

# United States District Court

DISTRICT OF OREGON

UNITED STATES OF AMERICA

v.

## CRIMINAL COMPLAINT

**MAHER MOFEID HAWASH,**  
Defendant.

CASE NUMBER: 03-m-481

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 24, 2001, in Multnomah County, in the District of Oregon defendant did, (Track Statutory Language of Offense)

along with others, depart the United States in an attempt to enter the country of Afghanistan to Contribute Services, Material Support and Resources to al Qaida, the Taliban and other Foreign Terrorist Organizations, as well as, to levy war against United States armed forces and United States allied forces in the region.

in violation of Title 18 and 50 United States Code, Section(s) 2384, 2339B and 1705(b).

I further state that I am a(n) Task Force Agent of the FBI and that this complaint is based on the following facts:

Official Title

See affidavit of Task Force Agent Thomas W. McCartney, Federal Bureau of Investigation, attached hereto and incorporated herein by reference.

Certified to be a true and correct copy of original filed in my office.  
Dated 4-28-03

By Donald M. Cinnamon, Clerk  
Deputy

FILED 03 APR 28 09 43 AM '03

Continued on the attached sheet and made a part hereof:

Yes  No

Thomas W. McCartney

Signature of Complainant  
**THOMAS W. MCCARTNEY**  
Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

April 28  
October, 2003  
Date

at

Portland, Oregon

City and State

**ROBERT E. JONES**  
UNITED STATES DISTRICT JUDGE

Name & Title of Judicial Officer

Robert E. Jones  
Signature of Judicial Officer



1 violation of 50 U.S.C. § 1705(b) and 31 C.F.R. §§ 545.204, 545.206(b) and 595.205; and  
2 Possessing Firearms in Furtherance of Crimes of Violence in violation of 18 U.S.C. §  
3 924(c)(1)(A)(iii) (defendant Lewis and Muhammad Bilal are not charged in the final count).  
4 With the exception of Al Saoub the defendants have been arrested and are currently in  
5 custody pending trial which is scheduled for October 1, 2003. Since the indictment and  
6 arrests the investigation has continued to determine sources of funding for the travel of the  
7 named conspirators and to identify additional participants in the conspiracies.

8 4. Based upon evidence seized at the time of the arrests and the evidence  
9 gained through followup investigation, we have identified HAWASH as having traveled to  
10 China in October 2001, with the above conspirators (with the exception of Lewis) in an  
11 attempt to enter Afghanistan to fight against United States forces. The details of the  
12 additional evidence is described below. I have attempted to put the details in the context of  
13 the events that occurred during the fall of 2001 through the present.

14 5. The statements contained in this affidavit are based in part on information  
15 provided by FBI Special Agents and Joint Terrorism Task Force Agents of other agencies,  
16 or information provided by confidential sources, and on my experience and background as a  
17 Senior Trooper of the Oregon State Police. Since this affidavit is being submitted in  
18 support of a criminal complaint, I have not included each and every fact known to me  
19 concerning this investigation. I have set forth only the facts that I believe are necessary to  
20 establish the necessary probable cause to support the complaint.

#### 21 **BACKGROUND OF IDENTIFIED CONSPIRATORS AND ASSOCIATES**

22 6. Jeffrey Leon Battle: Battle, also known as "Ahmad Ali," also known as  
23 "Abu Isa," is a black male, date of birth December 29, 1969, State of Oregon driver's license  
24 number [REDACTED]. Battle is a United States citizen by birth. Battle has no felony  
25 convictions.

26 7. October Martinique Lewis: Lewis, also known as "Khadijah," is a black  
27 female, date of birth October 31, 1976, State of Oregon driver's license number [REDACTED].  
28 Lewis is a United States Citizen by birth. Lewis has no felony convictions.

1           8.     Patrice Lumumba Ford: Ford, also known as "Lumumba," is a black male,  
2 date of birth March 9, 1971, State of Oregon driver's license number [REDACTED] Ford is a  
3 United States citizen by birth. Ford has no felony convictions.

4           9.     Ahmed Ibrahim Bilal: Bilal is a black male, date of birth October 21, 1977,  
5 State of Oregon driver's license number [REDACTED] Ahmed Bilal is a United States citizen by  
6 birth. Ahmed Bilal has no felony convictions.

7           10.    Muhammad Ibrahim Bilal: Bilal is a black male, date of birth January 26,  
8 1980, State of Oregon driver's license number [REDACTED] Muhammad Bilal is a United  
9 States citizen by birth. Muhammad Bilal has no felony convictions.

10          11.    Habis Abdulla Al Saoub: Al Saoub, also known as "Abu Tarek," is a Middle  
11 Eastern male, born in Karak City, Jordan, date of birth November 19, 1965, State of Oregon  
12 driver's license number [REDACTED] Al Saoub has no felony convictions. Al Saoub is a  
13 Lawful Permanent Resident of the United States. Al Saoub formerly resided at 8317 SW  
14 22nd Avenue, Apartment 8, Portland, Oregon. Al Saoub is currently believed to be outside  
15 of the United States. His exact whereabouts are unknown.

16          12.    **Maher Mofeid HAWASH: HAWASH**, also known as "Mike"  
17 **HAWASH**, is a Palestinian male, born in Nablus, Jordan, date of birth December 12, 1964,  
18 State of Oregon driver's license number [REDACTED]. **HAWASH** is a naturalized United States  
19 citizen, Certificate of Naturalization number [REDACTED], signed December 14, 1990.  
20 **HAWASH** has no felony convictions. **HAWASH** resided with his wife, Lisa Michell  
21 **HAWASH** (Ryan), a Caucasian, date of birth June 19, 1968, and three children, in  
22 Hillsboro, Oregon. According to the Oregon Bureau of Vital Statistics, **HAWASH** and  
23 Ryan married on August 12, 1995, in Douglas County, Oregon. Employment checks with  
24 Intel Corporation indicate that **HAWASH** was hired at Intel on September 21, 1992, and  
25 terminated on August 1, 2001. From October, 2002, until at least March, 2003, he was an  
26 active contract employee at the Hawthorne Farms Campus of Intel Corporation. Various  
27 witnesses have indicated that **HAWASH** attends the Bilal Mosque in Beaverton, Oregon.

28     ///

## SUMMARY OF INVESTIGATION

1  
2           13. This investigation involves at least six, and perhaps more, Oregon residents  
3 (United States citizens and aliens alike) who after September 11, 2001, decided to travel to  
4 Afghanistan to fight for Al-Qaeda and the Taliban against the forces of the United States.  
5 As described more fully below, six individuals, Battle, Ford, Steitiye, Ahmed Bilal, Ilir  
6 Koni, and Al Saoub engaged in weapons training at a gravel pit in Skamania County,  
7 Washington on September 29, 2001. In October 2001, Battle, Ford, Muhammad Bilal,  
8 Ahmed Bilal, Al Saoub, **HAWASH** and others unknown, departed the United States. It is  
9 believed that Battle, Ford, Ahmed Bilal, Muhammad Bilal, Al Saoub, **HAWASH** and  
10 others unknown, left the United States in an attempt to enter the Afghanistan and combat  
11 U.S. Armed Forces in the region. Since their departure in October 2001, Battle, Ford,  
12 Muhammad Bilal, and **HAWASH** returned to Portland, Oregon. Lewis maintained contact  
13 with Battle via telephone and e-mail while Battle was out of the country. Lewis provided  
14 Battle and perhaps others with financial support via Western Union wire transfers while  
15 Battle was out of country.

## FACTS AND CIRCUMSTANCES

16  
17           14. As is well known, on September 11, 2001, the United States was attacked by  
18 terrorists who hijacked four planes and flew two of them into the buildings of the World  
19 Trade Center in New York and one into the Pentagon outside of Washington, D.C. The  
20 attack was organized by Usama bin Laden and his terrorist organization, Al-Qaida, which  
21 was headquartered at the time in Afghanistan and under the protection of the Taliban regime  
22 in that country. Al Qaida has been designated as a foreign terrorist organization since  
23 October 8, 1999. In response to the September 11 attacks, President Bush declared a  
24 national emergency. After the Taliban refused repeated demands by the United States to  
25 turn over bin Laden, the United States and allied forces began retaliatory bombing of targets  
26 in Afghanistan on or about October 7, 2001. Beginning also in or about October 2001,  
27 United States armed forces entered the conflict.

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1           15.     On September 29, 2001, at approximately 6:00 p.m., according to an incident  
2 report, a sheriff's deputy of the Skamania County Sheriff's Office, Stevenson, Washington,  
3 was notified by dispatch of a shooting complaint at milepost 26 on State Route 14 in  
4 Washougal, Washington. This is a privately owned gravel pit with a locked gate and  
5 numerous posted "No Trespassing" signs. Upon his arrival, the sheriff's deputy noticed two  
6 vehicles with Oregon license plates parked near the gate, and could hear shooting in the  
7 gravel pit area. The sheriff's deputy exited the patrol vehicle and walked past the locked  
8 gate and toward the gravel pit. As he walked up the road, the sheriff's deputy noticed a  
9 small group of individuals shooting several weapons. The sheriff's deputy told them to put  
10 down the weapons, which they did. The sheriff's deputy advised them they were on private  
11 property, and several of the individuals informed the sheriff's deputy they were from the  
12 Portland area and had come to the gravel pit to shoot their weapons. The sheriff's deputy  
13 recognized the following weapons present: a Remington 870 12 gauge shotgun, a 30:06  
14 rifle with scope, a Chinese SKS 7.62 assault rifle, a Kel-Tec 9mm semiautomatic pistol, and  
15 a Makarov 9mm semiautomatic pistol.

16           16.     The sheriff's deputy asked each of the individuals for identification. Jeffrey  
17 Leon Battle, Ali Khaled Steitiye, and Ilir Koni, all produced Oregon state drivers licenses  
18 for the sheriff's deputy. Patrice Lumumba Ford, Ahmed Ibrahim Bilal, and Habis Al Saoub  
19 verbally provided the sheriff's deputy with identifying information. The sheriff's deputy  
20 then advised the group to pick up their weapons and leave the area, which they did.

21           17.     As described later in this Affidavit, Battle later told a cooperating individual  
22 about the day they were shooting guns at a gravel pit and were contacted by a police officer.  
23 They were shooting automatic weapons that made a lot of noise. Battle stated that they  
24 were going to "pop" the cop if he wasn't cool. However, the cop turned out to be one of  
25 those guys that love guns and that "saved his butt."

26           18.     Documents obtained from First American Title Insurance Company reveal  
27 that on October 9, 2001, Maher **HAWASH** quit claimed title to **HAWASH's** residence in  
28 Hillsboro, Oregon, to his wife, Lisa **HAWASH**.

1           19. Documents obtained from Washington County, Oregon, reveal that on  
2 October 9, 2001, HAWASH also signed a General Power of Attorney in Washington  
3 County, Oregon, giving Lisa Hawash authority to act legally on his behalf.

4           20. Documents obtained from REI, 6750 S. 228th Street, Kent, Washington  
5 reveal that on October 14, 2001, Maher HAWASH purchased a "Triad" brand parka for  
6 \$174.99, a "Kelty Moraine" brand internal frame backpack for \$89.99, two pairs of  
7 "Merino" brand wool hiking socks, and a pair of sunglasses, from the REI Tualatin, Oregon,  
8 store.

9           21. Documents obtained from REI, 6750 S. 228th Street, Kent, Washington  
10 reveal that on October 18, 2001, Maher HAWASH purchased a pair of "Lost Horizons"  
11 brand gloves for \$12.00 and a pair of "Zamberlan" brand hiking boots for \$189.00 at the  
12 REI Portland, Oregon Store #13.

13           22. On October 19, 2001, a resident of the Grail Apartments in Portland, Oregon  
14 provided to the Portland Division of the FBI a plastic grocery bag containing miscellaneous  
15 paperwork, some in Arabic, that he/she discovered earlier that week in the recycling bin at  
16 the apartment complex. Among the items contained in the bag was a canceled passport  
17 from the Hashemite Kingdom of Jordan, number B963219, in the name of Habes Abdullah  
18 Falah Sau'b, born in 1965 in Karak. Additionally, there was a payment notice from Portland  
19 General Electric Company to Habis Al Saoub, 8317 SW 22nd Avenue, Apartment 8,  
20 Portland, Oregon, and various Internal Revenue Service documents in the name of Habis Al  
21 Saoub, social security account number [REDACTED] Al Saoub formerly resided at 8317  
22 SW 22nd Avenue, Apartment 8, Portland, Oregon. There were also various medical  
23 documents, as well as printouts of internet documents in Arabic.

24           23. Also discovered was a seventeen page, handwritten, Arabic document.  
25 Subsequent translation of the document revealed that the document is entitled, "A martyr's  
26 will." The document is directed to the Mujahadeen leader, Mohammad Ibin Abdallah.  
27 The martyr's name is not mentioned in the document, and there is no date associated with it.

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1 The author quite frequently refers to historical events and statements made by religious  
2 groups and personalities to support his recommendations.

3 24. The author declared that the animosity and the threats of the many nations  
4 against his nation has brought it disgrace and humiliation. The author heavily emphasized  
5 the importance of jihad, and quoted statements made by the prophet over 1400 years ago in  
6 which the prophet said that if people elect to settle for what is easy and leave the jihad, they  
7 will be disgraced and humiliated. In the author's opinion, the prophet made it clear that  
8 leaving the jihad is leaving the Islamic religion. The purpose of the jihad is to fight the  
9 tyrants of the earth and free the people so they can choose whom to worship.

10 25. The author indicated that he was writing this "will" in Afghanistan, the land  
11 of the brave people who refuse to live in disgrace, and thanked the Afghans for keeping the  
12 jihad going. The author complimented the Afghans for fighting in spite of their poverty and  
13 lack of material things. For more than eleven years they have faced the enemy bullets with  
14 bare chests, climbing the snowy and thorny country side with bare feet. In his opinion the  
15 Afghans were unknown before the jihad, but today they are on the map and everyone in the  
16 world has heard of their manly stand against the enemy. He asked the Muslims of the world  
17 to follow the Afghani example.

18 26. Bank records indicate that on October 23, 2001, Lisa M. Hawash made a  
19 withdrawal in the amount of \$5000 from her joint US Bank account with Maher  
20 **HAWASH**, account number [REDACTED] Records also indicate that on October 23, 2001,  
21 US Bank account number [REDACTED] was opened in the name of Lisa M. Hawash with  
22 a deposit amount of \$5000. No withdrawals were made from this account until  
23 November 23, 2001, after **HAWASH** returned from China.

24 27. On October 29, 2001, a source (hereinafter referred to as S#1), advised that  
25 he/she had gone shooting with an individual at a rock pit near Vernonia, Oregon. The  
26 individual had informed S#1 that a group of individuals had shot at a gravel pit in the state  
27 of Washington following the terrorist attacks of September 11, 2001. S#1 was told by the  
28 individual that many of these individuals were going to fight in the jihad (a holy war against

1 the infidels, as a religious duty) in Afghanistan. The individual also informed S#1 that he  
2 had shot weapons at this location in Washington with Ali Khaled Steitiye. S#1 is  
3 cooperating with the FBI because of possible exposure for a false statement on an ATF  
4 firearms purchase form and because he/she is receiving financial benefits from the FBI.

5 28. On December 27, 2001, a source (hereinafter referred to as S#2) who is a  
6 person who was in regular contact with a close associate of Ahmed Bilal, advised that  
7 Ahmed Bilal, Muhammad Bilal, and Patrice Lumumba Ford departed the United States in  
8 order to join the Taliban/Al-Qaida forces fighting in Afghanistan. The source stated that all  
9 three, U.S. citizens by birth, departed shortly after the U.S. began bombing Afghanistan, in  
10 approximately mid- to late-October 2001. S#2 stated that Ahmed Bilal, Muhammad Bilal,  
11 and Ford traveled through China in their attempt to reach Afghanistan. They were unable to  
12 enter Afghanistan, however. S#2 voluntarily contacted the FBI sometime after  
13 September 11, 2001, to provide information about potential terrorism. S#2 has been  
14 financially rewarded for some of the information provided.

15 29. According to records of Alaska Airlines, Ford, Ahmed Bilal, and  
16 Muhammad Bilal traveled by Alaska Airlines commuter airline, Horizon Air flight 2254  
17 from Portland, Oregon to Seattle, Washington on October 20, 2001. The same individuals  
18 then traveled by Asiana Airlines from Seattle to South Korea, and then on to Hong Kong.

19 30. S#2 stated that Ford is fluent in Chinese and received a degree in Chinese  
20 Studies from Portland State University. Ford's familiarity with Chinese culture and language  
21 was the reason that he elected to have Ahmed Bilal, Muhammad Bilal, and himself travel  
22 through China in their attempt to reach Afghanistan.

23 31. Records of Korean Air indicate a passenger ticket was issued in the name of  
24 Mr. Jeffrey Battle on October 10, 2001 in Portland, Oregon for travel from Portland,  
25 Oregon on United Airlines flight number 2253 on October 17, 2001 to San Francisco,  
26 California. Travel was then scheduled to continue from San Francisco to Seoul on Korean  
27 Air flight number 24, and then to Hong Kong on Korean Air flight number 607. The ticket

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1 provided for travel from Seoul to Portland, Oregon on November 20, 2001. The ticket was  
2 purchased for \$647.70 in cash.

3 32. Records also indicate a passenger ticket was issued in the name of Mr.  
4 Alsoub Hibes (Al Saoub) on October 12, 2001 in Portland, Oregon, and provided for the  
5 same path of travel to Hong Kong as the ticket for Battle. Al Saoub departed Portland on  
6 the same flight as Battle on October 17, 2001. The ticket for Alsoub was classified as open  
7 for the return flight to Portland, Oregon. Also located was an agent coupon for a passenger  
8 ticket number in the name of Mr. Saoub Habes (Al Saoub). The ticket was issued on  
9 October 15, 2001 in Portland, Oregon. The ticket is a reissue of the ticket in the name of  
10 Mr. Alsoub Hibes. The travel remained the same, but the name of the passenger was  
11 changed. The ticket was purchased for \$673.21 with cash.

12 33. Northwest Airlines flight manifests confirm that on October 24, 2001,  
13 **HAWASH** departed Seattle, Washington, through Tokyo, Japan to Hong Kong, China on  
14 NW flights #7 and #17, respectively. These manifests further confirm that on  
15 November 18, 2001, **HAWASH** returned from Hong Kong, China, via Tokyo, Japan, to  
16 Seattle, Washington on NW flights #18 and #8. These same records indicate that  
17 **HAWASH** originally purchased the round trip ticket, with a return date of March 1, 2002,  
18 by using frequent flyer miles.

19 34. An employee of Asia Tour & Travel, Portland, Oregon, was interviewed by  
20 law enforcement and advised that she received a telephone call from an individual named  
21 Patrice Ford approximately two or three days prior to October 16, 2001. During the  
22 telephone conversation, Ford made a reservation for travel utilizing both Alaska Airlines  
23 and Asiana Airlines from Portland, Oregon to Hong Kong on October 20, 2001.

24 35. The same employee received another telephone call from Ford a day or two  
25 later during which Ford made reservations for Ahmed Bilal and Muhammad Bilal utilizing  
26 the same pattern of travel.

27 36. Asia Tour and Travel records indicate that on October 16, 2001, Ford,  
28 Ahmed Bilal, and Muhammad Bilal paid \$670.46 cash for each of their tickets.

1           37.     **HAWASH** provided Northwest Airlines with the Man Hing Lung Hotel,  
2 room D6, telephone number 231188077, for his local contact information in Hong Kong.  
3 Open source information obtained via the internet indicates that the Man Hing Lung Hotel  
4 is located at Flat F2, 14/F, Mirador Mansion, 58 Nathan Road, Tsim Sha Tsui, Kowloon,  
5 Hong Kong, telephone numbers 23118807 and 27220678. Security Wing, Hong Kong  
6 Police, confirmed that **HAWASH** did not stay at this location.

7           38. Security Wing, Hong Kong Police, confirmed that Jeffrey Leon Battle, and  
8 Habbis Abdulla Al Saoub stayed at the Luen On Guesthouse, Flat E3, 13/F, Mirador  
9 Mansion, 54-64 Nathan Road, Tsim Sha Tsui, Kowloon, Hong Kong, during the period  
10 October 18, 2001 through October 27, 2001.

11           39.     The Man Hing Lung Hotel and the Luen On Guesthouse are located within  
12 the same building.

13           40.     Information was obtained by FBI Special Agent Tony Lau, Office of the  
14 Legal Attache, United States Embassy, Beijing, China, that **HAWASH** entered China via  
15 Guangzhou City on October 27, 2001, and that he departed China via Guangzhou City on  
16 November 17, 2001.

17           41.     Copies of hotel registration records obtained by SA Lau reveal that at the  
18 Shan Cheng Hotel in Urumqi there resided six persons: "**HAWASH** Maher Mofeid,"  
19 "Battle Jeffrey Leon," "Ford Patrice Lumumba," "Muhammad Ibrahim Bilal," "Ahmad  
20 Ibrahim Bilal," and an individual identified in the record as "Habesabdulah Falahsaoub."  
21 These documents further show Al Saoub's date of arrival (DOA) at the Shan Cheng Hotel  
22 on 10/28/2001; **HAWASH**'s DOA on 10/28/2001; Ford's DOA on 10/28/2001 and  
23 11/07/2001; Muhammad Bilal's DOA on 10/28/2001 and 11/07/2001, Ahmed Bilal's DOA  
24 on 10/28/2001 and 11/07/2001, and Battle's DOA on 10/28/2001 and 11/07/2001.

25           42.     Hotel records obtained further reveal that **HAWASH**, Battle, Ford,  
26 Muhammad Bilal, Ahmad Bilal, all resided at the Chini Bagh Guest House, Kashgar, China.  
27 The six were further identified as follows:

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1 a. Maher Mofeid HAWASH, U.S. citizen, male born in 1964, "regular"  
2 passport # [REDACTED] with a tourist visa. HAWASH's arrival date is reflected as  
3 10/30/2001, his departure date as 10/31/2001, and that he is traveling as a tourist from  
4 Urumqi to Kashgar. He is assigned to room 303 at the Chini Bagh Guest House.

5 b. Jeffrey Leon Battle, U.S. citizen, male born 12/29/1949, "regular"  
6 passport # [REDACTED] with a tourist visa. Battle's arrival date is reflected as 10/30/2001, his  
7 departure date as 10/31/2001, and that he is traveling as a tourist from Urumqi to Kashgar.  
8 He is assigned to room 303 (as was HAWASH) at the Chini Bagh Guest House.

9 c. Patrice Ford, U.S. citizen, male born 09/03/1971, "regular" passport  
10 # [REDACTED], with a tourist visa. Ford's arrival date is reflected as 10/30/2001, his departure  
11 date as 10/31/2001, and that he is traveling as a tourist from Urumqi to Kashgar. He is  
12 assigned to room 304 at the Chini Bagh Guest House.

13 d. Ahmad Ibrahim Bilal, U.S. citizen, male born 1977, "regular"  
14 passport # [REDACTED], with a tourist visa. Ahmad Bilal's arrival date is reflected as  
15 10/30/2001, his departure date as 10/31/2001, and that he is traveling as a tourist from  
16 Urumqi to Kashgar. He is assigned to room 304 at the Chini Bagh Guest House.

17 e. Habesabdulah Falahsaoub, Jordanian citizen, male born 1965,  
18 "regular" passport # [REDACTED] with a tourist visa. Habesabdulah Falahsaoub's arrival date is  
19 reflected as 10/30/2001, his departure date as 10/31/2001, and that he is traveling as a  
20 tourist from Urumqi to Kashgar. He is assigned to room 302 at the Chini Bagh Guest  
21 House.

22 f. Muhammad Ibrahim Bilal, U.S. citizen, male born 1980, "regular"  
23 passport # [REDACTED], with a tourist visa. Ahmad Bilal's arrival date is reflected as  
24 10/30/2001, his departure date as 10/31/2001, and that he is traveling as a tourist from  
25 Urumqi to Kashgar. He is assigned to room 302 at the Chini Bagh Guest House.

26 43. Copies of hotel registration records obtained by SA Lau also reflect  
27 registrations for Battle, Ford, HAWASH, Ahmed Bilal and Muhammad Bilal at the Jing  
28 Hua Hotel in Beijing, China, with a departure date of 11/11/2001.

1           44.     A witness advised representatives of the Joint Terrorism Task Force, FBI  
2 Portland Division, that he arrived in Kashgar City, China, in approximately the later part of  
3 2001, and stayed at the Chini bagh Hotel. The witness advised that he had first traveled to  
4 Beijing, China, and then to Urumqi, China, before arriving at Kashgar City.

5           45.     The witness stated that while at the Chini bagh Hotel, he observed a group of  
6 six black American males, who were also staying at the Chini bagh Hotel. The males spoke  
7 English well and had the appearance of "warriors." The witness stated that over time he  
8 spoke with the men, that they generally stayed together, and that he frequently observed the  
9 group sitting, praying, talking, exercising, or practicing martial arts.

10          45.     The witness observed that one member of the group spoke Chinese, and he  
11 was informed by one of the group that the Chinese speaking member had spent time in  
12 China, and was married to a Chinese woman who lived with their small child in Oregon.

13          46.     The witness indicated that on one occasion he observed a meeting between  
14 the individual he believed to be the group's leader and a representative of the Pakistani  
15 government.

16          47.     The witness was provided ten photographic spreadsheets, each containing six  
17 photographs of black and Middle Eastern men. From these spreadsheets, the witness  
18 identified Ahmed Bilal, Habis Al Saoub, Jeffrey Battle, Patrice Ford, and Muhammad Bilal.  
19 The witness was shown a photospread which included a photograph of **HAWASH**, but did  
20 not identify **HAWASH**.

21          48.     The witness traveled in the company of Ron Gluckman, an independent  
22 writer living in Beijing, China, who has written for Newsweek Magazine. Specifically,  
23 Gluckman wrote an article entitled "The Portland Six: Getting Close to Afghanistan," which  
24 was published in the October 28, 2002 issue of Newsweek. In the article, Gluckman  
25 recounts having met seven men at the Chini Bagh Hotel in Kashgar, China, approximately  
26 185 miles from the Afghan border, in late October, 2001.

27          49.     Gluckman was interviewed by representatives of the Joint Terrorism Task  
28 Force, FBI Portland Division, on 12/16/2003, and was able to positively identify his

1 contacts with Battle, Ford, and Muhammad Bilal. He indicated that there were an  
2 additional three to four individuals, none of which he could identify, traveling with Battle,  
3 Ford, and Muhammad Bilal. Gluckman was not shown a photograph of HAWASH.  
4 Gluckman identified the group as a group of black males who looked like ninjas and none  
5 appeared to be of Arab decent. Gluckman spoke most with Battle and Ford and did not  
6 speak with all the members of the group. The group appeared to be trying to get over the  
7 pass to Pakistan and spoke frequently with local Muslims and Pakistani traders in Kashgar.

8 50. On November 18, 2001, HAWASH returned from Hong Kong, China, via  
9 Tokyo, Japan, to Seattle, Washington on NW flights #18 and #8.

10 51. On November 19, 2001, Patrice Ford arrived at Seattle/Tacoma International  
11 Airport aboard Asiana Airlines flight number 272 from Inchon, Seoul, South Korea.

12 52. On December 24, 2001, Muhammad Bilal arrived at Seattle/Tacoma  
13 International Airport aboard Asiana Airlines flight 272 from Inchon, Seoul, South Korea.

14 53. On January 04, 2002, at approximately 4:00 p.m., Sofiane Benziadi, was  
15 arrested for immigration violations, without incident, by the Immigration and Naturalization  
16 Service (INS) in conjunction with the Portland Joint Terrorism Task Force (JTTF). On  
17 January 08, 2002, Sofiane Benziadi was interviewed at the United States Immigration and  
18 Naturalization Service (INS). Benziadi stated that he had heard about several American  
19 males leaving the United States to travel to Afghanistan and fight beside the Taliban.  
20 Benziadi indicated that he had heard that as many as six to eight Americans had left to fight  
21 in Afghanistan.

22 54. When first asked where he had heard about the Americans leaving to fight  
23 with the Taliban, Benziadi stated he had heard people talking about the Americans while at  
24 the AsSabr Mosque (Masjid AsSabr Mosque 10323 SW 43rd Avenue, Portland, Oregon).  
25 However, Benziadi later recanted the statement about the AsSabr Mosque stating he had  
26 heard about the Americans leaving to fight alongside the Taliban from television  
27 commentary.

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1           55     Benziadi went on to explain that he had talked with Al Saoub approximately  
2 two weeks prior to the interview. He indicated that Al Saoub had telephoned him at his  
3 apartment (██████████ Street, Apartment ██████ Portland, Oregon) at approximately  
4 4:00 a.m. from an unknown location. Benziadi stated that their conversation at that time  
5 was one of a general nature regarding how each was doing. Al Saoub never stated where he  
6 was calling from and would never say much during the telephone conversations because Al  
7 Saoub was afraid that Benziadi's telephone was being monitored by the Federal Bureau of  
8 Investigation.

9           56     On February 5, 2002, at approximately 10:10 a.m., U.S. Customs Service  
10 (USCS) inspectors at the San Francisco International Airport referred Jeffrey Leon Battle  
11 for a secondary inspection at the Federal Inspection Site immediately following his arrival  
12 back in the United States onboard Korea Air Flight 23 from Seoul, Republic of Korea.  
13 Following the secondary inspection, Battle was interviewed by Special Agents of the USCS.

14           57.     Battle informed the interviewing agents that he departed the United States  
15 for Hong Kong on October 18, 2001 on the first leg of a trip to Bangladesh to attend an  
16 Islamic "istama" designed to rebuild Battle's Islamic faith. Battle stated that he had  
17 originally wanted to go to Pakistan, but could not attend the "istama" in Pakistan. Battle  
18 traveled from Hong Kong to China, and then from China to Bangladesh where he arrived on  
19 November 18, 2001. Battle remained in Bangladesh for the duration of his trip until his  
20 departure on February 2, 2002. Battle stated unequivocally that he had no connection to or  
21 sympathy for any Muslim terrorist group, nor was he associated in any way with anyone  
22 who belonged to such a group.

23           58.     At approximately 11:00 a.m., USCS agents concluded the interview of  
24 Battle. Copies were made of documents in Battle's possession and forwarded to Portland  
25 Division. Review of the copies of Battle's United States passport, number ██████████,  
26 confirmed his travel to Hong Kong, China, Bangladesh, and the Republic of Korea. Battle's  
27 ///  
28 passport was issued by the Seattle passport agency on December 22, 1999, and expires on

1 December 21, 2009. The passport contains the following information:

2 Entered Hong Kong on October 18, 2001

3 Visa for the People's Republic of China issued October 22, 2001

4 Departed Hong Kong on October 27, 2001

5 Entered Beijing on October 27, 2001

6 Visa from the Embassy of the People's Republic of

7 Bangladesh in Beijing, issued on November 13, 2001

8 Departed Beijing on November 17, 2001

9 Entered Bangladesh on November 18, 2001

10 Departed Bangladesh on February 02, 2002

11 Entered Hong Kong on February 03, 2002

12 Departed Hong Kong on February 03, 2002

13 Entered Republic of Korea on February 04, 2002

14 Departed Republic of Korea on unknown date, 2002

15 59. The following documents were also found in Battle's possession:

16 a. Two Western Union Money Transfer receipts directed to Battle,  
17 address Kakrail Masjid, Dhaka, Bangladesh, from October Lewis via the National Bank  
18 Ltd. Bangladesh. The receipts are dated December 27, 2001 and January 23, 2002. The  
19 receipts total \$470.00 (US).

20 b. Three Western Union Money Transfer receipts directed to Battle  
21 from October Lewis via the China Post International Money Transfer. One of the receipts  
22 lists Jing Hua Hotel, Room 07, as the address for Battle. The other two receipts do not list  
23 an address for Battle. The receipts total \$900.00 (US).

24 60. On January 31, 2002, S#1 advised that he/she was aware of an area located  
25 near Vernonia, Oregon that several Middle Eastern males had used for target practice. S#1  
26 stated that Ali Khaled Steitiye, Habis Al Saoub, and others had all shot weapons in an area  
27 southwest of Vernonia, Oregon.

28 61. On March 7, 2002, S#2 advised that when Muhammad Bilal returned to the

1 United States, his wife no longer wanted to have anything to do with him. Because he had  
2 been married longer than either Ford or Ahmed Bilal and had recently had a new baby,  
3 Muhammad Bilal was reluctant to leave to fight in Afghanistan. Ahmed Bilal managed to  
4 persuade Muhammad Bilal after speaking to him at great length and manipulating Islamic  
5 scriptures to make it seem like the right thing to do. Muhammad Bilal is a "follower," and  
6 S#2 believed that he never would have left to fight if it had not been for Ahmed Bilal.

7 62. On March 21, 2002, S#2 advised that Ahmed Bilal was communicating with  
8 his wife, who was located in Oregon, via cyber café chat lines. S#2 also advised that  
9 Muhammad Bilal knows where Ahmed Bilal is located, and is sending money to Ahmed  
10 Bilal. S#2 did not know how Muhammad Bilal was getting money to Ahmed Bilal, but  
11 believed that he is sending the money via a transfer agency such as Western Union.

12 63. On April 15, 2002, S#1 stated that he/she had been recently introduced to a  
13 black American male who had converted to Islam and who was currently attending the  
14 Masjid AsSabr Mosque. The individual called himself "Ahmed Ali". Your Affiant has  
15 identified Ahmad Ali as an alias for Jeffrey Leon Battle. Battle was introduced to S#1 by  
16 Elmahjoub Boulhanna while at the mosque.

17 64. S#1 explained that after being introduced to Battle he/she remained with  
18 Battle and Boulhanna while the two continued their conversation. The conversation was  
19 generally centered around the need for the Muslim community to carry on a jihad against  
20 the "kaffir" (non-believers). Battle was overheard to state that there was no such thing as  
21 peace when it came to carrying out the jihad. Battle pointed out that Muslims should not be  
22 afraid of what God has told them to do (jihad against the kaffir).

23 65. On April 22, 2002, S#1 was informed by Boulhanna that Al Saoub was last  
24 known to be in Afghanistan. Boulhanna indicated that he had learned of Al Saoub's  
25 whereabouts from Battle who was living with Boulhanna at 9871 SW 35th Avenue,  
26 Apartment 32, Portland, Oregon. S#1 stated that Battle, Battle's wife, October Martinique  
27 Lewis, and their child were living in Boulhanna's apartment at 9871 SW 35th Avenue,  
28 Apartment 32, Portland, Oregon. Boulhanna and his family have since left the United

1 States.

2 66. Boulhanna provided S#1 with the following information that was originally  
3 provided to Boulhanna by Battle:

4 67. Al Saoub made his way (alone) through China to its border with  
5 Afghanistan. Al Saoub was unable to cross into Afghanistan and returned to Pakistan.  
6 While in Pakistan Al Saoub married a Pakistani woman who helped Al Saoub cross into  
7 Afghanistan. Al Saoub had not been heard from since crossing into Afghanistan.

8 68. On May 01, 2002, S#1 made contact with Battle and another individual. S#1  
9 had been contacted telephonically by Battle that same day regarding some repairs that were  
10 needed on the brake system of Battle's 1986 blue Buick two door bearing Oregon license  
11 plate number NBT750. S#1 agreed to meet with Battle that day at Battle's residence at 1:00  
12 p.m. S#1 met Battle at [REDACTED] Avenue, Apartment [REDACTED] Portland, Oregon as had been  
13 agreed.

14 69. While at his residence, Battle stated to S#1 that he was a very close friend of  
15 Al Saoub, and that they were like brothers.

16 70. Battle explained to S#1 that he had initially been thinking about taking some  
17 type of terrorist action against the American people while still in the United States. Battle  
18 referred to the American people as "kaffirs" (non-believers) and the United States as the  
19 "kaffir's home land." Battle pointed out that Al Saoub had talked Battle out of carrying out  
20 a terrorist act in the United States and convinced Battle to instead go to Afghanistan and  
21 join in the jihad being carried on there against the United States and its allies.

22 71. Battle stated that he trusted Al Saoub as Al Saoub had fought in Afghanistan  
23 against the Soviet Army and was a former Mujahadeen fighter. Further, Battle stated that  
24 due to Al Saoub's past participation in the Afghan war against the Soviets, Al Saoub had  
25 connections in Afghanistan who could provide Al Saoub and Battle with the arms,  
26 ammunition, and supplies needed to fight in the jihad.

27 ///

28 72. Battle explained that an individual who wished to join in the jihad against

1 the kaffir and the kaffir's home land had to have a mind set that allowed nothing else to  
2 matter. Battle stressed that nothing else could matter, or be of more importance in the  
3 individual's mind than the jihad, not money nor any other thing.

4 73. Battle stated to the S#1 that Battle had attempted to go to Afghanistan and  
5 fight but was not able to do so. Battle indicated that in his attempt to enter into Afghanistan  
6 he had gone through China, Pakistan and Bangladesh. Battle stated that his attempts to  
7 enter Afghanistan were not successful and he returned to the United States.

8 74. Battle pointed out to S#1 that he had recently learned of a way into  
9 Afghanistan through Bangladesh. Battle indicated that he intended to work until he had  
10 saved enough money to accomplish his goal of fighting in Afghanistan, and stated that he  
11 felt that it was stupid for any Muslim to stay in the United States.

12 75. Battle expressed an interest in acquiring a Kalashnikov assault rifle (AK 47)  
13 and a 45 caliber semi-automatic handgun for himself, as well as a 9mm semi-automatic  
14 handgun for his wife. Additionally, Battle expressed a desire to acquire hand grenades.  
15 Battle indicated that at the present time he and his wife possessed no weapons.

16 76. Battle stated to S#1 that he had joined the United States Army to learn how  
17 to fight and indicated that once he had learned what he could from the Army, he left it.

18 77. At one point during the meeting, Battle and S#1 left Battle's residence to test  
19 drive Battle's Buick and evaluate its brake problem, and drove to the Masjid AsSabr  
20 Mosque where they met with another individual. The three entered into a conversation in  
21 the parking area of the mosque.

22 78. During the conversation, Battle stated that the terrorist attacks against the  
23 World Trade Center and Pentagon were not enough. Battle went on to indicate that the  
24 terrorist attacks should also have been directed towards "Wall Street" in order to cripple the  
25 United States' financial system.

26 79. Battle stated that Boulhanna had been assisting the families of the  
27 Mujahadeen fighters who had gone to carry out the jihad in Afghanistan. Boulhanna was  
28 also the individual who provided the money for Battle, Muhammad Bilal, and other

1 Mujahadeen fighters to return to the United States. Boulhanna had gained the necessary  
2 funds from his Muslim brothers in the Portland, Oregon area.

3 80. Battle expressed a need for the establishment of a true Islamic government.  
4 Battle stated to the S#1 that he followed Islam only and did not stand with any country that  
5 fought against Islam.

6 81. On May 8, 2002, S#1 met with Battle at Battle's residence. A consensual  
7 recording of this meeting was conducted by S#1. The relevant details of this recording are  
8 as follows:

9 82. Battle and S#1 were looking at several guns which belonged to S#1 and  
10 discussing different models and calibers. Battle stated he learned to shoot an M16 in the  
11 United States Army, and that his brother, Abu Hassan (Steitiye), had an SKS. Battle told  
12 S#1 about the day they were shooting guns at a gravel pit and were contacted by a police  
13 officer. They were shooting automatic weapons that made a lot of noise. Battle stated that  
14 they were going to "pop" the cop if he wasn't cool. However, the cop turned out to be one  
15 of those guys that love guns and that "saved his butt." Battle stated that his wife got rid of  
16 his 9mm when he was out of the country because she needed money.

17 83. Battle and S#1 discussed Battle's trip overseas. Battle stated he has not lost  
18 his feeling to fight over there but only returned because he could not get into Pakistan.  
19 Battle stated that Al Saoub was the only one who was able to get over there. The Chinese  
20 would not sell Battle a ticket to get into Pakistan and they were unable to obtain a visa in  
21 Beijing. Therefore, Battle ended up in Bangladesh. He explained that he could take his  
22 family there and still be active in the struggle. His intention was to go into the Tablighi  
23 Jamaat and be sent from Jamaat to Pakistan.

24 84. Battle and S#1 spoke about the people who donated money. Battle stated  
25 that was part of the problem, because he could have stayed there and not had to come back  
26 if he had more money backing him up. His intent was to enter into jihad and never leave it  
27 once he entered. Another reason he had to come back was to get his son's passport so he  
28 could take his family back. While he is the United States he considers himself to be what

1 he calls "undercover" (not wearing his turban) and "behind enemy lines," and able to do  
2 things on a different level. At one time they had a plan, but Abu Hassan (Steitiye) started  
3 tripping and accused Battle of working for the FBI, and there was a question in Battle's  
4 mind if it was right to do it. Battle stated, however, in his heart he knew it was right  
5 because of the Muslim brothers in Palestine that are getting slaughtered, and all of the  
6 money they get to buy weapons is from the Jews in the United States. Battle stated, "So if  
7 every time they hurt or harm a Muslim over there, you go into that synagogue and hurt one  
8 over here."

9 85. S#1 asked Battle if he was going to do it individually, and Battle stated they  
10 were going to hit them all at the same time. Battle stated that they were going to get  
11 bulletproof vests and automatic weapons. He explained that if they were to die, they would  
12 become martyrs. Battle stated that they cased their schools and synagogues; they cased  
13 everything, but it didn't happen. Battle explained how they rode around checking it out.  
14 Battle stated that their plan was serious. Battle stated they needed to make plans so they  
15 could survive, but they were willing to get caught if they could do (that is, kill) at least 100  
16 or 1,000, big numbers.

17 86. On May 9, 2002, S#1 met with Battle at Battle's residence. A consensual  
18 recording of this meeting was conducted by S#1. The relevant details of this recording are  
19 as follows:

20 87. Battle and S#1 discussed jihad. Battle told S#1 that the Imam (of Masjid  
21 AsSabr Mosque) is a good brother who had fought in the jihad and went to prison in  
22 Pakistan. Battle further advised S#1 that the Imam had prepared others to fight the jihad  
23 against Russia.

24 88. Battle told S#1 how he traveled overseas, flying from Seattle to San  
25 Francisco, then San Francisco to Korea via Korean Airlines, and then from Korea to Hong  
26 Kong. It was in Hong Kong where they obtained visas to China, and traveled from Hong  
27 Kong to Beijing. Battle stated that once in China, they traveled to "the border," but could  
28 not get across the border. Battle told S#1 that since they could not cross the border, he later

1 decided to go to Bangladesh. Battle also told S#1 that Abu Tarek (Al Saoub) had married a  
2 Pakistani woman and obtained a student visa to enter Pakistan. Battle stated that Abu Tarek  
3 (Al Saoub) had previously been with the Tablighi Jamaat.

4 89. Battle and S#1 discussed suicide attacks, and Battle stated that he did not  
5 want to conduct a suicide attack. Battle stated that he would rather go in and shoot people,  
6 killing as many as he could, and then be able to see what he had done.

7 90. On May 15, 2002, S#1 met with Battle at Battle's residence. A consensual  
8 recording of this meeting was conducted by the S#1. The relevant details of this recording  
9 are as follows:

10 91. Loose plans were made for S#1 and Battle to go shoot guns. The  
11 conversation then turned to computers and Battle mentioned his computer would not boot  
12 up. S#1 examined the computer and stated to Battle that the easiest solution would be to  
13 trade up to a better system. S#1 could handle the arrangements, which included removing  
14 the faulty computer from Battle's premises immediately. A price of about \$300.00 was  
15 discussed and Battle agreed to the arrangements. Battle provided S#1 with his computer in  
16 a trade for a new computer, and S#1 departed Battle's residence with the computer.

17 92. On May 15, 2002, S#1 provided me the computer processing unit (CPU) which  
18 belonged to Battle.

19 93. On May 20, 2002, U.S. Magistrate Judge Donald C. Ashmanskas, signed a  
20 search warrant for Battle's computer. The following information does not necessarily  
21 constitute all of the information contained on the hard drive of Battle's computer.

22 94. Analysis of Battle's computer revealed that Battle appeared to use an e-mail  
23 account located at Yahoo!.com under the electronic mail name of  
24 ahmaddontplayme\_2000@yahoo.com subscribed to Mr. Ahmad Ali Battle of Portland,  
25 Oregon. The account was created on March 28, 2000, and was active.

26 95. A search of the computer revealed numerous e-mails to and from different  
27 people, including Lewis, and to and from Battle while he was in China, Hong Kong and  
28 Bangladesh. In various e-mails Battle advised Lewis about some of the difficulties he has

1 had in trying to get in to Pakistan. In one e-mail from China for example, Battle explained  
2 that he attempted to receive a visa into Pakistan, but was denied. He informed Lewis that  
3 this was to be one of his last attempts. It is believed that Battle was referring to his attempts  
4 to enter into Afghanistan. Battle wrote, "I tried to receive an visa to pakistand[sic] and was  
5 refused entry. This was one of the last atempts[sic] ." Battle explained to Lewis that he was  
6 faced with the decision to either return to the United States, "the land of the kafir (non-  
7 believers), move to a Muslim land, "close to the work of Allah," or move to a land where he  
8 could "get things set up for you and Isa to meet me at a later date."

9 96. In additional e-mails Battle references being in Jamaat and "with the Jamaat  
10 brothers" and how it has taught him so much. This is possibly a reference to the Tablighi  
11 Jamaat. Battle also advises Lewis that possibly three of the "brothers" could have made it.  
12 Battle also discusses Lewis sending him money.

13 97. On June 04, 2002, S#1 met with Battle at Battle's residence. A consensual  
14 recording of this meeting was conducted by S#1.

15 98. Battle advised S#1 that Abu Tarek (Al Saoub) was in the trenches fighting.  
16 Battle and S#1 discussed the tensions in Kashmir between India and Pakistan. Battle stated  
17 that he wants to get back to fight in jihad.

18 99. Battle advised S#1 that when "they" were out on their mission they trained  
19 every day with equipment. Battle stated that he is humiliated by leaving jihad to return to  
20 America because America is the enemy.

21 100. On June 6, 2002, S#1 met with Battle, Ford, and another individual at the  
22 Islamic Center of Portland, located at 10323 SW 43rd Avenue, Portland, Oregon, and the  
23 Dunkin Doughnuts restaurant, located at 10010 SW Barbur Boulevard., Portland, Oregon.  
24 A consensual recording of this meeting was conducted by S#1. The relevant details of this  
25 recording are as follows:

26 101. S#1, Battle, and another spoke about the current situation in Afghanistan.  
27 Ford arrived later at the Dunkin Doughnuts, and the conversation returned to the war in  
28 Afghanistan. S#1 told them that he/she does not feel that anything was accomplished by

1 bombing the World Trade Center or the two American Embassies in Africa. Battle  
2 responded by saying, "We accomplished a lot." Battle continued to state it had helped in  
3 forcing people to recognize Islam and the Koran. Battle continued by saying that these  
4 bombings also caused Muslims "to wake-up" and decide if they want to be "kaffirs" or they  
5 want to be Muslims.

6 102. Ford started comparing the war between the Mujahadeen and the Russians in  
7 Afghanistan to the war between the Mujahadeen and the United States. Ford stated that the  
8 Americans, "Targeted the civilians purposely because they knew that the Taliban would  
9 never sit there and let the people be killed like that."

10 103. On June 13, 2002, S#1 met with Battle outside of Battle's residence. A  
11 consensual recording of this meeting was conducted by S#1.

12 104. The conversation between the two then turned to Battle's attempt to fight in  
13 Afghanistan. Battle stated that he and other individuals had gone overseas in phases, and in  
14 "batches." Battle stated that he and Abu Tarek (Al Saoub) left first. They were followed  
15 approximately one to two weeks later by a second group of three "African American  
16 brothers." A third group followed the second group approximately one to two weeks later.  
17 The three groups later united at an unidentified location.

18 105. Battle described one of the men, a Palestinian, who went to fight as being  
19 part of the "third batch." Battle stated that the Palestinian eventually contacted and began to  
20 spend time with the Talbighi Jamaat, and that the Palestinian's only intention was to fight  
21 with the Taliban in Afghanistan, but when he could not get into Afghanistan to do so, he  
22 returned to the U.S. "...One of the brothers man, Allah just...he was here, he was a  
23 Palestine and he came in, he married to a white woman too.". Battle added that after the  
24 Palestinian started attending mosque, "...from that, from that waking alone, just from  
25 gradually waking him up like that he went to the next level that he left with us to go fight.  
26 He was actually, he was all training before, you know, with that intention and he came up  
27 and all of us , he left and that brother there humdilah every day he was studying, you know,  
28 while that while we was out...but yeah, just those brothers like that man, I just, um, but his

1 attention was only for that, that, that one, that Afgan after that it was always, I am out of  
2 here, I am going home. But that's all he wanted to do...he found out we couldn't  
3 ...(unintelligible). CW1 asked "He was a Palestinian?" Battle replied "Yeah, a Palestinian."

4 106. Battle pointed out, as he talked about the groups leaving the United States,  
5 that Ford was one of the individuals who had gone to fight with the Taliban forces against  
6 the U.S. forces. He also pointed out that others had not gone to fight with any of the  
7 groups.

8 107. During his post arrest interview on October 4, 2002, Battle admitted that his  
9 intentions were to go to fight in the Jihad in Afghanistan against American forces and  
10 coalition troops, and that he had planned on martyring himself on the battlefield in  
11 Afghanistan. Battle described traveling with Ford, Muhammad and Ahmed Bilal, Al  
12 Saoub, and described another person who was with them. Battle stated he could not  
13 remember this person's name, but he was a Palestinian male who attended the Bilal  
14 Mosque. Battle stated that this person came back to the United States soon after they failed  
15 to cross the border.

16 108. On June 24, 2002, U.S. Magistrate Judge Janice M. Stewart, District of  
17 Oregon, signed a search warrant, case number 02-M-488, for the e-mail account of  
18 JeffreyLeon Battle using the electronic mail account ahmaddontplayme\_2000@yahoo.com.  
19 The search warrant produced, among other numerous e-mails, the following pertinent e-  
20 mail message relating to the financial support provided by October Lewis to Battle while he  
21 was overseas trying to enter Afghanistan to fight for the Taliban and Al Qaida:

22 109. On October 26, 2001, Khadijah (October Lewis) using  
23 khadijah\_Battle@email.com wrote an e-mail message to  
24 ahmaddontplayme\_2000@yahoo.com stating "...I sent you \$100.00 through western  
25 union...". On November 12, 2001, using the same electronic mail addresses Khadijah  
26 (October Lewis) wrote a message stating "...The brother said that I had 1000 left to send  
27 that is not true, I have 760.00 left to send. I was given the total 1374.00,I sent  
28 200.00+22.00 fee, 300+29.00 fee, 400.00+34.00fee, and Inshallah I will send

1 360.00+29.00...". Again on December 15, 2001, using the same electronic email  
2 addresses, Khadijah (October Lewis) wrote a message stating "...I sent you three hundred  
3 dollars the money control number is 839-288-9004." Later on January 23, 2002, using the  
4 same electronic mail addresses, Khadijah (October Lewis) wrote another message stating  
5 "...here is you money transfer number 839-906-6595, I sent 100.00..."

6 110. On July 25, 2002, a source (hereinafter referred to as S#5), who is a person  
7 who is in regular contact with Muhammad Bilal, advised that prior to November, 2001, S#5  
8 had been living with Muhammad Ibrahim Bilal for about two years. S#5 provided the  
9 following information:

10 111. Muhammad Bilal never married S#5, however, Muhammad Bilal is the  
11 father of the S#5's son. After his son's birth Muhammad Bilal began to practice his Muslim  
12 faith more intensely, gradually becoming more fundamental and radical as time went on. At  
13 about the same time, S#5 also became a practicing Muslim. The S#5 continued to practice  
14 the Muslim faith for about one year before abandoning it completely. During the time S#5  
15 and Muhammad Bilal were living together they attended the Bilal Mosque, located in  
16 Beaverton, Oregon.

17 112. S#5 stated that sometime in October 2001, Muhammad Bilal left the United  
18 States with other individuals he claimed were going to Saudi Arabia to study.

19 113. Muhammad Bilal has a brother named Ahmed Bilal. S#5 stated on  
20 September 11, 2001, after the terrorist attacks on the World Trade Center and the Pentagon,  
21 Ahmed Bilal stopped by their (S#5 and Muhammad Bilal's) apartment. While he was there,  
22 Ahmed Bilal stated that "all those Jewish people deserved to rot and die." Muhammad  
23 Bilal and Ahmed Bilal both continued talking about the attacks and commenting to each  
24 other that the attacks were a good thing. Their comments and attitudes towards the attacks  
25 and the loss of life "shocked" S#5.

26 114. The exact amount of money Muhammad Bilal and Ahmed Bilal took with  
27 them when they left the United States was not known by S#5. Ahmed Bilal, however, was  
28 overheard by S#5 stating that he had in his possession a sum of money totaling

1 approximately \$3,000.00. Ahmed Bilal indicated that the money had allegedly been  
2 donated by the "brothers" at the Bilal Mosque. Apparently, the "brothers" at the Bilal  
3 Mosque had been led to believe by Muhammad Bilal and Ahmed Bilal that the two were  
4 traveling to Saudi Arabia to attend school there.

5 115. After Muhammad Bilal left the United States, S#5 believed, due to  
6 correspondence from Muhammad Bilal, that Muhammad Bilal and Ahmed Bilal, had  
7 reached Hong Kong. The correspondence took place in the form of both e-mail and written  
8 letters. Muhammad Bilal utilized the e-mail account, muhammedbilal333@hotmail.com, to  
9 keep in contact with S#5. The e-mail was very general in nature and generally consisted of  
10 Muhammad Bilal stating that he missed S#5 and his son. In his correspondence,  
11 Muhammad Bilal did not state anything relating to a Jihad or his intention of fighting in a  
12 Jihad. The written letters, post marked Hong Kong, were also somewhat general in nature.  
13 One letter contained \$50.00. In that letter, Muhammad Bilal specifically indicated that the  
14 \$50.00 was to be used for his son's needs.

15 116. According to S#5, on December 24, 2001, S#5 received a cellular telephone  
16 call from Muhammad Bilal from the Portland International Airport, Portland, Oregon.  
17 Muhammad Bilal wanted S#5 to pick him up at the airport, but S#5 refused to do so.

18 117. S#5 provided the interviewing agents an envelope containing a handwritten  
19 letter from Muhammad Bilal to S#5 and the son. The envelope is addressed to S#5 with a  
20 return address in the name of Muhammad Bilal at the same address as S#5. The envelope  
21 was postmarked in Hong Kong, China on November 22, 2001. In the letter, Muhammad  
22 Bilal confirmed he departed the United States on October 20, 2001.

23 118. On July 31, 2002, MSN Hotmail provided information pertaining to Hotmail  
24 e-mail account muhammedbilal333@hotmail.com. The account is subscribed to by  
25 Muhammad Bilal, birth year of 1980, of Oregon, zip code 97006. The account was  
26 registered on December 07, 1999, and is an active account that has been utilized as recently

27 ///

28 as July 30, 2002. As noted in paragraph 10, Muhammad Bilal's date of birth in January 26,

1 1980.

2 119. On August 06, 2002, U.S. Magistrate Judge John Jelderks, District of  
3 Oregon, signed a search warrant for the e-mail account of Muhammed Bilal using the  
4 electronic mail account muhammedbilal333@hotmail.com. The following pertinent e-mail  
5 messages were obtained pursuant to the warrant:

6 120. On November 30, 2001, Muhammed Bilal received an e-mail message at  
7 muhammedbilal333@hotmail.com from his girlfriend using misterrayyan@yahoo.com.  
8 Within the message, was a message from Muhammed Bilal to S#5. Muhammed Bilal  
9 advised that he will be returning to the United States earlier than he thought he would.  
10 Muhammed Bilal wrote, "My plan to coming back has been advanced to an earleaved time  
11 In Sha Allah." The message continued, "...I'm on my whay home sooner than i thought..."

12 On November 12, 2001, Khadijah (October Lewis) received an e-mail message at  
13 khadijah\_Battle@email.com from Abu Isa Ahmad Ali (Battle) using  
14 ahmaddontplayme\_2000@yahoo.com entitled, "New direction a new place to live a new  
15 beginning!" Battle explained that he attempted to receive a visa into Pakistan, but was  
16 denied. It is believed that Battle was referring to his attempts to enter into Afghanistan.  
17 Battle wrote, "I tried to receive an visa to pakistand and was refused entry. This was one of  
18 the last atempts ."

19 121. On May 12, 2002, Muhammed Bilal received an e-mail message at  
20 muhammedbilal333@hotmail.com from Ahmed Bilal using alfatih37@hotmail.com.  
21 Ahmed Bilal wrote, "Assalamu alaikum, How are you Muhammed? and how is all the  
22 brothers there? I have not heard much from you.... I hope that you are not hanging out wth  
23 any shayateeeeeeen (devils) there... remember that you are a mujahid.. assalamu alaikum.  
24 love, Ahmed." "Mujahid" is the singular form of the word Mujahadeen.

25 122. On June 01, 2002, Muhammed Bilal received an e-mail message at  
26 mib20006@yahoo.com and muhammedbilal333@hotmail.com from Ahmed Bilal using  
27 alfatih37@hotmail.com. Ahmed Bilal wrote in part, "insha Allah you are not messing up  
28 over there.. remember ..you have a mission that you have to complete.. have you made any

1 contacts with any of the good brothers over there ?? or have they made any contact with  
2 you at all .."

3 123. On June 22, 2002, Muhammed Bilal received an e-mail message at  
4 muhammedbilal333@hotmail.com from Ahmed Bilal using alfatih37@hotmail.com.  
5 Ahmed Bilal wrote in part, ".. and Muhammed, do go to those who are good people... are  
6 you in touch with Lamumba (Lumumba Ford) and the rest of the good brothers over there..  
7 please be."

8 124. On August 20, 2002, Muhammad Bilal was interviewed by Task Force  
9 Agents Shawn Alexander of the Drug Enforcement Administration (DEA) and Dan Lui of  
10 the Portland Police Bureau. TFA Alexander and TFA Lui posed as members of the Auto  
11 Theft Task Force (ATTF), and were investigating a large number of vehicle thefts and  
12 break-ins. On July 08, 2002, Muhammad Bilal was contacted by Portland Patrol  
13 Incorporated for being in a garage located at 730 SW 10th Avenue, Portland, Oregon,  
14 without a vehicle.

15 125. Muhammad Bilal stated that after his divorce from his wife in October 2001,  
16 he went on a vacation to China, Hong Kong, and Indonesia. Muhammad Bilal stated that he  
17 did not see much in China after he arrived because he was broke. Muhammad Bilal  
18 continued by saying that his brother and he had gone on the trip, and that it was expensive.  
19 Muhammad Bilal explained that his brother had purchased the airplane ticket for \$650.00.  
20 Muhammad Bilal provided his U.S. passport as identification, which was photocopied by  
21 TFA Shawn Alexander. The passport contained the following information:

22 Entered Hong Kong on October 21, 2001

23 Visa for the People's Republic of China issued October 25, 2001

24 Departed Hong Kong on October 27, 2001

25 Entered Beijing on October 27, 2001

26 Departed Beijing on November 17, 2001

27 Entered Hong Kong on November 17, 2001

28 Departed Hong Kong on November 22, 2001

1 Entered Indonesia on November 22, 2001

2 Departed Indonesia on December 23, 2001

3 Entered Hong Kong on December 23, 2001

4 Departed Hong Kong on December 24, 2001

5 126. The dates of travel contained in Muhammad Bilal's passport match with the  
6 dates of travel contained in Battle's passport for travel on October 27, 2001, and  
7 November 17, 2001, referenced above.

8 127. On August 23, 2002, S#5 contacted Muhammad Bilal telephonically at his  
9 residence. A consensual recording of this conversation was conducted by S#5. The  
10 relevant details of this recording are as follows:

11 128. S#5 explained to Muhammad Bilal that she was contacted by the police  
12 regarding his travel overseas. S#5 told Muhammad Bilal that she told the police that  
13 Muhammad Bilal traveled with his brother (Ahmed Bilal) and some other "black guy." S#5  
14 stated that she told the police that Ahmed Bilal paid for the trip, and told Muhammad Bilal  
15 that she was lying to the police on his behalf and complained that he did not care.  
16 Muhammad Bilal said thank you to S#5, because that is what he told S#5 to do (lie).  
17 Muhammad Bilal told S#5 that he was moving to Detroit and would be living with his  
18 sister. On August 26, 2002, S#5 drove Muhammad Bilal to Portland International Airport  
19 for a flight to Detroit, Michigan.

20 129. On August 23, 2002, a source (hereinafter referred to as S#6), who is a  
21 person who had contact with Ahmed Bilal, provided the following information:

22 130. Ahmed Bilal's behavior changed following the terrorist attacks on the World  
23 Trade Center and Pentagon on September 11, 2001. Ahmed Bilal became more militant,  
24 and openly expressed his opinion that the United States got what it deserved in the terrorist  
25 attacks of September 11, 2001. Ahmed Bilal believed that life was too easy in the United  
26 States, and there were too many chances to be bad. Ahmed Bilal also stated that the jihad  
27 was a righteous and just cause, and wished that he could be a part of it, stating, "I want to  
28 join them." Ahmed Bilal claimed to both S#6 and another source (hereinafter referred to as

1 S#7), to have met Usama Bin Laden in Saudi Arabia.

2 131. S#6 stated that in the time following September 11, 2001 until he departed  
3 the United States in October 2001, Ahmed Bilal and S#7 would argue about the righteous of  
4 the jihad. Ahmed Bilal watched videos at the Bilal Mosque about the jihad, and talked  
5 about wanting to leave to join in the jihad.

6 132. S#6 stated that Ahmed Bilal and Muhammad Bilal began to solicit funds  
7 from the members of the Bilal Mosque, allegedly for the purpose of traveling to Saudi  
8 Arabia for Ahmed Bilal to attend training to become an Imam. Ahmed Bilal and  
9 Muhammad Bilal may have raised as much as \$6,000.00 from various donors before  
10 leaving for overseas. S#6 stated that it is her belief that Ahmed Bilal and Muhammad Bilal  
11 were raising money in order to finance their travel to participate in the jihad in Afghanistan.  
12 Ahmed Bilal wanted to leave the United States to participate in the jihad.

13 133. Two days before leaving for overseas, Ahmed Bilal informed S#7 that he  
14 and Muhammad Bilal were going to Medina, Saudi Arabia. Ahmed Bilal advised S#7 that  
15 he was going to study to become an Imam. Ahmed Bilal informed S#7 of the news on a  
16 Thursday, and left on Saturday. Ahmed Bilal told S#7 that it would be permissible for them  
17 to legally divorce, but that they would stay married in Islam. Ahmed Bilal promised S#7  
18 that he would either send for her, or return to the United States in two years following his  
19 religious training. Ahmed Bilal also told S#7 that they would stay in touch via e-mail while  
20 he was overseas.

21 134. On September 4, 2002, S#1 met with Ford and assisted Ford is towing his  
22 vehicle. A consensual recording of this meeting was conducted by S#1. The relevant  
23 details of this recording are as follows:

24 135. S#1 told Ford that it was Elmahjoub who told S#1 that Ford and the others  
25 had tried to go to Afghanistan to fight jihad, not Battle. Ford then told S#1 that he told  
26 Battle to keep quiet about it and not to tell everybody. The conversation continued with  
27 Ford advising S#1 that they could be arrested right now for conspiracy, and if "they"  
28 searched hard enough "they" could find proof. Ford stated that with the Patriot Act "they"

1 do not necessarily need evidence.

2 136. Ford and S#1 discussed the arrest of the person who tried to set up a terrorist  
3 training camp in Oregon. As the discussion continued, Ford explained to S#1 that the  
4 reason for Abu Tarek's apparent success in entering Afghanistan was because of his  
5 patience and sincerity. The others were not successful because they were not as patient,  
6 they missed their families, and those families were not being supported by the community  
7 back home. The discussion continued:

8 S#1: And you know what, you guys don't have no training. How would you  
9 expect that just, just to go and fight jihad when you have no training? You  
10 don't know how to take a weapon down...

11 Ford: Well the brothers they train you and everything.

12 S#1: It takes time, though.

13 Ford: Not that long... they train, and plus they wouldn't, they ah... the  
14 brothers of masha (phonetic) are really good brothers, they don't put you out  
15 unless you train . . .

16 S#1: Unless you know...

17 Ford: They won't just let you get killed. When we were there, there were 12,000  
18 Pakistanis waiting at the border, waiting to cross in to help. This is when the battle  
19 we were fighting in the, ah, Tora Bora, not Tora Bora, but on the front lines in the  
20 north... and the Taliban said, 'No we are not going to let your guys in... just gonna  
21 use our own people who are experienced and trained because of the way the  
22 Americans are bombing, there would be too many casualties. So, they wouldn't let  
23 these brothers in. They said, 'No, we will just do it ourselves.' That really  
24 impressed me when I read that. It was amazing, the Chinese press, they were... they  
25 had more access to the Taliban than the Western press... They wrote it from a  
26 different perspective so they had a lot of, ah, interviews with the Taliban on the  
27 news, in the newspaper, different stories. Those brothers are really good brothers.

28 S#1: Do you think if you would have seen the fire, would you hold? Or you would

1 have...? Someday I will tell you a story about that, but would you ever thought of  
2 that?

3 Ford: What's that?

4 S#1: While you are under fire would you hold or you just run away?

5 Ford: I thought about it all the time man (laugh).

6 S#1: What's your heart tell you, really, I am honest with myself... I don't  
7 know.

8 Ford: I don't know. I would just ask Allah, don't let me be a coward and let  
9 me be steadfast...

10 137. S#1 stated that Ford's wife must have thought he was crazy to go for the  
11 jihad. Ford stated that he was surprised, because he did not expect her to understand and to  
12 get upset, but she said she understood. Ford continued that she knew how strongly he  
13 believed in Islam, and she knew it was important to him. Ford stated that he told her he was  
14 going to help the children and stuff like that.

15 138. On September 06, 2002, S#7 told law enforcement that S#7 and Ahmed  
16 Bilal were married in the Islamic religion at the Masjid AsSaber in December 2000. S#7  
17 first met Ahmed Bilal's brother, Muhammad Bilal, whom S#7 described as a "follower," at  
18 the wedding ceremony at the Masjid AsSaber. S#7 and Ahmed Bilal were legally married  
19 on January 12, 2001. Ahmed Bilal had been living in Portland, Oregon for approximately  
20 four years, when S#7 met Ahmed Bilal. Ahmed Bilal had previously lived in North  
21 Carolina and California before moving to Oregon. Ahmed Bilal was working at the Bilal  
22 Mosque, teaching Arabic and the Koran to children for approximately six months prior to  
23 meeting S#7.

24 139. S#7 and Ahmed Bilal moved into an apartment, either 22 or 27, at an  
25 apartment complex on SW Butner Road in Beaverton, Oregon following their marriage.  
26 S#7 stopped working at the ISMET in June 2001. In July or August 2001, Ahmed Bilal  
27 started to attend the Masjid AsSaber on a regular basis, rather than the Bilal Mosque which  
28 he had been attending when S#7 first met him. S#7 noticed a change in Ahmed Bilal's

1 attitude. It was also during this time period that Ahmed Bilal informed S#7 that they were  
2 moving, and moved to 3132 SW Marigold, Apartment 11, Portland, Oregon.

3 140. According to S#7, in the time period of July to August 2001, Ahmed Bilal  
4 started to train with his brother, Muhammad Bilal, and others. The training consisted of  
5 running, learning and practicing karate, and a drill in which the trainees would do sit-ups  
6 while being punched in the abdomen by an instructor. Ahmed Bilal had learned karate  
7 previously while living in Sudan. The training was conducted for approximately one to two  
8 hours in the mornings at various parks throughout the Portland metropolitan area. It was  
9 during this same time period that S#7 and Ahmed Bilal started to argue over jihad, and  
10 whether it has a religious purpose, or it is a political tool.

11 141. S#7 saw a gun case in the closet of their apartment, which she described as  
12 being black with silver trim and locks, and approximately one and a half feet long, six  
13 inches wide, and one foot tall. S#7 told Ahmed Bilal to get it out of the apartment. Ahmed  
14 Bilal informed S#7 that he had participated in some kind of weapons training with a whole  
15 group of guys following September 11, 2001.

16 142. Ahmed Bilal informed S#7 and others that he was going to fight in the jihad  
17 in Afghanistan. Ahmed Bilal stated that the training he had been participating in was for  
18 the purpose of preparing to fight in the jihad. Approximately one week before he left,  
19 Ahmed Bilal informed S#7 that he had the money necessary to travel, and that he was going  
20 to Afghanistan. Ahmed Bilal claimed that "they" had put him up to scamming others out of  
21 money by lying as to his true intent for their travel. Ahmed Bilal told people that he needed  
22 money so he and S#7, as well as Muhammad Bilal and his wife, could travel to Saudi  
23 Arabia. Ahmed Bilal told donors that he would study to become an Imam, and return to  
24 Portland, Oregon to become the religious leader at the Bilal Mosque. Ahmed Bilal also  
25 started to help S#7 in paying the rent for the apartment and buying groceries after he told  
26 her that he had received money to travel.

27 ///

28 143. Ahmed Bilal told S#7 that they (Ahmed Bilal, Muhammad Bilal, and Ford)

1 had a plan in place to enter Afghanistan, but that it would be difficult as the borders were  
2 closed. Ahmed Bilal purchased some heavy coats and mountain boots from G.I. Joe's, a  
3 sporting goods and outdoor store, because Ahmed Bilal told S#7 that it was cold in  
4 Afghanistan. Through all of this, however, S#7 was not convinced that Ahmed Bilal was  
5 going to Afghanistan, or that he would leave the United States. Ahmed Bilal had always  
6 lied to S#7, and would frequently embellish stories.

7 144. It was not until Ahmed Bilal started to pack his bags on the night of  
8 October 19, 2001, that S#7 became convinced that Ahmed Bilal was leaving. Ahmed Bilal  
9 informed S#7 that he was responsible for the money and the airplane tickets for the group  
10 that would travel to Afghanistan, which included Muhammad Bilal and Ford. Ahmed Bilal  
11 told S#7 that he wanted to go to Afghanistan so he could die fighting in the jihad and  
12 become a martyr. Ahmed Bilal informed S#7 that it did not matter how he was killed, as  
13 long as he died a martyr.

14 145. On the morning of October 20, 2001, at approximately 5:00 a.m.,  
15 Muhammad Bilal was dropped off at S#7 and Ahmed Bilal's apartment. Ahmed Bilal said  
16 goodbye to S#7 and told her that he would either send for her, or return. Ahmed Bilal,  
17 Muhammad Bilal, and Ford were driven to the airport by another "brother." S#7 did not see  
18 who the person was that drove the group to the airport.

19 146. S#7 received an e-mail message from Ahmed Bilal, utilizing Hotmail  
20 account [alfatih37@hotmail.com](mailto:alfatih37@hotmail.com), dated October 21, 2001. The e-mail message advised S#7  
21 that Ahmed Bilal was in Seoul. On October 23, 2001, S#7 received another e-mail message  
22 from Ahmed Bilal, utilizing the same Hotmail account. The e-mail message informed S#7  
23 that he was in Hong Kong, and that "we" found a good business opportunity. Ahmed Bilal  
24 wrote S#7 that "we" are going to go through to China. The final e-mail message S#7  
25 received from Ahmed Bilal was dated November 14, 2001. This e-mail message was in  
26 response to an e-mail written to Ahmed Bilal from S#7 in which she requested a divorce  
27 from Ahmed Bilal. Ahmed Bilal replied that he would grant S#7 a divorce, and that she  
28 was free to go. S#7's final contact with Ahmed Bilal was an e-mail message she sent

1 Ahmed Bilal advising him that she had received a legal divorce from him. S#7 did not  
2 receive a reply to this message.

3 147. On October 5, 2002, the day after the arrests of Ford, Lewis, Battle and  
4 Muhammad Bilal, a neighbor of HAWASH, called the FBI Portland Division and stated  
5 that his wife and he resided at [REDACTED], Hillsboro, Oregon, until approximately  
6 June 2002. The neighbor stated that his previous neighbors (to the west of his residence in  
7 a light blue house, identified as Hawash's residence) who he identified as "Michael and  
8 Lisa" (HAWASH) were close friends of Ahmed Bilal and Habis Al Saoub. He observed  
9 Bilal, Bilal's wife Corrine, and Al Saoub frequently visit Michael and Lisa's house. The  
10 neighbor further stated that Ahmed Bilal occasionally provided gardening services for him.

11 148. During a subsequent interview conducted by a representative of the JTTF  
12 approximately four months after his initial telephone call, the neighbor confirmed the  
13 identity of Ahmed Bilal from a photo spread, but was unable to identify Al Saoub.

14 149. On October 20, 2001, FBI Portland Division received a telephone call from a  
15 second neighbor of HAWASH in Hillsboro, Oregon, concerning Maher Mofeid  
16 HAWASH. The caller described HAWASH as a "Palestinian Muslim who works at Intel  
17 and is married with three children." The caller wanted to advise the FBI that HAWASH  
18 was spending more time at home following September 11, 2001, and that HAWASH was  
19 not as friendly as usual. During a follow-up interview with the second neighbor, he told  
20 investigators that following a visit by HAWASH's mother in the Spring of 2001,  
21 HAWASH changed his attire from "western" clothing to "eastern" clothing, grew a beard,  
22 and distanced himself from his neighbors. The second neighbor observed more vehicles  
23 driven by other Middle Eastern males coming and going from the residence. The second  
24 neighbor further believed that HAWASH began attending Mosque on a regular basis.

25 150. On March 20, 2003, Search Warrants were executed at HAWASH's  
26 residence, his workspace at Intel, and in two automobiles registered to Maher and Lisa  
27 Hawash.

28 151. On March 20, 2003, FBI Portland JTTF representatives interviewed Lisa

1 Hawash. Lisa Hawash stated that HAWASH had told her that he was traveling to China in  
2 order to look for software business for his privately owned Internet Service Provider (ISP).  
3 Lisa Hawash also stated that while HAWASH was in China, she received a call from  
4 Hawash in which he stated that he had talked to someone about the possibility of importing  
5 flourescent light bulbs to Nablus, Jordan from China.

6 152. On March 20, 2003, FBI Portland JTTF representatives interviewed the  
7 father of Lisa Hawash's oldest child, who was in regular contact with Lisa and Maher  
8 Hawash. According to the witness, Lisa Hawash advised him that HAWASH had traveled  
9 to China for his personal software business.

10 153. On April 14, 2003, FBI Portland JTTF representatives interviewed Youqing  
11 Ma, International Trade Manager, China, for the Oregon Economic and Community  
12 Development Department. Ma indicated that she had no previous contact with HAWASH.  
13 She further indicated that prior to traveling to China, companies or individuals are  
14 ordinarily in contact with her to assist with arrangements to conduct business in China.

15 154. On April 15, 2003, an FBI Phoenix Division representative interviewed  
16 Glenna Ryan, Lisa Hawash's mother. Ryan indicated that HAWASH traveled to China for  
17 a business opportunity. She said that HAWASH further told her he went to evaluate the  
18 possibility of establishing an import/export business making handheld microphones.

19 155. Toll records for AT&T Broadband (now Comcast) telephone numbers 503-  
20 [REDACTED] (subsequently changed on 4/8/2003 to 503-[REDACTED] and 503-[REDACTED]  
21 subscribed to by Maher and Lisa Hawash, Hillsboro, Oregon, fail to indicate any calls to  
22 China prior to HAWASH leaving the country in the Fall of 2001. Additionally, AT&T  
23 wireless telephone 503-[REDACTED] subscribed to by Intel, P.O. Box 97058, known to be  
24 utilized by HAWASH during the time period 1/3/00 to 7/31/01, also fail to indicate any  
25 calls to China.

26 ///

27 ///

28 WESTERN UNION RECORDS

1           156. According to records produced by Western Union, the following transfers of  
2 money from the United States to various foreign countries occurred while Battle, Ford, Al  
3 Saoub, Mohammed Bilal, and Ahmed Bilal were outside the United States apparently  
4 traveling in an attempt to go to Afghanistan to fight against the forces of the United States:

5           a. On October 25, 2001, October Lewis in Portland, Oregon, sent  
6 \$100.00 to Battle in Hong Kong.

7           b. On October 25, 2001, one Abdullah Ibrahim Bilal in Saudi Arabia  
8 sent Ahmed Bilal money in Guangzhou, China.

9           c. On November 09, 2001, October Lewis in Portland, Oregon, sent  
10 \$200.00 to Battle in Beijing, China.

11           d. On November 10, 2001, October Lewis in Portland, Oregon, sent  
12 \$300.00 to Battle in Beijing, China.

13           e. On November 11, 2001, October Lewis in Portland, Oregon, sent  
14 \$400.00 to Battle in Beijing, China.

15           f. On November 12, 2001, October Lewis in Portland, Oregon, sent  
16 \$360.00 to Battle in Beijing, China.

17           g. On November 20, 2001, one day after he returned to the United  
18 States, Ford in Portland, Oregon, sent \$500.00 to Al Saoub in Guangzhou, China.

19           h. On November 21, 2001, someone using the name Mohammed Bilal  
20 in Portland, Oregon, sent \$850.00 to Ahmed Bilal in Hong Kong. The spelling of the  
21 sender's name, *Mohammed* Bilal is different than Muhammad Bilal. It should also be noted  
22 that Muhammad Bilal did not return to the United States until December 24, 2001.

23           i. On November 23, 2001, in Portland, Oregon, one Larry Jackson of  
24 5760 SW Gateway Drive, Portland 97223, telephone number (503) [REDACTED] sent \$200.00  
25 to Ahmed Bilal in Indonesia. A records check shows that the address "5760 SW Gateway,  
26 Portland," does not exist, and the telephone number (503) [REDACTED] is subscribed to by  
27 Zellerbach Paper at 9111 NE Columbia Blvd., Portland, Oregon. A mail cover at Ford's  
28 address, [REDACTED] Street, Apartment [REDACTED] Portland, Oregon, revealed mail for Larry

1 Jackson delivered on at least one occasion at that address.

2 j. On December 14, 2001, October Lewis in Portland, Oregon, sent  
3 \$300.00 to Battle in Bangladesh.

4 k. On December 24, 2001, October Lewis in Portland, Oregon, sent  
5 \$370.00 to Battle in Bangladesh.

6 l. On January 03, 2002, Ford in Portland, Oregon, sent \$483.00 to Al  
7 Saoub in Guangzhou, China.

8 m. On January 22, 2002, October Lewis in Portland, Oregon, sent  
9 \$100.00 to Battle in Bangladesh.

#### 10 PREVIOUS SEARCH RESULTS

11 157. On October 4, 2002, pursuant to the execution of a federal search warrant at  
12 [REDACTED], Apartment [REDACTED] Portland, Oregon, residence of Ford, an item of paper  
13 (1B74, item 56) was recovered which contained the notation "Maher - 73 owe." This item  
14 also contained the names "Ahmed" (aka Battle), "Ahmed/Muhammad" (Ahmed and  
15 Muhamed Bilal), "Lumumba." (Ford) and "A. Tariq" (aka Abu Tareq, aka Abu Tarek, aka  
16 Al Saoub) This document represents evidence which lists the names of five of the subjects  
17 who traveled overseas with Ford. Additionally, a business card (1B70, item 38) was  
18 recovered, on the back of which was contained the notations "Maher" and "503 [REDACTED]"  
19 Subscriber information for this telephone number indicates customer names of Lisa and  
20 Mike HAWASH, Hillsboro, Oregon.

21 158. Bank records indicate that on September 8, 2001 Maher HAWASH wrote a  
22 check from his personal account to Patrice Ford for \$105.00.

23 159. Also located at Ford's residence were numerous pieces of document  
24 evidence including internet downloaded documents titled "Jihad Unspun", the "Kurdish  
25 Jihadis", "Every Piety Jihad For The Cause Of Allah?", "Taliban and Jihad Against  
26 America", and various articles from "Taliban and Mujihadeen News". Agents also seized

27 ///

28 Ford's United States passport which confirms the above stated travel to Hong Kong and

1 China.

2 160. On October 4, 2002, pursuant to the execution of a federal search warrant at  
3 [REDACTED] Avenue, Apartment [REDACTED] Portland, Oregon, residence of Battle and Lewis, an  
4 item of paper (1B38, item 9) was recovered which contained the notation "Mahir (503)  
5 [REDACTED] Also located were numerous books, documents, video and audio recordings  
6 including a book titled "Sacred Rage The Rath Of Militant Islam", a book titled "Jihad in  
7 Islam", a book entitled the "Qur'anic Concept of War", and downloaded internet material  
8 including "Making The World Safe For Terrorism" and "Islam Ruling On Defending  
9 Muslim Land Under Attack". Agents also seized Battle's United States passport which  
10 confirms the above stated travel to Hong Kong and China.

11 161. On October 4, 2002, pursuant to the execution of a federal search warrant at  
12 [REDACTED] Dearborn, Michigan, residence of Muhammad Bilal, a page from a calendar  
13 (1B25, item 14) was located which contained the notation "Maher [REDACTED]"

14 162. At least two witnesses have advised that during approximately the first half  
15 of 2001, HAWASH helped Ahmed Bilal set-up and begin a landscaping business.  
16 Ahmed and Mohammad Bilal were associates of HAWASH and did yard work for a period  
17 of time at the residence of HAWASH and his wife Lisa.

18 163. Records obtained by court order from the Internal Revenue Service indicate  
19 that in calendar year 2000, HAWASH and his wife reported an adjusted gross income of  
20 \$357,668. The income reported is listed as primarily from HAWASH' salary at Intel  
21 Corporation. For calendar year 2001, HAWASH and his wife reported an adjusted gross  
22 income of \$184,873, again primarily from his salary at Intel Corporation.

23 164. Based upon the above information, I believe that in October of 2001  
24 HAWASH traveled with Battle, Ford, Ahmed Bilal, Muhammad Bilal and Al Saoub to  
25 Hong Kong and China in an attempt to enter Pakistan to gain entry into Afghanistan to fight  
26 against United States and allied forces. The above evidence indicates that Battle and Al  
27 Saoub left the United States and traveled to Hong Kong on October 17, 2001. Ford,  
28 Muhammad Bilal and Ahmed Bilal left the United States and traveled to Hong Kong on

1 October 20, 2001. **HAWASH** left the United States on October 24, 2001 and traveled to  
2 Hong Kong. It is likely that **HAWASH** was part of the third group as referenced by Battle  
3 in paragraphs 104 and 105 above. **HAWASH** fits the description given by Battle of an  
4 additional member of the group that traveled with them. **HAWASH** has given conflicting  
5 accounts of the kind of business opportunity he allegedly was pursuing in China, and no  
6 independent evidence exists to corroborate any business purpose of the travel. The hotel  
7 records in Shan Cheng Hotel in Urumqi and the Chini bagh Guest House in Kashgar reflect  
8 that **HAWASH's** visa was as a tourist.

9 165. Further, hotel records from Kashgar City and Urumqi, China indicate that  
10 **HAWASH** stayed at the same hotels during the same dates as Battle, Ford, Ahmed Bilal,  
11 Muhammad Bilal and Al Saoub. Records reflect that Battle shared a room with **HAWASH**  
12 at the Chini bagh Guest House in Kashgar. **HAWASH** listed an address for a guest house  
13 in Hong Kong that was located in the same building as the guest house Battle and Al Saoub  
14 stayed in. There were no records that **HAWASH** stayed at the address of the guest house  
15 he listed with the airline.

16 166. On October 9, 2001, **HAWASH** quit claimed his family home to his wife's  
17 name. On October 23, 2001, **HAWASH's** wife Lisa Hawash, opened a checking account in  
18 her name only with \$5,000 transferred from a joint account with her husband.

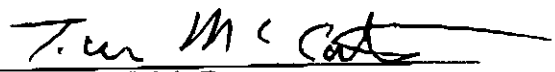
19 167. On March 20, 2003, pursuant to the execution of a federal search warrant at  
20 **HAWASH's** residence in Hillsboro, Oregon, a United States passport issued for  
21 **HAWASH** revealed that he entered Hong Kong on 10/25/2001, departed Hong Kong and  
22 entered China on 10/27/2001, and departed China and entered Hong Kong on 11/16/2001.

23 168. Based upon the above information, there is probable cause to believe that  
24 **MAHER MOFEID HAWASH** and others have engaged in several federal crimes  
25 including Conspiracy to Levy War Against the United States (18 U.S.C. § 2384);  
26 Conspiracy to Provide Material Support & Resources to Foreign Terrorist Organizations

27 ///

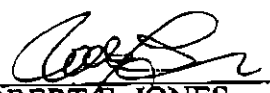
28 (18 U.S.C. § 2339B), and; Conspiracy to Contribute Services to al Qaida and Taliban (50

1 (18 U.S.C. § 2339B), and; Conspiracy to Contribute Services to al Qaida and Taliban (50  
2 U.S.C. § 1705(b); 31 C.F.R. §§ 545.204, 545.206(b), 595.204, 595.205).

3  
4 

5 Thomas W. McCartney  
6 Senior Trooper  
7 Oregon State Police  
8 Portland, Oregon

9  
10 Subscribed and sworn to before me this 29<sup>th</sup> day of April, 2003

11 

12 ROBERT E. JONES  
13 United States District Judge  
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