



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

-v- :

INFORMATION

MOHAMMED MANSOUR JABARAH, :

02 Cr.

a/k/a "Abu Hafs al Kuwaiti," :

a/k/a "Sammy," :

Defendant. :

02 CRIM. 1560

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COUNT ONE

The United States Attorney charges:

1. From in or about January 2000, through the date of the filing of this Information, in Singapore, Malaysia, the Philippines, Pakistan, Oman, and Afghanistan, and elsewhere outside the United States and outside the jurisdiction of any particular state or district, MOHAMMED MANSOUR JABARAH, the defendant, who was first brought to and arrested in the Southern District of New York, together with Usama Bin Laden and other members and associates of the groups known as *al Qaeda* and *Jemaah Islamiah*, and others known and unknown, unlawfully, wilfully and knowingly combined, conspired, confederated and agreed to kill nationals of the United States.

2. It was a part and an object of said conspiracy that the defendant, and others known and unknown, would and did murder United States nationals at the United States embassies in the Philippines and Singapore.

3. In furtherance of the conspiracy and to effect the object thereof, the defendant, and others known and unknown, committed the following overt acts, among others:

a. In or about March 2001, in Afghanistan, JABARAH, the defendant, attended terrorist training camps sponsored by *al Qaeda*;

b. In or about May 2001, in Afghanistan, JABARAH, the defendant, made "*bayat*," that is, he pledged allegiance to Usama Bin Laden;

A TRUE COPY
UNITED STATES MAGISTRATE
FOR THE SOUTHERN DISTRICT OF N.Y.
Mohammed DEPUTY CLERK



c. In or about July 2001, in Afghanistan, JABARAH, the defendant, met with Usama Bin Laden, a co-conspirator not named as a defendant herein, to convince Bin Laden of his potential as an operative for Bin Laden's terrorist group *al Qaeda*;

d. In or about August 2001, JABARAH, on instructions from Usama Bin Laden, traveled to Karachi, Pakistan and met with an individual ("Co-Conspirator #1");

e. In or about September 2001, JABARAH met another individual ("Co-Conspirator #2") in Karachi, Pakistan, who provided JABARAH with details of a terrorist operation being planned against American and Israeli targets in the Philippines, and told JABARAH that he would be working with an individual from Malaysia ("Co-Conspirator #3") and an individual from the Philippines ("Co-Conspirator #4");

f. In or about September 2001, JABARAH met with Co-Conspirator #3 and others in Kuala Lumpur, Malaysia to discuss the terrorist operation being planned in the Philippines;

g. In or about September 2001, JABARAH traveled to Manila, Philippines, where he met with Co-Conspirator #4;

h. In or about early October 2001, JABARAH met with, among others, Co-Conspirator #3, and Co-Conspirator #4 in Kuala Lumpur, Malaysia, and discussed switching the target of the terrorist operation to Singapore;

i. In or about mid-October 2001, JABARAH met with Co-Conspirator #4 and others in Singapore and conducted surveillance of numerous targets, including the American embassy;

j. In or about late October 2001, JABARAH videotaped the exteriors of the potential targets of the terrorist operation in Singapore, including the American embassy;

k. In or about late October or early November 2001, JABARAH met with co-conspirators in Kuala Lumpur, Malaysia, where it was decided that the priority targets



would be the American and Israeli embassies in Singapore and that they would be attacked using explosives;

l. In or about November 2001, JABARAH met with another individual in Kuala Lumpur, Malaysia, who provided approximately \$50,000 to JABARAH for the plot;

m. In or about late November 2001, in Kuala Lumpur, Malaysia, JABARAH met with Co-Conspirator #2 and another individual and they discussed shifting the operation back to the American and Israeli embassies in the Philippines;

n. In or about December 2001, JABARAH learned that Co-Conspirator #3 and Co-Conspirator #4 had been arrested and he fled from Asia; and

o. In or about February 2002, Co-Conspirator #1 instructed JABARAH to travel to Oman to assist in providing a safe haven for *al Qaeda* members/associates traveling from Afghanistan to Yemen.

(Title 18, United States Code, Section 2332(b).)

COUNT TWO

The United States Attorney further charges:

4. From in or about January 2000, through the date of the filing of this Information, within the special maritime and territorial jurisdiction of the United States, as well as in Singapore, Malaysia, the Philippines, Pakistan, Oman, and Afghanistan, and elsewhere outside the United States and outside the jurisdiction of any particular state or district, MOHAMMED MANSOUR JABARAH, the defendant, who was first brought to and arrested in the Southern District of New York, together with Usama Bin Laden and other members and associates of the groups known as *al Qaeda* and *Jemaah Islamiyah*, and others known and unknown, unlawfully, wilfully and knowingly combined, conspired, confederated and agreed together and with each other to kill individuals.



5. It was a part and an object of said conspiracy that the defendant, and others known and unknown, would and did: (i) kill officers and employees of the United States and agencies and branches thereof, while such employees were engaged in, and on account of, the performance of their official duties, and persons assisting such employees in the performance of their duties, in violation of Title 18, United States Code, Section 1114, including employees of the United States embassies in Singapore and the Philippines, and (ii) kill Internationally Protected Persons, in violation of Title 18, United States Code, Section 1116.

6. In furtherance of said conspiracy, and to effect the objects thereof, the defendant, and others known and unknown, committed the overt acts set forth in Count One of this Information, which are fully incorporated by reference herein.

(Title 18, United States Code, Sections 1111, 1114, 1116, and 1117.)

COUNT THREE

The United States Attorney further charges:

7. From in or about January 2000, through the date of the filing of this Information, in Singapore, Malaysia, the Philippines, Pakistan, Oman, and Afghanistan, and elsewhere outside the United States and outside the jurisdiction of any particular state or district, MOHAMMED MANSOUR JABARAH, the defendant, who was first brought to and arrested in the Southern District of New York, together with Usama Bin Laden, and other members and associates of the groups known as *al Qaeda* and *Jemaah Islamiyah*, and others known and unknown, unlawfully, wilfully and knowingly combined, conspired, confederated and agreed unlawfully to use weapons of mass destruction, to wit, bombs, against nationals of the United States while such nationals would be outside the United States and against property that is owned, leased and used by the United States and by departments and agencies of the United States.



8. It was a part and an object of said conspiracy that the defendant, and others known and unknown, would and did: (i) bomb the American embassies in Singapore and the Philippines, and (ii) bomb employees of the American Government stationed at those embassies.

9. In furtherance of said conspiracy, and to effect the objects thereof, the defendant, and others known and unknown, committed the overt acts set forth in Count One of this Information, which are fully incorporated by reference herein.

(Title 18, United States Code, Sections 2332a(a)(1) and (a)(3).)

COUNT FOUR

The United States Attorney further charges:

10. From in or about January 2000, through the date of the filing of this Information, in Singapore, Malaysia, the Philippines, Pakistan, Oman, and Afghanistan, and elsewhere outside the United States and outside the jurisdiction of any particular state or district, MOHAMMED MANSOUR JABARAH, the defendant, who was first brought to and arrested in the Southern District of New York, together with Usama Bin Laden, and other members and associates of the groups known as *al Qaeda* and *Jemaah Islamiyah*, and others known and unknown, unlawfully, wilfully and knowingly combined, conspired, confederated and agreed unlawfully to maliciously damage and destroy, and attempt to damage and destroy, by means of fire and explosives, buildings, vehicles and other personal and real property in whole or in part owned and possessed by, and leased to, the United States and departments and agencies thereof, in violation of Title 18, United States Code, Section 844(f)(1).

11. It was a part and an object of said conspiracy that the defendant, and others known and unknown, would and did: (i) bomb the American embassies in Singapore and the Philippines; and (ii) bomb employees of the American Government stationed at those embassies.



12. In furtherance of said conspiracy, and to effect the objects thereof, the defendant, and others known and unknown, committed the overt acts set forth in Count One of this Information, which are fully incorporated by reference herein.

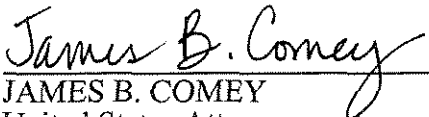
(Title 18, United States Code, Section 844(n).)

COUNT FIVE

The United States Attorney further charges:

13. In or about May 2002, in the Eastern District of New York, MOHAMMED MANSOUR JABARAH, the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit, a criminal investigation being conducted by the Federal Bureau of Investigation, unlawfully, wilfully and knowingly made a materially false and fictitious statement and representation, to wit, that the last time the defendant saw a co-conspirator in the conspiracies charged in Counts One through Four was in Bangkok, Thailand, in January 2002.

(Title 18, United States Code, Section 1001(a).)



JAMES B. COMEY
United States Attorney



Form No. USA-33s-274 (Ed. 9-25-58)

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18 U.S.C. §§ 2332(b), 1111, 1114, 1116,
1117, 2332a(a)(1) and (a)(3), 844(n),
1001(a)

JAMES B. COMEY

United States Attorney.
