

KTC:JK/MM
F.#2006R00688

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

RUSSELL DEFREITAS,
also known as "Mohammed,"
KAREEM IBRAHIM,
also known as "Amir Kareem,"
ABDUL KADIR and
ABDEL NUR,

Defendants.

UNDER SEAL

C O M P L A I N T

(18 U.S.C. §§ 32(a)(8),
844(n), 1992(a)(8),
1992(a)(10), 1992(c)(1),
1992(c)(2), 2332f(a)(2),
2332f(b)(1)(E),
2332f(b)(2)(A),
2332f(c), 2 and
3551 et seq.)

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EASTERN DISTRICT OF NEW YORK, SS:

ROBERT ADDONIZIO, being duly sworn, deposes and states that he is a Detective/Investigator with the Kings County District Attorney's Office assigned to the Joint Terrorism Task Force, duly appointed according to law and acting as such.

Upon information and belief, in or about and between January 2006 and the present, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants RUSSELL DEFREITAS, also known as "Mohammed," KAREEM IBRAHIM, also known as "Amir Kareem," ABDUL KADIR and ABDEL NUR, together with others, did knowingly and intentionally conspire to unlawfully deliver, place, discharge and detonate an

explosive device in, into and against a public transportation system, to wit: John F. Kennedy International Airport, and an infrastructure facility, to wit: fuel tanks and pipelines at John F. Kennedy International Airport, with the intent to cause death and serious bodily injury and the intent to cause extensive destruction of such system and facility, where such destruction would result in and would be likely to result in major economic loss, in violation of Title 18, United States Code, Section 2332f(a)(1).

(Title 18, United States Code, Sections 2332f(a)(2), 2332f(b)(1)(E), 2332f(b)(2)(A), 2332f(c) and 3551 et seq.)

Upon information and belief, in or about and between January 2006 and the present, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants RUSSELL DEFREITAS, also known as "Mohammed," KAREEM IBRAHIM, also known as "Amir Kareem," ABDUL KADIR and ABDEL NUR, together with others, did knowingly and intentionally conspire to maliciously damage and destroy, by means of fire and an explosive, a building and other real property used in interstate and foreign commerce and in an activity affecting interstate and foreign commerce, to wit: buildings and property at John F. Kennedy International Airport, in violation of Title 18, United States Code, Section 844(i).

(Title 18, United States Code, Sections 844(n) and 3551

et seq.)

Upon information and belief, in or about and between January 2006 and the present, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants RUSSELL DEFREITAS, also known as "Mohammed," KAREEM IBRAHIM, also known as "Amir Kareem," ABDUL KADIR and ABDEL NUR, together with others, did knowingly and intentionally conspire to place and cause to be placed a destructive device and substance in, upon and in proximity to, and otherwise make and cause to be made unworkable and unusable, aircraft in the special aircraft jurisdiction of the United States and civil aircraft used, operated and employed in interstate, overseas and foreign air commerce, and parts and other materials used and intended to be used in connection with the operation of such aircraft, where such placing and causing to be placed and such making and causing to be made is likely to endanger the safety of any such aircraft, in violation of Title 18, United States Code, Section 32(a)(2).

(Title 18, United States Code, Sections 32(a)(8) and 3551 et seq.)

Upon information and belief, in or about and between January 2006 and the present, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants RUSSELL DEFREITAS, also known as "Mohammed," KAREEM IBRAHIM, also known as "Amir Kareem," ABDUL KADIR and

ABDEL NUR, together with others, did knowingly and intentionally conspire to set fire to and place a destructive substance and device in, upon and near a terminal, structure, supply and facility used in the operation of, and in support of the operation of, a mass transportation vehicle, to wit: fuel tanks, pipelines and buildings at John F. Kennedy International Airport, without lawful authority and permission, with intent to, and knowing and having reason to know, such activity would likely disable and wreck a mass transportation vehicle used, operated and employed by a mass transportation provider, in violation of Title 18, United States Code, Section 1992(a)(4)(B).

(Title 18, United States Code, Sections 1992(a)(10), 1992(c)(1), 1992(c)(2) and 3551 et seq.)

Upon information and belief, in or about and between September 2006 and the present, both dates being approximate and inclusive, within the Eastern District of New York, the defendants RUSSELL DEFREITAS, also known as "Mohammed," and ABDUL KADIR, together with others, did knowingly and intentionally surveil, photograph, videotape, diagram and otherwise collect information with the intent to plan and assist in planning the setting fire to and placement of a destructive substance and device in, upon and near a terminal, structure, supply and facility used in the operation of, and in support of the operation of, a mass transportation vehicle, to wit: fuel tanks,

pipelines and buildings at John F. Kennedy International Airport, without lawful authority and permission, with intent to, and knowing and having reason to know, such activity would likely disable and wreck a mass transportation vehicle used, operated and employed by a mass transportation provider.

(Title 18, United States Code, Sections 1992(a)(8), 1992(c)(1), 1992(c)(2), 2 and 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I have been a Detective/Investigator assigned to the New York Joint Terrorism Task Force ("JTTF") for approximately three years. My information about this investigation comes from my review of reports, e-mails, and tapes and transcripts of certain recorded meetings and telephone calls. I have also relied on information provided to me by other agents and law enforcement officials. Excerpts of documents and tape-recorded conversations, when referred to herein, are from summaries and draft transcripts; they are not exact quotes.

THE TARGETS

2. John F. Kennedy International Airport ("JFK"), located in Queens, New York, is situated on land owned by the City of New York and leased to the Port Authority of New York and

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

New Jersey (the "Port Authority") for operation. JFK provides regular air transportation services to the general public, including both passenger and cargo services. According to an official at the Port Authority, over one thousand airplanes, most of which provide regular and continuing general transportation services to the public, depart and arrive at JFK on an average day; approximately half of those flights are international flights. The Port Authority estimates that, in 2007, approximately 45 million passengers will travel through JFK, and approximately 1.5 million tons of cargo, valued at approximately \$120 billion, will be transported through JFK.

3. Fuel tanks located at JFK Airport are linked to the Buckeye Pipeline, which distributes fuel and other petroleum products to various sites from approximately Allentown, Pennsylvania through New Jersey, Staten Island, Brooklyn and Queens, New York, among other locations. The Buckeye Pipeline is the primary transporter of jet fuel into JFK and other New York area airports.

THE DEFENDANTS

4. The defendant RUSSELL DEFREITAS, also known as "Mohammed," is a United States citizen from Guyana, who was previously employed at JFK. The defendant KAREEM IBRAHIM, also known as "Amir Kareem," is a citizen of Trinidad. The defendant ABDUL KADIR is a citizen of Guyana, who has served as a member of

the Guyanese Parliament and as the mayor of Linden, Guyana. The defendant ABDEL NUR is a citizen of Guyana.

THE PLOT

5. As set forth in detail below, in or about and between January 2006 and the present, the defendants RUSSELL DEFREITAS, also known as "Mohammed," KAREEM IBRAHIM, also known as "Amir Kareem," ABDUL KADIR and ABDEL NUR, together with others, plotted to destroy JFK, and buildings, facilities, fuel tanks and fuel pipelines at and near JFK, through the use of explosives. In connection with that plot, the defendants performed physical surveillance, made video recordings of JFK and its buildings and facilities, located satellite photographs of JFK and its buildings and facilities on the internet, and sought expert advice, financing and explosives.

PROBABLE CAUSE

6. On or about July 13, 2006, a confidential source (the "Source")² and another individual met DEFREITAS at the Gertz Plaza Mall in Queens, New York. DEFREITAS greeted the Source and

² The government has been working with the Source since 2004. The Source was convicted on federal drug trafficking and RICO charges in the Southern District of New York in 1996. The Source was also convicted on drug trafficking charges in New York Supreme Court in 2003. His sentence in that case is pending as part of his cooperation agreement with the government. In addition to the expectation of a reduced sentence in exchange for his cooperation, the Source also receives financial assistance. The Source has provided extremely credible information that has been corroborated by consensual recordings, e-mails, financial documents, surveillance and other records and information.

the other individual and said that it had been a long time since he had seen them. DEFREITAS stated that he was sure that he knew the Source from a mosque in Brooklyn.

7. DEFREITAS and the Source met again on or about July 28, 2006. DEFREITAS told the Source that he was traveling to Guyana in mid-August and would stay through the end of Ramadan. (Ramadan occurred on or about and between September 24 and October 24, 2006).

8. On or about August 1, 2006, the Source met DEFREITAS at a store in Brooklyn and drove DEFREITAS to his residence. During a discussion of the war then taking place in Lebanon, DEFREITAS and the Source agreed that Muslims always incur the wrath of the world while Jews get a 'pass.' DEFREITAS confided to the Source that he had a vision that would make the World Trade Center attack seem small. He did not discuss the details. Later in the conversation, DEFREITAS said that while it appeared that only Arab Muslims were fighting the war for Islam, many other nationalities of Muslims were involved in the fight as well.

9. On or about August 2, 2006, the Source met DEFREITAS at a store in Brooklyn and drove him to a residence where DEFREITAS picked up clothes to take with him to Guyana. During the drive, DEFREITAS said that someone unknown to the Source had vouched for the Source; he did not identify the

individual, but said that the Source had done something for him. DEFREITAS then invited the Source to meet him in Guyana for Ramadan. In the Source's presence, DEFREITAS placed a telephone call to Guyana and spoke with another individual ("Individual A"). Individual A is a citizen of Guyana. DEFREITAS handed the phone to the Source, and the Source and Individual A exchanged greetings. After the call, DEFREITAS said that Individual A was very knowledgeable and urged the Source to stay in contact with Individual A. DEFREITAS told the Source that he (the Source) was "the right man for the job," but did not further explain.

10. On or about August 7, 2006, the Source met DEFREITAS and drove him around New York City on errands. During the drive, DEFREITAS asked the Source whether he could talk to him about something confidential. The Source said yes. DEFREITAS again mentioned, in sum and substance, that there were 'brothers' who wanted to do something bigger than the World Trade Center. He said the 'brothers' were not Arabs, but rather were from Trinidad and Guyana. DEFREITAS asked the Source, in sum and substance, whether he was interested, and the Source responded affirmatively. DEFREITAS added that the 'brothers' would come from Guyana and Trinidad to New York to conduct the operation. DEFREITAS stated that Individual A was involved with the plan.

11. On or about August 8, 2006, DEFREITAS gave the Source further information about the plan, and again recruited

him to join. The meeting was consensually recorded. DEFREITAS said the operation involved a "cell" of "six or seven" people, but that he (DEFREITAS) did not know the specific details. DEFREITAS explained, cryptically, that the plan involved JFK and that members of the cell would come to JFK by aircraft, "do what they have to do and get out." DEFREITAS stated that he had worked at JFK but was retired. He explained that this job had given him unique knowledge of the airport. DEFREITAS told the Source that they had been searching for someone in New York whom they could trust to be part of the operation, and that the Source had been sent by Allah to be the one. DEFREITAS stated that another individual ("Individual B") was also part of the plot, but that he (DEFREITAS) did not want to introduce the Source to him until the Source traveled to Guyana and was vetted there.

12. DEFREITAS traveled to Guyana on or about August 17, 2006. The Source spoke with DEFREITAS and Individual A on the telephone several times about the Source's upcoming trip there. In a consensually-recorded telephone conversation between Individual A and the Source on or about September 10, 2006, Individual A stated: "Can I ask you a question. Would you like to die as a martyr?" In order to ingratiate himself with Individual A, the Source answered that this was the greatest way to die in Islam.

13. The Source traveled to Guyana for Ramadan on or

about September 20, 2006, and stayed until October 27. During the early part of his stay in Guyana, the Source had several meetings with DEFREITAS, Individual A and another individual ("Individual C") about the JFK plot. In a meeting among Individual A, the Source and Individual C on or about September 24, 2006, Individual A said that the plan involved several people, but he did not identify them. Individual A commented that the United States has the technology to prevent an attack from the "outside," but that it cannot prevent events such as the September 11th attacks. On or about September 27, 2006, Individual A and Individual C told the Source that the three of them would travel to Trinidad to discuss the plan with a fourth individual ("Individual D").

14. On or about September 29, 2006, another individual from Guyana ("Individual E") came to Individual A's residence. Individual E is a citizen of Guyana. Individual A introduced Individual E to the Source. In the course of their conversation, Individual E told the Source that he helps "brothers" who have a basic knowledge of Islam and want to perform jihad. He said that he takes care of the individuals' basic needs while they are performing their jihad duties.

15. On or about October 7, 2006, Individual E, Individual A and the Source met at Individual E's business in Georgetown, Guyana. Individual A told Individual E that he had

arranged the meeting to talk about jihad. Individual E asked what type of jihad, and Individual A said the physical kind. Individual E suggested that Individual A should get involved in teaching Islam, so that he could select serious individuals who were right for jihad. Individual E told Individual A that he had to be careful about who he approached about jihad, and mentioned the case of Sheikh Abdel Rahman and his attorney (Lynne Stewart).

16. On or about October 10, 2006, Individual E, Individual A, DEFREITAS and the Source met at Individual E's office. Individual A told Individual E that they were working on two plans: one to smuggle individuals, including mujahideen, from Asia into Guyana and then into the United States; and a second to attack the United States where it would inflict the most harm. Two days later, DEFREITAS, the Source, Individual A, Individual C, and Individual E met again at Individual E's office. At the start of the meeting, Individual E described an occasion when he had seen U.S. helicopters parked at the Guyanese airport for an air show, and considered blowing them up. Individual A replied that he thought he (Individual A) was the only one with those thoughts. Individual E also said that he was close friends with a leader of the Trinidadian Muslim group Jamaat Al Muslimeen³

³Jamaat al Muslimeen ("JAM") is a Muslim organization based in Trinidad. Over a six day period in 1990, approximately 100 members of JAM staged a coup attempt in Trinidad, storming the Trinidad Parliament building and taking the Prime Minister and Cabinet hostage. The siege led to chaos and widespread rioting in the

(the "JAM leader").

17. At that meeting on October 10, 2006, Individual A informed Individual E about the details of the terrorist attack that they had planned. Individual A explained that the plan involved exploding the fuel line that fed fuel to JFK airport. Individual A stated that the fuel line was one of the largest in the United States, and that exploding it would cause greater destruction than the September 11th attacks. Individual E agreed to take part in the plan, but cautioned that they should avoid talking about it over the telephone or to anyone not directly involved. He said that he knew individuals in Guyana who would participate. Individual E provided code names for their plan and for JFK to be used in later conversations.

18. Over the next two weeks, Individual E, Individual A, DEFREITAS, the Source and Individual C met several times to discuss the JFK attack. Individual A suggested that DEFREITAS and the Source return to New York to conduct surveillance at JFK and determine what kind of explosive device would be appropriate for the plan.

19. During November and December 2006, Individual E, Individual A, DEFREITAS and Individual C continued to meet in

streets of Port of Spain, Trinidad, resulting in numerous deaths. The JAM members involved in the coup attempt received general amnesty to end the hostage standoff. Over the past several years, JAM has been involved in several murders, kidnappings for ransom, narcotics and weapons trafficking, money laundering and extortion.

Guyana regarding the JFK plot and gave the Source telephonic updates. The telephone calls were consensually recorded. The two major topics of discussion were: (a) plans for DEFREITAS to meet the Source in New York to conduct pre-operational surveillance of JFK; and (b) plans for an associate of Individual E, defendant ABDEL NUR, a citizen of Guyana, to travel to Trinidad to arrange a meeting with Individual D, through the JAM leader. Individual E's initial plan was for NUR to travel to Trinidad in early December, prior to DEFREITAS's trip to New York. According to Individual E, this trip was delayed because NUR's passport had expired.

20. DEFREITAS traveled to New York from Guyana on or about January 1, 2007, on a round-trip ticket paid for by Individual E. During a consensually recorded conversation with the source on January 1, DEFREITAS described how he and the Source would take pictures of JFK. DEFREITAS said that he and the Source would go to cargo areas at JFK with unrestricted access, and that the pipeline that fed fuel to JFK was located behind a gas station near the cargo area. DEFREITAS expressed concern that security would likely stop them if they tried to take pictures at this location. DEFREITAS told the Source that years earlier he had conducted multiple tests of the security at JFK. He explained that he had previously been able to access restricted areas while visiting friends who worked at the

airport, but that now identification was needed.

21. On or about January 2, 2007, in a consensually recorded conversation, DEFREITAS told the Source about the incident that motivated his desire to strike JFK. In particular, DEFREITAS claimed that, while working at JFK airport, he saw military parts being shipped to Israel, including missiles, that he felt would be used to kill Muslims. According to DEFREITAS, as a result, he "wanted to do something to get those bastards." DEFREITAS stated that the plot was a big job for which the plotters had to get everything in order.

22. DEFREITAS and the Source conducted surveillance at JFK four times - on or about January 3, 4, 10 and 11, 2007. During each trip, DEFREITAS and the Source traveled in the Source's vehicle, and DEFREITAS directed the Source where to go. Law enforcement officers conducted their own surveillance of DEFREITAS and the Source during each trip. In addition, during each trip, audio and video equipment, consensually installed inside the Source's vehicle by the JTTF, recorded what took place.

23. During the January 3, 2007 trip to JFK, which DEFREITAS initiated, DEFREITAS first directed the Source to a gas station located near the entrance of the airport roadway, and pointed to fuel tanks by the station as a possible target for attack. DEFREITAS then directed the Source to another location

near Terminal One, and pointed out additional fuel tanks as possible targets. According to a Port Authority official, the fuel tanks pointed out by DEFREITAS are facilities that provide fuel to airplanes at JFK that provide regular and continuing air transportation service to the public.

24. DEFREITAS then directed the Source to a roadway on the other side of the airport where they could see several parked airplanes. DEFREITAS commented that civilian security that patrolled the airport during the day was minimal, but that police coverage at night was not. DEFREITAS pointed out JFK's control tower and commented that the tower monitored the roadways at the airport in addition to tracking incoming and outgoing flights.

25. During the return drive from JFK on January 3, the Source engaged DEFREITAS in a consensually recorded conversation about Individual E's intentions. DEFREITAS said that Individual E "really wants to get this thing going. He's very sincere about it. . . . So he really want[s] to get it done but he want[s] to get it done the right way. That we don't want to regret starting something that we can't finish." He explained that Individual E was sending NUR to Trinidad because "he is the only one who knows the man well," an apparent reference to the JAM leader.

26. Later that evening, DEFREITAS and the Source called Individual E to report on their surveillance. The call was consensually recorded. Referring to his surveillance of JFK,

DEFREITAS told Individual E "mission accomplished today," and Individual E replied, "All right, that's good, that's good, that's good." DEFREITAS told Individual E that he had seen Pat Robertson on television predicting that a disaster would hit America and that a tsunami would hit several states. DEFREITAS stated: "So he's probably not too far off, huh?" Individual E laughed.

27. DEFREITAS and the Source returned to JFK the next day, January 4, 2007. As set forth above, law enforcement officers conducted surveillance of DEFREITAS, and the consensually installed audio and video equipment recorded what occurred inside the Source's vehicle. DEFREITAS told the Source: "I got to show you all the escape routes. . . how to get in, and how to get out." DEFREITAS directed the Source to the back side of the airport, and then to another roadway inside the airport. He led the Source to another target, fuel tanks at a location next to a small body of water, and discussed blowing them up. DEFREITAS said that security there was virtually non-existent. DEFREITAS then showed the Source an "escape route" to the Belt Parkway in Brooklyn, referring to a getaway route for the operation. According to a Port Authority official, the fuel tanks pointed out by DEFREITAS near the body of water are facilities that provide fuel to airplanes at JFK that provide regular and continuing air transportation service to the public.

28. During the return drive from JFK, DEFREITAS discussed the extent of the damage they could cause. In particular, DEFREITAS predicted that the plot would result in the destruction of "the whole of Kennedy," that only a few people would escape and that, due to underground piping, part of Queens would explode. DEFREITAS went on to predict that, as a result of the plot, DEFREITAS and the Source would "get our blessings and our rewards" and "a place in paradise." DEFREITAS further boasted about the effect on the United States of blowing up Kennedy Airport:

Anytime you hit Kennedy, it is the most hurtful thing to the United States. To hit John F. Kennedy, wow. [] They love John F. Kennedy like he's the man []. If you hit that, this whole country will be in mourning. It's like you can kill the man twice.

29. During the consensually recorded conversation, DEFREITAS also described how he had been waiting several years for the right opportunity to execute his plans. According to DEFREITAS, he had been considering this "from the time I worked in the airport, before terrorism started in this country..." DEFREITAS boasted that he had been taught to make bombs in Guyana. DEFREITAS further explained that when he worked at the airport:

these things used to come into my brain - well, I could blow this place up. When I was [] I could make a bomb. I could knock this place [] I ain't gettin' nothin' for it. So I would just wipe it out my head. And then I

would go some place again, and I would see the same thing. And I would sit and see a plane taxiing up the runway. And I would say, if I could get a rocket, then I could do a hit. By myself, I am thinking these things. But I had no connections with no Arabs or nobody - I'm a Muslim working in the airport for so many years. I'm not [], but very knowledgeable. But nobody ever approached me.

Later that evening, DEFREITAS and the Source called Individual E on the telephone to report on the surveillance.

30. DEFREITAS and the Source returned to JFK again on or about January 10, 2007. Law enforcement officers conducted surveillance of DEFREITAS, and the consensually installed audio and video equipment recorded what occurred inside the Source's vehicle. DEFREITAS directed the Source to different areas where fuel tanks were located - possible targets for the operation. According to a Port Authority official, the fuel tanks pointed out by DEFREITAS are facilities that provide fuel to airplanes at JFK Airport that provide regular and continuing air transportation service to the public.

31. DEFREITAS videotaped the locations while the Source drove the vehicle.⁴ During the return drive from JFK, DEFREITAS explained to the Source that terrorists had wrongly focused their attention for attacks on the terminals at JFK, not the fuel tanks: "[N]obody knows how to get into Kennedy or how to

⁴ DEFREITAS and the Source had purchased the video camera in Manhattan on January 7, 2007. The Source paid for it.

hit Kennedy. They're only looking at the terminal. If you hit them tanks, it's the whole terminal down."

32. On or about January 11, 2007, DEFREITAS again instructed the Source to drive to JFK, explaining that he wanted to show him a different way to enter. Law enforcement officers conducted surveillance of DEFREITAS, and the consensually installed audio and video equipment recorded what occurred inside the Source's vehicle. Once inside the airport roadway, DEFREITAS directed the Source to a building where they conducted surveillance of parked airplanes. DEFREITAS videotaped the area, including the airplanes. After returning to DEFREITAS's apartment, DEFREITAS instructed the Source to make still photographs of the best parts of the video. The Source was unable to do so. Later, the Source provided the JTTF with copies of the videos of JFK that DEFREITAS captured on these two trips.

33. DEFREITAS and the Source returned to Guyana on or about January 14, 2007, carrying with them the JFK videos. They played the JFK videos for Individual E and Individual A. Individual E stated that he was pleased and that they could use dynamite to blow up the fuel tanks. Individual A opined that the tanks appeared to be made of titanium, and recommended utilizing a chemical that would penetrate the metal. They also discussed the Trinidad trip to meet with Individual D. Individual E said that he would send Individual A, DEFREITAS and the Source to

Trinidad, and identified the mosque where they would meet with Individual D. In a later meeting, DEFREITAS and the Source showed the JFK video to NUR.

34. On or about January 22, 2007, the Source met with Individual E and discussed how Individual E could obtain explosives for the plot. Over the next several days, Individual E and Individual A became increasingly suspicious that Individual C was a spy for the Guyanese government. Individual A told the Source that he (Individual A) would not travel to Trinidad because of these suspicions. Then, on or about February 13, 2007, Individual E, DEFREITAS and the Source engaged in a heated argument, in part because the Source had removed the JFK video from Individual E's computer. Individual E initially said that he wanted to delay the plot for a few months so that he could focus on his business, and then stated that he wanted to cut off his involvement altogether.

35. DEFREITAS told the Source that he was determined to get to Trinidad and present the JFK plot to the JAM leader. DEFREITAS then contacted several associates in Guyana, including a person identified herein as Individual F, a citizen of Guyana. On or about February 18, 2007, DEFREITAS and the Source met with Individual F, and DEFREITAS told him about the JFK plot and their desire to discuss it with the JAM leader. They took Individual F to an internet café to show him the JFK video.

36. Individual F identified two associates whom he thought might be interested in the plot. The first was the defendant ABDUL KADIR, a citizen of Guyana, who, as set forth above, was a member of the Guyanese Parliament, the former mayor of Linden, Guyana and an imam. According to Individual F, KADIR had connections with militants in the Middle East and South America.

37. On or about February 19, 2007, DEFREITAS, Individual F and the Source traveled to Linden, Guyana to meet with KADIR. Individual F told KADIR that DEFREITAS and the Source wanted to show him a video of a plan they were working on, in order to see whether KADIR was interested in helping it come to fruition. They loaded the JFK video onto KADIR's computer and played it for him. KADIR expressed interest, saying that he needed a few weeks to contact some associates who would probably help them. KADIR code-named the project "the chicken hatchery" or "chicken farm" for future communications. KADIR, Individual F, DEFREITAS and the Source left KADIR's residence, and KADIR introduced them to his son, who lived down the street.

38. DEFREITAS, KADIR and the Source met in Georgetown, Guyana two days later, February 22, 2007. They walked together to a mall in downtown Georgetown. After arriving at the mall, KADIR informed the Source that the reason they had walked there is so that the people in Georgetown would see DEFREITAS and the

Source with KADIR. KADIR explained that if anyone had ideas of causing DEFREITAS and the Source harm, they would now "think twice." With respect to the JFK plot, KADIR informed DEFREITAS and the Source that his associates had their own rules of engagement and wanted to minimize the killing of innocents, such as women and children. KADIR proposed conducting the operation in the early morning hours, to minimize the killing of innocent people. He said that the damage should be economic in nature. KADIR also said that the JFK video was not sufficiently detailed for operational purposes, and told them to use Google Earth software to get more detailed pictures of JFK after they returned to New York. KADIR offered to help finance their return trip and to send someone to meet them in New York. KADIR also told DEFREITAS to download the JFK video onto a thumb drive or DVD and hide it.

39. DEFREITAS then told KADIR about their desire to travel to Trinidad to present the plan to the JAM leader. DEFREITAS said that the defendant ABDEL NUR would travel with them and make the introduction. KADIR said that he (KADIR) had introduced NUR to the JAM leader and that NUR was the right person to make the introduction.

40. DEFREITAS and the Source returned to New York on or about February 28, 2007. The flight landed at JFK. United States Customs and Border Patrol ("CBP") officers conducted a

border search of DEFREITAS and his belongings. The officers found and copied, among other items, DEFREITAS's phone book containing the names and telephone number of KADIR, Individual F, Individual E and Individual A.

41. In a consensually recorded conversation later that day, DEFREITAS told the Source that customs officers at JFK had questioned and harassed him (DEFREITAS), searched his belongings and made copies of several documents, including papers with KADIR's contact information. DEFREITAS told the Source that he was extremely suspicious that the United States government knew about their plans. The Source told DEFREITAS that he (Source) had been questioned by Guyanese officers at the airport in Guyana.

42. On or about March 1, 2007, in a consensually recorded conversation, DEFREITAS told the Source that he had called KADIR to inform him about the incident at the airport, including the fact that the officers copied documents with KADIR's contact information. According to DEFREITAS, KADIR said he would get back in touch with them after conferring with his associates. On March 5, in a consensually recorded conversation, DEFREITAS again told the Source that he had contacted KADIR to tell him what had happened at the airport. Later that evening, DEFREITAS and the Source placed a consensually recorded telephone call to KADIR. The Source told KADIR that he had used the

software Google Earth and had found the "chicken farm," the code name for the JFK plot.

43. On or about March 7, 2007, in a consensually recorded telephone call, KADIR advised the Source that "the folks don't want to deal with that hatchery" because "right now it is too sensitive," an apparent reference to the CBP's search and questioning of DEFREITAS.

44. In early April 2007, in consensually recorded conversations, DEFREITAS and the Source discussed obtaining airline tickets to travel to Trinidad to meet with the JAM leader about the JFK plot. The Source arranged to get three tickets from a purported business associate. While the Source suggested that ABDEL NUR accompany them to Trinidad to make the introduction to the JAM leader, DEFREITAS told the Source that they should instead give the third ticket to KADIR, and have KADIR make the introduction to the JAM leader. On or about April 11, 2007, DEFREITAS and the Source placed a consensually recorded telephone call to KADIR. DEFREITAS informed KADIR that they had an extra ticket for their trip to Trinidad and asked whether he would travel with them. KADIR agreed.

45. On or about April 14, 2007, DEFREITAS and the Source placed another consensually recorded telephone call to KADIR. Using the coded language devised by KADIR, the Source reminded KADIR that he had previously told them that ABDEL NUR

would be able to contact "the gentleman" in Trinidad about "the chicken farm," a coded reference to the JAM leader and the JFK plot. The Source stated that they had doubts about NUR's character and reputation, and asked KADIR whether he (KADIR) would make the introduction to the "gentleman." KADIR responded, "Yeah, sure, *inshala* [God willing]. We can do that when you come down and we go there." The trip to Trinidad was scheduled for May 20 to May 24, 2007.

46. On or about May 7, 2007, DEFREITAS and the Source discussed the trip to Guyana and Trinidad and the JFK plot, including the Google Earth images of JFK. The discussion was consensually recorded. DEFREITAS also talked about asking KADIR to meet them at the airport in Guyana so that they would not encounter problems with airport security. DEFREITAS and the Source then placed a consensually recorded telephone call to KADIR. The Source told KADIR: "On the (UI) chicken farm, I downloaded the Google Earth and we've got the print of the chicken farm from the air. But the sheikh [DEFREITAS] would like to know if it is needed - if anything else - or if you are satisfied with that." KADIR responded, "No, I think that should be good." DEFREITAS reminded KADIR that they had been harassed at the airport by Guyanese officials who had questioned why they were traveling back and forth to Guyana so often. DEFREITAS asked KADIR whether he could help them get past security at the

airport. KADIR replied that he would personally meet them at the airport, adding, "We will take care of that."

47. DEFREITAS and the Source traveled to Guyana on or about May 10, 2007. KADIR met them at the airport. DEFREITAS stayed in Georgetown, and the Source traveled with KADIR to Linden. The Source stayed with KADIR's son, who lives down the street from KADIR. On or about May 11, 2007, the Source met an associate of KADIR ("Individual G").

48. DEFREITAS arrived later on May 11, 2007. KADIR told DEFREITAS and the Source that he was going to take them to meet with the JAM leader in Trinidad, and confirmed their travel dates. KADIR said that he was sending Individual G to Trinidad on May 13 to arrange the meeting with the JAM leader. He said that Individual G did not know the purpose of the meeting. Later in the day, DEFREITAS and the Source showed KADIR the JFK video and Google Earth maps of JFK. DEFREITAS identified, among other things, the fuel tank locations and air traffic control tower. DEFREITAS explained that because JFK security monitored the fuel tank locations from the tower, disabling the control tower was a key to the operation. KADIR asked many questions about the maps, including the distance between the street and the fuel tanks. DEFREITAS asked KADIR, who is an engineer by education and training, about the composition of the tanks. KADIR explained, in sum and substance, that they were probably double tanks, i.e.,

a tank within the tank. KADIR said that two explosions would be necessary to ignite the fuel inside the inner tank, and explained that fuel needs oxygen to explode.

49. On or about May 14, 2007, DEFREITAS and the Source met with NUR in Georgetown. DEFREITAS informed NUR that KADIR would be traveling with them to Trinidad to make the introduction to the JAM leader. DEFREITAS said that they would still purchase a ticket for NUR to travel to Trinidad, but that he would take a different flight scheduled to depart a few hours after their flight. NUR agreed.

50. On or about May 19, 2007, KADIR met with the Source. The meeting was consensually recorded. KADIR explained that he would be unable to travel to Trinidad because of a "project" that required his presence in Guyana on May 21 and 22. KADIR explained, however, that he had "called the brothers in Trinidad" and arranged for them to meet DEFREITAS and the Source at the airport, give them a place to stay and ensure their security. KADIR said that he would talk to the "brothers" about the meeting with the JAM leader. Later in the conversation, KADIR took a telephone call outside of the Source's presence, returned and informed the Source that, "The folks called from Trinidad. They said they've arranged meetings for when you go there."

51. KADIR also advised the Source how they should

handle themselves in Trinidad, including during the meeting with the JAM leader. The following conversation took place:

KADIR: Right now in Trinidad, with [the JAM leader]. Is hot, with respect to national security, and the international security. Because I think there was some problem. Some problem with the government and what not. [] has been acting up as late. And they have him under serious surveillance. Very, very strong surveillance. Even to the point of the international, because they see he has links with Mohamar Qadafi. And so the international people and the local police. Everybody is zooming in on him. So I don't know if he'll be available, because of that. But the brothers are going to try to see what can happen - if they can hook you up to meet him.

* * *

The other thing too, when you're traveling, do not walk with anything that can implicate you. Remember the copies that you had? It will be advisable not to walk with that, just in case they decide to search you in Trinidad. Because if they search you and they find that, you have to explain to them what you're doing with that. And that can always be picked up from the internet. . . Just in case they want to search, you don't want no implications. None, none, none whatsoever. So it's better to discard that. And anytime you want that, you know the web page, you go to the web page and get it directly. If you get to meet [the JAM leader], be very careful with what you tell him. The reason why is that it's the first time you're gonna meet him. And he's not going to open up to you - anything.

Source: So what are you suggesting? I'll allow Mohammed [DEFREITAS] to speak.

KADIR: Yes, let Mohammed speak.

Source: He's the oldest. And I don't know if ABDEL NUR will be able to -

KADIR: Or, ABDEL NUR is better, because he knows him. He knows him. [] They speak the same language. But for a person who [] is considered a stranger - he's meeting for the first time - to approach him with something like that, would be. . . But any introduction of that should be through ABDEL NUR. Because ABDEL NUR knows him, and he can open up something like that to him.

52. On or about May 20, 2007, DEFREITAS and the Source traveled to Trinidad. NUR traveled there as well on a different flight. As KADIR had arranged, an associate of KADIR picked up DEFREITAS and the Source at the airport and took them ^{TO} ^(OP) the residence of the defendant KAREEM IBRAHIM, also known as "Amir Kareem" ("KAREEM"), another associate of KADIR. KAREEM is a citizen of Trinidad.

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53. On or about May 22, 2007, KAREEM, DEFREITAS and the Source traveled to one of the compounds of the JAM leader where they located NUR. During a consensually recorded conversation, NUR explained that he had been at the location from the time he arrived in Trinidad on May 20. NUR told the Source and DEFREITAS that he had met with the JAM leader about the plot. According to NUR, the JAM leader suggested that NUR, DEFREITAS and the Source come back a few days later to discuss the plan in detail. The JAM leader also advised that he wanted to do some "checks" on DEFREITAS and the Source before any meeting.

54. DEFREITAS, NUR, KAREEM and the Source left the compound and, later that evening, returned to KAREEM's residence.

NUR, DEFREITAS, KAREEM and the Source then called KADIR in Guyana. During the telephone call, NUR informed KADIR that he had met with the JAM leader and presented the plan to him, and made arrangements for NUR, DEFREITAS and the Source to meet with the JAM leader later in the week. KADIR said he was pleased.

55. Late in the evening on May 23, 2007, during a consensually recorded conversation, DEFREITAS advised KAREEM about the JFK plot in detail. NUR and the Source were also present. DEFREITAS and the Source then played the JFK video and showed KAREEM the Google Earth images. As he had with KADIR, DEFREITAS informed KAREEM, in the presence of NUR and the Source, about their specific plan to explode fuel tanks at JFK and destroy the air traffic control tower. DEFREITAS further compared the attack to September 11th, explaining "even the Twin Towers can't touch it." DEFREITAS added that "this can destroy the economy of America for some time if it falls into the right hands."

56. During that conversation, which was consensually recorded, DEFREITAS explained that they intended to present the plan to the JAM leader, but had concerns about their safety. KAREEM advised against presenting the plan to the JAM leader, and instead said that he (KAREEM) would present the plan to contacts overseas who may be interested in purchasing or funding it. KAREEM instructed DEFREITAS, NUR and the Source to leave the JFK

video and Google images with him so that, if his contacts overseas were interested, he would have the items available to show them. KAREEM stated that would keep them in a safe place in Tobago. DEFREITAS agreed.

57. On or about May 24, 2007, DEFREITAS, KAREEM and the Source called KADIR. DEFREITAS advised KADIR that KAREEM was aware of the JFK plot and was going to present it to his contacts. They asked KADIR whether any money received for the plans could be maintained in KADIR's foundation in Linden, Guyana. KADIR agreed. KAREEM, DEFREITAS, NUR and the Source devised a code system for future communications.

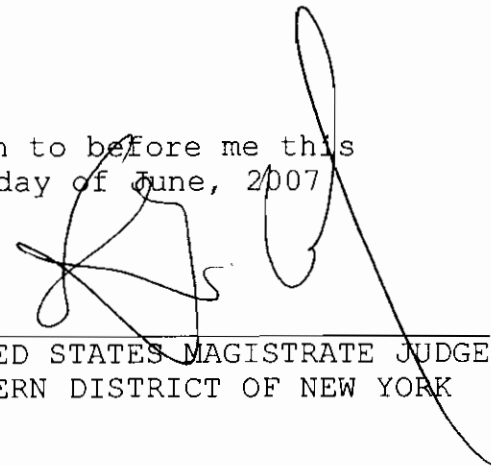
58. DEFREITAS and the Source returned to New York on or about May 26, 2007. During a consensually recorded phone call among KAREEM, DEFREITAS and the Source on or about May 27, KAREEM said that the plan was moving forward, and that he was sending one of his associates as an emissary to present the plan. He explained that the individual would travel overseas to present the plan. DEFREITAS stated that he was happy to see that the plan was moving forward.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for defendants RUSSELL DEFREITAS, also known as "Mohammed," KAREEM IBRAHIM, also known as "Amir Kareem," ABDUL KADIR and ABDEL NUR, so that they may be dealt with according to law. Because of the nature and content of the

charges alleged herein, the government requests that the complaint and arrest warrants be filed under seal until further order of this Court.


ROBERT ADDONIZIO
Detective/Investigator
Joint Terrorism Task Force

Sworn to before me this
1st day of June, 2007


UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK