	Case 2:13-cv-01804 Document	1 Filed 10/07/13 Page 1 of 12
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6	IN THE UNITED STATE	S DISTRICT COURT
7	IN THE UNITED STATE FOR THE WESTERN DIST AT SEA'	RICT OF WASHINGTON
8	AMERICAN FREEDOM DEFENSE	
9	INITIATIVE; PAMELA GELLER; and ROBERT SPENCER,	Case No.
10	Plaintiffs,	
11	-V	COMPLAINT
12	KING COUNTY,	[42 U.S.C. § 1983]
13	Defendant.	
14		
15	Plaintiffs American Freedom Defense In	nitiative (hereinafter referred to as "AFDI"),
16	Pamela Geller, and Robert Spencer (collectively	v referred to as "Plaintiffs"), by and through
17	their undersigned counsel, bring this Complaint	against Defendant King County (hereinafter
18	referred to as "Defendant" or "King County"), it	s employees, agents, and successors in office,
19	and in support thereof allege the following upon i	nformation and belief:
20	INTRODU	CTION
21	1. This case seeks to protect and vinc	licate fundamental constitutional rights. It is a
22	civil rights action brought under the First and	Fourteenth Amendments to the United States
23	Constitution and 42 U.S.C. § 1983, challenging	Defendant's restriction on Plaintiffs' right to
24	engage in protected speech in a public forum cr	eated by Defendant based on the content and
25	viewpoint of Plaintiffs' message. Defendan	t prohibited Plaintiffs from displaying an
	COMPLAINT; Case No 1	STEPHEN PIDGEON Attorney at Law, P.S. 3002 Colby Avenue Suite 306

P.S. 3002 Colby Avenue, Suite 306 Everett, Washington 98201 (425) 605-4774

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advertisement on King County property based on Defendant's assertion that Plaintiffs'
 advertisement violates its Transit Advertising Policy ("Free Speech Restriction"), which
 operates as a prior restraint on Plaintiffs' speech.

2. Plaintiffs seek a declaration that Defendant violated their clearly established constitutional rights as set forth in this Complaint; a declaration that Defendant's Free Speech Restriction violates the United States Constitution and 42 U.S.C. § 1983 as set forth in this Complaint; a preliminary and permanent injunction enjoining the enforcement of Defendant's Free Speech Restriction as set forth in this Complaint; and nominal damages for the past loss of Plaintiffs' constitutional rights. Plaintiffs also seek an award of reasonable costs of litigation, including attorneys' fees and expenses, pursuant to 42 U.S.C. § 1988 and other applicable law.

JURISDICTION AND VENUE

3. This action arises under the Constitution and laws of the United States. Jurisdiction is conferred on this Court pursuant to 28 U.S.C. §§ 1331 and 1343.

4. Plaintiffs' claims for declaratory and injunctive relief are authorized by 28 U.S.C. §§ 2201 and 2202, by Rules 57 and 65 of the Federal Rules of Civil Procedure, and by the general legal and equitable powers of this Court. Plaintiffs' claim for nominal damages is authorized by 42 U.S.C. § 1983.

5. Venue is proper under 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred in this district.

PLAINTIFFS

6. Plaintiff AFDI is an organization that is incorporated under the laws of the State of New Hampshire. AFDI is a human rights organization dedicated to freedom of speech, freedom of conscience, freedom of religion, freedom from religion, and individual rights.

7. AFDI achieves its objective through a variety of lawful means, including
through the exercise of its right to freedom of speech under the United States Constitution.

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COMPLAINT; Case No. _____

STEPHEN PIDGEON Attorney at Law, P.S. 3002 Colby Avenue, Suite 306 Everett, Washington 98201 (425) 605-4774

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8. AFDI exercises its right to freedom of speech and promotes its objectives by,
 inter alia, purchasing advertising space on transit authority property in major cities throughout
 the United States, including Seattle, Washington. AFDI purchases these advertisements to
 express its message on current events and public issues, particularly including issues involving
 global terrorism (hereinafter referred to as "AFDI's advertising campaign").

9. Plaintiff Pamela Geller is the president of AFDI, and she engages in protected
speech through AFDI's activities, including AFDI's advertising campaign.

10. Plaintiff Robert Spencer is the vice president of AFDI, and he engages in protected speech through AFDI's activities, including AFDI's advertising campaign.

DEFENDANT

11 11. Defendant King County is a municipal corporation. In the performance of its
12 governmental duties, Defendant King County operates a public transit system (King County
13 Metro Transit), which includes more than 1,400 buses.

12. As a governmental agency, Defendant is mandated to comply with the First and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983.

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STATEMENT OF FACTS

13. Defendant leases space on the exterior of its buses for use as advertising space.

14. Defendant accepts noncommercial and commercial advertisements for display on its advertising space.

15. Defendant accepts noncommercial public service, public issue, and political
issue advertisements, including advertisements on controversial issues, for display on its
advertising space.

23 16. Defendant has leased its advertising space for political and social commentary
24 advertisements covering a broad spectrum of political views and ideas.

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COMPLAINT; Case No.

17. By policy and practice, Defendant has created a designated public forum for the display of public service, public issue, and political issue advertisements on its advertising space.

18. Upon information and belief, Defendant leased its advertising space for an advertisement sponsored by the Federal Bureau of Investigation ("FBI") and / or the Joint Terrorism Task Force ("JTTF"), advertising global terrorism awareness ("FBI-JTTF Advertisement") as follows:

FACES OF GLOBAL TERRORISM

Stop a Terrorist. Save Lives. Up to \$25 Million Reward.

. قدينية ديندا رواح www.rewardsforjustice.net • rfj@state.gov • 1-800-US REWARD Patigliin ang isang terrista. Magsalba ng mga buha

19. A true and correct copy of the FBI-JTTF Advertisement is attached to this Complaint as Exhibit 1 and incorporated herein by reference.

20. Upon information and belief, the FBI-JTTF Advertisement was displayed on Defendant's buses in or about June 2013.

21. According to press reports, the FBI decided to terminate the FBI-JTTF Advertisement campaign after receiving complaints from politicians and advocacy groups that the list of wanted global terrorists pictured in the advertisement appeared to include mostly Muslim terrorists.

22. The FBI publishes a listing of the world's most wanted global terrorists on its website. That listing is located at: http://www.fbi.gov/wanted/wanted_terrorists/@@wanted-group-listing ("FBI Terrorist List"). A true and correct copy of the FBI Terrorist List is attached to this Complaint as Exhibit 2 and incorporated herein by reference.

23. The FBI Terrorist List includes pictures and "wanted posters" for thirty-two terrorists. Of the thirty-two listed terrorists, thirty are individuals with Muslim names and / or

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Jooji argagaxiso. Nafyow badbaadi. ановите террориста. Спасите жизнь. 1

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are wanted for terrorism related to organizations conducting terrorism in the name of Islam.
 True and correct copies of the wanted posters for each of the thirty-two listed terrorists are
 attached to this Complaint as Exhibit 3 and incorporated herein by reference.

24. Of the two non-Islamic terrorists, one (Daniel Andreas San Diego) has ties to animal rights extremist groups and the other (Joanne Deborah Chesimard) is an escaped murderer who was part of a revolutionary extremist organization known as the Black Liberation Party.

25. Additional advertisements accepted by Defendant for display on its advertising space include the following:

a. In or about 2012, Defendant permitted the display of a pregnancy counseling center's advertisement that was sufficiently controversial that it was vandalized by a sticker:



 b.
 In or about 2009, Defendant permitted the display of a highly politicized advertisement to "Save Gaza":

 Image: Complaint permitted the display of a highly politicized complexity of the provided permitted the display of a highly politicized politicized permitted the display of a highly politicized advertisement to "Save Gaza":

 Image: Complaint permitted the display of a highly politicized permitted the display of a highly politicized politicized permitted the display of a highly politicized advertisement to "Save Gaza":

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(425) 605-4774

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c. In or about December 2010, Defendant permitted the display of a controversial advertisement, "ISRAELI WAR CRIMES: YOUR TAX DOLLARS AT WORK," only to pull the advertisement under the credible threat of violence:



26. Accordingly, Defendant permits, as a matter of policy and practice, a wide variety of commercial, noncommercial, public-service, public-issue, and political-issue advertisements on its advertising space (hereinafter "Free Speech Policy").

27. Pursuant to Defendant's Free Speech Policy and particularly in light of the fact that Defendant permitted and displayed the FBI-JTTF Advertisement, Plaintiffs submitted for approval on or about July 30, 2013, an advertisement that was substantively similar to the FBI-JTTF Advertisement ("AFDI Advertisement").

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28. The AFDI Advertisement appears as follows:

ISRAELI WAR CRIMES



29. The AFDI Advertisement includes the identical pictures and names of the wanted global terrorists that appeared in the FBI-JTTF Advertisement.

30. A true and accurate copy of the AFDI Advertisement is attached to this
Complaint as Exhibit 4 and incorporated herein by reference.

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COMPLAINT; Case No.

31. The AFDI Advertisement presents a similar educational and public service 1 message as the FBI-JTTF Advertisement. Both advertisements alert the public of the 2 importance of stopping global terrorism by raising awareness of the threat and encouraging 3 citizens to communicate with the appropriate government agencies when they have information 4 leading to the possible whereabouts of a global terrorist. 5

32. The message of the AFDI Advertisement is very timely in light of current world 6 7 events where global terrorists are engaging in violent jihad against America's national security interests throughout the world and at home. 8

Acceptance of political- and public-issue advertisements, specifically including 9 33. Defendant's acceptance of the FBI-JTTF Advertisement, demonstrates that the forum is 10 suitable for the AFDI Advertisement. 11

34. On August 15, 2013, counsel for Plaintiffs received the following notice via 12 13 email from Mr. Scott Goldsmith, Esq., the executive vice president and chief commercial officer of Titan Outdoor LLC (a/k/a Titan360 and Titan) (hereinafter "Titan"), the advertising 14 15 agent working for and on behalf of Defendant to lease advertising space on Defendant's buses:

16 From: Scott Goldsmith [mailto:Scott.Goldsmith@titan360.com] Sent: Thursday, August 15, 2013 3:02 PM 17 To: david.yerushalmi@verizon.net Cc: rmuise@americanfreedomlawcenter.org 18 Subject: AFDI proposed ad "FACES OF GLOBAL TERRORISM" cannot be accepted. 19 David: Please see below. I am available to discuss. Thank you. Scott. 20 Scott E. Goldsmith, Esq. EVP & Chief Commercial Officer 21 100 Park Avenue 22 New York, NY 10017 T (212) 891-5688 23 F (212) 418-1082 scott.goldsmith@titan360.com 24 TITAN titan360.com 25 7

COMPLAINT; Case No.

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1 2 3 4	From: Sharron Shinbo <sharron.shinbo@kingcounty.gov> Date: Thursday, August 15, 2013 2:38 PM To: Scott Goldsmith <scott.goldsmith@titan360.com> Cc: Don Allman <don.allman@titan360.com>, Pamela Quadros <pamela.quadros@titan360.com> Subject: AFDI proposed ad "FACES OF GLOBAL TERRORISM" cannot be accepted</pamela.quadros@titan360.com></don.allman@titan360.com></scott.goldsmith@titan360.com></sharron.shinbo@kingcounty.gov>
5	Dear Mr. Goldsmith,
6 7 8	Based on our current advertising policy, the American Freedom Defense Initiative ad, "FACES OF GLOBAL TERRORISM", cannot be accepted. The advertisement does not comply with Subsections 6.2.4, 6.2.8 and 6.2.9, set forth below.
9 10	6.2.4 <u>False or Misleading</u> . Any material that is or that the sponsor reasonably should have known is false, fraudulent, misleading, deceptive or would constitute a tort of defamation or invasion of privacy.
11	6.2.8 <u>Demeaning or Disparaging</u> . Advertising that contains material that
12	demeans or disparages an individual, group of individuals or entity. For purposes of determining whether an advertisement contains such material, the County will
13	determine whether a reasonably prudent person, knowledgeable of the County's ridership and using prevailing community standards, would believe that the
14	advertisement contains material that ridicules or mocks, is abusive or hostile to, or debases the dignity or stature of any individual, group of individuals or entity.
15	6.2.9 <u>Harmful or Disruptive to Transit System</u> . Advertising that contains
16 17	material that is so objectionable as to be reasonably foreseeable that it will result in harm to, disruption of or interference with the transportation system. For purposes of determining whether an advertisement contains such material, the
18	County will determine whether a reasonably prudent person, knowledgeable of the County's ridership and using prevailing community standards, would believe
19	that the material is so objectionable that it is reasonably foreseeable that it will result in harm to, disruption of or interference with the transportation system.
20	For your reference, I have attached a copy of Metro's Transit Advertising Policy.
21	35. This email represents the final decision by Defendant to reject the AFDI
22	Advertisement and thereby restrict Plaintiffs' speech. ("Free Speech Restriction").
23	36. Attached to the email was a document titled "Transit Advertising Policy," which
24	is an official policy promulgated by Defendant. This policy served as the basis for Defendant's
25	COMPLAINT; Case No 8 STEPHEN PIDGEON
	COMPLAINT; Case No 8 STEPHEN PIDGEON Attorney at Law, P.S. 3002 Colby Avenue, Suite 306 Everett, Washington 98201 (425) 605-4774

Free Speech Restriction. A true and correct copy of the Transit Advertising Policy is attached
 to this Complaint as Exhibit 5 and incorporated herein by reference.

3 37. Defendant's rejection of the AFDI Advertisement caused irreparable harm to
4 Plaintiffs.

38. Pursuant to clearly established First Amendment jurisprudence, the loss of First
Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable
injury sufficient to warrant injunctive relief.

FIRST CLAIM FOR RELIEF

(Freedom of Speech—First Amendment)

39. Plaintiffs hereby incorporate by reference all stated paragraphs.

40. By reason of the aforementioned Free Speech Restriction, which includes Defendant's Transit Advertising Policy, created, adopted, and enforced under color of state law, Defendant has deprived Plaintiffs of their right to engage in protected speech in a public forum in violation of the Free Speech Clause of the First Amendment as applied to the states and their political subdivisions under the Fourteenth Amendment to the United States Constitution and 42 U.S.C. § 1983.

41. Defendant's Free Speech Restriction, facially and as applied to Plaintiffs' speech, is content- and viewpoint-based in violation of the Free Speech Clause of the First Amendment.

42. Defendant's Free Speech Restriction operates as a prior restraint on Plaintiffs'
speech; therefore, it comes to this Court bearing a heavy presumption against its constitutional
validity.

43. Defendant's Free Speech Restriction, facially and as applied to Plaintiffs'
speech, is unreasonable and an effort to suppress expression merely because public officials

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COMPLAINT; Case No. _____

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oppose the speaker's view, including the view expressed by Plaintiffs in the AFDI
 Advertisement.

44. Defendant's Free Speech Restriction, facially and as applied to Plaintiffs' Speech, offends the First Amendment by granting a public official unbridled discretion such that the official's decision to limit speech is not constrained by objective criteria, but may rest on ambiguous and subjective reasons.

45. Defendant's Free Speech Restriction, facially and as applied to Plaintiffs' speech, provides no objective guide for distinguishing between permissible and impermissible advertisements in a non-arbitrary, viewpoint-neutral fashion as required by the First Amendment.

46. As a direct and proximate result of Defendant's violation of the Free Speech Clause of the First Amendment, Plaintiffs have suffered irreparable harm, including the loss of their constitutional rights, entitling them to declaratory and injunctive relief and nominal damages.

SECOND CLAIM FOR RELIEF

(Equal Protection—Fourteenth Amendment)

47. Plaintiffs hereby incorporate by reference all stated paragraphs.

48. By reason of the aforementioned Free Speech Restriction, which includes Defendant's Transit Advertising Policy, created, adopted, and enforced under color of state law, Defendant has unconstitutionally deprived Plaintiffs of the equal protection of the law guaranteed under the Fourteenth Amendment to the United States Constitution and 42 U.S.C. § 1983, in that Defendant is preventing Plaintiffs from expressing a message in a public forum based on the content and viewpoint of the message, thereby denying the use of this forum to those whose views Defendant finds unacceptable.

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COMPLAINT; Case No.

STEPHEN PIDGEON Attorney at Law, P.S. 3002 Colby Avenue, Suite 306 Everett, Washington 98201 (425) 605-4774

ase No

49. As a direct and proximate result of Defendant's violation of the Equal Protection
Clause of the Fourteenth Amendment, Plaintiffs have suffered irreparable harm, including the
loss of their constitutional rights, entitling them to declaratory and injunctive relief and nominal
damages.

THIRD CLAIM FOR RELIEF

(Due Process—Fourteenth Amendment)

50. Plaintiffs hereby incorporate by reference all stated paragraphs.

51. By reason of the aforementioned Free Speech Restriction, which includes Defendant's Transit Advertising Policy, created, adopted, and enforced under color of state law, Defendant has unconstitutionally deprived Plaintiffs of the due process of law guaranteed under the Fourteenth Amendment to the United States Constitution and 42 U.S.C. § 1983.

52. It is a basic principle of due process that a regulation is void for vagueness if its prohibitions are not clearly defined.

53. Defendant's Free Speech Restriction, facially and as applied to Plaintiffs' Speech, offends the Fourteenth Amendment's guarantee of due process by granting a public official unbridled discretion such that the official's decision to limit speech is not constrained by objective criteria, but may rest on ambiguous and subjective reasons.

54. Defendant's Free Speech Restriction, facially and as applied to Plaintiffs' Speech, is unconstitutionally vague in violation of the Fourteenth Amendment.

55. As a direct and proximate result of Defendant's violation of the Due Process Clause of the Fourteenth Amendment, Plaintiffs have suffered irreparable harm, including the loss of their constitutional rights, entitling them to declaratory and injunctive relief and nominal damages.

PRAYER FOR RELIEF

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WHEREFORE, Plaintiffs ask this Court:

COMPLAINT; Case No.

STEPHEN PIDGEON Attorney at Law, P.S. 3002 Colby Avenue, Suite 306 Everett, Washington 98201 (425) 605-4774

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1	A)	to declare that Defer	ndant violated the First and Four	rteenth Amendments to the
2	United States	s Constitution as set for	th in this Complaint;	
3	B)	to preliminarily and	permanently enjoin Defendant'	s Free Speech Restriction,
4	which includ	es Defendant's Transit	Advertising Policy, as set forth i	n this Complaint;
5	C)	to award Plaintiffs	nominal damages for the past	loss of their constitutional
6	rights as set f	forth in this Complaint;	;	
7	D)	to award Plaintiffs th	heir reasonable attorney fees, co	osts, and expenses pursuant
8	to 42 U.S.C.	§ 1988 and other applic	cable law; and	
9	E)	to grant such other a	nd further relief as this Court sho	uld find just and proper.
10			Respectfully submitted,	
11			Stephen Pidgeon Attorney at L	aw, P.S.
12			/s/ Stephen Pidgeon	
13			Stephen Pidgeon, Esq. WSBA Attorney at Law, P.S.	# 25265
14			3002 Colby Avenue, Suite 306	
			Everett, Washington 98201 attorney@stephenpidgeon.com	
15			Tel: (425) 605-4774; Fax: (425	
16			AMERICAN FREEDOM LAV	V CENTER
17				
18			/s/ Robert J. Muise	29.40)
10			Robert J. Muise, Esq.* (MI P62 P.O. Box 131098	2849)
19			Ann Arbor, Michigan 48113	
20			rmuise@americanfreedomlawc	enter.org
20			Tel: (734) 635-3756; Fax: (801) 760-3901
21			/s/ David Yerushalmi	
22			David Yerushalmi, Esq.* (DC	
23			1901 Pennsylvania Avenue NV Washington, D.C. 20001	v, Suite 201
			david.yerushalmi@verizon.net	
24			Tel: (646) 262-0500;Fax: (801)	760-3901
25			*Application for <i>pro hac vice</i> a	dmission pending.
	COMPLAIN	T; Case No	12	STEPHEN PIDGEON Attorney at Law, P.S. 3002 Colby Avenue, Suite 306

EXHIBIT 1

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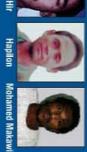


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Zulkitli bin Hir



Stop a Terrorist. Save Lives. Up to \$25 Million Reward.

Остановите террориста. Спасите жизнь. Jooji argagaxiso. Nafyow badbaadi.

www.rewardsforjustice.net • rfj@state.gov • 1-800-US REWARD DIPLOMATIC SECURITY | REWARDS FOR JUSTICE

Patigilin ang isang terorista. Magsalba ng mga buhay. .قم بايقاف إرهابي. انقذ أرواح

EXHIBIT 2



Home • Most Wanted • Most Wanted Terrorists

Most Wanted Terrorists





The alleged terrorists on this list have been indicted by sitting Federal Grand Juries in various jurisdictions in the United States for the crimes reflected on their wanted posters. Evidence was gathered and presented to the Grand Juries, which led to their being charged. The indictments currently listed on the posters allow them to be arrested and brought to justice. Future indictments may be handed down as various investigations proceed in connection to other terrorist incidents, for example, the terrorist attacks on September 11, 2001.

The Rewards for Justice program, administered by the United States Department of State's Bureau of Diplomatic Security, offers rewards for information leading to the arrest of many of these terrorists.

with 100% accuracy, that they are deceased.

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EXHIBIT 3



Damage by Means of Fire or an Explosive; Damage by Means of Fire or an Explosive to United States Property; Transport in Interstate Commerce an Explosive; Destruction of Motor Vehicles or Motor Vehicle Facilities; Conspiracy to Commit Offense or Defraud the United States; Aiding and Abetting; Assault of a Federal Officer in the Line of Duty; Commission of a Crime of Violence Through the Use of a Deadly Weapon or Device

ABDUL RAHMAN YASIN





Photograph taken in 2002

Aliases:

Abdul Rahman Said Yasin, Aboud Yasin, Abdul Rahman S. Taha, Abdul Rahman S. Taher

Date(s) of Birth Used: April 10, 1960 Hair: Black **Place of Birth:** Bloomington, Indiana Eyes: Brown Height: 5'10" **Complexion:** Olive Weight: 180 pounds Sex: Male **Build**: Unknown **Citizenship:** American Language: Unknown

Scars and Marks: Remarks: Yasin possibly has a chemical burn scar on his right thigh. Yasin is an epileptic.

CAUTION

Abdul Rahman Yasin is wanted for his alleged participation in the terrorist bombing of the World Trade Center, New York City, on February 26, 1993, which resulted in six deaths, the wounding of numerous individuals, and the significant destruction of property and commerce.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction of Abdul Rahman Yasin.

SHOULD BE CONSIDERED ARMED AND DANGEROUS

If you have any information concerning this person, please contact your local FBI office or the nearest American Embassy or Consulate.

DESCRIPTION



Conspiracy to Murder a United States National While Outside the United States; Conspiracy to Use a Weapon of Mass Destruction Against a National of the United States While Outside the United States

HAKIMULLAH MEHSUD



Aliases:

Hakimullah Mahsud, Zulfiqar Mehsud, Hakeemullah Mehsud, Hakimullah Masoud, "Mehsud"

Date(s) of Birth Used:	January 1, 1980;	Hair:	Black	
	circa 1978 - 1981	Eyes:	Brown	
Place of Birth:	Kotkai Region, South	Complexion:	Olive	
	Waziristan, Pakistan	Sex:	Male	
Height:	6'0"	Citizenship:	Pakistani	
Weight:	200 pounds	Language:	Pashto	
Build:	Medium			
Scars and Marks:	Mehsud has scars from fac	cial acne.		
Remarks:	Mehsud belongs to the Esl	hangai clan of the Mehsud	tribe. Mehsud, believed to be a	
	resident of the Federally Administered Tribal Area (FATA) of Pakistan, is the leader of th			
	Tehrik-e-Taliban Pakistan	(TTP), known as the Pakis	stani Taliban.	

CAUTION

Hakimullah Mehsud is wanted for his alleged involvement in the December 30, 2009 bombing of a United States military base located near the Afghan town of Khost, that lies along the Afghanistan-Pakistan border. The blast from the explosion killed seven United States citizens and injured six other United States citizens. The explosion occurred after a suicide bomber entered the military base and detonated a device that was hidden under his clothing.

On August 20, 2010, Mehsud was charged federally with conspiracy to murder a United States National while outside the United States and conspiracy to use a weapon of mass destruction against a National of the United States while outside the United States. That same day, a federal warrant was issued by the United States District Court, District of Columbia, for Mehsud's arrest.

On September 1, 2010, the United States added Hakimullah Mehsud to its list of Specially Designated Global Terrorists and the TTP to its list of Foreign Terrorist Organizations.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction, in any country, of Hakimullah Mehsud.

SHOULD BE CONSIDERED ARMED AND DANGEROUS

DESCRIPTION



Maliciously Damaging and Destroying, and Attempting to Destroy and Damage, by Means of Explosives, Buildings and Other Property; Possession of a Destructive Device During, in Relation to, and in Furtherance of a Crime of Violence

DANIEL ANDREAS SAN DIEGO





eyeglasses, is skilled at sailing, and has traveled internationally. He is known to possess a

Aliases:

Andreas San Diego, D. Andreas San Diego, "Andreas"

handgun.

Date(s) of Birth Used:	February 9, 1978	Hair:	Brown	
Place of Birth:	Berkeley, California	Eyes:	Brown	
Height:	6'0" (1.80 m)	Complexion:	Light	
Weight:	160 pounds (73 Kg)	Sex:	Male	
		Race:	White	
		Citizenship:	American	
Scars and Marks:	San Diego has the following tattoos: a round image of burning hillsides in the center of his chest with the words "It only takes a spark" printed in a semicircle below; burning and collapsing buildings on the sides of his abdomen and back; and a single leafless tree rising from a road in the center of his lower back. These tattoos may have been significantly altered or covered with new tattoos.			
Remarks:	San Diego has ties to animal rights extremist groups. He is known to follow a vegan diet, eating no meat or food containing animal products. In the past, he has worked as a computer network specialist and with the operating system LINUX. San Diego wears			

CAUTION

Daniel Andreas San Diego is wanted for his alleged involvement in two bombings in the San Francisco, California, area. On August 28, 2003, two bombs exploded approximately one hour apart on the campus of a biotechnology corporation in Emeryville. Then, on September 26, 2003, one bomb strapped with nails exploded at a nutritional products corporation in Pleasanton. San Diego was indicted in the United States District Court, Northern District of California, in July of 2004.

REWARD

The FBI is offering a reward of up to \$250,000 for information leading directly to the arrest of Daniel Andreas San Diego.

SHOULD BE CONSIDERED ARMED AND DANGEROUS

DESCRIPTION



Act of Terrorism - Domestic Terrorism; Unlawful Flight to Avoid Confinement - Murder

JOANNE DEBORAH CHESIMARD



Aliases: Assata Shakur, Joanne Byron, Barbara Odoms, Joanne Chesterman, Joan Davis, Justine Henderson, Mary Davis, Pat Chesimard, Jo-Ann Chesimard, Joanne Debra Chesimard, Joanne D. Byron, Joanne D. Chesimard, Joanne Davis, Chesimard Joanne, Ches Chesimard, Sister-Love Chesimard, Joann Debra Byron Chesimard, Joanne Deborah Byron Chesimard, Joan Chesimard, Josephine Henderson, Carolyn Johnson, Carol Brown, "Ches"

DESCRIPTION

Date(s) of Birth Used:	July 16, 1947;	Hair:	Black/Gray
	August 19, 1952	Eyes:	Brown
Place of Birth:	New York City, New York	Sex:	Female
Height:	5'7"	Race:	Black
Weight:	135 to 150 pounds	Citizenship :	American

Scars and Marks: Chesimard has scars on her chest, abdomen, left shoulder, and left knee. Remarks: She may wear her hair in a variety of styles and dress in African tribal clothing.

CAUTION

Joanne Chesimard is wanted for escaping from prison in Clinton, New Jersey, while serving a life sentence for murder. On May 2, 1973, Chesimard, who was part of a revolutionary extremist organization known as the Black Liberation Army, and two accomplices were stopped for a motor vehicle violation on the New Jersey Turnpike by two troopers with the New Jersey State Police. At the time, Chesimard was wanted for her involvement in several felonies, including bank robbery. Chesimard and her accomplices opened fire on the troopers. One trooper was wounded and the other was shot and killed execution-style at point-blank range. Chesimard fled the scene, but was subsequently apprehended. One of her accomplices was killed in the shoot-out and the other was also apprehended and remains in jail.

In 1977, Chesimard was found guilty of first degree murder, assault and battery of a police officer, assault with a dangerous weapon, assault with intent to kill, illegal possession of a weapon, and armed robbery. She was sentenced to life in prison. On November 2, 1979, Chesimard escaped from prison and lived underground before being located in Cuba in 1984. She is thought to currently still be living in Cuba.

REWARD

The FBI is offering a reward of up to \$1,000,000 for information directly leading to the apprehension of Joanne Chesimard.

SHOULD BE CONSIDERED ARMED AND DANGEROUS

If you have any information concerning this person, please call the FBI Toll-Free tip line at 1-800-CALL-FBI (1-800-225-5324). You may also contact your local FBI office, or the nearest American Embassy or Consulate.



Treason - 18 U.S.C. § 2381; Providing Material Support to Al Qaeda - 18 U.S.C. § 2339B; Aiding and Abetting - 18 U.S.C. § 2

ADAM YAHIYE GADAHN



Aliases:

Abu Suhayb Al-Amriki, Abu Suhail Al-Amriki, Abu Suhayb, Yihya Majadin Adams, Adam Pearlman, Yayah, Azzam the American, Azzam Al-Amriki

DESCRIPTION

Date(s) of Birth Used:	September 1, 1978	Hair:	Brown
Place of Birth:	United States	Eyes:	Hazel
Height:	5'11"	Complexion:	Light
Weight:	210 pounds	Sex:	Male
Build:	Medium	Citizenship:	American
		Languages:	Arabic;
			English

Scars and Marks: **Remarks:**

Gadahn has scars on his chest and right forearm. None

CAUTION

Adam Yahiye Gadahn was indicted in the Central District of California for treason and material support to Al Qaeda. The charges are related to Gadahn's alleged involvement in a number of terrorist activities, including providing aid and comfort to Al Qaeda and services for Al Qaeda.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$1 million for information leading to the arrest of Adam Yahiye Gadahn.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Count One - Passport Fraud; 18 USC 1543 FAOUZI MOHAMAD AYOUB



Aliases:

Fawzi Mohammed Mustafa Ayoub, Faouzi Mohamed Ayoub, Fawzi Mohamad Ayoub, Hussein Ahmed Mustafa Ayoub, Abu Fawaz, Abu Fuaz, Abu Ahmed, Hajj Faouzi, Ziyad Khoury, Frank Mariano Boschi, Frank Marion Bushi, Housein Iyoub, Huseein Ayyub, Frank Boschi

- Date(s) of Birth Used: Place of Birth: Height: Weight: Build:
- October 5, 1966 Beirut, Lebanon 5'7" 169 pounds Medium
- DESCRIPTION
 - Hair: Eyes: Complexion: Sex: Citizenship: Languages:
- Black Brown Light Male Lebanese English; Arabic

CAUTION

Faouzi Mohamad Ayoub was indicted by the United States Attorney's Office, Eastern District of Michigan, on August 5, 2009. Ayoub willfully and knowingly used and attempted to use a false, forged, or counterfeit United States Passport in order to gain admittance into the state of Israel for the purpose of conducting a bombing on behalf of the designated Foreign Terrorist Organization Hizballah.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Conspiracy to Provide Material Support to Terrorists; Conspiracy to Provide Material Support to a Foreign Terrorist Organization; Providing Material Support to a Foreign Terrorist Organization

JEHAD SERWAN MOSTAFA



Aliases: Emir Anwar, Ahmed Gurey, Anwar al-Amriki, "Ahmed" (moniker), "Anwar" (moniker), Abu Abdullah al-Muhajir

DESCRIPTION

	Hair:	Brown
Date(s) of Birth Used:	December 28, 1981; Eyes:	Blue
	November 11, 1986 Complexion:	Light
Place of Birth:	Waukesha, Wisconsin Sex:	Male
Height:	6'1" Citizenship:	American
Weight:	170 pounds Languages:	Arabic;
Build:	Tall, thin	Somali;
		English

Scars and Marks: Mostafa is left-handed. He wears a full beard and glasses.
 Remarks: Mostafa speaks English, Arabic, and Somali. He may have or is likely to visit the following areas: Somalia, Yemen, Ethiopia, Kenya, and other African countries. Additionally, Mostafa graduated from a university in California with a bachelor's degree in economics.

CAUTION

Jehad Mostafa is being sought for his alleged terrorist activities and acting as an operating member of al-Shabaab, a Somalia-based terrorist organization.

On October 9, 2009, a federal arrest warrant based upon a federal grand jury indictment was issued for Jehad Serwan Mostafa by the United States District Court, Southern District of California, San Diego California. The indictment charges Mostafa with providing material support to the foreign terrorist organization al-Shabaab. The indictment charges Mostafa specifically with the following crimes: conspiracy to provide material support to terrorists; conspiracy to provide material support to a foreign terrorist organization; and providing material support to a foreign terrorist organization.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction, in any country, of Jehad Serwan Mostafa.

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Providing Material Support to a Terrorist Organization; Conspiring to Provide Material Support to a Terrorist Organization

JABER A. ELBANEH





Photograph taken in approximately 2000



Photograph taken in 1996

Aliases:

Jaber A. Elbanelt, Jaben A. Elbanelt, Jabor Elbaneh, Abu Jubaer, Jubaer Elbaneh, "Jubair"

DESCRIPTION

Date(s) of Birth Used: Place of Birth: Height: Weight: Build:

September 9, 1966 Yemen 5'8" 200 pounds Stocky Hair: Eyes: Complexion: Sex: Citizenship: Languages:

Brown Brown Unknown Male Yemeni Arabic; English

Scars and Marks: Remarks: None known

Elbaneh has ties to Yemen and speaks in a Yemeni accent. He has worked as a salesman and a taxi driver.

CAUTION

Jaber A. Elbaneh is wanted in connection with a federal criminal complaint unsealed on May 21, 2003, in the Western District of New York, Buffalo, New York. He is charged with providing material support to a terrorist organization and conspiring to provide material support, specifically to Al-Qaeda. Elbaneh is believed to have fled the United States and is still thought to be outside the country.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading to the arrest of Jaber A. Elbaneh.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Murder and Conspiracy to Murder United States Nationals and United States Military Personnel; Conspiracy to Use and Using Weapon of Mass Destruction; Damaging and Destroying Government Properties and Defense Facilities; Providing Material Support to Terrorist Organization

JAMEL AHMED MOHAMMED ALI AL-BADAWI



Aliases:

Jamal Muhsin Al-Tali, Abu Abdul Rahman Al-Badawi, Abu Abdul Rahman Al-Adani, Jamal Mohammad Ahmad Ali Al-Badawi, Jamal Mohammad Ahmad

DESCRIPTION

Date(s) of Birth Used:	July 22, 1960; October 23, 1960; 1963	Hair: Eyes: Complexion:	Black Black Olive
Place of Birth: Height: Weight: Build:	Al-Shargian, Makiris, Yemen Approximately 5'5" Approximately 175 pounds Medium	Sex: Citizenship: Language:	Male Yemeni Arabic
Scars and Marks: Remarks:	None known Al-Badawi may have facial ha	air.	

CAUTION

Jamel Ahmed Mohammed Ali Al-Badawi is wanted in connection with the October 12, 2000, bombing of the USS Cole in Aden, Yemen. This attack resulted in the deaths of 17 American sailors. Al-Badawi was being held by Yemeni authorities in connection with the attack when he escaped from prison in April of 2003. Al-Badawi was recaptured in March of 2004, but again escaped Yemeni custody on February 3, 2006.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading to the arrest of Jamel Ahmed Mohammed Ali Al-Badawi.

SHOULD BE CONSIDERED ARMED AND EXTREMELY DANGEROUS



Damaging an Aircraft; Unlawful Placing of a Destructive Device on an Aircraft; Performing an Act of Violence Against an Individual on an Aircraft; Hostage Taking; Murder of United States Nationals Outside of the United States; Attempted Murder of United States Nationals Outside of the United States; Causing Serious Bodily Injury to United States Nationals Outside the United States; Assault on a Passenger; Malicious Damage to an Aircraft; Use of a Firearm During a Crime of Violence; Aircraft Piracy; Aiding and Abetting; Conspiracy to Commit Offenses Outside the United States

JAMAL SAEED ABDUL RAHIM



Photograph taken in 2000

Aliases:

Ali Al Jassem Fahd, Jamal Saeed Abdulrahman, Fahad Ali al Jasseen, Ismael, Fahad

None known

DESCRIPTION

Hair:

Eves:

Date(s) of Birth Used: Place of Birth: Height: Weight: Build: September 5, 1965 Lebanon 5'9" (175 centimeters) 154 pounds (70 kilograms) Medium

Complexion: Sex: Citizenship: Languages: Brown Dark Olive Male Palestinian and possibly Lebanese Arabic; English

Scars and Marks: Remarks:

Rahim is most likely residing in a Middle Eastern country. He is believed to be a member of the Abu Nidal Organization.

CAUTION

Jamal Saeed Abdul Rahim was indicted in the District of Columbia for his alleged role in the September 5, 1986, hijacking of Pan American World Airways Flight 73 during a stop in Karachi, Pakistan. The attack resulted in the murder of 20 passengers and crew, including two American citizens, and the attempted murder of 379 passengers and crew, including 89 American citizens.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction, in any country, of Jamal Saeed Abdul Rahim.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Providing Material Support to Terrorists; Conspiring to Provide Material Support to a Designated Foreign Terrorist Organization, al-Shabaab; Providing Material Support to al-Shabaab

OMAR SHAFIK HAMMAMI



Aliases: Abu Mansour al-Amriki, Farouk, Farouq

DESCRIPTION

Date(s) of Birth Used:May 6, 1984Place of Birth:AlabamaHeight:5'11"Weight:160 poundsBuild:Medium

Hair: Brown Eyes: Brown Complexion: Light Sex: Male Race: White Citizenship: United States Languages: Arabic; English; Somali

Remarks: Hammami is a United States citizen and former resident of Alabama. He is believed to be in Somalia. Hammami speaks Arabic and English fluently, and some Somali.

CAUTION

Omar Shafik Hammami was indicted originally in the Southern District of Alabama in 2007 on terrorism violations. A superseding indictment was returned against Hammami in 2009 on terrorism violations for leaving the United States to join the Somalia-based terrorist organization, al-Shabaab. He is alleged to have provided material support to terrorists as early as 2006.

On December 13, 2007, a federal warrant was issued by the United States District Court, Southern District of Alabama, for Hammami's arrest.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction, in any country, of Omar Shafik Hammami.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Conspiracy to Kill U.S. Nationals; Conspiracy to Murder U.S. Employees; Conspiracy to Use Weapons of Mass Destruction Against U.S. Nationals; Conspiracy to Destroy Property of the U.S.; Conspiracy to Attack National Defense Utilities; Bombing Resulting in Death; Use of Weapons of Mass Destruction Against U.S. Nationals; Murder While Using Destructive Device During a Crime of Violence; Murder of Federal Employees; Attempted Murder of Federal Employees

ALI SAED BIN ALI EL-HOORIE



Alias: Ali Saed Bin Ali Al-Houri

DESCRIPTION

Date(s) of Birth Used:	July 10, 1965;	Hair:	Black
	July 11, 1965	Eves:	Black
Place of Birth:	El Dibabiya, Saudi Arabia	Complexion:	Olive
Height:	5'2"	Sex:	Male
Weight:	130 pounds	Citizenship:	Saudi Arabian
Build:	Unknown	Language:	Arabic

Scars and Marks: Remarks: El-Hoorie has a mole on his face. El-Hoorie is an alleged member of the terrorist organization, Saudi Hizballah.

CAUTION

Ali Saed Bin Ali El-Hoorie has been indicted in the Eastern District of Virginia for the June 25, 1996, bombing of the Khobar Towers military housing complex in Dhahran, Kingdom of Saudi Arabia.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction of Ali Saed Bin Ali El-Hoorie.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Conspiracy to Commit Hostage Taking Resulting in Death; Hostage Taking; Murder of a United States National Outside the United States; Hostage Taking Resulting in Death; Conspiracy to Use and Carry a Firearm During a Crime of Violence; Using and Carrying a Firearm During a Crime of Violence; Aiding and Abetting and Causing an Act to be Done

ISNILON TOTONI HAPILON





Photograph taken in 2000

Aliases:

Abu Musab, Sol, Abu Tuan, Esnilon, Salahuddin, The Deputy, Deputy Amir

Bro Bro
Bro
Ligl
Mal
Phil
Tau
Tag
Eng

Brown Brown Light-skinned Male Philippine Tausug; Tagalog; English; Yakan

Scars and Marks:Hapilon has facial birthmarks.Remarks:Hapilon graduated from the University of the Philippines School of Engineering. Hapilon
may travel to Saudi Arabia and Malaysia.

CAUTION

DESCRIPTION

Isnilon Totoni Hapilon was indicted in the District of Columbia, for his alleged involvement in terrorist acts against United States nationals and other foreign nationals in and around the Republic of the Philippines. Hapilon allegedly served as deputy or second in command for the foreign terrorist organization, Abu Sayyaf Group (ASG). This organization of armed individuals allegedly took the foreign nationals hostage and committed violent acts against them to include murder.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction of Isnilon Totoni Hapilon.

SHOULD BE CONSIDERED ARMED AND DANGEROUS

If you have any information concerning this person, please contact your local FBI office or the nearest American Embassy or Consulate.

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Conspiracy to Use Weapons of Mass Destruction; Providing Material Support to a Foreign Terrorist Organization; Conspiracy to Provide Material Support to a Foreign Terrorist **Organization; Receiving Military-Type Training From a Foreign Terrorist Organization;** Conspiracy to Commit an Act of Terrorism Transcending National Boundaries; Attempt to Commit an Act of Terrorism Transcending National Boundaries; Use of Destructive Device

DNAN G. EL SHUKI



Aliases:

Adnan G. El Shukri Jumah, Abu Arif, Ja'far Al-Tayar, Jaffar Al-Tayyar, Jafar Tayar, Jaafar Al-Tayyar, "Hamad"

Date(s) of Birth Used: August 4, 1975 Hair: Black **Place of Birth:** Saudi Arabia **Eves:** Black Height: 5'3" to 5'6" **Complexion:** Dark, Mediterranean Weight: Male 132 pounds Sex: **Build:** Average **Citizenship:** Guyanese Languages: Arabic; English

Scars and Marks: **Remarks:**

None known

El Shukrijumah occasionally wears a beard. He has a pronounced nose and is asthmatic. El Shukrijumah speaks English and carries a Guyanese passport, but may attempt to enter the United States with a Saudi, Canadian, or Trinidadian passport.

CAUTION

Adnan G. El Shukrijumah was indicted in the Eastern District of New York in July of 2010 for his alleged role in a terrorist plot to attack targets in the United States and the United Kingdom. The charges reveal that the plot against New York City's subway system, uncovered in September of 2009, was directed by senior Al-Qaeda leadership in Pakistan, and was also directly related to a scheme by Al-Qaeda plotters in Pakistan to use Western operatives to attack a target in the United States. El Shukrijumah is thought to have served as one of the leaders of Al-Qaeda's external operations program.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the capture of Adnan G. El Shukrijumah.

SHOULD BE CONSIDERED ARMED AND DANGEROUS

If you have any information concerning this person, please contact your local FBI office or the nearest American Embassy or Consulate.

DESCRIPTION



Racketeering Influenced and Corrupt Organization (RICO); Interstate Transportation in Aid of Racketeering; Conspiracy to Murder Persons in a Foreign Country

ABD AL AZIZ AWDA



Aliases:

Sheik Odeh, Abdel Aziz Odeh, Abd Al Aziz Odeh, Abed Al Aziz Odeh, Abu Ahmed, Sheik Awda, Fadl Abu Ahmed, Al Sheik, The Sheik, Mawlana

DESCRIPTION

Date(s) of Birth Used: Place of Birth: Height: Weight: Build:	December 20, 1950 Jabaliyah, Gaza Strip Unknown Unknown Unknown	Hair: Eyes: Complexion: Sex: Citizenship: Languages:	Black Brown Light Male Palestinian Arabic; English
Scars and Marks: Remarks:	None known Awda was educated in Arab and Islamic Studies in Cairo, Egypt. He has worked as a lecturer at a university and as an Imam at a Mosque, both of which were located in the Gaza Strip. He normally wears a moustache and a beard.		

CAUTION

Abd Al Aziz Awda is wanted for conspiracy to conduct the affairs of the designated international terrorist organization known as the "Palestinian Islamic Jihad" (PIJ) through a pattern of racketeering activities such as bombings, murders, extortions, and money laundering. Awda was one of the original founders and the spiritual leader of the PIJ and is presently still involved in the organization, which has its headquarters located in Damascus, Syria. He was listed as a "Specially Designated Terrorist" under United States law on January 23, 1995. Awda was indicted in a 53 count indictment in the United States District Court, Middle District of Florida, Tampa, Florida.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Conspiracy to Kill U.S. Nationals; Conspiracy to Murder U.S. Employees; Conspiracy to Use Weapons of Mass Destruction Against U.S. Nationals; Conspiracy to Destroy Property of the U.S.; Conspiracy to Attack National Defense Utilities; Bombing Resulting in Death; Use of Weapons of Mass Destruction Against U.S. Nationals; Murder While Using Destructive Device During a Crime of Violence; Murder of Federal Employees; Attempted Murder of Federal Employees

IBRAHIM SALIH MOHAMMED AL-YACOUB





DESCRIPTION

Date(s) of Birth Used: Place of Birth: Height: Weight: Build: October 16, 1966 Tarut, Saudi Arabia 5'4" 150 pounds Unknown

Hair: Eyes: Complexion: Sex: Citizenship: Language:

Black Brown Olive Male Saudi Arabian Arabic

Scars and Marks: Remarks: None known Al-Yacoub is an alleged member of the terrorist organization, Saudi Hizballah.

CAUTION

Ibrahim Salih Mohammed Al-Yacoub has been indicted in the Eastern District of Virginia for the June 25, 1996, bombing of the Khobar Towers military housing complex in Dhahran, Kingdom of Saudi Arabia.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction of Ibrahim Salih Mohammed Al-Yacoub.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Conspiracy to Commit Aircraft Piracy, to Commit Hostage Taking, to Commit Air Piracy Resulting in Murder, to Interfere With a Flight Crew, to Place a Destructive Device Aboard an Aircraft, to Have Explosive Devices About the Person on an Aircraft, and to Assault Passengers and Crew; Air Piracy Resulting in Murder; Air Piracy; Hostage Taking; Interference With Flight Crew; and Placing Explosives Aboard Aircraft; Placing Destructive Devices Aboard Aircraft; Assault Aboard Aircraft With Intent to Hijack With a Dangerous Weapon and Resulting in Serious Bodily Injury; Aiding and Abetting





Aliases:

Remarks:

Ammar Mansour Bouslim, Hassan Rostom Salim

Approximately 1960

Date(s) of Birth Used: Place of Birth: Height: Weight: Build: Scars and Marks: DESCRIPTION

Hair:

Lebanon	Eyes:	Brown
5'8"	Sex:	Male
150 pounds	Citizenship:	Lebanese
Medium	Language:	Arabic
None Known Atwa is an alleged memb to be in Lebanon.	per of the terrorist organizat	tion, Lebanese Hizballah. He is thought

Black

CAUTION

Ali Atwa was indicted for his role and participation in the June 14, 1985, hijacking of a commercial airliner which resulted in the assault on various passengers and crew members, and the murder of one United States citizen.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction of Ali Atwa.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Conspiracy to Commit Assault and Damage Property; Conspiracy to Commit Murder; Murder; Aircraft Sabotage; Damaging Aircraft Used in Foreign Commerce; Placing Bombs on Aircraft; Assault; Attempted Aircraft Sabotage; Aiding and Abetting

HUSAYN MUHAMMAD AL-UMARI





Age progressed drawing prepared in 2009

Aliases:

Abu Ibrahim, Hussein Mohammed Al-Umari, "The Bomb Man"

DESCRIPTION

Date(s) of Birth Used:	1936	Hair:	Black/Gray (balding)
Place of Birth:	Jaffa, Palestine	Eyes:	Brown
Height:	5'7" to 5'8"	Complexion:	Light
Weight:	Unknown	Sex:	Male
Build:	Medium to Large	Citizenship:	Unknown
	-	Language:	Palestinian Arabic (Lebanese
			accent), English

Scars and Marks:Al-Umari has a scar on the fingers of his right hand to his forearm, and a scar on his left
hand in the web between the thumb and index finger (2 to 3 inches).Remarks:Al-Umari has thin lips, a cleft chin, and a wide mouth. He wears a mustache, glasses, and
dresses very well. Al-Umari is a Sunni Muslim and doesn't drink or gamble, but smokes
Cuban cigars. He has a high school education and is a mechanic and explosives expert. Al-
Umari formed 15 May Organization in 1979, whose mission was to promote the Palestinian
cause through violence towards supporters of Israel. Al-Umari has a Lebanese passport.

CAUTION

Husayn Muhammad Al-Umari was indicted in the District of Columbia for his alleged role in the August 11, 1982, bombing of Pan Am Flight 830, while it was en route from Japan to Hawaii. He is alleged to have prepared the bomb that was placed under a seat on Flight 830, resulting in the death of a 16-year-old passenger and injuring 16 other passengers.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction, in any country, of Husayn Muhammad Al-Umari. The United States Department of Defense is offering a reward of up to \$200,000 for information leading to the capture of Al-Umari.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Damaging an Aircraft; Unlawful Placing of a Destructive Device on an Aircraft; Performing an Act of Violence Against an Individual on an Aircraft; Hostage Taking; Murder of United States Nationals Outside of the United States; Attempted Murder of United States Nationals Outside of the United States; Causing Serious Bodily Injury to United States Nationals Outside the United States; Assault on a Passenger; Malicious Damage to an Aircraft; Use of a Firearm During a Crime of Violence; Aircraft Piracy; Aiding and Abetting; Conspiracy to Commit Offenses Outside the United States

MUHAMMAD AHMED AL-MUNAWAR



Photograph taken in 2000

Aliases:

Abdarhman Al Rashid Mansour, Ashraf Naeem Mansoor, Zubair, Shamed Khalil Zubair, Abdul Rahman Al-Rahid Mansoor, Al Rashad Mansur, Ahmed Khalid Zubair, Abdur Rehman Rashad Mansur

DESCRIPTION

Date(s) of Birth Used:	May 21, 1965	Hair:	Black
Place of Birth:	Kuwait	Eyes:	Dark
Height:	5'9" (177 centimeters)	Complexion:	Light
Weight:	132 pounds (60 kilograms)	Sex:	Male
Build:	Medium	Citizenship:	Palestinian and possibly
		-	Lebanese
		Language:	Arabic
Scars and Marks:	Al-Munawar has a scar on his left hand near his thumb.		
Remarks:	Al-Munawar is most likely residing in a Middle Eastern country. He is believed to be a		

member of the Abu Nidal Organization.

CAUTION

Muhammad Ahmed Al-Munawar was indicted in the District of Columbia for his alleged role in the September 5, 1986, hijacking of Pan American World Airways Flight 73 during a stop in Karachi, Pakistan. The attack resulted in the murder of 20 passengers and crew, including two American citizens, and the attempted murder of 379 passengers and crew, including 89 American citizens.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction, in any country, of Muhammad Ahmed Al-Munawar.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Murder of U.S. Nationals Outside the United States; Conspiracy to Murder U.S. Nationals Outside the United States; Attack on a Federal Facility Resulting in Death

AYMAN AL-ZAWAHIRI



Aliases:

Abu Muhammad, Abu Fatima, Muhammad Ibrahim, Abu Abdallah, Abu al-Mu'iz, The Doctor, The Teacher, Nur, Ustaz, Abu Mohammed, Abu Mohammed Nur al-Deen, Abdel Muaz, Dr. Ayman al Zawahiri

Date(s) of Birth Used: Place of Birth: Height: Weight: Build: June 19, 1951 Egypt Unkown Unknown Unknown

DESCRIPTION

Hair: Eyes: Complexion: Sex: Citizenship: Languages: Brown/Black Dark Olive Male Egyptian Arabic; French

Scars and Marks: Remarks: None known Al-Zawahiri is a physician and the founder of the Egyptian Islamic Jihad (EIJ). This organization opposes the secular Egyptian Government and seeks its overthrow through violent means. In approximately 1998, the EIJ led by Al-Zawahiri merged with Al Qaeda.

CAUTION

Ayman Al-Zawahiri has been indicted for his alleged role in the August 7, 1998, bombings of the United States Embassies in Dar es Salaam, Tanzania, and Nairobi, Kenya.

REWARD

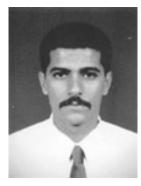
The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$25 million for information leading directly to the apprehension or conviction of Ayman Al-Zawahiri.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Murder of U.S. Nationals Outside the United States; Conspiracy to Murder U.S. Nationals Outside the United States; Attack on a Federal Facility Resulting in Death; Conspiracy to Kill U.S. Nationals, to Murder, to Destroy Buildings and Property of the United States, and to Destroy the National Defense Utilities of the United States

ABDULLAH AHMED ABDULLAH



Aliases:

Abu Mohamed Al-Masri, Saleh, Abu Mariam, Abdullah Ahmed Abdullah Ali, Abu Mohammed

DESCRIPTION

Date(s) of Birth Used: Place of Birth:	Approximately 1963 Egypt	Hair: Eves:	Dark Dark
Height:	Approximately 5'8"	Complexion:	Olive
Weight:	Unknown	Sex:	Male
Build:	Medium	Citizenship:	Egyptian
		Language:	Arabic
Scars and Marks: Remarks:	Abdullah has a scar on the ri Abdullah fled Nairobi, Keny wear a moustache.		nt to Karachi, Pakistan. He may

CAUTION

Abdullah Ahmed Abdullah has been indicted for his alleged involvement in the August 7, 1998, bombings of the United States Embassies in Dar es Salaam, Tanzania, and Nairobi, Kenya.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction of Abdullah Ahmed Abdullah.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Racketeering Influenced and Corrupt Organization (RICO); Interstate Transportation in Aid of Racketeering; Conspiracy to Murder Persons in a Foreign Country

RAMADAN ABDULLAH MOHAMMAD SHALLAH



DESCRIPTION

Aliases:

Ramadan Shallah, Rashad, Mohamad El-Fatih, Mahmoud, Radwan, Al-Shaer, Abu Abdullah, Ramadan Abdullah

	DE		
Date(s) of Birth Used:	January 1, 1958	Hair:	Black
Place of Birth:	Sajaya, Gaza Strip	Eyes:	Brown
Height:	6'1"	Complexion:	Light
Weight:	225 pounds	Sex:	Male
Build:	Medium	Citizenship:	Palestinian
		Languages:	Arabic;
		_ 0	English

Scars and Marks: Remarks:

None known

Shallah earned a PhD in Banking and Economics from a university in England. In the past, he has worked as a university professor in several countries and has ties to Tampa, Florida; the Gaza Strip; Egypt; and London, England. He frequently wears eyeglasses, a moustache, and beard.

CAUTION

Ramadan Abdullah Mohammad Shallah is wanted for conspiracy to conduct the affairs of the designated international terrorist organization known as the "Palestinian Islamic Jihad" (PIJ) through a pattern of racketeering activities such as bombings, murders, extortions, and money laundering. Shallah was one of the original founding members of the PIJ and is presently the Secretary-General and leader of the organization, which has its headquarters located in Damascus, Syria. He was listed as a "Specially Designated Terrorist" under United States law on November 27, 1995. Shallah was indicted in a 53 count indictment in the United States District Court, Middle District of Florida, Tampa, Florida.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction of Ramadan Abdullah Mohammad Shallah.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Conspiracy to Commit Aircraft Piracy, to Commit Hostage Taking, to Commit Air Piracy Resulting in Murder, to Interfere With a Flight Crew, to Place a Destructive Device Aboard an Aircraft, to Have Explosive Devices About the Person on an Aircraft, and to Assault Passengers and Crew; Air Piracy Resulting in Murder; Air Piracy; Hostage Taking; Interference With Flight Crew; and Placing Explosives Aboard Aircraft; Placing Destructive Devices Aboard Aircraft; Assault Aboard Aircraft With Intent to Hijack With a Dangerous Weapon and Resulting in Serious Bodily Injury; Aiding and Abetting

HASAN IZZ-AL-DIN



Aliases:

Ahmed Garbaya, Samir Salwwan, Sa-id

DESCRIPTION

Date(s) of Birth Used:	1963	Hair:	Black
Place of Birth:	Lebanon	Eyes:	Black
Height:	5'9" to 5'11"	Sex:	Male
Weight:	145 to 150 pounds	Citizenship:	Lebanese
Build:	Slender	Language:	Arabic
Scars and Marks:	None known		

Scars and Marks: Remarks:

Izz-Al-Din is an alleged member of the terrorist organization, Lebanese Hizballah. He is thought to be in Lebanon.

CAUTION

Hasan Izz-Al-Din was indicted for his role in planning and participating in the June 14, 1985, hijacking of a commercial airliner which resulted in the assault on various passengers and crew members, and the murder of one United States citizen.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction of Hasan Izz-Al-Din.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Conspiracy to Commit Aircraft Piracy, to Commit Hostage Taking, to Commit Air Piracy Resulting in Murder, to Interfere With a Flight Crew, to Place a Destructive Device Aboard an Aircraft, to Have Explosive Devices About the Person on an Aircraft, and to Assault Passengers and Crew; Air Piracy Resulting in Murder; Air Piracy; Hostage Taking; Interference With Flight Crew; and Placing Explosives Aboard Aircraft; Placing Destructive Devices Aboard Aircraft; Assault Aboard Aircraft With Intent to Hijack With a Dangerous Weapon and Resulting in Serious Bodily Injury; Aiding and Abetting

MOHAMMED ALI HAMADEI



Photograph taken in 2005

Aliases: Mohammod Ali Hamadei, Ali Hamadi, "Castro"



Photograph taken in 2004

Black

Male

Lebanese

Arabic; German

Dark Brown

Date(s) of Birth Used: Place of Birth: Height: Weight: **Build**:

June 13, 1964 Lebanon 5'8" 150 pounds Medium

Scars and Marks: Remarks:

Hamadei has a mole on his right cheek below the eye. Hamadei is an alleged member of the terrorist organization, Lebanese Hizballah. He is thought to be in Lebanon.

CAUTION

Mohammed Ali Hamadei was indicted for his role and participation in the June 14, 1985, hijacking of a commercial airliner which resulted in the assault on various passengers and crew members, and the murder of one United States citizen.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction of Mohammed Ali Hamadei.

SHOULD BE CONSIDERED ARMED AND DANGEROUS

If you have any information concerning this person, please contact your local FBI office or the nearest American Embassy or Consulate.

DESCRIPTION

Hair:

Eyes:

Sex:

Citizenship:

Languages:



Conspiracy to Kill U.S. Nationals; Conspiracy to Murder U.S. Employees; Conspiracy to Use Weapons of Mass Destruction Against U.S. Nationals; Conspiracy to Destroy Property of the U.S.; Conspiracy to Attack National Defense Utilities; Bombing Resulting in Death; Use of Weapons of Mass Destruction Against U.S. Nationals; Murder While Using Destructive Device During a Crime of Violence; Murder of Federal Employees; Attempted Murder of Federal Employees

ABDELKARIM HUSSEIN MOHAMED AL-NASSER



DESCRIPTION

Date(s) of Birth Used: Place of Birth: Height: Weight: Build: Unknown Al Ihsa, Saudi Arabia 5'8" 170 pounds Unknown

Hair: Eyes: Complexion: Sex: Citizenship: Languages: Black Brown Olive Male Saudi Arabian Arabic; Farsi

Scars and Marks: Remarks: None known Al-Nasser is the alleged leader of the terrorist organization, Saudi Hizballah.

CAUTION

Abdelkarim Hussein Mohamed Al-Nasser has been indicted in the Eastern District of Virginia for the June 25, 1996, bombing of the Khobar Towers military housing complex in Dhahran, Kingdom of Saudi Arabia.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction of Abdelkarim Hussein Mohamed Al-Nasser.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Conspiracy to Kill U.S. Nationals; Conspiracy to Murder U.S. Employees; Conspiracy to Use Weapons of Mass Destruction Against U.S. Nationals; Conspiracy to Destroy Property of the U.S.; Conspiracy to Attack National Defense Utilities; Bombing Resulting in Death; Use of Weapons of Mass Destruction Against U.S. Nationals; Murder While Using Destructive Device During a Crime of Violence; Murder of Federal Employees; Attempted Murder of Federal Employees

AHMAD IBRAHIM AL-MUGHASSIL



Alias: Abu Omran

DESCRIPTION

Date(s) of Birth Used:	June 26, 1967	Hair:	Black
Place of Birth:	Qatif - Bab Al Shamal, Saudi	Eyes:	Brown
	Arabia	Complexion:	Olive
Height:	5'4"	Sex:	Male
Weight:	145 pounds	Citizenship:	Saudi Arabian
Build:	Unknown	Languages:	Arabic;
			Farsi

Scars and Marks:None knownRemarks:Al-Mughassil is the alleged head of the "military wing" of the terrorist organization, Saudi
Hizballah.

CAUTION

Ahmad Ibrahim Al-Mughassil has been indicted in the Eastern District of Virginia for the June 25, 1996, bombing of the Khobar Towers military housing complex in Dhahran, Kingdom of Saudi Arabia.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction of Ahmad Ibrahim Al-Mughassil.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Conspiracy to Kill United States Nationals, to Murder, to Destroy Buildings and Property of the United States, and to Destroy the National Defense Utilities of the United States

SAIF AL-ADEL



Aliases: Muhamad Ibrahim Makkawi, Seif Al Adel, Ibrahim Al-Madani

Hair: **Date(s) of Birth Used:** April 11, 1963; Dark April 11, 1960 **Eves:** Dark **Place of Birth:** Egypt **Complexion:** Olive Height: Unknown Sex: Male Weight: Unknown **Citizenship:** Egyptian **Build:** Unknown Language: Arabic **Scars and Marks:** None known Al-Adel is thought to be affiliated with the Egyptian Islamic Jihad (EIJ), and is believed to **Remarks:** be a high-ranking member of the Al-Qaeda organization.

CAUTION

Saif Al-Adel is wanted in connection with the August 7, 1998, bombings of the United States Embassies in Dar es Salaam, Tanzania, and Nairobi, Kenya.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction of Saif Al-Adel.

SHOULD BE CONSIDERED ARMED AND DANGEROUS

If you have any information concerning this person, please contact your local FBI office or the nearest American Embassy or Consulate.

DESCRIPTION



Conspiracy to Kill United States Nationals, to Murder, to Destroy Buildings and Property of the United States, and to Destroy the National Defense Utilities of the United States

ANAS AL-LIBY



Aliases:

Remarks:

Anas Al-Sabai, Anas Al-Libi, Nazih Al-Raghie, Nazih Abdul Hamed Al-Raghie

Hair: **Date(s) of Birth Used:** March 30, 1964; Dark May 14, 1964 **Eves:** Dark **Place of Birth:** Tripoli, Libya **Complexion:** Olive 5'10" to 6'2" Height: Male Sex: Weight: Unknown **Citizenship:** Libyan **Build:** Medium Languages: Arabic; English Al-Liby has a scar on the left side of his face. **Scars and Marks:**

Al-Liby has a scar on the left side of his face. Al-Liby recently lived in the United Kingdom, where he has political asylum. He usually wears a full beard.

CAUTION

Anas Al-Liby was indicted in the Southern District of New York, for his alleged involvement in the bombings of the United States Embassies in Dar es Salaam, Tanzania, and Nairobi, Kenya, on August 7, 1998.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction of Anas Al-Liby.

SHOULD BE CONSIDERED ARMED AND DANGEROUS

If you have any information concerning this person, please contact your local FBI office or the nearest American Embassy or Consulate.

DESCRIPTION



Damaging an Aircraft; Unlawful Placing of a Destructive Device on an Aircraft; Performing an Act of Violence Against an Individual on an Aircraft; Hostage Taking; Murder of United States Nationals Outside of the United States; Attempted Murder of United States Nationals Outside of the United States; Causing Serious Bodily Injury to United States Nationals Outside the United States; Assault on a Passenger; Malicious Damage to an Aircraft; Use of a Firearm During a Crime of Violence; Aircraft Piracy; Aiding and Abetting; Conspiracy to Commit Offenses Outside the United States

WADOUD MUHAMMAD HAFIZ AL-TURKI



Photograph taken in 2000

Aliases:

Remarks:

Sliman Ali Ahmad El Turki, Salman Ali El Turki, Bou Baker Muhammad, Sulaiman Alturki, Sulaiman Turki

DESCRIPTION

Date(s) of Birth Used:	June 21, 1955	Hair:	Black
Place of Birth:	Baghdad, Iraq	Eyes:	Dark
Height:	5'10" (180 centimeters)	Complexion:	Olive
Weight:	143 pounds (65 kilograms)	Sex:	Male
Build:	Medium	Citizenship:	Palestinian and possibly Iraci
Build:	Medium	Citizenship:	Palestinian and possibly Iraqi
Scars and Marks:	None known	Language:	Arabic, English

Al-Turki is a heavy smoker. He has worked as a civil engineer and is most likely residing in a Middle Eastern country. Al-Turki is believed to be a member of the Abu Nidal Organization.

CAUTION

Wadoud Muhammad Hafiz Al-Turki was indicted in the District of Columbia for his alleged role in the September 5, 1986, hijacking of Pan American World Airways Flight 73 during a stop in Karachi, Pakistan. The attack resulted in the murder of 20 passengers and crew, including two American citizens, and the attempted murder of 379 passengers and crew, including 89 American citizens.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction, in any country, of Wadoud Muhammad Hafiz Al-Turki.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Damaging an Aircraft; Unlawful Placing of a Destructive Device on an Aircraft; Performing an Act of Violence Against an Individual on an Aircraft; Hostage Taking; Murder of United States Nationals Outside of the United States; Attempted Murder of United States Nationals Outside of the United States; Causing Serious Bodily Injury to United States Nationals Outside the United States; Assault on a Passenger; Malicious Damage to an Aircraft; Use of a Firearm During a Crime of Violence; Aircraft Piracy; Aiding and Abetting; Conspiracy to Commit Offenses Outside the United States

MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL



Photograph taken in 2000

Aliases:

Abdullah Khalil Muhammad, Abdullah Muhammad Khalil, Khalil Antwan Iwan, Khalil Alid, Antawan Kaiwan Khalil

DESCRIPTION

Date(s) of Birth Used:	November 27, 1965	Hair:	Black	
Place of Birth:	Lebanon	Eyes:	Dark	
Height:	5'9" (175 centimeters)	Complexion:	Dark	
Weight:	143 pounds (65 kilograms)	Sex:	Male	
Build:	Medium	Citizenship:	Palestinian and possibly	
			Lebanese	
		Languages:	Arabic;	
			English	
Scars and Marks:	Ar-Rahayyal has a scar under his left eye and a scar on his right cheek.			
Remarks:	Ar-Rahayyal is most likely residing in a Middle Eastern country. He is believed to be a			

Ar-Rahayyal is most likely residing in a Middle Eastern country. He is believed to member of the Abu Nidal Organization.

CAUTION

Muhammad Abdullah Khalil Hussain Ar-Rahayyal was indicted in the District of Columbia for his alleged role in the September 5, 1986, hijacking of Pan American World Airways Flight 73 during a stop in Karachi, Pakistan. The attack resulted in the murder of 20 passengers and crew, including two American citizens, and the attempted murder of 379 passengers and crew, including 89 American citizens.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the apprehension or conviction, in any country, of Muhammad Abdullah Khalil Hussain Ar-Rahayyal.

Case 2.19-CV-0.1864 ODSLDEREED ARMEED AND PANGERGE 30 of 42



Providing Material Support to Terrorists; Conspiracy to Provide Material Support to Terrorists; Contributing Goods and Services to a Specially Designated Global Terrorist; Making False Statements

ZULKIFLI ABDHIR



Photograph taken in 2000



Aliases:

Marwan, Zulkifli Abd Hir, Zulkifli Bin Abdul Hir, Hulagu, Holagu, Lagu, Musa Abdul Hir, Zulkifli Abdul Hir, Zulkifli bin Hir, Abdul Hir Julkifli, Abduhir Bin Hir, Bin Abdul Hir Zulkifli, Zulkifli, Zulkifli Hir, Musa, Abdulhir Bin Hir, Ahmad Shobirin, Armand Escalante, Hassan, Hendri Lawi, Henri Lawi, Hogalu, Hugalu, Muslimin Abdulmotalib, Norhana Mohamad, Normina, Hashim, Omar Salem, Salim Alombra

DESCRIPTION

Date(s) of Birth Used: January 5, 1966; Black (Balding) Hair: October 5, 1966 **Eves:** Brown **Place of Birth:** Muar, Johor, Malaysia **Complexion:** Dark Height: 5'6" Sex: Male Weight: **Citizenship:** 120 pounds Malaysian **Build:** Languages: Malaysian; Slim English; Tagalog; Arabic

Scars and Marks: Remarks: None known

Abdhir is an engineer trained in the United States. It is believed that he has been living in the Southern Philippines since August of 2003.

CAUTION

Zulkifli Abdhir is thought to be the head of the Kumpulun Mujahidin Malaysia (KMM) terrorist organization and a member of Jemaah Islamiyah's (JI) central command. It is alleged that he is a supplier to terrorist organizations and also conducts bomb-making training for terrorist organizations, specifically the Abu Sayyaf Group. Abdhir was indicted on August 1, 2007, in the United States District Court, Northern District of California, and charged with providing material support to terrorists, conspiracy to provide material support to terrorists, contributing goods and services to a specially designated global terrorist, and making false statements.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$5 million for information leading directly to the capture of Zulkifli Abdhir.

SHOULD BE CONSIDERED ARMED AND DANGEROUS



Hostage Taking; Aiding and Abetting and Causing an Act to be Done

RADDULAN SAHIRON



Aliases: Radullan Sahiron, Radulan Sahiron, Radulan Sahirun, Commander Putol

DESCRIPTION

Place of Birth:	Kabbun Takas, Patikul, Jolo,	Hair: Eyes:	-
	Philippines	Sex:	Male
Height:	5'6"	Race:	Asian
Weight:	140 pounds	Citizenship:	Republic of the Philippines
Build:	Slight	Languages:	Tausug;
		0 0	Arabic

Scars and Marks: Sahiron's right arm is amputated above his elbow.
 Remarks: Sahiron is thought to be currently located in his ancestral domain at Patikul Jolo, Sulu, Philippines, an island approximately 600 miles south of Manila.

CAUTION

Raddulan Sahiron is wanted for his alleged involvement in the kidnapping of a United States Citizen. On November 14, 1993, the victim was abducted from his residence at Simbahan, Pangutaran, Sulu, Philippines, by approximately 14 armed members of the terrorist organization Al Harakat al Islamiyyah, also known as the Abu Sayyaf Group. The victim was transported to the terrorist's jungle camp on the Southern Philippine island of Jolo. He was held captive for 23 days until his release on December 7, 1993.

Sahiron was indicted in the United States District Court, District of Columbia, on February 27, 2007, and was charged with hostage taking and aiding and abetting and causing an act to be done. An arrest warrant was issued on the same date. Sahiron has been the overall leader of the Abu Sayyaf Group since 2005, and is believed to be in the area of Patikul Jolo, Sulu, Philippines.

REWARD

The Rewards For Justice Program, United States Department of State, is offering a reward of up to \$1 million for information leading to the arrest of Raddulan Sahiron.

SHOULD BE CONSIDERED ARMED AND DANGEROUS

EXHIBIT 4



EXHIBIT 5

Exhibit C

Transit Advertising Policy

King	County	King County Department Policies and Procedures		Procedures	
Title.		an an ann an Anna an Anna an Anna an Anna an Anna A	an a	Document Code No.	
	TRAN	ISIT ADVERTISING POLICY	-	CON 1-1-1 (D-P)	
Departm	ent/Issuing King (Agency County Department of Transportation, Transit Division		Date January 12, 2012	
Арргоче	MA	, Kevin Desmond, Transit C	eneral Manage	ir .	
1.0	SUBL	ECT TITLE: King County Department of Transportat Advertising Policy	ion, Transit Div	vision, Transit	
	1.1	EFFECTIVE DATE: January 12, 2012			
	1.2	TYPE OF ACTION: Superseding CON 1-1 (D-P)		-	
	1.3	KEY WORDS: (1) Transit; (2) Advertising			
2.0	2.0 <u>PURPOSE</u> :				
	2.1	King County Transit System. The King County Depart through its Transit Division, operates one of the largest			

- 1.1 Isting County Fransit Division, operates one of the largest bus systems in the nation, one that includes more than 225 bus routes throughout the County, with nearly 9,000 bus stops and more than 130 park-and-ride facilities connecting riders with those routes. The transit system is a vital component of the broad spectrum of public services the County provides. The County's transit advertising program is intended to generate revenue to support the transit system.
- 2.2 <u>Advertising as Revenue Source</u>. The County's transit operations are funded by a combination of federal, state and local funds, including grants and taxes, as well as fare box revenue. Advertising revenues are an important additional source of revenue that supports transit operations. The County's fundamental purpose in accepting transit advertising is to generate revenue to augment the Transit Division's operating budget.

The primary purpose of the County's transit system is to provide safe and efficient public transportation within its service area. Consistent with this purpose, the County places great importance on maintaining secure, safe, comfortable and convenient Transit Facilities and Transit Vehicles in order to, among other things consistent with the provision of effective and reliable public transportation, retain existing riders and attract new users of public transit services (KCC 28.96.020 and .210). To generate additional revenue while also accomplishing the primary objectives of transit

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Transit Advertising Policy

King County Department of Transportation, Transit Division Effective Date: January 12, 2012 CON 1-1-1 (D-P) Page 2 of 8

operations, the County will accept advertising on its Transit Facilities and Transit Vehicles only if such advertising complies with this Advertising Policy.

2.3 <u>Limited Public Forum Status</u>. The County's acceptance of transit advertising does not provide or create a general public forum for expressive activities. In keeping with its proprietary function as a provider of public transportation, and consistent with KCC 28.96.020 and .210, the County does not intend its acceptance of transit advertising to convert its Transit Vehicles or Transit Facilities into open public forums for public discourse and debate. Rather, as noted, the County's fundamental purpose and intent is to accept advertising as an additional means of generating revenue to support its transit operations. In furtherance of that discret and limited objective, the County retains strict control over the nature of the ads accepted for posting on or in its Transit Vehicles and Transit Facilities and maintains its advertising space as a limited public forum.

In the County's experience, certain types of advertisements interfere with the program's primary purpose of generating revenue to benefit the transit system. This policy advances the advertising program's revenue-generating objective by prohibiting advertisements that could detract from that goal by creating substantial controversy, interfering with and diverting resources from transit operations, and/or posing significant risks of harm, inconvenience, or annoyance to transit passengers, operators and vehicles. Such advertisements create an environment that is not conducive to achieving increased revenue for the benefit of the transit system or to preserving and enhancing the security, safety, comfort and convenience of its operations. The viewpoint neutral restrictions in this policy thus foster the maintenance of a professional advertising environment that maximizes advertising revenue.

This policy is intended to provide clear guidance as to the types of advertisements that will allow the County to generate revenue and enhance transit operations by fulfilling the following goals and objectives:

- Maximizing advertising revenue;
- Preventing the appearance of favoritism by the County;
- Preventing the risk of imposing demeaning or disparaging views on a captive audience;
- Maintaining a position of neutrality on controversial issues;
- Preserving the marketing potential of the advertising space by avoiding content that the community could view as demeaning, disparaging, objectionable, inappropriate or harmful to members of the public generally or to minors in particular;
- Maximizing ridership;
- Avoiding claims of discrimination and maintaining a non-discriminatory environment for riders;
- Preventing any harm or abuse that may result from running demeaning, disparaging or objectionable advertisements;

Exhibit C

Transit Advertising Policy

King County Department of Transportation, Transit Division Effective Date: January 12, 2012

CON 1-1-1 (D-P) Page 3 of 8

Reducing the diversion of resources from transit operations that is caused by demeaning, disparaging, objectionable, inappropriate or harmful advertisements.

The County's Transit Facilities and Transit Vehicles are a limited public forum and, as such, the County will accept only that advertising that falls within the categories of acceptable advertising specified in this viewpoint neutral policy and that satisfies all other access requirements and restrictions provided herein.

The County reserves the right to suspend, modify or revoke the application of any of the standards in this Policy as it deems necessary to comply with legal mandates, to accommodate its primary transportation function, or to fulfill the goals and objectives identified above. All of the provisions in this Policy shall be deemed severable.

- 2.4 <u>Application of Policy</u>. This Transit Advertising Policy applies to the posting of all new advertisements on Transit Facilities and Transit Vehicles on or after the Effective Date. Any advertisements which would be prohibited under this policy, but which were posted pursuant to the terms of a fully executed advertising contract prior to the Effective Date of this policy, will be allowed to remain posted for the duration of that contract.
- 2.5 <u>Disclaimer of Endorsement</u>. The County's acceptance of an advertisement does not constitute express or implied endorsement of the content or message of the advertisement, including any person, organization, products, services, information or viewpoints contained therein, or of the advertisement sponsor itself. This endorsement disclaimer extends to and includes content that may be found via internet addresses, quick response (QR) codes, and telephone numbers that may appear in posted ads and that direct viewers to external sources of information.
- 3.0 <u>ORGANIZATIONS AFFECTED</u>: King County Department of Transportation, Transit Division
- 4.0 **REFERENCES**:
 - 4.1 Transit Code of Conduct, chapter 28.96 KCC
 - 4.2 Public Transit Definitions, chapter 28.92 KCC
 - 4.3 King County Charter Section 320.20: Provides that the county executive "shall have the power to assign duties to administrative offices and executive departments which are not specifically assigned by this charter or ordinance. . . ."
 - 4.4 Executive Policy/Procedures No. INF 7-1D-1 (AEP): Approval and Routing Procedures for General Department Policics/Procedures (D-P's) and Department Work Procedures (D-W)

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Exhibit C

Transit Advertising Policy

King County Department of Transportation, Transit Division Effective Date: January 12, 2012 CON 1-1-1 (D-P) Page 4 of 8

5.0 <u>DEFINITIONS</u>:

- 5.1 <u>Transit Facilities</u>. Transit Facilities include the downtown Seattle transit tunnel (KCC 28.92.190), transit tunnel mezzanine areas (KCC 28.92.200) and transit tunnel platform areas (KCC 28.92.210).
- 5.2 <u>Transit Vehicles</u>. Transit Vehicles include all transit passenger buses, trolleys and street railcars.

6.0 <u>POLICIES</u>:

- 6.1 <u>Permitted Advertising Content</u>: The following classes of advertising are authorized on or in Transit Facilities and Transit Vehicles:
 - 6.1.1 <u>General Allowance for Advertising</u>. Advertising that does not include any material that qualifies as Prohibited Advertising under Subsection 6.2 of this Advertising Policy.
 - 6.1.2 <u>King County Transit Advertising</u>. The County has the right to display advertising sponsored by the King County Transit Division to promote the King County Transit System or any of the functions or programs carried out by the Transit Division.
- 6.2 <u>Prohibited Advertising Content</u>: Advertising is prohibited on or in Transit Facilities and Transit Vehicles if it includes any of the following content:
 - 6.2.1 <u>Political Campaign Speech</u>. Advertising that promotes, or opposes a political party, the election of any candidate or group of candidates for federal, state or local government offices, or initiatives, referendums or other ballot measures.
 - 6:2.2 <u>Prohibited Products, Services or Activities</u>. Any advertising that (i) promotes or depicts the sale, rental, or use of, participation in, or images of the following products, services or activities; or (ii) that uses brand names, trademarks, slogans or other material that are identifiable with such products, services or activities:
 - (a) <u>Tobacco</u>. Tobacco products, including but not limited to cigarettes, cigars, and smokeless (e.g., chewing) tobacco;
 - (b) <u>Alcohol</u>. Beer, wine, distilled spirits or any alcoholic beverage licensed and regulated under Washington law, however, this prohibition shall not prohibit advertising that includes the name of a restaurant that is open to minors;

Exhibit C Contract 5506032 Transit Advertising Policy King County Department of Transportation, Transit Division CON 1-1-1 (D-P) Effective Date: January 12, 2012 Page 5 of 8 Firearms. Firearms, ammunition or other firearms-related (c) products. Adult/ Mature Rated Films, Television or Video Games. Adult (d) films rated "X" or "NC-17", television rated "MA" or video games rated "A" or "M"; Adult Entertainment Facilities. Adult book stores, adult video (e) stores, nude dance clubs and other adult entertainment establishments; Other Adult Services. Adult telephone services, adult internet (f) sites and escort services. Sexual and/or Excretory Subject Matter. Any advertising that contains or 6.2.3 involves any material that describes, depicts or represents sexual or excretory organs or activities in a way: that the average adult person, applying contemporary (a) community standards, would find, when considered as a whole, appeals to the prurient interest of minors in sex; or (b) which is patently offensive to contemporary standards in the adult community as a whole with respect to what is suitable

- (c) that depicts, or reasonably appears to depict, a person under the
- age of eighteen (18) exhibiting his or her sexual or excretory organs or engaging in sexual or excretory activities.

For purposes of this subsection, "sexual or excretory organs" shall mean and include the male or female pubic area, anus, buttocks, genitalia, or any portion of the areola or nipple of the female breast and "sexual or excretory activities" shall mean and include actual or simulated sex acts of every nature (including but not limited to touching of one's own or another's clothed or unclothed sexual or excretory organs), urination and defecation.

- 6.2.4 <u>False or Misleading</u>. Any material that is or that the sponsor reasonably should have known is false, fraudulent, misleading, deceptive or would constitute a tort of defamation or invasion of privacy.
- 6.2.5 <u>Copyright, Trademark or Otherwise Unlawful</u>. Advertising that contains any material that is an infringement of copyright, trademark or service mark, or is otherwise unlawful or illegal.

Transit Advertising Policy

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- 6.2.6 <u>Illegal Activity</u>. Any advertising that promotes any activity or product that is illegal under federal, state or local law.
- 6.2.7 <u>Profanity and Violence</u>. Advertising that contains any profane language, or portrays images or descriptions of graphic violence, including dead, mutilated or disfigured human beings or animals, the act of killing, mutilating or disfiguring human beings or animals, or intentional infliction of pain or violent action towards or upon a person or animal,
- 6.2.8 <u>Demeaning or Disparaging</u>. Advertising that contains material that demeans or disparages an individual, group of individuals or entity. For purposes of determining whether an advertisement contains such material, the County will determine whether a reasonably prudent person, knowledgeable of the County's ridership and using prevailing community standards, would believe that the advertisement contains material that ridicules or mocks, is abusive or hostile to, or debases the dignity or stature of any individual, group of individuals or entity.
- 6.2.9 <u>Harmful or Disruptive to Transit System</u>. Advertising that contains material that is so objectionable as to be reasonably foreseeable that it will result in harm to, disruption of or interference with the transportation system. For purposes of determining whether an advertisement contains such material, the County will determine whether a reasonably prudent person, knowledgeable of the County's ridership and using prevailing community standards, would believe that the material is so objectionable that it is reasonably foreseeable that it will result in harm to, disruption of or interference with the transportation system.
- 6.2.10 <u>Lights, Noise and Special Effects</u>. Flashing lights, sound makers, mirrors or other special effects that interfere with the safe operation of the bus or the safety of bus riders, drivers of other vehicles or the public at large.
- 6.2.11 <u>Unsafe Transit Behavior</u>. Any advertisement that encourages or depicts unsafe behavior with respect to transit-related activities, such as non-use of normal safety precautions in awaiting, boarding, riding upon or debarking from transit vehicles.
- 6.3 Additional Requirements:
 - 6.3.1 <u>Sponsor Attribution and Contact Information</u>. Any advertising in which the identity of the sponsor is not readily and unambiguously identifiable must include the following phrase to identify the sponsor in clearly visible letters (no smaller than 72 point type for exteriors and 24 point type for interiors):

Paid for by

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Exhibit C

Transit Advertising Policy

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"Teaser ads" that do not identify the sponsor will, however, be allowed so long as a similar number of follow up advertisements are posted within eight weeks of the initial teaser ads that do identify the sponsor of those initial ads.

All proposed transit advertising must be submitted to the

review. The Transit Advertising Contractor will perform a preliminary evaluation of the submission to assess its compliance with this policy. If, during its preliminary review of a proposed advertisement, the Transit

Advertising Contractor is unable to make a compliance determination, it will forward the submission to the Transit Advertising Program Manager for further evaluation. The Transit Advertising Contractor may at

advertisement one or more revisions to an advertisement, which, if undertaken, would bring the advertisement into conformity with this Advertising Policy. The Transit Advertising Contractor will immediately remove any advertisement that the Transit Division at any time

The Transit Advertising Program Manager will review the

discretion of the Transit Advertising Program Manager, any proposed transit advertising may be submitted to the

proposed advertisement for compliance with the guidelines set forth in this policy and will direct the Transit Advertising Contractor as to whether the proposed advertisement will be accepted. In the

Transit Division General Manager for review.

any time discuss with the entity proposing the

Transit Advertising Contractor for initial compliance

7.0 **PROCEDURES**:

Action By:

Action:

7.1

7.2

Transit Advertising Contractor

Transit Advertising Program Manager

Transit Division General 7.3 Manager

Transit Advertising7.4Program Manager andTransit Division General

The Transit Division General Manager shall conduct a final review of proposed advertising at the request of the Transit Advertising Program Manager. The decision of the Transit Division General Manager to approve or reject any proposed advertising shall be final.

The Transit Advertising Program Manager or the Transit Division General Manager may consult with other appropriate County employees, including the County's

7

directs it to remove.

Exhibit C

Transit Advertising Policy

King County Department of Transportation, Transit Division Effective Date: January 12, 2012

Action:

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Action By:

Manager

legal counsel, at any time during the review process.

8.0 <u>RESPONSIBILITIES</u>: The Transit Advertising Program Manager and Transit Division General Manager are responsible for the implementation of this Transit Advertising Policy.