. I currently work as an investigator with the Nine Eleven Finding Answers (NEFA) Foundation and as an on-air analyst for NBC News in the United States. I also run an Internet website Globalterroralert.com that provides information to the general public relating to international terrorism. I am author of the book Al-Qaida's Jihad in Europe: the Afghan-Bosnian Network (Berg/Oxford International Press, London, 2004) which has been used as a teaching text in graduate-level terrorism courses offered at such educational institutions as Harvard University's Kennedy School of Government and the Johns Hopkins School of Advanced International Studies (SAIS).

As part of my research beginning in approximately 1997, I have traveled overseas to interview known terrorist recruiters and organizers (such as Abu Hamza al-Masri) and to attend underground conferences and rallies; I have reviewed thousands of open source documents; and, I have amassed one of the largest digital collections of terrorist multimedia and propaganda in the world. The open source documents in my collection include sworn legal affidavits, original court exhibits, video and audio recordings, text communiqués, and eyewitness testimonies. I have testified on four occasions as an expert witness on behalf of the U.K. Crown Prosecution Service (CPS): at Snaresbrook Crown Court in Regina v. Palvinder Singh in 2006; before the High Court in Glasgow in H.M.A. v. Mohammed Atif Siddique in 2007; at the London Central Criminal Court at the Old Bailey in Regina v. Samina Malik in 2007; and, at the London Central Criminal Court (Old Bailey) in Regina v. Hassan Mutegombwa in 2007. I also testified as a fact witness at Woolwich Crown Court in Regina v. Tsouli, Mughal, and Daour in 2007. I have additionally testified as an approved expert witness in United States federal and military courts in eleven criminal cases; including:

- United States v. Sabri Benkhala (Eastern District of Virginia, 2004)
- United States v. Ali Timimi (Eastern District of Virginia, 2005)
- United States v. Uzair Paracha (Southern District of New York, 2005)
- United States v. Ali Asad Chandia (Eastern District of Virginia, 2006)
- United States v. Yassin Aref (Northern District of New York, 2006)
- United States v. Sabri Benkhala (Eastern District of Virginia, 2007)

- United States v. Rafiq Sabir (Southern District of New York, 2007)
- United States v. Emadeddine Muntasser (District of Massachusetts, 2007)
- United States v. Hassan Abu Jihaad (District of Connecticut, 2008)
- United States v. Mohammed Amawi et al. (Northern District of Ohio, 2008)
- United States v. Salim Hamdan (Guantanamo Bay Military Tribunal, 2008)

In United States v. Uzair Paracha, Federal District Judge Sidney Stein held a Daubert hearing on my qualifications as an expert witness and issued a ruling concluding: “Evan Kohlmann has sufficient education, training, and knowledge to be qualified as an expert, and... Kohlmann’s methodology—that is, his process of gathering sources, including a variety of original and secondary sources, cross-checking sources against each other, and subjecting his opinions and conclusions to peer review—is sufficiently reliable to meet the standards for admissibility of expert testimony set by the Federal Rules of Evidence.”

Likewise, in United States v. Hassan Abu Jihaad, Federal District Judge Mark Kravitz held a Daubert hearing on my qualifications as an expert witness and issued a ruling concluding, “Mr. Kohlmann is certainly qualified to provide expert testimony... Mr. Kohlmann is qualified by means of his education, training, background, and experience to testify as an expert on terrorism... Mr. Kohlmann has conducted first-hand interviews of several leaders of terrorist organizations and has reviewed reams of information about al Qaeda... and the other subjects on which he will offer testimony. Indeed... it is apparent that these subjects are Mr. Kohlmann’s life work, and he has, therefore, acquired a considerable amount of information and documentation on these subjects... Mr. Kohlmann’s work receives a considerable amount of peer review from academic scholars and others, and by all accounts, Mr. Kohlmann’s work is well regarded.”

In June 2008, I was asked by the U.S. Attorney’s Office for the District of New Jersey to review the contents of two computer hard drives preserved in FTK/E01 digital forensic format and labeled respectively as follows: “QPH1_1” (hereinafter referred to as “Dell Desktop from Duka”) and “Dell Inspiron SN DJ” (hereinafter referred to as “Shnewer’s Laptop”). After reviewing these contents, I was further requested to produce an initial expert report identifying a number of terms, individuals, and organizations cited in these materials, and the relevance of these materials to the recruitment of Western nationals for extremist political and religious causes. Following my initial review, I was asked to produce a second comprehensive analysis of these materials and, separately, fourteen transcripts of consensual audio recordings. Upon my complete review, I have recognized many items significant to me as published by international terrorist organizations and their supporters. I also note a series of obvious references in the audio transcripts provided to me by the USAO to those same explicit items and the troubling content depicted therein. I further conclude that this material is very likely to be useful to a person or persons attempting to join a terrorist organization or preparing an act of terrorism, insofar that:

- It communicates the general aims and ideology of Al-Qaida and affiliated groups to a wide, global audience.

- It further communicates specific instructions and guidance on the use of Al-Qaida's preferred military tactics such as assassinations, kidnappings, and suicide bombings.
- It fosters a sense of organization and purpose for isolated extremists living in Western countries who are drawn towards joining Al-Qaida.
- It encourages even those who have no direct connection to Al-Qaida to join its cause and execute military operations on its behalf around the world, including the use of suicide bombings.

I. INITIAL DEFINITIONS

- **Jihad/Mujahideen**

Jihad is an Arabic word meaning “holy struggle.” In the modern context, it has become increasingly used in a militaristic context meaning “holy war.” Mujahid is an Arabic term—based on the root word jihad—meaning “holy warrior.” The plural form of mujahid is mujahideen or mujahidun (meaning “holy warriors”).

- **Shaheed/Shuhada**

Shaheed is an Arabic word meaning “martyr”—referring to an individual who has been killed while serving the cause of Islam. According to Muslim religious texts, those who are martyred in the cause of their faith are promised a variety of rewards, including immediate entry to paradise for both the martyr and his extended family. The plural form of shaheed is shuhada (meaning “martyrs”).

- **Al-Qaida**

Al-Qaida, meaning “The Base” or “The Solid Foundation”, is an international terrorist organization founded by Saudi exile Usama Bin Laden, Egyptian exile Dr. Ayman al-Zawahiri, and a group of other likeminded foreign mujahideen fighting in Afghanistan in approximately September 1988. The general mission of Al-Qaida is to overthrow the current political regimes in control of the Muslim world, to eject the presence and influence of Westerners and Western governments from the Muslim world, and to re-establish a greater Caliphate, or Islamic Empire, in the vacuum. In order to achieve these goals, Al-Qaida has endorsed a methodology that is nearly exclusively based upon the use of violence: assassinations, executions, and targeted bombings (most often, suicide bombings). Al-Qaida fighters have participated in armed frontline conflicts that include Afghanistan, Bosnia-Herzegovina, Chechnya, Kashmir, and Iraq. Al-Qaida has also claimed responsibility for a long list of noteworthy terrorist attacks, which include (but are not limited to): the August 1998 suicide bombing attacks on two U.S. embassies in Kenya and Tanzania; the October 2000 suicide bombing attack on the U.S.S. Cole off the coast of Yemen; the September 11, 2001 suicide hijackings in the United States; the October 2002 suicide bombing attack on the French supertanker Limburg off the coast of Yemen; and, the July 7, 2005 suicide bombing attacks in London. Al-Qaida has been officially named by the U.S. government as a Specially

Designated Foreign Terrorist Organization (FTO), making it illegal to provide Al-Qaida with material support, advice, or assistance.

- **Usama Bin Laden**

Usama Bin Mohammed Bin Laden, originally from Saudi Arabia, is the Emir, or senior commander, of Al-Qaida. He has held that position since Al-Qaida was first established in approximately September 1988. Bin Laden often appears as a speaker in Al-Qaida propaganda recordings, and has played a direct role in the planning and execution of terrorist attacks targeting the United States and U.S. interests abroad. The U.S. government has named Bin Laden as a Specially Designated Global Terrorist (SDGT), making it illegal to provide him with material support, advice, or assistance.

- **Dr. Ayman al-Zawahiri**

Dr. Ayman al-Zawahiri, originally from Egypt, serves as the Deputy Emir, or deputy commander, of Al-Qaida. He has held that position since approximately February 1998, when he merged his own Egyptian Islamic Jihad (EIJ) organization with Bin Laden under the banner of Al-Qaida's "World Islamic Front Against Jews and Crusaders." (The EIJ has separately been named by the U.S. government as a Specially Designated Foreign Terrorist Organization (FTO).) Al-Zawahiri often appears as a speaker in Al-Qaida propaganda recordings, and has played a direct role in the planning of terrorist attacks targeting the United States and U.S. interests abroad. Likewise, the U.S. government has also personally named Dr. al-Zawahiri as a Specially Designated Global Terrorist (SDGT), making it illegal to provide him with material support, advice, or assistance.

II. THE TREND OF DECENTRALIZED TERRORISM / HOMEGROWN TERRORISM

For almost a decade between 1991 and 2001, Saudi exile Usama Bin Laden worked tirelessly to build a new militant alliance known as Al-Qaida from the very foundation. Much of his efforts were often expended on consolidating leadership, training, and financial assets that had previously been divvied up amongst a variety of different sub-entities such as Al-Gama`at al-Islamiyya (the Egyptian Islamic Group), the Egyptian Islamic Jihad Movement, Jemaah Islamiya in Indonesia, and beyond. According to founding Al-Qaida Shura Council member Mamdouh Mahmud Salim (a.k.a. Abu Hajer al-Iraqi), "Abu Abdullah [Bin Laden] had tendency to favor a policy of centralization... and felt obligated to assemble the Arabs in one location, train and prepare them to be a single mobilized fighting brigade."¹ As a result, by September 2001, even some semi-autonomous Arab training camps in Afghanistan were closed

¹ Muhammad, Basil. *Al-Ansaru l'Arab fi Afghanistan*. The Committee for Islamic Benevolence Publications; ©1991. Page 199.

down by the Taliban in deference to other local facilities directly overseen by Al-Qaida and the Taliban.²

However, Bin Laden had apparently overestimated the importance of group centralization, neglecting the benefits afforded to him by Al-Qaida's loose, amalgamated infrastructure. Already by the late 1980s, those around Bin Laden warned him that their attempts to create strict administration and hierarchy within Al-Qaida were ending in disaster. Mamdouh Salim—appointed by Bin Laden to assist him in the regimentation of the Arabs in Afghanistan—admitted in mujahideen memoirs, “we tried our best to correct the brothers, but I should admit that... I was mistaken about the task of management. I thought of people what I had read about them in books—if you were to say to someone, ‘Fear Allah’, then that’s fine, he would fear Allah! ...I believed that just like I could flip a switch to make a light turn on and off, I could also similarly handle people!”³ After a short period of time, Salim grew so exasperated that he offered his resignation to Bin Laden as chief administrator of his nascent organization.

Bin Laden also failed to fully grasp how the relative “openness” of his movement and the perceived lack of hierarchy appealed to young jihadist recruits. In the world of Al-Qaida and the Arab-Afghans, even the most junior of operatives could potentially gain high status within the organization by either demonstrating useful skills, or else by volunteering to sacrifice themselves on behalf of the mission. In other words, Al-Qaida offered an equal opportunity at fame and recognition to nearly any sympathetic soul willing to risk death or imprisonment. When agents from the U.S. Federal Bureau of Investigation (FBI) apprehended a junior Al-Qaida operative who helped build the suicide truck bombs used to attack two U.S. embassies in East Africa in 1998, he boasted of his own role in the plot and explained that he “was attracted to Usama Bin Ladin and the group Al Qaeda because it did not matter what nationality you were” and because Al Qaeda members did not explicitly follow “orders from a chain of command” in the same way as more traditional terrorist organizations.⁴

Faced with a resounding defeat on the peaks of Tora Bora on the Afghan-Pakistani border, a group of high-ranking Al-Qaida commanders decided to re-think Al-Qaida's military campaign against the West. In 2002 and 2003, Bin Laden's shift in strategy became noticeable following a series of dramatic kamikaze bombing attacks targeting Westerners in a host of countries, from Indonesia to Morocco. Al-Qaida's then-official website—the Al-Neda Center for Islamic Studies and Research—published a landmark book by an Al-Qaida leader in Saudi Arabia named Shaykh Yousef al-Ayyiri acknowledging that these attacks marked a new phase in evolution for Al-Qaida. According to al-Ayyiri, “the al-Qaidah Organization has adopted a strategy in its war with the Americans based on expanding the battlefield and exhausting the enemy, who spread his interests over the globe, with successive and varied blows... Expanding the battlefield has invaluable benefits. The enemy, who needed to protect his country only,

² “Testimony of Detainees Before the Combatant Status Review Tribunal.” U.S. Defense Department Combatant Status Review Tribunal (CSRT) and Administrative Review Board (ARB) documents released on March 3, 2006. Page 66. http://www.defenselink.mil/pubs/foi/detainees/csrt/Set_1_0001-0097.pdf.

³ Muhammad, Basil. *Al-Ansaru l'Arab fi Afghanistan*. The Committee for Islamic Benevolence Publications; ©1991. Page 196.

⁴ Government Exhibit GX-6 (Interview of Mohammed Sadiq Odeh by FBI Agent John Anticev). *U.S. v. Usama Bin Laden, et al.* S(7) 98 Cr. 1023 (LBS). United States District Court, Southern District of New York.

realized that he needed to protect his huge interests in every country. The more diversified and distant the areas in which operations take place, the more exhausting it becomes for the enemy, the more he needs to stretch his resources, and the more he becomes terrified.”⁵

In the wake of 9/11, Al-Qaida recruiters in Europe who had previously encouraged others to travel to mujahideen training camps in Afghanistan, Bosnia-Herzegovina, and Chechnya began radically changing their message. Their new philosophy emphasized the individual nature and responsibility of jihad. At a conference in Leicester organized by the radical Al-Muhajiroun faction in October 2002, Abu Hamza al-Masri (a.k.a. Mustafa Kamel) admonished his audience, “We need to resist, we need to fight, even alone. And you can’t go now to learn in Afghanistan or Eritrea as before. Now, a war zone is a war zone. There is no need for camping, there is no facilities for camping... A lot of the skills you need for the frontline, you can learn from here... Where are you? What can you do in your area?”⁶ Al-Muhajiroun leader Shaykh Omar Bakri Mohammed echoed these comments and added, “the Ummah [should] know it is obligatory upon them to engage in... preparation and to engage in the jihad. And each one must find their own way. There is no need yourself to contact somebody here or there. You find your own way! Sincerely, you will get it. You do not want to put someone else in trouble. You, look for yourself! ...Seek it! You will get it!”⁷

Given the situation on the battlefield, Al-Qaida no longer had the luxury of importing large numbers of unskilled operatives into Afghanistan solely for the purpose of training, only to then immediately export them elsewhere. With the Afghan camps closed and Al-Qaida recruiters emphasizing the need for self-financed, self-trained, and self-motivated terrorist cells, Bin Laden’s aides began ardently working to spread their collective knowledge, insights, and practical skills to the public at large. According to a widely respected Al-Qaida online theorist who goes by the pseudonym “Louis Atiyatullah”, the advantage of such a strategy is that “collective organized work is not affected by the loss of individuals, because individuals are easily replaced with others. The organization exists not on any individual; rather it operates as number of distributed responsibilities where the loss of individuals is redundant. This is one of the secrets of the effectiveness of Al-Qaida and their success in group operations.”⁸

Amidst a global law enforcement clampdown on suspected terrorists, the constantly-evolving Internet was virtually the only means of communication with the necessary reach and ability to transmit such illicit material. The Internet also offered Al-Qaida a unique medium through which it could safely interface with potential operatives without immediately compromising both the recruits and recruiters (as had happened previously when using fax machines and satellite telephones). As FBI Director Robert Mueller recently acknowledged during a speech before an audience at the Council on

⁵ Al-Neda Center for Islamic Studies and Research. “The Operation of 11 Rabi al-Awwal: The East Riyadh Operation and Our War With the United States and its Agents.” August 2003. Translated into English by the United States Foreign Broadcast Information Service (FBIS).

⁶ Speech given at “Iraq Today Mecca Tomorrow.” National Conference held in Leicester, United Kingdom; organized by Al-Muhajiroun, P.O. Box 349 London N9 7RR. October 27, 2002.

⁷ Speech given at “Iraq Today Mecca Tomorrow.” National Conference held in Leicester, United Kingdom; organized by Al-Muhajiroun, P.O. Box 349 London N9 7RR. October 27, 2002.

⁸ Atiyatullah, Louis. “The Badr Al-Riyadh Tape: A Well Organized Al-Qaida’s Media Strategy Revealed.” The Global Islamic Media Centre (GIM). 2004. Page 2.

Foreign Relations, “the information age means you don’t need training camps to become a terrorist; all you need is an Internet connection. The web is terrorism’s new frontier, offering both persuasive inspiration and practical instruction.”⁹ In fact, these “homegrown” terrorist cells come at essentially zero cost to Al-Qaida. They are often fanatically loyal to the public orders of Al-Qaida military commanders like Usama Bin Laden and Abu Musab al-Zarqawi. Moreover, they are already placed in (and are familiar with) far-off countries which are prime targets for Al-Qaida terrorist attacks. Rather than struggling as an organization to infiltrate U.S. homeland security with highly-trained human operatives who can be easily thwarted, Al-Qaida can instead spread uncontrolled like an ideological virus—brainwashing sympathetic fanatics around the world who, if properly motivated, might stand at a chance of achieving deadly results all on their own. By abandoning the strict hierarchical system favored early on by Bin Laden and adopting a more flexible and decentralized approach, Al-Qaida has been granted access to a much greater range of potential “undiscovered young talent” who can be mobilized into action using cheap and reasonably secure technologies like the Internet.

Beyond mere written propaganda and explicit training manuals, influential Al-Qaida commanders have also used the Internet in other ways designed to incite sympathetic individuals to form “homegrown” terrorist networks—most notably, with sophisticated, Hollywood-worthy digital video recordings (which are often subtitled in English to specifically reach a Western audience). In a recent public report on homegrown radicalization, the New York Police Department warned of extremist organizations serving as “indoctrination accelerants” by “us[ing]... the English language as well as the internet [to] amplify[y] their message and... resonate with 2nd and 3rd generation Muslims in the West, many of whom speak or read little, if any Arabic.” According to the NYPD, the use of such tactics by a terrorist organization allows it to “successfully recruit, indoctrinate, and train aspiring extremists.”¹⁰

III. THE AS-SAHAB MEDIA FOUNDATION

In approximately mid-2000, in recognition of the growing importance of audiovisual propaganda, Al-Qaida established its own corporate entity responsible for producing “official” multimedia releases from Usama Bin Laden and other prominent terrorist commanders hiding in Afghanistan: the As-Sahab Media Foundation. In recent testimony before a U.S. Department of Defense Combatant Status Review Tribunal, Al-Qaida organizational planner Khalid Sheikh Mohammed has admitted serving as the “Media Operations Director” at the As-Sahab Foundation.¹¹ In order to help with editing and translating the videos into English, Khalid Sheikh Mohammed employed other technically-skilled individuals, such as American Al-Qaida operative Adam Gadahn (a.k.a. Azzam al-Amriki). During an official video recording released in September

⁹ Council on Foreign Relations (CFR). Prepared Remarks by the Director of the Federal Bureau of Investigation (FBI) Robert S. Mueller III. September 28, 2007.

http://www.cfr.org/publication/14323/prepared_remarks_by_the_fbis_robert_mueller.html.

¹⁰ New York Police Department (NYPD). “Radicalization in the West: The Homegrown Threat.” Prepared by Mitchell D. Silber and Arvin Bhatt. NYPD Intelligence Division. Page 72.

¹¹ http://www.defenselink.mil/news/transcript_ISN10024.pdf. Page 17.

2005, Gadahn explained the role of As-Sahab's multimedia in recruiting new Al-Qaida members:

“Allah is our witness that the numerous audio and videotapes issued by Shaykh Usama Bin Laden, Dr. Ayman al-Zawahiri, and other leaders of the jihad have not been released merely to dispel rumors of their death—or, as the Americans once ridiculously claimed, to send coded messages to their followers. No, these communiqués have been released to explain and propound the nature and goals of the worldwide jihad against America and the crusaders, and to convey our legitimate demands to friend and foe alike, so that the former may join us on this honorable and blessed path...”¹²

Throughout the evidence provided to me gathered through the use of consensual hidden recordings, there is a clear understanding of the origins and mission of the As-Sahab Media Foundation. On April 28, 2006, Mohamed Shnewer was specifically asked by a cooperating witness what As-Sahab was: “What kind of company is this, bro?” Shnewer replied, “it belongs to Al-Qaeda.”¹³

A complete review of the preserved contents of two computers provided to me by the U.S. Attorney's Office for the District of New Jersey has revealed forensic records for a wealth of material produced by the As-Sahab Media Foundation, including (but not limited to) the following:

- **As-Sahab Media Foundation – “State of the Ummah” (a.k.a. “The Destruction of the U.S.S. Cole”)**¹⁴

The computer hard drive marked as “Shnewer's Laptop” contains at least three separate high-resolution copies of the first part of As-Sahab's landmark first video release from 2001, “The State of the Ummah” (a.k.a. “The Destruction of the U.S.S. Cole”). The video—subtitled entirely in English—opens by explaining its purpose: to reveal the “illnesses” of the Muslim nation and then “to describe the cure, whilst giving... encouragement to remain firm and be steadfast for the sake of the future generation.” After bombarding viewers with relentless scenes of conflict and bloodshed in various Muslim countries, “State of the Ummah” presents what it advertises as “The Solution”: actual military training courses held at Al-Qaida camps in Afghanistan, including Al-Farouq and Tarnak Farms. The video covers various aspects of this training in depth—including mujahideen calisthenics, urban warfare tactics, and even shoulder-fired Surface-to-Air missiles. As mujahideen practice mock assassinations of world leaders (including former U.S. President Bill Clinton), they are lectured by senior Al-Qaida military commanders in the underlying purpose of this training:

¹² As-Sahab Media Foundation. “A Message to the People of the West from the fighting brother Azzam the American on the Fourth Anniversary of the Battles of New York and Washington.” <http://www.as-sahaab.com>. MPEG Video; 12 minutes in length. November 6, 2005.

¹³ Transcript of Monitored Conversation. April 28, 2006. Filename: 4-28-06-CW1-a.m.-Full.

¹⁴ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\State-of-the-ummah1.ram; \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\My Documents\My Videos\19\19V~1.VOB; \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\My Documents\New Folder\VTS_01_1.VOB.

“My beloved brothers—Allah has ordained upon us a great obligation... our goal is to humiliate the enemies of the Muslim Ummah, and to degrade the tyrant idols and the worshippers of the grandsons of apes and pigs... Dear brothers, you are raising the banners of brothers who gave their souls for the cause of Allah... My dear brothers, here, we are preparing ourselves to avenge them and retaliate for their blood that was spilled to please the apes and pigs—America and the Jews. Here, we are preparing to tell the world, ‘we are coming.’”

On April 28, 2006, in a conversation with a cooperating witness, Mohamed Shnewer offered to share his copy of the video “State of the Ummah” (a.k.a. “The Destruction of the U.S.S. Cole.” Shnewer explained, “Yeah. This is the tape I wanted you to watch. I think you should watch this. The video I am showing you now, you can show it to your wife. Why? Because it shows that everything happening has a cause. Everything has a cause... This one USS. It talks about when they hit USS Cole.”¹⁵ During a second subsequent conversation recorded on October 22, 2006, Shnewer again discusses the “State of the Ummah” video with a cooperating witness who complains that “he doesn’t have the thing in English. He can’t find it.” Shnewer thereupon promises to “create another file, and separate the ones with the English subtitles.”¹⁶

- **As-Sahab Media Foundation – “The Will of Ahmad al-Haznawi”¹⁷**

This video, produced by Al-Qaida’s official As-Sahab Media Wing, was first aired exclusively on the Al-Jazeera Arabic-language satellite television network in April 2002 and was later subtitled in English and distributed in its entirety via the Internet and Islamic bookstores in Europe. The video consists primarily of 9/11 suicide hijacker Ahmed al-Haznawi speaking in front of a backdrop of the World Trade Center in flames. In his final recorded words, al-Haznawi explains:

“So until now, there has been no direct confrontation with the head of infidelity, America. As a result, we began thinking of how to reach them... we found no solution and no cure other than carrying out Martyrdom Operation against the enemy’s interests, citizens, and soldiers. These operations’ impact and effectiveness has been observed through the attacks on the American Embassies in Nairobi and Dar As-Salaam and the attack on the American destroyer in Aden... so I have gone out to fight the enemies of Allah – the Americans – anywhere possible, including fighting and killing them in their own land. For I seek martyrdom and strive to attain it, but only after strengthening my religion and slaughtering my enemies.”¹⁸

Not only did the computer hard drive marked as “Shnewer’s Laptop” contain a high-resolution copy of “The Will of Ahmad al-Haznawi”—stored in a Windows Desktop folder created by user account “mohamed shnewer”—but moreover, Windows

¹⁵ Transcript of Monitored Conversation. April 28, 2006. Filename: 4-28-06-CW1-a.m.-Full.

¹⁶ Transcript of Monitored Conversation. October 22, 2006. File Number: 315N-PH-100652. Filename: \1022006-1722-CW2(Done-MAH).

¹⁷ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\911-will-ahmad-alhaznawi.mpg.

¹⁸ As-Sahab Media Foundation. “The Wills of the Martyrs of New York & Washington.” April 2002.

system records indicate that a user logged in under the “mohamed shnewer” account had recently accessed and played this same video.¹⁹

- **As-Sahab Media Foundation – “The Will of Abdelaziz al-Omari”²⁰**

The second of the 9/11 hijacker videos to be released, “The Will of Abu al-Abbas al-Junoobi”, was distributed by As-Sahab on the first anniversary of 9/11 in September 2002. After a lengthy audio recording of Usama Bin Laden and other Al-Qaida leaders paying tribute to the 9/11 hijackers, the “martyr” Abdelaziz al-Omari is shown speaking in front of images of the damaged Pentagon in Washington D.C.: “May Allah reward those who trained me on this path & have been instrumental in this great work. I mention in particular the Mujahid leader Shaykh Usama bin Muhammad bin Ladin – may Allah protect him from the plots of the plotters... May Allah place this act with his good deeds and reward him well on our behalf.”²¹

Some sections of As-Sahab’s “The Will of Abu al-Abbas al-Junoobi” feature English narration by a youthful-sounding voice with an American accent (later identified as that of California native-turned Al-Qaida spokesman Adam Gadahn). Speaking on the videotape, Gadahn heaped praise on al-Omari:

“So the free and independent scholar went out as an emigrant and mujahid in Allah’s cause and refused to sit with the sedentary and refused to be a mouthpiece for the wrongdoers. He travelled to Afghanistan where Islam is supreme and men are made. The hero undertook his military training with determination and diligence... He carried both the burden of his wounded Ummah and a burning desire for martyrdom after slaughtering the enemy. And by the Grace of Allah his desire was fulfilled. He was selected to be included in the rank of the squadrons that would carry out the attacks on New York and Washington. He and his brothers soon began taking the exclusive courses that would prepare them for the operations and all worked studiously to acquire the most knowledge possible and overcome the obstacles before them including foreign languages and the complicatedness of contemporary science in pursuit of their goal, the destruction of the idol of modern times, America. We must note the brotherly, faith filled atmosphere in which the heroes of the raids in New York and Washington lived in the martyrs house in Kandahar... The heroes continued the special courses seeking aid from Allah Alone... So, to the grandsons of Sa’ad, Khalid and al-Muthanna, we say, enough fun and games. Arise and follow the footsteps of these heroes and destroy the remnants of this idol America. Arise and lead your Ummah out of this wilderness and give victory to this religion as these heroes did. These heroes were not 19 armies from 19 countries but rather were 19 mujahideen who were true to Allah so He was true to them.”²²

On April 28, 2006, Mohamed Shnewer was recorded during a conversation with a cooperating witness, at which time he played a copy of the video “The Will of Abu al-Abbas al-Junoobi” for the witness. Shnewer commented, “this one ... This one, this one,

¹⁹ \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Recent\911-will-ahmad-alhaznawi.lnk.

²⁰ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\My Documents\My Videos\19\VTS_01_1.VOB.

²¹ As-Sahab Media Foundation. “The Will of Abu al-Abbas al-Junoobi.” September 2002.

²² As-Sahab Media Foundation. “The Will of Abu al-Abbas al-Junoobi.” September 2002.

do you know what is it about? ...It's from 911. It's the last will and testament of one of the nineteen [19]... This one is - - This one ... This one you should watch alone... Watch it alone... This is one of the nineteen -- his last will and the testament -- this one is [UI] ... you should see it... [Watch it] by yourself; this one, he had the Koran memorized. Uh, look, how they are planning... This was brought to me by a person who was overseas... It appeared on Al-Jazeera... but not all of it.”²³ Clearly, Shnewer is referring to the specific version of the video stored in a folder marked “19” within his “My Documents” cache on his laptop. Shnewer is even recorded as he explains the process for extracting “The Will of Abu al-Abbas al-Junoobi” from the folder “19” on the laptop: “You have to go through three different files... There it is... Then you have to click on this... Nineteen... After Nineteen this: ...VTS01.”²⁴

- **As-Sahab Media Foundation – “The Will of Saeed al-Ghamdi”**²⁵

The third release in the continuing series of 9/11 “martyrdom” videos produced by As-Sahab, “Al-Mu’taz Billah: The Last Will & Testament”, was first released in Arabic in September 2003, and later was translated and subtitled into English. The video features footage of 9/11 hijacker Saeed al-Ghamdi (a.k.a. “al-Muataz Billah”). During the video, al-Ghamdi admonishes fellow Muslims:

“We surely know, by Allah, that there is no way for the Ummah to get out of what it is in except by establishing Jihad... Jihad becomes individually incumbent upon every Muslim... The enemies of Islam from the Jews and Christians and others, we find them like the tentacles of an octopus whose head represents America. And we find them like branches of a trunk that represents America. So, America, may Allah destroy it, is the one to which the descendants of apes and swine (Jews) whisper... So every Muslim must fight these impure Jewish and Crusader occupiers, especially the Americans.”²⁶

- **As-Sahab Media Foundation – “The Knight’s Will of the London Blast”**²⁷

In September 2005, the As-Sahab Foundation released a new video titled, “The Knight’s Will of the London Blast”, featuring the “martyrdom will” of Mohammed Siddique Khan—the lead suicide bomber responsible for the July 7, 2005 Al-Qaida terrorist attacks in London.²⁸ The film was produced by the As-Sahab Media Foundation

²³ Transcript of Monitored Conversation. April 28, 2006. Filename: 4-28-06-CW1-a.m.-Full.

²⁴ Transcript of Monitored Conversation. May 26, 2006. Filename: 5-26-06-CW1-Full.

²⁵ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\911-will-saeed-al-ghamdi-2.ram.

²⁶ As-Sahab Media Foundation. “Al-Mu’taz Billah: The Last Will & Testament.” September 2003. Translated into English by the Media-HQ News Agency.

²⁷ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Local Settings\Temp\Temporary Directory 4 for 120120052.zip\The London Expedition EngSubs.mpg; \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Local Settings\Temp\Temporary Directory 5 for 120120052.zip\The London Expedition EngSubs.mpg; \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Local Settings\Temp\Temporary Directory 6 for 120120052.zip\The London Expedition EngSubs.mpg.

²⁸ As-Sahab Media Foundation. “The Knight’s Will of the London Blast.” <http://www.as-sahaab.com>. MPEG Video. November 6, 2005.

in order for Al-Qaida to officially claim responsibility for the 7/7 bombings. It includes recorded statements by Al-Qaida deputy commander Dr. Ayman al-Zawahiri and 7/7 suicide bomber Mohammed Siddique Khan. Zawahiri states in the video, “The lands and interests of the states that took part in the aggression on Palestine, Iraq and Afghanistan are considered targets for us, so anybody who seeks peace should stay away from these states... Blair has brought catastrophes to his people in the middle of the capital, and will bring more, God willing.” This is followed by a “martyrdom will” read by Khan: “I am going to keep this short and to the point, because it’s all been said before by far more eloquent people than me. But our words have no impact upon you, therefore I’m going to talk to you in a language that you understand. Our words are dead until we give them life with our blood... I and thousands like me are forsaking everything for what we believe. Our driving motivation doesn’t come from tangible commodities that this world has to offer... I am directly responsible for protecting and avenging my Muslim brothers and sisters. Until we feel security, you’ll be our target... We are at war and I am a soldier. Now you too will taste the reality of this situation.”²⁹

The hard drive marked as “Shnewer’s laptop” contains several copies of a 286mb high-resolution English-subtitled version of “The Knight’s Will of the London Blast.” Windows system records for user account “mohamed shnewer” on the same computer appear to indicate that the video was opened in temporary folders and accessed six or more times.³⁰ On April 28, 2006, Mohamed Shnewer was recorded during a conversation with a cooperating witness, during which he played a copy of the video “The Knight’s Will of the London Blast.” Shnewer told the witness: “We’ll watch it while we are sitting... while we are waiting, we can watch something ... This is about... Do you remember what happened in London? ...This is the video [UI]... It was on Al-Jazeera but only the highlights. But, Al-Zawahiri... He is criticizing the Al-Azhar Sheikh... He tells him - He is tells him ‘How dare you?’ He went to Britain to offer condolences to the families of the victims.”³¹ Shnewer discusses various sections of the video as they appear on screen, pointing out, “[UI] this is an AK-47 that you mount to a grenade launcher... Kalashnikov... It used to have a bayonet.”³² Shnewer is asked by the witness why Al-Qaida would aim for innocent civilians in buses and trains, as opposed to a British government or military target. He responded, “London... it’s hard, is more difficult than here, all the streets. All the streets of London are filled with cameras. ... London is the most difficult... And Israel is more difficult than London... America is very easy, easy.”³³

²⁹ As-Sahab Media Foundation. “The Knight’s Will of the London Blast.” <http://www.as-sahaab.com>. MPEG Video. November 6, 2005.

³⁰ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Local Settings\Temp\Temporary Directory 4 for 120120052.zip\The London Expedition EngSubs.mpg; \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Local Settings\Temp\Temporary Directory 5 for 120120052.zip\The London Expedition EngSubs.mpg; \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Local Settings\Temp\Temporary Directory 6 for 120120052.zip\The London Expedition EngSubs.mpg.

³¹ Transcript of Monitored Conversation. April 28, 2006. Filename: 4-28-06-CW1-a.m.-Full.

³² Transcript of Monitored Conversation. April 28, 2006. Filename: 4-28-06-CW1-a.m.-Full.

³³ Transcript of Monitored Conversation. April 28, 2006. Filename: 4-28-06-CW1-a.m.-Full.

- **As-Sahab Media Foundation – Message from Azzam al-Amriki (September 2005)**³⁴

On the same day in September 2005 as “The Knight’s Will of the London Blast”, the As-Sahab Media Wing also distributed copies of a second propaganda film featuring an English-language lecture by Al-Qaida spokesman Adam Gadahn (a.k.a. “Azzam al-Amriki”) on the fourth anniversary of 9/11.³⁵ Gadahn explained (while speaking in English) the role of As-Sahab’s multimedia in recruiting new Al-Qaida members:

“Allah is our witness that the numerous audio and videotapes issued by Shaykh Usama Bin Laden, Dr. Ayman al-Zawahiri, and other leaders of the jihad have not been released merely to dispel rumors of their death—or, as the Americans once ridiculously claimed, to send coded messages to their followers. No, these communiqués have been released to explain and propound the nature and goals of the worldwide jihad against America and the crusaders, and to convey our legitimate demands to friend and foe alike, so that the former may join us on this honorable and blessed path...”³⁶

Fingering an automatic weapon, Gadahn also added the following comments, swearing revenge on his own former hometown: “Yesterday, London and Madrid. Tomorrow, Los Angeles and Melbourne [Australia], God-willing... We love peace, but when the enemy violates that peace or prevents us from achieving it, then we love nothing better than the heat of battle, the echo of explosions, and [slitting] the throats of the infidels. When it comes to defending our religion, our freedom, and our brothers in faith, every one of us is Mohammed Atta. Every one of us is Jamal Lindsey, and every one of us is Mohammed Boieri.”³⁷

Logs kept by RealPlayer video software installed on the hard drive marked as “Dell Desktop from Duka” for user account “Elvis” indicate that the September 2005 video message from Adam Gadahn produced by As-Sahab had recently been played.³⁸

- **As-Sahab Media Foundation - “Knowledge is For Acting Upon”**³⁹

“Knowledge is For Acting Upon” was first released on the Internet by the As-Sahab Media Foundation on September 10, 2006.⁴⁰ The 91-minute video, divided into

³⁴ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\Azzam-alameriki_high.ram; \QPH1_1\D\Documents and Settings\Elvis\Application Data\Real\RealPlayer\History\Azzam-alameriki.lnk;

³⁵ As-Sahab Media Foundation. “A Message to the People of the West from the fighting brother Azzam the American on the Fourth Anniversary of the Battles of New York and Washington.” <http://www.as-sahaab.com>. MPEG Video; 12 minutes in length. November 6, 2005.

³⁶ As-Sahab Media Foundation. “A Message to the People of the West from the fighting brother Azzam the American on the Fourth Anniversary of the Battles of New York and Washington.” <http://www.as-sahaab.com>. MPEG Video; 12 minutes in length. November 6, 2005.

³⁷ As-Sahab Media Foundation. “A Message to the People of the West from the fighting brother Azzam the American on the Fourth Anniversary of the Battles of New York and Washington.” <http://www.as-sahaab.com>. MPEG Video; 12 minutes in length. November 6, 2005.

³⁸ \QPH1_1\D\Documents and Settings\Elvis\Application Data\Real\RealPlayer\History\Azzam-al-ameriki.lnk.

³⁹ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\Knowledge_Is_For_Acting_Upon.wmv; Knowledge_Is_For_Acting_Upon_Part2.wmv.

two parts and subtitled entirely in English, purports to document in detail the inside history of the 9/11 terrorist attacks in the United States from the perspective of Al-Qaida—including never before seen footage of key 9/11 conspirators such as Ramzi Binalshibh and the personal accounts of important Al-Qaida figures, including Dr. Ayman al-Zawahiri and Adam Gadahn. As Binalshibh and former Al-Qaida military commander Abu Hafis al-Masri are shown meeting with Usama Bin Laden inside Afghanistan, an unidentified narrator explains, “Planning for Sept. 11 did not take place behind computer monitors or radar screens, nor inside military command and control centers”—rather, it was accomplished while “surrounded with divine protection in an atmosphere brimming with brotherliness... and love for sacrificing life.” The video is so specific that it even features extended footage of Al-Qaida operatives practicing using box cutters and small knives to disable fellow passengers in order to hijack a commercial airliner. Both Windows system records and logs kept by RealPlayer video software stored for user account “mohamed shnewer” on the hard drive marked as “Shnewer’s laptop” indicate that both sections of the video “Knowledge is For Acting Upon” had been accessed several times.⁴¹

- **As-Sahab Media Foundation – “Qahr-us-Saleeb”⁴²**

In August 2005, the As-Sahab Media Foundation released a new video of mujahideen combat operations in Afghanistan titled “Harb al-Mustadafeen” (“The War of the Oppressed”). Initial excerpts of the mostly Arabic-language Al-Qaida propaganda film were aired (as per usual policy) on the Al-Arabiya satellite network on August 10, 2005. Subsequently, the original video was divided into two sections, the first of which—“Qahr al-Saleeb” (“Crushing the Cross”)—was officially released on the Internet on August 30, 2005.⁴³ This section of the Harb al-Mustadafeen video contains speeches by a number of foreign operatives recruited by Al-Qaida and the Taliban in Afghanistan, including an unidentified French national known as “Salahuddin al-Rumi” urging other young Muslims in his native French language to join the cause:

“What hit the U.S. – in Tanzania, Kenya, and on September 11, and in all subsequent operations – is revenge against America and Israel, the countries that are the most bitter enemies of Islam. America, together with Britain, killed one and a half million Iraqi children over the course of 10 years... We, the mujahideen, swear to the oppressed Muslims, the victims of unlimited and endless barbarism, that we will avenge their martyrs, and that we will slit the throats of the Americans and the Jews... The same goes for their allies, Allah willing. We call upon the victims of the tyrannical and despotic regimes manipulated by their leaders in the US, Europe, and Israel, and all their allies...

⁴⁰ As-Sahab Media Foundation. “Knowledge is for Acting Upon.”

<http://www.alhesbah.org/v/showthread.php?t=84585>. September 10, 2006.

⁴¹ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Application

Data\Real\RealPlayer\History\Knowledge_Is_For_Acting_Upon.lnk; \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Application

Data\Real\RealPlayer\History\Knowledge_Is_For_Acting_Upon_Part2.lnk; \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Recent\Knowledge_Is_For_Acting_Upon_Part2.lnk.

⁴² \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\Qahr-us-saleeb.wmv.

⁴³ <http://www.alhesbah.org/v/showthread.php?t=31057>. August 30, 2005.

to bear witness that they will be the ones who pay the debt for the blood shed by their rulers. Their innocence has led them to the slaughter and to the guillotine. Their wives will be widowed, and their children will be orphaned... We swear that the Jews and the Americans will never have security... An eye for an eye, and a life for a life.”⁴⁴

The Qahr al-Saleeb video also featured a similar message from an English-speaking Taliban fighter known as “Khaled al-Sheikh” (subsequently identified as Australian national Mathew Stewart).⁴⁵ During his address, Stewart boasts of having the honor of being “among the mujahideen, who seek the demise of all false idols.” He goes on to sneeringly threaten the “people of the West”:

“Do not be fooled by the lies of Blair and Bush that you are free nations, for the only freedom that you have is the freedom to be slaves of your whims and desires... The Muslim world is not your backyard. The Muslim world is not Germany, Japan, or South America. The honorable sons and daughters of Islam will not sit down, watching you spread your evil and immorality and infidelity to our land. The honorable sons of Islam will not just let you kill our families in Palestine, Afghanistan, Kashmir, the Balkans, Indonesia, the Caucasus, and elsewhere. It is time for us to be equals – as you kill us, you will be killed; as you bomb us, you will be bombed.”⁴⁶

The hard drive marked as “Shnewer’s laptop” contains a high-resolution version of the video “Qahr-us-Saleeb” that has been subsequently edited to include English subtitles for the portions of the film that are in Arabic, Urdu, and French.⁴⁷ It also includes a high-resolution copy of the second segment of the “Harb al-Mustadafeen” series: “Operation Konar.”⁴⁸ System logs created by the RealPlayer video software for user account “mohamed shnewer” on the hard drive marked “Shnewer’s laptop” indicate that the As-Sahab video “Operation Konar” had recently been played.⁴⁹

- **As-Sahab Media Foundation – “Dr. Ayman al-Zawahiri and Adam Gadahn: An Invitation To Islam”**⁵⁰

On September 2, 2006, the As-Sahab Media Foundation released a new video recording with Dr. Ayman al-Zawahiri and American Al-Qaida spokesman Adam Gadahn titled “An Invitation to Islam. During the video, Gadahn calls upon, “Americans and the rest of Christendom” to “either repent (your) misguided ways and enter into the light of truth or keep your poison to yourself and suffer the consequences in this world and the next”:

⁴⁴ <http://66.159.20.248/tajdeed/tajdeed/QAHER.AL.SALEEB.zip>. August 2005. Timecode: 32:53 – 34:54.

⁴⁵ <http://66.159.20.248/tajdeed/tajdeed/QAHER.AL.SALEEB.zip>. August 2005. Timecode: 27:20 – 29:24.

⁴⁶ <http://66.159.20.248/tajdeed/tajdeed/QAHER.AL.SALEEB.zip>. August 2005. Timecode: 27:20 – 29:24

⁴⁷ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\Qahr-us-saleeb.wmv.

⁴⁸ \Dell Inspiron SN DJ \D\Documents and Settings\mohamed shnewer\Desktop\New Folder\konar.wmv.

⁴⁹ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Application Data\Real\RealPlayer\History\Konar.lnk.

⁵⁰ \Dell Inspiron SN DJ \D\Documents and Settings\mohamed shnewer\Desktop\New Folder\An_Invitation_To_Islam_Zawahiri_Azzam_Sept2_2006.wmv.

“If the Zionist crusader missionaries of hate and counter-Islam consultants like Daniel Pipes, Robert Spencer, Michael Scheuer, Steven Emerson, and yes, even the crusader-in-chief George W. Bush were to abandon their unbelief and repent and enter into the light of Islam and turn their swords against the enemies of God, it would be accepted of them and they would be our brothers in Islam... Why not surrender to the truth? Escape from the unbelieving army and join the winning side. As for those who have expressed their respect and admiration for Islam, and acknowledged that it is the truth and demonstrated the support and sympathy for the Muslims and their causes like George Galloway, Robert Fisk, and countless others, I say to them, isn't it time you stopped sitting on the fence and came over to the side of truth? ...Abandon unbelief and accept the truth.”⁵¹

On October 22, 2006, during a recorded conversation with a cooperating witness, Mohamed Shnewer specifically discussed the As-Sahab video “An Invitation to Islam.” He explained, “there is this one video where Ayman Al-Zawahiri, the one, second person in Al-Qaeda... The second guy after Osama Bin Laden... he asked Bush to become a Muslim, to accept Islam... We ask you to become a Muslim. If you do become a Muslim, you become our brother. But if you continue to be an infidel, you will be our worst enemy. We'll keep fighting, no problem. [Laughter] Yeah this is how the prophet peace be upon him, before any war he used to send a letter... accept Islam. If you don't want to accept Islam... You have to pay the jizyah [tax , tribute], you have to pay a tax. If you don't want to pay the tax, then we [Ph] will have a fight.”⁵² In addition to the high-resolution copy of “An Invitation to Islam” stored in the “mohamed shnewer” Windows desktop folder on the hard drive marked as “Shnewer's laptop”, logs recorded by RealPlayer video software installed on the drive marked as “Dell Desktop from Duka” indicate that a user operating under account “Elvis” had also recently played the video “An Invitation to Islam.”⁵³

Both the hard drives marked as “Dell Desktop from Duka” and “Shnewer's laptop” contain an impressive collection of additional video recordings produced by As-Sahab and released primarily between December 2005 and September 2006. Those videos include:

- **As-Sahab Media Foundation – “Interview With Dr. Ayman al-Zawahiri on the Fourth Anniversary of the Blessed Raids on New York and Washington”**⁵⁴ (First released by As-Sahab: December 6, 2005)
- **As-Sahab Media Foundation – “Dr. Ayman al-Zawahiri: Obstacles to Jihad”**⁵⁵ (First released by As-Sahab: December 10, 2005)

⁵¹ <http://www.alhesbah.org/v/showthread.php?t=83352>. September 2, 2006.

⁵² Transcript of Monitored Conversation. October 22, 2006. File Number: 315N-PH-100652. Filename: 1022006-1722-CW2(Done-MAH).

⁵³ \QPH1_1\D\Documents and Settings\Elvis\Application Data\Real\RealPlayer\History\An_Invitation_To_Islam_Zawahiri_Azzam_Sept2_2006.lnk.

⁵⁴ \QPH1_1\D\Documents and Settings\Elvis\Local Settings\Temp\Temporary Directory 1 for zawahiri2.zip; \QPH1_1\D\Program Files\Limewire\zawahiri2.zip.

⁵⁵ \QPH1_1\D\Program Files\Limewire\ayman1~1.zip; \QPH1_1\D\Program Files\Limewire\dr ayman speech.zip.

- **As-Sahab Media Foundation – “Dr. Ayman al-Zawahiri: A Letter to America”**⁵⁶ (First released by As-Sahab: January 6, 2006)
- **As-Sahab Media Foundation – “Dr. Ayman al-Zawahiri: To the People of Pakistan”**⁵⁷ (First released by As-Sahab: April 28, 2006)
- **As-Sahab Media Foundation – “The Holocaust of the Americans in the Land of Khurasaan: Raid on an Apostate Base in Khost Province”**⁵⁸ (First released by As-Sahab: June 4, 2006)
- **As-Sahab Media Foundation – “The Holocaust of the Americans in the Land of Khurasaan: Video of the Firing of 3 Rockets at the American Base in Matchadad”**⁵⁹ (First released by As-Sahab: August 12, 2006)
- **As-Sahab Media Foundation – “Dr. Ayman al-Zawahiri: Hot Issues”**⁶⁰ (First released by As-Sahab: September 12, 2006)

Likewise, both hard drives also contain lengthy records—kept by the Windows operating system and RealPlayer video software—documenting how many of these As-Sahab videos were actually being played by users. The “Dell Desktop from Duka” drive indicates that, among others, the following videos were recently accessed by user account “Elvis”: “Dr. Ayman al-Zawahiri: A Letter to America”⁶¹; “Dr. Ayman al-Zawahiri: Obstacles to Jihad”⁶²; “Interview With Dr. Ayman al-Zawahiri on the Fourth Anniversary of the Blessed Raids on New York and Washington”⁶³; “The Holocaust of the Americans in the Land of Khurasaan: Video of the Firing of 3 Rockets at the American Base in Matchadad”⁶⁴; “Dr. Ayman al-Zawahiri: Hot Issues”⁶⁵; and, “Dr. Ayman al-Zawahiri:

⁵⁶ \QPH1_1\D\Documents and Settings\Elvis\Local Settings\Temp\Temporary Directory 1 for dr. ayman letter to America.zip; \QPH1_1\D\Documents and Settings\Elvis\Local Settings\Temp\Temporary Directory 2 for dr. ayman letter to America.zip; \QPH1_1\D\Program Files\Limewire\dr ayman.zip; \QPH1_1\D\Program Files\Limewire\dr. ayman letter to america.zip.

⁵⁷ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\Zawahiri_4-28-06.ram.

⁵⁸ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\As-sahab-512k.ram.

⁵⁹ \Dell Inspiron SN DJ \D\Documents and Settings\mohamed shnewer\Desktop\New Folder\AsSahab_Afghan_Rockets_USBase_Aug_2006.wmv.

⁶⁰ \Dell Inspiron SN DJ \D\Documents and Settings\mohamed shnewer\Desktop\New Folder\Dr_AI-Zawahiri_HotIssues_Sept12_2006.wmv.

⁶¹ \QPH1_1\D\Documents and Settings\Elvis\Recent\dr ayman.lnk; \QPH1_1\D\Documents and Settings\Elvis\Recent\dr. ayman letter to America.lnk.

⁶² \QPH1_1\D\Documents and Settings\Elvis\Recent\ayman 1.lnk; \QPH1_1\D\Documents and Settings\Elvis\Recent\dr ayman speech.lnk.

⁶³ \QPH1_1\D\Documents and Settings\Elvis\Recent\zawahiri2.lnk; \QPH1_1\D\Documents and Settings\Elvis\Application Data\Real\RealPlayer\History\Sahab Interview with Zawahri after 4 years.mpg.lnk.

⁶⁴ \QPH1_1\D\Documents and Settings\Elvis\Application Data\Real\RealPlayer\History\AsSahab_Afghan_Rockets_USBase_Aug_2006.lnk.

⁶⁵ \QPH1_1\D\Documents and Settings\Elvis\Application Data\Real\RealPlayer\History\Dr_AI-Zawahiri_HotIssues_Sept12_2006.lnk.

Obstacles to Jihad.”⁶⁶ Conversely, the “Shnewer’s laptop” drive indicates that, among others, the following videos were recently accessed by user account “mohamed shnewer”: “The Holocaust of the Americans in the Land of Khurasaan: Raid on an Apostate Base in Khost Province”⁶⁷; “The Holocaust of the Americans in the Land of Khurasaan: Video of the Firing of 3 Rockets at the American Base in Matchadad”⁶⁸; and, “Dr. Ayman al-Zawahiri: Hot Issues.”⁶⁹

IV. SHAYKH YOUSEF AL-AYYIRI AND AL-QAIDA IN SAUDI ARABIA

In May 2003, Al-Qaida terror cells launched a dramatic series of suicide bombing attacks on various targets inside the Saudi Arabian capital of Riyadh. The bombings heralded the emergence of a new, functioning Al-Qaida operational branch within the Saudi Kingdom. Al-Qaida’s network in Saudi Arabia was highly innovative, and it was among the first of Bin Laden’s regional “branches” or “affiliates” to adopt the Internet as a primary means to distribute communications and propaganda messages. Many electronic documents, magazines, audio, and video recordings produced by Al-Qaida in Saudi Arabia and distributed over the Internet have become classic works in the annals of the mujahideen and Al-Qaida.

The author or inspiration for much of this material was the original founder of Al-Qaida’s operational network in Saudi Arabia, and the mastermind behind the May 2003 suicide bombings in Riyadh: Shaykh Yousef al-Ayyiri (a.k.a. “The Swift Sword”). Al-Ayyiri was a Saudi national who left his home at age 18 to join the jihad in Afghanistan, eventually rising to become the commander of a mujahideen training camp.⁷⁰ Before long, senior figures in Al-Qaida began to respect al-Ayyiri as a “seasoned military man... a genius and theorizer who served jihad... He is an inspired genius and a miracle of the age. Had he been in another nation, they would not have made him walk on the ground. They would have carried him on their heads.”⁷¹ According to another digital magazine later distributed by Al-Qaida in Saudi Arabia, when al-Ayyiri learned of the September 11, 2001 suicide hijackings in New York and Washington D.C., he “was so joyous he nearly floated on air.”⁷² Addressing those who had criticized Al-Qaida for killing innocent Arab civilians during the 2003 attacks in Riyadh, al-Ayyiri scoffed, “Whoever asks why in [Saudi Arabia] should ask himself—if he was honest—why in Chechnya, why in Kabul, why in Jerusalem, why in Bali, and why in Mombassa. These countries are ruled by agent Karzai-type rulers and occupied by Americans or Jews who are

⁶⁶ \QPH1_1\D\Documents and Settings\Elvis\Application Data\Real\RealPlayer\History\Zawahri Obstacles to Jihad Dec 11, 2005.lnk.

⁶⁷ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Application Data\Real\RealPlayer\History\As-sahab-512k.lnk.

⁶⁸ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Application Data\Real\RealPlayer\History\AsSahab_Afghan_Rockets_USBase_Aug_2006.lnk.

⁶⁹ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Application Data\Real\RealPlayer\History\Dr_Al-Zawahiri_HotIssues_Sept12_2006.lnk.

⁷⁰ As-Sahab Media Foundation. “Martyrs of the Confrontations.” <http://www.page4free.biz/freepage/vnew>. December 2003.

⁷¹ As-Sahab Media Foundation. “Martyrs of the Confrontations.” <http://www.page4free.biz/freepage/vnew>. December 2003.

⁷² Al-Qaida’s Committee in the Arabian Peninsula. Sawt al-Jihad (“Voice of Jihad”) Magazine #2. <http://www.cybcity.com/suondmag2/magallh-a.zip>. October 2003.

considered infidels and untrustworthy in Allah’s book.” Moreover, according to al-Ayyiri, “this war is based on a strategy to widen the battlefield. The entire world has become a battlefield in practice and not in theory.”⁷³

Al-Ayyiri’s strategy for developing a global “homegrown” terrorist movement has had an astonishing impact, and his influence is readily apparent. In August 2008, 22-year old British national Aabid Hussain Khan was convicted by a jury in the United Kingdom of conspiring to recruit a mixed group of Americans, Canadians, and Britons to attend paramilitary training camps in Canada and Pakistan—with the ultimate goal of carrying out terrorist attacks in North America. At the time of his arrest, Khan was found in the possession of a vast library of materials relating to Yousef al-Ayyiri, including logs of online chat sessions with other co-conspirators, wherein Khan directly echoes the words of al-Ayyiri: “attacks are permissible through out this world. so the world a battlefield in my vision, everything , almost, is a target... so if you can find a big target and take it out, say like a military base in uk, then alhamdulillah.”⁷⁴

Among both Arabic and English-speaking Al-Qaida supporters, one of Yousef al-Ayyiri’s books has been particularly popular and enduring: “Constants on the Path of Jihad.” The book attracted so much attention that Shaykh Anwar al-Awlaki—an alleged associate of two 9/11 hijackers in San Diego—dedicated an entire lecture series to explaining al-Ayyiri’s underlying message in “Constants on the Path of Jihad” to an English-speaking audience:

“Jihad does not end with the disappearance of a person. Jihad must continue regardless because it does not depend on any particular leader or individual... Jihad does not depend on any particular land. It is global. When the Muslim is in his land, he performs jihad... No borders or barriers stop it. The message cannot be conveyed without jihad. If a particular people or nation is classified as... ‘the people of war’ in the Shariah, that classification applies to them all over the earth. Islam cannot be customized to suit the conditions where you are, for instance Europe.”⁷⁵

According to Awlaki, al-Ayyiri also instructed that “victory” cannot be limited to mere “military victories” alone, and should also include “sacrifice. The Mujahid sacrificing ‘his self’ and his wealth is victory. Victory of your idea, your religion. If you die for your religion, your death will spread the da`wa... Allah chooses Shuhada (martyrs) from amongst the believers. This is a victory.”⁷⁶

I have been provided with the preserved digital contents of a computer marked as “Dell Desktop from Duka” by the U.S. Attorney’s Office for the District of New Jersey which contain records of a user (or users) downloading and listening to Shaykh Anwar al-Awlaki’s English-language audio sermon teaching the lessons of Yousef al-Ayyiri’s “Constants on the Path of Jihad.”⁷⁷ Stored under a “My Documents\My Received Files”

⁷³ Al-Neda Center for Islamic Studies and Research. “The Operation of 11 Rabi al-Awwal: The East Riyadh Operation and Our War With the United States and its Agents.” August 2003. Translated into English by the United States Foreign Broadcast Information Service (FBIS).

⁷⁴ Operation Praline. Exhibit MB14\MB14C\Doc1.rar\Doc1\Conversations\ismiyy.rtf.

⁷⁵ <http://sabiluna.sitesled.com/Constants%20on%20The%20Path%20of%20Jihad.pdf>.

⁷⁶ <http://sabiluna.sitesled.com/Constants%20on%20The%20Path%20of%20Jihad.pdf>.

⁷⁷ \QPH1_1\D\Documents and Settings\Elvis\Application Data\Real\RealPlayer\History\The Constants of Jihad Lecture 1.lnk.

folder by a registered user named “Elvis”, the “Dell Desktop from Duka” also contains a physical copy of the same audio sermon by al-Awlaki explaining “Constants on the Path of Jihad.”⁷⁸ On March 9, 2007, Dritan Duka and Shain Duka were recorded discussing the importance of “Constants on the Path of Jihad” with other alleged conspirators and a cooperating witness. Shain Duka commented, “...as I was saying Serd... about Anwar al Awlaki... You gotta hear this lecture... you gotta hear it... The title? The title is Constance of [UI].” Dritan Duka echoed, “You gotta hear this lecture, this brother [UI] him locked up in Yemen, Anwar al Awlaki the Imam in Washington DC, they kicked him out of the US and now they locked him up in Yemen. He was talking about Jihad [holy struggle] the truth, no holes barred, straight how it is!”⁷⁹

Later, during the same conversation, the group of men listen to an actual copy of Anwar al-Awlaki’s sermon on “Constants on the Path of Jihad.” While the audio recording plays in the background, Shain Duka insists to them, “You gotta listen to this [UI]... He has a whole volume of this lecture.” Dritan Duka added, “You can’t buy it nowhere... He’s in jail, they arrest him, he’s on house arrest... For stuff like this, in Yemen.”⁸⁰ Shain Duka concurred with Dritan’s assessment: “You can’t find it... In his own country they locked him up for speaking like this... That’s a good lecture, huh brother? ... There’s no lies with this guy.”⁸¹ One of the other men listening—Gregori Ilichenko—praised al-Awlaki and his interpretation of “Constants on the Path of Jihad”, responding, “Mad good son.”⁸² Separately, in early 2007, the subject of “Constants on the Path of Jihad” came again several times during recorded conversations involving Eljvir Duka. In February 2007, Duka repeatedly instructed an unidentified male to download a copy of Anwar al-Awlaki’s English language lecture:

“I would like you to go on the JusOne news to this website and I can give you my password, it’s a it’s a lecture by Imam Anwar [ph] [UI]... It’s called the Constants of Jihad, the Constants of Jihad and this, ever since I heard this lecture brother I want everyone to hear about it. You know why, because he gives it to you raw and uncut... this is the truth I don’t give a damn what everybody says this is Islam, this is the truth right here. So he doesn’t sugar coat, he doesn’t have any boundaries to the truth in this, and it’s very why- why am I stressing this point, because we’re living in a time people were confused Muslims themselves they’re confused... About our own brothers, you understand? So this lecture is very necessary for people today, if you’re concerned... [It is] verbal, audio, you have to download it... let me know what you think of it when you hear it... One of the best lectures I ever heard ever.”⁸³

On April 12, 2007, Eljvir Duka was recorded during a telephone conversation he initiated with an unknown male. Duka asked, “Look, what time you open till? ...I wanted to know... do, do you have, ah, ‘The Constants-,’ ‘The Constants of Jihad’ by Anwar al Awlaki? ... It’s six, yeah, six CD’s I believe... Is there anyway you can order it for me?”

⁷⁸ \\QPH1_1\D\Documents and Settings\Elvis\My Documents\My Received Files\The_Constants_of_Jihad_Lecture_1.mp3.

⁷⁹ Transcript of Monitored Conversation. March 9, 2007. Filename: 3-9-2007-CW-2-1920-full.

⁸⁰ Transcript of Monitored Conversation. March 9, 2007. Filename: 3-9-2007-CW-2-1920-full.

⁸¹ Transcript of Monitored Conversation. March 9, 2007. Filename: 3-9-2007-CW-2-1920-full.

⁸² Transcript of Monitored Conversation. March 9, 2007. Filename: 3-9-2007-CW-2-1920-full.

⁸³ Transcript of Monitored Conversation. February 21-24, 2007. File #: 315N-PH-100652. Filename: 02232007-1931-CW2(Done-MAH).

...in Arabic I think it's 'Sowhabist [PH] al la dar [PH] al Jihad.' ...So, um, 'Constants of Jihad' in English... by Anwar al Awlaki."⁸⁴

Aside from books and audio recordings, the hard drive marked as "Shnewer's laptop" also contains significant video material relating to Shaykh Youssef al-Ayyiri and his pioneering Saudi Al-Qaida faction—most importantly, "Martyrs of the Confrontations"⁸⁵ (in both Arabic and English-subtitled versions) and "The Battle of Badr in Riyadh"⁸⁶ (subtitled in Turkish).

In December 2003, Al-Qaida's Committee in Saudi Arabia released a new video production on the Internet, titled "Martyrs of the Confrontations," in honor of Al-Qaida fighters killed or captured in clashes with Saudi Arabian security forces.⁸⁷ The video includes audio excerpts from speeches by Usama Bin Laden, wherein Bin Laden urges, "By Allah, the happy person is the one who is martyred today... Let each and every one of them step forward to kill these Jews and Americans, for killing them is one of the most urgent duties and one of the most pious acts... We incited the nation to expel this usurper and occupier enemy from the land of the two holy mosques. Some of the youths responded favorably to this... They enabled the nation to hold its head high and removed a large part of the disgrace that has enveloped us... We regard these youths as great heroes and mujahideen who walked in the footsteps of our messenger, may Allah's peace and blessings be upon him. We initiated the instigation, and they responded favorably to this."

The video continues on and an unidentified commentator explains, "They were followed by convoys of martyrs and caravans of fedayeen who did not desist from waging jihad against the Crusaders and those who protect them inside and outside our Peninsula. Even in the heartland of the Crusaders, they carried out operations that were really successful by all standards... men who are willing to sacrifice their lives to uphold the cause of God... Yes, they went out seeking death in Afghanistan, Chechnya, and elsewhere in the lands of the Muslims. Nonetheless, they were destined to achieve martyrdom on the lands of the peninsula of Mohammed... May Allah bless them." As scenes of the 9/11 hijackers and attacks in New York are shown, the commentator adds, "The United States was struck in its own backyard. The youth of Islam attacked it on that memorable day... a great change overcame the youth of Islam... praise be to Allah and to those young men who died so that their blood would revive their nation once again and make it live as Allah wanted it."

Notably, "The Martyrs of the Confrontations" includes footage of the legendary commander Shaykh Youssef al-Ayyiri conducting terrorist instructional courses at covert Al-Qaida training camps inside Saudi Arabia. Al-Ayyiri is shown lecturing to a class of young students:

⁸⁴ Transcript of Monitored Conversation. April 12, 2007. File #: 315N-PH-100654. Filename: 04.12.07-FISA(FL)(Done-MAH).

⁸⁵ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\Shuhada-almuwajahat3.ram; \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\Final.mpg.

⁸⁶ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\bedir2wmv.wmv; \Dell Inspiron SN DJ\D\Program Files\DivX\Movies\Bedir2wmv.divx.

⁸⁷ Al-Qaida's Committee in the Arabian Peninsula. "The Martyrs of the Confrontations." <http://members.lycos.co.uk/allewa/Audio/m1.ram, m2.ram, and m3.ram>. December 4, 2003.

“In the first stage, the stage of attrition and engaging the enemy in battle, you need to make your enemy tired more than you need to kill a large number of its members. You need to scatter the enemy, demoralize it, spread it out over a large area, and cause it to get tired. If the enemy is spread out, it will need supply armies and a lot of other things. You need to make the enemy reach this stage. In this stage, you should strike, run, and disappear. Strike at the weak points.”

On February 5, 2004, Al-Qaida’s Committee in Saudi Arabia released its third full-length video release, titled “The Battle of Badr in Riyadh,” which purports to tell the story behind the November 8, 2003 Al-Qaida suicide bombing attacks on the Muhaya civilian housing compound in Riyadh, Saudi Arabia.⁸⁸ The video includes martyrdom wills by the bombers, detailed footage of the construction of suicide car bombs used in the attacks, scenes from covert Al-Qaida terrorist training camps in Saudi Arabia, and actual video of the attack itself transmitted using the cell phone of one of the bombers. During the video, suicide bomber Ali bin Hamid al-Madabi al-Harbi smugly boasted, “We sacrifice ourselves for the sake of establishing an Islamic state and to remove injustice against Muslims everywhere... Many youths are eager to carry out such martyrdom operations. In fact, these operations currently constitute an effective weapon against the enemies.” A second bomber, Nasser bin Abdallah al-Sayyari al-Khalidi, admonishes viewers, “He who does not die in the arena of jihad or does not die for the cause of Allah, then he will die in some other way. Death is the same. However, if death is for the cause of Allah, then it is the goal of every Muslim and believer.” The terror cell members are subsequently shown gathered together at an Al-Qaida guesthouse waiting to carry out their mission. As they prepare to execute their attack on the Muhaya compound, the men begin to enthusiastically sing a martyrdom song “Zifou Shaheed” while brandishing a fearsome array of weapons:

“Welcome the martyr and let the believers celebrate, Allah, Allah; Welcome the martyr that has a second home in paradise, Allah, Allah; Welcome the martyr that sacrifices with his wounds, blood and clothes, Allah, Allah; His forehead became perfumed and you should not disturb his grave, Allah, Allah; Welcome the wedding groom and let his beloved ones pray for the rest of us, Allah, Allah; The name of the martyr will be repeated over and over in paradise, Allah, Allah; Around the martyr the beautiful virgins shall be gathering, Allah, Allah.”

V. THE JIHAD MOVEMENT IN IRAQ

Tanzim al-Qaida in Iraq (a.k.a. the Al-Qaida Organization in Iraq) was officially established on October 17, 2004.⁸⁹ It was formed as a continuation of a previous extremist organization known as the “Tawheed wal-Jihad Movement”, which itself was created by Jordanian national Abu Musab al-Zarqawi in response to the U.S. invasion of Iraq in March 2003. The primary purpose of Zarqawi’s organization was to overthrow the nascent Iraqi democratic government, remove the foreign occupation of Iraq, and replace them with a radical Sunni Islamist regime run by Al-Qaida. In order to achieve

⁸⁸ Al-Qaida’s Committee in the Arabian Peninsula. “Badr al-Riyadh.” <http://www.hostinganime.com/image990/bdr.htm>. February 5, 2004.

⁸⁹ <http://www.ansarnet.ws/vb/showthread.php?t=17282>. October 17, 2004.

these goals, Tanzim al-Qaida in Iraq and its leadership have relied primarily on extreme manifestations of violence as their modus operandi—including, most notably, suicide bombings. In spite of persistent efforts to paint its movement with an indigenous Iraqi face, there seems little doubt that foreign fighters from such countries as Jordan, Syria, Saudi Arabia, Lebanon, and North Africa have played a dominant role in the activities of Al-Qaida’s network in Iraq.⁹⁰

Though Al-Qaida’s operatives in Saudi Arabia were among the first of their colleagues to successfully broadcast high-quality propaganda video recordings over the Internet, the true flowering of the digital video phenomenon occurred in the context of the war in Iraq and under the watchful eye of Abu Musab al-Zarqawi. From November 2004 until his death in June 2006, Zarqawi served as the leader of Al-Qaida’s local franchise in Iraq and became a highly visible icon for second and third-generation terrorist sympathizers and recruits. The hard drive marked as “Dell Desktop from Duka” contains a copy of a high-resolution video of Abu Musab al-Zarqawi meeting with his comrades in Iraq and firing an automatic weapon.⁹¹ This is the only known such video of Zarqawi in existence. On April 28, 2006, during a recorded conversation with a cooperating witness, Mohamed Shnewer offered his own detailed analysis of the relationship between Zarqawi and Usama Bin Laden: “Did you see Zarqawi? ...Did you hear, uh, see, uh, he published a video on Tuesday, released from Iraq? ...he is Jordanian of Palestinian origin... He’s hardheaded... He is affiliated with Bin-Laden.”⁹²

Abu Musab al-Zarqawi’s penchant for and glorification of extreme violence—particularly hostage beheadings and suicide bombings—were an inspiration for like-minded militants around the world. In May 2004, Italian police monitored a suspected Egyptian terrorist recruiter in Milan as he played a video of Zarqawi decapitating U.S. hostage Nicholas Berg for a suicide bomber-in-training. The Egyptian excitedly crowed, “This is the policy we need to follow, the policy of the sword. Come and see our brother Abu Musab [al-Zarqawi]... This is the policy. Allahu Akhbar, Allahu Akhbar. Allahu Akhbar. Go to hell, the enemy of Allah. Kill him, kill him. Yes, like that, slaughter him well, cut his head off... Everyone must end up like this.”⁹³ During a recorded conversation on October 22, 2006 with several other individuals, including a cooperating witness, Eljvir Duka illustrated in detail the importance of Zarqawi’s brutal methods, and the reason for video-recording particular acts of brutality:

“...you understand why they do it you say... When you actually see it... I’ll tell you, I’ll tell you, the first beheading that I saw, the first one which I seen was Nick Berg... The first, I had never seen it before in my life too... I was in my room, upstairs in my room with the computer, me, Tony and Shahin... Nick Berg it’s probably the worst one. Because he started screaming ah, ah, Praise the Lord. And it’s the first time I have seen it in my life. Brother when I seen him... and they picked him up and the blood dripped in his head. Brother when I watched that video, I was just like everybody shut up. Yes, I

⁹⁰ “Press briefing with Brig. Gen. Kevin Bergner, spokesman, Multi-National Force – Iraq.” http://www.mnf-iraq.com/index.php?option=com_content&task=view&id=12786&Itemid=131. July 11, 2007.

⁹¹ \QPH1_1\D\Documents and Settings\Elvis\Local Settings\Temp\Temporary Directory 1 for 0425200603[1].zip\NOKIA.RMVB.

⁹² Transcript of Monitored Conversation. April 28, 2006. Filename: 4-28-06-CW1-a.m.-Full.

⁹³ <http://www.pbs.org/wgbh/pages/frontline/shows/front/etc/rabei.html>. January 2005.

was like it's getting hot in here [laughter]. I swear to God. That was brutal kid. Now we can watch it no problem."⁹⁴

Access logs stored by RealPlayer video software on the drive marked "Dell Desktop from Duka" indicate that, indeed, someone operating under user account "Elvis" has recently accessed a video of Abu Musab al-Zarqawi executing a U.S. hostage in Iraq.⁹⁵

Yet, it was Zarqawi's tragic suicide bombing attacks—carefully documented on film—that most sparked the imagination of Al-Qaida supporters around the world. Beyond depicting the mere explosions themselves, videos released by Al-Qaida in Iraq focused heavily on planning phases and the pre-execution rituals for "martyrs-in-waiting." Both the hard drives marked as "Dell Desktop from Duka" and "Shnewer's laptop" contain literally dozens of video recordings produced by the Tawheed wal-Jihad Movement, Al-Qaida in Iraq, and its successor organization, the Mujahideen Shura Council (MSC). That vast collection includes:

- **Tanzim al-Qaida in Iraq – "Winds of Victory"**⁹⁶

The importance of suicide bombers to Abu Musab al-Zarqawi's propaganda campaign from Iraq was self-evident even as early as his first full-length propaganda film, "The Winds of Victory," released in July 2004.⁹⁷ The video principally pays homage to various suicide bombings carried out by Al-Qaida against Western and Iraqi government targets in 2003 and 2004, including the devastating truck bomb attack on the United Nations compound in Baghdad and the attempted seaborne attack on an oil terminal in the Arabian Gulf off Basra. The video contains footage of senior Al-Qaida leaders, martyrdom wills read by suicide bombers of Iraqi, Kuwait, and Saudi origin, and footage of several actual suicide attacks carried out inside Iraq. Perhaps the most memorable single clip from the entire "Winds of Victory" film was a nighttime suicide truck bomb attack carried out by Iraqi national Abul-Harith Abdelrahman al-Dosari on a U.S. checkpoint at Khaldiya Bridge in early 2004. Al-Dosari is first shown reading his will and then subsequently demonstrating the use of his bomb-triggering device.⁹⁸

"To my mother, father, wife, brothers and sisters, and all my beloved ones... I have not forgotten you and will not forget you... I have not left you because of anxiety, but to answer the call from almighty Allah for jihad... we see death as more enjoyable than a thousand steps you take on the flowers among you... All it takes is the press of a button. Following that, with the help of Allah, the banner of 'No God but Allah' will prevail, and the person will be finished with this world after fulfilling his mission."

⁹⁴ Transcript of Monitored Conversation. October 22, 2006. File #: 315N-PH-100652. Filename: 1022006-1722-CW2(Done-MAH).

⁹⁵ \QPH1_1\D\Documents and Settings\Elvis\Application Data\Real\RealPlayer\History\Americanhostage.lnk.

⁹⁶ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\1windsofvictory.wmv.

⁹⁷ http://209.51.152.42/~aqcorpo/other_images/v_01.jpg. April 2005.

⁹⁸ http://209.51.152.42/~aqcorpo/other_images/v_02.jpg. April 2005.

As al-Dosari walks towards his destiny and a truck carrying nearly four tons of explosives, he is surrounded by senior Al-Qaida members who celebrate his anticipated sacrifice and chant the lyrics to the song, “Zifou Shaheed”: “Hurry the martyr, Allah, Allah. Hurry the martyr to his second home in paradise. The wedding procession of nymphs, passionate lovers. Hurry the martyr with his wounds, with his blood, with his clothes on. Pray for him, Oh beloved ones. I say goodbye as a stranger, if we do not meet on this earth, I say goodbye to you... I see that you are leaving and not coming back.”

Later, the film documents another multi-pronged suicide bombing attack in the Iraqi city of Karbala in mid-2004. The bombers included three Saudis (Abu Saad al-Makki, Abu al-Zubair al-Najdi, and Abu Amshah al-Shomari); a Libyan (Abu Abdullah al-Liby); and a Syrian (Abu Abdelkarim al-Suri). As the men are shown reading their martyrdom wills, a narrator explains in Arabic:

“These knightly angels gathered together without any prior arrangements or prior relationships. Strangers arrived from various tribes... Abu Saad al-Makki, Abu al-Zubair al-Najdi, Abu Abdullah al-Liby, Abu Amshah al-Shomari, Abu Abdelkarim al-Suri. The heavens invited them to an immortal wedding. They could see with their hearts the beautiful nymphs, while wearing fancy silks, laying on luxurious couches, opening their arms, waiting for the time to get together and waiting for the hour of our reunion [in paradise]... This blessed convoy marched forward and mounted the saddles of death in a charge towards paradise... They refused to live a life of humiliation like some people; instead, they insisted on inscribing the glory of Islam with their blood.”

An accompanying text caption on the video explained, “the mujahideen decided to wipe out the following targets: Polish troops (Abu Abdullah al-Liby will pave the way for Abu Saad al-Makki so that he can accomplish the mission); a coalition hospital (Abu Abdelkarim al-Suri will pave the way for his brother Abu Amshah al-Shomari), and the Karbala provincial building.”

Both Windows system records and logs kept by RealPlayer video software stored on the hard drive marked as “Shnewer’s laptop” indicate that user account “mohamed shnewer” has recently accessed a copy of the Al-Qaida in Iraq video “Winds of Victory.”⁹⁹

- **Tanzim al-Qaida in Iraq – “The Lion of Mesopotamia: Shaykh al-Mujahid Abu Anas al-Shami”¹⁰⁰**

The Al-Qaida in Iraq propaganda video “The Lion of Mesopotamia: Shaykh al-Mujahid Abu Anas al-Shami” was first publicly released in November 2004. This Internet-ready film was originally created as a eulogy for the slain deputy commander of Abu Musab al-Zarqawi’s organization in Iraq, Jordanian national Abu Anas al-Shami (a.k.a. Omar Yousef Jumah). It contains original interviews with a host of senior

⁹⁹ \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Application Data\Real\RealPlayer\History\Iwindsofvictory.lnk; \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Recent\Iwindsofvictory.lnk.

¹⁰⁰ \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Application Data\Real\RealPlayer\History\Biographyabuansasshami.lnk.

Zarqawi lieutenants in Iraq, including Omar Hadid and Abu Azzam al-Iraqi—and its sole purpose is to glorify violent jihad and “martyrdom.” Another masked commander named Abu Saif al-Shami declares, “With the blood of our martyr, Allah has awakened hearts that were hardened, and Allah has lit the path for others by his martyrdom, revealing the path for those who have gone astray from our path... I swear by Allah that the sincerity of our mission is demonstrated by the death of our leaders. When commanders are in the frontlines of battles and are the first to be killed, Allah will bestow victory upon us.”¹⁰¹

Access logs stored by RealPlayer video software on the drive marked “Dell Desktop from Duka” indicate that someone operating under user account “Elvis” has recently accessed a copy of “The Lion of Mesopotamia: Shaykh al-Mujahid Abu Anas al-Shami.”¹⁰² Likewise, access logs stored by RealPlayer video software on the drive marked “Shnewer’s laptop” indicate that someone operating under user account “mohamed shnewer” has recently accessed a copy of “The Lion of Mesopotamia: Shaykh al-Mujahid Abu Anas al-Shami.”¹⁰³

- **Tanzim al-Qaida in Iraq – “And The Religion Shall be for Allah Alone”¹⁰⁴**

This video is another full length propaganda film released by Al-Qaida in Iraq on June 29, 2005. The video deals primarily with suicide operations executed by Al-Qaida members in Iraq in early 2005, including vivid footage of a taxi packed with explosives slamming at high speed into a U.S. base in Ramadi and exploding into a massive fireball. It also contains messages of encouragement in Arabic from Abu Musab al-Zarqawi.¹⁰⁵

- **Tanzim al-Qaida in Iraq – “The Battle of Omar Hadid”¹⁰⁶**

Perhaps the single most memorable video of suicide bombers released by Abu Musab al-Zarqawi was the October 2005 film “The Expedition of Omar Hadid”—released over the Internet using a specialized web domain name purchased with stolen credit card numbers.¹⁰⁷ The video purports to document the story of a group of Al-Qaida suicide bombers in Iraq, including a young Libyan national using the pseudonym “Abu Dharr.” Smiling broadly, Abu Dharr proclaims to the camera before leaving on his mission:

“I ask you... whoever hears or sees this CD or hears this recording, to come join the jihad... I wish to say to the brothers, to all of the mujahideen, it is obligatory upon you to

¹⁰¹ <http://www.ansarnet.ws/vb/showthread.php?t=21506>. December 1, 2004.

¹⁰² \QPH1_1\D\Documents and Settings\Elvis\Application Data\Real\RealPlayer\History\Abu Anas.lnk.

¹⁰³ \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Application Data\Real\RealPlayer\History\Biographyabuansasshami.lnk.

¹⁰⁴ \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\Wayakoonaldeenkoloholillah120mb.wmv; \DELL INSPIRON SN DJ\D\Program Files\DivX\Movies\Wayakoonaldeenkoloholillah120mb.divx.

¹⁰⁵ <http://www.alafiam.net/Wdki/index.htm>. June 29, 2005.

¹⁰⁶ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\Gazwah-omar-hadeed-dialup.wmv; \QPH1_1\D\Program Files\Limewire\omar hadid brigades.zip.

¹⁰⁷ Al-Qaida’s Committee in Mesopotamia. “The Battle of Omar Hadeed.” <http://www.omar-hadeed.net>. MPEG Video. October 7, 2005.

continue with these martyrdom operations, because they are—by Allah—the things that affect and massacre the Americans the most, and we ask Allah for guidance in this martyrdom operation... [God-willing] we will cause great damage and pain to these infidel Americans and to those who ally themselves with them... And I wish to say to my Muslim brothers in all parts of the world, as well as to my brothers from the mujahideen: it is upon you to take this path... I want to say to America and the helpers of America and the allies of America that we are marching towards you with men who love to die just as much as you love to live!”¹⁰⁸

In addition to the testimony and encouragement from other suicide recruits, the “Battle of Omar Hadid” also features excerpts of a song being performed by members of Abu Musab al-Zarqawi’s suicide operation volunteer corps in Iraq. The men giddily chant in unison:

“Shaykh Abu Musab [al-Zarqawi] has raised the banner... Our commander is Bin Laden, O’ you who terrorizes America. Our power is our [faith] and our weapon is our PK [Kalashnikov]... Our leader is the Mullah [Omar], he has not abandoned his religion... If they say ‘terrorist’, then I say this is an honor for me. Our terrorism is praiseworthy, a divine call... We have come to you to slaughter you—no, no negotiations. We destroyed America with a civilian plane. The World Trade tower is simply a pile of rubble.”¹⁰⁹

Aside from the two copies of the video “The Battle of Omar Hadid contained respectively on the drives marked “Dell Desktop from Duka” and “Shnewer’s laptop”, the Windows system records on “Dell Desktop from Duka” indicate that the user account “Elvis” has recently accessed the same “Battle of Omar Hadid” video.¹¹⁰

- **Tanzim al-Qaida in Iraq – “The Battle of Badr in Baghdad”¹¹¹**

One of the more emblematic of such films to be produced by Al-Qaida in Iraq was known as “The Badr Raid in Baghdad” (a.k.a. “Ghazwat Badr al-Baghdad”). First released on the Internet on November 24, 2005, the video “Badr al-Baghdad” depicts a series of coordinated suicide car bomb attacks targeting civilian hotels in downtown Baghdad on October 24, 2005. During the video, using surveillance footage, an Al-Qaida commander lays out the planned operation in precise detail:¹¹²

“This is the gas station where brothers Abu Juheiman and Abu Dahham should stop. They should stop by the gas station in order to avoid attracting attention. Brother Abu Naim should move forward with the Hyundai car. He should keep moving forward... He should take the right lane towards Firdaus Square. He should keep in the right lane, in

¹⁰⁸ Al-Qaida’s Committee in Mesopotamia. “The Battle of Omar Hadeed.” <http://www.omar-hadeed.net>. MPEG Video. October 7, 2005.

¹⁰⁹ Al-Qaida’s Committee in Mesopotamia. “The Battle of Omar Hadeed.” <http://www.omar-hadeed.net>. MPEG Video. October 7, 2005.

¹¹⁰ \QPH1_1\D\Documents and Settings\Elvis\Recent\omar hadid brigades.lnk.

¹¹¹ \QPH1_1\D\Documents and Settings\Elvis\Local Settings\Temp\Temporary Directory 1 for badr baghdad.zip; \QPH1_1\D\Program Files\Limewire\badr baghdad.zip; \DELL INSPIRON SN DJ\D\Documents and Settings\moamed shnewer\Local Settings\Temp\Temporary Directory 1 for 1.zip\BadrBaghdad.wmv.

¹¹² <http://www.al-hesbah.org/v/showthread.php?t=40542>. November 24, 2005.

order to have a good angle. He keeps moving... good. This is the Palestine Meridian Hotel, which will be targeted by brother Abu Juheiman, driving a Cherokee jeep. That's the corner. Here he should pay attention to where he should meet Abu Naim. Pay attention to Abu Naim, who will be waiting here. This bomb will be directed to the right, to blow up the first concrete barrier, and the second, dirt barrier. Here you can see the Ishtar Sheraton Hotel, which will be targeted by our brother Abu Dahham, with the cement-mixer, loaded with the larger amount of explosives. It will turn left, and, Allah willing, when he enters this way, his distance from the target will not exceed 20 meters. I pray to Allah for our success."¹¹³

On April 28, 2006, during a conversation with a cooperating witness, Mohamed Shnewer discusses the video "Badr al-Baghdad" ("The New Moon of Baghdad"): "This is Baghdad. The new moon of Baghdad. The sound of bombs detonating -- And this is in Baghdad."¹¹⁴ Both the hard drives marked as "Dell Desktop from Duka" and "Shnewer's laptop" contain multiple copies of the video "The Battle of Badr in Baghdad."¹¹⁵ The Windows system records stored on the "Dell Desktop from Duka" drive indicate that the "Badr al-Baghdad" video had recently been accessed by user account "Elvis."¹¹⁶

- **Tanzim al-Qaida in Iraq – "The Battle of the Immigrants and Partisans"**¹¹⁷

In October 2005, I was given a copy of an unreleased video produced by Abu Musab al-Zarqawi's Tanzim al-Qaida in Iraq. The video had been obtained by a Swiss journalist from Die Weltwoche during interviews with Al-Qaida supporters in the country of Jordan, and appeared to depict a multi-pronged suicide bombing attack on a U.S. base in Ramadi on April 25, 2005. Though the video was never officially released by Al-Qaida's network in Iraq, copies of the video were unofficially leaked on a series of Al-Qaida websites in March 2006.¹¹⁸ As the video was not distributed by Al-Qaida's media wing, the possession of the high-resolution version of this video is quite unusual and is indicative of a particularly passionate interest in collecting Al-Qaida propaganda materials. During the video, a taxi is shown traveling at high speed down a road in Ramadi, before suddenly swerving violently to the right and careening into an American military outpost and exploding into a massive ball of flame. Immediately thereafter, a booby-trapped tanker truck is shown following the same path as the taxi, just prior to similarly detonating in front of the American outpost with devastating impact. Like the video "The Battle of Omar Hadid", "The Battle of the Immigrants and Partisans" is considered to be among the singularly most significant suicide bombing videos released by Al-Qaida during the course of the insurgency in Iraq.

¹¹³ <http://memri.org/bin/articles.cgi?Page=archives&Area=sd&ID=SP103405>.

¹¹⁴ Transcript of Monitored Conversation. April 28, 2006. Filename: 4-28-06-CW1-a.m.-Full.

¹¹⁵ \QPH1_1\D\Documents and Settings\Elvis\Local Settings\Temp\Temporary Directory 1 for badr baghdad.zip; \QPH1_1\D\Program Files\Limewire\badr baghdad.zip; \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Local Settings\Temp\Temporary Directory 1 for 1.zip\BadrBaghdad.wmv.

¹¹⁶ \QPH1_1\D\Documents and Settings\Elvis\Recent\badr baghdad.lnk.

¹¹⁷ \Dell Inspiron SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\Gazwat-Ol-Mohajreen-Wal-Ansar.avi.

¹¹⁸ <http://www.al-boraq.com/showthread.php?t=3506>. March 18, 2006.

On November 3, 2006, during a recorded conversation with a cooperating witness, Mohamed Shnewer offered his own assessment of the importance of the video, “The Battle of the Immigrants and Partisans”:

“[It was] the best operation that took place in Iraq. It was filmed... First hurling by the snipers at the ones standing at the machine-guns. Then, hurling with light machine-guns and later with the heavy machine-guns. At the same time, they would fire their mortars and their small missiles at the building where they are; a camp... One building, huge, where the Americans were located. Approximately five minutes later, they sent them a booby-trapped car... So what happened? After the first car, they started with the machine-guns and light canons. Five minutes more, they sent another car. Then machine-guns, and the last car they sent was a gas-truck... I want only to show you the operation. The one I told you about, about a building? ...How they attack it. Because it is different. When you watch the explosions... Some stuff sometimes come to me from Palestine... This one... was sent to me by a Palestinian guy from Iraq... This is the camp... yes, belongs to the Americans. Do you see how are they camping? ...This is Abu Mus’ab Al-Zarqawi, may God have mercy on his soul... See how they hit that? ...A tank... They are going to fire rockets and [UI]. They’ll send three cars, now... Look! The first car. [Sound of an explosion]... Two more cars to come... This is the gas-truck. This is the gas-truck... Here it is, available. I wanna to keep it up for you... Do you see this? This-this is ready. Just put it play to get. To watch this movie... Isn’t that the most powerful operation you’ve seen in your life?”¹¹⁹

Both Windows system records and logs kept by RealPlayer video software stored on the hard drive marked as “Shnewer’s laptop” indicate that user account “mohamed shnewer” has recently accessed a copy of the Al-Qaida in Iraq video “The Battle of the Immigrants and Partisans.”¹²⁰

Aside from these examples, the drive marked as “Shnewer’s laptop” contains copies of at least six other video recordings produced by Al-Qaida in Iraq, depicting executions, improvised explosive device attacks, paramilitary training camps, and suicide car bombings.¹²¹ Not to be outdone, the logs stored by RealPlayer video software on the drive marked as “Dell Desktop from Duka” indicate that user account “Elvis” has recently accessed at least 37 or more different video clips produced by the Tawheed wal-

¹¹⁹ Transcript of Monitored Conversation. November 3, 2006. File #:315N-PH-100654. CD#: 11032006-1242-CW1.wpd. Filename: 11-3-06-CW1-Full.

¹²⁰ \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Application Data\Real\RealPlayer\History\Gazwat-OI-Mohajreen-Wal-Ansar.lnk; \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Recent\Gazwat-OI-Mohajreen-Wal-Ansar.lnk.

¹²¹ \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Local Settings\Temp\Temporary Directory 6 for 120120056.zip\AQ Destroys American Carrier.rmvb; \DELL INSPIRON SN DJ\D\Program Files\DivX\Movies\Al-Qaida_5police_Iraq_long.divx; \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\Al-Qaida_5police_Iraq_long.wmv
 \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\MSC_Execution_Iraqi_Guards_Diyala_September62006.wmv; \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\MSC_Hummmmer_In_Dialya_Sept2006.wmv; \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\MSC_Ramadi_Tank_Mortar_attacks_August2006.wmv.

Jihad Movement, Al-Qaida in Iraq, the Mujahideen Shura Council (MSC), or Al-Qaida's latest incarnation in Iraq, the Islamic State of Iraq (ISI).¹²²

- **The Islamic Army in Iraq (IAI) – “Juba Sniper” (a.k.a. “Baghdad Sniper”)**¹²³

Aside from video recordings produced directly by Al-Qaida, other similar propaganda produced by Al-Qaida-allied jihadi movements and Iraqi insurgent groups have likewise had a profound impact on global supporters of the mujahideen and would-be homegrown terror cells. Despite its recent public falling-out with Al-Qaida, one of the most prominent of those groups has been the Islamic Army in Iraq (IAI). Founded by ex-Iraqi military, paramilitary, and intelligence personnel in 2003, the IAI has since grown into one of the largest and most influential Sunni insurgent groups active in Iraq. From its very inception, the IAI established a reputation for itself as being a sophisticated, indigenous, and more-mainstream alternative to Al-Qaida and the Ansar al-Sunnah Army. However, the IAI has nonetheless routinely used terrorist tactics as part and parcel of its military operations. In an April 2007 statement, the IAI explained:

“All of our friends and enemies know [us] well and can bear witness to the great deeds achieved by the Islamic Army in Iraq, including hundreds of attacks on military bases, some of which were completely destroyed, by the will of Allah. For example: the two big bases, the first of which was the ‘Golden Base’ in Jurf al-Sakher which took place in 2003, even before Al-Qaida’s network was established in Iraq... [We have also carried out] many other operations, a thousand each month on average, and we ask Allah for acceptance and guidance.”¹²⁴

¹²² \QPH1_1\D\Documents and Settings\Elvis\Application Data\Real\RealPlayer\History\; Abu%20Mua'wiah%20Al-Shamali.lnk; Aftermath_MSC_APC_Bradley_9232006.lnk; Alfurqan09.lnk; AlFurqan_Tank_Mosul_March192007.lnk; AQ%20Badr%20Brigades%20December%202012.lnk; AQ%20Battles%20Iraqi%20Guards%20Decem...lnk; AQ%20December%2028,%202005%20Hit%20On....lnk; AQ%20Eliminates%20Badr%20Battalion's...lnk; AQ%20Hit%20Humvee%20December%2019,%20...lnk; AQ%20Hit%20On%20US%20Vehicle%20Decemb...lnk; AQ%20Mosul%20December14,%202005.lnk; AQ%20Rocket%20Attack%20Jan%202004,%202000....lnk; AQ%20Vehicle%20Destroyed%20In%20Ramad...lnk; AQ_Announcement_On_Zarqawi_Death.lnk; aqattacksiraqiguards662005.lnk; AQBlowingUpUSHumveeOct1125.lnk; AQBradOct425.lnk; AQCarBombFallujahSept%202125; AQHumveeIraqYouseffiahJuly52005%20.lnk; AQMartyrdomTalAfarOct825.lnk; aqrocketattackusbases662005.lnk; AQsniperjune2825.lnk; Destruction_Salam_Hotel_Fallujah_ISI_....lnk; ExecutionCaptivesISIMarch3.lnk; Harvest_Islamic_State_Iraq_October_2006.lnk; Martyrdom18april.lnk; Martyrdom_operation_American_convoy_A....lnk; MSC IED Attack National Guards October 8.lnk; MSC%20IED%20Attack%20National%20Guard....lnk; MSC%20Tank%20Mosul%20February%202006.lnk; MSC_3attacks_Iraq_082026.lnk; MSC_Al-Anfal_Media_Lions_Of_Fallujah....lnk; MSC_Al-Anfal_Media_%20Lions_Of_Falluj....lnk; Mujahideen%20Council%20Downing%20Apac....lnk; Mujahideen_Islamic_State_Iraq_Mosul.lnk; Ramadi17jan.lnk; The_Mosul_Martyrdom_Operation.lnk.

¹²³ \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Application Data\Real\RealPlayer\History\Juba2.lnk.

¹²⁴ “The Islamic Army in Iraq Issues a Response to the Messages of Abu Omar al-Baghdadi.” <http://www.alhesbah.org/v/showthread?t=119646>. April 5, 2007.

In November 2003, the IAI organized and videotaped a shoulder-fired surface-to-air missile attack on a DHL Airbus A300 leaving from Baghdad International Airport. [The hard drive marked as “Dell Desktop from Duka” contains RealPlayer video software logs which indicate that user account “Elvis” has recently accessed a copy of the video of the IAI missile attack on the DHL cargo plane.]¹²⁵ In April 2005, the IAI organized and videotaped a shoulder-fired surface-to-air missile attack on a civilian Blackwater Mi-8 helicopter twelve miles north of Baghdad. The video showed IAI personnel summarily executing the lone survivor of the crash, co-pilot Lyubomir Kostov. Between 2003 and 2006, the IAI has admitted responsibility or has been otherwise implicated in the kidnapping and abduction of nearly a dozen foreign civilians in Iraq; including French journalists Christian Chesnot and Georges Malbrunot, Christian Science Monitor journalist Jill Carroll, U.S. security consultant Ronald Schultz (who was murdered during his captivity), and Italian journalist Enzo Baldoni (who was also murdered during his captivity).

The IAI’s propaganda wing has produced many video recordings—such as “Juba Sniper” (a.k.a. “Baghdad Sniper”)—that have become classic viewing not just for Iraqi insurgents, but also for supporters of global terrorism. “Juba Sniper” has been such a popular production that it has become serialized and has resulted in at least two sequels. The first “Juba Sniper” film, released in November 2005, opens with a faceless voice threatening in Iraqi-accented Arabic: “I have nine bullets in this gun and I have a gift for George Bush. I am going to kill nine people. I am doing this for the viewers to watch. Allahu Akhbar, Allahu Akhbar!”¹²⁶ The video then proceeds to show (and glorify) a variety of impressive sniper attacks targeting U.S. and Iraqi soldiers on patrol in Baghdad and other regions. According to an IAI website setup in 2007 to highlight the popularity of “Juba Sniper” among radicals, “Juba, who follows the almighty orders, and lie in wait for them in every stratagem (of war), insisted on spoiling the enemy’s happiness with his death rumors, and sent to them his message[sic].”¹²⁷ During a previous interview with an Arabic-language jihadi magazine in July 2006, the commander of the IAI explained, “Baghdad Sniper is one of the brigades of our army and not one single person, if he was injured or killed then his work would end, however, Baghdad Sniper’s is larger than one person. With the blessings of Allah Baghdad Sniper is still active and you can hear about the sniping of enemy troops here and there, and our army has a respectable share of these snipes, and what the enemy does not acknowledge is multiples of what it admits.”¹²⁸

One of those who was deeply impacted by the IAI’s release of the “Juba Sniper” series was 31-year old Muslim convert Gontzal Royo (a.k.a. Muhammad Hassan al-Andalusi) from the northeastern Spanish city of Zaragoza. Royo, a Muslim convert and the administrator of the Al-Andalus Islamiya site, was a well-known participant on English-language jihadist chat forums – including the now-defunct mujahedon.net and also a bulletin board operated by the military wing of the Palestinian Hamas movement. Royo boasted of personal friendships with Palestinian militant leaders and of his uncle’s

¹²⁵ \QPH1_1\D\Documents and Settings\Elvis\Application Data\Real\RealPlayer\History\IHA%20In%20Iraq%20C47673.lnk.

¹²⁶ <http://www.alhesbah.org/v/showthread?t=37936>. November 3, 2005.

¹²⁷ <http://www.baghdadsniper.net>. December 2007.

¹²⁸ <http://www.alboraq.info/showthread.php?t=38285>. January 3, 2008.

position as an electrician working at a nearby U.S. airbase in Zaragoza. Using his skills as a graphic artist, Royo designed propaganda posters for a variety of terrorist and insurgent organizations—including the IAI’s “Juba Sniper.” In a message posted on the official English-language forum of Hamas, Royo declared, “I a supporter of Hamas and I love the way this forum looks to follow. I am an artist from Al-Andalus (Spain), I am revert to Islam since 1995 and right now I’m involved in the creation of Islamic cartoons... Here an idealized portrait of Juba, the famous Baghdad sniper.”¹²⁹ In March 2007, Spanish police subsequently arrested Gontzal and charged him with publishing messages on the Internet supporting and justifying quote, “Islamist terrorism.”¹³⁰

The drive marked as “Shnewer’s laptop” contains copies of at least five video recordings produced by the IAI.¹³¹ Likewise, RealPlayer video software logs stored for Windows users “Elvis” and “mohamed shnewer” on the two drives marked respectively as “Dell Desktop from Duka”¹³² and “Shnewer’s laptop”¹³³ feature numerous entries indicating that the user has recently accessed an IAI video recording—including the films “Baghdad Sniper” and “Baghdad Sniper Part 2.”

VI. THE ISLAMIC ARMY OF THE CAUCASUS AND “RUSSIAN HELL IN CHECHNYA”

In December 1999, a U.K.-based mujahideen support organization known as “Azzam Publications” begin distributing copies of a video titled “Jaheem Ar-Roos” (a.k.a. “Russian Hell Part I”, “Russian Hell in Chechnya”, “Russian Hell in the Year 2000”). The video was credited to Chechen warlord Shamil Basayev and the “Islamic Army of the Caucasus”, and Azzam Publications clarified, “Although this video contains some narration and subtitles in Arabic, most of the film is self-explanatory to anyone who does not understand Arabic.”¹³⁴ It contained stunning, never-before-seen footage of grueling combat between Afghan-trained mujahideen fighters under the lead of the Saudi Ibn-ul-Khattab and Russian military forces. During arguably the most memorable scene

¹²⁹ <http://alqassam.ps/vb3/showthread.php?t=1684>. June 17, 2006.

¹³⁰ <http://www.7cgen.com/index.php?s=47ce82c3a4a82da02d43bbced8973006&showtopic=8918>. March 16, 2007.

¹³¹ \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\; IAI_Around_The_Clock_Preview_Sept2006.wmv; Alyaumwaghadan_rm.ram; JAI_Destruction_of_armored_American_truck_in_Ramadi.wmv; JAI_Mortars_US=Ramadi_72726.rmvb.wmv; Jaish_Al_Islami_Fire_Mortars_US_Base_North_Baghdad_7212006.wmv.

¹³² D\Documents and Settings\Elvis\Application Data\Real\RealPlayer\History\; Baghdad sniper Nov 25 25.lnk; Al-Jaish Al-Islami Destroys a Humvee ...lnk; IAI_Around_The_Clock_Preview_Sept2006.lnk; iaiinra.lnk; JAI_Falcon_Base_October14_2006.lnk; JAI_Humvee_Ishaqi_Iraq1392006.lnk; JAI_IED_Destroys_Flips_US_Tank_Baghdad...lnk; JAI_Ramadi_Direct_Hit_Humvee_9282006.lnk; JAI_Ramadi_Humvee_October262006.lnk; JAI_Tamayiah_December_2006.lnk; JAIkillsUSSoldierJuly3025.lnk; JaishIslamAttacksTheGreenZone.lnk; JAITheonetheyneverexpectedJuly2020025.lnk; juba2.lnk.

¹³³ \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Application Data\Real\RealPlayer\History\Alyaumwaghadan_rm.lnk; \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Application Data\Real\RealPlayer\History\Juba2.lnk.

¹³⁴ “Russian Hell in the Year 2000 Video CD-ROM.” <http://www.azzam.com/qoqaz/html/productsrussianhell.htm>. January 2000.

of the video, commander Ibn-ul-Khattab is shown personally executing a wounded Russian soldier with an AK-47 assault rifle.

The reaction was quick, and overwhelming. Azzam Publications began to publish letters from fans, including a note from one Lebanese Muslim who cheered, “I never thought I’d appreciate pictures of death as much as I do when I see those of the Russian soldiers that you post in your site.”¹³⁵ Another supporter from Australia commented, “After watching the Russian Hell video through your site, I am strongly convinced that the Mujahideen brothers are able to conduct many more similar operations to those recorded in the video. The operations were very effective, and I am very proud of it.”¹³⁶ Likewise, cooperating defendants from a jihadist network based in Northern Virginia have testified in United States federal court that watching the video “Russian Hell” encouraged them to seek training at mujahideen camps in Pakistan and Afghanistan.¹³⁷ A former member of the network, Yong Ki Kwon, testified under oath, “They (the videos) motivated us. It was like they gave us inspiration.”¹³⁸ Even Al-Qaida itself has publicly acknowledged the importance of the landmark film, “Russian Hell in Chechnya.” In December 2005, Abu Musab al-Zarqawi’s Al-Qaida faction in Iraq published the biography of a “martyred” member of their organization, noting, “The entire world watched him in the film ‘Russian Hell [in Chechnya]’. In one scene, he holds two BKC [machine guns] and fires them simultaneously. This is an image that will be burned into our memories for as long as the jihad will continue.”¹³⁹

The Windows Desktop folder for user account “mohamed shnewer” on the hard drive marked as “Shnewer’s laptop” contains numerous excerpted sections from the videos “Russian Hell in Chechnya”, “Russian Hell Part 2”, “Russian Hell Part 4”, and “Russian Hell Part 5.”¹⁴⁰ Windows system records on the “Shnewer’s laptop” drive likewise indicates that user account “mohamed shnewer” has recently accessed a copy of the video “Russian Hell Part 2.”¹⁴¹

Additionally, the “mohamed shnewer” desktop folder appears to have a copy of another video which has been of great interest to supporters of Ibn-ul-Khattab and the jihad in the Caucasus: “The Biography of Ibn-ul-Khattab.”¹⁴² During Operation Rhyme—a recent criminal case investigated by the London Metropolitan Police Service (MPS) that resulted in charges filed against seven defendants alleging conspiracies to murder and to cause explosions with intent to endanger life—a police search of defendant Omar Abdur Rehman’s residence at 55 Little Bushey Lane, Bushey, Hertfordshire recovered a wide range of material: “including a CD of the documentary film ‘The life

¹³⁵ <http://www.azzam.com/qoqaz/html/emailsjun00.htm>. July 2000.

¹³⁶ <http://www.azzam.com/qoqaz/html/emailsjul00.htm>. August 2000.

¹³⁷ Russell, Betsy Z. “Prosecutors wrap up case against student.” *Spokesman Review* (Spokane). May 25, 2004.

¹³⁸ Erdley, Debra. “Witness testifies against Al-Timimi.” *Pittsburgh Tribune-Review*. April 10, 2005.

¹³⁹ “Al-Qaida in the Land of the Two Rivers – Distinguished Martyr #6: Saif al-Ummah.” <http://www.al-hesbah.org/v/showthread.php?t=42828>. December 11, 2005.

¹⁴⁰ \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\; Jaheem-ur-roos-1-16_mb.wmv; Jaheem-ur-roos1.wmv; Jaheem-ur-roos2-18_mb.wmv; Jaheem-ur-roos2.wmv; Jaheemurroos-4.ram; JR2.mpg; Russian_Hell_vol_5_.wmv.

¹⁴¹ \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Recent\JR2.lnk.

¹⁴² \DELL INSPIRON SN DJ\D\Documents and Settings\mohamed shnewer\Desktop\New Folder\Khattab1_imam-video.wmv; Khattab2_imam-video.wmv.

and times of Khatta[b]’ a jihadist who fought in Chechnya.”¹⁴³ On April 25, 2007, defendant Omar Abdur Rehman pleaded guilty to conspiracy to cause an explosion or explosions with intent to endanger life.¹⁴⁴

On April 28, 2006, during a recorded conversation with a cooperating witness, Mohamed Shnewer discussed the importance of Ibn-ul-Khattab and how he was “poisoned” and “killed when he was leaving the house of [UI]... His hand was amputated, this Khattab guy.” Shnewer agreed with the expressed opinions of the witness and likewise praised Ibn-ul-Khattab as a military “genius.”¹⁴⁵

VII. TRAINING CAMPS AND TARGET RECONNAISSANCE BY HOMEGROWN TERRORIST NETWORKS

Aside from the library of terrorist propaganda contained on the two hard drives made available to me, I have also been provided with transcripts of recorded conversations in which various individuals discuss their enthusiastic desire to “go and fight” on a foreign jihadi battlefield or, alternatively, to launch an apparent terrorist attack on a local U.S. military or government target.¹⁴⁶

With regard to foreign battlefields, the group of men recorded in the transcripts appear to have a focused interest on Iraq and the Palestinian territories—and with using Albania and Turkey as jumping-off points to reach their final destinations. In a conversation on August 11, 2006, Mohamed Shnewer acknowledged to a cooperating witness that he had “talk[ed] about” training in “Iraq or Kashmir” with another alleged co-conspirator.¹⁴⁷ Likewise, during a conversation on March 9, 2007, Besnik Bakalli asked other individuals—including Dritan Duka, Shain Duka, and Gregori Ilichenko—“Yo man, from Albania it’s close uh? ...From us uh, to go to... Palestine.”¹⁴⁸ Dritan responded, “It’s closer to go to Iraq from [UI]... cause Turkey is attached to Iraq... Palestine is the closest... Palestine is right there by us, it’s right under, under us. Right under Italy... Little bit to the East... Us, we got it difficult, we gotta travel by camel and horse... We gotta sneak in border to border... That’s why we train, you gotta go through mountain passes.”¹⁴⁹ In return, Ilichenko suggested to the group, “Gonna meet up in Turkey... Me hop on the plane son, you niggas gotta leave a week before me.”¹⁵⁰ Clearly, this group of individuals was already involved in small-scale training activities inside the United States. Mohamed Shnewer bragged openly to others of having “bought so many bullets... we finished up all the all Wal Mart ammunition.”¹⁵¹

However, in the evidence provided to me, there seems to be a much more intense prospect of launching a military attack on a target closer to home. On August 11, 2006, Mohamed Shnewer urged his alleged co-conspirators:

¹⁴³ <http://www.met.police.uk/pressbureau/oprhyme/rehman.htm>

¹⁴⁴ <http://www.met.police.uk/pressbureau/oprhyme/defendants.htm>

¹⁴⁵ Transcript of Monitored Conversation. April 28, 2006. Filename: 4-28-06-CW1-a.m.-Full.

¹⁴⁶ Transcript of Monitored Conversation. March 9, 2007. Filename: 3-9-2007-CW-2-1920-full.

¹⁴⁷ Transcript of Monitored Conversation. August 11, 2006. Filename: 8-11-06-CW1-ALL-Full.

¹⁴⁸ Transcript of Monitored Conversation. March 9, 2007. Filename: 3-9-2007-CW-2-1920-full.

¹⁴⁹ Transcript of Monitored Conversation. March 9, 2007. Filename: 3-9-2007-CW-2-1920-full.

¹⁵⁰ Transcript of Monitored Conversation. March 9, 2007. Filename: 3-9-2007-CW-2-1920-full.

¹⁵¹ Transcript of Monitored Conversation. November 3, 2006. File #:315N-PH-100654. CD#: 11032006-1242-CW1.wpd. Filename: 11-3-06-CW1-Full.

“...we must do something, and... if we are going to do something, we must get a group that is serious, do you understand? ...Let me tell you, you might only need ten days, we need not to be fools. We need to be trained so when the zero hour comes, we must be completely meaning, you are fully ready, fully ready for a maximum efficiency operation. We simply don’t want to make a simple act and that’s it, if you know what I mean... the best thing is when we meet and find out what are we going to do first... for example, a suicide mission would require little amount of money... If we are going to do a suicide mission, what would we do? We will steal a car, a big van or something and we will put in it what we want in a stolen car, the idea is that, you can’t trace it to anybody... I was hoping these bombs, they are hand-held... you aim and then throw... The ingredients... Gun powder is easy to buy... Which compounds, the plaster.. You know who has experience in this as well? ...The one I talked to you about from Kosova [sic]... I told you he is eager to do something... He has experience... nail bombs will be great, yes I know these kind of bombs, The Palestinians used it several times, in missions in Tel Aviv and Khudayra [PH]... if you do something like a nail bomb, you can put it on the side of the street... On the side of the street and you cover it with tree leaves, on the side of the street like that and leaves and branches. If you, if you get this bomb... and put it on the side of the street... You put four of them... The first--the first car drives over the last bomb, you detonate it. Then when you press on the trigger, the hand guns will start... there is another bomb [Clearing throat] of which I have a video... where they manufacture the suicidal bomb... you can get the material from anywhere... I am sure because it’s used... for example pipe bombs are easy to make if you have a handy fellow.”¹⁵²

However, Shnewer acknowledged that the drawback of such a mission would be the “difficult[y] in surviv[ing] it... I understand and I understood this from the get go. When you asked me if there is anyone who wants to execute a suicide mission, I was going to do it.”¹⁵³ Shnewer added that he recognized any potential plan would be “a lot easier” if it involved “guns” as opposed to “bombs.”¹⁵⁴ In response, Shain Duka indicated, “We are waiting for Agron’s brother to come with M-16s... Why not, why won’t go and [UI] right by and not get caught and then after that you will do it again... why give them a chance to kill you, it’s good... I’m saying, the best thing is to kill and get away and do it another day.”¹⁵⁵

Whether by gun or by explosive, Mohamed Shnewer insisted in his words to his alleged co-conspirators, “I like it, when we do something, I mean... that it really shakes the... I mean to shake the country. Nine eleven happened... Look, till now they still are unable to revive from it.”¹⁵⁶ For his own part, Dritan Duka appeared equally eager to do his part for the cause of jihad. On March 10, 2007, he declared:

“...brother, it’s unbearable. We have nothing here... I’m going to start something... We have no access to getting arms, you can’t go there with handgun... We would need this,

¹⁵² Transcript of Monitored Conversation. August 11, 2006. Filename: 8-11-06-CW1-ALL-Full.

¹⁵³ Transcript of Monitored Conversation. August 11, 2006. Filename: 8-11-06-CW1-ALL-Full.

¹⁵⁴ Transcript of Monitored Conversation. August 11, 2006. Filename: 8-11-06-CW1-ALL-Full.

¹⁵⁵ Transcript of Monitored Conversation. March 10, 2007. File #: 315N-PH-100652. Filename: 03102007-1300-CW2(Done-MAH).

¹⁵⁶ Transcript of Monitored Conversation. November 3, 2006. File #:315N-PH-100654. CD#: 11032006-1242-CW1.wpd. Filename: 11-3-06-CW1-Full.

RPG's... That finishes the job... because we have enough people. We are seven [7] of us, we are stupid and that's what we need, we have to be stupid... You must love your religion and be stupid... See, every one of us that's involved is stupid, we are not normal... You're not normal, I'm not normal... Serdar is not normal, Russia the same, all, all of us that we are with are very crazy in a way... also there's Sayed from Afghanistan... The son of the guy that we must give the money to... He's the youngest boy... [Laughing] You have never seen crazier... And smooth... Just don't get caught, cause that's what you don't want because then you will be put in jail... Be ready to die... I will do it Inshallah... We just haven't found out how to do it... that's the problem, because I'm ready! ...For now seven [7] are a lot, you can do a lot with seven [7] people... you can do a lot of damage man, seven [7] people... you do, you do big thing with seven [7] people... I'm spreading the word out that we look for... I say in the beginning we start finding the things that we need... It's something that will take six [6] months to a year... until the plan becomes like it's supposed to... I say we put the word out and I'm saying this with all my heart... this thing has to be done."¹⁵⁷

In reply, Shain Duka echoed, "I don't like to talk and not do anything... when the time comes Inshallah I will do it!"¹⁵⁸

The group of men—particularly Mohamed Shnewer—also appear to have participated in focused paramilitary reconnaissance targeting Fort Dix and other nearby U.S. military installations. A conversation recorded on August 11, 2006, contains portions of a discussion between Shnewer and a cooperating witness as they conduct reconnaissance for a would-be attack on Fort Dix. Shnewer gives directions to the witness who is driving their vehicle:

"Eh, Straight [UI]... Yes. This is where the deliveries are... don't point at anything over here because they have cameras installed here... What is this? 'Army Reserve.' This is... this is the reserve... Visitors center. Do you see it? ...Aha. You go around. We need to get out. No, no, get inside... Main Gate. Do you see the one for the visitor? The one on the right... Just look. But these are for the people who want to come and just look around. No, can we go inside. I didn't know it was like that... Get in, get in by the visitor center. Then we will get out from there... Maybe by the delivery center... On the right... Yes, yes, I know. This is what I was looking for... We will see it by the delivery... From the location where deliveries are made... We should go around one more time... I used to come here to pass by Serdar. We cannot come here, uh, uh, because there are plenty of cameras here... It is mined."¹⁵⁹

Shnewer suggested to the witness that "what I am looking for" is "a place that you walk by a fence and see the army":¹⁶⁰

"In a few you will see... The planes... Yes, follow this road. You see this is all a military area. I am looking to see the... watchtowers... I think the checkpoint is easy... I mean for you to go inside. it is easy to infiltrate it this fence... These people... because they are...

¹⁵⁷ Transcript of Monitored Conversation. March 10, 2007. File #: 315N-PH-100652. Filename: 03102007-1300-CW2(Done-MAH).

¹⁵⁸ Transcript of Monitored Conversation. March 10, 2007. File #: 315N-PH-100652. Filename: 03102007-1300-CW2(Done-MAH).

¹⁵⁹ Transcript of Monitored Conversation. August 11, 2006. Filename: 8-11-06-CW1-ALL-Full.

¹⁶⁰ Transcript of Monitored Conversation. August 11, 2006. Filename: 8-11-06-CW1-ALL-Full.

You know what Mahmoud? All of this is because of their arrogance... All of this is because of their arrogance. You know what they say? This is our army and no one can target it. This is what they freakin mean. These people have arrogance... Yeah, yeah. We are America and no one can hit us. This is their freakin thinking and we are going to make them think differently, God willing... We are going to make them put their bases in the sea... This is the area we were looking for. You hit 4 or 5 humvees six, and light the whole place and retreat completely, I mean without any casualties... The problem now is what? We are we in need of... we are in need of, there is no way around getting... we need RPGs, or hand grenades... I was thinking of a plane hangar and I was thinking that I would have the [Clearing throat] possibility to get either mortar projectiles or [Clearing throat] RPGs. Why? Because the mortar projectiles will have a big impact specially if you could get something heavy. Do you understand me? ...Mortar, mortar, you know what a mortar is? Especially if you can get a heavier projectile... To do damage, that would really be a quality operation.”¹⁶¹

VIII. CONCLUSIONS

The evidentiary materials provided to me the U.S. Attorney’s Office for the District of New Jersey contain almost all the necessary ingredients for relative neophytes to form their own homegrown underground terrorist cells for the purposes of violent jihad. The cached material is generally of fairly recent origin and thematically tracks the most extreme wings of Al-Qaida in Iraq and Saudi Arabia that have specialized in fringe tactics such as beheadings and suicide bombings. There is a specific, disturbing emphasis on rituals associated with suicide bombers and justifying such sacrificial actions, even when they result in the deaths of innocent civilians. It is not simply a matter of one or two items easily located via general searches on the Internet, but rather an extensive and impressive reference library of terrorist-related audio and videos that would require many concentrated hours of browsing and downloading to assemble. In February 2007, Besnik Bakalli asked Mohamed Shnewer “How much does it worth if you want to sell that CD you have tape that, that thing in computer?” Shnewer quickly replied, “I wouldn’t sell it Bro, I worked hard to put everything in there.”¹⁶² The individual(s) responsible for amassing these collections were unusually diligent in their mission—significantly more so than one would expect from a mere curious websurfer with a “passing interest.”

During his conversations with other alleged co-conspirators and cooperating witnesses, Mohamed Shnewer demonstrates not only his remarkable familiarity with the videos, but more importantly, how the knowledge contained therein can be put to effective use by would-be terrorists-in-training. On one occasion in August 2006—while ruminating over the most effective explosives techniques and methods—Shnewer suggested, “the best thing--the best video to help us... is a video from Hamas. That I have which tells you how to make the suicide bomb. If you know how to manufacture any bomb, we can use a suicide bomb, for example, they use the wire in a suicide bomb from the body till here.”¹⁶³ Alternatively, he opined, “can’t we make one like them [UI] like... in Iraq... They make them by hand... I used to have, may God pray on Muhammad,

¹⁶¹ Transcript of Monitored Conversation. August 11, 2006. Filename: 8-11-06-CW1-ALL-Full.

¹⁶² Transcript of Monitored Conversation. February 5, 2007. Filename: 2-5-07-session-23-final-full.

¹⁶³ Transcript of Monitored Conversation. August 11, 2006. Filename: 8-11-06-CW1-ALL-Full.

a video [UI] I have the video that will show you how... I have a video that will show how to make the [UI] IED's the bombs that are put on the street... in Iraq... They use it... I have a video in Arabic."¹⁶⁴

As demonstrated by the above analysis, the evidentiary materials provided to me the U.S. Attorney's Office for the District of New Jersey (in the form of the hard drives marked as "Dell Desktop from Duka" and "Shnewer's Laptop") communicate the general aims and ideology of Al-Qaida and affiliated groups to a wide, global audience; they further communicate specific guidance on the use of Al-Qaida's preferred military tactics such as suicide bombings; they foster a sense of organization and purpose for isolated extremists living in Western countries who are drawn to Al-Qaida; and, finally, they encourage even those who have no direct connection to Al-Qaida to join its cause and execute military operations on its behalf around the world, including the use of suicide bombings. Especially when taken into context with the transcripts of recorded conversations provided to me by the USAO, and for the above reasons, I conclude that this material is very likely to be useful to a person or persons conspiring to join a terrorist organization or preparing an act of terrorism.

¹⁶⁴ Transcript of Monitored Conversation. August 11, 2006. Filename: 8-11-06-CW1-ALL-Full.