

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in The U.S. DISTRICT COURT at Seattle, Washington.

.....June 22, 2000.....  
BRUCE RIFKIN, Clerk  
By A. Brent Barkley Deputy

Original  
I hereby certify that this copy is a true and correct copy of the original  
of the Grand Jury  
from the Grand Jury  
of the District of Washington  
Brent Barkley  
Deputy Clerk

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,  
- Plaintiff,  
v.  
AHMED RESSAM,  
a/k/a Benni Noris, and  
ABDELMAJID DAHOUMANE,  
Defendants.

NO. CR99-0666JCC  
SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1  
(An Act of Terrorism Transcending a National Boundary)

Beginning at a time unknown but during 1998, and continuing through on or about December 14, 1999, in Canada and within the Western District of Washington, involving conduct which transcended a national boundary and utilizing a facility of foreign commerce AHMED RESSAM and ABDELMAJID DAHOUMANE knowingly created a substantial risk of serious bodily injury to another person, by conspiring to destroy or damage structures, conveyances or other real or personal property within the United States in violation of the laws of the State of Washington, that is, Chapter 9A.48 and Section 9A.28.040 of the Revised Code of Washington.

The Grand Jury further charges that to effect the object of this conspiracy one or more of the defendants committed one or more of the following overt acts within the Western District of Washington and elsewhere: the offenses charged in Counts 2-9 which are incorporated herein as if fully set forth herein.

All in violation of Title 18, United States Code, Sections 2332b(a)(1)(B) and 2332b(c).

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

COUNT 2  
(Placing an Explosive in Proximity to a Terminal)

On or about December 14, 1999, at Port Angeles, within the Western District of Washington, AHMED RESSAM and ABDELMAJID DAHOUMANE, with reckless disregard for the safety of human life, willfully placed or caused to be placed an explosive or other destructive substance in proximity to a terminal, structure or facility used in the operation of, or in support of the operation of, motor vehicles engaged in interstate or foreign commerce.

All in violation of Title 18, United States Code, Sections 33 and 2.

COUNT 3  
(False Identification Documents)

On or about December 14, 1999, at Victoria, British Columbia, Canada, in order to gain entry to Port Angeles, Washington, and continuing until his arrival in Port Angeles, Washington, within the Western District of Washington, AHMED RESSAM did knowingly possess a false identification document with the intent that such document be used to defraud the United States.

All in violation of Title 18, United States Code, Section 1028(a)(4) and (b)(3)(B).

COUNT 4  
(Use of a Fictitious Name for Admission)

On or about December 14, 1999, at Victoria, British Columbia, Canada, when applying for admission to the United States at Port Angeles, Washington, within the Western District of Washington, AHMED RESSAM knowingly did personate another and did evade or attempt to evade the immigration laws of the United States by appearing under an assumed or fictitious name without disclosing his true identity, in that AHMED RESSAM told a U.S. Immigration official he was Benni Norris, and presented a false Canadian identification document in that name.

All in violation of Title 18, United States Code, Section 1546.

COUNT 5  
(False Statement)

On or about December 14, 1999, at Port Angeles, within the Western District of Washington, in a matter within the jurisdiction of the United States Customs Service, an

1 agency of the United States, AHMED RESSAM did knowingly and willfully make a false,  
2 fraudulent, and fictitious material statement and representation; in that the defendant  
3 presented to U.S. Customs inspectors a Customs Declarations Form #6059B identifying  
4 himself as Benni Noris (date of birth: May 9, 1971), whereas in truth and fact, as he then well  
5 knew, these statements were false in that his true name is AHMED RESSAM (date of birth:  
6 May 9, 1967).

7 All in violation of Title 18, United States Code, Section 1001.

8 COUNT 6  
9 (Smuggling)

10 On or about December 14, 1999, at Port Angeles, within the Western District of  
11 Washington, AHMED RESSAM knowingly and fraudulently brought into the United States  
12 merchandise contrary to law, that is, hexamethylene triperoxide diamine, cyclotrimethylene  
13 trinitramine, and a nitroglycerine equivalent identified as ethylene glycol dinitrate.

14 All in violation of Title 18, United States Code, Section 545.

15 COUNT 7  
16 (Transportation of Explosives)

17 On or about December 14, 1999, at Port Angeles, within the Western District of  
18 Washington, AHMED RESSAM, not being a licensee or permittee under the provisions of  
19 Chapter 40 of Title 18 of the United States Code, knowingly transported and shipped, and  
20 caused to be transported and shipped, in interstate and foreign commerce, from Canada into  
21 the United States, explosive materials, that is, hexamethylene triperoxide diamine,  
22 cyclotrimethylene trinitramine, and a nitroglycerine equivalent identified as ethylene glycol  
23 dinitrate.

24 All in violation of Title 18, United States Code, Sections 842(a)(3)(A); and 844(a).

25 COUNT 8  
26 (Possession of an Unregistered Firearm)

27 On or about December 14, 1999, at Port Angeles, within the Western District of  
28 Washington, AHMED RESSAM knowingly possessed a firearm, that is, a destructive device  
as that term is defined in Title 26, United States Code, Section 5845(f), not registered to him

1 in the National Firearms Registration and Transfer Record.

2 All in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

3 COUNT 9  
4 (Carrying an Explosive During the Commission of a Felony)

5 On or about December 14, 1999, at Port Angeles, within the Western District of  
6 Washington, AHMED RESSAM knowingly carried an explosive during the commission of a  
7 felony prosecutable in a court of the United States, that is, possessing false identification to  
8 defraud the United States as charged in Count 3 herein, use of a fictitious name for admission  
9 as charged in Count 4 herein, and making a false statement to a U.S. Customs Inspector as  
10 charged in Count 5 herein.

11 All in violation of Title 18, United States Code, Section 844(h)(2).

12 A TRUE BILL:

13 DATED: *January 20, 2000*

14 *Larry Lindquist*  
15 \_\_\_\_\_  
16 FOREPERSON

17 *Katrina C. Pflaumer*  
18 \_\_\_\_\_

19 KATRINA C. PFLAUMER  
20 United States Attorney

21 *Francis J. Diskin*  
22 \_\_\_\_\_

23 FRANCIS J. DISKIN  
24 Assistant United States Attorney

25 *Andrew R. Hamilton*  
26 \_\_\_\_\_

27 ANDREW R. HAMILTON  
28 Assistant United States Attorney

29 *Steven C. Gonzalez*  
30 \_\_\_\_\_

31 STEVEN C. GONZALEZ  
32 Assistant United States Attorney

