



SEALED

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

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United States of America,
Plaintiff,
v.
Ahmad Ibrahim Al-Ahmad, aka
Ahmed Alahmedalabdalklah, aka
Ahmed Hassan Farhan, aka
Ahmad Ibrahim, aka
Ahmad Ebrahim, and aka
Ahmed Hassan Farhan,
(Counts 1 - 4)
Defendant.

CR 12 1263 PHX MVW LOA
INDICTMENT

VIO: 18 U.S.C. §§ 2332a(a)(1) and (3)
(Conspiracy to Use a Weapon of
Mass Destruction)
Count 1

18 U.S.C. §§ 844(f)(1), (2) and (n)
(Conspiracy to Maliciously
Damage or Destroy U.S.
Government Property by Means
of an Explosive)
Count 2

18 U.S.C. §§ 924(c)(1)(A) and
(B)(ii) and 2
(Possession of a Destructive
Device During a Crime of
Violence and Aiding and
Abetting)
Count 3

18 U.S.C. § 924(o)
(Conspiracy to Possess a
Destructive Device During a
Crime of Violence)
Count 4

Forfeiture Allegation

THE GRAND JURY CHARGES:

Count One

(Conspiracy to Use a Weapon of Mass Destruction)

1 At all times material to this Indictment:

2 1. Certain component parts used in Improvised Explosive Devices (IED's), employed
3 against U.S military personnel and U.S. military vehicles in Iraq, and used in furtherance of the
4 charges contained in this Indictment were originally manufactured by a company headquartered
5 in the United States, in the District of Arizona, and traveled in interstate or foreign commerce.
6 Therefore, pursuant to Title 18, United States Code, Section 3237 jurisdiction is within the venue
7 of the United States District Court for the District of Arizona. Additionally, the acts referred to
8 in this Indictment were committed in Iraq and elsewhere outside of the United States, but within
9 the extraterritorial jurisdiction of the United States and, therefore, pursuant to Title 18, United
10 States Code, Section 3238, within the venue of the United States District Court for the District
11 of Arizona.

12 2. The defendant in this case is AHMAD IBRAHIM AL-AHMAD, a Syrian national, also
13 known as Ahmed Alahmedalabdalklah, Ahmed Hassan Farhan, Ahmad Ibrahim, Ahmad
14 Ebrahim, and Ahmed Hassan Farhan, hereinafter AHMAD IBRAHIM AL-AHMAD.

15 3. Beginning in or about January, 2005 and continuing to on or about July, 2010, in Iraq and
16 elsewhere outside of the United States, defendant, AHMAD IBRAHIM AL-AHMAD, did
17 knowingly combine, conspire, confederate, and agree together and with other persons, both
18 known and unknown to the grand jury, without lawful authority, to use a weapon of mass
19 destruction, that is, a destructive device, against nationals of the United States, while such
20 nationals were outside the United States and against property that was owned, leased and used
21 by the United States outside the United States.

22 4. In furtherance of the aforesaid conspiracy and to accomplish the objects thereof,
23 defendant, AHMAD IBRAHIM AL-AHMAD, together with his co-conspirators, both known
24 and unknown to the Grand Jury, committed, among others, the following overt acts:

25 a. Beginning in or about January, 2005 and continuing to on or about July,
26 2010, AHMAD IBRAHIM AL-AHMAD procured component parts for wireless initiation
27 systems to be used in radio-controlled improvised explosive devices (IEDs) including from, but
28 not limited to, a company headquartered in the District of Arizona.

1 b. In and before August 2006, defendant, AHMAD IBRAHIM AL-AHMAD
2 utilized a house located at 50 Omar Street, Baghdad, Iraq, to manufacture parts for wireless
3 initiation systems to be used in radio-controlled IEDs which were used to target U.S. military
4 personnel and U.S. military vehicles in Iraq.

5 c. In and before August 2006, AHMAD IBRAHIM AL-AHMAD designed
6 Dual Tone Multi Frequency (DTMF) decoder custom circuit boards which were utilized in radio-
7 controlled IEDs that were used to target U.S. military personnel and U.S. military vehicles in
8 Iraq.

9 d. Beginning in or about January, 2005 and continuing to on or about July,
10 2010, Ahmad Ibrahim Al-Ahmad communicated with coconspirators, both known and unknown,
11 regarding attacks against Americans in Iraq.

12 e. Beginning in or about January, 2005 and continuing to on or about July,
13 2010, defendant, AHMAD IBRAHIM AL-AHMAD, supplied component parts to members and
14 associates of the 1920 Revolution Brigades, an Iraqi insurgent group. Those parts were then
15 used in improvised explosive devices (IEDs) that were employed against United States military
16 personnel and U.S. military vehicles in Iraq. Unknown coconspirators of defendant, AHMAD
17 IBRAHIM AL-AHMAD, then employed the component parts against U.S. military personnel
18 including, but not limited to the following:

19 i. On April 6, 2007, in the outskirts of southern Baghdad, near
20 Baghdad International Airport, three U.S. soldiers were killed in action by a cellular-phone
21 initiated IED. The IED initiator used in this incident included a DTMF custom circuit that
22 matched three circuits recovered from 50 Omar Street, Baghdad, Iraq in August 2006.

23 ii. On May 14, 2007, in northern Baghdad, approximately one-half mile
24 from the 50 Omar Street, Baghdad, Iraq, one U.S. soldier was killed in action and four wounded
25 in action by a cellular phone initiated IED. The IED electronic switch used in this incident
26 included a DTMF custom circuit that was very similar to three custom circuits recovered from
27 50 Omar Street, Baghdad, Iraq in August 2006

28 All in violation of Title 18, United States Code, Section 2332a(a)(1)&(3).

Count Two

(Conspiracy to Maliciously Damage or
Destroy U.S. Government Property by Means of an Explosive)

1. Paragraphs 1 through 4 of Count One of this Indictment are hereby incorporated by reference as if fully realleged and restated herein.

2. Beginning in or about January, 2005 and continuing to on or about July, 2010, in Iraq and elsewhere outside of the United States, defendant, AHMAD IBRAHIM AL-AHMAD, did knowingly combine, conspire, confederate, and agree together and with other persons, both known and unknown to the grand jury, to maliciously damage, destroy, attempt to damage, attempt to destroy, vehicles, used by the United States Military in Iraq, in whole and in part owned, or possessed by the United States Department of Defense, a department of the United States) by means of explosives.

All in violation of Title 18, United States Code, Section 844(f)(1), (2)&(n).

Count Three

(Possession of a Destructive Device During a Crime
of Violence and Aiding and Abetting)

1. Paragraphs 1 through 4 of Count One of this Indictment are hereby incorporated by reference as if fully realleged and restated herein.

2. Beginning in or about January, 2005 and continuing to on or about July, 2010, in Iraq and elsewhere outside of the United States, defendant, AHMAD IBRAHIM AL-AHMAD, aided and abetted other persons, both known and unknown to the grand jury, to knowingly possess a firearm, that is, a destructive device, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, Conspiracy to Use a Weapon of Mass Destruction, as set forth in Count One of this Indictment and Conspiracy to Maliciously Damage or Destroy U.S. Government Property by Means of an Explosive, as set forth in Count Two of this Indictment.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)&(B)(ii) and 2.

1 **Count Four**

2 (Conspiracy to Possess a Destructive Device During a Crime of Violence)

3 1. Paragraphs 1 through 4 of Count One of this Indictment are hereby incorporated by
4 reference as if fully realleged and restated herein.

5 2. Beginning in or about January, 2005 and continuing to on or about July, 2010, in Iraq and
6 elsewhere outside of the United States, defendant, AHMAD IBRAHIM AL-AHMAD, did
7 knowingly combine, conspire, confederate, and agree together and with other persons, both
8 known and unknown to the grand jury to commit an offense under Title 18, United States Code,
9 Section 924(c), that is, to possess a firearm, that is, a destructive device, during and in relation
10 to a crime of violence for which he may be prosecuted in a court of the United States, that is,
11 Conspiracy to Use a Weapon of Mass Destruction, as set forth in Count One of this Indictment,
12 and Conspiracy to Maliciously Damage or Destroy U.S. Government Property by Means of an
13 Explosive, as set forth in Count Two of this Indictment.

14 All in violation of Title 18, United States Code, Section 924(o).

15 **Forfeiture Allegation**

16 1. The allegations contained in Counts One through Four of this Indictment are hereby re-
17 alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18,
18 United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

19 2. Upon conviction of the offenses set forth in this Indictment, defendant, Ahmad Ibrahim
20 Al-Ahmad, shall forfeit to the United States of America, pursuant to Title 18, United States Code,
21 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or
22 personal, which constitutes or is derived from proceeds traceable to the offense.

23 3. If any of the property described above, as a result of any act or omission of the defendant:

- 24 a. cannot be located upon the exercise of due diligence;
- 25 b. has been transferred or sold to, or deposited with, a third party;
- 26 c. has been placed beyond the jurisdiction of the court;
- 27 d. has been substantially diminished in value; or
- 28

1 e. has been commingled with other property which cannot be divided without
2 difficulty,

3 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title
4 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section
5 2461(c).

6 All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

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A TRUE BILL

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/S/

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FOREPERSON OF THE GRAND JURY
Date: June 28, 2012

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13 ANN BIRMINGHAM SCHEEL
14 Acting United States Attorney
District of Arizona

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/S/

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