

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

THOMAS E. BURNETT, SR. (P1), in his own right)
as the Father of **THOMAS E. BURNETT, JR.**,)
Deceased)

CIVIL ACTION

BEVERLY BURNETT (P2), in her own right as the)
Mother of **THOMAS E. BURNETT, JR.**,)
Deceased)

Case Number

1:02CV01616(JR)

DEENA BURNETT (P3), in her own right and as)
Representative of the **ESTATE OF THOMAS E.**)
BURNETT, JR., Deceased)

MARY MARGARET BURNETT (P4), in her own)
right as the Sister of **THOMAS E. BURNETT,**)
JR., Deceased)

MARTHA BURNETT O'BRIEN (P5), in her own)
right as the Sister of **THOMAS E. BURNETT,**)
JR., Deceased)

WILLIAM DOYLE, SR. (P6), in his own right as)
the Father of **JOSEPH M. DOYLE**, Deceased)

**THIRD AMENDED
COMPLAINT**

CAMILLE DOYLE (P7), in her own right as the)
Mother of **JOSEPH M. DOYLE**, Deceased)

JURY TRIAL DEMANDED

WILLIAM DOYLE, JR. (P8), in his own right as)
the Brother of **JOSEPH M. DOYLE**, Deceased)

DOREEN LUTTER (P9), in her own right as the)
Sister of **JOSEPH M. DOYLE**, Deceased)

DR. STEPHEN ALDERMAN (P10), in his own)
right and as Co-Representative of the **ESTATE OF**)
PETER CRAIG ALDERMAN, Deceased)

ELIZABETH ALDERMAN (P11), in her own right)
and as Co-Representative of the **ESTATE OF**)
PETER CRAIG ALDERMAN, Deceased)

JANE ALDERMAN (P12), in her own right as the)
Sister of **PETER CRAIG ALDERMAN**, Deceased)

YVONNE V. ABDOOL (P13), in her own right as)
an Injured Party)

ALFRED ACQUAVIVA (P14), in his own right as)
 the Father of **PAUL ANDREW ACQUAVIVA**,)
 Deceased)
)
JOSEPHINE ACQUAVIVA (P15), in her own right)
 as the Mother of **PAUL ANDREW ACQUAVIVA**,)
 Deceased)
)
KARA HADFIELD (P16), in her own right as the)
 Sister of **PAUL ANDREW ACQUAVIVA**,)
 Deceased)
)
JESSICA MURROW-ADAMS (P17), in her own)
 right and as Representative of the **ESTATE OF**)
STEPHEN GEORGE ADAMS, Deceased)
)
STEPHEN JEZYCKI (P18), in his own right as the)
 Father of **MARGARET ALARIO**, Deceased)
)
JAMES ALARIO (P19), in his own right and on)
 behalf of the Minor Children of **MARGARET**)
ALARIO, Deceased)
)
CATHERINE JEZYCKI (P20), in her own right as)
 the Mother of **MARGARET ALARIO**, Deceased)
)
KARIUM ALI (P21), in his own right as an Injured)
 Party)
)
JENNIFER D'AURIA (P22), in her own right and)
 as Co-Representative of the **ESTATE OF JOSEPH**)
R. ALLEN, Deceased)
)
MICHAEL J. ALLEN (P23), in his own right and)
 as Co-Representative of the **ESTATE OF JOSEPH**)
R. ALLEN, Deceased)
)
JOCELYNE AMBROISE (P24), in her own right)
 as an Injured Party)
)
PHILIPSON AZENABOR (P25), in his own right)
 as an Injured Party)
)
JOHN P. BAESZLER (P26), in his own right and as)
 Representative of the **ESTATE OF JANE ELLEN**)
BAESZLER, Deceased)
)
MARY BARBIERI (P27), in her own right as an)
 Injured Party)
)
 _____)

ARMANDO BARDALES (P28), in his own right as)
 an Injured Party)
)
GILA BARZVI (P29), in her own right and as)
 Representative of the **ESTATE OF GUY**)
BARZVI, Deceased)
)
ARIE BARZVI (P30), in his own right as the Father)
 of **GUY BARZVI**, Deceased)
)
JOHN BENEDETTO (P31), on behalf of the Minor)
 Children of **DENISE LENORE BENEDETTO**,)
 Deceased)
)
RINA RABINOWITZ (P32), in her own right as the)
 Sister of **DENISE LENORE BENEDETTO**,)
 Deceased)
)
MARIA GIORDANO (P33), in her own right as the)
 Mother of **DENISE LENORE BENEDETTO**,)
 Deceased)
)
MICHAEL GIRDANO (P34), in his own right as)
 the Brother of **DENISE LENORE BENEDETTO**,)
 Deceased)
)
ONDINA BENNETT (P35), in her own right and as)
 Representative of the **ESTATE OF BRYAN**)
CRAIG BENNETT, Deceased)
)
FRANCES BERDAN (P36), in her own right as an)
 Injured Party)
)
PRA KASH BHATT (P37), in his own right as an)
 Injured Party)
)
MILES BILCHER (P38), in his own right as the)
 Father of **BRIAN BILCHER**, Deceased)
)
IRENE BILCHER (P39), in her own right as the)
 Mother of **BRIAN BILCHER**, Deceased)
)
BORIS BELILOVSKY (P40), in his own right and)
 on behalf of the minor child of **YELENA**)
“HELEN” BELILOVSKY, Deceased)
)
EMMA TISNOVSKIY (P41), in her own right as)
 the Mother of **YELENA “HELEN”**)
BELILOVSKY, Deceased)
)
 _____)

LEONID TISNOVSKIY (P42), in his own right as)
the Father of **YELENA “HELEN”**)
BELILOVSKY, Deceased)
))
ROSTYSLAV TISNOVSKIY (P43), in his own)
right as the Brother of **YELENA “HELEN”**)
BELILOVSKY, Deceased)
))
BASMATTIE BISHUNDAT (P44), in her own)
right and as Co-Representative of the **ESTATE OF**)
KRIS ROMEO BISHUNDAT, Deceased)
))
BHOLA P. BISHUNDAT (P45), in his own right)
and as Co-Representative of the **ESTATE OF**)
KRIS ROMEO BISHUNDAT, Deceased)
))
KRYSTYNA BORYCZEWSKI (P46), in her own)
right and as Representative of the **ESTATE OF**)
MARTIN BORYCZEWSKI, Deceased)
))
MICHELE BORYCZEWSKI (P47), in her own)
right as the Sister of **MARTIN BORYCZEWSKI**,)
Deceased)
))
MICHAEL BORYCZEWSKI (P48), in his own)
right as the Father of **MARTIN BORYCZEWSKI**,)
Deceased)
))
JULIA BORYCZEWSKI (P49), in her own right as)
the Sister of **MARTIN BORYCZEWSKI**,)
Deceased)
))
NELLY BRAGINSKAYA (P50), in her own right)
and as Representative of the **ESTATE OF**)
ALEXANDER BRAKINSKY, Deceased)
))
EDUARDO E. BRUNO (P51), in his own right as)
an Injured Party)
))
ERNST H. BUCK (P52), in his own right as the)
Father of **GREGORY JOSEPH BUCK**, Deceased)
))
ERIC BUCK (P53), in his own right as the Brother)
of **GREGORY JOSEPH BUCK**, Deceased)
))
JOSEPHINE BUCK (P54), in her own right as the)
Mother of **GREGORY JOSEPH BUCK**, Deceased)
))
))
))
))
))
))

JULIO CACERES (P55), in his own right and on behalf of the Minor Child of **LILLIAN CACERES**, Deceased)
STEVEN T. CAMPBELL (P56), in his own right and as Representative of the **ESTATE OF JILL MARIE CAMPBELL**, Deceased)
JEANNE M. MAURER (P57), in her own right as the Mother of **JILL MARIE CAMPBELL**, Deceased)
LINDA MAURER (P58), in her own right as the Sister of **JILL MARIE CAMPBELL**, Deceased)
JOSEPH MAURER (P59), in his own right as the Father of **JILL MARIE CAMPBELL**, Deceased)
MARGARET CANAVAN (P60), in her own right and as Representative of the **ESTATE OF SEAN CANAVAN**, Deceased)
THOMAS CANAVAN (P61), in his own right as the Father of **SEAN CANAVAN**, Deceased)
ROSEMARY CELINE TRAYNOR (P62), in her own right as the Sister of **SEAN CANAVAN**, Deceased)
TERESA MCCAFFERY (P63), in her own right as the Sister of **SEAN CANAVAN**, Deceased)
KATHLEEN MCKEON (P64), in her own right as the Sister of **SEAN CANAVAN**, Deceased)
CIARAN CANAVAN (P65), in his own right as the Brother of **SEAN CANAVAN**, Deceased)
TERESA DIFATO (P66), in her own right as the Mother of **LISA CANNAVA**, Deceased)
ANTONIO DIFATO (P67), in his own right as the Father of **LISA CANNAVA**, Deceased)
SUZAN CAYNE (P68), in her own right as the Mother of **JASON DAVID CAYNE**, Deceased)
JORDAN CAYNE (P69), in his own right as the Father of **JASON DAVID CAYNE**, Deceased)

NAGESWARARAO CHALASANI (P70), in his)
 own right as the Father of **SWARNA**)
CHALASANI, Deceased)
)
NICHOLAS M. CHIARCHIARO, SR. (P71), in)
 his own right and as Representative of the **ESTATE**)
OF DOROTHY J. CHIARCHIARO, Deceased)
)
NICHOLAS J. CHIARCHIARO (P72), in his own)
 right as the Son of **DOROTHY J.**)
CHIARCHIARO, Deceased)
)
LISA SOKOL (P73), in her own right as the)
 Daughter of **DOROTHY J. CHIARCHIARO**,)
 Deceased)
)
LYNNE CILLO-CAPALDO (P74), in her own)
 right and as Representative of the **ESTATE OF**)
ELAINE CILLO, Deceased)
)
NUNZI C. CILLO (P75), in his own right as the)
 Father of **ELAINE CILLO**, Deceased)
)
GARY CILLO (P76), in his own right as the Brother)
 of **ELAINE CILLO**, Deceased)
)
SHARRON L. CLEMONS (P77), in her own right)
 as an Injured Party)
)
MARTIN J. COLLINS (P78), in his own right and)
 as Representative of the **ESTATE OF JOHN**)
MICHAEL COLLINS, Deceased)
)
MARTIN COLLINS (P79), in his own right as the)
 Brother of **JOHN MICHAEL COLLINS**,)
 Deceased)
)
PATRICIA AMO (P80), in her own right as the)
 Sister of **JOHN MICHAEL COLLINS**, Deceased)
)
EILEEN BYRNE (P81), in her own right as the)
 Sister of **JOHN MICHAEL COLLINS**, Deceased)
)
ANNE M. COLLINS (P82), in her own right as the)
 Sister of **JOHN MICHAEL COLLINS**, Deceased)
)
CORNELIUS P. CLANCY, III (P83), in his own)
 right as the Brother of **SUSAN CLANCY**)
CONLON, Deceased)
)
)

KEVIN S. CLANCY (P84), in his own right as the)
 Brother of **SUSAN CLANCY CONLON**, Deceased)
)
VERA CLANCY (P85), in her own right as the)
 Mother of **SUSAN CLANCY CONLON**, Deceased)
)
LAWRENCE CUBAS (P86), in his own right as the)
 Brother of **KENNETH J. CUBAS**, Deceased)
)
DOROTHY CUBAS (P87), in her own right as the)
 Mother of **KENNETH J. CUBAS**, Deceased)
)
ALFONSO CUBAS, JR. (P88), in his own right as)
 the Brother of **KENNETH J. CUBAS**, Deceased)
)
GRACE D'ESPOSITO (P89), in her own right and)
 on behalf of the Minor Child of **MICHAEL JUDE**)
D'ESPOSITO, Deceased)
)
RALPH D'ESPOSITO (P90), in his own right as)
 the Father of **MICHAEL JUDE D'ESPOSITO**,)
 Deceased)
)
SELENA DACK FORSYTH (P91), in her own)
 right as the Mother of **CALEB ARRON DACK**,)
 Deceased)
)
FRANCIS L. DANAHY, JR. (P92), in his own right)
 as the Father of **PATRICK WILLIAM DANAHY**,)
 Deceased)
)
MARY-ANNE DWYER DANAHY (P93), in her)
 own right as the Mother of **PATRICK WILLIAM**)
DANAHY, Deceased)
)
MICHAEL FRANCIS DANAHY (P94), in his own)
 right as the Brother of **PATRICK WILLIAM**)
DANAHY, Deceased)
)
MARYANNE DANAHY (P95), in her own right as)
 the Sister of **PATRICK WILLIAM DANAHY**,)
 Deceased)
)
JOHN M. DANAHY (P96), in his own right as the)
 Brother of **PATRICK WILLIAM DANAHY**,)
 Deceased)
)
KATHLEEN A. DANAHY SAMUELSON (P97),)
 in her own right as the Sister of **PATRICK**)
WILLIAM DANAHY, Deceased)
_____)

DENISE DANAHY DUFFY (P98), in her own right)
as the Sister of **PATRICK WILLIAM DANAHY**,)
Deceased)
)
AMY WATERS DAVIDSON (P99), on behalf of)
the Minor Children of **SCOTT DAVIDSON**,)
Deceased)
)
STEPHEN DAVIDSON (P100), in his own right as)
the Father of **SCOTT DAVIDSON**, Deceased)
)
CARLA DIMAGGIO (P101), in her own right as)
the Mother of **SCOTT DAVIDSON**, Deceased)
)
MICHAEL DAVIDSON (P102), in his own right as)
the Brother of **SCOTT DAVIDSON**, Deceased)
)
JOAQUIM "TIM" T. DEARAUJO (P103), in his)
own right and as Representative of the **ESTATE**)
OF DOROTHY A. DEARAUJO, Deceased)
)
MICHELE DEFAZIO (P104), in her own right and)
as Representative of the **ESTATE OF JASON**)
DEFAZIO, Deceased)
)
JAMES DEFAZIO (P105), in his own right as the)
Father of **JASON DEFAZIO**, Deceased)
)
ROSE DEFAZIO (P106), in her own right as the)
Mother of **JASON DEFAZIO**, Deceased)
)
MICHAEL DEFAZIO (P107), in his own right as)
the Brother of **JASON DEFAZIO**, Deceased)
)
GRICEL MOYER (P108), in her own right as the)
Mother of **MANUEL DEL VALLE, JR.**, Deceased)
)
ANTONIO DIFATO (P109), in his own right as the)
Father of **JOHN DIFATO**, Deceased)
)
TERESA DIFATO (P110), in her own right as the)
Mother of **JOHN DIFATO**, Deceased)
)
FRANK DOMINGUEZ (P111), in his own right as)
the Brother of **JEROME DOMINGUEZ**, Deceased)
)
DIANE EGAN (P112), in her own right and on)
behalf of the Minor Children of **MARTIN EGAN**,)
JR., Deceased)
)

COLLEEN D'AMATO (P113), in her own right as the Sister of **MARTIN EGAN, JR.**, Deceased)
MICHAEL EGAN (P114), in his own right as the Brother of **MARTIN EGAN, JR.**, Deceased)
MARK EGAN (P115), in his own right as the Brother of **MARTIN EGAN, JR.**, Deceased)
MARTIN EGAN, SR. (P116), in his own right as the Father of **MARTIN EGAN, JR.**, Deceased)
PATRICIA EGAN (P117), in her own right as the Mother of **MARTIN EGAN, JR.**, Deceased)
MARLYSE BOSLEY (P118), in her own right as the Sister of **JOSE ESPINAL**, Deceased)
SIMONE ESPOSITO (P119), in his own right as the Father of **MICHAEL ESPOSITO**, Deceased)
ROSE ESPOSITO (P120), in her own right as the Mother of **MICHAEL ESPOSITO**, Deceased)
DENISE PALAZZOTTO (P121), on behalf of the Minor Children of **MICHAEL ESPOSITO**, Deceased)
SIMONE ESPOSITO (P122), in his own right as the Brother of **MICHAEL ESPOSITO**, Deceased)
JOSEPH ESPOSITO (P123), in his own right as the Brother of **MICHAEL ESPOSITO**, Deceased)
SALVATORE ESPOSITO (P124), in his own right as the Brother of **MICHAEL ESPOSITO**, Deceased)
FRANK ESPOSITO (P125), in his own right as the Brother of **MICHAEL ESPOSITO**, Deceased)
DOROTHY ESPOSITO (P126), in her own right as the Mother of **FRANCIS ESPOSITO**, Deceased)
MICHAEL ESPOSITO (P127), in his own right as the Father of **FRANCIS ESPOSITO**, Deceased)
RICHARD ESPOSITO (P128), in his own right as the Brother of **FRANCIS ESPOSITO**, Deceased)

DOMINICK ESPOSITO (P129), in his own right as)
 the Brother of **FRANCIS ESPOSITO**, Deceased)
)
CATHERINE ESPOSITO (P130), in her own right)
 as the Sister of **FRANCIS ESPOSITO**, Deceased)
)
VINCENT ESPOSITO (P131), in his own right as)
 the Brother of **FRANCIS ESPOSITO**, Deceased)
)
CATHY L. FERSINI (P132), in her own right as the)
 Wife of **LOUIS V. FERSINI, JR.**, Deceased)
)
LEILETH FOSTER (P133), in her own right as an)
 Injured Party)
)
HAVEN A. FYFE (P134), in her own right and as)
 Representative of the **ESTATE OF KARLETON**)
D. FYFE, Deceased)
)
JOSEPH A. MICCIULLI (P135), in his own right)
 as the Father of **DEANNA GALANTE**, Deceased)
)
JOSEPH C. MICCIULLI (P136), in his own right)
 as the Brother of **DEANNA GALANTE**, Deceased)
)
MARGARET MICCIULLI (P137), in her own)
 right as the Mother of **DEANNA GALANTE**,)
 Deceased)
)
TINA MALDONADO (P138), in her own right as)
 the Sister of **DEANNA GALANTE**, Deceased)
)
JOHN T. GATTO (P139), in his own right as an)
 Injured Party)
)
ELEANOR GILLETTE (P140), in her own right)
 and as Representative of the **ESTATE OF EVAN**)
GILLETTE, Deceased)
)
SALI GJONBALAJ (P141), in his own right and as)
 Representative of the **ESTATE OF MON**)
GJONBALAJ, Deceased)
)
HERBERT GLADSTONE (P142), in his own right)
 and as Representative of the **ESTATE OF**)
DIANNE GLADSTONE, Deceased)
)
MORRIS SONNY GOLDSTEIN (P143), in his)
 own right as the Father of **MONICA**)
GOLDSTEIN, Deceased)
)

CECILIA GOLDSTEIN (P144), in her own right as)
 the Mother of **MONICA GOLDSTEIN**, Deceased)
)
ADRIENNE TRIGGS (P145), in her own right as)
 the Sister of **MONICA GOLDSTEIN**, Deceased)
)
WILLIAM GOODCHILD (P146), in his own right)
 and as Representative of the **ESTATE OF LYNN**)
CATHERINE GOODCHILD, Deceased)
)
ELLEN R. GOODCHILD (P147), in her own right)
 and as Representative of the **ESTATE OF LYNN**)
CATHERINE GOODCHILD, Deceased)
)
NEIL K. GOODCHILD (P148), in his own right as)
 the Brother of **LYNN CATHERINE**)
GOODCHILD, Deceased)
)
EDWIN H. YUEN (P149), in his own right as the)
 Husband of **CINDY YANZHU GUAN**, Deceased)
)
ANTHONY GUZZARDO (P150), in his own right)
 as the Husband of **BARBARA GUZZARDO**,)
 Deceased)
)
EILEEN A. HANNAFORD (P151), in her own)
 right, on behalf of the Minor Children, and as)
 Representative of the **ESTATE OF KEVIN**)
JAMES HANNAFORD, Deceased)
)
JAMES T. HANNAFORD (P152), in his own right)
 as the Father of **KEVIN JAMES HANNAFORD**,)
 Deceased)
)
NANCY E. HANNAFORD (P153), in her own right)
 as the Mother of **KEVIN JAMES HANNAFORD**,)
 Deceased)
)
PATRICK G. HANNAFORD (P154), in his own)
 right as the Brother of **KEVIN JAMES**)
HANNAFORD, Deceased)
)
ELIZABETH HANNAFORD SARACENO)
 (P155), in her own right as the Sister of **KEVIN**)
JAMES HANNAFORD, Deceased)
)
R. JAY HARRIS (P156), in his own right as the)
 Father of **STEWART D. HARRIS**, Deceased)
)
)

MILDRED HARRIS (P157), in her own right as the)
 Mother of **STEWART D. HARRIS**, Deceased)
GAIL HOFFMANN (P158), in her own right and as)
 Representative of the **ESTATE OF FREDERICK**)
HOFFMANN, Deceased)
GAIL HOFFMANN (P159), in her own right and as)
 Representative of the **ESTATE OF MICHELE**)
HOFFMANN, Deceased)
JANET HOLMES-ALFRED (P160), in her own)
 right as an Injured Party)
ROBIN HOHLWECK (P161), in her own right as)
 the Daughter of **THOMAS WARREN**)
HOHLWECK, JR., Deceased)
TODD W. HOHLWECK (P162), in his own right)
 as the Son of **THOMAS WARREN**)
HOHLWECK, JR., Deceased)
RANDOLPH T. HOHLWECK (P163), in his own)
 right as the Son of **THOMAS WARREN**)
HOHLWECK, JR., Deceased)
MARY HRABOWSKA (P164), in her own right as)
 an Injured Party)
JEAN HUNT (P165), in her own right as an Injured)
 Party)
WILLIAM F HUNT, JR. (P166), in his own right as)
 the Husband of **JEAN HUNT**, an Injured Party)
CANDEE J. MALTESE (P167), in her own right as)
 the Daughter of **JEAN HUNT**, an Injured Party)
MELANIE A. HUNT (P168), in her own right as the)
 Daughter of **JEAN HUNT**, an Injured Party)
BEATRIZ E. HYMEL (P169), in her own right and)
 as Representative of the **ESTATE OF ROBERT**)
JOSEPH HYMEL, Deceased)
GLORIA INGRASSIA (P170), in her own right and)
 as Representative of the **ESTATE OF**)
CHRISTOPHER NOBLE INGRASSIA,)
 Deceased)

ANTHONY A. INGRASSIA (P171), in his own
right as the Father of **CHRISTOPHER NOBLE**
INGRASSIA, Deceased

ANTHONY W. INGRASSIA (P172), in his own
right as the Brother of **CHRISTOPHER NOBLE**
INGRASSIA, Deceased

PAUL B. INGRASSIA (P173), in his own right as
the Brother of **CHRISTOPHER NOBLE**
INGRASSIA, Deceased

ELISA M. INGRASSIA (P174), in her own right as
the Sister of **CHRISTOPHER NOBLE**
INGRASSIA, Deceased

CLIFFORD JENKINS (P175), in his own right as
an Injured Party

JENNIFER E. JOSIAH (P176), in her own right
and as Representative of the **ESTATE OF JANE**
EILEEN JOSIAH, Deceased

KELLY C. JOSIAH (P177), in her own right and as
Representative of the **ESTATE OF JANE**
EILEEN JOSIAH, Deceased

NAZAM KHAN (P178), in his own right as the
Husband of **SARAH KHAN**, Deceased

SUSANNE KIKKENBORG (P179), in her own
right as an Injured Party

VIVIAN LERNER SHOEMAKER (P180), in her
own right as the Mother of **ALAN D.**
KLEINBERG, Deceased

ETHEL CHAMBERLAIN (P181), in her own right
as the Mother of **MICHELE LANZA**, Deceased

ALBERT A. CHAMBERLAIN (P182), in his own
right as the Father of **MICHELE LANZA**,
Deceased

SUSAN G. CHAMBERLAIN (P183), in her own
right as the Sister of **MICHELE LANZA**,
Deceased

CYNTHIA D. ORICCHIO (P184), in her own right

as the Sister of **MICHELE LANZA**, Deceased)
))
ALBERT G. CHAMBERLAIN (P185), in his own)
right as the Brother of **MICHELE LANZA**,)
Deceased)
))
ARNOLD LEDERMAN (P186), in his own right as)
an Injured Party)
))
EDWARD N. LEE (P187), in his own right as the)
Husband of **JUANITA LEE**, Deceased)
))
JOHNNY LEE (P188), in his own right as the)
Husband of **LORRAINE LEE**, Deceased)
))
SHERMAN LILLIANTHAL (P189), in his own)
right as the Father of **STEVEN BARRY**)
LILLIANTHAL, Deceased)
))
MARCIA LILLIANTHAL (P190), in her own right)
as the Mother of **STEVEN BARRY**)
LILLIANTHAL, Deceased)
))
MINDI COHEN (P191), in her own right as the)
Sister of **STEVEN BARRY LILLIANTHAL**,)
Deceased)
))
EUGENIA R. LLANES (P192), in her own right as)
the Mother of **GEORGE ANDREW LLANES**,)
Deceased)
))
GARY MICHAEL LOW (P193), in his own right)
and as Representative of the **ESTATE OF SARA**)
ELIZABETH LOW, Deceased)
))
REBECCA ALYSON LOW (P194), in her own)
right as the Sister of **SARA ELIZABETH LOW**,)
Deceased)
))
BOBBIE JEAN LOW (P195), in her own right as)
the Mother of **SARA ELIZABETH LOW**,)
Deceased)
))
RALPH LUZZICONE (P196), in his own right as)
the Father of **LINDA LUZZICONE**, Deceased)
))
DEBRA LUZZICONE (P197), in her own right as)
the Sister of **LINDA LUZZICONE**, Deceased)
))
RALPH LUZZICONE, JR. (P198), in his own right)

as the Brother of **LINDA LUZZICONE**, Deceased)
)
CHERYL COX (P199), in her own right as the)
 Sister of **LINDA LUZZICONE**, Deceased)
)
SHAKEH MARDIKIAN (P200), in her own right as)
 the Mother of **PETER EDWARD MARDIKIAN**,)
 Deceased)
)
ALEXANDER MARDIKIAN (P201), in his own)
 right as the Father of **PETER EDWARD**)
MARDIKIAN, Deceased)
)
DIANE MASSAROLI (P202), in her own right, on)
 behalf of the Minor Children, and as Representative)
 of the **ESTATE OF MICHAEL MASSAROLI**,)
 Deceased)
)
JOSEPHINE HOLUBAR (P203), in her own right)
 as the Mother of **MICHAEL MASSAROLI**,)
 Deceased)
)
JOANN CLEARY (P204), in her own right as the)
 Sister of **MICHAEL MASSAROLI**, Deceased)
)
KAREN MASTRANDREA (P205), in her own right)
 as the Wife of **PHILIP W. MASTRANDREA**,)
JR., Deceased)
)
RONALD F. MAY (P206), in his own right and as)
 Representative of the **ESTATE OF RENEE A.**)
MAY, Deceased)
)
NANCY A. MAY (P207), in her own right as the)
 Mother of **RENEE A. MAY**, Deceased)
)
JEFFREY M. MAY (P208), in his own right as the)
 Brother of **RENEE A. MAY**, Deceased)
)
KENNETH MAY (P209), in his own right as the)
 Brother of **RENEE A. MAY**, Deceased)
)
DAVID SPIVOCK, JR. (P210), on behalf of the)
 Unborn Child of **RENEE A. MAY**, Deceased)
)
DEBRA MENICH (P211), in her own right and as)
 Representative of the **ESTATE OF KEVIN**)
MICHAEL MCCARTHY, Deceased)
)
MARGARET MCDONNELL (P212), in her own)

right and on behalf of the Minor Children of)
BRIAN MCDONNELL, Deceased)
IVY M. MORENO (P213), in her own right and as)
Representative of the **ESTATE OF YVETTE**)
NICOLE MILLER, Deceased)
))
MAUREEN MITCHELL (P214), in her own right)
and as Representative of the **ESTATE OF PAUL**)
T. MITCHELL, Deceased)
))
CHRISTINE MITCHELL (P215), in her own right)
as the Daughter of **PAUL T. MITCHELL**,)
Deceased)
))
JENNIFER MITCHELL (P216), in her own right)
as the Daughter of **PAUL T. MITCHELL**,)
Deceased)
))
JOYCE MIUCCIO (P217), in her own right as the)
Wife of **RICHARD MIUCCIO**, Deceased)
))
OWEN MIUCCIO (P218), in his own right as the)
Son of **RICHARD MIUCCIO**, Deceased)
))
LAURA MIUCCIO (P219), in her own right as the)
Daughter of **RICHARD MIUCCIO**, Deceased)
))
THOMAS MIUCCIO (P220), in his own right as)
the Son of **RICHARD MIUCCIO**, Deceased)
))
JOAN MOLINARO (P221), in her own right as the)
Mother of **CARL EUGENE MOLINARO**,)
Deceased)
))
EUGENE MOLINARO (P222), in his own right as)
the Father of **CARL EUGENE MOLINARO**,)
Deceased)
))
LAWRENCE MOLINARO (P223), in his own right)
as the Brother of **CARL EUGENE MOLINARO**,)
Deceased)
))
DEBRA ANN HUDSON (P224), in her own right as)
the Sister of **CARL EUGENE MOLINARO**,)
Deceased)
))
THEODORE C. MOREHOUSE (P225), in his own)
right as the Father of **LINDSAY S.**)
MOREHOUSE, Deceased)
))

)

)
)
KATHLEEN S. MAYCEN (P226), in her own right)
as the Mother of **LINDSAY S. MOREHOUSE,**)
Deceased)

)
SARA M. MULLIGAN (P227), in her own right and)
as Representative of the **ESTATE OF PETER**)
JAMES MULLIGAN, Deceased)

)
JOHN G NEE (P228), in his own right as the Father)
of **LUKE G NEE,** Deceased)

)
MARY NEE REILLY (P229), in her own right as)
the Sister of **LUKE G NEE,** Deceased)

)
PATRICIA B. NEE O'KEEFE (P230), in her own)
right as the Sister of **LUKE G NEE,** Deceased)

)
FOOK SAM NGOOI (P231), in his own right as an)
Injured Party)

)
EDWARD O'HARE (P232), in his own right as an)
Injured Party)

)
VINCENT A. OGNIBENE (P233), in his own right)
and as Co-Representative of the **ESTATE OF**)
PHILIP PAUL OGNIBENE, Deceased)

)
ANTOINETTE D. OGNIBENE (P234), in her own)
right and as Co-Representative of the **ESTATE OF**)
PHILIP PAUL OGNIBENE, Deceased)

)
PATRICIA OLSON (P235), in her own right and on)
behalf of the Minor Children of **STEVEN J.**)
OLSON, Deceased)

)
MARIA KOUTNY (P236), in her own right and as)
Representative of the **ESTATE OF MARIE**)
PAPPALARDO, Deceased)

)
WILSTON PARRIS (P237), in his own right as an)
Injured Party)

)
BARBARA A. PATRICK (P238), in her own right)
as the Mother of **JAMES MATTHEW PATRICK,**)
Deceased)

)
JERRY PATRICK (P239), in his own right as the)
Father of **JAMES MATTHEW PATRICK,**)

Deceased)
))
KEVIN M. PATRICK (P240), in his own right as)
the Brother of **JAMES MATTHEW PATRICK,**)
Deceased)
))
ALICIA M. PATRICK (P241), in her own right as)
the Sister of **JAMES MATTHEW PATRICK,**)
Deceased)
))
KATHRYN M. PATRICK (P242), in her own right)
as the Sister of **JAMES MATTHEW PATRICK,**)
Deceased)
))
MICHAEL PATTI (P243), in his own right and as)
Co-Representative of the **ESTATE OF CIRA**)
MARIE PATTI, Deceased)
))
FRANCES PATTI (P244), in her own right and as)
Co-Representative of the **ESTATE OF CIRA**)
MARIE PATTI, Deceased)
))
JULIANN PATTI-ANDOLPHO (P245), in her own)
right as the Sister of **CIRA MARIE PATTI,**)
Deceased)
))
MICHAEL PATTI, JR. (P246), in his own right as)
the Brother of **CIRA MARIE PATTI,** Deceased)
))
RICHARD PATTI (P247), in his own right as the)
Brother of **CIRA MARIE PATTI,** Deceased)
))
PAUL PESCE (P248), in his own right and as Co-)
Representative of the **ESTATE OF DANNY**)
PESCE, Deceased)
))
CHIARA PESCE (P249), in her own right and as)
Co-Representative of the **ESTATE OF DANNY**)
PESCE, Deceased)
))
FRANK PESCE (P250), in his own right as the)
Brother of **DANNY PESCE,** Deceased)
))
ANGELA FRUNZI (P251), in her own right as the)
Sister of **DANNY PESCE,** Deceased)
))
NICOLE PETROCELLI (P252), in her own right)
and as Representative of **MARK JAMES**)
PETROCELLI, Deceased)
))

)

)
)
ALBERT P. PETROCELLI (P253), in his own
right as the Father of **MARK JAMES**
PETROCELLI, Deceased)
)
ALBERT P. PETROCELLI, JR. (P254), in his
own right as the Brother of **MARK JAMES**
PETROCELLI, Deceased)
)
VIRGINIA PETROCELLI (P255), in her own right
as the Mother of **MARK JAMES PETROCELLI**,)
Deceased)
)
SUSAN L. PICARRO (P256), in her own right and
as Representative of the **ESTATE OF LUDWIG**
JOHN PICARRO, Deceased)
)
CATHERINE POWELL (P257), in her own right
and as Representative of the **ESTATE OF SCOTT**
POWELL, Deceased)
)
BAMBANG PRIATNO (P258), in his own right as
an Injured Party)
)
EVERETT PROCTOR, JR. (P259), in his own
right and as Representative of the **ESTATE OF**
EVERETT M. PROCTOR, III, Deceased)
)
MARY E. GRIFFIN (P260), in her own right as the
Sister of **EVERETT M. PROCTOR, III**, Deceased)
)
CATHERINE B. PROCTOR (P261), in her own
right as the Mother of **EVERETT M. PROCTOR**,)
III, Deceased)
)
DONALD H. PROGEN (P262), in his own right and
as Representative of the **ESTATE OF CARRIE**
BETH PROGEN, Deceased)
)
KATHLEEN A. PROGEN (P263), in her own right
as the Mother of **CARRIE BETH PROGEN**,)
Deceased)
)
MATTHEW ERIC PROGEN (P264), in his own
right as the Brother of **CARRIE BETH PROGEN**,)
Deceased)
)
KEVIN PUMA (P265), in his own right and on
behalf of the Minor Children of **PATRICIA ANN**)

PUMA, Deceased)
)
ELEANOR WILSON (P266), in her own right as)
 the Mother of **PATRICIA ANN PUMA, Deceased**)
)
WILLIAM WILSON (P267), in his own right as the)
 Father of **PATRICIA ANN PUMA, Deceased**)
)
ANTOINETTE NICHOLASI (P268), in her own)
 right as the Sister of **PATRICIA ANN PUMA,**)
Deceased)
)
ROBERT WILSON (P269), in his own right as the)
 Brother of **PATRICIA ANN PUMA, Deceased**)
)
PATRICK J. QUIGLEY, JR. (P270), in his own)
 right as the Father of **PATRICK J QUIGLEY, IV,**)
Deceased)
)
MI JA QUIGLEY (P271), in her own right as the)
 Mother of **PATRICK J QUIGLEY, IV, Deceased**)
)
JOHN QUIGLEY (P272), in his own right as the)
 Brother of **PATRICK J QUIGLEY, IV, Deceased**)
)
MAUREEN A. RAUB (P273), in her own right, on)
 behalf of the Minor Children, and as Representative)
 of the **ESTATE OF WILLIAM R. RAUB,**)
Deceased)
)
LISA REINA (P274), in her own right and on behalf)
 of the Minor Child of **JOSEPH REINA, JR.,**)
Deceased)
)
ROSEMARIE REINA (P275), in her own right as)
 the Mother of **JOSEPH REINA, JR., Deceased**)
)
JOSEPH REINA, SR. (P276), in his own right as)
 the Father of **JOSEPH REINA, JR., Deceased**)
)
CHARLES RENDA (P277), in his own right and on)
 behalf of the minor child of **KAREN C. RENDA,**)
Deceased)
)
DANIEL RENDA (P278), in his own right as the)
 Son of **KAREN C. RENDA, Deceased**)
)
CHRISTINA RESTA (P279), in her own right and)
 as Representative of the **ESTATE OF JOHN**)
RESTA, Deceased)
)

)
)
BERNARD RESTA (P280), in his own right as the)
 Father of **JOHN RESTA**, Deceased)
)
MICHAEL RESTA (P281), in his own right as the)
 Brother of **JOHN RESTA**, Deceased)
)
THOMAS RESTA (P282), in his own right as the)
 Brother of **JOHN RESTA**, Deceased)
)
DAWN ANGRISANI (P283), in her own right as the)
 Sister of **JOHN RESTA**, Deceased)
)
CHRISTINE MAZZEO (P284), in her own right as)
 the Sister of **JOHN RESTA**, Deceased)
)
NILSA M. RIVERA (P285), in her own right and as)
 Representative of the **ESTATE OF ISAIAS**)
RIVERA, Deceased)
)
MOISES RIVERA (P286), in his own right as the)
 Brother of **ISAIAS RIVERA**, Deceased)
)
CARMEN RIVERA (P287), in her own right as the)
 Sister of **ISAIAS RIVERA**, Deceased)
)
GLORIA GONZALEZ (P288), in her own right as)
 the Sister of **ISAIAS RIVERA**, Deceased)
)
ADRIAN ISAAC RIVERA (P289), in his own right)
 as the Son of **ISAIAS RIVERA**, Deceased)
)
JOSUE RIVERA TRUJILLO (P290), in his own)
 right as the Brother of **ISAIAS RIVERA**, Deceased)
)
NELSON ROCHA (P291), in his own right as an)
 Injured Party)
)
JOHN R. ROGERS (P292), in his own right as an)
 Injured Party)
)
JULIO ROIG, JR. (P293), in his own right as an)
 Injured Party)
)
TERESA ROIG (P294), in her own right as the Wife)
 of and on behalf of the Minor Children of **JULIO**)
ROIG, JR., an Injured Party)
)
ARNOLD ROMA (P295), in his own right and as)

Representative of the **ESTATE OF KEITH**)
ROMA, Deceased)
BEVERLY ECKERT (P296), in her own right and)
 as Representative of the **ESTATE OF SEAN**)
ROONEY, Deceased)
)
CHRISTOPHER ROSSOMANDO (P297), in his)
 own right as the Brother of **NICHOLAS P.**)
ROSSOMANDO, Deceased)
)
ALEXANDER WILLIAM ROWE (P298), in his)
 own right as the Father of **NICHOLAS CHARLES**)
ALEXANDER ROWE, Deceased)
)
EDWARD RUSSIN (P299), in his own right as the)
 Father of **STEVEN HARRIS RUSSIN, Deceased**)
)
GLORIA RUSSIN (P300), in her own right as the)
 Mother of **STEVEN HARRIS RUSSIN, Deceased**)
)
BARRY RUSSIN (P301), in his own right as the)
 Brother of **STEVEN HARRIS RUSSIN, Deceased**)
)
JEAN MARC SAADA (P302), in his own right as)
 the Father of **THIERRY SAADA, Deceased**)
)
MARTINE SAADA (P303), in her own right as the)
 Mother of **THIERRY SAADA, Deceased**)
)
RUDY SAADA (P304), in his own right as the)
 Brother of **THIERRY SAADA, Deceased**)
)
ANTHONY SAADA (P305), in his own right as the)
 Brother of **THIERRY SAADA, Deceased**)
)
CINDY SAADA (P306), in her own right as the)
 Sister of **THIERRY SAADA, Deceased**)
)
ROHY SAADA (P307), in his own right as the)
 Brother of **THIERRY SAADA, Deceased**)
)
GARY SAADA (P308), in his own right as the)
 Brother of **THIERRY SAADA, Deceased**)
)
EUGENIA BOGADO (P309), in her own right as)
 the Mother of **CARLOS A. SAMANIEGO,**)
 Deceased)
)
ALEXANDER SANTORA (P310), in his own right)
 as the Father of **CHRISTOPHER A. SANTORA,**)

Deceased)
)
MAUREEN SANTORA (P311), in her own right as)
 the Mother of **CHRISTOPHER A. SANTORA,**)
 Deceased)
)
LOREEN SELLITTO (P312), in her own right and)
 as Representative of the **ESTATE OF MATTHEW**)
CARMEN SELLITTO, Deceased)
)
MATT SELLITTO (P313), in his own right as the)
 Father of **MATTHEW CARMEN SELLITTO,**)
 Deceased)
)
JONATHAN SELLITTO (P314), in his own right)
 as the Brother of **MATTHEW CARMEN**)
SELLITTO, Deceased)
)
FRANCES RUTH SELWYN (P315), in her own)
 right and as Representative of the **ESTATE OF**)
HOWARD SELWYN, Deceased)
)
BARBARA SERNA (P316), in her own right as an)
 Injured Party)
)
BRUCE E. SERVA (P317), in his own right and as)
 Representative of the **ESTATE OF MARION**)
(MARY) H. SERVA, Deceased)
)
IRENE SESSA (P318), in her own right and as)
 Representative of the **ESTATE OF ADELE**)
SESSA, Deceased)
)
ALBERICO SESSA (P319), in his own right as the)
 Brother of **ADELE SESSA,** Deceased)
)
ELENA SANDBERG (P320), in her own right as)
 the Sister of **ADELE SESSA,** Deceased)
)
CHRISTINE PATTERSON (P321), in her own)
 right as the Sister of **ADELE SESSA,** Deceased)
)
DANIEL J. SHEEHAN (P322), in his own right and)
 as Representative of the **ESTATE OF LINDA**)
JUNE SHEEHAN, Deceased)
)
ROBERT D. SHEEHAN (P323), in his own right as)
 the Brother of **LINDA JUNE SHEEHAN,**)
 Deceased)
)
 _____)

SHELLEY SIMON (P324), in her own right as the)
Wife of **PAUL SIMON**, Deceased)
EDITH SPARACIO (P325), in her own right as the)
Mother of **THOMAS SPARACIO**, Deceased)
)
DOREEN LANZA (P326), in her own right as the)
Sister of **THOMAS SPARACIO**, Deceased)
)
EDWARD SPARACIO (P327), in his own right as)
the Brother of **THOMAS SPARACIO**, Deceased)
)
DEBRA KLEMOWITZ (P328), in her own right as)
the Sister of **THOMAS SPARACIO**, Deceased)
)
JACK SPARACIO (P329), in his own right as the)
Brother of **THOMAS SPARACIO**, Deceased)
)
PATRICIA WELLINGTON (P330), in her own)
right as the Wife of **JOHN ANTHONY**
SPATARO, Deceased)
)
IRENE SPINA (P331), in her own right as the)
Mother of **LISA L. SPINA-TREROTOLA**,
Deceased)
)
MARIO SPINA (P332), in his own right as the)
Father of **LISA L. SPINA-TREROTOLA**,
Deceased)
)
PAUL M. SPINA (P333), in his own right as the)
Brother of **LISA L. SPINA-TREROTOLA**,
Deceased)
)
ROSEANNA STABILE (P334), in her own right as)
the Wife of **MICHAEL F. STABILE**, Deceased)
)
LAUREN STABILE (P335), in her own right as the)
Daughter of **MICHAEL F. STABILE**, Deceased)
)
ROBERT STABILE (P336), in his own right as the)
Son of **MICHAEL F. STABILE**, Deceased)
)
MICHELE STABILE (P337), in her own right as)
the Daughter of **MICHAEL F. STABILE**,
Deceased)
)
SANDRA N. STRAUB (P338), in her own right and)
as Representative of the **ESTATE OF EDWARD**
W. STRAUB, Deceased)
_____)

ELEANOR NEVILLE (P339), in her own right as the Mother of **JOANN TABEEK**, Deceased)
)
JAMES SMITH (P340), in his own right as the Brother of **JOANN TABEEK**, Deceased)
)
WILLIAM SMITH (P341), in his own right as the Brother of **JOANN TABEEK**, Deceased)
)
MAUREEN PICKERING (P342), in her own right as the Sister of **JOANN TABEEK**, Deceased)
)
PATRICIA HEYNE (P343), in her own right as the Sister of **JOANN TABEEK**, Deceased)
)
MICHAEL SMITH (P344), in his own right as the Brother of **JOANN TABEEK**, Deceased)
)
BARBARA TALTY (P345), in her own right, and on behalf of the Minor Children of **PAUL TALTY**, Deceased)
)
KENNETH T. TARANTINO (P346), in his own right as the Father of **KENNETH J. TARANTINO**, Deceased)
)
THERESA TARANTINO (P347), in her own right as the Mother of **KENNETH J. TARANTINO**, Deceased)
)
VICTORIA MELONE (P348), in her own right as the Sister of **KENNETH J. TARANTINO**, Deceased)
)
DOROTHY TEMPESTA (P349), in her own right as the Mother of **ANTHONY TEMPESTA**, Deceased)
)
ROSALYN TEMPLE (P350), in her own right as the Sister of **DOROTHY TEMPLE**, Deceased)
)
BIDIAWATTIE TEWARI (P351), in his own right as an Injured Party)
)
DENISE THOMPSON (P352), in her own right as an Injured Party)
)
MARTIN TOYEN (P353), in his own right and as Representative of the **ESTATE OF AMY E. TOYEN**, Deceased)
)
_____)

)
)
KATHLEEN TRANT (P354), in her own right and)
as Representative of the **ESTATE OF DANIEL**)
PATRICK TRANT, Deceased)

)
NANCY D. TZEMIS (P355), in her own right as the)
Mother of **JENNIFER TZEMIS**, Deceased)

)
SOPHIA TZEMIS (P356), in her own right as the)
Sister of **JENNIFER TZEMIS**, Deceased)

)
NICOLE TZEMIS (P357), in her own right as the)
Sister of **JENNIFER TZEMIS**, Deceased)

)
EMMANUEL VEGA (P358), in his own right as an)
Injured Party)

)
KATHY VIGGIANO (P359), in her own right as the)
Wife of **JOSEPH VIGGIANO**, Deceased)

)
MARIE VISCIANO (P360), in her own right and as)
Representative of the **ESTATE OF JOSEPH**)
GERARD VISCIANO, Deceased)

)
JASON VISCIANO (P361), in his own right as the)
Brother of **JOSEPH GERARD VISCIANO**,)
Deceased)

)
ROBERT VISCIANO (P362), in his own right as)
the Brother of **JOSEPH GERARD VISCIANO**,)
Deceased)

)
MORTON WEINBERG (P363), in his own right)
and as Representative of the **ESTATE OF**)
MICHAEL T. WEINBERG, Deceased)

)
MARY P. WEINBERG (P364), in her own right as)
the Mother of **MICHAEL T. WEINBERG**,)
Deceased)

)
JOHN WEINBERG (P365), in his own right as the)
Brother of **MICHAEL T. WEINBERG**, Deceased)

)
PATRICIA GAMBINO (P366), in her own right as)
the Sister of **MICHAEL T. WEINBERG**,)
Deceased)

)
DONALD S. WIENER (P367), in his own right as)
the Father of **JEFFREY DAVID WIENER**,)

Deceased)
)
WILMA WIENER (P368), in her own right as the)
 Mother of **JEFFREY DAVID WIENER**, Deceased)
)
ROBIN K. WIENER, ESQ (P369), in her own right)
 as the Sister of **JEFFREY DAVID WIENER**,)
 Deceased)
)
RONALD J WILLETT (P370), in his own right and)
 as Representative of the **ESTATE OF JOHN**)
CHARLES WILLETT, Deceased)
)
LUCILLE C. WILLETT (P371), in her own right)
 as the Mother of **JOHN CHARLES WILLETT**,)
 Deceased)
)
ARNOLD WITTENSTEIN (P372), in his own right)
 and as Representative of the **ESTATE OF**)
MICHAEL ROBERT WITTENSTEIN, Deceased)
)
CARYN HINSON (P373), in her own right and as)
 Representative of the **ESTATE OF MICHAEL**)
ROBERT WITTENSTEIN, Deceased)
)
BARBARA WITTENSTEIN (P374), in her own)
 right as the Mother of **MICHAEL ROBERT**)
WITTENSTEIN, Deceased)
)
JEFFREY WITTENSTEIN (P375), in his own)
 right as the Brother of **MICHAEL ROBERT**)
WITTENSTEIN, Deceased)
)
TED YARNELL (P376), in his own right and as)
 Representative of the **ESTATE OF MATTHEW**)
DAVID YARNELL, Deceased)
)
MICHELE YARNELL (P377), in her own right as)
 the Mother of **MATTHEW DAVID YARNELL**,)
 Deceased)
)
KAH LENG YEOH (P378), in his own right as an)
 Injured Party)
)
DIANNE YOUNG (P379), in her own right as an)
 Injured Party)
)
ROSEMARIE C. MARTIE (P380), in his own right)
 as the Sister of **SALVATORE J. ZISA**, Deceased)
)

TARA BANE (P381), in her own right and as
Representative of the **ESTATE OF MICHAEL A.
BANE**, Deceased

DONALD BANE (P382), in his own right as the
Father of **MICHAEL A. BANE**, Deceased

CHRISTINA BANE-HAYES (P383), in her own
right as the Sister of **MICHAEL A. BANE**,
Deceased

GRACE KNESKI (P384), in her own right and as
Representative of the **ESTATE OF STEVEN
CAFIERO**, Deceased

JANET CALIA (P385), in her own right and as
Representative of the **ESTATE OF DOMINICK
E. CALIA**, Deceased

STEPHEN L. CARTLEDGE (P386), in his own
right as the Husband of **SANDRA WRIGHT
CARTLEDGE**, Deceased

CLARA CHIRCHIRILLO (P387), in her own right
and as Representative of the **ESTATE OF PETER
CHIRCHIRILLO**, Deceased

LIVIA CHIRCHIRILLO (P388), in her own right
as the Sister of **PETER CHIRCHIRILLO**,
Deceased

CATHERINE DEBLIECK (P389), in her own right
as the Sister of **PETER CHIRCHIRILLO**,
Deceased

WILLIAM COALE (P390), in his own right and as
Representative of the **ESTATE OF JEFFREY
ALAN COALE**, Deceased

GRACE M. PARKINSON-GODSHALK (P391),
in her own right and as Representative of the
ESTATE OF WILLIAM R. GODSHALK,
Deceased

TINA GRAZIOSO (P392), in her own right and as
Representative of the **ESTATE OF JOHN
GRAZIOSO**, Deceased

JIN LIU (P393), in her own right and as)
 Representative of the **ESTATE OF LIMING GU**,)
 Deceased)
FIONA HAVLISH (P394), in her own right and as)
 Representative of the **ESTATE OF DONALD G.**)
HAVLISH, JR., Deceased)
)
DONALD G. HAVLISH, Sr (P395), in his own)
 right as the Father of **DONALD G. HAVLISH, Jr.**,)
 Deceased)
)
WILLIAM HAVLISH (P396), in his own right as)
 the Brother of **DONALD G. HAVLISH, Jr.**,)
 Deceased)
)
SUSAN CONKLIN (P397), in her own right as the)
 Sister of **DONALD G. HAVLISH, Jr.**, Deceased)
)
THOMAS P. HEIDENBERGER (P398), in his own)
 right and as Representative of the **ESTATE OF**)
MICHELE M. HEIDENBERGER, Deceased)
)
THERESANN LOSTRANGIO (P399), in her own)
 right and as Executrix of the **ESTATE OF**)
JOSEPH LOSTRANGIO, Deceased)
)
RALPH S. MAERZ, Jr. (P400), in his own right as)
 the Father of **NOELL MAERZ**, Deceased)
)
JOANNE LOVETT (P401), in her own right and as)
 Representative of the **ESTATE OF BRIAN**)
NUNEZ, Deceased)
)
LINDA PANIK (P402), in her own right as the)
 Mother of **LT. JONAS MARTIN PANIK**,)
 Deceased)
)
MARTIN PANIK (P403), in his own right as the)
 Father of **LT. JONAS MARTIN PANIK**,)
 Deceased)
)
MARTINA LYNE-ANNA PANIK (P404), in her)
 own right as the Sister of **LT. JONAS MARTIN**)
PANIK, Deceased)
)
CHRISTINE PAPASSO (P405), in her own right)
 and as Representative of the **ESTATE OF**)
SALVATORE T. PAPASSO, Deceased)
)
PATRICIA J. PERRY (P406), in her own right and)

as Representative of the **ESTATE OF JOHN WILLIAM PERRY**, Deceased)
))
))
JUDITH REISS (P407), in her own right and as Representative of the **ESTATE OF JOSHUA SCOTT REISS**, Deceased)
))
DIANE ROMERO (P408), in her own right and as Representative of the **ESTATE OF ELVIN ROMERO**, Deceased)
))
ELLEN L. SARACINI (P409), in her own right and as Representative of the **ESTATE OF VICTOR J. SARACINI**, Deceased)
))
ANNE C. SARACINI (P410), in her own right as the Mother of **VICTOR J. SARACINI**, Deceased)
))
JOANNE M. RENZI (P411), in her own right as the Sister of **VICTOR J. SARACINI**, Deceased)
))
RUSSA STEINER (P412), in her own right and as Representative of the **ESTATE OF WILLIAM R. STEINER**, Deceased)
))
SPOUSE DOE # 1 (Additional Plaintiff “AP” 1), in her own right, on behalf of the Minor Children, and as Representative of the **ESTATE OF DECEDENT DOE # 1**, Deceased)
))
SPOUSE DOE # 2 (AP2), in her own right and as Representative of the **ESTATE OF DECEDENT DOE # 2**, Deceased)
))
SPOUSE DOE # 3 (AP3), in her own right and as the Representative of the **ESTATE OF DECEDENT DOE # 3**, Deceased)
))
SON DOE # 3 (AP4), in his own right as the Son of **DECEDENT DOE # 3**, Deceased)
))
SON DOE # 3 (AP5), in his own right as the Son of **DECEDENT DOE # 3**, Deceased)
))
SON DOE # 3 (AP6), in his own right as the Son of **DECEDENT DOE # 3**, Deceased)
))
DAUGHTER DOE # 3 (AP7), in her own right as the Daughter of **DECEDENT DOE # 3**, Deceased)

MOTHER DOE # 3 (AP8), in her own right as the
 Mother of **DECEDENT DOE # 3**, Deceased)
)
BROTHER DOE # 3 (AP9), in his own right as the
 Brother of **DECEDENT DOE # 3**, Deceased)
)
BROTHER DOE # 3 (AP10), in his own right as the
 Brother of **DECEDENT DOE # 3**, Deceased)
)
SISTER DOE # 3 (AP11), in her own right as the
 Sister of **DECEDENT DOE # 3**, Deceased)
)
SISTER DOE # 3 (AP12), in her own right as the
 Sister of **DECEDENT DOE # 3**, Deceased)
)
SISTER DOE # 3 (AP13), in her own right as the
 Sister of **DECEDENT DOE # 3**, Deceased)
)
SPOUSE DOE # 4 (AP14), in her own right and as
 Representative of the **ESTATE OF DECEDENT**
DOE # 4, Deceased)
)
SPOUSE DOE # 5 (AP15), in her own right as the
 Wife of **DECEDENT DOE # 5**, Deceased)
)
FATHER DOE # 5 (AP16), in his own right as the
 Father of **DECEDENT DOE # 5**, Deceased)
)
SISTER DOE # 5 (AP17), in her own right as the
 Sister of **DECEDENT DOE # 5**, Deceased)
)
SPOUSE DOE # 6 (AP18), in her own right and as
 Representative of the **ESTATE OF DECEDENT**
DOE # 6, Deceased)
)
SPOUSE DOE # 7 (AP19), in her own right and as
 Representative of the **ESTATE OF DECEDENT**
DOE # 7, Deceased)
)
SPOUSE DOE # 8 (AP20), in her own right and as
 Representative of the **ESTATE OF DECEDENT**
DOE # 8, Deceased)
)
MOTHER DOE # 9 (AP21), in her own right and as
 the Representative of the **ESTATE OF**
DECEDENT DOE # 9, Deceased)
)
FATHER DOE # 9 (AP22), in his own right as the
 Father of **DECEDENT DOE # 9**, Deceased)
)

)
FATHER DOE # 10 (AP23), in his own right and as)
Representative of the **ESTATE OF DECEDENT**)
DOE # 10, Deceased)
MOTHER DOE # 10 (AP24), in her own right as the)
Mother of **DECEDENT DOE # 10**, Deceased)
)
SPOUSE DOE # 11 (AP25), in her own right and as)
Representative of the **ESTATE OF DECEDENT**)
DOE # 11, Deceased)
)
FATHER DOE # 12 (AP26), in his own right and as)
Representative of the **ESTATE OF DECEDENT**)
DOE # 12, Deceased)
)
FATHER DOE # 13 (AP27), in his own right and as)
Representative of the **ESTATE OF DECEDENT**)
DOE # 13, Deceased)
)
MOTHER DOE # 13 (AP28), in her own right as the)
Mother of **DECEDENT DOE # 13**, Deceased)
)
BROTHER DOE # 13 (AP29), in his own right as)
the Brother of **DECEDENT DOE # 13**, Deceased)
)
SPOUSE DOE # 14 (AP30), in her own right and on)
behalf of the Minor Children of **DECEDENT DOE**)
14, Deceased)
)
MOTHER DOE # 15 (AP31), in her own right and)
as the Representative of the **ESTATE OF**)
DECEDENT DOE # 15, Deceased)
)
FATHER DOE # 15 (AP32), in his own right as the)
Father of **DECEDENT DOE # 15**, Deceased)
)
BROTHER DOE # 15 (AP33), in his own right as)
the Brother of **DECEDENT DOE # 15**, Deceased)
)
SISTER DOE # 16 (AP34), in her own right and as)
Representative of the **ESTATE OF DECEDENT**)
DOE # 16, Deceased)
)
SISTER DOE # 16 (AP35), in her own right as the)
Sister of **DECEDENT DOE # 16**, Deceased)
)
MOTHER DOE # 16 (AP36), in her own right as the)
Mother of **DECEDENT DOE # 16**, Deceased)
)
BROTHER DOE # 16 (AP37), in his own right as)

the Brother of **DECEDENT DOE # 16**, Deceased)
)
)
)
SPOUSE DOE # 17 (AP38), in her own right and as)
 Representative of the **ESTATE OF DECEDENT**)
DOE # 17, Deceased)
)
SON DOE # 17 (AP39), in his own right as the Son)
 of **DECEDENT DOE # 17**, Deceased)
)
JOHN DOE # 18 (AP40), in his own right as an)
 Injured Party)
)
JANE DOE # 19 (AP41), in her own right as an)
 Injured Party)
)
SPOUSE DOE # 20 (AP42), in her own right and as)
 Representative of the **ESTATE OF DECEDENT**)
DOE # 20, Deceased)
)
SPOUSE DOE # 21 (AP43), in her own right and as)
 Representative of the **ESTATE OF DECEDENT**)
DOE # 21, Deceased)
)
SPOUSE DOE # 22 (AP44), in her own right, on)
 behalf of the Minor Children, and as Representative)
 of the **ESTATE OF DECEDENT DOE # 22**,)
 Deceased)
)
JOHN DOE # 23 (AP45), in his own right as an)
 Injured Party)
)
SPOUSE DOE # 23 (AP46), in her own right as the)
 Wife of **JOHN DOE #23**, an Injured Party.)
)
SON DOE # 23 (AP47), in his own right as the Son)
 of **JOHN DOE #23**, an Injured Party.)
)
SON DOE # 23 (AP48), in his own right as the Son)
 of **JOHN DOE #23**, an Injured Party.)
)
SPOUSE DOE # 24 (AP49), in her own right and as)
 Representative of the **ESTATE OF DECEDENT**)
DOE # 24, Deceased)
)
SON DOE # 24 (AP50), in his own right as the Son)
 of **DECEDENT DOE # 24**, Deceased)
)
SON DOE # 24 (AP51), in his own right as the Son)

of **DECEDENT DOE # 24**, Deceased)
)
)
)
)
EX-SPOUSE DOE # 25 (AP52), on behalf of the)
Minor Children of **DECEDENT DOE # 25**,)
Deceased)
)
FATHER DOE # 26 (AP53), in his own right and as)
Representative of the **ESTATE OF DECEDENT**)
DOE # 26, Deceased)
)
MOTHER DOE # 26 (AP54), in her own right as the)
Mother of **DECEDENT DOE # 26**, Deceased)
)
SPOUSE DOE # 27 (AP55), in her own right and as)
Representative of the **ESTATE OF DECEDENT**)
DOE # 27, Deceased)
)
SON DOE # 27 (AP56), in his own right as the Son)
of **DECEDENT DOE # 27**, Deceased)
)
SON DOE # 27 (AP57), in his own right as the Son)
of **DECEDENT DOE # 27**, Deceased)
)
FATHER DOE # 28 (AP58), in his own right and as)
Representative of the **ESTATE OF DECEDENT**)
DOE # 28, Deceased)
)
MOTHER DOE # 28 (AP59), in her own right as the)
Mother of **DECEDENT DOE # 28**, Deceased)
)
SISTER DOE # 28 (AP60), in her own right as the)
Sister of **DECEDENT DOE # 28**, Deceased)
)
SISTER DOE # 28 (AP61), in her own right as an)
Injured Party)
)
SPOUSE DOE # 29 (AP62), in her own right and as)
Representative of the **ESTATE OF DECEDENT**)
DOE # 29, Deceased)
)
SON DOE # 29 (AP63), in his own right as the Son)
of **DECEDENT DOE # 29**, Deceased)
)
DAUGHTER DOE # 29 (AP64), in her own right as)
the Daughter of **DECEDENT DOE # 29**, Deceased)
)
SON DOE # 29 (AP65), in his own right as the Son)
of **DECEDENT DOE # 29**, Deceased)

SISTER DOE # 30 (AP66), in her own right as the
Sister of **DECEDENT DOE # 30**, Deceased)
)
MOTHER DOE # 30 (AP67), in her own right as the
Mother of **DECEDENT DOE # 30**, Deceased)
)
BROTHER DOE # 30 (AP68), in his own right as
the Brother of **DECEDENT DOE # 30**, Deceased)
)
SISTER DOE # 30 (AP69), in her own right as the
Sister of **DECEDENT DOE # 30**, Deceased)
)
SISTER DOE # 31 (AP70), in her own right and as
Representative of the **ESTATE OF DECEDENT**
DOE # 31, Deceased)
)
BROTHER DOE # 31 (AP71), in his own right as
the Brother of **DECEDENT DOE # 31**, Deceased)
)
MOTHER DOE # 31 (AP72), in her own right as the
Mother of **DECEDENT DOE # 31**, Deceased)
)
FATHER DOE # 32 (AP73), in his own right and as
Representative of the **ESTATE OF DECEDENT**
DOE # 32, Deceased)
)
MOTHER DOE # 32 (AP74), in her own right and
as Representative of the **ESTATE OF**
DECEDENT DOE # 32, Deceased)
)
SPOUSE DOE # 33 (AP75), in his own right and as
Representative of the **ESTATE OF DECEDENT**
DOE # 33, Deceased)
)
SPOUSE DOE # 34 (AP76), in her own right, on
behalf of the Minor Children, and as the
Representative of the **ESTATE OF DECEDENT**
DOE # 34, Deceased)
)
DAUGHTER DOE # 34 (AP77), in her own right as
the Daughter of **DECEDENT DOE # 34**, Deceased)
)
SISTER DOE # 35 (AP78), in her own right as the
Sister of **DECEDENT DOE # 35**, Deceased)
)
SISTER DOE # 36 (AP79), in her own right as the
Sister of **DECEDENT DOE # 36**, Deceased)
)
SISTER DOE # 37 (AP80), in her own right as the)

Sister of **DECEDENT DOE # 37**, Deceased)
)
)
)
SPOUSE DOE # 38 (AP81), in his own right and as)
Representative of the **ESTATE OF DECEDENT**)
DOE # 38, Deceased)
)
BROTHER DOE # 39 (AP82), in his own right as)
the Brother of **DECEDENT DOE # 39**, Deceased)
)
FATHER DOE # 39 (AP83), in his own right as the)
Father of **DECEDENT DOE # 39**, Deceased)
)
MOTHER DOE # 39 (AP84), in her own right as the)
Mother of **DECEDENT DOE # 39**, Deceased)
)
SISTER DOE # 39 (AP85), in her own right as the)
Sister of **DECEDENT DOE # 39**, Deceased)
)
FATHER DOE # 40 (AP86), in his own right and as)
the Representative of the **ESTATE OF**)
DECEDENT DOE # 40, Deceased)
)
SPOUSE DOE # 41 (AP87) in her own right, on)
behalf of the Minor Children, and as Representative)
of **DECEDENT DOE # 41**, Deceased)
)
SISTER DOE # 41 (AP88) in her own right as the)
Sister of **DECEDENT DOE # 41**, Deceased)
)
SISTER DOE # 41 (AP89) in her own right as the)
Sister of **DECEDENT DOE # 41**, Deceased)
)
AMENDED PLAINTIFFS)
)
ROBERT ADAMS (P413), in his own right as the)
Father of **DONALD L. ADAMS**, Deceased)
)
JEAN ADAMS (P414), in her own right as the)
Mother of **DONALD L. ADAMS**, Deceased)
)
DWIGHT D. ADAMS (P415), in his own right as)
the Brother of **DONALD L. ADAMS**, Deceased)
)
MICHAEL JEZYCKI (P416), in his own right as)
the Brother of **MARGARET ALARIO**, Deceased)
)

STEPHEN JEZYCKI, JR. (P417), in his own right)
 as the Brother of **MARGARET ALARIO,**)
 Deceased)
)
RICHARD D. ALLEN (P418), in his own right as)
 the Father of **RICHARD ALLEN,** Deceased)
)
MADELYN ALLEN (P419), in her own right as the)
 Mother of **RICHARD ALLEN,** Deceased)
)
MATTHEW ALLEN (P420), in his own right as the)
 Brother of **RICHARD ALLEN,** Deceased)
)
LUKE C. ALLEN (P421), in his own right as the)
 Brother of **RICHARD ALLEN,** Deceased)
)
LYNN ALLEN (P422), in her own right as the Sister)
 of **RICHARD ALLEN,** Deceased)
)
JUDITH M. AIKEN (P423), in her own right as the)
 Sister of **RICHARD ALLEN,** Deceased)
)
LEONOR ALVAREZ (P424), in her own right as an)
 Injured Party)
)
JOCELYNE AMBROISE (P425), in her own right)
 as an Injured Party)
)
THOMAS ARIAS (P426), in his own right as the)
 Brother of **ADAM ARIAS,** Deceased)
)
DONALD ARIAS (P427), in his own right as the)
 Brother of **ADAM ARIAS,** Deceased)
)
ANDREW ARIAS (P428), in his own right as the)
 Brother of **ADAM ARIAS,** Deceased)
)
LAUREN ARIAS LUCCHINI (P429), in her own)
 right as the Sister of **ADAM ARIAS,** Deceased)
)
LORRAINE ARIAS BELIVEAU (P430), in her)
 own right as the Sister of **ADAM ARIAS,** Deceased)
)
CYNTHIA ARNOLD (P431), in her own right as an)
 Injured Party)
)
BENJAMIN ARROYO (P432), in his own right as)
 an Injured Party)
)
ANNA M. GRANVILLE (P433), in her own right as)

the Sister of **WALTER BARAN**, Deceased)
)
)
)
KIM BARBARO (P434), in her own right, on behalf)
 of the Minor Children, and as the Representative of)
 the **ESTATE OF PAUL BARBARO**, Deceased)
)
NICHOLAS BARBARO (P435), in his own right as)
 the Father of **PAUL BARBARO**, Deceased)
)
CAROL BARBARO (P436), in her own right as the)
 Mother of **PAUL BARBARO**, Deceased)
)
THOMAS J. MEEHAN, III (P437), in his own right)
 as the Father of **COLLEEN ANN BARKOW**,)
 Deceased)
)
JO ANN MEEHAN (P438), in her own right as the)
 Mother of **COLLEEN ANN BARKOW**, Deceased)
)
DARYL JOSEPH MEEHAN (P439), in his own)
 right as the Brother of **COLLEEN ANN)
 BARKOW**, Deceased)
)
EDMUND BARRY (P440), in his own right as the)
 Husband of **DIANE BARRY**, Deceased)
)
KEVIN BARRY (P441), in his own right as the Son)
 of **DIANE BARRY**, Deceased)
)
BRIAN BARRY (P442), in his own right as the Son)
 of **DIANE BARRY**, Deceased)
)
MAUREEN BARRY (P443), in her own right as the)
 Daughter of **DIANE BARRY**, Deceased)
)
SUZANNE J. BERGER (P444), in her own right, on)
 behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF JAMES P.)
 BERGER**, Deceased)
)
ROBERT J. BERNSTEIN (P445), in his own right)
 and as the Representative of the **ESTATE OF)
 WILLIAM M. BERNSTEIN**, Deceased)
)
MURRAY BERNSTEIN (P446), in his own right as)
 the Father of **WILLIAM M. BERNSTEIN**,)
 Deceased)
)
 _____)

NORMA BERNSTEIN (P447), in her own right as)
the Mother of **WILLIAM M. BERNSTEIN**,)
Deceased)
))
DAVID M. BERNSTEIN, M.D. (P448), in his own)
right as the Brother of **WILLIAM M.**)
BERNSTEIN, Deceased)
))
JOANNE F. BETTERLY (P449), in her own right,)
on behalf of the Minor Children, and as the)
Representative of the **ESTATE OF TIMOTHY**)
BETTERLY, Deceased)
))
LILLIAN BINI (P450), in her own right as the)
Mother of **CARL BINI**, Deceased)
))
ROSEMARIE CORVINO (P451), in her own right)
as the Sister of **CARL BINI**, Deceased)
))
JOHN BONOMO (P452), in his own right and as)
the Representative of the **ESTATE OF YVONNE**)
BONOMO, Deceased)
))
SONIA BONOMO (P453), in her own right as the)
Mother of **YVONNE BONOMO**, Deceased)
))
GEORGE BONOMO (P454), in his own right as the)
Brother of **YVONNE BONOMO**, Deceased)
))
SHARON BOOKER (P455), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF SEAN**)
BOOKER, Deceased)
))
ROSE BOOKER (P456), in her own right as the)
Mother of **SEAN BOOKER**, Deceased)
))
DESIREE A. GERASIMOVICH (P457), in her)
own right as the Sister of **PAMELA J. BOYCE**,)
Deceased)
))
SUSANN BRADY (P458), as the Representative of)
the **ESTATE OF GAVIN CUSHNY**, Deceased)
))
KATHLEEN M. BUCKLEY (P459), in her own)
right, on behalf of the Minor Children, and as the)
Representative of the **ESTATE OF DENNIS**)
BUCKLEY, Deceased)
))
JOHN C. BUCKLEY (P460), in his own right as the)

Father of **DENNIS BUCKLEY**, Deceased)
)
)
KATHLEEN M. BUCKLEY (P461), in her own)
 right as the Mother of **DENNIS BUCKLEY**,)
 Deceased)
)
JANE M. SMITHWICK (P462), in her own right as)
 the Sister of **DENNIS BUCKLEY**, Deceased)
)
JAVIER BURGOS (P463), in his own right as an)
 Injured Party)
)
BERNARD J. BURNS (P464), in his own right as)
 the Father of **KEITH JAMES BURNS**, Deceased)
)
AGNES D. BURNS (P465), in her own right as the)
 Mother of **KEITH JAMES BURNS**, Deceased)
)
MICHAEL J. BURNS (P466), in his own right as)
 the Brother of **KEITH JAMES BURNS**, Deceased)
)
DIANE SHEPHERD (P467), in her own right as the)
 Sister of **KEITH JAMES BURNS**, Deceased)
)
LINDA ELLICOTT (P468), in her own right as the)
 Sister of **KEITH JAMES BURNS**, Deceased)
)
MAUREEN BURNS-DEWLAND (P469), in her)
 own right as the Sister of **KEITH JAMES BURNS**,)
 Deceased)
)
COLLEEN COOPER (P470), in her own right as)
 the Sister of **KEITH JAMES BURNS**, Deceased)
)
JOSE CALLEJAS (P471), in his own right as an)
 Injured Party)
)
JOSEPH CAMMARATA (P472), in his own right)
 and as the Co-Representative of the **ESTATE OF**)
MICHAEL F. CAMMARATA, Deceased)
)
LINDA CAMMARATA (P473), in her own right)
 and as the Co-Representative of the **ESTATE OF**)
MICHAEL F. CAMMARATA, Deceased)
)
JOSEPH CAMMARATA, JR. (P474), in his own)
 right as the Brother of **MICHAEL F.**)
CAMMARATA, Deceased)
)

KIMBERLY CAMMARATA (P475), in her own
right as the Sister of **MICHAEL F.**
CAMMARATA, Deceased
CYNTHIA J. CAMPBELL (P476), in her own
right, on behalf of the Minor Child, and as the
Representative of the **ESTATE OF DAVID OTEY**
CAMPBELL, Deceased

KAREN D. CANGIALOSI (P477), in her own
right, on behalf of the Minor Children, and as the
Representative of the **ESTATE OF STEPHEN J.**
CANGIALOSI, Deceased

THOMAS J. CANGIALOSI (P478), in his own
right as the Father of **STEPHEN J.**
CANGIALOSI, Deceased

HELEN J. CANGIALOSI (P479), in her own right
as the Mother of **STEPHEN J. CANGIALOSI**,
Deceased

THOMAS J. CANGIALOSI, JR. (P480), in his
own right as the Brother of **STEPHEN J.**
CANGIALOSI, Deceased

ELIZABETH CANGIALOSI DICKEY (P481), in
her own right as the Sister of **STEPHEN J.**
CANGIALOSI, Deceased

KATHLEEN CANGIALOSI RUE (P482), in her
own right as the Sister of **STEPHEN J.**
CANGIALOSI, Deceased

NICHOLAS CAPORICCI (P483), in his own right
as the Father of **LOUIS A. CAPORICCI**, Deceased

PATRICIA CAPORICCI (P484), in her own right
as the Mother of **LOUIS A. CAPORICCI**,
Deceased

NICHOLAS CAPORICCI (P485), in his own right
as the Brother of **LOUIS A. CAPORICCI**,
Deceased

JOSEPH CAPORICCI (P486), in his own right as
the Brother of **LOUIS A. CAPORICCI**, Deceased

FRANK CAPORICCI (P487), in his own right as
the Brother of **LOUIS A. CAPORICCI**, Deceased

LUIS CARBONELL (P488), in his own right as an Injured Party)
MARIA E. CASTILLO (P489), in her own right as an Injured Party)
JUAN CAYETANO (P490), in his own right as an Injured Party)
LAKSHMI CHALASANI (P491), in her own right as the Mother of **SWARNA CHALASANI**, Deceased)
VENKATESWANANGO CHALASANI (P492), in his own right as the Brother of **SWARNA CHALASANI**, Deceased)
SUJANA CHALASANI (P493), in her own right as the Sister of **SWARNA CHALASANI**, Deceased)
SANDHYA CHALASANI (P494), in her own right as the Sister of **SWARNA CHALASANI**, Deceased)
ALICIA LEGUILLOW (P495), in her own right and as the Representative of the **ESTATE OF NESTOR A. CINTRON**, Deceased)
CHRISTOPHER J. CINTRON (P496), in his own right as the Brother of **NESTOR A. CINTRON**, Deceased)
FRED GONZALEZ, JR. (P497), in his own right as the Brother of **NESTOR A. CINTRON**, Deceased)
RAYMOND COLBERT (P498), in his own right and as the Representative of the **ESTATE OF MICHEL P. COLBERT**, Deceased)
MARIE COLBERT (P499), in her own right as the Mother of **MICHEL P. COLBERT**, Deceased)
ANNA E. COLLINS (P500), in her own right as the Mother of **JOHN MICHAEL COLLINS**, Deceased)
LAUREN COMER (P501), in her own right as the Daughter of **RONALD E. COMER**, Deceased)

KEVIN CONNOLLY (P502), in his own right as the
 Brother of **JOHN CONNOLLY, JR.**, Deceased)
)
)
SYLVIA L. CONNORS (P503), in her own right)
 and as the Representative of the **ESTATE OF**)
KEVIN P. CONNORS, Deceased)
)
JOSE M. CONTES (P504), in his own right as an)
 Injured Party)
)
PUI YEE COPPOLA (P505), in her own right, on)
 behalf of the Minor Child, and as the Representative)
 of the **ESTATE OF GERARD J. COPPOLA**,)
 Deceased)
)
GEORGE J. COPPOLA, SR. (P506), in his own)
 right as the Father of **GERARD J. COPPOLA**,)
 Deceased)
)
CYNTHIA COPPOLA KAISER (P507), in her)
 own right as the Sister of **GERARD J. COPPOLA**,)
 Deceased)
)
CHARLES P. COSTA (P508), in his own right and)
 as the Representative of the **ESTATE OF**)
DELORES M. COSTA, Deceased)
)
LAWRENCE COSTELLO (P509), in his own right)
 as an Injured Party)
)
CATHERINE COUGHLAN (P510), in her own)
 right and as the Representative of the **ESTATE OF**)
MARTIN COUGHLIN, Deceased)
)
DENISE COUGHLAN (P511), in her own right as)
 the Daughter of **MARTIN COUGHLIN**, Deceased)
)
SINEAD COUGHLAN (P512), in her own right as)
 the Daughter of **MARTIN COUGHLIN**, Deceased)
)
AILISH COUGHLAN (P513), in her own right as)
 the Daughter of **MARTIN COUGHLIN**, Deceased)
)
ORLA BOWIE (P514), in her own right as the)
 Daughter of **MARTIN COUGHLIN**, Deceased)
)
WALTER S. CRAMER (P515), in his own right as)
 the Father of **CHRISTOPHER S. CRAMER**,)
_____)

Deceased)
)
LYNNE ELIZABETH CRAMER (P516), in her)
 own right as the Mother of **CHRISTOPHER S.**)
CRAMER, Deceased)
WALTER H. CRAMER (P517), in his own right as)
 the Brother of **CHRISTOPHER S. CRAMER**,)
 Deceased)
)
MARC S. CRAMER (P518), in his own right as the)
 Brother of **CHRISTOPHER S. CRAMER**,)
 Deceased)
)
KEITH CRAMER (P519), in his own right as the)
 Brother of **CHRISTOPHER S. CRAMER**,)
 Deceased)
)
SUSAN LYNNE KINNEY (P520), in her own right)
 as the Sister of **CHRISTOPHER S. CRAMER**,)
 Deceased)
)
WALTER H. CRAMER (P521), in his own right as)
 an Injured Party)
)
ENRIQUE CRUZ (P522), in his own right as an)
 Injured Party)
)
FERNANDO CUBA (P523), in his own right as an)
 Injured Party)
)
CARMEN CUBERO (P524), in her own right as an)
 Injured Party)
)
MAUREEN CUMMINS (P525), in her own right)
 and as the Representative of the **ESTATE OF**)
BRIAN CUMMINS, Deceased)
)
ALICE SCIUSCO (P526), in her own right as the)
 Sister of **LAURENCE CURIA**, Deceased)
)
FREDERICK E. CURRY, III (P527), in his own)
 right and as the Representative of the **ESTATE OF**)
BEVERLY L. CURRY, Deceased)
)
RAQUEL D'AMADEO (P528), in her own right)
 and on behalf of the Minor Children of **VINCENT**)
GERARD D'AMADEO, Deceased)
)
HIPOLITO D'OLEO (P529), in his own right as an)
 Injured Party)

BRIGITTE DAY (P530), in her own right and as the
 Representative of the **ESTATE OF EDWARD**
DAY, Deceased)
)
JUDITH DAY (P531), in her own right as an Injured
 Party)
)
MARIA DE OLIO-BEATO (P532), in her own
 right as an Injured Party)
)
GREGORY J. DEVERNA (P533), in his own right
 as an Injured Party)
)
CARL DI FRANCO (P534), in his own right and as
 the Co-Representative of the **ESTATE OF CARL**
A. DI FRANCO, Deceased)
)
CAROLE DI FRANCO (P535), in her own right
 and as the Co-Representative of the **ESTATE OF**
CARL A. DI FRANCO, Deceased)
)
NANCY DI FRANCO LEVY (P536), in her own
 right as the Sister of **CARL A. DI FRANCO**,
 Deceased)
)
NELSON DIAZ (P537), in his own right as an
 Injured Party)
)
PETRONILO RUIZ DIAZ (P538), in his own right
 as the Father of **OBdulio RUIZ DIAZ**, Deceased)
)
CECILIA DIAZ (P539), in her own right as the
 Mother of **OBdulio RUIZ DIAZ**, Deceased)
)
EDRICK DILLARD (P540), in his own right as the
 Son of **EDDIE DILLARD**, Deceased)
)
ADELAIDE M. DRISCOLL (P541), in her own
 right and as the Representative of the **ESTATE OF**
PATRICK JOSEPH DRISCOLL, Deceased)
)
CHRISTOPHER J. DRISCOLL (P542), in his own
 right as the Son of **PATRICK JOSEPH**
DRISCOLL, Deceased)
)
STEPHEN DRISCOLL (P543), in his own right as
 the Son of **PATRICK JOSEPH DRISCOLL**,
 Deceased)
)

PATRICK T. DRISCOLL (P544), in his own right)
as the Son of **PATRICK JOSEPH DRISCOLL**,)
Deceased)

JOHN M. DRISCOLL (P545), in his own right as)
the Brother of **PATRICK JOSEPH DRISCOLL**,)
Deceased)

PAMELA M. GOULD (P546), in her own right as)
the Sister of **PATRICK JOSEPH DRISCOLL**,)
Deceased)

JANET A. DUNSTAN (P547), in her own right, on)
behalf of the Minor Child, and as the Representative)
of the **ESTATE OF RICHARD A. DUNSTAN**,)
Deceased)

LAURA D. DUNSTAN (P548), in her own right as)
the Daughter of **RICHARD A. DUNSTAN**,)
Deceased)

CHARLES R. EVANS (P549), in his own right and)
as the Co-Representative of the **ESTATE OF ERIC**)
BRIAN EVANS, Deceased)

CORRINE J. EVANS (P550), in her own right and)
as the Co-Representative of the **ESTATE OF ERIC**)
BRIAN EVANS, Deceased)

STACEY FARRELLY (P551), in her own right, on)
behalf of the Minor Child, and as the Representative)
of the **ESTATE OF JOSEPH FARRELLY**,)
Deceased)

JOSEPH FARRELLY (P552), in his own right as)
the Father of **JOSEPH FARRELLY**, Deceased)

THERESA FARRELLY (P553), in her own right as)
the Mother of **JOSEPH FARRELLY**, Deceased)

DEVIN FARRELLY (P554), in his own right as the)
Son of **JOSEPH FARRELLY**, Deceased)

RYAN FARRELLY (P555), in his own right as the)
Son of **JOSEPH FARRELLY**, Deceased)

MICHAEL FARRELLY (P556), in his own right as)
the Brother of **JOSEPH FARRELLY**, Deceased)

PATRICK M. FARRELLY (P557), in his own right)
as the Brother of **JOSEPH FARRELLY**, Deceased)
))
DENNIS FARRELLY (P558), in his own right as)
the Brother of **JOSEPH FARRELLY**, Deceased)
DENNIS NIELSEN, SR. (P559), in his own right as)
the Father of **SHANNON FAVA**, Deceased)
))
ROSE NIELSEN (P560), in her own right as the)
Mother of **SHANNON FAVA**, Deceased)
))
FRANK FAVA (P561), in his own right and on)
behalf of the Minor Child of **SHANNON FAVA**,)
Deceased)
))
DENNIS NIELSEN, JR (P562), in his own right as)
the Brother of **SHANNON FAVA**, Deceased)
))
DELIO A. FELIZ (P563), in his own right as an)
Injured Party)
))
HERNANDO FERNANDEZ (P564), in his own)
right as an Injured Party)
))
VINCENT FERRANTI (P565), in his own right as)
an Injured Party)
))
EDWARD FINNEGAN (P566), in his own right as)
an Injured Party)
))
CHRISTINE KARAS FISHER (P567), in her own)
right and as the Representative of the **ESTATE OF**)
GERALD PAUL FISHER, Deceased)
))
JONATHAN MICHAEL FISHER (P568), in his)
own right as the Son of **GERALD PAUL FISHER**,)
Deceased)
))
SERENA FISHER DUGAN (P569), in her own)
right as the Daughter of **GERALD PAUL**)
FISHER, Deceased)
))
THERESA FOLINO-MONTUORI (P570), in her)
own right as an Injured Party)
))
TESSIE MOLINA (P571), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF**)
CHRISTOPHER HUGH FORSYTHE, Deceased)
))

)

JOHN A. FOSTER (P572), in his own right as the)
 Father of **NOEL JOHN FOSTER**, Deceased)
)
)
MARION ROSETTE FOSTER (P573), in her own)
 right as the Mother of **NOEL JOHN FOSTER**,)
 Deceased)
)
KATHERINE FUMANDO (P574), in her own right)
 and as the Representative of the **ESTATE OF**)
CLEMENT FUMANDO, Deceased)
)
MARGARET FUMANDO (P575), in her own right)
 as the Mother of **CLEMENT FUMANDO**,)
 Deceased)
)
GREGORY FUMANDO (P576), in his own right as)
 the Son of **CLEMENT FUMANDO**, Deceased)
)
STEPHEN FUMANDO (P577), in his own right as)
 the Son of **CLEMENT FUMANDO**, Deceased)
)
CARLO FUMANDO (P578), in his own right as the)
 Brother of **CLEMENT FUMANDO**, Deceased)
)
CATHERINE MAROTTE (P579), in her own right)
 as the Sister of **CLEMENT FUMANDO**, Deceased)
)
CYNTHIA FURMATO (P580), in her own right, on)
 behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF PAUL**)
FURMATO, Deceased)
)
JOSEPH FURMATO (P581), in his own right as the)
 Father of **PAUL FURMATO**, Deceased)
)
MARGARET FURMATO (P582), in her own right)
 as the Mother of **PAUL FURMATO**, Deceased)
)
MARK FURMATO (P583), in his own right as the)
 Brother of **PAUL FURMATO**, Deceased)
)
JOSEPH FURMATO (P584), in his own right as the)
 Brother of **PAUL FURMATO**, Deceased)
)
JILL KEOUGH (P585), in her own right as the)
 Sister of **PAUL FURMATO**, Deceased)
)
CAROL DEBENEDICTIS (P586), in her own right)

as the Sister of **PAUL FURMATO**, Deceased)
)
ANTHONY GALANTE (P587), in his own right)
 and as the Representative of the **ESTATE OF**)
DEANNA MICCIULLI GALANTE, Deceased)
APRIL D. GALLOP (P588), in her own right as an)
 Injured Party, and on behalf of her Minor Child, also)
 an Injured Party)
)
MARIA REGINA MERWIN (P589), in her own)
 right as the Sister of **RONALD L. GAMBOA**,)
 Deceased)
)
PAUL E. GEIDEL (P590), in his own right as the)
 Father of **GARY PAUL GEIDEL**, Deceased)
)
PATRICIA M. GEIDEL (P591), in her own right as)
 the Mother of **GARY PAUL GEIDEL**, Deceased)
)
RALPH W. GEIDEL, SR. (P592), in his own right)
 as the Brother of **GARY PAUL GEIDEL**,)
 Deceased)
)
MICHAEL GEIDEL (P593), in his own right as the)
 Brother of **GARY PAUL GEIDEL**, Deceased)
)
CHRISTINE A. NORRIS (P594), in her own right)
 as the Sister of **GARY PAUL GEIDEL**, Deceased)
)
STEPHAN J. GERHARDT (P595), in his own right)
 as the Brother of **RALPH GERHARDT**, Deceased)
)
SUSAN GIBERSON (P596), in her own right and on)
 behalf of the Minor Children of **JAMES**)
GIBERSON, Deceased)
)
MARTIN GIOVINAZZO, SR. (P597), in his own)
 right as the Father of **MARTIN GIOVINAZZO**,)
 Deceased)
)
DOMENICA GIOVINAZZO (P598), in her own)
 right as the Mother of **MARTIN GIOVINAZZO**,)
 Deceased)
)
DOROTHY GIOVINAZZO (P599), in her own)
 right and on behalf of the Minor Children of)
MARTIN GIOVINAZZO, Deceased)
)
ROSE MAHONEY (P600), in her own right as the)
 Sister of **MARTIN GIOVINAZZO**, Deceased)

CONCETTA BONNER (P601), in her own right as the Sister of **MARTIN GIOVINAZZO**, Deceased)
)
)
ANGELA QUINN (P602), in her own right as the Sister of **MARTIN GIOVINAZZO**, Deceased)
)
)
BENJAMIN ALEXANDER GLASCOE (P603), in his own right and as the Representative of the **ESTATE OF KEITH ALEXANDER GLASCOE**, Deceased)
)
)
GLORIA GLASCOE (P604), in her own right as the Mother of **KEITH ALEXANDER GLASCOE**, Deceased)
)
)
VERONICA SQUEF (P605), in her own right as the Domestic Partner and on behalf of the Minor Children of **KEITH ALEXANDER GLASCOE**, Deceased)
)
)
GERALD GOLDBERG (P606), in his own right as the Father of **BRIAN F. GOLDBERG**, Deceased)
)
)
MARILYN GOLDBERG (P607), in her own right as the Mother of **BRIAN F. GOLDBERG**, Deceased)
)
)
FAUSTO A. GOMEZ (P608), in his own right as an Injured Party)
)
)
RUBEN GORDILLO (P609), in his own right as an Injured Party)
)
)
TERESA GRIMNER (P610), in her own right as the Mother of **DAVID JOSEPH GRIMNER**, Deceased)
)
)
CHARLES G. GRIMNER (P611), in his own right as the Brother of **DAVID JOSEPH GRIMNER**, Deceased)
)
)
VIRGINIA KWIATKOSKI (P612), in her own right as the Sister of **DAVID JOSEPH GRIMNER**, Deceased)
)
)
MARY ANN PETERS (P613), in her own right as the Sister of **DAVID JOSEPH GRIMNER**, Deceased)

ANGEL GUZMAN (P614), in his own right as an Injured Party

ANTHONY C. GUZZARDO (P615), in his own right as the Son of **BARBARA GUZZARDO**, Deceased

GERALDINE HALDERMAN (P616), in her own right and as the Representative of the **ESTATE OF DAVID HALDERMAN**, Deceased

MARIANNE ANGELO (P617), in her own right as the Sister of **DAVID HALDERMAN**, Deceased

ROBERT HALL (P618), in his own right as an Injured Party

JERALDINE HALLIGAN (P619), in her own right and as the Representative of the **ESTATE OF ROBERT J. HALLIGAN**, Deceased

TRAVOR HALLIGAN (P620), in his own right as the Son of **ROBERT J. HALLIGAN**, Deceased

EMMA LOUISE ARRO (P621), in her own right as the Daughter of **ROBERT J. HALLIGAN**, Deceased

WALTER E. HAMILTON (P622), in his own right as the Son of **FELICIA HAMILTON**, Deceased

WILLIAM HANKINS (P623), in his own right as an Injured Party

ANTHONY K. HANSON (P624), in his own right as an Injured Party

COLLEEN HARDACRE (P625), in her own right as the Daughter of **GERALD HARDACRE**, Deceased

NORMA HAYNES (P626), in her own right as an Injured Party

GEORGE HENRIQUE (P627), in his own right and as the Representative of the **ESTATE OF MICHELLE MARIE HENRIQUE**, Deceased

PATRICIA A. HENRIQUE (P628), in her own
right as the Mother of **MICHELLE MARIE**
HENRIQUE, Deceased

PAUL R. HENRIQUE (P629), in his own right as
the Brother of **MICHELLE MARIE HENRIQUE**,
Deceased

MICHAEL HENRIQUE (P630), in his own right as
the Brother of **MICHELLE MARIE HENRIQUE**,
Deceased

CHRISTINA HENRIQUE (P631), in her own right
as the Sister of **MICHELLE MARIE**
HENRIQUE, Deceased

MARAGRET MCCRANE (P632), in her own right
and as the Representative of the **ESTATE OF**
MARY HERENCIA, Deceased

JOSEPH HERENCIA (P633), in his own right as
the Son of **MARY HERENCIA**, Deceased

JULIO HERENCIA (P634), in his own right as the
Son of **MARY HERENCIA**, Deceased

KEVIN CARR (P635), in his own right as the
Brother of **MARY HERENCIA**, Deceased

PETER CARR (P636), in his own right as the
Brother of **MARY HERENCIA**, Deceased

ESLYN J. HERNANDEZ (P637), in his own right,
on behalf of the Minor Children, and as the
Representative of the **ESTATE OF CLARIBEL**
HERNANDEZ, Deceased

EULOGIA HERNANDEZ (P638), in her own right,
on behalf of the Minor Child, and as the
Representative of the **ESTATE OF NORBERTO**
HERNANDEZ, Deceased

JACQUELINE HERNANDEZ (P639), in her own
right as the Daughter of **NORBERTO**
HERNANDEZ, Deceased

CATHERINE HERNANDEZ (P640), in her own
right as the Daughter of **NORBERTO**

HERNANDEZ, Deceased)
)
THOMAS HICKEY (P641), in his own right as an)
 Injured Party)
)
JOHN DOUGLAS HIGLEY (P642), in his own)
 right and on behalf of the Minor Sibling of)
ROBERT DALE WARREN HIGLEY, II,)
 Deceased)
)
LISA ANN PRESTON (P643), in her own right as)
 the Sister of **ROBERT WAYNE HOBSON, III**,)
 Deceased)
)
VIVIAN BYAS (P644), in her own right, on behalf)
 of the Minor Child, and as the Representative of the)
ESTATE OF ELIZABETH HOLMES, Deceased)
)
DORIS HOLMES (P645), in her own right as the)
 Sister of **ELIZABETH HOLMES**, Deceased)
)
RALPH L. HOWELL (P646), in his own right as)
 the Father of **STEPHEN L. HOWELL**, Deceased)
)
JENNIFER WOODWARD HUNT (P647), in her)
 own right, on behalf of the Minor Child, and as the)
 Representative of the **ESTATE OF WILLIAM**)
HUNT, Deceased)
)
JOSEPH IANELLI (P648), in his own right and as)
 the Representative of the **ESTATE OF JOSEPH A.**)
IANELLI, Deceased)
)
BARBARA IANELLI (P649), in her own right as)
 the Mother of **JOSEPH A. IANELLI**, Deceased)
)
MONICA IKEN (P650), in her own right and as)
 Representative of the **ESTATE OF MICHAEL**)
PATRICK IKEN, Deceased)
)
GERARD IKEN (P651), in his own right as the)
 Brother of **MICHAEL PATRICK IKEN**,)
 Deceased)
)
ANNE HABEEB (P652), in her own right as the)
 Sister of **MICHAEL PATRICK IKEN**, Deceased)
)
ARAM P. JARRET, JR. (P653), in his own right)
 and as the Co-Representative of the **ESTATE OF**)

AMY NICOLE JARRET, Deceased)
)
MARILYN R. TRUDEAU (P654), in her own right)
 and as the Co-Representative of the **ESTATE OF**)
AMY NICOLE JARRET, Deceased)
)
MARC DOUGLAS JARRET (P655), in his own)
 right as the Brother of **AMY NICOLE JARRET**,)
 Deceased)
)
MATTHEW R. JARRET (P656), in his own right)
 as the Brother of **AMY NICOLE JARRET**,)
 Deceased)
)
ARAM P. JARRET, III (P657), in his own right as)
 the Brother of **AMY NICOLE JARRET**, Deceased)
)
ALICIA N. CURRAN (P658), in her own right as)
 the Sister of **AMY NICOLE JARRET**, Deceased)
)
LUIS B. JIMENEZ (P659), in his own right as an)
 Injured Party)
)
YSIDRO JIMENEZ (P660), in his own right as an)
 Injured Party)
)
JOYCE L. JOHNSON (P661), in her own right, on)
 behalf of the Minor Child, and as the Representative)
 of the **ESTATE OF DENNIS M. JOHNSON**,)
 Deceased)
)
FITZ-HARRY ALEXANDER JOHNSON (P662),)
 in his own right as an Injured Party)
)
SEONG SOON KANG (P663), in his own right as)
 the Father of **JOON KOO KANG**, Deceased)
)
PIL SOON KANG (P664), in her own right as the)
 Mother of **JOON KOO KANG**, Deceased)
)
JANET KANG (P665), in her own right as the Sister)
 of **JOON KOO KANG**, Deceased)
)
REBECCA HOANG (P666), in her own right as the)
 Sister of **JOON KOO KANG**, Deceased)
)
JAMIE KANG (P667), in her own right as the Sister)
 of **JOON KOO KANG**, Deceased)
)
DENISE K. KEASLER (P668), in her own right and)

as the Representative of the **ESTATE OF KAROL ANN KEASLER**, Deceased)
)
ALICE B. KELLY (P669), in her own right as the)
 Mother of **JOSEPH ANTHONY KELLY**,)
 Deceased)
CAROLYN KELLY (P670), in her own right as the)
 Wife of **RICHARD J. KELLY, JR.**, Deceased)
)
NANCY KNOX (P671), in her own right and as the)
 Representative of the **ESTATE OF THOMAS P.)
 KNOX**, Deceased)
)
PATRICIA B. KNOX (P672), in her own right as)
 the Mother of **THOMAS P. KNOX**, Deceased)
)
JAMES KNOX (P673), in her own right as the)
 Brother of **THOMAS P. KNOX**, Deceased)
)
DENIS KNOX (P674), in her own right as the)
 Brother of **THOMAS P. KNOX**, Deceased)
)
MARY ELLEN KNOX (P675), in her own right as)
 the Sister of **THOMAS P. KNOX**, Deceased)
)
PATRICIA B. LALLEY (P676), in her own right as)
 the Sister of **THOMAS P. KNOX**, Deceased)
)
KATHLEEN DOOLAN (P677), in her own right as)
 the Sister of **THOMAS P. KNOX**, Deceased)
)
ROBERT KOBUS (P678), in his own right and as)
 the Representative of the **ESTATE OF DEBORAH)
 KOBUS**, Deceased)
)
LEOKADIA KOBUS (P679), in her own right as the)
 Mother of **DEBORAH KOBUS**, Deceased)
)
FELIX KSIDO (P680), in his own right, on behalf of)
 the Minor Child, and as the Representative of the)
ESTATE OF LYUDMILA KSIDO, Deceased)
)
RICHARD L. LANE (P681), in his own right and as)
 the Representative of the **ESTATE OF ROBERT)
 T. LANE**, Deceased)
)
JANET L. LANE (P682), in her own right as the)
 Mother of **ROBERT T. LANE**, Deceased)
)
JASON M. LANE (P683), in his own right as the)

Brother of **ROBERT T. LANE**, Deceased)
)
SUZANNE R. STEVENSON (P684), in her own)
 right as the Sister of **ROBERT T. LANE**, Deceased)
)
DONNA MARSH O'CONNOR (P685), in her own)
 right and on behalf of the Minor Children of)
VANESSA LANGER, Deceased)
)
DELORES LAVERDE (P686), in her own right, on)
 behalf of the Minor Child, and as the Representative)
 of the **ESTATE OF JEANNINE LAVERDE**,)
 Deceased)
)
SUZANNE LAWRENCE (P687), in her own right,)
 on behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF ROBERT A.**)
LAWRENCE, JR., Deceased)
)
ROBERT A. LAWRENCE (P688), in his own right)
 as the Father of **ROBERT A. LAWRENCE, JR.**,)
 Deceased)
)
EILEEN LAWRENCE (P689), in her own right as)
 the Mother of **ROBERT A. LAWRENCE, JR.**,)
 Deceased)
)
ELIZABETH ANDERSON (P690), in her own right)
 as the Sister of **ROBERT A. LAWRENCE, JR.**,)
 Deceased)
)
ARTHUR LEAHY (P691), in his own right as the)
 Brother of **JAMES P. LEAHY**, Deceased)
)
ANN LEAVY (P692), in her own right and as the)
 Representative of the **ESTATE OF NEIL J.**)
LEAVY, Deceased)
)
JOHN LEAVY (P693), in his own right as the)
 Father of **NEIL J. LEAVY**, Deceased)
)
MARK LEAVY (P694), in his own right as the)
 Brother of **NEIL J. LEAVY**, Deceased)
)
GENEVA JOHNSON (P695), in her own right as)
 the Mother of **JUANITA LEE**, Deceased)
)
NICHOLE WILLIAMS (P696), in her own right as)
the Daughter of **JUANITA LEE**, Deceased)

ANTHONY JOHNSON (P697), in his own right as the Brother of **JUANITA LEE**, Deceased)
JOHN JOHNSON (P698), in his own right as the Brother of **JUANITA LEE**, Deceased)
JANET JOHNSON (P699), in her own right as the Sister of **JUANITA LEE**, Deceased)
CHERLY WITHERSPOON (P700), in her own right as the Sister of **JUANITA LEE**, Deceased)
SHIRLEY WALKER (P701), in her own right as the Sister of **JUANITA LEE**, Deceased)
JOAN GREENE (P702), in her own right as the Mother of **LORRAINE LEE**, Deceased)
TIMOTHY R. GREENE (P703), in his own right as the Brother of **LORRAINE LEE**, Deceased)
TERENCE GREENE (P704), in his own right as the Brother of **LORRAINE LEE**, Deceased)
THOMAS M. GREENE (P705), in his own right as the Brother of **LORRAINE LEE**, Deceased)
BARBARA WENTWORTH (P706), in her own right as the Sister of **LORRAINE LEE**, Deceased)
PATRICIA REILLY (P707), in her own right as the Sister of **LORRAINE LEE**, Deceased)
OTIS LEWIS (P708), in his own right as an Injured Party)
ANTHONY LICCIARDI (P709), in his own right as the Brother of **RALPH LICCIARDI**, Deceased)
EDWARD LOCHER (P710), in his own right as an Injured Party)
GEORGE T. LONG (P711), in his own right as the Father of **MAJOR STEPHEN V. LONG**, Deceased)
SANDRA S. WEAVER (P712), in her own right as the Mother of **MAJOR STEPHEN V. LONG**, Deceased)

DAVID LONG (P713), in his own right as the)
 Brother of **MAJOR STEPHEN V. LONG**,)
 Deceased)
)
GEORGE W. LONG (P714), in his own right as the)
 Brother of **MAJOR STEPHEN V. LONG**,)
 Deceased)
CYNTHIA LONG (P715), in her own right as the)
 Sister of **MAJOR STEPHEN V. LONG**, Deceased)
)
NANCY BURCHAM (P716), in her own right as the)
 Sister of **MAJOR STEPHEN V. LONG**, Deceased)
)
ARNALDO LOPEZ (P717), in his own right as an)
 Injured Party)
)
JAMES LOVERO (P718), in his own right and as)
 the Representative of the **ESTATE OF JOSEPH**)
LOVERO, Deceased)
)
JOHN PETER LOZOWSKY, SR. (P719), in his)
 own right as the Father of **JOHN P. LOZOWSKY**,)
 Deceased)
)
ROSEMARY LOZOWSKY (P720), in her own)
 right as the Mother of **JOHN P. LOZOWSKY**,)
 Deceased)
)
DEBRA A. RHODY (P721), in her own right as the)
 Sister of **JOHN P. LOZOWSKY**, Deceased)
)
MICHELLE LUDWIG (P722), in her own right and)
 as the Representative of the **ESTATE OF LEE**)
CHARLES LUDWIG, Deceased)
)
CHRISTOPHER LUDWIG (P723), in his own)
 right as the Son of **LEE CHARLES LUDWIG**,)
 Deceased)
)
ASHLEY LUDWIG (P724), in her own right as the)
 Daughter of **LEE CHARLES LUDWIG**, Deceased)
)
JESSE L. LYNCH (P725), in his own right as an)
 Injured Party)
)
JOHN B. LYNCH (P726), in his own right and as)
 the Representative of the **ESTATE OF MICHAEL**)
FRANCIS LYNCH, Deceased)
)
KATHLEEN V. LYNCH (P727), in her own right)

as the Mother of **MICHAEL FRANCIS LYNCH**,)
Deceased)
))
FREDERICK LYNCH (P728), in his own right as)
the Brother of **MICHAEL FRANCIS LYNCH**,)
Deceased)
))
KATHLEEN ANN LYNCH (P729), in her own)
right as the Sister of **MICHAEL FRANCIS**)
LYNCH, Deceased)
))
PATRICIA CURRY (P730), in her own right as the)
Sister of **ROBERT H. LYNCH**, Deceased)
))
LINDA MAFFEO (P731), in her own right and as)
the Representative of the **ESTATE OF JOSEPH**)
MAFFEO, Deceased)
))
LOUIS MAFFEO (P732), in his own right as the)
Father of **JOSEPH MAFFEO**, Deceased)
))
JEAN MAFFEO (P733), in her own right as the)
Mother of **JOSEPH MAFFEO**, Deceased)
))
DEBRA MAFFEO MORRI (P734), in her own)
right as the Sister of **JOSEPH MAFFEO**, Deceased)
))
LINDA MAFFEO MANFREDI (P735), in her own)
right as the Sister of **JOSEPH MAFFEO**, Deceased)
))
SUSAN MAFFEO DRURY (P736), in her own right)
as the Sister of **JOSEPH MAFFEO**, Deceased)
))
DONNA MAFFEO (P737), in her own right as the)
Sister of **JOSEPH MAFFEO**, Deceased)
))
LLEWELLYN MALCOLM (P738), in his own)
right as an Injured Party)
))
KENNETH R. MANNETTA (P739), in his own)
right, on behalf of the Minor Children, and as the)
Representative of the **ESTATE OF DEBRA M.**)
MANNETTA, Deceased)
))
CHARLES V. MARGIOTTA (P740), in his own)
right as the Father of **CHARLES JOSEPH**)
MARGIOTTA, Deceased)
))
AMELIA J. MARGIOTTA (P741), in her own right)
as the Mother of **CHARLES JOSEPH**)

MARGIOTTA, Deceased)
)
NORMA MARGIOTTA (P742), in her own right)
and on behalf of the Minor Children of CHARLES)
JOSEPH MARGIOTTA, Deceased)
)
)
MICHAEL MARGIOTTA (P743), in his own right)
as the Brother of CHARLES JOSEPH)
MARGIOTTA, Deceased)
)
)
CLAUDIA P. MARIN (P744), in her own right as)
an Injured Party)
)
)
JODI A. MARRERO (P745), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the ESTATE OF JOSE)
MARRERO, Deceased)
)
)
ANGELA MARTINEZ (P746), in her own right as)
an Injured Party)
)
)
MILDRED MARTINO (P747), in her own right and)
as the Co-Representative of the ESTATE OF)
ANNE MARIE MARTINO-CRAMER, Deceased)
)
)
ANTHONY MARTINO (P748), in his own right)
and as the Co-Representative of the ESTATE OF)
ANNE MARIE MARTINO-CRAMER, Deceased)
)
)
PATRICIA NILSEN (P749), in her own right and as)
the Co-Representative of the ESTATE OF ANNE)
MARIE MARTINO-CRAMER, Deceased)
)
)
MARGARET L. MATHERS (P750), in her own)
right and as the Representative of the ESTATE OF)
CHARLES W. MATHERS, Deceased)
)
)
ELIZABETH MATTSON (P751), in his own right)
and as the Representative of the ESTATE OF)
ROBERT D. MATTSON, Deceased)
)
)
JAMES F. MATTSON (P752), in his own right as)
the Son of ROBERT D. MATTSON, Deceased)
)
)
JEAN E. MATTSON (P753), in her own right as the)
Daughter of ROBERT D. MATTSON, Deceased)
)
)
VERTISTINE B. MBAYA (P754), in her own right)
and as the Representative of the ESTATE OF)

KAARIA WILLIAM MBAYA, Deceased)
))
KIBABU MBAYA (P755), in his own right as the)
Brother of **KAARIA WILLIAM MBAYA**,)
Deceased)
))
NJUE W. MBAYA (P756), in his own right as the)
Brother of **KAARIA WILLIAM MBAYA**,)
Deceased)
))
MARILYN MCGOVERN ZURICA (P757), in her)
own right as the Sister of **WILLIAM J.**)
MCGOVERN, Deceased)
))
SEMO P. SENNAS (P758), in his own right as the)
Father of **STACEY SENNAS MCGOWAN**,)
Deceased)
))
FRANCES N. SENNAS (P759), in her own right as)
the Mother of **STACEY SENNAS MCGOWAN**,)
Deceased)
))
MARY MCWILLIAMS (P760), in her own right as)
the Mother of **MARTIN E. MCWILLIAMS**,)
Deceased)
))
JOSEPH MCWILLIAMS (P761), in his own right)
as the Brother of **MARTIN E. MCWILLIAMS**,)
Deceased)
))
LYNN MCWILLIAMS (P762), in her own right as)
the Sister of **MARTIN E. MCWILLIAMS**,)
Deceased)
))
BARBARA MCWILLIAMS (P763), in her own)
right as the Sister of **MARTIN E. MCWILLIAMS**,)
Deceased)
))
NEXHAT MELA (P764), in his own right as an)
Injured Party)
))
JUDY MICHAELS (P765), in her own right as an)
Injured Party)
))
PATRICIA MILANO (P766), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF PETER**)
MILANO, Deceased)
))

)

ALFRED MILANO (P767), in his own right as the)
 Brother of **PETER MILANO**, Deceased)
)
FRANK MILANO (P768), in his own right as the)
 Brother of **PETER MILANO**, Deceased)
)
THOMAS MILANO (P769), in his own right as the)
 Brother of **PETER MILANO**, Deceased)
)
MAUREEN RACIOPPI (P770), in her own right as)
 the Sister of **PETER MILANO**, Deceased)
)
STELLA LAZARRA (P771), in her own right as the)
 Mother of **JOEL MILLER**, Deceased)
)
SONDRA FOWLER (P772), in her own right as the)
 Sister of **JOEL MILLER**, Deceased)
)
TOBY MILLMAN (P773), in her own right, on)
 behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF BENJAMIN**)
MILLMAN, Deceased)
)
RYAN PAUL MINARA (P774), in his own right as)
 the Son of **ROBERT MINARA**, Deceased)
)
CHRISTIAN MINARA (P775), in his own right as)
 the Son of **ROBERT MINARA**, Deceased)
)
NYKIA MORGAN (P776), in her own right and as)
 the Representative of the **ESTATE OF**)
DOROTHY R. MORGAN, Deceased)
)
GLENN MORGAN (P777), in his own right as the)
 Son of **RICHARD J. MORGAN**, Deceased)
)
KEVIN J. MORGAN (P778), in his own right as the)
 Brother of **RICHARD J. MORGAN**, Deceased)
)
LORRAINE MOSKAL (P779), in her own right, on)
 behalf of the Minor Child, and as the Representative)
 of the **ESTATE OF WILLIAM DAVID**)
MOSKAL, Deceased)
)
OMAR MOTA (P780), in his own right as an)
 Injured Party)
)
THOMAS MULLIGAN (P781), in his own right as)
 the Father of **PETER JAMES MULLIGAN**,)
_____)

Deceased)
)
NANCY MULLIGAN (P782), in her own right as)
 the Mother of **PETER JAMES MULLIGAN**,)
 Deceased)
)
MARITZA MUNOZ (P783), in her own right as the)
 Wife of **CARLOS M. MUNOZ**, Deceased)
)
MARY L. MURPHY (P784), in her own right and)
 on behalf of the Minor Children of **JAMES**)
THOMAS MURPHY, Deceased)
)
BALDEV NARULA (P785), in his own right and as)
 the Representative of the **ESTATE OF MANIKI**)
NARULA, Deceased)
)
MADHU NARULA (P786), in her own right as the)
 Mother of **MANIKI NARULA**, Deceased)
)
JOSE L. NIVAR (P787), in his own right as an)
 Injured Party)
)
SANTOS NUNEZ (P788), in his own right as an)
 Injured Party)
)
ROBERT T. O'BRIEN (P789), in his own right as)
 the Father of **MICHAEL P. O'BRIEN**, Deceased)
)
MARY LOU O'BRIEN (P790), in her own right as)
 the Mother of **MICHAEL P. O'BRIEN**, Deceased)
)
ANDREW T. O'BRIEN (P791), in his own right as)
 the Brother of **MICHAEL P. O'BRIEN**, Deceased)
)
BRIDGET PALUZZI (P792), in her own right as)
 the Sister of **MICHAEL P. O'BRIEN**, Deceased)
)
MARY DISHAW (P793), in her own right as the)
 Sister of **MICHAEL P. O'BRIEN**, Deceased)
)
KENNETH D. OLSON (P794), in his own right as)
 the Brother of **STEVEN J. OLSON**, Deceased)
)
ANGEL R. ORTIZ (P795), in his own right as an)
 Injured Party)
)
VERONICA N. ORTIZ (P796), in her own right as)
 an Injured Party)

VICTOR D. PANZELLA, JR. (P797), in his own right as an Injured Party)
)
YOGESH R. PATEL (P798), in his own right and as the Representative of the **ESTATE OF AVNISH RAMANBHAI PATEL**, Deceased)
RAMANBHAI PATEL, Deceased)
RAMANBHAI M. PATEL (P799), in his own right as the Father of **AVNISH RAMANBHAI PATEL**, Deceased)
)
SUSHILABEN R. PATEL (P800), in her own right as the Mother of **AVNISH RAMANBHAI PATEL**, Deceased)
)
JAYANT R. PATEL (P801), in his own right as the Father of **DIPTI PATEL**, Deceased)
)
KAPILA PATEL (P802), in her own right as the Mother of **DIPTI PATEL**, Deceased)
)
NIRAJ PATEL (P803), in his own right as the Brother of **DIPTI PATEL**, Deceased)
)
RANTIK PATEL (P804), in his own right as the Brother of **DIPTI PATEL**, Deceased)
)
NIMISHA PATEL (P805), in her own right as the Sister of **DIPTI PATEL**, Deceased)
)
VIBHUTI PATEL (P806), in her own right as the Sister of **DIPTI PATEL**, Deceased)
)
MILCIA C. PENA (P807), in her own right as an Injured Party)
)
GUIDO PERALTA (P808), in his own right as an Injured Party)
)
THOMAS F. PESCHERINE, SR. (P809), in his own right as the Father of **MICHAEL JOHN PESCHERINE**, Deceased)
)
ANNE MARIE PESCHERINE (P810), in her own right as the Mother of **MICHAEL JOHN PESCHERINE**, Deceased)
)
WILLIAM KEVIN PESCHERINE (P811), in his own right as the Brother of **MICHAEL JOHN PESCHERINE**, Deceased)

NANCY GIONCO (P812), in her own right as the
Sister of MICHAEL JOHN PESCHERINE,
Deceased

MANEULA PICHARDO (P813), in her own right
as an Injured Party

BARBARA L. POLHEMUS (P814), in her own
right and as the Representative of the ESTATE OF
THOMAS H. POLHEMUS, Deceased

SALVATORE PROVENZANO (P815), in his own
right as an Injured Party

MICHAEL QUACKENBUSH (P816), in his own
right as the Brother of CHRISTOPHER
QUACKENBUSH, Deceased

GAIL QUACKENBUSH (P817), in her own right as
the Sister of CHRISTOPHER QUACKENBUSH,
Deceased

LEONARD S. RAGAGLIA (P818), in his own right
and on behalf of the Minor Sibling of LEONARD
J. RAGAGLIA, Deceased

MAUREEN RAGAGLIA (P819), in her own right
as the Mother of LEONARD J. RAGAGLIA,
Deceased

DONNA RAGAGLIA (P820), in her own right and
on behalf of the Minor Children of LEONARD J.
RAGAGLIA, Deceased

LINDA TACCETTA (P821), in her own right as the
Sister of LEONARD J. RAGAGLIA, Deceased

VINCENT J. RAGUSA (P822), in his own right and
as the Representative of the ESTATE OF
MICHAEL PAUL RAGUSA, Deceased

DOMENICA RAGUSA (P823), in her own right as
the Mother of MICHAEL PAUL RAGUSA,
Deceased

KENNETH J. RAGUSA (P824), in his own right as
the Brother of MICHAEL PAUL RAGUSA,

Deceased)
)
VINCENT CARL RAGUSA (P825), in his own)
 right as the Brother of **MICHAEL PAUL**)
RAGUSA, Deceased)
)
CHRISTINE SALADEEN (P826), in her own right)
 as the Sister of **MICHAEL PAUL RAGUSA**,)
 Deceased)
)
LENORE RAIMONDI (P827), in her own right, on)
 behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF PETER F.**)
RAIMONDI, Deceased)
)
JUAN RAMIREZ (P828), in his own right as an)
 Injured Party)
)
ALFRED E. RANCKE (P829), in his own right as)
 the Father of **ALFRED TODD RANCKE**,)
 Deceased)
)
BARBARA B. RANCKE (P830), in her own right)
 as the Mother of **ALFRED TODD RANCKE**,)
 Deceased)
)
CYNTHIA RANCKE BIENEMANN (P831), in her)
 own right as the Sister of **ALFRED TODD**)
RANCKE, Deceased)
)
MICHAEL REINA (P832), in his own right as the)
 Brother of **JOSEPH REINA, JR.**, Deceased)
)
JOANN DEL PRETE (P833), in her own right as)
 the Sister of **JOSEPH REINA, JR.**, Deceased)
)
JUAN L. REYES (P834), in his own right as an)
 Injured Party)
)
WILLIAM D. RIVERSO (P835), in his own right)
 as the Brother of **JOSEPH R. RIVERSO**,)
 Deceased)
)
TERESA RIVERSO (P836), in her own right as the)
 Mother of **JOSEPH R. RIVERSO**, Deceased)
)
DOMENICO RIVERSO (P837), in his own right as)
 the Father of **JOSEPH R. RIVERSO**, Deceased)
)
 _____)

MARIA RIVERSO (P838), in her own right as the)
 Sister of **JOSEPH R. RIVERSO**, Deceased)
)
RALPH RIVERSO (P839), in his own right as the)
 Brother of **JOSEPH R. RIVERSO**, Deceased)
)
CONNIE RIZZO (P840), in her own right as the)
 Wife of **JOHN RIZZO**, Deceased)
BRYAN RODRIGUES (P841), in his own right as)
 an Injured Party)
)
JUDY MARTINEZ (P842), in her own right as the)
 Sister of **RICHARD RODRIGUES**, Deceased)
)
ROSAULINA RODRIGUEZ (P843), in her own)
 right as an Injured Party)
)
SUSANA ROJAS (P844), in her own right as an)
 Injured Party)
)
PETER C. ROSSOMANDO (P845), in his own)
 right as the Brother of **NICHOLAS P.**)
ROSSOMANDO, Deceased)
)
DONNA DEROSS (P846), in her own right as the)
 Sister of **NICHOLAS P. ROSSOMANDO**,)
 Deceased)
)
JASON ROTHBERG (P847), in his own right and)
 as the Representative of the **ESTATE OF**)
MICHAEL C. ROTHBERG, Deceased)
)
IRIS E. ROTHBERG (P848), in her own right as)
 the Mother of **MICHAEL C. ROTHBERG**,)
 Deceased)
)
RHONDA B. ROTHBERG (P849), in her own right)
 as the Sister of **MICHAEL C. ROTHBERG**,)
 Deceased)
)
RALPH SABBAG (P850), in his own right and as)
 the Representative of the **ESTATE OF JASON E.**)
SABBAG, Deceased)
)
BRIGITTE SABBAG (P851), in her own right as)
 the Mother of **JASON E. SABBAG**, Deceased)
)
ROSEMARIE GIALLOMBARDO (P852), in her)
 own right and as the Representative of the **ESTATE**)
OF PAUL RICHARD SALVIO, Deceased)

VINCENT GIALLOMBARDO (P853), in his own)
right as the Brother of **PAUL RICHARD SALVIO**,)
Deceased)
)

ROBERT GIALLOMBARDO, JR. (P854), in his)
own right as the Brother of **PAUL RICHARD)
SALVIO**, Deceased)
)

DINA GIALLOMBARDO (P855), in her own right)
as the Sister of **PAUL RICHARD SALVIO**,)
Deceased)
)

REINA SALZEDO (P856), in her own right as an)
Injured Party)
)

LUIS S. SAMANIEGO (P857), in his own right and)
as the Representative of the **ESTATE OF)
CARLOS A. SAMANIEGO**, Deceased)
)

LINDA J. SAMUEL (P858), in her own right and as)
the Representative of the **ESTATE OF JAMES K.)
SAMUEL, JR.**, Deceased)
)

JAMES K. SAMUEL (P859), in his own right as the)
Father of **JAMES K. SAMUEL, JR.**, Deceased)
)

JENNIFER AGRESTO (P860), in her own right as)
the Sister of **JAMES K. SAMUEL, JR.**, Deceased)
)

CARLOS SANCHEZ (P861), in his own right as an)
Injured Party)
)

CONCEPCION SANCHEZ (P862), in her own)
right as an Injured Party)
)

JOSE A. SANCHEZ, JR. (P863), in his own right as)
an Injured Party)
)

OSCAR F. SANDOVAL (P864), in his own right as)
an Injured Party)
)

ALBERTO SANTORO (P865), in his own right as)
the Father of **MARIO L. SANTORO**, Deceased)
)

VALERIY SAVINKIN (P866), in his own right and)
as the Representative of the **ESTATE OF)
VLADIMIR SAVINKIN**, Deceased)
)

VALENTINA SAVINKINA (P867), in her own)
)

right as the Mother of **VLADIMIR SAVINKIN**,)
 Deceased)
)
GALINA SAVINKINA (P868), in her own right as)
 the Sister of **VLADIMIR SAVINKIN**, Deceased)
)
PATRICIA SCHWARTZ (P869), in her own right)
 as the Wife of **MARK SCHWARTZ**, Deceased)
)
ANDREW SCHWARTZ (P870), in his own right as)
 the Son of **MARK SCHWARTZ**, Deceased)
)
JENNIFER SCHWARTZ (P871), in her own right)
 as the Daughter of **MARK SCHWARTZ**,)
 Deceased)
)
KEVIN M. SHEA, (P872) in his own right as an)
 Injured Party)
)
AVIGDOR SHWARTZSTEIN (P873), in his own)
 right as the Father of **ALLAN SHWARTZSTEIN**,)
 Deceased)
)
AHUVA SHWARTZSTEIN (P874), in her own)
 right as the Mother of **ALLAN SHWARTZSTEIN**,)
 Deceased)
)
MICHAEL SHWARTZSTEIN (P875), in his own)
 right as the Brother of **ALLAN**)
SHWARTZSTEIN, Deceased)
)
ORLY SMALL (P876), in her own right as the)
 Sister of **ALLAN SHWARTZSTEIN**, Deceased)
)
JENNIFER SIMON (P877), in her own right as an)
 Injured Party)
)
STEPHEN SIMONE (P878), in his own right as the)
 Son of **MARIANNE SIMONE**, Deceased)
)
TERESA HARGRAVE (P879), in her own right as)
 the Daughter of **MARIANNE SIMONE**, Deceased)
)
LISA CARDINALI (P880), in her own right as the)
 Daughter of **MARIANNE SIMONE**, Deceased)
)
VIRGINIA M. LIQUORI (P881), in her own right)
 as the Sister of **MARIANNE SIMONE**, Deceased)
)
LUCILLE BLEIMANN (P882), in her own right as)

the Sister of **MARIANNE SIMONE**, Deceased)
)
ELBA CEDENO (P883), as the Representative of)
 the **ESTATE OF CATHERINE T. SMITH**,)
 Deceased)
)
ANNETTE SMITH (P884), in her own right as the)
 Mother of **CATHERINE T. SMITH**, Deceased)
)
VINCENT SMITH (P885), in his own right as the)
 Brother of **CATHERINE T. SMITH**, Deceased)
)
WALTER SMITH (P886), in his own right as the)
 Brother of **CATHERINE T. SMITH**, Deceased)
)
LISA ANN ETHRIDGE (P887), in her own right as)
 the Sister of **CATHERINE T. SMITH**, Deceased)
)
BARBARA SCHIELZO (P888), in her own right as)
 the Sister of **CATHERINE T. SMITH**, Deceased)
)
ARTHUR A. SMITH (P889), in his own right as the)
 Father of **JEFFREY R. SMITH**, Deceased)
)
MADELINE W. SMITH (P890), in her own right as)
 the Mother of **JEFFREY R. SMITH**, Deceased)
)
BRENDA SMITH CLARK (P891), in her own right)
 as the Sister of **JEFFREY R. SMITH**, Deceased)
)
NETA SMITH (P892), in her own right as an)
 Injured Party)
)
CHERI SPARACIO (P893), in her own right, on)
 behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF THOMAS)
 SPARACIO**, Deceased)
)
NELLY STANICICH (P894), in her own right as an)
 Injured Party)
)
STACEY A. STAUB (P895), in her own right, on)
 behalf of the Minor Child, and as the Representative)
 of the **ESTATE OF CRAIG WILLIAM STAUB**,)
 Deceased)
)
MAXIMINO STERLING (P896), in his own right)
 as an Injured Party)
)
 _____)

JAMES J. STRAINE (P897), in his own right as the)
 Father of **JAMES J. STRAINE, JR.**, Deceased)
)
MARY E. STRAINE (P898), in her own right as the)
 Mother of **JAMES J. STRAINE, JR.**, Deceased)
)
KEVIN STRAINE (P899), in his own right as the)
 Brother of **JAMES J. STRAINE, JR.**, Deceased)
)
VIRGINIA STRAUCH (P900), in her own right and)
 as the Representative of the **ESTATE OF**)
GEORGE STRAUCH, Deceased)
)
LINDA P. SULFARO (P901), in her own right as an)
 Injured Party)
)
JERALD L. SULLIVAN, JR. (P902), in his own)
 right as an Injured Party)
)
PATRICK SULLIVAN (P903), in his own right and)
 as the Representative of the **ESTATE OF**)
PATRICK SULLIVAN, Deceased)
)
MARY SULLIVAN (P904), in her own right as the)
 Mother of **PATRICK SULLIVAN**, Deceased)
)
GREGORY SULLIVAN (P905), in his own right as)
 the Brother of **PATRICK SULLIVAN**, Deceased)
)
GERALD SULLIVAN (P906), in his own right as)
 the Brother of **PATRICK SULLIVAN**, Deceased)
)
ESTRELLA SUMAYA (P907), in her own right as)
 the Mother of **HILARIO SORIANO SUMAYA,**)
JR., Deceased)
)
REYNALDO SUMAYA (P908), in his own right as)
 the Brother of **HILARIO SORIANO SUMAYA,**)
JR., Deceased)
)
LISA SUMAYA (P909), in her own right as the)
 Sister of **HILARIO SORIANO SUMAYA, JR.**,)
 Deceased)
)
CHRISTINE TROTTA (P910), in her own right as)
 the Sister of **HILARIO SORIANO SUMAYA,**)
JR., Deceased)
)
CHARITO LEBLANC (P911), in her own right as)

the Sister of **HILARIO SORIANO SUMAYA, JR.**, Deceased)
)
MARIVEL PASSACANTANDO (P912), in her own right as the Sister of **HILARIO SORIANO SUMAYA, JR.**, Deceased)
)
GLENN SAVERY (P913), in his own right as an Injured Party)
)
CLIFFORD D. TEMPESTA (P914), in his own right as the Father of **ANTHONY TEMPESTA**, Deceased)
)
MAUREEN TIERI (P915), in her own right and on behalf of the Minor Children of **SAL TIERI**, Deceased)
)
JOHNNY TORRES (P916), in his own right as an Injured Party)
)
JUDY S. TROY (P917), in her own right, on behalf of the Minor Child, and as the Representative of the **ESTATE OF WILLIE A. TROY**, Deceased)
)
RENEE M. TROY (P918), in her own right as the Daughter of **WILLIE A. TROY**, Deceased)
)
NOSA E. UGIAGBE (P919), in his own right as an Injured Party)
)
GISELA VALENCIA (P920), in her own right as an Injured Party)
)
DENNIS J. VALENTIN (P921), in his own right as an Injured Party)
)
M. RITA VAN LAERE (P922), in her own right and as the Representative of the **ESTATE OF DANIEL VAN LAERE**, Deceased)
)
YUNI VASQUEZ (P923), in his own right as an Injured Party)
)
FRANK VISCIANO (P924), in his own right as the Father of **JOSEPH GERARD VISCIANO**, Deceased)
)
RAYMOND G. WALZ (P925), in his own right as the Father of **JEFFREY P. WALZ**, Deceased)

JENNIE WALZ (P926), in her own right as the
 Mother of **JEFFREY P. WALZ**, Deceased)
)
RAYMOND E. WALZ (P927), in his own right as
 the Brother of **JEFFREY P. WALZ**, Deceased)
)
KAREN CIACCIO (P928), in her own right as the
 Sister of **JEFFREY P. WALZ**, Deceased)
)
SHUN-FA WEN (P929), in his own right as the
 Father of **SSU-HUI WEN**, Deceased)
)
SHU-NU CHEN (P930), in her own right as the
 Mother of **SSU-HUI WEN**, Deceased)
)
YUN-JU WEN (P931), in her own right as the Sister
 of **SSU-HUI WEN**, Deceased)
)
CROSSLEY WILLIAMS, SR. (P932), in his own
 right as the Father of **CROSSLEY WILLIAMS,**
JR., Deceased)
)
ROGER WILLIAMS (P933), in his own right and
 as the Co-Representative of the **ESTATE OF**
KEVIN M. WILLIAMS, Deceased)
)
PATRICIA WILLIAMS (P934), in her own right
 and as the Co-Representative of the **ESTATE OF**
KEVIN M. WILLIAMS, Deceased)
)
MARY WILLIAMSON (P935), in her own right, on
 behalf of the Minor Children, and as the
 Representative of the **ESTATE OF JOHN P.**
WILLIAMSON, Deceased)
)
PATRICK WOODS (P936), in his own right as the
 Father of **PATRICK WOODS**, Deceased)
)
EILEEN WOODS (P937), in her own right as the
 Mother of **PATRICK WOODS**, Deceased)
)
THOMAS WOODS (P938), in his own right as the
 Brother of **PATRICK WOODS**, Deceased)
)
CHRIS WOODS (P939), in his own right as the
 Brother of **PATRICK WOODS**, Deceased)
)
JAY YASKULKA (P940), in his own right and as
 the Representative of the **ESTATE OF MYRNA**)
)

YASKULKA, Deceased)
))
FELICIA YOUNG (P941), in her own right and as)
the Representative of the **ESTATE OF DONALD**)
MCARTHUR YOUNG, Deceased)
))
JACK ZELMAN (P942), in his own right as the)
Father of **KENNETH ALBERT ZELMAN**,)
Deceased)
))
RUTH ZELMAN (P943), in her own right as the)
Mother of **KENNETH ALBERT ZELMAN**,)
Deceased)
))
BARRY ZELMAN (P944), in his own right as the)
Brother of **KENNETH ALBERT ZELMAN**,)
Deceased)
))
CARRIE BURLOCK (P945), in her own right as)
the Sister of **KENNETH ALBERT ZELMAN**,)
Deceased)
))
LEONARD ZEPLIN (P946), in his own right as the)
Father of **MARC SCOTT ZEPLIN**, Deceased)
))
LEONA ZEPLIN (P947), in her own right as the)
Mother of **MARC SCOTT ZEPLIN**, Deceased)
))
JOSLIN ZEPLIN (P948), in her own right as the)
Sister of **MARC SCOTT ZEPLIN**, Deceased)
))
ALLA PLAKHT (P949), in her own right, on behalf)
of the Minor Child, and as the Representative of the)
ESTATE OF IGOR ZUKELMAN, Deceased)
))
SON DOE # 42 (AP90), in his own right and as the)
Representative of the **ESTATE OF DECEDENT**)
DOE # 42, Deceased)
))
EX-SPOUSE DOE # 42 (AP91) on behalf of the)
Minor Child of **DECEDENT DOE # 42**, Deceased)
))
SPOUSE DOE # 43 (AP92), in her own right as the)
Wife of **DECEDENT DOE # 43**, Deceased)
))
BROTHER DOE # 44 (AP93), in his own right and)
as the Representative of the **ESTATE OF**)
DECEDENT DOE # 44, Deceased)
))
SPOUSE DOE # 45 (AP94), in her own right, on)

behalf of the Minor Child, and as the Representative)
of the **ESTATE OF DECEDENT DOE # 45,**)
Deceased)
)
FATHER DOE # 45 (AP95), in his own right as the)
Father of **DECEDENT DOE # 45,** Deceased)
)
BROTHER DOE # 45 (AP96), in his own right as)
the Brother of **DECEDENT DOE # 45,** Deceased)
)
SON DOE # 46 (AP97), in his own right as the Son)
of **DECEDENT DOE # 46,** Deceased)
)
DAUGHTER DOE # 46 (AP98), in her own right as)
the Daughter of **DECEDENT DOE # 46,** Deceased)
)
SPOUSE DOE # 47 (AP99), in her own right, on)
behalf of the Minor Child, and as the Representative)
of the **ESTATE OF DECEDENT DOE # 47,**)
Deceased)
)
SISTER DOE # 48 (AP100), in her own right as the)
Sister of **DECEDENT DOE # 48,** Deceased)
)
FATHER DOE # 49 (AP101), in his own right as the)
Father of **DECEDENT DOE # 49,** Deceased)
)
SPOUSE DOE # 49 (AP102), in her own right as the)
Wife of **DECEDENT DOE # 49,** Deceased)
)
SISTER DOE # 49 (AP103), in her own right as the)
Sister of **DECEDENT DOE # 49,** Deceased)
)
SPOUSE DOE # 50 (AP104), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF DECEDENT)
DOE # 50,** Deceased)
)
SISTER DOE # 50 (AP105), in her own right as the)
Sister of **DECEDENT DOE # 50,** Deceased)
)
SISTER DOE # 50 (AP106), in her own right as the)
Sister of **DECEDENT DOE # 50,** Deceased)
)
SON DOE # 51 (AP107), in his own right as the Son)
of **DECEDENT DOE # 51,** Deceased)
)
SON DOE # 51 (AP108), in his own right as the Son)
of **DECEDENT DOE # 51,** Deceased)
_____)

BROTHER DOE # 52 (AP109), in his own right as)
the Brother of **DECEDENT DOE # 52**, Deceased)
)
SISTER DOE # 52 (AP110), in her own right as the)
Sister of **DECEDENT DOE # 52**, Deceased)
)
SPOUSE DOE # 53 (AP111), in her own right and as)
the Representative of the **ESTATE OF**)
DECEDENT DOE # 53, Deceased)
)
FATHER DOE # 54 (AP112), in his own right as the)
Father of **DECEDENT DOE # 54**, Deceased)
)
MOTHER DOE # 54 (AP113), in her own right as)
the Mother of **DECEDENT DOE # 54**, Deceased)
)
BROTHER DOE # 54 (AP114), in his own right as)
the Brother of **DECEDENT DOE # 54**, Deceased)
)
BROTHER DOE # 54 (AP115), in his own right as)
the Brother of **DECEDENT DOE # 54**, Deceased)
)
SISTER DOE # 54 (AP116), in her own right as the)
Sister of **DECEDENT DOE # 54**, Deceased)
)
SISTER DOE # 54 (AP117), in her own right as the)
Sister of **DECEDENT DOE # 54**, Deceased)
)
SISTER DOE # 54 (AP118), in her own right as the)
Sister of **DECEDENT DOE # 54**, Deceased)
)
MOTHER DOE # 55 (AP119), in her own right and)
as the Representative of the **ESTATE OF**)
DECEDENT DOE # 55, Deceased)
)
SISTER DOE # 55 (AP120), in her own right as the)
Sister of **DECEDENT DOE # 55**, Deceased)
)
SISTER DOE # 55 (AP121), in her own right as the)
Sister of **DECEDENT DOE # 55**, Deceased)
)
MOTHER DOE # 56 (AP122), in her own right and)
as the Representative of the **ESTATE OF**)
DECEDENT DOE # 56, Deceased)
)
SISTER DOE # 56 (AP123), in her own right as the)
Sister of **DECEDENT DOE # 56**, Deceased)
)
SISTER DOE # 56 (AP124), in her own right as the)
Sister of **DECEDENT DOE # 56**, Deceased)

SPOUSE DOE # 58 (AP125), in her own right, on behalf of the Minor Children, and as the Representative of the **ESTATE OF DECEDENT DOE # 58**, Deceased

SPOUSE DOE # 59 (AP126), in her own right, on behalf of the Minor Children, and as the Representative of the **ESTATE OF DECEDENT DOE # 59**, Deceased

SPOUSE DOE # 60 (AP127), in her own right, on behalf of the Minor Children, and as the Representative of the **ESTATE OF DECEDENT DOE # 60**, Deceased

SECOND AMENDED PLAINTIFFS

HUMBERTO R. ACOSTA (P950), in his own right as an Injured Party

MARK AIKEN (P951), in her own right as an Injured Party

MARGUERITE G. ALLEN (P952), in her own right as the Sister of **RICHARD DENNIS ALLEN**, Deceased

INGRID ALLEYNE-ROBERTSON (P953), in her own right as an Injured Party

JAMES J. ALLINGHAM (P954), in his own right as the Brother of **CHRISTOPHER EDWARD ALLINGHAM**, Deceased

IVAN ALMENDAREZ, JR. (P955), in his own right as an Injured Party

GRACE ALVIAR (P956), in her own right and as the Representative of the **ESTATE OF CESAR A. ALVIAR**, Deceased

CHRISTOPHER ALVIAR (P957), in his own right as the Son of **CESAR A. ALVIAR**, Deceased

GEMMA ALVIAR (P958), in her own right as the Daughter of **CESAR A. ALVIAR**, Deceased

GIANINA ALVIAR (P959), in her own right as the

Daughter of **CESAR A. ALVIAR**, Deceased)
)
DONNA L. ANGELINI (P960), in her own right, on)
 behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF JOSEPH**)
JOHN ANGELINI, II, Deceased)
)
MARGARET APOSTOL (P961), in her own right)
 as the Sister of **FAUSTINO APOSTOL**, Deceased)
)
FRANK J. AQUILINO (P962), in his own right as)
 the Father of **FRANK T. AQUILINO**, Deceased)
)
SUZANNE ARNOLD (P963), in her own right as an)
 Injured Party)
)
CARMEN MEJIA (P964), in her own right as the)
 Wife of **MANUAL ASITIMBAY**, Deceased)
)
LYNETTE BANGAREE (P965), in her own right)
 as an Injured Party)
)
GENTIL BAPTISTE (P966), in his own right as an)
 Injured Party)
)
MARINA BARBOSA (P967), in her own right as)
 the Wife of **VICTOR BARBOSA**, Deceased)
)
NANCY SANTANA (P968), in her own right as the)
 Mother of **VICTOR BARBOSA**, Deceased)
)
BURNEY BATES (P969), in her own right as an)
 Injured Party)
)
RAMESES G. BAUTISTA (P970), in his own right)
 and as the Representative of the **ESTATE OF**)
MARLYN C. BAUTISTA, Deceased)
)
NARCISA G. CAPITO (P971), in her own right as)
 the Mother of **MARLYN C. BAUTISTA**, Deceased)
)
RUFINA C. COQUIA (P972), in his own right as)
 the Brother of **MARLYN C. BAUTISTA**,)
 Deceased)
)
ANISIA C. ABARABAR (P973), in her own right as)
 the Sister of **MARLYN C. BAUTISTA**, Deceased)
)
THOMAS BEATTIE (P974), in his own right as an)
Injured Party)

JANICE BEATTY (P975), in her own right as an Injured Party)
GAIL BENZMAN (P976), in her own right as an Injured Party)
GEORGE R. BERGIN (P977), in his own right as the Father of **JOHN P. BERGIN**, Deceased)
AGNES BERGIN (P978), in her own right as the Mother of **JOHN P. BERGIN**, Deceased)
GEORGE M. BERGIN (P979), in his own right as the Brother of **JOHN P. BERGIN**, Deceased)
MARY ELLEN O'ROURKE (P980), in her own right as the Sister of **JOHN P. BERGIN**, Deceased)
ALICE HOGLAN (P981), in her own right and as the Representative of the **ESTATE OF MARK BINGHAM**, Deceased)
RAYMOND BINI (P982), in his own right as the Father of **CARL BINI**, Deceased)
CHESTER BOTCH (P983), in his own right as an Injured Party)
VLADIMIR BOYARSKY (P984), in his own right as the Father of **GENNADY BOYARSKY**, Deceased)
BELLA BOYARSKY (P985), in her own right as the Mother of **GENNADY BOYARSKY**, Deceased)
ANTHONY BENGIVENGA (P986), in his own right as the Fiance of **LYDIA BRAVO**, Deceased)
DAVID ALLEN BRIDGEFORTH (P987), in his own right as an Injured Party)
JULIETTE BRISMAN (P988), in her own right and as the Representative of the **ESTATE OF MARK BRISMAN**, Deceased)
GERARD BRISMAN (P989), in his own right as the Father of **MARK BRISMAN**, Deceased)
STEVEN BRISMAN (P990), in his own right as the)

Brother of **MARK BRISMAN**, Deceased)
)
MICHELE PRIEST (P991), in her own right as the)
 Sister of **MARK BRISMAN**, Deceased)
)
JACQUELINE ISKOLS (P992), in her own right as)
 the Sister of **MARK BRISMAN**, Deceased)
)
ISOLINE BROOMFIELD (P993), in her own right)
 as the Wife of **KEITH BROOMFIELD**, Deceased)
VICTORIA CABEZAS (P994), in her own right as)
 the Wife of **JESUS CABEZAS**, Deceased)
)
MARIA CEBALLOS (P995), in her own right as an)
 Injured Party)
)
DOMINGO CEPEDA (P996), in his own right as an)
 Injured Party)
)
MABLE CHALCOFF (P997), in her own right and)
 as the Representative of the **ESTATE OF**)
WILLIAM CHALCOFF, Deceased)
)
BRIAN CHALCOFF (P998), in his own right as the)
 Son of **WILLIAM CHALCOFF**, Deceased)
)
ERIC CHALCOFF (P999), in his own right as the)
 Son of **WILLIAM CHALCOFF**, Deceased)
)
JAMES CLARKE (P1000), in his own right as the)
 Brother of **MICHAEL CLARKE**, Deceased)
)
ANTHONY COIRO (P1001), in his own right as an)
 Injured Party)
)
JAYMEL E. CONNOR (P1002), in her own right)
 and as the Representative of the **ESTATE OF**)
JAMES L. CONNOR, Deceased)
)
JOEL COUNCIL (P1003), in his own right as an)
 Injured Party)
)
JOHN CRETELLA (P1004), in his own right as an)
 Injured Party)
)
JOANNE C. CROTTY (P1005), in her own right)
 and as the Representative of the **ESTATE OF**)
THOMAS G. CROTTY, Deceased)
)
THOMAS M. CROTTY (P1006), in his own right)

as the Father of **THOMAS G. CROTTY**, Deceased)
)
PATRICIA M. CROTTY (P1007), in her own right)
 as the Mother of **THOMAS G. CROTTY**,)
 Deceased)
)
KENNETH CROTTY (P1008), in his own right as)
 the Brother of **THOMAS G. CROTTY**, Deceased)
)
)
JOHN CROTTY (P1009), in his own right as the)
 Brother of **THOMAS G. CROTTY**, Deceased)
)
JAMES G. CROTTY (P1010), in his own right as)
 the Brother of **THOMAS G. CROTTY**, Deceased)
)
JEFFERSON H. CROWTHER (P1011), in his own)
 right and as the Representative of the **ESTATE OF**)
WELLES REMY CROWTHER, Deceased)
)
ALISON R. CROWTHER (P1012), in her own)
 right as the Mother of **WELLES REMY**)
CROWTHER, Deceased)
)
HONOR ELIZABETH CROWTHER (P1013), in)
 his own right as the Brother of **WELLES REMY**)
CROWTHER, Deceased)
)
PAIGE H. CROWTHER (P1014), in her own right)
 as the Sister of **WELLES REMY CROWTHER**,)
 Deceased)
)
ANTHONY CURATOLO (P1015), in his own right)
 as the Father of **ROBERT CURATOLO**, Deceased)
)
MARY ANN CURATOLO (P1016), in her own)
 right as the Mother of **ROBERT CURATOLO**,)
 Deceased)
)
CHRISTINE CURATOLO (P1017), in her own)
 right as the Wife of **ROBERT CURATOLO**,)
 Deceased)
)
WILLIAM CURATOLO (P1018), in his own right)
 as the Brother of **ROBERT CURATOLO**,)
 Deceased)
)
JOHN CURATOLO (P1019), in his own right as the)
 Brother of **ROBERT CURATOLO**, Deceased)
)
)

ANTHONY CURATOLO (P1020), in his own right)
as the Brother of **ROBERT CURATOLO**,)
Deceased)
))
CHRISTINE FRISCIA (P1021), in her own right as)
the Sister of **ROBERT CURATOLO**, Deceased)
))
DENA NELSON (P1022), in her own right as the)
Sister of **ROBERT CURATOLO**, Deceased)
))
KATHLEEN CURATOLO (P1023), in her own)
right as the Sister of **ROBERT CURATOLO**,)
Deceased)
))
CAROLYN PICCIRILLO (P1024), in her own)
right as the Sister of **ROBERT CURATOLO**,)
Deceased)
))
JOSEPH CURIA (P1025), in his own right as the)
Father of **LAURENCE CURIA**, Deceased)
))
ALICE CURIA (P1026), in her own right as the)
Mother of **LAURENCE CURIA**, Deceased)
))
LOUISA D'ANTONIO (P1027), in her own right as)
an Injured Party)
))
SIMONE MITCHELL (P1028), on her own behalf)
and on behalf of the Minor Child of **CLINTON**)
DAVIS, Deceased)
))
ANDRES DE LA ROSA (P1029), in his own right)
as an Injured Party)
))
PATRICIA DEANGELIS (P1030), in her own right)
and on behalf of the Minor Child of **THOMAS P.**)
DEANGELIS, Deceased)
))
THOMAS J. DEANGELIS (P1031), in his own)
right as the Son of **THOMAS P. DEANGELIS**,)
Deceased)
))
CHRISTINE CAPUTO (P1032), in her own right as)
the Daughter of **THOMAS P. DEANGELIS**,)
Deceased)
))
JACQUES DEBEUNEURE (P1033), in his own)
right and as the Representative of the **ESTATE OF**)
JAMES D. DEBEUNEURE, Deceased)
))

)

SALLY DELEO (P1034), in her own right, on behalf)
of the Minor Children, and as the Representative of)
the **ESTATE OF VITO J. DELEO**, Deceased)
)
PETER DEPALMA (P1035), in his own right as an)
Injured Party)
)
JOANNE DESIMONE (P1036), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF EDWARD**)
DESIMONE, III, Deceased)
EDWARD DESIMONE, JR. (P1037), in his own)
right as the Father of **EDWARD DESIMONE, III**,)
Deceased)
)
ANGELINA TRIMBOLI (P1038), in her own right)
as the Mother of **EDWARD DESIMONE, III**,)
Deceased)
)
MICHELE YOUNG (P1039), in her own right as)
the Sister of **EDWARD DESIMONE, III**,)
Deceased)
)
ANEX DESINOR (P1040), in his own right as an)
Injured Party)
)
ARCELIA DIAZ (P1041), in her own right as the)
Mother of **JUDITH BERQUIS DIAZ-SIERRA**,)
Deceased)
)
JOEL SHAPIRO (P1042), in his own right and as)
the Representative of the **ESTATE OF SAREVE**)
DUKAT, Deceased)
)
AUDREY ECONOMOS (P1043), in her own right)
and as the Representative of the **ESTATE OF**)
CONSTANTINE ECONOMOS, Deceased)
)
ANTONIO FERNANDEZ (P1044), in his own right)
as an Injured Party)
)
KAREN FIORITO (P1045), in her own right, on)
behalf of the Minor Child, and as the Representative)
of the **ESTATE OF JOHN B. FIORITO**,)
Deceased)
)
SUSAN FISHER (P1046), in her own right and as)
the Representative of the **ESTATE OF THOMAS**)
J. FISHER, Deceased)

)

LORETTA A. PALISAY (P1047), in her own right)
as the Mother of **SALVATORE A.**)
FIUMEFREDDO, Deceased)
))
MICHAEL FODOR (P1048), in his own right as the)
Father of **MICHAEL N. FODOR**, Deceased)
))
CHARLES FREEMAN (P1049), in his own right as)
an Injured Party)
))
CELESTE MARINO GARCIA (P1050), in her own)
right and as the Representative of the **ESTATE OF**)
CESAR R. GARCIA, Deceased)
JACQUELINE S. GAVAGAN (P1051), in her own)
right, on behalf of the Minor Children, and as the)
Representative of the **ESTATE OF DONALD R.**)
GAVAGAN, Deceased)
))
MATHILDA GEIDEL (P1052), in her own right)
and on behalf of the Minor Child of **GARY PAUL**)
GEIDEL, Deceased)
))
JACQUELINE GILBERT (P1053), in her own)
right, on behalf of the Minor Children, and as the)
Representative of the **ESTATE OF TIMOTHY**)
PAUL GILBERT, Deceased)
))
DEENA GILBEY (P1054), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF PAUL**)
STUART GILBEY, Deceased)
))
ALYCE GOLDSTEIN (P1055), in her own right as)
the Mother of **STEVEN IAN GOLDSTEIN**,)
Deceased)
))
ROBERT JAY GOLDSTEIN (P1056), in his own)
right as the Brother of **STEVEN IAN**)
GOLDSTEIN, Deceased)
))
ROXANNE GREEN (P1057), in her own right and)
as the Representative of the **ESTATE OF WADE**)
BRIAN GREEN, Deceased)
))
THOMAS GREEN (P1058), in his own right as the)
Father of **WADE BRIAN GREEN**, Deceased)
))
WILHEMINA GREEN (P1059), in her own right as)
the Mother of **WADE BRIAN GREEN**, Deceased)
))

)

DANIELLE GREEN (P1060), in her own right as)
 the Daughter of **WADE BRIAN GREEN**,)
 Deceased)
)
ANTHONY GREEN (P1061), in his own right as)
 the Brother of **WADE BRIAN GREEN**, Deceased)
)
BARRY GREEN (P1062), in his own right as the)
 Brother of **WADE BRIAN GREEN**, Deceased)
)
ALICIA MCDOW (P1063), in her own right as the)
 Sister of **WADE BRIAN GREEN**, Deceased)
)
MICHAEL GREENE (P1064), in his own right as)
 an Injured Party)
)
JOANNE GRZELAK (P1065), in her own right and)
 as the Representative of the **ESTATE OF JOSEPH**)
GRZELAK, Deceased)
)
RAFAEL GUDMUCH (P1066), in his own right as)
 an Injured Party)
)
PATRICIA THOMPSON-HAENTZLER (P1067),)
 in her own right as the Wife of **PHILIP**)
HAENTZLER, Deceased)
)
STEVE HAGIS, SR. (P1068), in his own right as an)
 Injured Party)
)
STEVE HAGIS, SR. (P1069), in his own right as the)
 Father of **STEVEN M. HAGIS**, Deceased)
)
MARYJANE HAGIS (P1070), in her own right as)
 the Mother of **STEVEN M. HAGIS**, Deceased)
)
CHRISTOPHER HAGIS (P1071), in his own right)
 as the Brother of **STEVEN M. HAGIS**, Deceased)
)
STACY HAGIS BRUNO (P1072), in her own right)
 as the Sister of **STEVEN M. HAGIS**, Deceased)
)
BRENDA HALLIGAN (P1073), in her own right as)
 the Mother of **ROBERT JOHN HALLIGAN**,)
 Deceased)
)
JAMES E. HALLIGAN (P1074), in his own right as)
 the Son of **ROBERT JOHN HALLIGAN**,)
 Deceased)

SARAH JANE ROBBINS (P1075), in her own right)
as the Daughter of **ROBERT JOHN HALLIGAN**,)
Deceased)

LARA STACEY (P1076), in her own right as the)
Daughter of **ROBERT JOHN HALLIGAN**,)
Deceased)

DAVID MITCHELL HALLIGAN (P1077), in his)
own right as the Brother of **ROBERT JOHN**)
HALLIGAN, Deceased)

WILLIAM G. HALLIGAN (P1078), in his own)
right as the Brother of **ROBERT JOHN**)
HALLIGAN, Deceased)

MARY KATHLEEN LYNN (P1079), in her own)
right as the Sister of **ROBERT JOHN**)
HALLIGAN, Deceased)

ELIZABETH HAMILTON (P1080), in her own)
right, and on behalf of the Minor Children, of)
ROBERT HAMILTON, Deceased)

ROBERT I. HARPER, JR. (P1081), in his own)
right as an Injured Party)

HOWARD HAWKINS (P1082), in his own right as)
an Injured Party)

MARILYN D. HECKSTALL (P1083), in her own)
right as an Injured Party)

RUSTY HENRY (P1084), in his own right as an)
Injured Party)

LESLIE SUE HERSCH (P1085), in her own right)
and as the Representative of the **ESTATE OF**)
JEFFREY A. HERSCH, Deceased)

DIANA HETZEL (P1086), in her own right, on)
behalf of the Minor Child, and as the Representative)
of the **ESTATE OF THOMAS J. HETZEL**,)
Deceased)

EGON HETZEL (P1087), in his own right as the)
Father of **THOMAS J. HETZEL**, Deceased)

BARBARA HETZEL (P1088), in her own right as the Mother of **THOMAS J. HETZEL**, Deceased)
DANIEL HETZEL (P1089), in his own right as the Brother of **THOMAS J. HETZEL**, Deceased)
DORINE HETZEL (P1090), in her own right as the Sister of **THOMAS J. HETZEL**, Deceased)
ANA ROSARIO (P1091), in her own right as the domestic partner of **EMENCIO DARIO HIDALGO**, Deceased)
GEORGE V. HINDY (P1092), in his own right and as the Representative of the **ESTATE OF MARK D. HINDY**, Deceased)
GWENNETT HODGE (P1093), in her own right as an Injured Party)
BEULAH HOLMES (P1094), in her own right as the Mother of **ELIZABETH HOLMES**, Deceased)
THOMAS HOLMES (P1095), in his own right as the Brother of **ELIZABETH HOLMES**, Deceased)
WALTER BYAS (P1096), in his own right as the Brother of **ELIZABETH HOLMES**, Deceased)
CHRISTOPHER HOLMES, JR. (P1097), in his own right as the Brother of **ELIZABETH HOLMES**, Deceased)
LOUISE ELLERBE (P1098), in her own right as the Sister of **ELIZABETH HOLMES**, Deceased)
LISA HORD (P1099), in her own right, on behalf of the Minor Children, and as the Representative of the **ESTATE OF MONTGOMERY HORD**, Deceased)
PATRICIA M. HOROHOE (P1100), in her own right and as the Representative of the **ESTATE OF ROBERT L. HOROHOE, JR.**, Deceased)
MICHAEL E. HOROHOE (P1101), in his own right as the Brother of **ROBERT L. HOROHOE, JR.**, Deceased)
PATRICIA M. WITSCHERL (P1102), in her own)

right as the Sister of **ROBERT L. HOROHOE, JR.**, Deceased)
)
DONNA M. ERSKINE (P1103), in her own right as)
 the Sister of **ROBERT L. HOROHOE, JR.**,)
 Deceased)
)
JOSEPH W. HROMADA (P1104), in his own right)
 as the Husband of **MILAGROS HROMADA**,)
 Deceased)
)
HENRY HUGHES (P1105), in his own right and as)
 the Representative of the **ESTATE OF KRIS)
 ROBERT HUGHES**, Deceased)
ELAINE HUGHES (P1106), in her own right as the)
 Mother of **KRIS ROBERT HUGHES**, Deceased)
)
KEITH HUGHES (P1107), in his own right as the)
 Brother of **KRIS ROBERT HUGHES**, Deceased)
)
KIMBERLY FRANCO (P1108), in her own right as)
 the Sister of **KRIS ROBERT HUGHES**, Deceased)
)
ROSANNE HUGHES (P1109), in her own right, on)
 behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF THOMAS F.)
 HUGHES, JR.**, Deceased)
)
AMIRHA VICTORIA HUTTO (P1110), in her)
 own right as an Injured Party)
)
JENNIFER THOMPSON (P1111), in her own right)
 as the Sister of **JOSEPH A. IANELLI**, Deceased)
)
MONICA PALATUCCI (P1112), in her own right)
 as the Fiancée of **JOSEPH A. IANELLI**, Deceased)
)
STEVEN IRGANG (P1113), in his own right and as)
 the Representative of the **ESTATE OF DOUG)
 IRGANG**, Deceased)
)
JOANNE IRGANG (P1114), in her own right as the)
 Mother of **DOUG IRGANG**, Deceased)
)
ALINE JENKINS (P1115), in her own right as the)
 Mother of **JOSEPH JENKINS, JR.**, Deceased)
)
GORDON R. JENKINS (P1116), in his own right as)
 the Brother of **JOSEPH JENKINS, JR.**, Deceased)
)

MICHAEL JENKINS (P1117), in his own right as)
 the Brother of **JOSEPH JENKINS, JR.**, Deceased)
)
DEBRA JENKINS (P1118), in her own right as the)
 Sister of **JOSEPH JENKINS, JR.**, Deceased)
)
HUMBERTO JIMENEZ (P1119), in his own right)
 as an Injured Party)
)
ROBERT JOHNSON, JR. (P1120), in his own right)
 as an Injured Party)
)
DONALD T. JONES (P1121), in his own right as)
 the Father of **DONALD T. JONES, II**, Deceased)
JUDITH JONES (P1122), in her own right as the)
 Mother of **DONALD T. JONES, II**, Deceased)
)
WILLIAM B. JONES, II (P1123), in his own right)
 as the Brother of **DONALD T. JONES, II**,)
 Deceased)
)
VINCENT KANE (P1124), in his own right and as)
 the Representative of the **ESTATE OF VINCENT**)
KANE, Deceased)
)
JOAN KANE (P1125), in her own right as the)
 Mother of **VINCENT KANE**, Deceased)
)
PATRICIA FLANDERS (P1126), in her own right)
 as the Sister of **VINCENT KANE**, Deceased)
)
ELIZABETH KANE REICH (P1127), in her own)
 right as the Sister of **VINCENT KANE**, Deceased)
)
GEORGE KAPERONIS (P1128), in his own right)
 as an Injured Party)
)
NINA KOSTIC (P1129), in her own right and as the)
 Representative of the **ESTATE OF BOJAN**)
KOSTIC, Deceased)
)
NANCY KUMPEL (P1130), in her own right, on)
 behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF KENNETH B.**)
KUMPEL, Deceased)
)
ROSETTA LA VENA (P1131), in her own right as)
 an Injured Party)
)
SONIA GAWAS (P1132), in her own right and as)

the Representative of the **ESTATE OF GANESH**)
LADKAT, Deceased)
)
DOLORES LADLEY (P1133), in her own right as)
 the Mother of **JAMES PATRICK LADLEY**,)
 Deceased)
)
PATRICK LADLEY (P1134), in his own right as)
 the Brother of **JAMES PATRICK LADLEY**,)
 Deceased)
)
DANIEL LADLEY (P1135), in his own right as the)
 Brother of **JAMES PATRICK LADLEY**,)
 Deceased)
EILEEN SPINA (P1136), in her own right as the)
 Sister of **JAMES PATRICK LADLEY**, Deceased)
)
MARY ANN RAYMOND (P1137), in her own right)
 as the Sister of **JAMES PATRICK LADLEY**,)
 Deceased)
)
VIRGINIA LATOUCHE (P1138), in her own right)
 as the Wife of **JEFFREY LATOUCHE**, Deceased)
)
THOMAS A. LA VERDE (P1139), in his own right)
 as the Brother of **JEANNINE LAVERDE**,)
 Deceased)
)
WALTER LAWRENCE (P1140), in his own right)
 as the Brother of **ROBERT A. LAWRENCE, JR.**,)
 Deceased)
)
VYACHESLAV LIGAY (P1141), in her own right,)
 on behalf of the Minor Child, and as the)
 Representative of the **ESTATE OF ZHENTTA**)
TSOY LIGAY, Deceased)
)
MAXINE MCCORMACK (P1142), in her own)
 right as the Daughter of **JOSEPH LOVERO**,)
 Deceased)
)
DANIEL LUGE (P1143), in his own right as an)
 Injured Party)
)
VLADIMIR LYGIN (P1144), in his own right and)
 as the Co-Representative of the **ESTATE OF**)
ALEXANDER LYGIN, Deceased)
)
VALENTINA LYGINA (P1145), in her own right)
and as the Co-Representative of the **ESTATE OF**)

ALEXANDER LYGIN, Deceased)
)
NATASHA LYGIN (P1146), in her own right as)
 the Sister of **ALEXANDER LYGIN**, Deceased)
)
LORNE LYLES (P1147), in his own right, on behalf)
 of the Minor Children, and as the Representative of)
 the **ESTATE OF CEECEE LYLES**, Deceased)
)
PAUL LYNCH (P1148), in his own right as the)
 Brother of **MICHAEL FRANCIS LYNCH**,)
 Deceased)
)
MAUREEN LYNCH BAKER (P1149), in her own)
 right as the Sister of **MICHAEL FRANCIS**)
LYNCH, Deceased)
)
MARGUERITE LYNCH (P1150), in her own right)
 as the Mother of **ROBERT H. LYNCH**, Deceased)
)
LINDA HELCK (P1151), in her own right as the)
 Sister of **ROBERT H. LYNCH**, Deceased)
)
BARBARA COTTER (P1152), in her own right as)
 the Sister of **ROBERT H. LYNCH**, Deceased)
)
MAUREEN MADDISON (P1153), in her own right)
 and as the Representative of the **ESTATE OF**)
SIMON MADDISON, Deceased)
)
JOSE MALDONADO (P1154), in his own right as)
 an Injured Party)
)
JOSE MARTINEZ (P1155), in his own right as an)
 Injured Party)
)
RICHARD CIMAROLI (P1156), in his own right as)
 the Father of **PATRICIA ANN MASSARI**,)
 Deceased)
)
ANNA E. CIMAROLI (P1157), in her own right as)
 the Mother of **PATRICIA ANN MASSARI**,)
 Deceased)
)
JOSEPH CIMAROLI (P1158), in his own right as)
 the Brother of **PATRICIA ANN MASSARI**,)
 Deceased)
)
DENISE MATUZA (P1159), in her own right, on)

behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF WALTER**)
MATUZA, Deceased)
)
ANNE MARIE MCCANN (P1160), in her own right)
 and on behalf of the Minor Children of **THOMAS**)
J. MCCANN, Deceased)
)
MARY SUE MCGOVERN (P1161), in her own)
 right, on behalf of the Minor Child, and as the)
 Representative of the **ESTATE OF WILLIAM J.**)
MCGOVERN, Deceased)
)
ROBERT M. MCGUIRE (P1162), in his own right)
 as an Injured Party)
)
PATRICIA MCKENNA (P1163), in her own right)
 as the Sister of **STEPHANIE MCKENNA**,)
 Deceased)
)
OSCAR H. MEJIA (P1164), in his own right as an)
 Injured Party)
)
JULIA HERNANDEZ (P1165), in her own right as)
 the Domestic Partner of **ANTONIO MELENDEZ**,)
 Deceased)
)
ROBERTO MESA (P1166), in his own right as an)
 Injured Party)
)
PATRICIA SKIC (P1167), in her own right as the)
 Fiance of **MICHAEL MATTHEW MILLER**,)
 Deceased)
)
GERALD MINGIONE (P1168), in his own right as)
 the Father of **THOMAS MINGIONE**, Deceased)
)
ANTONINA MINGIONE (P1169), in her own right)
 as the Mother of **THOMAS MINGIONE**,)
 Deceased)
)
MARINA MOLINA (P1170), in her own right as the)
 Mother of **MANUEL MOLINA**, Deceased)
)
VALENTINA FERREIRA DIAZ (P1171), in her)
 own right as the Wife of **MANUEL MOLINA**,)
 Deceased)
)
RAMON DEJESUS MOLINA (P1172), in his own)

right as the Brother of **MANUEL MOLINA**,)
 Deceased)
)
JUAN JOSE MOLINA (P1173), in his own right as)
 the Brother of **MANUEL MOLINA**, Deceased)
)
MILEDE ATLAGRACIA MOLINA (P1174), in)
 her own right as the Sister of **MANUEL MOLINA**,)
 Deceased)
)
FANNY DEJESUS MOLINA (P1175), in her own)
 right as the Sister of **MANUEL MOLINA**,)
 Deceased)
)
MARIA CARMEN MOLINA (P1176), in her own)
 right as the Sister of **MANUEL MOLINA**,)
 Deceased)
)
BERNARD MONAGHAN (P1177), in his own right)
 and as the Representative of the **ESTATE OF**)
BRIAN PATRICK MONAGHAN, Deceased)
)
DANIELLE MONAGHAN (P1178), in her own)
 right as the Sister of **BRIAN PATRICK**)
MONAGHAN, Deceased)
)
MATTHEW MONAHAN (P1179), in his own right)
 and as the Representative of the **ESTATE OF**)
FRANKLYN MONAHAN, Deceased)
)
JOSEPHINE MONTE (P1180), in her own right as)
 an Injured Party)
)
MICHAEL MOZZILLO (P1181), in his own right)
 as the Father of **CHRISTOPHER MOZZILLO**,)
 Deceased)
)
LYDIA MOZZILLO (P1182), in her own right as)
 the Mother of **CHRISTOPHER MOZZILLO**,)
 Deceased)
)
SUSAN KING MUNHALL (P1183), in her own)
 right, on behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF JAMES**)
DONALD MUNHALL, Deceased)
)
VALERIY MURATOV (P1184), in his own right as)
 an Injured Party)
)

RORY OWENS MURRAY (P1185), in her own right, on behalf of the Minor Child, and as the Representative of the **ESTATE OF JOHN J. MURRAY**, Deceased)
JULIANNE NAZARIO (P1186), in her own right, on behalf of the Minor Child, and as the Representative of the **ESTATE OF FRANCIS J. NAZARIO**, Deceased)
BRIDGET NEE (P1187), in her own right as an Injured Party)
JOHN NIMMO, III (P1188), in his own right as an Injured Party)
ELLEN NIVEN (P1189), in her own right and as the Representative of the **ESTATE OF JOHN BALLENTINE NIVIN**, Deceased)
KOFI NYANTAKYI (P1190), in his own right as an Injured Party)
KATHLEEN TIGHE (P1191), in her own right as the Sister of **TIMOTHY M. O'BRIEN**, Deceased)
THERESE A. VISCONTI (P1192), in her own right as the Sister of **TIMOTHY M. O'BRIEN**, Deceased)
FRANCIS P. O'HAGAN (P1193), in his own right as the Brother of **THOMAS G. O'HAGAN**, Deceased)
ELIZABETH SHERRY (P1194), in her own right as the Sister of **ROBERT O'SHEA**, Deceased)
KAYODE OLADUNJOYE (P1195), in his own right as an Injured Party)
TAUBE OLSEN (P1196), in his own right and as the Representative of the **ESTATE OF ERIC TAUBE OLSEN**, Deceased)
BARBARA OLSEN (P1197), in her own right as the Mother of **ERIC TAUBE OLSEN**, Deceased)
OLGA ORGIELEWICZ (P1198), in her own right and as the Representative of the **ESTATE OF CHRISTOPHER T. ORGIELEWICZ**, Deceased)

STEPHEN V. OSTROWSKI (P1199), in his own
right as the Father of **JAMES ROBERT**
OSTROWSKI, Deceased)
)
BEVERLY ANN OSTROWSKI (P1200), in her
own right as the Mother of **JAMES ROBERT**
OSTROWSKI, Deceased)
)
FORTUNATA PALOMBO (P1201), in her own
right as the Mother of **FRANK PALOMBO**,
Deceased)
)
MARIE PERRONE (P1202), in her own right as the
Sister of **FRANK PALOMBO**, Deceased)
)
BARBARA POLISAR (P1203), in her own right as
the Sister of **FRANK PALOMBO**, Deceased)
)
JANICE PANSINI (P1204), in her own right, on
behalf of the Minor Children, and as the
Representative of the **ESTATE OF PAUL J.**
PANSINI, Deceased)
)
JOSEPH PANSINI (P1205), in his own right as the
Brother of **PAUL J. PANSINI**, Deceased)
)
LORETTA HALPERT (P1206), in her own right as
the Sister of **PAUL J. PANSINI**, Deceased)
)
JENNIFER PANZELLA (P1207), in her own right
as an Injured Party)
)
SALVATORE PAPASSO (P1208), in his own right
as the Father of **SALVATORE T. PAPASSO**,
Deceased)
)
THERESA PAPASSO (P1209), in her own right as
the Mother of **SALVATORE T. PAPASSO**,
Deceased)
)
MARIA I. PELLOTT (P1210), in her own right as an
Injured Party)
)
TAMMY PERCONTI (P1211), in her own right, on
behalf of the Minor Child, and as the Representative
of the **ESTATE OF JON A. PERCONTI**,
Deceased)
)
LUCIA PERCONTI (P1212), in her own right as the
Mother of **JON A. PERCONTI**, Deceased)
)

STEVEN PEREZ (P1213), in his own right as an Injured Party)
RUBEN PIMENTEL (P1214), in his own right as an Injured Party)
DOUGLAS PINTO (P1215), in his own right, on behalf of the Minor Children, and as the Representative of the **ESTATE OF SUSAN PINTO**, Deceased)
FRANCIS PAUL PURSLEY (P1216), in his own right as an Injured Party)
JAMES DUNNE, III (P1217), in his own right and as the Representative of the **ESTATE OF CHRISTOPHER QUACKENBUSH**, Deceased)
ANTONIO QUINONES (P1218), in his own right as an Injured Party)
CARMEN QUINONES (P1219), in her own right as an Injured Party)
GODWIN QUINONES (P1220), in his own right as an Injured Party)
ED RADBURN (P1221), in his own right and as the Representative of the **ESTATE OF BETTY BROWNE RADBURN**, Deceased)
DANNY RAGAGLIA (P1222), in his own right as the Brother of **LEONARD J. RAGAGLIA**, Deceased)
PAUL RAGAGLIA (P1223), in his own right as the Brother of **LEONARD J. RAGAGLIA**, Deceased)
LAUREN RAGAGLIA (P1224), in her own right as the Sister of **LEONARD J. RAGAGLIA**, Deceased)
COLLEEN RAGAGLIA (P1225), in her own right as the Sister of **LEONARD J. RAGAGLIA**, Deceased)
DEBRA RAGAGLIA (P1226), in her own right as the Sister of **LEONARD J. RAGAGLIA**, Deceased)
CHRISTINE DURANTE (P1227), in her own right)

as the Sister of **LEONARD J. RAGAGLIA**,)
Deceased)
))
JANICE PUCCIARELLI (P1228), in her own right)
as the Sister of **LEONARD J. RAGAGLIA**,)
Deceased)
))
MAUREEN SCPARTA (P1229), in her own right as)
the Sister of **LEONARD J. RAGAGLIA**, Deceased)
))
ALFONSO RAMOS (P1230), in his own right as an)
Injured Party)
))
EILEEN REGAN (P1231), in her own right as the)
Sister of **DONALD REGAN**, Deceased)
KATHIE REGAN DEY (P1232), in her own right as)
the Sister of **DONALD REGAN**, Deceased)
))
REGINA REILLY MADIGAN (P1233), in her own)
right as the Sister of **KEVIN O. REILLY**,)
Deceased)
))
FERNANDO REYES (P1234), in his own right as)
an Injured Party)
))
ADELMA REYES NIEVES (P1235), in her own)
right as the Sister of **GLORIA REYES**, Deceased)
))
JOHN J. ROBERTS (P1236), in his own right and)
as the Representative of the **ESTATE OF**)
MICHAEL EDWARD ROBERTS, Deceased)
))
VERONICA ROBERTS (P1237), in her own right)
as the Mother of **MICHAEL EDWARD**)
ROBERTS, Deceased)
))
KAREN E. ROBERTS (P1238), in her own right as)
the Sister of **MICHAEL EDWARD ROBERTS**,)
Deceased)
))
ABIMAELO RODRIGUEZ (P1239), in her own right)
as an Injured Party)
))
CARLOTA RODRIGUEZ DECASTILLO)
(P1240), in her own right as an Injured Party)
))
MIRIAM RODRIGUEZ (P1241), in her own right)
as an Injured Party)
))
ROSEMARY ROMA (P1242), in her own right as)

the Mother of **KEITH ROMA**, Deceased)
)
PATRICIA ROSEN (P1243), in her own right, on)
 behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF MARK H.)
 ROSEN**, Deceased)
)
ARTHUR RUSSO (P1244), in his own right as the)
 Father of **WAYNE A. RUSSO**, Deceased)
)
ARLENE RUSSO (P1245), in her own right as the)
 Mother of **WAYNE A. RUSSO**, Deceased)
)
)
BRUCE D. SABER (P1246), in his own right and as)
 the Representative of the **ESTATE OF SCOTT)
 SABER**, Deceased)
)
ELAINE SABER (P1247), in her own right as the)
 Mother of **SCOTT SABER**, Deceased)
)
SILVERIA SEGURA (P1248), in her own right, and)
 on behalf of the Minor Children of **JUAN SALAS**,)
 Deceased)
)
CAROL SUE SANDLER (P1249), in her own right)
 and as the Representative of the **ESTATE OF)
 HERMAN S. SANDLER**, Deceased)
)
LUIS SANTIAGO (P1250), in his own right as an)
 Injured Party)
)
ELLIOT SCHEINBERG (P1251), in his own right)
 and as the Representative of the **ESTATE OF)
 ANGELA SUSAN SCHEINBERG**, Deceased)
)
KARL H. SCHMIDT (P1252), in his own right and)
 as the Co-Representative of the **ESTATE OF)
 KAREN HELENE SCHMIDT**, Deceased)
)
LAUREN J. OSNATO (P1253), in her own right)
 and as the Co-Representative of the **ESTATE OF)
 KAREN HELENE SCHMIDT**, Deceased)
)
DAWN M. SHAY (P1254), in her own right, on)
 behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF ROBERT J.)
 SHAY, JR.**, Deceased)
)
 _____)

ROBERT J. SHAY, SR. (P1255), in his own right as the Father of **ROBERT J. SHAY, JR.**, Deceased)
)
MAUREEN SHAY (P1256), in her own right as the Mother of **ROBERT J. SHAY, JR.**, Deceased)
)
JAMES SHAY (P1257), in his own right as the Brother of **ROBERT J. SHAY, JR.**, Deceased)
)
MICHAEL A. SHAY (P1258), in his own right as the Brother of **ROBERT J. SHAY, JR.**, Deceased)
)
EILEEN SHAY (P1259), in her own right as the Sister of **ROBERT J. SHAY, JR.**, Deceased)
)
LEANNE SHAY (P1260), in her own right as the Sister of **ROBERT J. SHAY, JR.**, Deceased)
)
KATHLEEN SHAY (P1261), in her own right as the Sister of **ROBERT J. SHAY, JR.**, Deceased)
)
MAUREEN SURKO (P1262), in her own right as the Sister of **ROBERT J. SHAY, JR.**, Deceased)
)
CAROLYN SHAY (P1263), in her own right as the Sister of **ROBERT J. SHAY, JR.**, Deceased)
)
DOV SHEFI (P1264), in his own right as the Father of **HAGAY SHEFI**, Deceased)
)
ESTHER SHEFI (P1265), in her own right as the Mother of **HAGAY SHEFI**, Deceased)
)
YISHAI SHEFI (P1266), in his own right as the Brother of **HAGAY SHEFI**, Deceased)
)
PAZIT SHEFI BAUM (P1267), in her own right as the Sister of **HAGAY SHEFI**, Deceased)
)
KATHLEEN H. SIMMONS (P1268), in her own right and as the Representative of the **ESTATE OF BRUCE E. SIMMONS**, Deceased)
)
EILEEN HEATHER SIMON (P1269), in her own right, on behalf of the Minor Children, and as the Representative of the **ESTATE OF MICHAEL JOHN SIMON**, Deceased)
)
LINDA SIMS (P1270), in her own right as an Injured Party)
)

BLANCHE STEEN (P1271), in her own right and as
the Representative of the **ESTATE OF ERIC
THOMAS STEEN**, Deceased

GEORGE D. STEEN, II (P1272), in his own right
as the Brother of **ERIC THOMAS STEEN**,
Deceased

GEORGE STERGIPOULOS, M.D. (P1273), in
his own right and as the Co-Representative of the
ESTATE OF ANDREW STERGIPOULOS,
Deceased

ANGELA STERGIPOULOS (P1274), in her own
right and as the Co-Representative of the **ESTATE
OF ANDREW STERGIPOULOS**, Deceased

GEORGE STERGIPOULOS, JR. (P1275), in his
own right as the Brother of **ANDREW
STERGIPOULOS**, Deceased

KATHLEEN STERGIPOULOS (P1276), in her
own right as the Sister of **ANDREW
STERGIPOULOS**, Deceased

DANIEL M. STRAINE (P1277), in his own right as
the Brother of **JAMES J. STRAINE, JR.**,
Deceased

MICHAEL STRAINE (P1278), in his own right as
the Brother of **JAMES J. STRAINE, JR.**,
Deceased

ETHAN STRAUSS (P1279), in his own right as an
Injured Party

JIN ARK TAM (P1280), in his own right as the
Father of **MAURITA TAM**, Deceased

ANA TEMPESTA (P1281), in her own right and as
the Representative of the **ESTATE OF ANTHONY
TEMPESTA**, Deceased

MICHAEL TEMPESTA (P1282), in his own right
as the Brother of **ANTHONY TEMPESTA**,
Deceased

JACKLYN TEMPLE (P1283), in her own right as the Sister of **DOROTHY TEMPLE**, Deceased)
LARRY TEMPLE (P1284), in his own right as the Brother of **DOROTHY TEMPLE**, Deceased)
WILLIE TEMPLE (P1285), in his own right as the Brother of **DOROTHY TEMPLE**, Deceased)
LOUIS TEMPLE (P1286), in his own right as the Brother of **DOROTHY TEMPLE**, Deceased)
KATHLEEN TIGHE (P1287), in her own right, on behalf of the Minor Children, and as the Representative of the **ESTATE OF STEPHEN E. TIGHE**, Deceased)
TIMOTHY J. TIGHE (P1288), in his own right as the Brother of **STEPHEN E. TIGHE**, Deceased)
ROBERTA L. SHEA (P1289), in her own right as the Sister of **STEPHEN E. TIGHE**, Deceased)
JANE M. O'DEA (P1290), in her own right as the Sister of **STEPHEN E. TIGHE**, Deceased)
LOUIS TORRES (P1291), in his own right as an Injured Party)
HADIDJATOU TRAORE (P1292), in her own right as the Wife of **ABDOUL KARIM TRAORE**, Deceased)
SHARON B. SCHULTZ (P1293), in her own right and as the Representative of the **ESTATE OF KARAMO TRERRA**, Deceased)
ROSA CAICEDO (P1294), in her own right, and on behalf of the Minor Children of **DAVID VARGAS**, Deceased)
CATHERINE PEDERSEN (P1295), in her own right and as the Representative of the **ESTATE OF LORETTA A. VERO**, Deceased)
MARION PAOLO (P1296), in her own right as the Mother of **LORETTA A. VERO**, Deceased)
JAMES J. WALSH (P1297), in his own right and as)

the Representative of the **ESTATE OF BARBARA P. WALSH**, Deceased)
)
ALLISON A. DIMARZIO (P1298), in her own right)
 as the Daughter of **BARBARA P. WALSH**,)
 Deceased)
JENNIFER L. LANDSTROM (P1299), in her own)
 right as the Daughter of **BARBARA P. WALSH**,)
 Deceased)
EARNEST WASHINGTON, JR. (P1300), in his)
 own right as the Father of **DERRICK)
 CHRISTOPHER WASHINGTON**, Deceased)
LETTIE WASHINGTON (P1301), in her own right)
 as the Mother of **DERRICK CHRISTOPHER)
 WASHINGTON**, Deceased)
KEISHA WASHINGTON (P1302), in her own right)
 and on behalf of the Minor Children of **DERRICK)
 CHRISTOPHER WASHINGTON**, Deceased)
BRANDON WASHINGTON (P1303), in his own)
 right as the Brother of **DERRICK)
 CHRISTOPHER WASHINGTON**, Deceased)
TRACEY WASHINGTON (P1304), in his own)
 right as the Brother of **DERRICK)
 CHRISTOPHER WASHINGTON**, Deceased)
MATTHEW WEST (P1305), in his own right as the)
 Son of **PETER M. WEST**, Deceased)
VALRIE M. WILLIAMS (P1306), in her own right)
 as the Mother of **CROSSLEY WILLIAMS, JR.**,)
 Deceased)
LINDA WOODWELL (P1307), in her own right)
 and as the Representative of the **ESTATE OF)
 RICHARD H. WOODWELL**, Deceased)
JOHN KNOWLES WOODWELL, III (P1308), in)
 his own right as the Brother of **RICHARD H.)
 WOODWELL**, Deceased)
PAMELA WOODWELL GEERDES (P1309), in)
 her own right as the Sister of **RICHARD H.)
 WOODWELL**, Deceased)
MARTHA WRIGHT (P1310), in her own right and)

as the Representative of the **ESTATE OF JOHN**)
WAYNE WRIGHT, III, Deceased)
))
CHRISTOPHER YOUNG (P1311), in his own right)
as an Injured Party)
))
ROBERT RAMOS (P1312), in his own right as an)
Injured Party)
))
FATHER DOE # 8 (AP128), in his own right as the)
Father of **DECEDENT DOE # 8**, Deceased)
))
MOTHER DOE # 8 (AP129), in her own right as the)
Mother of **DECEDENT DOE # 8**, Deceased)
))
SISTER DOE # 8 (AP130), in her own right as the)
Sister of **DECEDENT DOE # 8**, Deceased)
))
SISTER DOE # 8 (AP131), in her own right as the)
Sister of **DECEDENT DOE # 8**, Deceased)
))
SPOUSE DOE # 46 (AP132), in his own right as the)
Husband of **DECEDENT DOE # 46**, Deceased)
))
SPOUSE DOE # 61 (AP133), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF DECEDENT**)
DOE # 61, Deceased)
))
SPOUSE DOE # 62 (AP134), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF DECEDENT**)
DOE # 62, Deceased)
))
DAUGHTER DOE # 63 (AP135), in her own right)
as the Daughter of **DECEDENT DOE # 63**,)
Deceased)
))
SPOUSE DOE # 64 (AP136), in her own right and as)
the Representative of the **ESTATE OF**)
DECEDENT DOE # 64, Deceased)
))
SPOUSE DOE # 65 (AP137), in his own right, on)
behalf of the Minor Child, and as the Representative)
of the **ESTATE OF DECEDENT DOE # 65**,)
Deceased)
))
SPOUSE DOE # 66 (AP138), in her own right as the)
Wife of **DECEDENT DOE # 66**, Deceased)
))

))

SPOUSE DOE # 67 (AP139), in her own right and as)
the Representative of the **ESTATE OF**)
DECEDENT DOE # 67, Deceased)
)
SPOUSE DOE # 68 (AP140), in her own right and as)
the Representative of the **ESTATE OF**)
DECEDENT DOE # 68, Deceased)
)
SPOUSE DOE # 69 (AP141), in her own right and as)
the Representative of the **ESTATE OF**)
DECEDENT DOE # 69, Deceased)
)
SPOUSE DOE # 70 (AP142), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF DECEDENT**)
DOE # 70, Deceased)
)
)
SPOUSE DOE # 71, (AP143), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF DECEDENT**)
DOE # 71, Deceased)
)
MOTHER DOE # 71, (AP144), in her own right as)
the Mother of **DECEDENT DOE # 71**, Deceased)
)
SISTER DOE # 71, (AP145), in her own right as the)
Sister of **DECEDENT DOE # 71**, Deceased)
)
SISTER DOE # 71, (AP146), in her own right as the)
Sister of **DECEDENT DOE # 71**, Deceased)
)
SISTER DOE # 71, (AP147), in her own right as the)
Sister of **DECEDENT DOE # 71**, Deceased)
)
SISTER DOE # 71, (AP148), in her own right as the)
Sister of **DECEDENT DOE # 71**, Deceased)
)
JOHN DOE # 72 (AP149), in his own right as an)
Injured Party)
)
SPOUSE DOE # 73 (AP150), in his own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF DECEDENT**)
DOE # 73, Deceased)
)
BROTHER DOE # 74 (AP151), in his own right as)
the Brother of **DECEDENT DOE # 74**, Deceased)
)
SPOUSE DOE # 75 (AP152), in her own right, on)

behalf of the Minor Children, and as the)
Representative of the **ESTATE OF DECEDENT**)
DOE # 75, Deceased)
)
SPOUSE DOE # 76 (AP153), in her own right, on)
behalf of the Minor Child, and as the Representative)
of the **ESTATE OF DECEDENT DOE # 76**,)
Deceased)
)
TWIN-BROTHER DOE # 76 (AP154), in his own)
right as the twin-brother of **DECEDENT DOE #**)
76, Deceased)
)
FATHER DOE # 76 (AP155), in his own right as the)
Father of **DECEDENT DOE # 76**, Deceased)
)
MOTHER DOE # 76 (AP156), in her own right as)
the Mother of **DECEDENT DOE # 76**, Deceased)
BROTHER DOE # 76 (AP157), in his own right as)
the Brother of **DECEDENT DOE # 76**, Deceased)
)
BROTHER DOE # 76 (AP158), in his own right as)
the Brother of **DECEDENT DOE # 76**, Deceased)
)
BROTHER DOE # 76 (AP159), in his own right as)
the Brother of **DECEDENT DOE # 76**, Deceased)
)
BROTHER DOE # 76 (AP160), in his own right as)
the Brother of **DECEDENT DOE # 76**, Deceased)
)
BROTHER DOE # 76 (AP161), in his own right as)
the Brother of **DECEDENT DOE # 76**, Deceased)
)
SISTER DOE # 76 (AP162), in her own right as the)
Sister of **DECEDENT DOE # 76**, Deceased)
)
SISTER DOE # 76 (AP163), in her own right as the)
Sister of **DECEDENT DOE # 76**, Deceased)
)
SISTER DOE # 76 (AP164), in her own right as the)
Sister of **DECEDENT DOE # 76**, Deceased)
)
SISTER DOE # 76 (AP165), in her own right as the)
Sister of **DECEDENT DOE # 76**, Deceased)
)
SISTER DOE # 76 (AP166), in her own right as the)
Sister of **DECEDENT DOE # 76**, Deceased)
)
JANE DOE # 77 (AP167), in her own right as an)
Injured Party)

SISTER DOE # 78 (AP168), in her own right as the)
Sister of **DECEDENT DOE # 78**, Deceased)

FATHER DOE # 79 (AP169), in his own right as the)
Father of **DECEDENT DOE # 79**, Deceased)

SISTER DOE # 80 (AP170), in her own right as the)
Sister of **DECEDENT DOE # 80**, Deceased)

SISTER DOE # 81 (AP171), in her own right as the)
Sister of **DECEDENT DOE # 81**, Deceased)

MOTHER DOE # 82 (AP172), in her own right as)
the Mother of **DECEDENT DOE # 82**, Deceased)

BROTHER DOE # 82 (AP173), in his own right as)
the Brother of **DECEDENT DOE # 82**, Deceased)

BROTHER DOE # 82 (AP174), in his own right as)
the Brother of **DECEDENT DOE # 82**, Deceased)

SISTER DOE # 82 (AP175), in her own right as the)
Sister of **DECEDENT DOE # 82**, Deceased)

SPOUSE DOE # 83 (AP176), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF DECEDENT**)
DOE # 83, Deceased)

THIRD AMENDED PLAINTIFFS)

VANESSA ABREU (P1312), in her own right as an)
Injured Party)

JOHN J. ACERNO (P1313), in his own right as an)
Injured Party)

KEVIN JOHN ADAMS (P1314), in his own right as)
an Injured Party)

AFFIONG ADANGA (P1315), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF IGNATIUS**)
UDO ADANGA, Deceased)

DARRYL J. ADONE (P1316), in his own right as an)
Injured Party)

STACEY AFFLITTO (P1317), in her own right, on)
behalf of the Minor Children, and as the)

Representative of the **ESTATE OF DANIEL**)
THOMAS AFFLITTO, Deceased)
)
VINNIE CARLA AGNELLO (P1318), in her own)
 right and on behalf of the Minor Children of)
JOSEPH AGNELLO, Deceased)
)
SALVATORE AGNELLO (P1319), in his own right)
 as the Father of **JOSEPH AGNELLO**, Deceased)
)
RITA AGNELLO (P1320), in her own right as the)
 Mother of **JOSEPH AGNELLO**, Deceased)
)
ROSARIA MARTINGANO (P1321), in her own)
 right as the Sister of **JOSEPH AGNELLO**,)
 Deceased)
)
JAMES F. ALBACH, JR. (P1322), in his own right)
 as an Injured Party)
)
VINCENT J. ALBANESE (P1323), in his own right)
 as an Injured Party)
)
THOMAS ALBERT (P1324), in his own right as an)
 Injured Party)
)
RONALD ALLEN (P1325), in his own right as an)
 Injured Party)
)
WILLIAM J. ALLINGHAM (P1326), in his own)
 right as the Father of **CHRISTOPHER EDWARD**)
ALLINGHAM, Deceased)
)
PATRICIA C. ALLINGHAM (P1327), in her own)
 right as the Mother of **CHRISTOPHER EDWARD**)
ALLINGHAM, Deceased)
)
WILLIAM J. ALLINGHAM, JR. (P1328), in his)
 own right as the Brother of **CHRISTOPHER**)
EDWARD ALLINGHAM, Deceased)
)
PEGGY ALINGHAM CICCARELLI (P1329), in)
 her own right as the Sister of **CHRISTOPHER**)
EDWARD ALLINGHAM, Deceased)
)
KATHARINE ALLINGHAM CLARK (P1330), in)
 her own right as the Sister of **CHRISTOPHER**)
EDWARD ALLINGHAM, Deceased)
)
 _____)

ROBERT E. ALVERSON (P1331), in his own right)
as an Injured Party)
))
MITCHELL B. AMERBACH (P1332), in his own)
right as an Injured Party)
))
THOMAS ANDERSON (P1333), in his own right as)
an Injured Party)
))
TUTKAJ ANTONIA (P1334), in her own right as an)
Injured Party)
))
IOANNIS ANTONIADIS (P1335), in her own right)
as an Injured Party)
))
CAROL ANN AQUILINO (P1336), in her own)
right as the Mother of **FRANK THOMAS**)
AQUILINO, Deceased)
TARA CHIARI (P1337), in her own right as the)
Sister of **FRANK THOMAS AQUILINO**,)
Deceased)
))
JILL AQUILINO (P1338), in her own right as the)
Sister of **FRANK THOMAS AQUILINO**,)
Deceased)
))
DAVID ARCHBOLD (P1339), in his own right as)
an Injured Party)
))
PETER ARCHER (P1340), in his own right as an)
Injured Party)
))
LORI ANN ARCZYNSKI (P1341), in her own)
right, on behalf of the Minor Children, and as the)
Representative of the **ESTATE OF MICHAEL G.**)
ARCZYNSKI, Deceased)
))
JOSEPH ARIOLA (P1342), in his own right as an)
Injured Party)
))
ELAINE ASCIAK (P1343), in her own right, on)
behalf of the Minor Child, and as the Representative)
of the **ESTATE OF MICHAEL ASCIAK**,)
Deceased)
))
VIVIAN ASCIAK (P1344), in her own right as the)
Mother of **MICHAEL ASCIAK**, Deceased)
))
SHAWN ASHE (P1345), in his own right as an)
Injured Party)
))

JOHN BADAGLIACCA (P1346), in his own right)
 as the Father of **JOHN J. BADAGLIACCA**,)
 Deceased)
GRACE BADAGLIACCA (P1347), in her own)
 right as the Mother of **JOHN J. BADAGLIACCA**,)
 Deceased)
JODI SCOLARO (P1348), in her own right as the)
 Sister of **JOHN J. BADAGLIACCA**, Deceased)
PAUL J. BADER (P1349), in his own right as an)
 Injured Party)
ANATOLIY BAKALINSKIY (P1350), in his own)
 right and as the Representative of the **ESTATE OF**)
TATYANA BAKALINSKAYA, Deceased)
MARINA BAKALINSKAYA (P1351), in her own)
 right as the Daughter of **TATYANA**)
BAKALINSKAYA, Deceased)
NATALIE BAKALINSKAYA (P1352), in her own)
 right as the Daughter of **TATYANA**)
BAKALINSKAYA, Deceased)
ARISTIDES BANTIS (P1353), as the)
 Representative of the **ESTATE OF KATHERINE**)
BANTIS, Deceased)
EVANGELOS BANTIS (P1354), in his own right as)
 the Father of **KATHERINE BANTIS**, Deceased)
SOULTANA BANTIS (P1355), in her own right as)
 the Mother of **KATHERINE BANTIS**, Deceased)
GERARD BAPTISTE (P1356), in his own right as)
 the Father of **GERARD BAPTISTE**, Deceased)
CAROL BARAN (P1357), in her own right, on)
 behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF WALTER**)
BARAN, Deceased)
NICHOLAS BARBARO, JR. (P1358), in his own)
 right as the Brother of **PAUL BARBARO**,)
 Deceased)
THOMAS BARBARO (P1359), in his own right as)
 the Brother of **PAUL BARBARO**, Deceased)

JACQUELINE VENEZIA (P1360), in her own
right as the Sister of **PAUL BARBARO**, Deceased)
)
GARRETT BARBOSA (P1361), in his own right as
an Injured Party)
)
THOMAS J. BAROZ (P1362), in his own right as
an Injured Party)
)
BERTRAND BARRY (P1363), in his own right and
as the Co-Representative of the **ESTATE OF**
ARTHUR BARRY, Deceased)
)
AUDRIENE BARRY (P1364), in her own right and
as the Co-Representative of the **ESTATE OF**
ARTHUR BARRY, Deceased)
)
BERTRAND ARTHUR BARRY (P1365), in his
own right as the Brother of **ARTHUR BARRY**,
Deceased)
)
CLARE ELLEN SKARDA (P1366), in her own
right as the Sister of **ARTHUR BARRY**, Deceased)
)
KATHLEEN MEGAN POSS (P1367), in her own
right as the Sister of **ARTHUR BARRY**, Deceased)
)
PATRICIA ANNE COSGROVE (P1368), in her
own right as the Sister of **ARTHUR BARRY**,
Deceased)
)
JOHN T. BARRY (P1369), in his own right as an
Injured Party)
)
PATRICK T. BARRY (P1370), in his own right as
an Injured Party)
)
FRANK BARTON (P1371), in his own right as an
Injured Party)
)
FRIMA KOGAN (P1372), in her own right as the
Mother of **INNA BASIN**, Deceased)
)
FRANK J. BAZZICALUPO (P1373), in his own
right as an Injured Party)
)
LARRY BEALER (P1374), in his own right as an
Injured Party)
)

THEODORE BECK (P1375), in his own right and)
as the Representative of the **ESTATE OF**)
LAWRENCE I. BECK, Deceased)
))
JOHN BELLEW (P1376), in his own right as an)
Injured Party)
))
ANTHONY BELLISARI (P1377), in his own right)
as an Injured Party)
))
SEAN BELLOWS (P1378), in his own right and as)
the Representative of the **ESTATE OF DEBBIE S.**)
BELLOWS, Deceased)
))
DEREK P. BENNETT (P1379), in his own right as)
an Injured Party)
))
IAN BENNETT (P1380), in his own right as an)
Injured Party)
))
GARY BERGER (P1381), in his own right as the)
Brother of **STEVEN HOWARD BERGER**,)
Deceased)
))
JAMES W. BERGHORN (P1382), in his own right)
as an Injured Party)
))
JOSEPH T. BERRY (P1383), in his own right as an)
Injured Party)
))
DONALD A. BETTERLY (P1384), in his own right)
as the Father of **TIMOTHY D. BETTERLY**,)
Deceased)
))
JOAN C. BETTERLY (P1385), in her own right as)
the Mother of **TIMOTHY D. BETTERLY**,)
Deceased)
))
MARK BETTERLY (P1386), in his own right as the)
Brother of **TIMOTHY D. BETTERLY**, Deceased)
))
DONALD BETTERLY, JR. (P1387), in his own)
right as the Brother of **TIMOTHY D.**)
BETTERLY, Deceased)
))
STEPHEN BILESKI (P1388), in his own right as an)
Injured Party)
))
CHRISTOPHER BILOTTI (P1389), in his own)

right as an Injured Party)
)
GERALD W. BINGHAM (P1390), in his own right)
 as the Father of **MARK K. BINGHAM**, Deceased)
)
JAMES A. BITTLES (P1391), in his own right as an)
 Injured Party)
)
DANIEL BIVONA (P1392), in his own right as an)
 Injured Party)
)
ALBERT A. BLACKMAN (P1393), in his own)
 right and as the Co-Representative of the **ESTATE**)
OF ALBERT BLACKMAN, JR., Deceased)
)
HYACINTH BLACKMAN (P1394), in her own)
 right and as the Co-Representative of the **ESTATE**)
OF ALBERT BLACKMAN, JR., Deceased)
DANIEL A. WALISIAK (P1395), in his own right)
 as the Fiancé of **SUSAN L. BLAIR**, Deceased)
)
JAMES BLAKE (P1396), in his own right as an)
 Injured Party)
)
SCOTT BLANEY (P1397), in his own right and as)
 the Representative of the **ESTATE OF JANICE**)
BLANEY, Deceased)
)
STAN BLASKEY (P1398), in his own right as an)
 Injured Party)
)
RICHARD J. BLATUS (P1399), in his own right as)
 an Injured Party)
)
IRA BLAU (P1400), in his own right and as the)
 Representative of the **ESTATE OF RITA BLAU**,)
 Deceased)
)
MICHELE BUFFOLINO (P1401), in her own right)
 as the Daughter of **RITA BLAU**, Deceased)
)
NICOLE EFFRESS (P1402), in her own right as the)
 Daughter of **RITA BLAU**, Deceased)
)
EDWARD P. BOLGER (P1403), in his own right as)
 an Injured Party)
)
JAN BONANZA (P1404), in his own right as an)
 Injured Party)
)
 _____)

FREDERICK BOUCHARD (P1405), in his own right and as the Representative of the **ESTATE OF CAROL BOUCHARD**, Deceased)
HOPE DELLEFEMINE (P1406), in her own right as the Mother of **CAROL BOUCHARD**, Deceased)
KENNETH DELLEFEMINE (P1407), in his own right as the Brother of **CAROL BOUCHARD**, Deceased)
RICHARD DELLEFEMINE (P1408), in his own right and on behalf of the Estate of Frank Dellefemine, the late Father of **CAROL BOUCHARD**, Deceased)
RONALD BOYCE (P1409), in his own right as an Injured Party)
JOHN W. BOYLE (P1410), in his own right as an Injured Party)
JOSEPH M. BOYLE (P1411), in his own right as an Injured Party)
KEVIN BRADBURY (P1412), in his own right as an Injured Party)
GEORGE BRENNAN (P1413), in his own right as an Injured Party)
RAYMOND BRESSINGHAM (P1414), in his own right as an Injured Party)
JEFFREY A. BREZIL (P1415), in his own right as an Injured Party)
JAMES BRIORDY (P1416), in his own right as an Injured Party)
EDWARD M. BROWN (P1417), in his own right as an Injured Party)
ERNEST O. BROWN (P1418), in his own right as an Injured Party)
KEVIN J. BROWN (P1419), in his own right as an Injured Party)
STEPHEN C. BROWN (P1420), in his own right as an Injured Party)

SIGALIT BROWN (P1421), in her own right as the
Wife of **ANDREW C. BRUNN**, Deceased)
)
THOMAS J. BUBELNIK (P1422), in his own right)
as an Injured Party)
)
JONATHAN BUCHSBAUM (P1423), in his own)
right as an Injured Party)
)
CATHERINE MORRISON BUCK (P1424), in her)
own right and as the Representative of the **ESTATE**
OF GREGORY J. BUCK, Deceased)
)
VINCENT BULZOMI (P1425), in his own right as)
an Injured Party)
)
THOMAS BURKE (P1426), in his own right as an)
Injured Party)
)
TIMOTHY J. BURKE (P1427), in his own right as)
an Injured Party)
)
JENNIFER C. BURNS (P1428), in her own right)
and as the Representative of the **ESTATE OF**
KEITH JAMES BURNS, Deceased)
)
MICHAEL R. BURNS (P1429), in his own right as)
an Injured Party)
)
SANDRA BURNSIDE (P1430), in her own right and)
as the Representative of the **ESTATE OF JOHN P.**
BURNSIDE, Deceased)
)
KEVIN BUTLER (P1431), in his own right as an)
Injured Party)
)
ROBERT G. BYRNE, SR. (P1432), in his own right)
as the Father of **PATRICK BYRNE**, Deceased)
)
ANNE BYRNE (P1433), in her own right as the)
Mother of **PATRICK BYRNE**, Deceased)
)
THOMAS BYRNE (P1434), in his own right as the)
Brother of **PATRICK BYRNE**, Deceased)
)
WILLIAM J. BYRNE (P1435), in his own right as)
the Brother of **PATRICK BYRNE**, Deceased)
)

FRANCIS X. BYRNE (P1436), in his own right as)
 the Brother of **PATRICK BYRNE**, Deceased)
)
ROBERT G. BYRNE, JR. (P1437), in his own right)
 as the Brother of **PATRICK BYRNE**, Deceased)
)
GARETT C. BYRNE (P1438), in his own right as)
 the Brother of **PATRICK BYRNE**, Deceased)
)
JUDITH BYRNE (P1439), in her own right as the)
 Sister of **PATRICK BYRNE**, Deceased)
)
JOANNE FINN (P1440), in her own right as the)
 Sister of **PATRICK BYRNE**, Deceased)
)
LOUIE D. CACCHIOLI (P1441), in his own right)
 as an Injured Party)
)
JAMES CADDIGAN (P1442), in his own right as an)
 Injured Party)
)
KEVIN CAHILL (P1443), in his own right as an)
 Injured Party)
)
KEVIN J. CAHILL (P1444), in his own right as an)
 Injured Party)
)
ROSEMARY CAIN (P1445), in her own right and)
 as the Representative of the **ESTATE OF**)
GEORGE C. CAIN, Deceased)
)
MICHAEL CAIN (P1446), in his own right as an)
 Injured Party)
)
WILLIAM CALAHAN (P1447), in his own right as)
 an Injured Party)
)
CHRISTOPHER CALAMIA (P1448), in his own)
 right as an Injured Party)
)
RONALD CALCAGNO (P1449), in his own right)
 as an Injured Party)
)
FERNANDO CAMACHO (P1450), in his own right)
 as an Injured Party)
)
RICHARD CANNAVA (P1451), in his own right)
 and as the Representative of the **ESTATE OF LISA**)
CANNAVA, Deceased)
)
 _____)

WILLIAM CANTRES (P1452), in his own right as)
 an Injured Party)
)
RICHARD A. CAPRONI (P1453), in his own right)
 and as the Representative of the **ESTATE OF**)
RICHARD M. CAPRONI, Deceased)
)
DOLORES CAPRONI (P1454), in her own right as)
 the Mother of **RICHARD M. CAPRONI**,)
 Deceased)
)
MICHAEL CAPRONI (P1455), in his own right as)
 the Brother of **RICHARD M. CAPRONI**,)
 Deceased)
)
CHRISTOPHER CAPRONI (P1456), in his own)
 right as the Brother of **RICHARD M. CAPRONI**,)
 Deceased)
)
LISA CAPRONI (P1457), in her own right as the)
 Sister of **RICHARD M. CAPRONI**, Deceased)
)
RALPH CARDINO (P1458), in his own right as an)
 Injured Party)
)
JEAN CAREY (P1459), in her own right as the Wife)
 of **DENNIS M. CAREY**, Deceased)
)
DENNIS M. CAREY, JR. (P1460), in his own right)
 as the Son of **DENNIS M. CAREY**, Deceased)
)
NICOLE T. CAREY (P1461), in her own right as)
 the Daughter of **DENNIS M. CAREY**, Deceased)
)
ROBERT E. CARLO (P1462), in his own right and)
 as the Representative of the **ESTATE OF**)
MICHAEL SCOTT CARLO, Deceased)
)
ROBERT D. CARLO (P1463), in his own right as)
 the Father of **MICHAEL SCOTT CARLO**,)
 Deceased)
)
PHYLLIS CARLO (P1464), in her own right as the)
 Mother of **MICHAEL SCOTT CARLO**, Deceased)
)
MICHELLE WRIGHT (P1465), in her own right as)
 the Daughter of **SANDRA WRIGHT**)
CARTLEDGE, Deceased)
)
EUGENE J. CARTY (P1466), in his own right as an)

Injured Party)
))
FRANK CASALINO (P1467), in his own right as an Injured Party)
))
VINCENT CASCONO (P1468), in his own right as an Injured Party)
))
MARGARET ANN CASHMAN (P1469), in her own right and as the Representative of the **ESTATE OF WILLIAM CASHMAN**, Deceased)
))
JOSEPH CASTELLANO (P1470), in his own right as an Injured Party)
))
JOHN J. CASTLES (P1471), in his own right as an Injured Party)
))
))
JOHN J. CAWLEY (P1472), in his own right as the Father of **MICHAEL J. CAWLEY**, Deceased)
))
MARGARET M. CAWLEY (P1473), in her own right as the Mother of **MICHAEL J. CAWLEY**, Deceased)
))
ROBERT CERESIA (P1474), in his own right as an Injured Party)
))
JULIA CHAN (P1475), in her own right, on behalf of the Minor Sibling, and as the Representative of the **ESTATE OF CHARLES L. CHAN**, Deceased)
))
JOHN O. CHAN (P1476), in his own right as the Father of **CHARLES L. CHAN**, Deceased)
))
CRAIG A. CHAN (P1477), in his own right as the Brother of **CHARLES L. CHAN**, Deceased)
))
CHRISTOPHER J. CHAN (P1478), in his own right as the Brother of **CHARLES L. CHAN**, Deceased)
))
MATTHEW P. CHAN (P1479), in his own right as the Brother of **CHARLES L. CHAN**, Deceased)
))
MARK A. CHAN (P1480), in his own right as the Brother of **CHARLES L. CHAN**, Deceased)
))
JOSE JAVIER CHAPA (P1481), in his own right)

and as the Representative of the **ESTATE OF**)
ROSEMARY M. CHAPA, Deceased)
)
JULIE CHAPA FIELD (P1482), in her own right as)
 the Daughter of **ROSEMARY CHAPA**, Deceased)
)
ARLENE CHARLES (P1483), in her own right as)
 an Injured Party)
)
VERNON F. CHEVALIER, JR. (P1484), in his)
 own right as the Father of **SWEDE JOSEPH**)
CHEVALIER, Deceased)
)
ARTHUR CHRISTENSEN (P1485), in his own)
 right as an Injured Party)
)
GARY CHRISTENSEN (P1486), in his own right as)
 an Injured Party)
)
CHARLES CHRISTOPHE (P1487), in his own)
 right, on behalf of the Minor Child, and as the)
 Representative of the **ESTATE OF KIRSTEN L.**)
CHRISTOPHE, Deceased)
)
RICHARD CHUNG (P1488), in his own right and)
 as the Representative of the **ESTATE OF WAI C.**)
CHUNG, Deceased)
)
YING KWAN CHUNG (P1489), in his own right as)
 the Father of **WAI C. CHUNG**, Deceased)
)
PUI LIN CHUNG (P1490), in her own right as the)
 Mother of **WAI C. CHUNG**, Deceased)
)
STEVE CHUNG (P1491), in his own right as the)
 Brother of **WAI C. CHUNG**, Deceased)
)
WINNIE YANG (P1492), in her own right as the)
 Sister of **WAI C. CHUNG**, Deceased)
)
JULIE TAM (P1493), in her own right as the Sister)
 of **WAI C. CHUNG**, Deceased)
)
NICHOLAS CICERO, JR. (P1494), in his own)
 right as an Injured Party)
)
THOMAS CINOTTI (P1495), in his own right as an)
 Injured Party)
)
BRIAN CLARKE (P1496), in his own right as an)

Injured Party)
)
JOHN CLARKE (P1497), in his own right as the)
Father of **MICHAEL CLARKE**, Deceased)
)
JOHN CLAVIN (P1498), in his own right as an)
Injured Party)
)
ROBERT COBB (P1499), in his own right as an)
Injured Party)
)
FRANCES M. COFFEY (P1500), in her own right)
and as the Representative of the **ESTATE OF**)
DANIEL M. COFFEY, Deceased)
)
DANIEL D. COFFEY, M.D. (P1501), in his own)
right as the Son of **DANIEL M. COFFEY**,)
Deceased)
)
KEVIN M. COFFEY (P1502), in his own right as)
the Son of **DANIEL M. COFFEY**, Deceased)
)
FRANCES M. COFFEY (P1503), in her own right)
and as the Representative of the **ESTATE OF**)
JASON M. COFFEY, Deceased)
)
KEVIN M. COFFEY (P1504), in his own right as)
the Brother of **JASON M. COFFEY**, Deceased)
)
DANIEL D. COFFEY, M.D. (P1505), in his own)
right as the Brother of **JASON M. COFFEY**,)
Deceased)
)
BRUCE COLLISTER (P1507), in his own right as)
an Injured Party)
)
JOHN A. COLON (P1506), in his own right as an)
Injured Party)
)
GARY K. CONNELLY (P1508), in his own right as)
an Injured Party)
)
THOMAS J. CONNOLLY (P1509), in his own)
right as an Injured Party)
)
WILLIAM V. CONNOLLY (P1510), in his own)
right as an Injured Party)
)
THEODORE COOK (P1511), in his own right as an)
Injured Party)

ANGELA COPPOLA (P1512), in her own right as
the Daughter of **GERARD J. COPPOLA**,
Deceased)
)
)
)
GEORGE J. COPPOLA, JR. (P1513), in his own
right as the Brother of **GERARD J. COPPOLA**,
Deceased)
)
)
)
CAROLINE CORDICE (P1514), in her own right
as the Mother of **ROBERT J. CORDICE**,
Deceased)
)
)
)
PATRICK CORR (P1515), in his own right as an
Injured Party)
)
)
)
STEPHEN CORR (P1516), in his own right as an
Injured Party)
)
)
)
MATHEW CORRIGAN (P1517), in his own right
as an Injured Party)
)
)
)
RALPH CORSINI (P1518), in his own right as an
Injured Party)
)
)
)
SCOTT COWAN (P1519), in his own right as an
Injured Party)
)
)
)
ANDRE COX (P1520), in his own right as an Injured
Party)
)
)
)
DUDLEY COX (P1521), in his own right as an
Injured Party)
)
)
)
STEPHEN A. COX (P1522), in his own right as an
Injured Party)
)
)
)
BRIAN COYLE (P1523), in his own right as an
Injured Party)
)
)
)
JOHN J. COYLE (P1524), in his own right as an
Injured Party)
)
)
)
CRAIG CRICHLOW (P1525), in his own right as
an Injured Party)
)
)
)
MARIA CRIFASI (P1526), in her own right and as
the Representative of the **ESTATE OF LUCIA**
CRIFASI, Deceased)
)
)
)

FRANCESCO CRIFASI (P1527), in his own right)
 as the Brother of **LUCIA CRIFASI**, Deceased)
)
ROBERT H. CRISTADORO (P1528), in his own)
 right as an Injured Party)
)
BRENT G. CROBAK (P1529), in his own right as)
 an Injured Party)
)
LUIS CRUZ (P1530), in his own right as an Injured)
 Party)
)
JAMES J. CSORNY (P1531), in his own right as an)
 Injured Party)
)
DEBORAH L. BARRETT (P1532), in her own right)
 as the Fiancé of **BRIAN T. CUMMINS**, Deceased)
)
)
THOMAS CUNNEEN (P1533), in his own right as)
 an Injured Party)
)
DANIEL CURIA (P1534), in his own right as the)
 Brother of **LAURENCE CURIA**, Deceased)
)
LAWRENCE CURIOLI (P1535), in his own right)
 as the Brother of **PAUL DARIO CURIOLI**,)
 Deceased)
)
LOUIS CURIOLI (P1536), in his own right as the)
 Brother of **PAUL DARIO CURIOLI**, Deceased)
)
EDWARD CUSACK (P1537), in his own right as an)
 Injured Party)
)
PHILIP D'AGOSTINO (P1538), in his own right as)
 an Injured Party)
)
CHRISTOPHER D'AMBROSIO (P1539), in his)
 own right as an Injured Party)
)
NANCY DARIA MARRA (P1540), in her own right)
 and as the Representative of the **ESTATE OF**)
MICHAEL D'AURIA, Deceased)
)
CARMEN D'AURIA (P1541), in his own right as)
 the Father of **MICHAEL D'AURIA**, Deceased)
)
CHRISTINE RINALDI (P1542), in her own right as)
the Sister of **MICHAEL D'AURIA**, Deceased)

JAMES E. D'AVOLIO (P1543), in his own right as an Injured Party)
)
VINCENT D'ORIO (P1544), in his own right as an Injured Party)
)
SHERYL CLARK STOLL (P1545) as the Representative of the **ESTATE OF JASON M. DAHL**, Deceased)
)
JOANNE DALTON (P1546), in her own right as an Injured Party)
)
MARK DAMITZ (P1547), in his own right as an Injured Party)
)
ROGER DANVERS (P1548), in his own right as an Injured Party)
RICHARD DAVAN (P1549), in his own right as an Injured Party)
)
FELIPE DAVID (P1550), in his own right as an Injured Party)
)
BEVERLY D. DE WITT (P1551), in her own right as an Injured Party)
)
JOHN DEBENEDITTIS (P1552), in his own right as an Injured Party)
)
HENRY DECKER (P1553), in his own right as an Injured Party)
)
KEVIN DEEHAN (P1554), in his own right as an Injured Party)
)
EDWARD J. DEGAETANO (P1555), in his own right as an Injured Party)
)
WARREN DEGEN (P1556), in his own right as an Injured Party)
)
PAUL DELEO (P1557), in his own right as an Injured Party)
)
LILLIAN DELEO (P1558), in her own right as the Mother of **VITO JOSEPH DELEO**, Deceased)
)
MICHAEL DELEO (P1559), in his own right as the)

Brother of **VITO JOSEPH DELEO**, Deceased)
)
AUGUST C. DELORENZO (P1560), in his own)
 right as an Injured Party)
)
TODD C. DEMAYO (P1561), in his own right as an)
 Injured Party)
)
STEPHEN DEMPSEY (P1562), in his own right as)
 an Injured Party)
)
GARY A. DEMRY (P1563), in his own right as an)
 Injured Party)
)
JOHN M. DENEAU (P1564), in his own right as an)
 Injured Party)
)
JOHN M. DEPRIZIO (P1565), in his own right as)
 an Injured Party)
ANTHONY DESIMONE (P1566), in his own right)
 as an Injured Party)
)
JAMES F. DESTASIO (P1567), in his own right as)
 an Injured Party)
)
JOHN DESTEFANO (P1568), in his own right as an)
 Injured Party)
)
KIERNAN B. DETO (P1569), in his own right as an)
 Injured Party)
)
JAMES E. DEVERY (P1570), in his own right as an)
 Injured Party)
)
DAVID DEVITO (P1571), in his own right as an)
 Injured Party)
)
MARIE CIRMIA (P1572), in her own right as the)
 Sister of **DEBRA ANN DI MARTINO**, Deceased)
)
SALVATORE DIBLASI (P1573), in his own right)
 as an Injured Party)
)
LINDA M. DICKINSON (P1574), in her own right)
 as the Wife of **LAWRENCE PATRICK**)
DICKINSON, Deceased)
)
LOISANNE DIEHL (P1575), in her own right, on)
 behalf of the Minor Child, and as the Representative)
 of the **ESTATE OF MICHAEL DIEHL**, Deceased)

JERROLD DIETZ (P1576), in his own right as an Injured Party)
)
SUSAN DIFATO (P1577), in her own right, on behalf of the Minor Children, and as the Representative of the **ESTATE OF JOHN DIFATO**, Deceased)
)
JOHN M. DILILLO (P1578), in his own right as an Injured Party)
)
STEVEN DIMAGGIO (P1579), in his own right as an Injured Party)
)
ANGELA M. GUTERMUTH (P1580), in her own right as the Fiancé of **CHRISTOPHER MORE DINCUFF**, Deceased)
)
MARJORIE A. DITULLIO (P1581), in her own right as the Mother of **DONALD A. DITULLIO**, Deceased)
)
JOANNA M. COOK (P1582), in her own right as the Sister of **DONALD A. DITULLIO**, Deceased)
)
JANICE L. FLEMING (P1584), in her own right as the Sister of **DONALD A. DITULLIO**, Deceased)
)
VINCENT DODD (P1585), in his own right as an Injured Party)
)
SCOTT DOHERTY (P1586), in his own right as an Injured Party)
)
JAMES F. DONOVAN, JR. (P1587), in his own right as an Injured Party)
)
MICHAEL DONOVAN (P1588), in his own right as an Injured Party)
)
MORRIS DORF (P1589), in his own right and as the Representative of the **ESTATE OF STEPHEN SCOTT DORF**, Deceased)
)
ROBERT DORF (P1590), in his own right as the Brother of **STEPHEN SCOTT DORF**, Deceased)
)
JOSEPH DORF (P1591), in his own right as the Brother of **STEPHEN SCOTT DORF**, Deceased)

)
MICHELLE DORF (P1592), in her own right as the)
Sister of **STEPHEN SCOTT DORF**, Deceased)
)
ANN MARIE DORF (P1593), in her own right as)
the Sister of **STEPHEN SCOTT DORF**, Deceased)
)
LINDA SAMMUT (P1594), in her own right as the)
Sister of **STEPHEN SCOTT DORF**, Deceased)
)
KERRI-ANN DOWD (P1595), in her own right as)
the Wife of **THOMAS DOWD**, Deceased)
)
MICHAEL J. DOWLING (P1596), in his own right)
as an Injured Party)
)
HEATHER DOWNEY (P1597), in her own right as)
an Injured Party)
)
EDWARD DOYLE (P1598), in his own right as an)
Injured Party)
)
STEVEN T. DOYLE (P1599), in his own right as an)
Injured Party)
)
DUNCAN DRISCOLL (P1600), in his own right as)
an Injured Party)
)
EUGENE DRURY (P1601), in his own right as an)
Injured Party)
)
ELAINE DUCH (P1602), in her own right as an)
Injured Party)
)
DENNIS G. DUFFY (P1603), in his own right as an)
Injured Party)
)
THOMAS DUFFY (P1604), in his own right and as)
the Co-Representative of the **ESTATE OF**)
GERARD J. DUFFY, Deceased)
)
ROBERT M. DUFFY (P1605), in his own right and)
as the Co-Representative of the **ESTATE OF**)
GERARD J. DUFFY, Deceased)
)
TIMOTHY DUFFY (P1606), in his own right as an)
Injured Party)
)
WILLIAM DUFFY (P1607), in his own right as an)
Injured Party)

MITCHELL DUGGAN (P1608), in his own right
and as the Representative of the **ESTATE OF**
JACKIE SAYEGH DUGGAN, Deceased

KEVIN DUGGAN (P1609), in his own right as an
Injured Party

DARRELL DUNBAR (P1610), in his own right as
an Injured Party

PHILIP DUNCAN (P1611), in his own right as an
Injured Party

THOMAS M. DUNNE (P1612), in his own right as
an Injured Party

MICHAEL DUNPHY (P1613), in his own right as
an Injured Party

FRANCIS B. DURR (P1614), in his own right as an
Injured Party

DOUGLAS EDEL (P1615), in his own right as an
Injured Party

JEFF EHRET (P1616), in his own right as an
Injured Party

ROBERT E. ELFERIS (P1617), in his own right
and as the Representative of the **ESTATE OF**
MICHAEL J. ELFERIS, Deceased

MARY ELFERIS (P1618), in her own right as the
Mother of **MICHAEL J. ELFERIS**, Deceased

JOSEPH ELFERIS (P1619), in his own right as the
Brother of **MICHAEL J. ELFERIS**, Deceased

ROBERT G. ELFERIS (P1620), in his own right as
the Brother of **MICHAEL J. ELFERIS**, Deceased

NANCY CHALMERS (P1621), in her own right as
the Sister of **MICHAEL J. ELFERIS**, Deceased

ELIZABETH WILD (P1622), in her own right as
the Sister of **MICHAEL J. ELFERIS**, Deceased

DUKE A. ELLIS (P1623), in his own right as an
Injured Party

CHRISTIAN ENGLEDRUM (P1624), in his own right as an Injured Party)
)
)
JUSTIN ENZMANN (P1625), in his own right as an Injured Party)
)
)
DAWN ESPOSITO (P1626), in her own right as the Wife of **FRANCIS ESPOSITO**, Deceased)
)
)
GABE ESPOSITO (P1627), in his own right as an Injured Party)
)
)
PATRICIA A. FALLON (P1628), in her own right and as the Representative of the **ESTATE OF JAMIE LYNN FALLON**, Deceased)
)
)
PAUL FANARA (P1629), in his own right as an Injured Party)
)
)
PETER FARR (P1630), in his own right as an Injured Party)
)
)
JOHN S. FARRELL (P1631), in his own right as an Injured Party)
)
)
ANTHONY FARRINGTON (P1632), in his own right as an Injured Party)
)
)
WILLIAM B. FEEHAN (P1633), in his own right and as the Representative of the **ESTATE OF WILLIAM M. FEEHAN**, Deceased)
)
)
JOHN FEEHAN (P1634), in his own right as the Son of **WILLIAM M. FEEHAN**, Deceased)
)
)
ELIZABETH FEEHAN (P1635), in her own right as the Daughter of **WILLIAM M. FEEHAN**, Deceased)
)
)
TARA FEEHAN DAVAN (P1636), in her own right as the Daughter of **WILLIAM M. FEEHAN**, Deceased)
)
)
RUSSELL FELICIANO (P1637), in his own right as an Injured Party)
)
)
STEPHEN P. FENLEY (P1638), in his own right as an Injured Party)
)
)
CHRISTOPHER M FENYA (P1639), in his own)

right as an Injured Party)
)
FRANK FERDINANDI (P1640), in his own right as)
 an Injured Party)
)
NUNO FERNANDES (P1641), in his own right as)
 an Injured Party)
)
LARISSA FERNANDEZ (P1642), in her own right)
 as an Injured Party)
)
ROGER FERNANDEZ (P1643), in his own right as)
 an Injured Party)
)
MICHAEL FERRARA (P1644), in his own right as)
 an Injured Party)
)
DOUGLAS FERRETTI (P1645), in his own right as)
 an Injured Party)
GERARD FERRIN (P1646), in his own right as an)
 Injured Party)
)
ROBERT J. FIALKO (P1647), in his own right and)
 as the Co-Representative of the **ESTATE OF**)
JENNIFER L. FIALKO, Deceased)
)
EVELYN L. FIALKO (P1648), in her own right and)
 as the Co-Representative of the **ESTATE OF**)
JENNIFER L. FIALKO, Deceased)
)
ANDREW C. FIALKO (P1649), in his own right as)
 the Brother of **JENNIFER L. FIALKO**, Deceased)
)
JOHN FINAMORE (P1650), in his own right as an)
 Injured Party)
)
JOSEPH P. FINLEY (P1651), in his own right as an)
 Injured Party)
)
MICHAEL FINNEGAN (P1652), in his own right)
 as an Injured Party)
)
TERENCE P. FINNERAN (P1653), in his own)
 right as an Injured Party)
)
VICTOR J. FIORELLA (P1654), in his own right)
 as an Injured Party)
)
JEAN C. FISCHER (P1655), in her own right, on)
behalf of the Minor Children, and as the)

Representative of the **ESTATE OF JOHN R. FISCHER**, Deceased)
)
JAY F. FISCHLER (P1656), in his own right as an Injured Party)
)
STEPHEN FISH (P1657), in his own right as an Injured Party)
)
NEIL C. FITZPATRICK (P1658), in his own right as an Injured Party)
)
ZACHARY H. FLETCHER (P1659), in his own right as an Injured Party)
)
LILA MAY WALKDEN FLOUNDERS (P1660), in her own right and as the Representative of the **ESTATE OF JOSEPH W. FLOUNDERS**, Deceased)
CHRISTIAN C. CRONER (P1661), in his own right and as the Representative of the **ESTATE OF PATRICIA V. FLOUNDERS**, Deceased)
)
PATRICK FLYNN (P1662), in his own right as an Injured Party)
)
DEBORAH FODOR (P1663), in her own right, on behalf of the Minor Child, and as the Representative of the **ESTATE OF MICHAEL N. FODOR**, Deceased)
)
MICHAEL FODOR (P1664), in his own right as the Son of **MICHAEL N. FODOR**, Deceased)
)
ANDREW FODOR (P1665), in his own right as the Son of **MICHAEL N. FODOR**, Deceased)
)
JUDITH FODOR (P1666), in her own right as the Sister of **MICHAEL N. FODOR**, Deceased)
)
FREDERICK J. FORD (P1667), in his own right as an Injured Party)
)
MARY GRACE FOTI (P1668), in her own right, on behalf of the Minor Child, and as the Representative of the **ESTATE OF ROBERT FOTI**, Deceased)
)
MICHAEL J. FOX (P1669), in his own right as the Brother of **JEFFREY L. FOX**, Deceased)
)

MICHAEL A. FRANCESE (P1670), in his own right as an Injured Party)
)
STANLEY FREEDNER (P1671), in his own right as an Injured Party)
)
DENNIS FREYRE (P1672), in his own right as an Injured Party)
)
ROBERT FRONER (P1673), in his own right as an Injured Party)
)
DANIEL FUCELLA (P1674), in his own right as an Injured Party)
)
STEVEN FUCILE (P1675), in his own right as an Injured Party)
)
PAUL P. FUSARO (P1676), in his own right as an Injured Party)
)
PHILIP GAETANI (P1677), in his own right as an Injured Party)
)
KEVIN GAFF (P1678), in his own right and as the Representative of the **ESTATE OF PAMELA LEE GAFF**, Deceased)
)
MICHAEL D. GAGER (P1679), in his own right as an Injured Party)
)
PATRICIA A. HILL (P1680), in her own right as the Sister of **IRVING VINCENT GAILLIARD**, Deceased)
)
GIOVANNI GALANTE (P1681), in his own right and as the Representative of the **ESTATE OF GRACE GALANTE**, Deceased)
)
FRANCESCO SUSCA (P1682), in his own right as the Father of **GRACE GALANTE**, Deceased)
)
LUCREZIA SUSCA (P1683), in her own right as the Mother of **GRACE GALANTE**, Deceased)
)
FRANK SUSCA (P1684), in his own right as the Brother of **GRACE GALANTE**, Deceased)
)
CATHY CAVA (P1685), in her own right as the)

Sister of **GRACE GALANTE**, Deceased)
)
BRIAN J. GALLAGHER (P1686), in his own right)
 as an Injured Party)
)
JOHN GALLAGHER (P1687), in his own right as)
 an Injured Party)
)
KEVIN P. GALLAGHER (P1688), in his own right)
 as an Injured Party)
)
TERENCE GALLAGHER (P1689), in his own)
 right as an Injured Party)
)
CHARLES GARBARINI (P1690), in his own right)
 as the Father of **CHARLES GARBARINI**,)
 Deceased)
)
VIRGINIA GARBARINI (P1691), in her own right)
 as the Mother of **CHARLES GARBARINI**,)
 Deceased)
)
RICHARD GARBARINI (P1692), in his own right)
 as the Brother of **CHARLES GARBARINI**,)
 Deceased)
)
PEGGY GARBARINI (P1693), in her own right as)
 the Sister of **CHARLES GARBARINI**, Deceased)
)
CATHY KOSTIW (P1694), in her own right as the)
 Sister of **CHARLES GARBARINI**, Deceased)
)
BERYL ZAWATSKY (P1695), in her own right as)
 the Sister of **CHARLES GARBARINI**, Deceased)
)
JOAN CUNEO (P1696), in her own right as the)
 Sister of **CHARLES GARBARINI**, Deceased)
)
JANET ARBUISO (P1697), in her own right as the)
 Sister of **CHARLES GARBARINI**, Deceased)
)
DONNA GARBARINI (P1698), in her own right as)
 the Sister of **CHARLES GARBARINI**, Deceased)
)
DEBORAH A. GARCIA (P1699), in her own right,)
 on behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF DAVID**)
GARCIA, Deceased)
)
 _____)

LAWRENCE J. GARDA (P1700), in his own right)
as an Injured Party)
))
JILL A. GARTENBERG (P1701), in her own right,)
on behalf of the Minor Children, and as the)
Representative of the **ESTATE OF JAMES M.**)
GARTENBERG, Deceased)
))
BRENDAN GEBERT (P1702), in his own right as)
an Injured Party)
))
JOHN D. GENNOSA (P1703), in his own right as)
an Injured Party)
))
ROMAN GERTSBERG (P1704), in his own right)
and as the Representative of the **ESTATE OF**)
MARINA GERTSBERG, Deceased)
))
))
ANNA GERTSBERG (P1705), in her own right as)
the Wife of **MARINA GERTSBERG**, Deceased)
))
GREG GESSNER (P1706), in his own right as an)
Injured Party)
))
DANIEL P. GEYSEN (P1707), in his own right as)
an Injured Party)
))
RONALD GHIRALDI (P1708), in his own right as)
an Injured Party)
))
LOUIS GIACONELLI (P1709), in his own right as)
an Injured Party)
))
THERESA GIAMMONA (P1710), in her own right)
and on behalf of the Minor Children of **VINCENT**)
F. GIAMMONA, Deceased)
))
JOSEPH A. GIAMPA (P1711), in his own right as)
an Injured Party)
))
GARRY GIANNANDREA (P1712), in his own)
right as an Injured Party)
))
J. FREDERICK GIBBON (P1713), in his own right)
and on behalf of the Minor Child of **DEBRA L.**)
GIBBON, Deceased)
))
ZACHARY GIBBON (P1714), in his own right as)
the Son of **DEBRA L. GIBBON**, Deceased)
))

HEATHER GIBBON (P1715), in her own right as
the Daughter of **DEBRA L. GIBBON**, Deceased)
)
MICHAEL J. GIBBONS (P1716), in his own right)
as an Injured Party)
)
JOHN GIEBLER (P1717), in his own right as an)
Injured Party)
)
MARIA ACOSTA (P1718), in her own right as the)
Domestic Partner of **PAUL JOHN GILL**, Deceased)
)
APRIL GINLEY (P1719), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF JOHN F.**)
GINLEY, Deceased)
)
JOHN E. GINTY (P1720), in his own right as an)
Injured Party)
)
THEODORE GODDARD (P1721), in his own right)
as an Injured Party)
)
ALEESE MILLS HARTMANN (P1722), in her)
own right as the Fiancé of **WILLIAM ROBERT**)
GODSHALK, Deceased)
)
RAYMOND GOING (P1723), in his own right as an)
Injured Party)
)
MANNY GONZALEZ (P1724), in his own right as)
an Injured Party)
)
EDWIN J. GORDON (P1725), in his own right as)
an Injured Party)
)
FRANK GORGLINOE (P1726), in his own right as)
an Injured Party)
)
GERARD GORMAN (P1727), in his own right as)
an Injured Party)
)
ANDREW GRAF (P1728), in his own right as an)
Injured Party)
)
CARMEN GRAY (P1729), in her own right as an)
Injured Party)
)

JOSEPH GRAZIANO (P1730), in his own right as)
 an Injured Party)
)
EDMUND J. GREENE (P1731), in his own right as)
 an Injured Party)
)
JAMES GREGORETTI (P1732), in his own right)
 as an Injured Party)
)
VICTORIA BLAKSLEY (P1733), in her own right,)
 on behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF PEDRO**)
GREHAN, Deceased)
)
JAMES T. GRILLO (P1734), in his own right as an)
 Injured Party)
)
MICHAEL GRILLO (P1735), in his own right as an)
 Injured Party)
DAN GROSSI (P1736), in his own right as an)
 Injured Party)
)
ARTHUR GUASTAMACCHIA (P1737), in his)
 own right as an Injured Party)
)
JOHN GUBELLI (P1738), in his own right as an)
 Injured Party)
)
VINCENT A. GUGLIUZZO (P1739), in his own)
 right as an Injured Party)
)
NAOEMI P. GULLICKSON (P1740), in her own)
 right as the Wife of **JOSEPH P. GULLICKSON**,)
 Deceased)
)
JOHN GULOTTA (P1741), in his own right as an)
 Injured Party)
)
KENNETH M. GUNTHER (P1742), in his own)
 right as an Injured Party)
)
PETER S. GUNTHER (P1743), in his own right as)
 an Injured Party)
)
STEVEN GURNICK (P1744), in his own right as an)
 Injured Party)
)
MICHAEL HADDEN (P1745), in his own right as)
 an Injured Party)
)
 _____)

ALEXANDER HAGAN (P1746), in his own right as
 an Injured Party)
)
GLORIA HAGIS (P1747), in her own right and as
 the Representative of the **ESTATE OF STEVEN**
M. HAGIS, Deceased)
)
PAUL V. HALEY (P1748), in his own right as an
 Injured Party)
)
MARY ALICE HALLORAN (P1749), in her own
 right as the Mother of **VINCENT GERARD**
HALLORAN, Deceased)
)
MAUREEN R. HALVORSON (P1750), in her own
 right and as the Representative of the **ESTATE OF**
JAMES D. HALVORSON, Deceased)
)
CYNTHIA SUE SUMNER (P1751), in her own
 right and as the Representative of the **ESTATE OF**
CARL MAX HAMMOND, JR., Deceased)
)
BRYAN T. HANLEY (P1752), in his own right and
 as the Representative of the **ESTATE OF SEAN**
HANLEY, Deceased)
)
THOMAS HANNON (P1753), in his own right and
 as the Representative of the **ESTATE OF DANA**
REY HANNON, Deceased)
)
GAYE HANNON (P1754), in her own right as the
 Mother of **DANA REY HANNON**, Deceased)
)
KYLE HANNON (P1755), in her own right as the
 Sister of **DANA REY HANNON**, Deceased)
)
JOHN H. KIM (P1756), in his own right as the
 Brother of **SUE JU HANSON**, Deceased)
)
GLORIA HARAMIS (P1757), in her own right and
 as the Representative of the **ESTATE OF**
CASSIKIOS G. HARAMIS, Deceased)
)
GEORGE V. HARAMIS (P1758), in his own right
 as the Son of **CASSIKIOS G. HARAMIS**,
 Deceased)
)
JULIA K. HARAMIS (P1759), in her own right as
 the Daughter of **CASSIKIOS G. HARAMIS**,

Deceased)
))
RAJKUMAR HARDEO (P1760), in her own right)
as an Injured Party)
))
CATHERINE HARDING (P1761), in her own right)
as an Injured Party)
))
DARREN C. HARKINS (P1762), in his own right)
as an Injured Party)
))
DEBRA A. HARLIN (P1763), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF DANIEL**)
EDWARD HARLIN, Deceased)
))
WILBUR HARLIN (P1764), in his own right as the)
Father of **DANIEL EDWARD HARLIN**, Deceased)
))
CAROLINE HARLIN (P1765), in her own right as)
the Mother of **DANIEL EDWARD HARLIN**,)
Deceased)
))
JAMES HARLIN (P1766), in his own right as the)
Brother of **DANIEL EDWARD HARLIN**,)
Deceased)
))
ROBERT HARLIN (P1767), in his own right as the)
Brother of **DANIEL EDWARD HARLIN**,)
Deceased)
))
JOAN HARLIN (P1768), in her own right as the)
Sister of **DANIEL EDWARD HARLIN**, Deceased)
))
MARIA A. GALEA (P1769), in her own right and as)
the Representative of the **ESTATE OF FRANCES**)
HAROS, Deceased)
))
NICHOLAS HAROS, JR. (P1770), in his own right)
as the Son of **FRANCES HAROS**, Deceased)
))
ANDREA CALDARELLA (P1771), in her own)
right as the Daughter of **FRANCES HAROS**,)
Deceased)
))
HARVEY L. HARRELL (P1772), in his own right)
as the Father of **HARVEY L. HARRELL**,)
Deceased)
))
MIRIAM F. HARRELL (P1773), in her own right)

as the Mother of **HARVEY L. HARRELL**,)
Deceased)
))
DAVID W. HARRELL (P1774), in his own right as)
the Brother of **HARVEY L. HARRELL**, Deceased)
))
MOLLY DUNE (P1775), in her own right as the)
Sister of **HARVEY L. HARRELL**, Deceased)
))
HARVEY L. HARRELL (P1776), in his own right)
as the Father of **STEPHEN G. HARRELL**,)
Deceased)
))
MIRIAM F. HARRELL (P1777), in her own right)
as the Mother of **STEPHEN G. HARRELL**,)
Deceased)
))
))
DAVID W. HARRELL (P1778), in his own right as)
the Brother of **STEPHEN G. HARRELL**,)
Deceased)
))
MOLLY DUNE (P1779), in her own right as the)
Sister of **STEPHEN G. HARRELL**, Deceased)
))
THOMAS HARRIS (P1780), in his own right as an)
Injured Party)
))
JAMES P. HARTEN (P1781), in his own right as an)
Injured Party)
))
ELIZABETH HATTON (P1782), in her own right,)
on behalf of the Minor Child, and as the)
Representative of the **ESTATE OF TERENCE**)
SEAN HATTON, Deceased)
))
KENNETH R. HATTON (P1783), in his own right)
as the Father of **TERENCE SEAN HATTON**,)
Deceased)
))
GRACE S. HATTON (P1784), in her own right as)
the Mother of **TERENCE SEAN HATTON**,)
Deceased)
))
GRACE S. HATTEN (P1785), in her own right as)
the Sister of **TERENCE SEAN HATTON**,)
Deceased)
))
RAYMOND HAYDEN (P1786), in his own right as)

an Injured Party)
)
JOSEPH HEALY (P1787), in his own right as an)
 Injured Party)
)
DENNIS J. HEEDLES (P1788), in his own right as)
 an Injured Party)
)
JAMES HEEREY (P1789), in his own right as an)
 Injured Party)
)
EUGENE R. HEGHMANN (P1790), in his own)
 right as an Injured Party)
)
JOHN HEIGL (P1791), in his own right as an)
 Injured Party)
)
BRANDON HEMSCHOTT (P1792), in his own)
 right as an Injured Party)
DEBORA HEMSCHOTT (P1793), in her own right)
 and on behalf of the Minor Children of **MARK**)
HEMSCHOTT, Deceased)
)
ROBERT G. HENEY (P1794), in his own right as)
 an Injured Party)
)
JEFFREY HENKEL (P1795), in his own right as an)
 Injured Party)
)
LUCILLE D. HENRY (P1796), in her own right as)
 an Injured Party)
)
ETHEL M. HENRY (P1797), in her own right as the)
 Mother of **WILLIAM HENRY**, Deceased)
)
JAIME VILLALOBOS (P1798), in his own right as)
 the Father of **CLARIBEL HERNANDEZ**,)
 Deceased)
)
CARMEN IRRIZARRY (P1799), in her own right)
 as the Mother of **CLARIBEL HERNANDEZ**,)
 Deceased)
)
MARIBEL TOPALTZAS (P1800), in her own right)
 as the Sister of **CLARIBEL HERNANDEZ**,)
 Deceased)
)
VENANCIO HERNANDEZ (P1801), in his own)
 right as the Father of **NORBERTO**)
HERNANDEZ, Deceased)
)

ALEJANDRINA FELICIANO (P1802), in her own
right as the Mother of **NORBERTO**
HERNANDEZ, Deceased

PABLO LUIS HERNANDEZ (P1803), in his own
right as the Brother of **NORBERTO**
HERNANDEZ, Deceased

WILLIE ALBERTO HERNANDEZ (P1804), in
his own right as the Brother of **NORBERTO**
HERNANDEZ, Deceased

HECTOR LUIS HERNANDEZ (P1805), in his own
right as the Brother of **NORBERTO**
HERNANDEZ, Deceased

ESLYN HERNANDEZ, SR. (P1806), in his own
right as the Brother of **NORBERTO**
HERNANDEZ, Deceased

VENANCIO HERNANDEZ, JR. (P1807), in his
own right as the Brother of **NORBERTO**
HERNANDEZ, Deceased

MIRIAM KHATRI (P1808), in her own right as the
Sister of **NORBERTO HERNANDEZ**, Deceased

LUZ MILAGROS LUNA (P1809), in her own right
as the Sister of **NORBERTO HERNANDEZ**,
Deceased

MERQUIADES DIAZ (P1810), in her own right as
the Sister of **NORBERTO HERNANDEZ**,
Deceased

MARISOL CORREA (P1811), in her own right as
the Sister of **NORBERTO HERNANDEZ**,
Deceased

TODD E.H. HIGLEY (P1812), in his own right as
the Brother of **ROBERT DALE WARREN**
HIGLEY, II, Deceased

MICHAEL R. HIPSMAN (P1813), in his own right
as an Injured Party

GREGG HIRSCHFELD (P1814), in his own right

as an Injured Party)
)
JUDITH HOBSON (P1815), in her own right as the)
Mother of **ROBERT WAYNE HOBSON, III,**)
Deceased)
)
MATTHEW HOBSON (P1816), in his own right as)
the Brother of **ROBERT WAYNE HOBSON, III,**)
Deceased)
)
LAURA J. DECOSTER (P1817), in her own right)
as the Sister of **ROBERT WAYNE HOBSON, III,**)
Deceased)
)
DANIEL HOGAN (P1818), in his own right as an)
Injured Party)
)
VINCENT D. HOGAN (P1819), in his own right as)
an Injured Party)
JOSEPH HOLLAND (P1820), in his own right as)
the Father of **JOSEPH HOLLAND,** Deceased)
)
CLIFFORD HOLLYWOOD (P1821), in his own)
right as an Injured Party)
)
GEORGE HOLZMANN (P1822), in his own right)
as an Injured Party)
)
EMILY HOWELL (P1823), in her own right as the)
Wife of **MICHAEL C. HOWELL,** Deceased)
)
KEVIN M. HOWELL (P1824), in his own right as)
the Son of **MICHAEL C. HOWELL,** Deceased)
)
FAY CAPUTO (P1825), in her own right as the)
Mother of **STEVEN L. HOWELL,** Deceased)
)
DONNA M. HOWELL (P1826), in her own right as)
the Sister of **STEVEN L. HOWELL,** Deceased)
)
GERALD M. HUNT (P1827), in his own right as an)
Injured Party)
)
JOHN HUNT (P1828), in his own right as an Injured)
Party)
)
KENNETH HUTCHINSON (P1829), in his own)
right as an Injured Party)
)
NATALIE CHRISTINA CONNERS (P1830), in)

her own right as the Daughter of **ROBERT**)
JOSEPH HYMEL, Deceased)
))
JAMES A. HYNES (P1831), in his own right as an)
Injured Party)
))
CAROLYNE Y. HYNES (P1832), in her own right)
and on behalf of the Minor Child of **THOMAS**)
EDWARD HYNES, Deceased)
))
FREDERICK J. ILL, III (P1833), in his own right)
as an Injured Party)
))
FREDERICK J. ILL, SR. (P1834), in his own right)
as the Father of **FREDERICK J. ILL, JR.**,)
Deceased)
))
ALICE ILL (P1835), in her own right as the Mother)
of **FREDERICK J. ILL, JR.**, Deceased)
JANE C. ILL (P1836), in her own right as the Sister)
of **FREDERICK J. ILL, JR.**, Deceased)
))
STEVEN INCARNATO (P1837), in his own right)
as an Injured Party)
))
JOSEPH P. INTINTOLI (P1838), in his own right)
as an Injured Party)
))
ERIC IVERSEN (P1839), in his own right as an)
Injured Party)
))
BRENDA JAMES (P1840), in her own right as an)
Injured Party)
))
STEVEN JENKINS (P1841), in his own right as the)
Brother of **JOSEPH JENKINS, JR.**, Deceased)
))
MARC JENSEN (P1842), in his own right as an)
Injured Party)
))
JOHN JOHNSON (P1843), in his own right as an)
Injured Party)
))
HARRY T. JONES, IV (P1844), in his own right)
and as the Representative of the **ESTATE OF**)
ALLISON H. JONES, Deceased)
))
TERRENCE JORDAN (P1845), in his own right as)
an Injured Party)
))

)

LUKE J. JURAIN (P1846), in his own right as an Injured Party)
JOSEPH F. KADILLAC (P1847), in his own right as an Injured Party)
HAROLD T. KAPLAN (P1848), in his own right and as the Representative of the **ESTATE OF DEBORAH H. KAPLAN**, Deceased)
DENNIS KEANE (P1849), in his own right as an Injured Party)
THOMAS KEELING (P1850), in his own right as an Injured Party)
JOHN E. KEENAN (P1851), in his own right as an Injured Party)
JOHN KELLY (P1852), in his own right as an Injured Party)
JOHN KELLY (P1853), in his own right as an Injured Party)
KEVIN KELLY (P1854), in his own right as an Injured Party)
THOMAS J. KELLY (P1855), in his own right as an Injured Party)
WILLIAM C. KELLY (P1856), in his own right as an Injured Party)
RICHARD KENNEY (P1857), in his own right as an Injured Party)
PETER A. KENNY (P1858), in his own right as an Injured Party)
JOHN F. KERSHIS (P1859), in his own right as an Injured Party)
DIANNE KERWIN (P1860), in her own right and on behalf of the Minor Children of **RONALD T. KERWIN**, Deceased)
TAHIRA KHAN (P1860), in her own right and as the Representative of the **ESTATE OF TAIMOUR KHAN**, Deceased)

)
MICHAEL KILLARNEY (P1861), in his own right)
as an Injured Party)
)
EMANUEL KING (P1862), in his own right as an)
Injured Party)
)
PAUL KIRWIN (P1863), in his own right as the)
Father of **GLENN DAVIS KIRWIN**, Deceased)
)
BARBARA KIRWIN (P1864), in her own right as)
the Mother of **GLENN DAVIS KIRWIN**,)
Deceased)
)
MARCI KLEINBERG-BANDELLI (P1865), in her)
own right as the Sister of **ALAN D. KLEINBERG**,)
Deceased)
)
LARRY J. KLINGENER (P1866), in his own right)
as an Injured Party)
RICHARD KOBBE (P1867), in his own right as an)
Injured Party)
)
EDWARD KOHLER (P1868), in his own right as)
an Injured Party)
)
NICHOLAS KOLOSZUK (P1869), in his own right)
as an Injured Party)
)
JOYCE MERCER (P1870), in her own right and as)
the Representative of the **ESTATE OF SCOTT**)
KOPYTKO, Deceased)
)
CHRISTINE KOPYTKO (P1871), in her own right)
as the Sister of **SCOTT KOPYTKO**, Deceased)
)
ROBERT KORFMAN (P1872), in his own right as)
an Injured Party)
)
ARMEN KOROGHLIAN (P1873), in his own right)
as an Injured Party)
)
SUSANNA FERN (P1874), in her own right as the)
Fiancé of **BOJAN KOSTIC**, Deceased)
)
LOIS H. KUMPEL (P1875), in her own right as the)
Mother of **KENNETH B. KUMPEL**, Deceased)
)
KRISTEN KUVEIKIS (P1876), in her own right as)
the Daughter of **THOMAS J. KUVEIKIS**,)

Deceased)
)
SIDNEY KYLE (P1877), in his own right as an)
Injured Party)
)
JOHN J. LAFEMINA (P1878), in his own right as)
an Injured Party)
)
HUI FEN PAN (P1879), in her own right, on behalf)
of the Minor Children, and as the Representative of)
the **ESTATE OF NEIL K. LAI**, Deceased)
)
GEORGE LAMOREAUX (P1880), in his own right)
as an Injured Party)
)
BRIAN LANDAU (P1881), in his own right as an)
Injured Party)
)
JAMES C. LANG (P1882), in his own right as an)
Injured Party)
PAUL P. LANG (P1883), in his own right as an)
Injured Party)
)
GEORGE LANTAY (P1884), in his own right as an)
Injured Party)
)
JAMES LANZA (P1885), in his own right as an)
Injured Party)
)
BRAIN R. LARNEY (P1886), in his own right as an)
Injured Party)
)
JOHN LAROCCHIA (P1887), in his own right as)
an Injured Party)
)
ANTHONY R. LAROSA (P1888), in his own right)
as an Injured Party)
)
PETER LAUDATI (P1889), in his own right as an)
Injured Party)
)
MARIE ANN PAPROCKI (P1890), in her own)
right and as the Representative of the **ESTATE OF**)
DENIS LAVELLE, Deceased)
)
KEVIN LAVELLE (P1891), in his own right as an)
Injured Party)
)
JEANETTE LEAHY (P1892), in her own right as)
the Mother of **JAMES P. LEAHY**, Deceased)

DENISE HENECK (P1893), in her own right as the Sister of **JAMES P. LEAHY**, Deceased)
)
DANIELLE VELLA (P1894), in her own right as the Sister of **JAMES P. LEAHY**, Deceased)
)
MICHELE SAFATLE (P1895), in her own right as the Sister of **JAMES P. LEAHY**, Deceased)
)
BARRY LEE (P1896), in his own right as an Injured Party)
)
LARRY LEE (P1897), in his own right as an Injured Party)
)
MYONG H. LEE (P1898), in his own right and as the Representative of the **ESTATE OF LINDA C. LEE**, Deceased)
)
HYONG O. LEE (P1899), in her own right as the Mother of **LINDA C. LEE**, Deceased)
)
ROBERT LEE (P1900), in his own right as an Injured Party)
)
ROBERT LEONICK (P1901), in his own right as an Injured Party)
)
JEFFREY LEVER (P1902), in his own right as an Injured Party)
)
RONI LEVINE (P1903), in her own right and as the Representative of the **ESTATE OF ROBERT LEVINE**, Deceased)
)
JOSEPH LIBRETTI (P1904), in his own right as the Brother of **DANIEL LIBRETTI**, Deceased)
)
FRANK A. LICAUSI (P1905), in his own right as an Injured Party)
)
SEBASTIANO LICCIARDI (P1906), in his own right as the Father of **RALPH M. LICCIARDI**, Deceased)
)
CARMEL-ANN SULLIVAN (P1907), in her own right as the Sister of **RALPH M. LICCIARDI**, Deceased)
)

CAROLINE LILORE (P1908), in her own right, on)
 behalf of the Minor Child, and as the Representative)
 of the **ESTATE OF CRAIG DAMIAN LILORE**,)
 Deceased)
)
CAROL ANN LINEHAN (P1909), in her own right,)
 on behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF THOMAS V.)
 LINEHAN, JR.**, Deceased)
)
ANTONIO R. LLORET (P1910), in his own right)
 as an Injured Party)
)
DENING LOHEZ (P1911), in her own right and as)
 the Representative of the **ESTATE OF JEROME)
 LOHEZ**, Deceased)
)
ANTHONY P. LOMELI (P1912), in his own right)
 as an Injured Party)
)
CHRISTOPHER V. LONG (P1913), in his own)
 right as an Injured Party)
)
DANIEL LOPUZZO (P1914), in his own right as an)
 Injured Party)
)
BRENDAN P. LOWERY (P1915), in his own right)
 as an Injured Party)
)
JOSEPH LOWNY (P1916), in his own right as an)
 Injured Party)
)
LOUIS LUDWIG (P1917), in his own right as the)
 Father of **LEE CHARLES LUDWIG**, Deceased)
)
LAWRENCE A. LUDWIG (P1918), in his own)
 right as the Brother of **LEE CHARLES LUDWIG**,)
 Deceased)
)
LOUIS LUDWIG, JR. (P1919), in his own right as)
 the Brother of **LEE CHARLES LUDWIG**,)
 Deceased)
)
LUANN MARTIN (P1920), in her own right as the)
 Sister of **LEE CHARLES LUDWIG**, Deceased)
)
EILEEN D. LUGANO (P1921), in her own right and)
 as the Representative of the **ESTATE OF SEAN)
 THOMAS LUGANO**, Deceased)
)
 _____)

EDMUND LUNDER (P1922), in his own right as the Father of **CHRISTOPHER EDMUND LUNDER**, Deceased)
)
MAUREEN C. LUNDER (P1923), in her own right as the Mother of **CHRISTOPHER EDMUND LUNDER**, Deceased)
)
DAVID LUNDER (P1924), in his own right as the Brother of **CHRISTOPHER EDMUND LUNDER**, Deceased)
)
ROSEMARY SERCIA (P1925), in her own right as the Sister of **CHRISTOPHER EDMUND LUNDER**, Deceased)
)
JOHN B. LYNCH, JR. (P1926), in his own right as the Brother of **MICHAEL FRANCIS LYNCH**, Deceased)
)
COLLEEN M. PARIGEN (P1927), in her own right as the Sister of **MICHAEL FRANCIS LYNCH**, Deceased)
)
THOMAS S. LYNCH (P1928), in his own right as an Injured Party)
)
JOHN LYONS (P1929), in his own right as an Injured Party)
)
MICHAEL LYONS (P1930), in his own right as an Injured Party)
)
IRENE LYONS (P1931), in her own right, on behalf of the Minor Child, and as the Representative of the **ESTATE OF PATRICK JOHN LYONS**, Deceased)
)
BRIAN PATRICK LYONS (P1932), in his own right as the Father of **PATRICK JOHN LYONS**, Deceased)
)
PATRICIA LYONS (P1933), in her own right as the Mother of **PATRICK JOHN LYONS**, Deceased)
)
SEAN LYONS (P1934), in his own right as the Brother of **PATRICK JOHN LYONS**, Deceased)
)
BRIAN C. LYONS (P1935), in his own right as the Brother of **PATRICK JOHN LYONS**, Deceased)

KELLY LYONS (P1936), in her own right as the
Sister of **PATRICK JOHN LYONS**, Deceased

KRISTEN LYONS (P1937), in her own right as the
Sister of **PATRICK JOHN LYONS**, Deceased

PETER M. MABANTA (P1938), in his own right as
an Injured Party

NEIL MACINTYRE (P1939), in his own right as an
Injured Party

MAURA MADDEN (P1940), in her own right and
as the Representative of the **ESTATE OF**
RICHARD B. MADDEN, Deceased

THOMAS MAGEE (P1941), in his own right as an
Injured Party

EUGENE S. MAHLSTADT (P1942), in his own
right as an Injured Party

JOSEPH MAHONEY (P1943), in his own right as
an Injured Party

THOMAS MAHONEY (P1944), in his own right as
an Injured Party

DONNA MAHONEY (P1945), in her own right as
the Wife of **WILLIAM J. MAHONEY, JR.**,
Deceased

MICHAEL A. MALER, SR. (P1946), in his own
right as the Father of **ALFRED RUSSELL**
MALER, Deceased

BEVERLY M. MALER (P1947), in her own right as
the Mother of **ALFRED RUSSELL MALER**,
Deceased

KEITH E. MALER (P1948), in his own right as the
Brother of **ALFRED RUSSELL MALER**,
Deceased

PATRICK MALLOY (P1949), in his own right as
an Injured Party

FRANK MALONE (P1950), in his own right as an
Injured Party

JOHN M MALONEY (P1951), in his own right as
an Injured Party)
)
RALPH MANDIA (P1952), in his own right as an
Injured Party)
)
KATHLEEN MANGANO (P1953), in her own right
and as the Representative of the **ESTATE OF**
JOSEPH MANGANO, Deceased)
)
THOMAS MANLEY (P1954), in his own right as an
Injured Party)
)
WAYNE N. MANZIE (P1955), in his own right as
an Injured Party)
)
ELIZABETH KEMMERER (P1956), in her own
right and as the Co-Representative of the **ESTATE**
OF HILDA MARCIN, Deceased)
CAROLE O'HARE (P1957), in her own right and as
the Co-Representative of the **ESTATE OF HILDA**
MARCIN, Deceased)
)
ANTHONY MARINO (P1958), in his own right as
an Injured Party)
)
KATRINA MARINO (P1959), in her own right as
the Wife of **KENNETH MARINO**, Deceased)
)
JESSIE MARIUS (P1960), in her own right as an
Injured Party)
)
DENNIS MARLO (P1961), in his own right and as
the Representative of the **ESTATE OF KEVIN D.**
MARLO, Deceased)
)
ROSEMARY MEYER (P1962), in her own right as
the Mother of **KEVIN D. MARLO**, Deceased)
)
TIMOTHY MARMION (P1963), in his own right
as an Injured Party)
)
ROBERT W. MARSHALL (P1964), in his own
right as an Injured Party)
)
DENNIS MARTIN (P1965), in his own right as an
Injured Party)
)
EDWARD P. MARTIN (P1966), in his own right as)

an Injured Party)
))
MICHAEL G. MARTIN (P1967), in his own right)
as an Injured Party)
))
LISA MARTINI (P1968), in her own right and on)
behalf of the Minor Child of **PAUL RICHARD**)
MARTINI, Deceased)
))
JAMES MASCARELLA (P1969), in his own right)
as an Injured Party)
))
ANTHONY MASTRELLI (P1970), in his own right)
as an Injured Party)
))
PHILIP W. MASTRANDREA, SR. (P1971), in his)
own right as the Father of **PHILIP W.**)
MASTRANDREA, JR., Deceased)
))
))
ROSALIE A. MASTRANDREA (P1972), in her)
own right as the Mother of **PHILIP W.**)
MASTRANDREA, JR., Deceased)
))
))
ROBERT MASTRANDREA (P1973), in his own)
right as the Brother of **PHILIP W.**)
MASTRANDREA, JR., Deceased)
))
))
LYNN MASTRANDREA (P1974), in her own right)
as the Sister of **PHILIP W. MASTRANDREA,**)
JR., Deceased)
))
))
RICHARD A. MATTONE (P1975), in his own right)
as an Injured Party)
))
))
MARGARET MAURO (P1976), in her own right)
and as the Representative of the **ESTATE OF**)
DOROTHY MAURO, Deceased)
))
))
SHAWN MAY (P1977), in his own right as an)
Injured Party)
))
))
THOMAS MAZZA (P1978), in his own right as an)
Injured Party)
))
))
JOHN MCALLISTER (P1979), in his own right as)
an Injured Party)
))
))
JOHN MCANDREWS (P1980), in his own right as)
an Injured Party)

)
JAMES MCANENEY (P1981), in his own right and)
as the Representative of the **ESTATE OF**)
PATRICIA A. MCANENEY, Deceased)
)
MAUREEN B MCARDLE-SCHULMAN (P1982),)
in her own right as an Injured Party)
)
JOSEPH MCAULEY (P1983), in his own right as)
an Injured Party)
)
PAULA M. MCAVOY (P1984), in her own right)
and on behalf of the Minor Children of **JOHN K.**)
MCAVOY, Deceased)
)
PHILOMENA MCAVOY (P1985), in her own right)
as the Mother of **JOHN K. MCAVOY**, Deceased)
)
MICHAEL MCAVOY (P1986), in his own right as)
the Brother of **JOHN K. MCAVOY**, Deceased)
CARL MCBRATNEY, JR. (P1987), in his own)
right as an Injured Party)
)
EDWARD M. MCCALLEN (P1988), in his own)
right as an Injured Party)
)
NATALIE M. MCCANN (P1989), in her own right)
as the Mother of **THOMAS J. MCCANN**,)
Deceased)
)
GEORGE G. MCCANN (P1990), in his own right)
as the Brother of **THOMAS J. MCCANN**,)
Deceased)
)
NATALIE MORIARTY (P1991), in her own right)
as the Sister of **THOMAS J. MCCANN**, Deceased)
)
DAN MCCARVILL (P1992), in his own right as an)
Injured Party)
)
TIMOTHY MCCARVILL (P1993), in his own)
right as an Injured Party)
)
MICHAEL MCCLELLAND (P1994), in his own)
right as an Injured Party)
)
DENNIS MCCONVILLE (P1995), in his own right)
as an Injured Party)
)
CHARLES MCCORMACK (P1996), in his own)

right as an Injured Party)
))
MARIANNE MCCORMACK (P1997), in her own)
right as an Injured Party)
))
RICHARD G MCCOY (P1998), in his own right as)
an Injured Party)
))
ARTHUR MCCROSSEN (P1999), in his own right)
as an Injured Party)
))
JAMES P. MCDERMOTT (P2000), in his own)
right as an Injured Party)
))
ANN CLAIRE MCDONNELL (P2001), in her own)
right as the Mother of **BRIAN MCDONNELL**,)
Deceased)
))
))
ROBERT MCDONNELL (P2002), in his own right)
as the Brother of **BRIAN MCDONNELL**,)
Deceased)
))
KEVIN MCDONNELL (P2003), in his own right as)
the Brother of **BRIAN MCDONNELL**, Deceased)
))
ALICIA ARANCIBIA (P2004), in her own right as)
the Sister of **BRIAN MCDONNELL**, Deceased)
))
CHERYL MCDONNELL (P2005), in her own)
right, on behalf of the Minor Children, and as the)
Representative of the **ESTATE OF MICHAEL P.**)
MCDONNELL, Deceased)
))
DAVID J. MCDONOUGH (P2006), in his own)
right as an Injured Party)
))
GREGORY MCFARLAND (P2007), in his own)
right as an Injured Party)
))
KEVIN MCGEARY (P2008), in his own right as an)
Injured Party)
))
LAWRENCE G. MCGEE (P2009), in his own right)
as an Injured Party)
))
STEPHEN MCGEE (P2010), in his own right as an)
Injured Party)
))

)

JON J. MCGILLICK (P2011), in his own right as)
 an Injured Party)
)
WILLIAM C. MCGINLY (P2012), in his own right)
 and as the Representative of the **ESTATE OF**)
MARK RYAN MCGINLY, Deceased)
)
PATRICIA D. MCGINLY (P2013), in her own)
 right as the Mother of **MARK RYAN MCGINLY**,)
 Deceased)
)
SEAN M. MCGINLY (P2014), in his own right as)
 the Brother of **MARK RYAN MCGINLY**,)
 Deceased)
)
ANDREW M. MCGINLY (P2015), in his own right)
 as the Brother of **MARK RYAN MCGINLY**,)
 Deceased)
)
JOSEPH MCGOVERN (P2016), in his own right as)
 an Injured Party)
)
THOMAS F. MCGRADE (P2017), in his own right)
 as an Injured Party)
)
PATRICK J. MCGREEN (P2018), in his own right)
 as an Injured Party)
)
JOSEPH F. MCGRORY (P2019), in his own right)
 as an Injured Party)
)
DANIEL M. MCGUINN (P2020), in his own right)
 as an Injured Party)
)
JAMES MCGUIRE (P2021), in his own right as an)
 Injured Party)
)
JOHN F. MCGURREN (P2022), in his own right as)
 an Injured Party)
)
UNA M. MCHUGH (P2023), in her own right, on)
 behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF DENNIS**)
PATRICK MCHUGH, Deceased)
)
JOHN J. MCKENNA (P2024), in his own right as)
 an Injured Party)
)
RICHARD D. MCKENNA (P2025), in his own)

right as an Injured Party)
))
EUGENE MCKENNA (P2026), in his own right as)
the Father of **STEPHANIE MCKENNA**, Deceased)
))
AGNES MCKENNA (P2027), in her own right as)
the Mother of **STEPHANIE MCKENNA**,)
Deceased)
))
MARTIN MCKEON (P2028), in his own right as an)
Injured Party)
))
JAMES MCLOUGHLIN (P2029), in his own right)
as an Injured Party)
))
KEVIN M. MCLOUGHLIN (P2030), in his own)
right as an Injured Party)
))
JOHN SPROHA (P2031)as the Co-Representative)
of the **ESTATE OF GAVIN MCMAHON**,)
Deceased)
MAUREEN SPROHA (P2032)as the Co-)
Representative of the **ESTATE OF GAVIN**)
MCMAHON, Deceased)
))
GERARD F. MCMAHON (P2033), in his own right)
as an Injured Party)
))
KATHERINE MCNEAL (P2034), in her own right)
and as the Representative of the **ESTATE OF**)
DANIEL W. MCNEAL, Deceased)
))
KEVIN MCQUILLY (P2035), in his own right as an)
Injured Party)
))
ERNEST MEDAGLIA (P2036), in his own right as)
an Injured Party)
))
DONALD MEEG (P2037), in his own right as an)
Injured Party)
))
RAMON MELENDEZ (P2038), in his own right as)
the Husband of **MARY MELENDEZ**, Deceased)
))
KERRI ANN MENDEZ (P2039), in her own right)
as the Wife of **CHARLES MENDEZ**, Deceased)
))
JOSEFINA MENDEZ (P2040), in her own right as)
an Injured Party)
))

)

BENJAMIN MERCADO (P2041), in his own right)
as an Injured Party)
)
CARMELO MERCADO (P2042), in his own right)
as an Injured Party)
)
WENDY ANNE METZ (P2043), in her own right as)
the Sister of **RAYMOND JOSEPH METZ, III,**)
Deceased)
)
HAROLD MEYERS (P2044), in his own right as an)
Injured Party)
)
THOMAS MEYERS (P2045), in his own right as an)
Injured Party)
)
JOSEPH M. MILANOWYCZ (P2046), in his own)
right and as the Representative of the **ESTATE OF**)
GREGORY MILANOWYCZ, Deceased)
)
)
ADELE MILANOWYCZ (P2047), in her own right)
as the Mother of **GREGORY MILANOWYCZ,**)
Deceased)
)
ROLAND MILETTI (P2048), in his own right as an)
Injured Party)
)
ADAM ERIC MILLER (P2049), in his own right as)
the Son of **JOEL MILLER,** Deceased)
)
DAVID J. MILLER (P2050), in his own right and as)
the Co-Representative of the **ESTATE OF**)
NICOLE CAROL MILLER, Deceased)
)
CATHERINE STEFANI (P2051), in her own right)
and as the Co-Representative of the **ESTATE OF**)
NICOLE CAROL MILLER, Deceased)
)
TIFFNEY MILLER (P2052), in her own right as the)
Sister of **NICOLE CAROL MILLER,** Deceased)
)
ROBERT MILLER (P2053), in his own right as an)
Injured Party)
)
MITOKO MILLER (P2054), in her own right and)
as the Representative of the **ESTATE OF**)
ROBERT C. MILLER, JR., Deceased)
)
TERRY R. MILLER (P2055), in his own right as)

the Brother of **ROBERT C. MILLER, JR.**,)
 Deceased)
)
JAMES R. MILLER (P2056), in his own right as)
 the Brother of **ROBERT C. MILLER, JR.**,)
 Deceased)
)
PAULA A. MINARA (P2057), in her own right and)
 as the Representative of the **ESTATE OF**)
ROBERT MINARA, Deceased)
)
JOSEPH M. MINOGUE (P2058), in his own right)
 as an Injured Party)
)
WILLIAM J. MIRRO (P2059), in his own right as)
 an Injured Party)
)
DONALD H. MISCHKE (P2060), in his own right)
 as an Injured Party)
)
STEVE S. MODICA (P2061), in his own right as an)
 Injured Party)
BILL MOFFAT (P2062), in his own right as an)
 Injured Party)
)
HORTENSIA GONZALEZ (P2063), on behalf of)
 the Minor Child, and as the Representative of the)
ESTATE OF DENNIS MOJICA, Deceased)
)
JODI MOLISANI (P2064), in her own right, on)
 behalf of the Minor Child, and as the Representative)
 of the **ESTATE OF JUSTIN JOHN MOLISANI**,)
JR., Deceased)
)
MICHAEL MOLLOY (P2065), in his own right as)
 an Injured Party)
)
JOSEPH W. MONTAPERTO (P2066), in his own)
 right as an Injured Party)
)
FRANK J. MONTARULI (P2067), in his own right)
 as an Injured Party)
)
NANCY E. MONTESI (P2068), in her own right, on)
 behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF MICHAEL G.**)
MONTESI, Deceased)
)
JAMES L. MORANDI (P2069), in his own right as)
 an Injured Party)
)

DAVID M. MORIARTY (P2070), in his own right)
as an Injured Party)
)
JOHN MORRIS (P2071), in his own right as an)
Injured Party)
)
LYNN MORRIS (P2072), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF SETH A.**)
MORRIS, Deceased)
)
PETER MORRISSEY (P2073), in his own right as)
an Injured Party)
)
MICHAEL MOSCHITTA (P2074), in his own right)
as an Injured Party)
)
NATALIA MUSHINSKI (P2075), in her own right)
and as the Representative of the **ESTATE OF**)
IOURI MOUCHINSKI, Deceased)
)
OLENA PAVLOVA (P2076), in her own right as the)
Daughter of **IOURI MOUCHINSKI**, Deceased)
)
IRINA USHAKOLA (P2077), in her own right as)
the Daughter of **IOURI MOUCHINSKI**, Deceased)
)
DANIEL MOZZILLO (P2078), in his own right as)
the Brother of **CHRISTOPHER MOZZILLO**,)
Deceased)
)
MICHAEL J. MULLARKEY (P2079), in his own)
right as an Injured Party)
)
GEORGE E. MULLEN, JR. (P2080), in his own)
right as an Injured Party)
)
BRIAN D. MULLER (P2081), in his own right as an)
Injured Party)
)
STEVEN J. MULLER (P2082), in his own right as)
an Injured Party)
)
MICHAEL MULLIGAN (P2083), in his own right)
as an Injured Party)
)
LYNN A. MULLIN (P2084), in her own right and as)
the Representative of the **ESTATE OF MICHAEL**)
JOSEPH MULLIN, Deceased)

FREDRIC MULLIN (P2085), in his own right as
the Father of **MICHAEL JOSEPH MULLIN**,
Deceased)
))
TOM MULQUEEN (P2086), in his own right as an)
Injured Party)
))
ALLEN P. MURPHY (P2087), in his own right as)
an Injured Party)
))
WILLIAM C. MURPHY, JR. (P2088), in his own)
right as the Father of **JAMES THOMAS**
MURPHY, Deceased)
))
JOAN V. MURPHY (P2089), in her own right as the)
Mother of **JAMES THOMAS MURPHY**,)
Deceased)
))
WILLIAM C. MURPHY, III (P2090), in his own)
right as the Brother of **JAMES THOMAS**
MURPHY, Deceased)
THOMAS J. MURPHY (P2091), in his own right as)
the Brother of **JAMES THOMAS MURPHY**,)
Deceased)
))
LINDA MURPHY (P2092), in her own right and on)
behalf of the Minor Child of **RAYMOND E.**
MURPHY, SR., Deceased)
))
RAYMOND MURPHY, JR. (P2093), in his own)
right as the Son of **RAYMOND E. MURPHY, SR.**,)
Deceased)
))
VINCENT J. MURPHY (P2094), in his own right as)
an Injured Party)
))
RICHARD S. MURRAY (P2095), in his own right)
as an Injured Party)
))
ROBERT MURRAY (P2096), in his own right as an)
Injured Party)
))
JOHN NAJMY (P2097), in his own right as an)
Injured Party)
))
LOUIS NAPOLI (P2098), in his own right as an)
Injured Party)
))
THOMAS NAPOLITANO (P2099), in his own)

right as an Injured Party)
))
ROBERT V. NARDUCCI (P2100), in his own right)
as an Injured Party)
))
DEAN NELIGAN (P2101), in his own right as an)
Injured Party)
))
JOHN NESBITT (P2102), in his own right as an)
Injured Party)
))
ALLAN P. NEUENDORF (P2103), in his own right)
as an Injured Party)
))
BRIAN A. NEVILLE (P2104), in his own right as)
an Injured Party)
))
SEAN S. NEWMAN (P2105), in his own right as an)
Injured Party)
))
JAMES NIEBLER (P2106), in his own right as an)
Injured Party)
IRMA NIEVES (P2107), in her own right and on)
behalf of the Minor Child of **JUAN NIEVES, JR.**,)
Deceased)
))
DAVID NIEVES (P2108), in his own right as the)
Son of **JUAN NIEVES, JR.**, Deceased)
))
JOHN NIEVES (P2109), in his own right as the Son)
of **JUAN NIEVES, JR.**, Deceased)
))
MICHELLE NIEVES (P2110), in her own right as)
the Daughter of **JUAN NIEVES, JR.**, Deceased)
))
JENNIFER NILSEN (P2111), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF TROY**)
EDWARD NILSEN, Deceased)
))
EDWARD NILSEN (P2112), in his own right as the)
Father of **TROY EDWARD NILSEN**, Deceased)
))
EVERETT J. MCGARRY (P2113), in his own right)
as the Father of **KATHERINE MCGARRY**)
NOACK, Deceased)
))
KATHRYN M. MCGARRY (P2114), in her own)
right as the Mother of **KATHERINE MCGARRY**)
NOACK, Deceased)

CHRISTINE M. O'BERG (P2115), in her own right)
 and as the Representative of the **ESTATE OF**)
DENNIS P. O'BERG, Deceased)
)
MICHAEL O'BRIEN (P2116), in his own right as)
 an Injured Party)
)
RICHARD O'BRIEN (P2117), in his own right as)
 an Injured Party)
)
BERNARD J. O'BRIEN (P2118), in his own right)
 as the Father of **TIMOTHY MICHAEL**)
O'BRIEN, Deceased)
)
MARILYN O'BRIEN (P2119), in her own right as)
 the Mother of **TIMOTHY MICHAEL O'BRIEN**,)
 Deceased)
)
PATRICK O'BRIEN (P2120), in his own right as)
 the Brother of **TIMOTHY MICHAEL O'BRIEN**,)
 Deceased)
ROBERT L. O'BRIEN (P2121), in his own right as)
 the Brother of **TIMOTHY MICHAEL O'BRIEN**,)
 Deceased)
)
RHONDA LEE O'CALLAGHAN (P2122), in her)
 own right and as the Representative of the **ESTATE**)
OF DANIEL O'CALLAGHAN, Deceased)
)
CHRISTOPHER O'CONNELL (P2123), in his)
 own right as an Injured Party)
)
SEAN M. O'CONNOR (P2124), in his own right as)
 an Injured Party)
)
JOHN J. O'DONNELL (P2125), in his own right as)
 an Injured Party)
)
ROBERT E. O'FLAHERTY (P2126), in his own)
 right as an Injured Party)
)
RACHEL UCHITEL (P2127), in her own right as)
 the Fiancé of **ANDREW O'GRADY**, Deceased)
)
ANDREA O'HAGAN (P2128), in her own right and)
 as the Representative of the **ESTATE OF**)
THOMAS GERARD O'HAGAN, Deceased)
)
FRANCIS P. O'HAGAN, SR. (P2129), in his own)

right as the Father of **THOMAS GERARD**)
O'HAGAN, Deceased)
)
RAYMOND T. O'HAGAN (P2130), in his own)
 right as the Brother of **THOMAS GERARD**)
O'HAGAN, Deceased)
)
JEANNE T. MCCABE (P2131), in her own right as)
 the Sister of **THOMAS GERARD O'HAGAN**,)
 Deceased)
)
KATHLEEN GAETANO (P2132), in her own right)
 as the Sister of **THOMAS GERARD O'HAGAN**,)
 Deceased)
)
MARY ELLEN MALONE (P2133), in her own)
 right as the Sister of **THOMAS GERARD**)
O'HAGAN, Deceased)
)
ANNE MARIE MORAN (P2134), in her own right)
 as the Sister of **THOMAS GERARD O'HAGAN**,)
 Deceased)
CHRISTOPHER O'KEEFE (P2135), in his own)
 right as an Injured Party)
)
PATRICK J. O'KEEFE (P2136), in his own right as)
 an Injured Party)
)
KAREN LISA O'KEEFE (P2137), in her own right)
 as the Wife of **PATRICK JOSEPH O'KEEFE**,)
 Deceased)
)
RICHARD O'MACK (P2138), in his own right as)
 an Injured Party)
)
THOMAS O'MEARA (P2139), in his own right as)
 an Injured Party)
)
MARYANN J. O'ROURKE (P2140), in her own)
 right and as the Representative of the **ESTATE OF**)
KEVIN M. O'ROURKE, Deceased)
)
JAMIE O'ROURKE (P2141), in his own right as)
 the Son of **KEVIN M. O'ROURKE**, Deceased)
)
CORINNE O'ROURKE (P2142), in her own right)
 as the Daughter of **KEVIN M. O'ROURKE**,)
 Deceased)
)
DENNIS O'ROURKE (P2143), in his own right as)

the Father of **KEVIN M. O'ROURKE**, Deceased)
)
HANNAH O'ROURKE (P2144), in her own right as)
 the Mother of **KEVIN M. O'ROURKE**, Deceased)
)
PATRICIA O'KEEFE (P2145), in her own right as)
 the Sister of **KEVIN M. O'ROURKE**, Deceased)
)
RADAMES OCASIO (P2146), in his own right as)
 an Injured Party)
)
DALISAY SAENZ OLAES (P2147), in her own)
 right as an Injured Party)
)
CLIFFORD I. OLSEN (P2148), in his own right as)
 the Brother of **ERIC TAUBE OLSEN**, Deceased)
)
DENISE M. OLSEN (P2149), in her own right and)
 as the Representative of the **ESTATE OF**)
JEFFREY JAMES OLSEN, Deceased)
)
)
CAROL A. SMEE (P2150), in her own right as the)
 Sister of **MICHAEL C. OPPERMAN**, Deceased)
)
AGATINA IACI (P2151), in her own right as the)
 Mother of **JANE ORTH**, Deceased)
)
GAE FERRUOLO (P2152), in her own right as the)
 Sister of **JANE ORTH**, Deceased)
)
EDNA KANG ORTIZ (P2153), in her own right and)
 as the Representative of the **ESTATE OF PABLO**)
ORTIZ, Deceased)
)
STEPHEN W. OSTROWSKI (P2154), in his own)
 right as the Brother of **JAMES ROBERT**)
OSTROWSKI, Deceased)
)
VINCENT J. PANARO (P2155), in his own right as)
 an Injured Party)
)
MARK PAPADOPULOS (P2156), in his own right)
 as an Injured Party)
)
VINCENT PAPASSO (P2157), in his own right as)
 the Brother of **SALVATORE T. PAPASSO**,)
 Deceased)
)
JUANA OLGA PAPPAGEORGE (P2158), in her)

own right as the Mother of **JAMES N. PAPPAGEORGE**, Deceased)
HELEN PAPPAGEORGE (P2159), in her own right as the Sister of **JAMES N. PAPPAGEORGE**, Deceased)
GINA PINOS (P2160), in her own right as the Fiancé of **JAMES N. PAPPAGEORGE**, Deceased)
DEAN G. PAPPAS (P2161), in his own right as an Injured Party)
CHRISTINA PARIS (P2162), in her own right, on behalf of the Minor Child, and as the Representative of the **ESTATE OF GEORGE PARIS**, Deceased)
ROSE PARIS (P2163), in her own right as the Mother of **GEORGE PARIS**, Deceased)
SALVATORE PARISI (P2164), in his own right as an Injured Party)
KAREN PARRO (P2165), in her own right and on behalf of the Minor Child of **ROBERT PARRO**, Deceased)
IMELDA REYES SORIANO (P2166), in her own right as the Domestic Partner of **LEOBARDO LOPEZ PASCUAL**, Deceased)
ANANT PATEL (P2167), in his own right as an Injured Party)
LISA PATERSON (P2168), in her own right, on behalf of the Minor Child, and as the Representative of the **ESTATE OF STEVEN BENNETT PATERSON**, Deceased)
LOUIS M. PECORA (P2169), in his own right as an Injured Party)
RICHARD PEITLER (P2170), in his own right as an Injured Party)
MICHELE T. PENA (P2171), in her own right, on behalf of the Minor Children, and as the Representative of the **ESTATE OF ANGEL R. PENA**, Deceased)
RALPH PEPE (P2172), in his own right as an)

Injured Party)
)
STEVEN C. PERRY (P2173), in his own right as an)
Injured Party)
)
WILLIAM J. PESATURE (P2174), in his own right)
as an Injured Party)
)
ROBERT E. PETERS (P2175), in his own right as)
an Injured Party)
)
PEDRO PICHARDO (P2176), in his own right as)
an Injured Party)
)
MARIE PUCCIO-PICK (P2177), in her own right,)
on behalf of the Minor Child, and as the)
Representative of the **ESTATE OF JOSEPH**)
PICK, Deceased)
)
PHILIP J. PILLET (P2178), in his own right as an)
Injured Party)
)
DOROTHY ANCONA (P2179), in her own right as)
the Mother of **SUSAN ELIZABETH PINTO**,)
Deceased)
)
BARBARA GRAY (P2180), in her own right as the)
Sister of **SUSAN ELIZABETH PINTO**, Deceased)
)
VINCENT PINTO (P2181), in his own right as an)
Injured Party)
)
GERARD PIRRAGLIA (P2182), in his own right as)
an Injured Party)
)
ROSEMARY PISKADLO (P2183), in her own right)
and as the Representative of the **ESTATE OF**)
JOSEPH PISKADLO, Deceased)
)
STEVEN PISKADLO (P2184), in his own right as)
the Son of **JOSEPH PISKADLO**, Deceased)
)
BRIAN PISKADLO (P2185), in his own right as the)
Son of **JOSEPH PISKADLO**, Deceased)
)
LAURA PISKADLO (P2186), in her own right as)
the Daughter of **JOSEPH PISKADLO**, Deceased)
)
LEONARD PITTZ (P2187), in his own right as an)
Injured Party)

)
EDMUND L. PLUNKETT (P2188), in his own right)
as an Injured Party)
)
DAN J. POTTER (P2189), in his own right as an)
Injured Party)
)
JEAN POWELL (P2190), in her own right as the)
Wife of **SEAN POWELL**, Deceased)
)
FRANK PRESCIA (P2191), in his own right as an)
Injured Party)
)
SALVATORE T. PRINCIOTTA, JR. (P2192), in)
his own right as an Injured Party)
)
GERARD J. PRIOR (P2193), in his own right as the)
Father of **KEVIN M. PRIOR**, Deceased)
)
MARIAN A. PRIOR (P2194), in her own right as)
the Mother of **KEVIN M. PRIOR**, Deceased)
)
MICHAEL J. PRIOR (P2195), in his own right as)
an Injured Party)
)
BRIAN PRITCHARD (P2196), in his own right as)
an Injured Party)
)
WILLIAM PRIVITAR (P2197), in his own right as)
an Injured Party)
)
KATHRYN S. PRUIM (P2198), in her own right)
and on behalf of the Minor Child of **DAVID L.**)
PRUIM, Deceased)
)
SUSAN PRUNTY (P2199), in her own right and as)
the Representative of the **ESTATE OF RICHARD**)
PRUNTY, Deceased)
)
VINCENT PULEO (P2200), in his own right as an)
Injured Party)
)
ROBERT PULIZZOTTO (P2201), in his own right)
as an Injured Party)
)
DANIEL P. PURCELL (P2202), in his own right as)
an Injured Party)
)
JOHN M. QUEVEDO, JR. (P2203), in his own)
right as an Injured Party)

)
MICHAEL J. QUEVEDO (P2204), in his own right)
as an Injured Party)
)
EDWIN QUINN (P2205), in his own right as an)
Injured Party)
)
PAUL G. QUIRKE (P2206), in his own right as an)
Injured Party)
JAMES P. RAE (P2207), in his own right as an)
Injured Party)
)
RAYMOND RAGUCCI (P2208), in his own right as)
an Injured Party)
)
DARLENE G. RALL (P2209), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF EDWARD J.**)
RALL, Deceased)
)
EDWARD A. RALL (P2210), in his own right as the)
Father of **EDWARD J. RALL**, Deceased)
JOAN P. RALL (P2211), in her own right as the)
Mother of **EDWARD J. RALL**, Deceased)
)
KEITH G. RALL (P2212), in his own right as the)
Brother of **EDWARD J. RALL**, Deceased)
)
WILLIAM F. RALL (P2213), in his own right as)
the Brother of **EDWARD J. RALL**, Deceased)
)
KENNETH M. RALLIS (P2214), in his own right)
as an Injured Party)
)
RICHARD RAMAIZEL (P2215), in his own right)
as an Injured Party)
)
SEBASTIAN RASPANTI (P2216), in his own right)
as an Injured Party)
)
REGINALD SIMPSON (P2217), in his own right as)
the Brother of **MARSHA RATCHFORD**,)
Deceased)
)
CYNTHIA BENNETT (P2218), in her own right as)
the Sister of **MARSHA RATCHFORD**, Deceased)
)
ANGELIA S. BLUNT (P2219), in her own right as)
the Sister of **MARSHA RATCHFORD**, Deceased)
)

JAMES REDDAN (P2220), in his own right as an Injured Party)
)
)
JOSH M. REDER (P2221), in his own right as an Injured Party)
)
)
DANIEL REEBER (P2222), in his own right as an Injured Party)
)
)
RICHARD REGIS (P2223), in his own right as an Injured Party)
)
)
JOSEPH REID (P2224), in his own right as an Injured Party)
)
)
TIMOTHY J. REID (P2225), in his own right as an Injured Party)
)
)
CHARLES REILLY (P2226), in his own right as an Injured Party)
)
)
THOMAS REILLY (P2227), in his own right as an Injured Party)
)
)
JOHN E. REINHARDT (P2228), in his own right as an Injured Party)
)
)
LLOYD RENDALL (P2229), in his own right as an Injured Party)
)
)
CHRISTOPHER REVERE (P2230), in his own right as an Injured Party)
)
)
KAREM REYNOSO (P2231), in her own right as an Injured Party)
)
)
WILLIAM J. RICCARDULLI (P2232), in his own right as an Injured Party)
)
)
DANIEL RICCIARDI (P2233), in his own right as an Injured Party)
)
)
JOHN RICCOBONI (P2234), in his own right as the Husband of **ANN MARIE RICCOBONI**, Deceased)
)
)
JANINE RICCOBONI (P2235), in her own right as the Daughter of **ANN MARIE RICCOBONI**, Deceased)

MARIA ELENA SANTORELLI (P2236), in her
 own right as the Daughter of **ANN MARIE**
RICCOBONI, Deceased)
)
HUGH D. RICE (P2237), in his own right and as the
 Representative of the **ESTATE OF DAVID H.**
RICE, Deceased)
)
CYNTHIA J. RICE (P2238), in her own right as the
 Mother of **DAVID H. RICE**, Deceased)
)
MAURICE RICHARDSON (P2239), in his own
 right as an Injured Party)
)
FRANCO RIGGIO (P2240), in his own right as an
 Injured Party)
)
DAVID M. RIVAS (P2241), in his own right as an
 Injured Party)
)
CARLOS A. RIVERA (P2242), in his own right as
 an Injured Party)
EDWIN RIVERA (P2243), in his own right as an
 Injured Party)
)
PAUL RIZZA (P2244), in his own right as the
 Father of **PAUL V. RIZZA**, Deceased)
)
VIVIAN RIZZA (P2245), in her own right as the
 Mother of **PAUL V. RIZZA**, Deceased)
)
ROBERT ROBERTO, SR. (P2246), in his own
 right as the Father of **JOSEPH ROBERTO**,
 Deceased)
)
LUCY ROBERTO (P2247), in her own right as the
 Mother of **JOSEPH ROBERTO**, Deceased)
)
ROBERT ROBERTO, JR. (P2248), in his own right
 as the Brother of **JOSEPH ROBERTO**, Deceased)
)
LORRAINE CAIAZZO (P2249), in her own right
 as the Sister of **JOSEPH ROBERTO**, Deceased)
)
PAULETTE ROBERTS (P2250), in her own right
 and as the Representative of the **ESTATE OF**
MICHAEL E. ROBERTS, Deceased)
)
THOMAS ROBERTS (P2251), in his own right as)

the Father of **MICHAEL E. ROBERTS**, Deceased)
)
DONALD W. ROBERTSON, SR. (P2252), in his)
own right as the Father of **DONALD W.**)
ROBERTSON, JR., Deceased)
)
MARCEE E. ROBERTSON (P2253), in her own)
right as the Mother of **DONALD W.**)
ROBERTSON, JR., Deceased)
)
KATHLEEN ROBERTSON CUNNINGHAM)
(P2254), in her own right as the Sister of **DONALD**)
W. ROBERTSON, JR., Deceased)
)
ELIZABETH ROBERTSON (P2255), in her own)
right as the Sister of **DONALD W. ROBERTSON,**)
JR., Deceased)
)
JOHN ROCHE (P2256), in his own right as an)
Injured Party)
)
)
)
)
JOYCE ANN M. RODAK (P2257), in her own)
right, on behalf of the Minor Children, and as the)
Representative of the **ESTATE OF JOHN M.**)
RODAK, Deceased)
)
JOHN J. RODAK (P2258), in his own right as the)
Father of **JOHN M. RODAK**, Deceased)
)
REGINA E. RODAK (P2259), in her own right as)
the Mother of **JOHN M. RODAK**, Deceased)
)
JOHN ROGAN (P2260), in his own right as the)
Father of **MATTHEW SEAN ROGAN**, Deceased)
)
MARIAN ROGAN (P2261), in her own right as the)
Mother of **MATTHEW SEAN ROGAN**, Deceased)
)
JOHN T. ROKEE (P2262), in his own right as an)
Injured Party)
)
ARNOLD ROMA (P2263), in his own right as an)
Injured Party)
)
MAUREEN ROMA GARRI (P2264), in her own)
right as the Sister of **KEITH ROMA**, Deceased)
)

KEVIN ROMA (P2265), in his own right as the Brother of **KEITH ROMA**, Deceased)
)
)
WILLIAM ROMA (P2266), in his own right as an Injured Party)
)
)
JOHN B. ROONEY (P2267), in his own right as an Injured Party)
)
)
VICTOR J. ROSA (P2268), in his own right as an Injured Party)
)
)
ANTHONY A. ROSADO (P2269), in his own right as an Injured Party)
)
)
BARRY ROSNER (P2270), in his own right as the Father of **SHERYL ROSENBAUM**, Deceased)
)
)
BOBBI ROSNER (P2271), in her own right as the Mother of **SHERYL ROSENBAUM**, Deceased)
)
)
LOREN ROSENTHAL (P2272), in her own right and as the Representative of the **ESTATE OF RICHARD ROSENTHAL**, Deceased)
)
PETER A. ROSSOMANDO (P2273), in his own right as the Father of **NICHOLAS P. ROSSOMANDO**, Deceased)
)
)
LOUIS ROTONDO (P2274), in his own right as an Injured Party)
)
)
DAVID ROWAN (P2275), in his own right as an Injured Party)
)
)
MARK J. ROWAN (P2276), in his own right as an Injured Party)
)
)
JAMES J. ROZAS (P2277), in his own right as an Injured Party)
)
)
LOUIS RUGGIRELLO (P2278), in his own right as an Injured Party)
)
)
DONALD J. RULAND (P2279), in his own right as an Injured Party)
)
)
THOMAS D. RYAN (P2280), in his own right as an Injured Party)
)
)
CLIFTON SABBAG (P2281), in his own right as)

the Brother of **JASON E. SABBAG**, Deceased)
)
LAURENCE HAGAN (P2282), in her own right as)
 the Sister of **JASON E. SABBAG**, Deceased)
)
DIANA SABELLA (P2283), in her own right and on)
 behalf of the Minor Children of **THOMAS E.**)
SABELLA, Deceased)
)
EDWARD SABELLA (P2284), in his own right as)
 the Father of **THOMAS E. SABELLA**, Deceased)
)
ANN SABELLA (P2285), in her own right as the)
 Mother of **THOMAS E. SABELLA**, Deceased)
)
CHARLES T. SABELLA (P2286), in his own right)
 as the Brother of **THOMAS E. SABELLA**,)
 Deceased)
)
LORETTA SABELLA VIGLIONE (P2287), in her)
 own right as the Sister of **THOMAS E. SABELLA**,)
 Deceased)
)
JOHN SAFI (P2288), in his own right and as the)
 Representative of the **ESTATE OF JUDE ELIAS**)
SAFI, Deceased)
)
AHLAM SAFI (P2289), in her own right as the)
 Father of **JUDE ELIAS SAFI**, Deceased)
)
ELIAS SAFI (P2290), in her own right as the Mother)
 of **JUDE ELIAS SAFI**, Deceased)
)
MATTHEW SALMON (P2291), in his own right as)
 an Injured Party)
)
ROBERT SALMON (P2292), in his own right as an)
 Injured Party)
)
CLIDE R. SAMPSON (P2293), in his own right as)
 an Injured Party)
)
JOSE LUIS SAN PIO (P2294), in his own right and)
 as the Representative of the **ESTATE OF SYLVIA**)
SAN PIO, Deceased)
)
ROBERT SANTANDREA (P2295), in his own right)
 as an Injured Party)
)
 _____)

PATRICIA SANTORA (P2296), in her own right as)
 the Sister of **CHRISTOPHER A. SANTORA**,)
 Deceased)
)
JENNIFER ECHEVARRIA (P2297), in her own)
 right as the Sister of **CHRISTOPHER A.**)
SANTORA, Deceased)
)
KATHLEEN SANTORA-MONTALI (P2298), in)
 her own right as the Sister of **CHRISTOPHER A.**)
SANTORA, Deceased)
)
MEGAN MCINERNEY (P2299), in her own right)
 as the Sister of **CHRISTOPHER A. SANTORA**,)
 Deceased)
)
THELMA SAVERY (P2300), in her own right as an)
 Injured Party)
)
THOMAS SCALLY (P2301), in his own right as an)
 Injured Party)
)
)
JULIE SCARPITTA (P2302), in her own right and)
 as the Representative of the **ESTATE OF**)
MICHELLE SCARPITTA, Deceased)
)
BENEDICT SCARSELLA (P2303), in his own)
 right as an Injured Party)
)
JEANETTE SCHARDT (P2304), in her own right,)
 on behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF JOHN**)
SCHARDT, Deceased)
)
ROBERT SCHARDT (P2305), in his own right as)
 the Father of **JOHN SCHARDT**, Deceased)
)
MARGARET SCHARDT (P2306), in her own right)
 as the Mother of **JOHN SCHARDT**, Deceased)
)
KENNETH SCHARDT (P2307), in his own right as)
 the Brother of **JOHN SCHARDT**, Deceased)
)
DEBRA SACCO (P2308), in her own right as the)
 Sister of **JOHN SCHARDT**, Deceased)
)
CARL SCHEETZ (P2309), in his own right as an)
 Injured Party)
)

)
JOHN SCHILLINGER (P2310), in his own right as)
an Injured Party)
)
ROBERT SCHMITT (P2311), in his own right as)
an Injured Party)
)
ROBERT SCHNALL (P2312), in his own right as)
an Injured Party)
)
PETER A. SCHOEPE (P2313), in his own right as)
an Injured Party)
)
DANIEL R. SCHOFIELD (P2314), in his own right)
as an Injured Party)
)
DANIEL SCHUG (P2315), in his own right as an)
Injured Party)
)
LISA A. SCHUNK (P2316), in her own right as the)
Wife of **EDWARD W. SCHUNK**, Deceased)
)
DAVID SEDACCA (P2317), in his own right as an)
Injured Party)
JEFFREY SENTOWSKI (P2318), in his own right)
as an Injured Party)
)
JENNY RAHAMAN (P2319), in her own right as)
the Sister of **SITA N. SEWNARINE**, Deceased)
)
KEVIN SHAEFFER (P2320), in his own right as an)
Injured Party)
)
ABIDA SHAIKH (P2321), in her own right as an)
Injured Party)
)
SIGAL SHEFI ASHER (P2322), in her own right,)
on behalf of the Minor Children, and as the)
Representative of the **ESTATE OF HAGAY**)
SHEFI, Deceased)
)
RODNEY C. SHERARD (P2323), in his own right)
as an Injured Party)
)
FRANK SHERRY (P2324), in his own right as the)
Father of **JOHN ANTHONY SHERRY**, Deceased)
)
STEVE SHTAB (P2325), in his own right as an)
Injured Party)
_____)

JOHN SIGNORELLI (P2326), in his own right as an Injured Party)
)
FABIAN SILVA, JR. (P2327), in his own right as an Injured Party)
)
CRAIG W. SINCOCK (P2328), in his own right as the Husband of **CHERYLE D. SINCOCK**, Deceased)
)
BRIAN SINGER (P2329), in his own right as an Injured Party)
)
NEIL SKOW (P2330), in his own right as an Injured Party)
)
EUGENE SLATER (P2331), in his own right as an Injured Party)
)
GARETH SMITH (P2332), in his own right as an Injured Party)
)
PHILIP SMITH (P2333), in his own right as the Father of **KARL T. SMITH, SR.**, Deceased)
GEORGIA SMITH (P2334), in her own right as the Mother of **KARL T. SMITH, SR.**, Deceased)
)
PETER SMITH (P2335), in his own right as the Brother of **KARL T. SMITH, SR.**, Deceased)
)
MATTHEW G. SMITH (P2336), in his own right as the Brother of **KARL T. SMITH, SR.**, Deceased)
)
MICHAEL SMITH (P2337), in his own right as an Injured Party)
)
MICHAEL P. SMITH (P2338), in his own right as an Injured Party)
)
PETER SMITH (P2339), in his own right as an Injured Party)
)
SALVATORE SODANO (P2340), in his own right as an Injured Party)
)
DAVID SOZIO (P2341), in his own right as an Injured Party)
)
MICHAEL SPILLER (P2342), in his own right as an Injured Party)
)

CLIFFORD STABNER (P2343), in his own right as
 an Injured Party)
)
JOSEPH R. STACH, JR. (P2344), in his own right)
 as an Injured Party)
)
JOHN STARACE (P2345), in his own right as an)
 Injured Party)
)
ROSEMARY A. STARK (P2346), in her own right)
 as the Mother of **JEFFREY STARK**, Deceased)
)
PETER STATHIS (P2347), in his own right as an)
 Injured Party)
)
DENNIS STEFANAK (P2348), in his own right as)
 an Injured Party)
)
HARRY F. STEFANDEL (P2349), in his own right)
 as an Injured Party)
)
WILLIAM A. STEINBUCH, III (P2350), in his)
 own right as an Injured Party)
EUGENE STOLOWSKI (P2351), in his own right)
 as an Injured Party)
)
BEN STONE (P2352), in his own right as the Father)
 of **LONNY STONE**, Deceased)
)
EVELYN STONE (P2353), in her own right as the)
 Mother of **LONNY STONE**, Deceased)
)
GAIL STONE (P2354), in her own right as the Sister)
 of **LONNY STONE**, Deceased)
)
PATRICIA A. STRAINE (P2355), in her own right,)
 on behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF JAMES J.**)
STRAINE, JR., Deceased)
)
PAUL STROESSNER (P2356), in his own right as)
 an Injured Party)
)
SCOTT STROMER (P2357), in his own right as an)
 Injured Party)
)
SALLY ANN SUAREZ (P2358), in her own right)
 and on behalf of the Minor Children of **BENJAMIN**)
SUAREZ, Deceased)

GERARD SU DEN (P2359), in his own right as an Injured Party)
)
)
NANCY SUHR (P2360), in her own right, on behalf of the Minor Child, and as the Representative of the **ESTATE OF DANIEL SUHR**, Deceased)
)
)
EDWARD SULLIVAN (P2361), in his own right as an Injured Party)
)
)
JAMES W. SULLIVAN (P2362), in his own right as an Injured Party)
)
)
JOHN SULLIVAN (P2363), in his own right as an Injured Party)
)
)
JOHN M. SULLIVAN (P2364), in his own right as an Injured Party)
)
)
LAWRENCE J. SULLIVAN (P2365), in his own right as an Injured Party)
)
)
RANDOLPH J. SUPEK (P2366), in his own right as an Injured Party)
)
)
ROBERT SUTTON (P2367), in his own right as an Injured Party)
)
)
ALFRED SUWARA (P2368), in his own right as an Injured Party)
)
)
OTTO W. SUWARA (P2369), in his own right as an Injured Party)
)
)
RONALD SVEC (P2370), in his own right as an Injured Party)
)
)
THOMAS SWANNICK (P2371), in his own right as an Injured Party)
)
)
GERARD F. SWEENEY (P2372), in his own right as an Injured Party)
)
)
JOSEPH SWICK (P2373), in his own right as an Injured Party)
)
)
JOSEPH SZYMANSKI (P2374), in his own right as an Injured Party)

VINCENT A. MILOTTA (P2375), in his own right)
 as the Fiancé of **JOANN TABEEK**, Deceased)
JOHN F. TAGGART (P2376), in his own right as)
 an Injured Party)
JOHN TALTY (P2377), in his own right and on)
 behalf of the Minor Children of **PAUL TALTY**,)
 Deceased)
GLORIA TALTY (P2378), in her own right as the)
 Mother of **PAUL TALTY**, Deceased)
MARK TALTY (P2379), in his own right as the)
 Brother of **PAUL TALTY**, Deceased)
KEVIN TALTY (P2380), in his own right as the)
 Brother of **PAUL TALTY**, Deceased)
STEVEN TALTY (P2381), in his own right as the)
 Brother of **PAUL TALTY**, Deceased)
PATRICIA DOUGAN (P2382), in her own right as)
 the Sister of **PAUL TALTY**, Deceased)
KERRY MCCALL (P2383), in her own right as the)
 Sister of **PAUL TALTY**, Deceased)
JULIE M.Y. TAM (P2384), in her own right as the)
 Mother of **MAURITA TAM**, Deceased)
DONALD TAM (P2385), in his own right as the)
 Brother of **MAURITA TAM**, Deceased)
STEPHANIE TAM (P2386), in her own right as the)
 Sister of **MAURITA TAM**, Deceased)
JAMES W. TAMUCCIO, SR. (P2387), in his own)
 right as the Father of **MICHAEL ANDRE**)
TAMUCCIO, Deceased)
PATRICIA E. TAMUCCIO (P2388), in her own)
 right as the Mother of **MICHAEL ANDRE**)
TAMUCCIO, Deceased)
JAMES W. TAMUCCIO, II (P2389), in his own)
 right as the Brother of **MICHAEL ANDRE**)
TAMUCCIO, Deceased)

DANA M. TAMUCCIO (P2390), in her own right as)
the Sister of **MICHAEL ANDRE TAMUCCIO**,)
Deceased)

DIANE TAORMINA (P2391), in her own right, on)
behalf of the Minor Child, and as the Representative)
of the **ESTATE OF DENNIS G. TAORMINA**,)
JR., Deceased)

TIMOTHY J. TARPEY (P2392), in his own right as)
an Injured Party)

GERALDINE TEIXEIRA (P2393), in her own right)
as an Injured Party)

CLIFFORD TEMPESTA (P2394), in his own right)
as the Brother of **ANTHONY TEMPESTA**,)
Deceased)

LUCY E. THOMPSON (P2395), in her own right,)
on behalf of the Minor Children, and as the)
Representative of the **ESTATE OF CLIVE**)
THOMPSON, Deceased)

KEITH B. THOMPSON (P2396), in his own right)
as the Brother of **CLIVE THOMPSON**, Deceased)

DENNIS THOMSON (P2397), in his own right as)
an Injured Party)

DEBRA ANNE TIESTE (P2398), in her own right)
and as the Representative of the **ESTATE OF**)
WILLIAM R. TIESTE, Deceased)

KAREN DALLAVALLE (P2399), in her own right)
as the Fiancé of **KENNETH F. TIETJEN**,)
Deceased)

JAMES H. TIGHE (P2400), in his own right as the)
Brother of **STEPHEN E. TIGHE**, Deceased)

KRISTINE TIMMES (P2401), in her own right, on)
behalf of the Minor Child, and as the Representative)
of the **ESTATE OF SCOTT CHARLES**)
TIMMES, Deceased)

ANGEL TIRADO (P2402), in his own right and as)
the Representative of the **ESTATE OF HECTOR**)
LUIS TIRADO, JR., Deceased)

MICHAEL K. TOBIN (P2403), in his own right as an Injured Party)
)
)
SALVATORE S. TORCIVIA (P2404), in his own right as an Injured Party)
)
)
WILLIAM TRACY (P2405), in his own right as an Injured Party)
)
)
JOHN TREGLIA (P2406), in his own right as an Injured Party)
)
)
JOSEPH M. TREZZA (P2407), in his own right as an Injured Party)
)
)
ALFRED TRINIDAD (P2408), in his own right as an Injured Party)
)
)
ROBERT TRINIDAD (P2409), in his own right as the Brother of **MICHAEL A. TRINIDAD**, Deceased)
)
)
BRENDA TRINIDAD (P2410), in her own right as the Sister of **MICHAEL A. TRINIDAD**, Deceased)
JEANETTE TRINIDAD RZEK (P2411), in her own right as the Sister of **MICHAEL A. TRINIDAD**, Deceased)
)
)
CAROL PAYNE (P2412), in her own right as the Sister of **MICHAEL A. TRINIDAD**, Deceased)
)
)
DENISE TRINIDAD (P2413), in her own right as the Sister of **MICHAEL A. TRINIDAD**, Deceased)
)
)
JANE TRINIDAD HENNES (P2414), in her own right as the Sister of **MICHAEL A. TRINIDAD**, Deceased)
)
)
BETTY ANDRADE (P2415), in her own right as the Sister of **MICHAEL A. TRINIDAD**, Deceased)
)
)
MILLIE CASERES-SCHIFANO (P2416), in her own right as the Sister of **MICHAEL A. TRINIDAD**, Deceased)
)
)
DOUGLAS TRIPKEN (P2417), in his own right as an Injured Party)
)
)
MICHAEL TRIPPTREE (P2418), in his own right as an Injured Party)

LOUIS M. TROISI (P2419), in his own right as an Injured Party)
STANLEY TROJANOWSKI (P2420), in his own right as an Injured Party)
LARRY TROY (P2421), in his own right as an Injured Party)
DELL TRUAX (P2422), in his own right as an Injured Party)
KEVIN M. TULLY (P2423), in his own right as an Injured Party)
STEVEN TURILLI (P2424), in his own right as an Injured Party)
JOSEPH A. TURSI (P2425), in his own right as an Injured Party)
JOHN M. TYSON (P2426), in his own right as an Injured Party)
ANNE MARIE VACCACIO (P2427), in her own right and as the Representative of the **ESTATE OF JOHN DAMIEN VACCACIO**, Deceased)
JAMES R. VACCACIO (P2428), in his own right as the Father of **JOHN DAMIEN VACCACIO**, Deceased)
CHRISTOPHER J. VACCACIO (P2429), in his own right as the Brother of **JOHN DAMIEN VACCACIO**, Deceased)
GRISSEL RODRIGUEZ VALENTIN (P2430), in her own right and on behalf of the Minor Children of **BENITO VALENTIN**, Deceased)
ROBERT VAN HOUTEN (P2431), in his own right as an Injured Party)
PAUL VAN LAERE (P2432), in his own right as the Brother of **DANIEL MAURICE VAN LAERE**, Deceased)
RITA M. WILEY (P2433), in her own right as the Sister of **DANIEL MAURICE VAN LAERE**, Deceased)

JACQUELINE VAN LAERE HAYES (P2434), in her own right as the Sister of **DANIEL MAURICE VAN LAERE**, Deceased)
)
WILLIAM C. VAN NAME (P2435), in his own right as an Injured Party)
)
BRUCE J. VAN NOSDALL (P2436), in his own right as an Injured Party)
)
ANTHONY VANACORE (P2437), in his own right as an Injured Party)
)
ROBERT VARESE (P2438), in his own right as an Injured Party)
)
MELISSA VAZQUEZ (P2439), in her own right as the Daughter of **ARCANGEL VAZQUEZ**, Deceased)
)
AL VEGA (P2440), in his own right as an Injured Party)
)
CONSUELO VELAZQUEZ (P2441), in her own right and as the Representative of the **ESTATE OF JORGE VELAZQUEZ**, Deceased)
)
CHARLES VELLA (P2442), in his own right as an Injured Party)
)
JAMES A. VELLA (P2443), in his own right as an Injured Party)
)
NELLIE VERDEJO (P2444), in her own right as an Injured Party)
)
JOHN VERRENGIA (P2445), in his own right as an Injured Party)
)
DELIA VILLANUEVA (P2446), in her own right and as the Representative of the **ESTATE OF SERGIO GABRIEL VILLANUEVA**, Deceased)
)
TANYA VILLANUEVA (P2447), in her own right as the Fiancé of **SERGIO GABRIEL VILLANUEVA**, Deceased)
)
STEVE VILLANUEVA (P2448), in his own right as the Brother of **SERGIO GABRIEL**)

VILLANUEVA, Deceased)
)
MARIA SUAREZ (P2449), in her own right as the)
Sister of SERGIO GABRIEL VILLANUEVA,)
Deceased)
)
TIMOTHY VILLARI (P2450), in his own right as)
an Injured Party)
)
DOMINICK VINCENTI (P2451), in his own right)
as an Injured Party)
)
BRYAN VIOLETTO (P2452), in his own right as an)
Injured Party)
)
BRIAN VOOS (P2453), in his own right as an)
Injured Party)
)
EDWARD WAGNER (P2454), in his own right as)
an Injured Party)
)
MICKEY WALKER (P2455), in his own right as an)
Injured Party)
)
CHRISLAN FULLER MANUEL (P2456)as the)
Representative of the ESTATE OF META L.)
WALLER, Deceased)
)
JEFFREY M. WALSH (P2457), in his own right as)
the Son of BARBARA P. WALSH, Deceased)
)
JAMES J. WALSH, JR. (P2458), in his own right as)
the Son of BARBARA P. WALSH, Deceased)
)
KERRY M. WALSH (P2459), in his own right as an)
Injured Party)
)
VICTORIA RANDALL (P2460), in her own right)
as the Mother of STEPHEN GORDON WARD,)
Deceased)
)
KENNETH R. WARD (P2461), in his own right as)
the Brother of STEPHEN GORDON WARD,)
Deceased)
)
KATHRYN A. GRAHAM (P2462), in her own right)
as the Sister of STEPHEN GORDON WARD,)
Deceased)
)
SUSAN MOORE (P2463), in her own right as the)

Sister of **STEPHEN GORDON WARD**, Deceased)
)
DOYLE RAYMOND WARD (P2464), in his own)
right and as the Representative of the **ESTATE OF**)
TIMOTHY RAY WARD, Deceased)
)
WAYNE WARREN (P2465), in his own right as an)
Injured Party)
)
JANICE WATERS (P2466), in her own right and on)
behalf of the Minor Children of **PATRICK J.**)
WATERS, Deceased)
)
CRAIG WEBER (P2467), in his own right as an)
Injured Party)
)
WILLIAM G. WEINERT (P2468), in his own right)
as an Injured Party)
)
KATHRYN CARRICKER (P2469), in her own)
right and as the Representative of the **ESTATE OF**)
STEVEN GEORGE WEINSTEIN, Deceased)
)
)
JAMES S. WEISENBURGER, JR. (P2470), in his)
own right as an Injured Party)
)
ADELE WELTY (P2471), in her own right as the)
Mother of **TIMOTHY WELTY**, Deceased)
)
JAMES M. WERNER (P2472), in his own right as)
an Injured Party)
)
EILEEN K. WEST (P2473), in her own right and as)
the Representative of the **ESTATE OF PETER**)
MATTHEW WEST, Deceased)
)
MEREDITH W. NELSON (P2474), in her own)
right as the Daughter of **PETER MATTHEW**)
WEST, Deceased)
)
GREGORY J. WEST (P2475), in his own right as)
the Brother of **PETER MATTHEW WEST**,)
Deceased)
)
ARTHUR H. WEST, JR. (P2476), in his own right)
as the Brother of **PETER MATTHEW WEST**,)
Deceased)
)
VINCENT M. WEST (P2477), in his own right as)

the Brother of **PETER MATTHEW WEST**,)
 Deceased)
)
CATHERINE C. MCLAUGHLIN (P2478), in her)
 own right as the Sister of **PETER MATTHEW**)
WEST, Deceased)
)
MARY LOUISE BALL (P2479), in her own right as)
 the Sister of **PETER MATTHEW WEST**,)
 Deceased)
)
REGINA W. TOWNSEND (P2480), in her own)
 right as the Sister of **PETER MATTHEW WEST**,)
 Deceased)
)
KEVIN WHALEN (P2481), in his own right as an)
 Injured Party)
)
PATRICIA J. WHALEN (P2482), in her own right)
 and as the Representative of the **ESTATE OF**)
MEREDITH LYNN WHALEN, Deceased)
)
)
KRISTEN E. WHALEN (P2483), in her own right)
 as the Sister of **MEREDITH LYNN WHALEN**,)
 Deceased)
)
PAUL A. WHALEN (P2484), in his own right as an)
 Injured Party)
)
BRENDAN WHELAN (P2485), in his own right as)
 an Injured Party)
)
ALFRED L. WHELAN, SR. (P2486), in his own)
 right and as the Representative of the **ESTATE OF**)
EUGENE MICHAEL WHELAN, Deceased)
)
JOAN A. WHELAN (P2487), in her own right as the)
 Mother of **EUGENE MICHAEL WHELAN**,)
 Deceased)
)
RENEE WHITFORD (P2488), in her own right, on)
 behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF MARK P.**)
WHITFORD, Deceased)
)
ROGER WHITFORD (P2489), in his own right as)
 the Father of **MARK P. WHITFORD**, Deceased)
)
 _____)

CAROL WHITFORD (P2490), in her own right as the Mother of **MARK P. WHITFORD**, Deceased)
)
DENNIS WHITFORD (P2491), in his own right as the Brother of **MARK P. WHITFORD**, Deceased)
)
CHRISTOPHER WHITFORD (P2492), in his own right as the Brother of **MARK P. WHITFORD**, Deceased)
)
LISA A. WALKER (P2493), in her own right as the Sister of **MARK P. WHITFORD**, Deceased)
)
STEVE WIESNER (P2494), in his own right as an Injured Party)
)
MICHAEL WILBUR (P2495), in his own right as an Injured Party)
)
MARGARET E. WILKINSON (P2496), in her own right and as the Representative of the **ESTATE OF GLENN E. WILKINSON**, Deceased)
)
BARBARA M. WILLIAMS (P2497), in her own right as an Injured Party)
)
ELIZABETH ANN PAYNE (P2498), in her own right and as the Representative of the **ESTATE OF WILLIAM EBEN WILSON**, Deceased)
)
MAUREEN R. HALVORSON (P2499), in her own right as the Sister of **WILLIAM EBEN WILSON**, Deceased)
)
JEANNE MCDERMOTT (P2500), in her own right as the Sister of **WILLIAM EBEN WILSON**, Deceased)
)
KENNETH WINKLER (P2501), in his own right as an Injured Party)
)
JOHN J. WOJCIK (P2502), in his own right as an Injured Party)
)
CLIFFORD WOLKEN (P2503), in his own right as an Injured Party)
)
WILLIAM E. WOODLON (P2504), in his own right as an Injured Party)

WILLIAM WOYTKIN (P2505), in his own right as an Injured Party)
)
JOHN WRIGHT (P2506), in his own right as an Injured Party)
)
ROBERT E. WRIGHT (P2507), in his own right as an Injured Party)
)
GREGORY WYCKOFF (P2508), in his own right as an Injured Party)
)
HAL YASKULKA (P2509), in his own right as the Son of **MYRNA YASKULKA**, Deceased)
)
BRIAN YASKULKA (P2510), in his own right as the Son of **MYRNA YASKULKA**, Deceased)
)
ADALE PEARL (P2511), in her own right as the Mother of **MYRNA YASKULKA**, Deceased)
)
SHAWN PEARL (P2512), in his own right as the Brother of **MYRNA YASKULKA**, Deceased)
PHILIP PEARL (P2513), in his own right as the Brother of **MYRNA YASKULKA**, Deceased)
)
IVAN PEARL (P2514), in his own right as the Brother of **MYRNA YASKULKA**, Deceased)
)
BONNIE SHIMEL (P2515), in her own right as the Sister of **MYRNA YASKULKA**, Deceased)
)
LORNA KAYE (P2516), in her own right as the Sister of **MYRNA YASKULKA**, Deceased)
)
INA STANLEY (P2517), in her own right as the Sister of **MYRNA YASKULKA**, Deceased)
)
NEIL YELLEW (P2518), in his own right as an Injured Party)
)
THOMAS H. YOUNG (P2519), in his own right as an Injured Party)
)
ANGELO ZECCA (P2520), in his own right as an Injured Party)
)
DENNIS ZIMMERMAN (P2521), in his own right as an Injured Party)

SAUL ZUCKER (P2522), in his own right as the
Father of **ANDREW STEVEN ZUCKER**,
Deceased

SUE ZUCKER (P2523), in her own right as the
Mother of **ANDREW STEVEN ZUCKER**,
Deceased

STUART C. ZUCKER (P2524), in his own right as
the Brother of **ANDREW STEVEN ZUCKER**,
Deceased

GAYLE MOSENSON (P2525), in her own right as
the Sister of **ANDREW STEVEN ZUCKER**,
Deceased

CHERYL SHAMES (P2526), in her own right as the
Sister of **ANDREW STEVEN ZUCKER**,
Deceased

PETER ZUK (P2527), in his own right as an Injured
Party

MOTHER DOE # 52 (AP177), in her own right as
the Mother of **DECEDENT DOE # 52**, Deceased

FATHER DOE # 53 (AP178), in his own right as the
Father of **DECEDENT DOE # 53**, Deceased

MOTHER DOE # 53 (AP179), in her own right as
the Mother of **DECEDENT DOE # 53**, Deceased

BROTHER DOE # 53 (AP180), in his own right as
the Brother of **DECEDENT DOE # 53**, Deceased

SPOUSE DOE # 84 (AP181), in her own right, on
behalf of the Minor Children, and as the
Representative of the **ESTATE OF DECEDENT
DOE # 84**, Deceased

SPOUSE DOE # 85 (AP182), in her own right and as
the Representative of the **ESTATE OF
DECEDENT DOE # 85**, Deceased

DAUGHTER DOE # 85 (AP183), in her own right
as the Daughter of **DECEDENT DOE # 85**,
Deceased

SPOUSE DOE # 86 (AP184), in his own right, on

behalf of the Minor Child, and as the Representative)
 of the **ESTATE OF DECEDENT DOE # 86,**)
 Deceased)
)
SPOUSE DOE # 87 (AP185), in her own right, on)
 behalf of the Minor Child, and as the Representative)
 of the **ESTATE OF DECEDENT DOE # 87,**)
 Deceased)
)
SON DOE # 87 (AP186), in his own right as the Son)
 of **DECEDENT DOE # 87,** Deceased)
)
BROTHER DOE # 87 (AP187), in his own right as)
 the Brother of **DECEDENT DOE # 87,** Deceased)
)
BROTHER DOE # 88 (AP188), in his own right as)
 the Brother of **DECEDENT DOE # 88,** Deceased)
)
SPOUSE DOE # 89 (AP189), in her own right and as)
 the Representative of the **ESTATE OF**)
DECEDENT DOE # 89, Deceased)
)
)
SPOUSE DOE # 90 (AP190), in her own right, on)
 behalf of the Minor Child, and as the Representative)
 of the **ESTATE OF DECEDENT DOE # 90,**)
 Deceased)
)
FATHER DOE # 91 (AP191), in his own right as the)
 Father of **DECEDENT DOE # 91,** Deceased)
)
MOTHER DOE # 91 (AP192), in her own right as)
 the Mother of **DECEDENT DOE # 91,** Deceased)
)
SISTER DOE # 91 (AP193), in her own right as the)
 Sister of **DECEDENT DOE # 91,** Deceased)
)
SISTER DOE # 91 (AP194), in her own right as the)
 Sister of **DECEDENT DOE # 91,** Deceased)
)
JOHN DOE # 92 (AP195), in his own right as an)
 Injured Party)
)
WIFE DOE # 93 (AP196), in her own right, on)
 behalf of the Minor Children, and as the)
 Representative of the **ESTATE OF DECEDENT**)
DOE # 93, Deceased)
)
SISTER DOE # 93 (AP197), in her own right as the)

Sister of **DECEDENT DOE # 93**, Deceased)
))
WIFE DOE # 94 (AP198), in her own right, on)
behalf of the Minor Children, and as the)
Representative of the **ESTATE OF DECEDENT)
DOE # 94**, Deceased)
))
WIFE DOE # 95 (AP199), in her own right and on)
behalf of the Minor Children of **DECEDENT DOE)
95**, Deceased)
))
**ADDITIONAL PLAINTIFFS #1 THRU #5,000)
(AP200 thru AP5,200)**)
))
Plaintiffs,)
))
vs.)
))
**AL BARAKA INVESTMENT AND)
DEVELOPMENT CORPORATION**, a/k/a AL)
BARAKA BANK, a/k/a DALLAH ALBARAKA)
GROUP, LLC (D1))
))
NATIONAL COMMERCIAL BANK (D2))
))
FAISAL ISLAMIC BANK – SUDAN (D3))
))
AL RAJHI BANKING AND INVESTMENT,)
a/k/a AL RAJHI BANK (D4))
))
AL BARAKAAT EXCHANGE LLC, a/k/a AL-)
BARAKAAT BANK (D5))
))
DAR AL MAAL AL ISLAM (D6))
))
AL SHAMAL ISLAMIC BANK, a/k/a SHAMEL)
BANK, a/k/a BANK EL SHAMAR (D7))
))
TADAMON ISLAMIC BANK (D8))
))
**INTERNATIONAL ISLAMIC RELIEF)
ORGANIZATION**, a/k/a ISLAMIC RELIEF)
ORGANIZATION, a/k/a INTERNATIONAL)
RELIEF ORGANIZATION, a/k/a SUCCESS)
FOUNDATION (D9))
))
SUCCESS FOUNDATION, INC. (D10))
))
MOHAMED S. OMEISH (D11))
))
ABDURAHMAN ALAMOUDI (D12))

)

KHALED NOURI (D13))
)
SULAIMAN AL-ALI (D14))
)
ABDULLAH M. AL-MAHDI (D15))
)
TAREQ M. AL-SWAIDAN (D16))
)
ABDUL AL-MOSLAH (D17))
)
SALAH BADAHDH (D18))
)
M. YAQUB MIRZA (D19))
)
SANABEL AL KHEER, INC., a/k/a THE SANA-)
BELL, INC., a/k/a SANABEL AL KHAIR, a/k/a)
SANABIL AL-KHAIR (D20))
)
MUSLIM WORLD LEAGUE, a/k/a RABITA AL-)
ALAM AL-ISLAMI, a/k/a ISLAMIC WORLD)
LEAGUE (D21))
)
MUSLIM WORLD LEAGUE OFFICES)
(D22))
)
ABDULLAH BIN SALEH AL-OBAID (D23))
)
HASSAN A.A. BAHAFZALLAH (D24))
)
YAQUB M. MIRZA (D25))
)
SAAR FOUNDATION, a/k/a SAAR NETWORK)
(D26))
)
ABU SULAYMAN (D27))
AHMED TONJI (D28))
)
HISHAM AL-TALIB (D29))
)
IQBAL YUNUS (D30))
)
JAMAL BARZINJI (D31))
)
M. OMAR ASHRAF (D32))
)
MOHAMMED JAGHLIT (D33))
)
MUHAMMAD ASHRAF (D34))

TAHA JABER AL-ALWANI (D35))
TARIK HAMDI (D36))
YAQUB MIRZA (D37))
SHERIF SEDKY (D38))
AFRICAN MUSLIM AGENCY (D39))
ARADI, INC. (D40))
GROVE CORPORATE, INC. (D41))
HERITAGE EDUCATION TRUST (D42))
INTERNATIONAL INSTITUTE OF)
ISLAMIC THOUGHT (D43))
MAR-JAC INVESTMENTS, INC. (D44))
MAR-JAC POULTRY, INC. (D45))
MENA CORPORATION (D46))
RESTON INVESTMENTS, INC. (D47))
SAAR INTERNATIONAL (D48))
SAFA TRUST (D49))
STERLING CHARITABLE GIFT FUND)
(D50))
STERLING MANAGEMENT GROUP, INC.)
(D51))
YORK FOUNDATION (D52))
RABITA TRUST (D53))
AL-HARAMAIN ISLAMIC FOUNDATION,)
INC., a/k/a AL-HARAMAIN ISLAMIC)
FOUNDATION, a/k/a ISLAMIC AL-HARAMAIN)
(D54))
AL HARAMAIN FOUNDATION (D55))
AL HARAMAIN ISLAMIC FOUNDATION,)

INC. (D56))
AQEEL ABDUL-AZEEL AL-AQEEL (D57))
MANSOUR AL-KADI (D58))
SOLIMAN H.S. AL-BUTHE (D59))
PEROUZ SEDA GHATY (D60))
BENEVOLENCE INTERNATIONAL)
FOUNDATION, a/k/a AL BIR AL DAWALIA,)
a/k/a AL BIR SOCIETY ORGANIZATION (D61))
BENEVOLENCE INTERNATIONAL)
FOUNDATION – USA (D62))
BENEVOLENCE INTERNATIONAL)
FOUNDATION – CANADA (D63))
SYED SULEMAN AHMER (D64))
ENAAM MAHMOUD ARNAOUT, a/k/a)
ABDEL SAMIA, a/k/a ABU MAHMOUD,)
a/k/a ABU MAHMOUD AL SURI, a/k/a ABU)
MAHMOUD AL HAMAWI (D65))
MAZIN M.H. BAHARETH (D66))
SHAHIR ABDULRAOOF BATTERJEE)
(D67))
ZAHIR H. KAZMI (D68))
MUZAFFAR KHAN (D69))
SOLIMAN J. KHUDEIRA (D70))
JAMAL NYRABEH (D71))
WORLD ASSEMBLY OF MUSLIM YOUTH,)
a/k/a WAMY INTERNATIONAL, INC., a/k/a)
WORLD ASSOCIATION FOR MUSLIM YOUTH)
(D72))
IBRAHIM S. ABDULLAH (D73))
MOHAMMAD BIN FARIS (D74))

DR. MAHMOUD DAKHIL (D75))
)
THE GLOBAL RELIEF FOUNDATION, a/k/a)
GRF, a/k/a FONDATION SECOURS MONDIAL,)
a/k/a AL-NAJDA (D76))
)
ABDULLAH BIN LADEN (D77))
)
OSAMA BIN LADEN, a/k/a ABU ABDALLAH)
(D78))
)
TAREK M. BIN LADEN (D79))
)
SAUDI BIN LADEN GROUP, a/k/a BIN LADEN)
CORPORATION (D80))
)
KHALID BIN SALIM BIN MAHFOUZ (D81))
)
**ABDULRAHMAN BIN KHALID BIN)
MAHFOUZ** (D82))
)
SALEH ABDULLAH KAMEL (D83))
)
MOHAMMED AL FAISAL AL SAUD (D84))
)
TURKI AL FAISAL AL SAUD (D85))
)
SULTAN BIN ABDUL AZIZ AL SAUD (D86))
)
SULAIMAN BIN ABDUL AZIZ AL RAJHI (D87))
)
SALEH ABDUL AZIZ AL RAJHI (D88))
)
ABDULLAH SULAIMAN AL-RAJHI (D89))
)
KHALID SULAIMAN AL-RAJHI (D90))
)
YASSIN ABDULLAH AL KADI (D91))
)
MOHAMMAD JAMAL AL KHALIFA a/k/a)
ABU BARAA (D92))
)
ADEL ABDUL JALIL BATTERJEE, a/k/a ABU)
SULAFI (D93))
)
AQUEEL AL-AQUEEL (D94))
)
ABDUL RAHMAN AL SWAILEM (D95))
)

WA'EL HAMZA JAL Aidan, a/k/a ABU AL-
HASSEN AL-MADANI (D96))
)
)
ABDULLAH OMAR NASEEF (D97))
)
)
THE REPUBLIC OF SUDAN (D98))
)
THE REPUBLIC OF SUDAN MINISTRY
OF INTERIOR (D99))
)
THE REPUBLIC OF SUDAN MINISTRY
OF DEFENSE (D100))
)
DELTA OIL COMPANY (D101))
)
NIMIR LLC (D102))
)
)
THIRD AMENDED COMPLAINT
DEFENDANTS)
)
)
ARAB BANK, PLC (D103))
)
DUBAI ISLAMIC BANK (D104))
)
BANK AL-TAQWA LIMITED (D105))
)
AL TAQWA TRADE, PROPERTY AND
INDUSTRY COMPANY LIMITED (D106))
)
AKIDA BANK PRIVATE LIMITED
(D107))
)
AKIDA INVESTMENT CO. LTD. (D108))
ASAT TRUST REG. (D109))
)
BA TAQWA FOR COMMERCE AND
REAL ESTATE COMPANY LIMITED
(D110))
)
GULF CENTER S.R.L. (D111))
)
MIGA-MALAYSIAN SWISS (D112))
)
GULD AND AFRICAN CHAMBER
(D113))
)
NADA INTERNATIONAL ANSTALT
(D114))

NADA MANAGEMENT ORGANIZATION SA (D115)
NASCO BUSINESS RESIDENCE CENTER SAS DI NASREDDIN AHMED IDRIS EC (D116)
NASCO NASREDDIN HOLDING A.S. (D117)
NASCOSERVICE S.R.L. (D118)
NASCOTEX S.A. (D119)
NASREDDIN COMPANY NASCO SAS DI AHMED IDRIS NASREDDIN EC (D120)
NASREDDIN FOUNDATION (D121)
NASREDDIN GROUP INTERNATIONAL HOLDING LIMITED (D122)
NASREDDIN INTERNATIONAL GROUP LIMITED HOLDING (D123)
YOUSSEF M. NADA & CO. (D124)
AHMED IDRIS NASREDDIN (D125)
YOUSSEF M. NADA (D126)
SAUDI AMERICAN BANK (SAMBA) (D127)
TAIBAH INTERNATIONAL AID ASSOCIATION (D128)
MERCY INTERNATIONAL RELIEF AGENCY (MIRA), a/k/a MERCY INTERNATIONAL, a/k/a MERCY (D129)
ARY GROUP (D130)
GLOBAL DIAMOND RESOURCES (D131)
ISLAMIC CULTURAL CENTER OF MILAN, a/k/a CENTRO CULTURAL ISLAMICO DE MILANO, a/k/a ISLAMIC CULTURAL

INSTITUTE OF MILAN, a/k/a ISTITUTO)
CULTURALE ISLAMICO DE MILANO (D132))
)
ISLAMIC CULTURAL CENTER OF GENEVA)
(D133))
)
HANI RAMADAN (D134))
)
THE ADVICE AND REFORMATION)
COMMITTEE (ARC) (D135))
)
THE COMMITTEE FOR THE DEFENSE OF)
LEGITIMATE RIGHTS (CDLR) (D136))
)
PROYECTOS Y PROMOCIONES ISO (D137))
)
AFAMIA SL (D138))
)
COBIS (D139))
)
ABRASH COMPANY (D140))
)
PROMOCIONES Y CONSTRUCCIONES)
TETUAN PRICOTE S.A. (D141))
)
CONTRATAS GIOMA (D142))
)
EUROCOVIA OBRAS SA (D143))
)
MUSHAYT FOR TRADING)
ESTABLISHMENT (D144))
)
PROYECTOS Y PROMOCIONES PARADISE)
SL (D145))
)
PROYECTOS EDISPAN (D146))
)
GHASOUB AL ABRASH (D147))
)
KHALID SHEIK MOHAMMED (D148))
)
RAMZI BINALSHIBH (D149))
)
MUSTAF AHMED AL-HISAWI, a/k/a SHEIK)
SAEED (D150))
)
IMAD EDDIN BARAKAT YARKAS, a/k/a ABU)
DAHDAH (D151))
)
MUHAMMED GALEB KALAJE ZOUAYDI,)

a/k/a ABU TALHA (D152))
)
BASSAM DALATI SATUT (D153))
)
ABDALRAHMAN ALARNAOT ABU ALJER,)
a/k/a ABU OBED (D154))
)
MOHAMMAD KHAIR AL SAQQA, a/k/a ABU)
AL DARDA (D155))
)
GHASOUB AL ABRASH GHALYOUN, a/k/a)
ABU MUSAB (D156))
)
MOHAMMED ALI SAYED MUSHAYT (D157))
)
ABDULLAH BIN ABDUL MUHSEN AL)
TURKI (D158))
)
KHALID AL-FAWWAZ (D159))
)
MOHAMMED HUSSEIN AL-AMOUDI (D160))
)
)
)
ABU QATADA AL-FILISTINI, a/k/a ABU)
ISMAIL, a/k/a ABU UMAR, a/k/a ABU OMAR)
OMAR, a/k/a ABU UMR TAKFIRI, a/k/a ABU)
UMAR UMAR, a/k/a ALI-SAMMAN UTHMAN,)
a/k/a OMAR MAHMOUD UTHMAN, a/k/a UMAR)
UTHMAN (D161))
)
YASSIR AL-SIRRI, a/k/a AMMAR (D162))
)
ABDULLAH AL FAISAL BIN ABDULAZIZ AL)
SAUD (D163))
)
NAIF BIN ABDULAZIZ AL SAUD (D164))
)
MOHAMMED AL MASSARI (D165))
)
LUJAIN AL-IMAN (D166))
)
ZIYAD KHALEEL (D167))
)
IBRAHIM BAH (D168))
)
ABU ZUBAYDAH (D169))
)
AHMED ALI JUMALE (D170))

MAMDOUH MAHMUD SALIM a/k/a ABU)
HAJER AL IRAQI (D171))
OMAR AL BAYOUMI (D172))
ZACARIAS MOUSSAOUI (D173))
ISLAMIC INVESTMENT COMPANY OF THE)
GULF (BAHRAIN) EC (D174))
SAUDI HIGH COMMISSION a/k/a SAUDI)
HIGH RELIEF COMMISSION (D175))
SALMAN BIN ABDULAZIZ AL SAUD (D176))
SHEIK ABDULLAH AZZAM, a/k/a ABU)
MUHAMMED (D177))
ALBERT FRIEDRICH ARMAND HUBER, a/k/a))
AHMED HUBER (D178))
ABDULLAH SALIM BAHAMDAN (D179))
BAKR M BIN LADEN (D180))
OMAR M BIN LADEN (D181))
YESLAM M BIN LADEN (D182))
ALFAISALIAH GROUP, a/k/a AL FAISAL)
GROUP HOLDING CO. (D183))
HASSAN AL-TURABI (D184))
ESSAM AL RIDI (D185))
IBRAHIM BIN ABDULAZIZ AL IBRAHIM)
FOUNDATION (D186))
WADI AL AQIQ (D187))
SOCIETY OF ISLAMIC COOPERATION, a/k/a)
JAM'YAH TA'AWUN AL-ISLAMIA (D188))
OMAR ABU OMAR, a/k/a ABU KUTADA (D189))
ADDITIONAL DEFENDANTS 1-5000)

Defendants.

INTRODUCTION

With the September 11, 2001 attacks on the United States, the threat of international terrorism has become a daily fact of life for every American. The ongoing menace of international terrorism and mass murder has been permanently lodged in the psyche of every civilized person. This new reality calls for action. In response to these acts of barbarism, Plaintiffs herein respond with the collective voice of civilization, and ask for justice under the rule of law.

It is the tradition of a civilized nation to allow redress for wrongs through an appeal to the rule of law and justice. Law is at the foundation of civilization, thus it is particularly fitting that the rule of law respond to attacks of terrorism and savagery. For it is the rule of law and liberty that separate civilization from the barbarism and anarchy extolled by international terrorism. The rule of law is a powerful weapon to be drawn upon in difficult times and to be forged in defense of justice. The United States system of justice, the American people, and the world as a whole have faced enemies more powerful than these terrorists and their sponsors, and will do so again. In taking this action, Plaintiffs herein invoke the rule of law to hold those who promoted, financed, sponsored, or otherwise materially supported the acts of the barbarism and terror inflicted on September 11, 2001 accountable for their deeds. By taking vigorous legal action against the financial sponsors of terror, the Plaintiffs will force these sponsors of terror into the light and subject them to the rule of law.

This civil action seeks to hold those responsible for a more subtle and insidious form of terrorism, that which attempts to hide behind the facade of legitimacy. These entities, cloaked in a thin veil of legitimacy, were and are the true enablers of terrorism. The financial resources and support network of these Defendants – charities, banks, front organizations and financiers – are what allowed the attacks of September 11, 2001 to occur. Terrorists like Osama bin Laden and

his al Qaeda network do not exist in a vacuum. They cannot plan, train and act on a massive scale without significant financial power, coordination and backing. Defendants herein, some of whom act in the shadows, are ultimately responsible for the damages caused by the actions of their terrorist agents and clients.

On September 20, 2001, President George W. Bush addressed a joint session of Congress and made clear the Nation will fight the war on terrorism on all available fronts. The lines drawn on that day were diplomatic, military, political, legal and financial. The war against terrorism is very personal to the Plaintiffs herein. The United States' Congress responded to the call to war by fashioning the Patriot Act of 2001, which strengthens law enforcement's ability to track down terrorists and reaffirms the principles underlying the prior legal rights of individual citizens to pursue justice and punishment against the perpetrators of terror. *Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism, (The USA Patriot Act, Title X, 2001)*. The Patriot Act itself was the culmination of decades of precedent setting judicial decisions and statutory enactments that gave individuals enlarged rights to seek redress and compensation for damages from the sponsors of terrorism. When viewed as a whole, these executive, legislative and judicial actions vastly empower the families herein to seek, win and enforce justice. As one United States court recently noted, "[t]he only way to imperil the flow of money and discourage the financing of terrorist acts is to impose liability on those who knowingly and intentionally supply the funds to the persons who commit the violent acts." *Boim v. Quranic Literacy Institute, et al.*, 291 F.3d 1000 (7th Cir. 2002).

Plaintiffs herein assert statutory and federal common law claims as available to victims' surviving spouses, children, siblings, parents, and legal representatives. Claims herein are brought pursuant to the Foreign Sovereign Immunities Act 28 U.S.C. § 1605(a)(2); § 1605(a)(5);

and § 1605 (a)(7) with Pub. L. 104-208, Div. A. Title I, § 1605 note (West Supp.)(Flatow Amendment); Torture Victim Protection Act, Pub. La. 102-256, 106 Stat. 73 (reprinted at 28 U.S.C.A. § 1350 note (West 1993); Alien Tort Claim Act, 28 U.S.C. § 1350; and the anti-terrorism provisions of 18 U.S.C. § 2333, *et. seq.*, and related federal common law claims. This Complaint includes claims brought by both United States citizens and foreign nationals. Congress' enactment of the terrorist-related statutes set forth herein evidences legislative intent for accountability and provides these victims a forum for that accountability. In addition to accountability and compensation, these legal statutes can also be used to punish and deter future acts of terrorism.¹

The USA Patriot Act of 2001 was enacted to “deter and punish terrorist acts in the United States and around the world, to enhance law enforcement investigatory tools, and for other purposes.” USA Patriot Act of 2001, Title X, § 1001. Congress, by enacting the USA Patriot Act, reinforced this legislative intention to enable victims the ability to deter and punish terrorists acts in the United States and around the world. The Patriot Act makes this message clear:

All Americans are united in condemning, in the strongest possible terms, the terrorists who planned and carried out the attacks against the United States on September 11, 2001, and in pursuing all those responsible for those attacks and their sponsors until they are brought to justice.

USA Patriot Act of 2001, Title X, § 1002.

International terrorism is closely related to genocide, differing only in scope. The same legal rationale for holding responsible the industrialists and bankers of Nazi Germany that

¹ Moreover, the Victim's Compensation Fund is not a bar to terrorist suits. Kenneth Feinberg, Special Master for the Victim's Compensation Fund has stated publicly that Nations harboring terrorists, or promoting terrorism, can be sued by those who participate in the Fund. The Department of Justice, Office of Attorney General has also reiterated victims' rights to pursue actions against terrorists: A claimant who files for compensation waives any right to file a civil action (or to be a party to an action) in any federal or state court for damages sustained as a result of the terrorist-related aircraft crashes of September 11, 2001, *except* for actions to recover collateral source obligations *or civil actions against any person who is a knowing participant in any conspiracy to hijack any aircraft or to commit any terrorist act.*

facilitated the genocide of the holocaust apply to financiers and perpetrators of international terrorism responsible for September 11, 2001. Although this is a civil action for damages that draws upon specific United States statutory enactments aimed at civil remedies for international terrorism (as opposed to a criminal complaint), it nevertheless draws upon the historic precedent and legacy of the Nuremberg Industrialists cases. *See e.g. Trials of War Criminals before Nuremberg Military Tribunals Under Control Council Law #10, Nuremberg, October 1946 - April 1949; Washington D.C.: GPO, 1949-1953; National Archives Record Group 238, M887.* Those cases make clear that responsibility for genocide, and by implication the contemporary offshoot – international terrorism – rests not only with those who pull the trigger, or plant the bomb, or man the airplanes, but with those who facilitated those events through financial or other material means.

In the wake of September 11, 2001, the United Nations Security Council unanimously held that all Nations should act to prevent and suppress the financing or support of terrorism, as well as criminalize the willful provision or collection of funds for such acts. *U.N. Security Council Resolution 1373 (2001)*. The United Nations further resolved that the funds, financial assets and economic resources of those who commit, attempt to commit, participate in, or facilitate the commission of terrorist acts, including persons and entities that act on behalf of terrorists, should also be frozen without delay. *U.N. Security Council Resolution 1373 (2001)*. It is in the spirit of this international consensus of condemnation that Plaintiffs bring this action.

The armed forces of the United States have won an initial victory, in what promises to be a long war on terrorism. The victims and families of the September 11, 2001 attacks should also be able to play their part against those enemies that hide behind the cloak of legitimacy. The monetary lifeblood of the Defendants must be redirected to the ends of religious and political

tolerance rather than be allowed to continue to sponsor and foster international terrorism and butchery. The United States civil justice system is a necessary and important part of this endeavor.

Osama bin Laden and his sponsors, promoters, financiers, co-conspirators, aiders and abettors in the September 11, 2001 terrorist acts are fundamentally rooted in what the overwhelming majority of Islamic thinkers consider to be an illegitimate perversion of Islam. The charitable, financial, religious, and political networks that front terror – the Defendant banks, charities, financial and business institutions – are responsible for the death and injuries of September 11, 2001. These Defendants, who aided, abetted, sponsored, conspired to sponsor, financed or otherwise provided material support to Osama bin Laden, al Qaeda, and international terrorism must be held accountable.

Al Qaeda differs from traditional state-sponsored terrorist groups in a critical way; it is financially robust. As a 2002 independent commission on financing of international terrorism reported:

Building al Qaeda's financial support network was Osama bin Laden's foremost accomplishment, and the primary source of his personal influence. Unlike other terrorist leaders, he was not a military hero, nor a religious authority, nor an obvious representative of the downtrodden and disillusioned. He was a rich financier, both a scion of one of Saudi Arabia's most influential families and a challenger to Saudi Arabia's existing system of governance, distinguished by his ability to organize an effective network.

Al Qaeda's financial network continues to support the organization today, even after being driven from its Afghan base, and allows it to maintain its capacity to attack Americans at home and abroad. As long as al Qaeda retains access to a viable financial network, it remains a lethal threat to the United States.

Organizationally, al Qaeda is notably and deliberately decentralized, compartmentalized, flexible and diverse in its methods and targets. The same description applies to its financial network. If al Qaeda were

financed only by Osama bin Laden's personal inheritance, or only by a small number of state sponsors, and if it were only limited in scope to a small area of the globe, or weren't continuously replenishing its coffers, the problem would be much easier to solve.

Instead, al Qaeda's financial network is characterized by layers and redundancies. It raises money from a variety of sources and moves money in a variety of manners.

Al Qaeda has operated under a cloak of legitimacy – running legitimate businesses, such as the network of corporations Osama bin Laden created when he lived in Sudan, or the honey traders in Yemen that the U.S. government has now publicly identified as being a part of al Qaeda's financial network. Profits earned from these legitimate businesses are then channeled to terrorist ends. Al Qaeda also earns money from a wide range of criminal enterprises.

However, the most important source of al Qaeda's money is its continuous fundraising efforts. Al Qaeda's financial backbone was built from the foundation of charities, nongovernmental organizations, mosques, web sites, fundraisers, intermediaries, facilitators and banks and other financial institutions that help finance the *mujahideen* throughout the 1980s.

In many communities, the *zakat* is often provided in cash to prominent, trusted community leaders or institutions, who then commingle and disperse donated moneys to persons and charities they determine to be worthy. These widely unregulated, seldom audited, and generally undocumented practices have allowed unscrupulous actors such as al Qaeda to access huge sums of money over the years.

Today al Qaeda continues to raise funds from both direct solicitations of wealthy supporters and through retail charities. Some, whose donations go to al Qaeda, know full well the terrorist purposes to which their money will be put.

Once raised in the manners described, al Qaeda's money is moved through a similarly diverse set of mechanisms. The first, and most simple, is the ubiquitous and highly efficient global financial system, including the interconnected network of banks and other financial institutions that undergird the global economy. For years, al Qaeda has been particularly attracted to operating in under-regulated jurisdictions, places with limited bank supervision, no anti-money laundering laws, ineffective law enforcement institutions, and a culture of no-questions-asked bank secrecy.

But al Qaeda did not limit itself to regional money centers; it also took advantage of the globalizing financial system to move its money through banks in virtually every corner of the world, including offshore jurisdictions long known for providing bank secrecy. For instance, in the case of al-Taqwa (a purported international financial services company now the subject of U.S. and international sanctions), al Qaeda moved its funds through accounts in such familiar havens as Liechtenstein and the Bahamas. And the United States has not been immune from al Qaeda money flows: We have all seen the video of Mohammed Atta withdrawing funds from an ATM in South Portland, Maine, on September 10, 2001: funds that were transferred from accounts run by a senior al Qaeda operative, Khalid Sheik Mohammed, in the United Arab Emirates.

Al Qaeda also abuses the Islamic banking system, an entirely legitimate form of investment and finance that abides by *sharia*, or Islamic law, which prohibits the earning or payment of interest. Many prominent Islamic banks operate under loose regulatory oversight, in part because they are based in jurisdictions without proper controls, but also because their religious nature often allows them a greater degree of autonomy owing to obvious domestic considerations. Islamic banks regularly commingle funds from depositors to place them within group investments by fund managers, creating ready opportunities for anonymous money transfers and settlement. Moreover, al Qaeda and other terrorist groups that use Islam to justify their activities are also more likely to find willing collaborators within the Islamic banking system.

Terrorism Financing, Report of an Independent Task Force Sponsored by the Council on Foreign Relations, 2002.

The Report concluded that individuals and charities in Saudi Arabia have been “the most important source” of funds for al Qaeda, and that Saudi officials have “turned a blind eye” to this fact. Clearly, the actions of certain members of Saudi Arabian society and the Saudi Royal family are implicated in the September 11, 2001 attacks and are directly at issue in this case. Osama bin Laden is a naturalized Saudi Arabian whose family still has close ties to the inner circles of the monarchy. Royal denials notwithstanding, Saudi money has for years been funneled to encourage radical anti-Americanism as well as to fund the al Qaeda terrorists. Saudi Arabian money has financed international terrorism while its citizens have promoted and executed it. It is no coincidence that immediately following the September 11, 2001 attacks,

members of the bin Laden family were whisked away from the United States to Saudi Arabia, at a time when commercial aviation was shut down in the United States.

Cash infusions from Saudi Arabia to front groups across the world works to ensure that perverse religious extremism takes hold internationally and in the United States. According to a briefing presented July 10, 2002 to the Defense Policy Board, a group of prominent intellectuals and former senior officials that advises the Department of Defense on policy: “The Saudis are active at every level of the terror chain, from planners to financiers, from cadre to foot-soldier, from ideologist to cheerleader.” *Rand Corporation, Defense Policy Board briefing, July 10, 2002*. Certain entities and individuals in Saudi Arabia promote a culture of violence through the sponsorship of Osama bin Laden, al Qaeda and international terrorism. This culture of violence is also promoted through religious influence.

The Saudis are subjected to religious policing by the religious establishment which is dominated by descendants of Mohammed bin Abdul Wahhab. These religious police, the Committee for the Propagation of Virtue and the Prevention of Vice, exert strict and repressive control over the education system, and every aspect of social and personal behaviour. During the five daily prayers, religious police order shops and businesses to close, while in the mosques clerics rail against non-Muslims, the schools teach hatred, and the Ministry of Islamic Affairs publishes books describing Judaism and Christianity as deviant. The clerics dominate Saudi society, and anyone who talks of democracy, human rights or religious tolerance is put in jail or persecuted. This culture, which promotes hatred, religious intolerance and violence, is the prime enabler of al Qaeda and the growth of international terrorism. Ironically, the Defendants herein are the facilitators of international terrorism who use modern means and the “western” system while trying to destroy them.

A manifesto recently turned over by a captured al Qaeda member is one of the most virulent anti-American tirades appearing to date. The author's name is obviously a pseudonym: Salahuddin Ayyubi, known in the west as Saladin the Kurdish Sultan who reconquered Jerusalem from the crusaders in 1199. The pseudonym however is inaccurate, because Saladin was a soldier of honor embodying true Islamic beliefs and tolerance, unlike the cowardly, twisted and dishonorable murderers of innocents who penned this document. (In the back of the manifesto, there is a claim that it was authored by Osama bin Laden.)

The manifesto discusses the lawfulness from an Islamist point of view of committing acts of terror against Americans and declares that it is legitimate to kill every person, including women and children, and to burn all that can be burned. This genocidal literature tries to legitimize biological and chemical warfare in the service of terrorism, including using nuclear weapons such as a dirty bomb. Terrorism is justified with pseudo-religious arguments, giving historical examples in abundance and richly, if inaccurately, citing to Islamic preachers and teachers of centuries past. Excerpts from the al Qaeda manifesto include:

I say that all the nations of the world have to be looked at concerning their attitude towards Muslims. They are either countries of war, countries with which we are at war, or treaty partners. The basis on which an infidel state rests is that it is inimical and prepared to wage war against us which makes it lawful to fight it by all means necessary.

The prophet also legitimized that a nation such as America is a state at war with us and not a treaty partner and killing of women and the old and children of the war states, when they could not easily be differentiated, is permissible, and it was not possible to get hold of the military personnel, except by killing them [the civilians].

If an infidel is not a treaty partner and not someone to whom Muslim protection is due, then he is in reality a person of war, an enemy to be fought. And it is lawful to shed his blood . . .

Once an infidel is a person of war, killing him is lawful. There is consensus among Muslims today that America has never been a land of

Islam and will never be a treaty partner of Muslims. If we accept that she was a treaty partner, those treaties were bipartisan and today it no longer abides by those agreements.

(From The Truth About the New Crusade By the Vanquisher of the Crusaders)

The perverse reading of Islam, which purports to justify the evil acts of al Qaeda, are outrageous and chilling to any civilized person:

We have not reached parity with them yet. We have the right to kill four million Americans-two million of them children-and to exile twice as many and wound and cripple hundreds of thousands. Furthermore, it is our right to fight them with chemical and biological weapons. America is kept at bay by blood alone. . .

Al Qaeda spokesman Suleiman Abu Gheith, June 12, 2002.

A Short History of al Qaeda

In or around 1989, Osama bin Laden formed al Qaeda, which means “the Base” or “the Vanguard” in Arabic, into an international terrorist group with the aim of opposing non-Islamic governments with violence. Included in Osama bin Laden’s founding vision of al Qaeda was the overthrow of Islamic states that were considered to be too secular, or too beholden to the West. Another goal of al Qaeda was to drive the American armed forces out of the Saudi Arabian peninsula and Somalia. The al Qaeda organization brought together a large number of Arab fighters that had fought in Afghanistan against the Soviet Union. Up to five thousand Saudis, three thousand Yemenis, two thousand Algerians, two thousand Egyptians, four hundred Tunisians, three hundred Iraqis, two hundred Libyans, and numerous Jordanians served alongside the Afghans in attempting to oust the Soviets during the 1980s.

Osama bin Laden went to Afghanistan just after the Soviet invasion in 1979. He became a prime financier, recruiter, and military leader of the Mujahedeen groups. He advertised all over the Arab world for young Muslims to come fight in Afghanistan against the Soviets. He set up recruiting offices all over the world, including in the United States and Europe. These recruiting offices were often run under the auspices of charities which were taking donations from wealthy Saudi families and businessmen. These charities operated in the United States, Europe, Asia, Africa, and the Middle East in furtherance of international terrorism. Charities became an essential part of the support system of al Qaeda and Osama bin Laden, providing the financial resources that enabled them to wage war. The Saudi charitable institutions raised these funds in part through a system of Islamic tithing known as zakat. Zakat, as one of the pillars of Islam, calls for faithful Muslims to give a specified percentage of certain wealth to needy people. Cash funds held in possession for one year require a two and a half percent zakat payment, typically to a charity. The charity is entrusted with managing the donations. However, the charitable

practice of the zakat was perverted by Osama bin Laden as his radical terrorist organization expanded. The financial and logistical support given to al Qaeda by the Defendants funded al Qaeda growth siphoning off charitable donations to sponsor terrorism.

Osama bin Laden paid for the transportation of the new recruits to Afghanistan with some of his personal fortune, and set up camps there to train them. Osama bin Laden brought in experts from all over the world on guerilla warfare, sabotage, and covert operations to train and lead the recruits. Within a little over a year, he had thousands of volunteers in training in his private military camps. After the withdrawal of the Soviets in 1989, these politically and religiously radical and militaristic warriors spread out over the world to their countries of origin. Steeped in a bloody perversion of the concept of Jihad for many years, these individuals were indoctrinated to the point they were not inclined to let go of the militant life they had grown accustomed to during the war. Many took up the radical Islamic cause in their home countries with the aim of destabilizing and overthrowing the more moderate Arab regimes, for not enforcing a “pure” form of Islam.

For example, one thousand of Osama bin Laden’s faithfuls returned to Algeria where they began a nine-year civil war. Those returning to Egypt joined the al-Gama’a al-Islamiyya and the Egyptian Jihad groups determined to overthrow the government of that country. As many as two hundred of Osama bin Laden’s followers settled in New York and New Jersey within the United States; some of these were later implicated in terrorist plots such as the 1993 World Trade Center bombing.² When Pakistan cracked down on al Qaeda members, many of them fled to Asia and joined radical Islamic groups in the Philippines. Some returned to Central Asia to continue the fight against the Russians in Tajikistan, or to other areas such as Bosnia and

² An admitted al Qaeda operative Ramzi Yousef was convicted on murder and conspiracy charges for his role in the plot to topple the trade center's two 110-story towers to punish the United States for its support of Israel.

Chechnya where Muslims were embroiled in conflicts. By this time, Osama bin Laden's funding and support network was in place, and served as a template for the creation and growth of the al Qaeda network. Osama bin Laden simply tapped into the same network formed through his Mujahedeen connections and incorporated those militant individuals and groups under the umbrella title al Qaeda in expanding the base of international terrorism.

In 1991, Osama bin Laden moved to Khartoum, the capital the Republic of Sudan. Here he continued to recruit former fundamentalist warriors into the ranks of al Qaeda and offer them support. In addition to seasoned recruits, new volunteers to his radical cause were given military training and sponsorship in training camps set up there. Soon he had set up Sudanese factories, farms and projects established for the purpose of supplying jobs to those he had recruited. Osama bin Laden built roads and other infrastructure for the Sudanese government with his construction company, al-Hijrah Construction and Development Ltd., and with the support of the Saudi Binladin Group. Osama bin Laden's and the Saudi Binladin Group's money built the airport at Port Sudan, as well as a major highway linking Khartoum to Port Sudan. These projects helped to establish and strengthen Osama bin Laden's relationship with the Sudanese regime. His import-export firm, Wadi al Aqiq, began doing brisk business. Osama bin Laden's Taba Investment Company Ltd. flourished while his agriculture company bought up huge plots of land. The Al Shamal Islamic Bank (or "Al Shamal Bank"), in which Osama bin Laden invested \$50 million, helped finance these thriving companies, as well as overall support for the growing al Qaeda presence within the Republic of Sudan.

Over the next five years, terrorist training activities and recruitment fueled by these economic developments continued, while Osama bin Laden lived in Khartoum under the protection of the Sudanese regime. In 1996, the Sudanese government bowed to pressure from

the United States and requested that Osama bin Laden leave the country. Osama bin Laden was allowed to move back to Afghanistan as an honored guest of the Taliban. For the next five years, with the funding, sponsorship, aiding and abetting of the Defendants herein, Osama bin Laden continued to expand the terrorist training camps that filled the ranks of al Qaeda, and served as bases from which to plan international terrorist attacks.

Al Qaeda members have engaged in a pattern of conduct in planning international terrorist attacks over the past fifteen years. The first such attack was against the United Nations forces in Somalia on October 3 and 4 of 1993, in which eighteen American servicemen were killed and seventy-eight wounded. Osama bin Laden and al Qaeda members also plotted the terrorist bombing of the World Trade Center in 1993, and a plan in 1995 (Project Bojinka) to blow up twelve American airliners simultaneously. The backup plan for Project Bojinka was to hijack planes and use them as missiles against prominent American landmarks such as the World Trade Center, the White House, and the CIA headquarters in Langley, Virginia.

Al Qaeda was also behind the Khobar Towers bombing in Riyadh, Saudi Arabia, in which nineteen American servicemen were killed in November of 1995. After the Khobar attack, inside Osama bin Laden's native Saudi Arabia, a group of prominent Saudis met in Paris where they conspired to pay off Osama bin Laden and his al Qaeda group to ensure that al Qaeda would never again attack within the borders of the Saudi Kingdom. This protection money served to safeguard Saudi Arabia, but also to enlarge the power of Osama bin Laden, al Qaeda, and international terrorism. Subsequent material support including payments to bin Laden and al Qaeda by certain members of the Saudi Royal Family has been verified by a senior Taliban defector.

Emboldened in terrorist ambition, in 1998, Osama bin Laden and al Qaeda orchestrated an attack on the United States embassies in the East African countries of Kenya and Tanzania. These bombings resulted in two-hundred ninety-one deaths and over five thousand injuries. The attack on the U.S.S. Cole in Yemen in October of 2000 then followed, with the brutal attacks on September 11, 2001 thereafter. Osama bin Laden and al Qaeda have publicly and proudly proclaimed direct responsibility for these and other multiple atrocities in furtherance of international terrorism.

Direct attacks on Americans intensified in 1998 after Osama bin Laden issued this “fatwa,” stating:

We -- with God's help -- call on every Muslim who believes in God and wishes to be rewarded to comply with God's order to kill the Americans and plunder their money wherever and whenever they find it. We also call on Muslim ulema, leaders, youths, and soldiers to launch the raid on Satan's U.S. troops and the devil's supporters allying with them, and to displace those who are behind them so that they may learn a lesson.

These words provide an insight into how Osama bin Laden views the world. Osama bin Laden has not left the political intellectual era of the crusades; in this view the Middle East is the battle ground of the world's three major religions, Islam, Christianity, and Judaism. According to Islamic extremist views, a Judeo-Christian alliance has evolved which ultimately aims to conquer the holy places of Mecca, Medina, and Jerusalem. In this distorted reality, this purported alliance is responsible for all hardship and violence inflicted on Muslims throughout history. Following this world view, Osama bin Laden attempts to use terror to demonstrate to fellow Muslims that the “enemies” of Islam can be eliminated from “Muslim” lands such as his native Saudi Arabia. Toward this end, Osama bin Laden has proclaimed his intention to obtain and use biological, chemical, and nuclear weapons to wage war. He seeks these personal or political ends under the guise of religion.

Wahhabism

Wahabbism is an Islamic sect founded by Mohammad Ibn Abdul-Wahhab in the 18th century. Abdul-Wahhab sought to rid Islam of the corruptions that he believed had crept into the religion from both within and without. His doctrine reverted to a strictly literal interpretation of the Koran and Wahhabism, in Abdul-Wahhab's view, became the sole source of legitimate Islamic thought and action. In direct contradiction to the civilized and moderate Arab world – the Wahabbists refused to move beyond outdated ideologies and codes of conduct. The Wahhabi rebellions of the nineteenth and twentieth centuries establishing the power of the sect in Arabia – were defined by their violence and brutality. As the sect took power, the Al Saud family united with the Wahhabi movement, eventually making it the official form of Islam practiced in Saudi Arabia. Hence, the intimate if tenuous relationship between the House of Saud and the Wahabbists.

In recent decades, certain schools of Wahhabism have become even more virulent toward non-Islamic civilization, extolling the virtues of martyrdom for the sake of saving Islam. For example, inflammatory Khutbahs (sermons) given by the Khateeb (preacher) Salaah Al-Budair in the Mosques of Mecca and Medina in August 2001 warned of the imminent threat the West posed to Islamic civilization:

Fellow Muslims! We are nowadays confronted with a relentless war waged by the materialistic western civilization and culture that burns its producers and afflicts them with calamities, misery, immorality, disruption, suicide, and all kinds of evils . . . it is a civilization that races towards creating all means of trouble, disturbance, and destruction.

Al-Budair also emphasizes the greatness of offering to die as a martyr:

Today we Muslims and indeed the entire world can witness the greatness of martyrdom being illustrated in the uprising in Palestine in general and the Al-Aqsaa in particular. This kind of stance, which revives the magnitude and virtues of martyrdom in the heart of the Muslim nation, is exactly what we need at this time. It is vital that the Muslims exert every

effort to spread the love for achieving martyrdom just like the pious early generations of Muslims did. We must continue on the same road that they were on, which is that of our Prophet, and indeed all the prophets before him, in order to support our religion and defeat our enemies.

Revive the importance of martyrdom and reawaken the spirit of seeking it! Instill the virtues of it in the hearts and minds by all methods possible. Our country [Saudi Arabia] has set an example in supporting this and donating generously in its cause from all different sections of the community. . .

Al-Budair finishes up these sermons by justifying suicide bombings:

The Jews are described in the Book of Allah as those who distort words and facts and quote them out of context and this is what they and their supporters from the tyrant regimes all over the world are currently doing. They use false terminology to misguide, confuse, and deceive. What your brothers are committing in Al-Aqsaa are not acts of mindless violence, but rather it is a blessed uprising to resist and curtail the Jewish oppression and aggression: this is a legal right which all religions, ideologies and international laws recognize. Nobody could deny this fact except the ignorant, arrogant, or evildoers.

Such are the perverse Wahabbi sermons currently preached to inspire young men to join forces with Osama bin Laden and al Qaeda in a war against the West. As the former head of counter-terrorism for the FBI (and head of security for the World Trade Center on September 11, 2001) John O'Neill, succinctly stated: "All the answers, everything needed to dismantle Osama bin Laden's organization can be found in Saudi Arabia." The hate-filled ideology of the Wahabbists and Al-Budair confirm John O'Neill's judgement that the ideological, political and financial essence of al Qaeda, the growth of which led to the September 11, 2001 terrorist attacks, stems from certain segments in Saudi Arabia.

This ideology of violence will continue to promote worldwide terrorism until its financial and support network is dismantled. Extremist Wahhabism is inherently dangerous given its propensity to promote non-tolerance and hatred, including the following:

- (1) All non-believers, including non-Wahhabi Muslims, are guilty of shirk and apostasy;

- (2) Only Wahhabi's are true Muslims, all others are non-believers;
- (3) "Jihad" or holy war against all non-believers should be actively encouraged and participated in;
- (4) The only acceptable system of government is an Islamic State based on Sharia—or Islamic law;
- (5) In a strict and often misguided, misinterpreted and wholly unacceptable version—by almost the entire Muslim world—of Sharia law;
- (6) In a purely Islamic world, with no geographic limitations or boundaries.

Put simply, Wahhabists believe they have the right to kill anyone who disagrees with their version of Islam. One Islamic scholar stated: "Wahhabisms evil and twisted interpretation of Islam in and of itself provides sufficient proof of the inherent dangers of Wahhabist ideology." Osama bin Laden and his al Qaeda organization are Wahhabists who have advocated for all of the above Wahhabist beliefs, including killing all non-believers. Wahhabists do not believe in national or governmental boundaries; they seek only one belief system and one world order—and one global Islamic State, based on their ill-founded interpretations of Islam.

In the aftermath of September 11, 2001, fatwas were delivered in Saudi Arabia by Shaykhs Hamud al-Shu'aybi and Abdullah B. Jibrin which attempted to justify the terror attacks. Moreover, certain members of the Saudi Royal family have knowingly and willfully exported Wahhabi ideology in order to convert others and to deflect attention away from Saudi Arabia. Wahhabism has been rejected by almost the entire Muslim world and has been called a threat to Islam itself. Professor Hamid Algar, one of the world's foremost Islamic scholars, stated:

First, in the extremely lengthy and rich history of Islamic thought, Wahhabism does not occupy a particularly important place. Intellectually marginal, the Wahhabi movement had the good fortune to emerge in the Arabian Peninsula (albeit in Najd, a relatively remote part of the peninsula) and thus in proximity of the Haramayn, a major geographical focus of the Muslim world; and its Saudi patrons had the good fortune, in

the twentieth century, to acquire massive oil wealth, a portion of which has been used in attempts to propagate Wahhabism in the Muslim world and beyond.

The majority of Islamic scholars denounce Wahhabist practices. Wahhabist movements, such as the Taliban militia in Afghanistan, have been almost universally criticized by the Muslim world. For example, President Musharraf of Pakistan said of the Taliban: “It is an ignorant, primitive interpretation of Islam that is condemned by the entire Islamic world.” Extremist Wahhabism and the terror and use of violence it promotes, has been condemned by mainstream Muslim scholars and religious leaders as being violent, primitive and inconsistent with the principles of Islam.

These facts are widely known through the Arab world, as it was known that the Taliban was fostering and harboring these extremists. Those entities and individuals that provided material support to the Taliban knew or should have known that they were supporting the al Qaeda terrorist organization and Osama bin Laden. The Taliban openly armed, funded, trained, provided housing, transportation, communication, false documentation, identification, weapons, explosives, personnel, and currency to al Qaeda terrorists. The Taliban knowingly financed terrorist manufacturing facilities, schools and training camps, and harbored known criminals.

Defendants knew or reasonably should have known they were providing material support to terrorists and terrorist organizations who committed the September 11, 2001 savagery that murdered thousands of innocent people. Defendants clearly knew, or clearly should have known, they were providing material support, aiding and abetting and enabling the terrorists that brutalized America and the world on September 11, 2001. By knowingly, purposely, recklessly and in many instances maliciously engaging in international terrorist activity, Defendants acts were a proximate cause of the events of September 11, 2001, for which they are jointly and

severally liable. They must be held accountable. Those providing financial resources and weapons, *inter alia*, to known terrorists who openly pronounced their intention to continue to murder innocent people, specifically American citizens, were on notice of the violence such sponsorship would cause. The sponsorship of international terrorism was reasonably anticipated to cause additional senseless murders of innocent people such as those that occurred on September 11, 2001.

This Complaint is brought pursuant to Rule 42 of the Federal Rules of Civil Procedure, which allows consolidation where actions involve common questions of law or fact. The Plaintiffs herein – United States citizens and citizens of foreign nations – close family members of those killed, including mothers, fathers, wives, husbands, children, sisters and brothers of those killed, along with those injured, on September 11, 2001. Plaintiffs include victims and injured eyewitnesses from each horrific attack, including those aboard all four of the doomed flights, at both Towers of the World Trade Center, inside the Pentagon, and those killed near Shanksville, Pennsylvania. These Plaintiffs seek full, just, timely compensation, treble damages, and punitive damages as appropriate and necessary to deter future acts of international terrorism. Because of the enormity and complexity of Defendants’ collective and individual acts giving rise to liability, Plaintiffs herein provide a somewhat detailed explication of the facts as currently known or believed, which provide an abundant basis for this civil action.

While neither the government of Saudi Arabia nor the United States is a Party to this action, it is recognized that sensitive issues of United States foreign policy may nevertheless be raised, including the question of whether a suit of this nature interferes with or augments United States foreign policy interests. For this reason, it is important to note that it has been widely recognized, including by the United States government, that actions against foreign perpetrators

or facilitators of terrorism is consonant with United States foreign policy objectives. This action comports with vigorously pursuing the war against terrorism, and is consistent with enabling legislation and the jurisprudence regarding the civil liability imposed on behalf of terrorism's victims. As one former national security advisor noted:

The process of discovery in this lawsuit on behalf of 9-11 families can lead to a vital contribution to our national security, and for that reason alone the United States Government should welcome the filing.

(Statement by Richard Allen, former National Security Advisor to President Ronald Reagan.)

Richard Murphy, a former United States Ambassador to Saudi Arabia, recently admitted:

I have never said that the Government of Saudi Arabia is our ally. I have said that we have common interests . . . but that does not include the protection of individual princes.

(Richard Murphy, former United States Ambassador to Saudi Arabia, to NPR Radio.)

As the United States Department of Justice itself argued before the Second Circuit Court of Appeals in a case involving international terrorism:

Any foreign person, entity, or state responsible for the intentional destruction of a U.S. aircraft, particularly one flying to the United States with many U.S. nationals aboard, 'should reasonably anticipated being haled into court' in the United States. Any foreign state must surely know that the United States has a substantial interest in the protection of its flag carriers and nationals in international air travel from the terrorist activity, and can reasonably expect that any action that harmed this interest would subject it to a response in many forms, including possible civil actions in U.S. courts. It is certainly in the interest of fairness and justice to do so.

(Brief by the United States Department of Justice as intervening party in *Rein vs. Libyan Arab Jamahariyah, et al.*, United States Court of Appeals for the Southern District of New York, 1998.)

As President George W. Bush stated in a joint session of Congress on September 20, 2001:

We must starve terrorists of funding, turn them against another, drive them from place to place until there is no refuge or no rest.

The evidence and substantive law in this case require that the sponsors of terrorism will be held accountable, and this is fully consistent with and done in support of United States foreign policy. As one United States government official noted “stopping the money flow is the best way to stop terrorism. Audit trails do not lie, they are the diaries of terror.” Given the gravity of the existing threat and the overwhelming suffering inflicted to date, Plaintiffs herein are committed to uncovering the truth and bringing to justice those who caused the attacks to occur.

JURISDICTION AND VENUE

1. Jurisdiction arises pursuant to 28 U.S.C. §§ 1330(a), 1331 and 1332(a)(2), and 18 U.S.C. § 2338. Jurisdiction also arises pursuant to 28 U.S.C. §§ 1605(a)(2), 1605(a)(5) and (a)(7) (the Foreign Sovereign Immunities Act), 28 U.S.C. § 1350 (“Alien Tort Act”), the Torture Victim Protection Act, PL 102-256, 106 Stat. 73 (reprinted at 28 U.S.C.A. § 1350 note (West 1993)), and 18 U.S.C. §§2334, 2338. This Court also has jurisdiction over claims herein pursuant to 28 U.S.C. § 1367. This Court has both personal and subject matter jurisdiction over the Defendants herein.

2. As herein alleged, actions for wrongful death, permanent personal injury, trauma, loss of consortium, companionship, survival, and related torts perpetrated by a Foreign State, such as The Republic of Sudan, through its agencies, instrumentalities, its officials, employees and/or agents, fall within the exceptions to jurisdictional immunity under 28 U.S.C. §§ 1605(a)(5) and 1605(a)(7).

3. Venue is both proper and convenient in this District pursuant to 28 U.S.C. §§ 1391(d), 1391(f)(4), and 28 U.S.C. § 2334.

PARTIES
PLAINTIFFS

4. Plaintiffs listed in the caption of this action are citizens or residents of the United States of America, and citizens or residents of foreign nations, who lost loved ones on September 11, 2001. Plaintiffs include the Executors, Administrators or Personal Representatives of the Estates of persons killed, along with the close family members, parents, spouses, children and siblings of those lost. Also included are persons injured in the September 11, 2001 terrorist attacks. The attacks utilized commercial aircraft which crashed into the World Trade Center North and South Towers in New York City, the Pentagon in Virginia and a field in Shanksville, Pennsylvania. Plaintiffs' include passengers or crew members on board American Airlines Flights 11 and 77, United Airlines Flights 175 and 93, persons present at both towers of the World Trade Center in New York, and persons present at the Pentagon in Virginia. Plaintiffs herein number over 3,000, and include persons from all walks of life. The names, numbers, residency, familial relationship and additional specific allegations for each Plaintiff can be found in the Appendix to the Third Amended Complaint filed herewith pursuant to F.R.C.P. 15(d) and Case Management Order No. 1, dated October 7, 2002. This Appendix to the Third Amended Complaint is incorporated herein, as if fully set out, by reference.

FACTUAL ALLEGATIONS AGAINST DEFENDANTS

BACKGROUND

5. Plaintiffs incorporate herein all previous paragraphs, including the introduction, and allege herein fully upon information and belief.

6. Osama bin Laden and al Qaeda have admitted responsibility for the September 11, 2001 terrorist attacks.

7. On September 11, 2001, al Qaeda co-conspirators, Mohammed Atta, Abdul Alomari, Wail al-Shehri, Waleed al-Shehri, and Satam al-Suqami hijacked American Airlines Flight 11, bound from Boston to Los Angeles, and crashed it into the North Tower, or Tower One, of the World Trade Center in New York.

8. On September 11, 2001, al Qaeda co-conspirators, Marwan al-Shehhi, Fayez Ahmed (a/k/a Banihammad Fayez), Ahmed al-Ghamdi, Hamza al-Ghamdi, and Mohald al-Shehri hijacked United Airlines Flight 175, bound from Boston to Los Angeles, and crashed it into the South Tower, or Tower Two, of the World Trade Center in New York.

9. On September 11, 2001, al Qaeda co-conspirators, Khalid ad-Midhar, Nawaf al-Hazmi, Hani Hanjour, Salem al-Hamzi, and Majed Moqed hijacked American Airlines Flight 77, bound from Dulles Airport in Sterling, Virginia to Los Angeles, California, and crashed it into the Pentagon in Arlington, Virginia.

10. On September 11, 2001, al Qaeda co-conspirators, Ziad Jarrah, Ahmed al-Haznawi, Saaed al-Ghamdi, and Ahmed al-Nami hijacked United Airlines Flight 93, bound from Newark, New Jersey to San Francisco, California. In an act of defiant courage, the passengers of Flight 93 overtook the hijackers, resulting in its crash in Shanksville, Pennsylvania, prior to reaching its target in Washington, D.C.

11. All nineteen (19) hijackers were members of Osama bin Laden's al Qaeda terrorist group. Fifteen (15) of the nineteen suicide hijackers were Saudi Arabian nationals. All received sponsorship, training, support and funding through Osama bin Laden and his al Qaeda terrorist network. All Plaintiffs herein were killed and injured as a direct and proximate cause of the acts of these criminals, the acts of their al Qaeda co-conspirators and sponsors, and the acts of Defendants herein to sponsor these reasonably foreseeable acts.

12. Defendant and co-conspirator Zacarias Moussaoui (or “Moussaoui”) was born in France of Moroccan descent on May 30, 1968. Before 2001, he was a resident of the United Kingdom. Moussaoui is the alleged “20th hijacker.” Moussaoui was schooled in the United Kingdom and traveled extensively, frequenting many Middle Eastern countries including Afghanistan. In December 2001, a grand jury in the Eastern District of Virginia criminally indicted Moussaoui for acts of international terrorism, specifically the attacks of September 11, 2001.

13. On August 28, 2002, German prosecutors brought charges against co-conspirator Mounir el-Motassadeq (or “el-Motassadeq”), a Moroccan man accused of supporting members of the Hamburg al Qaeda terrorist cell and helping to plan and carry out the September 11, 2001 terrorist attacks.

14. Mounir el-Motassadeq is an al Qaeda co-conspirator. His indictment was the first formal criminal charge brought by German authorities in connection with the September 11, 2001 attacks. El-Motassadeq was arrested in November of 2001 on evidence that he had access to the bank account of one of the suicide hijackers and arranged wire transfers to hijackers while they were learning to fly in the United States. He is charged with participation in the terrorist attacks of September 11, 2001, in the United States.

15. When arrested in 2001, prosecutors said el-Motassadeq was a close associate of Mohamed Atta, one suspected ringleader of the plot. In 1996, el-Motassadeq was one of the witnesses who signed Mr. Atta's will. El-Motassadeq managed the finances of another hijacker, Marwan al-Shehhi, and that the money was used to help al-Shehhi pay for his flight lessons in the United States and cover living expenses there. According to the criminal indictment, these funds were used to support members of the terrorist group al Qaeda.

16. El-Motassadeq admitted that he knew the September 11, 2001, hijackers, but he provided conflicting versions of the nature and intensity of those contacts. At times el-Motassadeq said he knew them only through the Al Quds mosque, which was attended by Atta and other hijackers. On other occasions, he said he had visited the apartment on Marienstrasse where Atta lived. El-Motassadeq and Atta were both students at TUHH University in Hamburg.

17. In July 2000, el-Motassadeq traveled to Karachi, Pakistan for a ‘vacation.’ The Pakistanis later confirmed that he had been in the country at this time and that there were indications that he had visited an al Qaeda camp in Afghanistan. In May 2001, el-Motassadeq visited the Stade nuclear plant near Hamburg, Germany.

The Hamburg al Qaeda Cell

18. In summer of 1999 or earlier, a group of Muslim students in Hamburg joined forces with the express goal of implementing in countries of Western culture, especially in the United States of America, the “Holy War” (“Jihad”) to be propagated by them by means of international terror. The group’s members included Mohammed El Amir Awad Elsayed Atta (or “Atta”), Marwan Yousef Mohamed Rashed al-Shehhi (or “al-Shehhi”), and Ziad Samir Jarrah (or “Jarrah”), (hijackers, all of whom died in the course of the attacks), co-conspirators, or Defendants Ramzi Mohammed Abdullah Binalshibh (a/k/a Ramzi Mohamed Abdallah Omar), Zakarlya Essabar, Said Bahaji, as well as Mounir el-Motassadeq.

19. As a result of the members’ shared religious beliefs, origins and violence-prone Islamic-fundamentalist ideology as well as their close relationships among themselves, the organization was closed to the outside world and is best described as a conspiratorial enterprise, which served as one of the organizational units of an international network of violence-prone radical extremists under the control or guidance of al Qaeda. The organization, which attempted

to present itself as a regular group of foreign students, underpinned its efforts to facilitate acts of terror by a strict mandate to subordinate individual opinions to the group's political goals.

20. Initially, the principal meeting point of the Hamburg cell was the apartment rented by Atta, Bahaji and Binalshibh in Hamburg-Marburg, which temporarily served as al-Shehhi's residence, too. El-Motassadeq, Essabar and Jarrah convened for meetings of the group at this location. In September 1999, the apartment al-Shehhi rented nearby served as an alternative base of operations. In October of 1999, after al-Shehhi and Atta moved into the second apartment, it also became the primary address of el-Motassadeq.

21. In October of 1999 or earlier, the group's members finalized their terrorist scheme, which called for the use of airplanes in "jihad" to kill as many "infidels" in the United States as possible. In order to coordinate details and logistical support with the responsible representatives of the international terrorism network, they resolved to travel to Afghanistan in two groups.

22. In late November of 1999, the three hijackers (Atta, al-Shehhi and Jarrah) and Binalshibh traveled on almost identical dates to the common destinations of training camps run by al Qaeda. Aside from providing training in military operations, the camps served the purpose of heightening radical extremist ideology and fostering an inner resolve among recruits to sacrifice their own lives fighting the "godless enemies." A stint in these camps is regarded as an essential condition of joining the international jihad and belonging to a terrorist group. While al-Shehhi was back in Hamburg for a few days in early January 2000 (only to leave the country again until late March 2000), Jarrah did not return until late January. Atta stayed until late February and Binalshibh re-entered Germany in March 2000.

23. In spring of 2000, a second group traveled to Afghanistan. El-Motassadeq flew from Hamburg to Karachi on May 22, 2000, and returned on August 1, 2000. In the meantime, he underwent military training in a camp near Khandahar, Afghanistan.

24. In accordance with the plans for the attacks discussed in Afghanistan, the three terrorists began making arrangements for pilot training in the United States upon their return. Accordingly, in March 2000, Atta contacted 31 flight schools in the United States via email from Hamburg, inquiring about the possibilities and conditions of flight training for two or three men from different Arab countries. On March 26, 2000, Jarrah signed an agreement to receive pilot training at the Florida Flight Training Center in Venice, Florida, and on March 30, 2000, transferred the amount of 349 German Marks to the account of the flight school's Munich representative.

25. On May 25, 2000, Jarrah applied for a United States entry visa, which he received without difficulties, as Atta had before him, on May 18, 2000. Al-Shehhi had received his United States entry visa from the United States consulate in Dubai, United Arab Emirates (UAE), on January 10, 2000. All three terrorists had previously obtained new passports.

26. Following their entry into the United States (al-Shehhi arrived on May 29, 2000, Atta on June 3, 2000), al-Shehhi and Atta opened a joint bank account on July 18, 2000, with Sun Trust Bank in Venice, Florida, through which they obtained financing and material support for their stay in the United States – from backers within the international terrorist network. On July 7, 2000, they started taking flight lessons together at the flight school Hoffman Aviation in Venice, Florida. By December 21, 2000, they had successfully completed their training, receiving professional pilot licenses from the Federal Aviation Administration.

27. Atta and al-Shehhi then put their acquired skills to the test on a Boeing 727 flight simulator at the Simulations Center in Opa-Locks, Florida, in December 2000, and by taking several exercise flights at the Advanced Aviation Flight Training School in Lawrenceville, Georgia, and at the flight school in Decatur, Georgia, in January and February 2001, respectively.

28. Jarrah entered the United States on June 26, 2000, and, until January 13, 2001, underwent pilot training at the Florida Flight Training Center (F.F.T.C.) in Venice, Florida, where he obtained a private pilot license. Between December 15, 2000, and January 5, 2001, he took flight lessons at the Aeroservice Aviation Center in Virginia Gardens, Florida.

29. The plan of the organization to send Binalshibh to be trained as the fourth pilot alongside Jarrah at the F.F.T.C. in Venice, Florida, was frustrated as Binalshibh's applications for a non-immigrant visa for the United States were denied.

30. To take Binalshibh's place, Essabar was to be sent to the United States to undergo pilot training. Like Atta, al-Shehhi and Jarrah before him, Essabar attempted to obscure his visit to Pakistan by obtaining a new passport from the Moroccan embassy in Berlin on October 24, 2000. But because United States authorities denied Essabar's visa applications, too, this plan could not be realized, either. Instead, it was Zacarias Moussaoui, now detained and indicted in the United States for his involvement in the preparations for the attacks of September 11, 2001, who traveled to the United States following an eight-week visit to Pakistan, and enrolled in flight school. However, due to Moussaoui's arrest on August 17, 2001, he never completed his training.

31. El-Motassadeq and the other al Qaeda co-conspirators who remained in Hamburg, continued to be involved in the preparations for the attacks. In particular, they were responsible

for ensuring that the terrorists and Zacarias Moussaoui had sufficient funds to finance their stay and training in the United States.

32. For the purpose of coordinating the preparations for the attacks between the group members who remained in Hamburg and those who had traveled to the United States, several meetings were held for group members in Germany and Spain. Accordingly, Binalshibh and Jarrah met on January 4, 2001, in Bochum or Dusseldorf. Later, Binalshibh traveled to Berlin to meet Atta, who had arrived there no later than January 6, 2001, after spending time in Spain and returning to the United States on January 10, 2001. Another meeting between Atta and Binalshibh on July 17 or July 18, 2001, in Tarragona, Spain, served the purpose of coordinating the exact times of the attacks.

33. El-Motassadeq, together with Bahaji, acted as the resident administrator of the terror organization in Hamburg. El-Motassadeq's chief responsibility consisted of securing funding for the group's terrorist activities. He made use of al-Shehhi's account, which provided as a source of financing. El-Motassadeq made sure that the account continued to receive sizeable support payments from sources in the United Arab Emirates and elsewhere by transferring semester fees to maintain the status of al-Shehhi as a student, thus securing the latter's right to remain in Germany and meeting the condition of future payments. Shortly before al-Shehhi left for Afghanistan, in late November 1999, el-Motassadeq had also received control over the former's account along with al-Shehhi's bank card, which he used not only to transact financial and other personal business on behalf of al-Shehhi to cover up the latter's absence, but also to distribute the funds needed. He transferred funds from al-Shehhi's to Binalshibh's account which the latter passed on to al-Shehhi in the United States, who used it to finance his flight training. During the absence of al-Shehhi, several cash withdrawals were made to provide

funding for the intended flight training of Binalshibh and Essabar and to benefit other cell members and promote acts of international terrorism.

34. Defendant Khalid Sheik Mohammed is a Kuwaiti of Pakistan descent who has participated in violent acts of international terrorism against Americans since at least 1993. Khalid Sheik Mohammed holds himself out as head of the military committee of al Qaeda. Khalid Sheik Mohammed has publicly taken “credit” for the atrocities of September 11, 2001, as well as the 1993 World Trade Center bombing and the 1995 plot to use airliners as weapons. Khalid Sheik Mohammed aided, abetted, materially supported and conspired with al Qaeda operatives in planning the September 11, 2001 attacks, including Mohammed Atta, Ramzi Binalshibh, and others.

35. Umar Faruq (or “Faruq”) is a high level al Qaeda operative and terrorist co-conspirator. Co-conspirator Faruq was born May 24, 1971, and is a member of the al Qaeda terrorist organization who was arrested in or about May 2002. According to the confession of Abu Zubaydah, top al Qaeda leader detained by the United States authorities, Umar Faruq was senior al Qaeda representative in Southern Asia. An interrogation of Umar Faruq was conducted by United States authorities at the United States air force base in Baghram, Afghanistan, on May 23, 2002.

36. During a custodial interview on Sept 9, 2002, Umar Faruq confirmed that he was al-Qaeda's senior representative to Southeast Asia and was initially sent to the region by Abu Zubaydah and Ibn Sheik Al-Libi to plan large-scale attacks against United States interests in Indonesia, Malaysia, Philippines, Singapore, Thailand, Taiwan, Vietnam and Cambodia. In particular, Faruq prepared a plan to conduct simultaneous car/truck bomb attacks against United States embassies in the region to take place on or about September 11, 2002.

37. Abdelghani Mzoudi is a co-conspirator who provided logistical support to Mohammed Atta and other suicide hijackers. Abdelghani Mzoudi is also alleged to have attended terrorist training camps in Afghanistan in the summer of 2000. He is currently jailed in Germany. Abdelghani Mzoudi provided material logistical support to Ramzi bin al Shibh and al Qaeda.

38. Haji Jamshed is an al Qaeda co-conspirator and a principal financier in the creation and management of al Qaeda training camps.

39. Al Qaeda leader Abd al-Rahim al-Nashiri, one of the network's chief of operations in the Persian Gulf, was recently captured by United States officials. Abd al-Rahim al-Nashiri (a/k/a Umar Mohammed al-Harazi, a/k/a Abu Bilal al-Makki) is a known al Qaeda operative who engaged in acts of international terrorism.

The Banking Defendants

The Islamic Banking System and its Role in International Terrorism

40. Beginning in the late 1970s, upon the receipt of large amounts of wealth, Saudi Arabia and other Gulf countries refined a banking system aimed at promoting and propagation of Islam around the world. The main financial vehicle to fund Islam was set up under the Islamic principle of Zakat, a legal almsgiving required as one of the five pillars of Islam at the standard rate of 2.5% on current assets and other items of income.

41. According to the Koran, only the poor and needy deserve Zakat. But some, for example, Omar Abu Omar (a/k/a Abu Kutada) an al-Qaeda principal in the United Kingdom, have acted to influence a trend to support those fighting the cause of Allah through Zakat funds.

42. As a result, the Zakat legal and religious duty has been usurped and abused by terrorists. John B. Taylor, Undersecretary of Treasury for International Affairs, stated in April

2002, that preventing terrorists from abusing financial institutions was a main goal in the war against terrorism.

43. Most of the Gulf State countries lack effective regulations to impose rules of accounting and auditing. The al Qaeda network extensively relied on funds diverted from the Zakat and other direct donations from sponsors through Islamic banks. Since 1998, Osama bin Laden made regular calls for Muslims to donate through the zakat system to his organization. In December 1998, during an interview with ABC News, he stated that:

Muslims and Muslim merchants, in particular, should give their zakat and their money in support of this state [Taliban regime] which is reminiscent of the state of Medina (Al- Munawwarah), where the followers of Islam embraced the Prophet of God.

44. In September 2001, in a interview with Pakistani newspaper Ummat, he declared that:

Al-Qaida was set up to wage a jihad against infidelity, particularly to counter the onslaught of the infidel countries against the Islamic states. Jihad is the sixth undeclared pillar of Islam. [The first five being the basic holy words of Islam ("There is no god but God and Muhammad is the messenger of God"), prayers, fasting (in Ramadan), pilgrimage to Mecca and giving alms (zakat).].

45. Osama bin Laden himself, in partnership with several Saudi and Gulf Islamic banks, founded a banking institution in Sudan that provided funding for terrorist operations. Several banks helped transferring funds to al Qaeda through the Zakat system, by direct donations, or by knowingly providing means to raise or transfer funds to the terrorist organization. Some banks controlled the Zakat fund beneficiaries, including charities, that have provided financial and logistical support to al Qaeda.

46. Islamic banking facilities, instruments and tools have provided essential support to the al Qaeda organization and operations. The banking Defendants in the lawsuit have acted

as instruments of terror, in raising, facilitating and transferring money to terrorist organizations. In doing so, the banking defendants herein utilize, are part of, and/or are engaged in the international banking system and are subject to its rules, standards and practices.

Al Baraka Investment and Development Corporation

47. Al Baraka Investment & Development Corporation (or “al Baraka”), a wholly owned subsidiary of Dallah Albaraka Group LLC (or “Dallah Albaraka”), is based in Jeddah, Saudi Arabia. Its investments include 43 subsidiaries, mainly banks in Arab and Islamic countries. Most of them are known as or registered as “al Baraka Bank.” United States assets include al Baraka Bancorp Inc. in Chicago, Illinois, and al Baraka Bancorp Inc. in Houston, Texas.

48. A memo from the Russia Federation’s Security Service details the al Baraka Bank’s role in funding Defendant al-Haramain:

On existing knowledge, part of the obtained financing comes from the charitable collections (Zakat) and goes to the personal foreign accounts of field commanders, including Khattab and Basayef.

49. Al Baraka provided Osama bin Laden with financial infrastructures in Sudan beginning in 1983. For example, the use of al Baraka Bank by al-Haramain was confirmed by a statement from al-Haramain chairman, Aqueel al-Aqueel, who declared that the charity maintained accounts at al Baraka Bank in Saudi Arabia.

50. Al Baraka Investment & Development is mostly present in the Sudanese banking sector, through assets held in Algharb Islamic Bank, Al Shamal Islamic Bank, Faisal Islamic Bank, Sudanese Islamic Bank and Tadamon Islamic Bank. Al Baraka is also affiliated with the National Development Bank in Sudan.

51. Defendant Saleh Abdullah Kamel was born in Makkah, Saudi Arabia, in 1941. After being the adviser to the Saudi Minister of Finance, in 1969 he founded Dallah Albaraka

Group LLC, quickly establishing himself as one of the leading promoters of an Islamic financial and banking system capable of rivaling large Western institutions.

52. Dallah Albaraka Group LLC, a diversified conglomerate based in Jeddah, Saudi Arabia, is involved in various industries, services and financial activities. The group includes twenty-three banks in Arab and Islamic countries, in addition to several investment and financial companies.

53. Dallah Albaraka Group LLC's portfolio includes a wholly owned subsidiary specializing in aviation-services, Dallah Avco Trans-Arabia Co Ltd. The company was formed in 1975 and is based in Jeddah, Saudi Arabia.

54. Two of the hijackers on September 11, 2001, of American Airlines Flight 77, Nawaf al Hazmi and Khalid al Mihdhar, received funding from Omar al Bayoumi (a/k/a Abu Imard), a Saudi national who paid their house rent in San Diego. Omar al Bayoumi is listed as a suspect wanted by the FBI in connection with the September 11, 2001 attacks.

55. Omar al Bayoumi was Assistant to the Director of Finance for an al Baraka company, Dallah Avco, a position he gave as a reference in an application for admission to Case Western Reserve University in Cleveland, Ohio in 1998.

56. On May 5, 1998, Omar Al Bayoumi registered a fictitious company name called Masjed al Madinah al Munawarah (a/k/a Masjid al Madinah al Munawarah) based in San Diego, California. In March 25, 1999 a mosque was registered in the State of Pennsylvania under the name of Masjid al Madinah al Munawwarah, Inc.

57. Dallah Albaraka Group LLC's financial arm is al Baraka Investment & Development (or "ABID"), a wholly owned subsidiary based in Jeddah, Saudi Arabia.

58. Saleh Abdullah Kamel, Chairman of Dallah al Baraka and al Baraka Bank, was one of the three founding members of Al Shamal Islamic Bank. Saleh Abdullah Kamel founded the bank in 1983, along with a Sudanese company, Al Shamal Investment and Development, and the Government of Northern State, then controlled by Governor Mutasin Abdel-Rahim, representative of Hassan al-Turabi.

59. The practice and policy of Dallah Albaraka Group LLC and al Baraka Bank is to provide financial support and material assistance to international terrorist organizations including al Qaeda.

60. In 1998, al Aqsa Islamic Bank was established with \$20 million in capital. The main shareholders were Dallah al Baraka Group LLC and the Jordan Islamic Bank. Jordan Islamic Bank, a Dallah al-Baraka LLC subsidiary, owns 14 percent of al-Aqsa Islamic Bank. Saleh Abdullah Kamel acknowledged that Dallah al-Baraka Group LLC owns another twelve percent directly.

61. Since 1998, Israel has refused to approve the bank, citing its obvious ties with known terrorists. At the beginning of 2001, several antiterrorist authorities from Israel visited Citibank's headquarters in New York to warn its directors of the nature of the bank's activities with respect to international terrorism.

62. Al Baraka provided support to the "charity" al-Haramain operations and helped transfer funds for Osama bin Laden operations, as reported by the Bosnian Intelligence Agency (Agency for Investigation and Documentation – AID) in a memorandum titled "Some illegal activities of humanitarian organizations investigated by the relevant investigative bodies of the Federation of Bosnia Herzegovina (FbiH)":

Records available for 1998 show a flow of money into the so-called "operating" account of the HO [Humanitarian Organization] at the Deposit

Bank, Sarajevo, from the “main” account, sent from Saudi Arabia via the Deutsche Bank and the Albaraka Bank in Turkey. The amount is 1,059,687 DEM [\$2.13 million].

63. Al Baraka Turkish Finance House, an al Baraka branch in Turkey, is a subsidiary of Dallah al Baraka Group LLC.

64. A Bosnian Intelligence memo regarding the activities of al-Haramain states the following:

Given all the above security factors, we believe that the clear lack of any concrete humanitarian projects indicates that the existence of this HO [Humanitarian Organization] was a fictitious cover . . .

65. The report establishes al-Haramain’s role in financing and assisting Osama bin Laden’s operations.

[t]he Saudi HO [Humanitarian Organization] al-Haramain, . . . has acted as a channel for financing the activities of terrorist organizations. . . . According to available intelligence, the Sarajevo office assisted the terrorist organization Gama al Islamija, while members of bin Laden’s el Itihad al Islamija (AIAI) terrorist groups were employed at the Somalia offices, which also financed their operations.

66. Additional allegations regarding the charity Defendant al-Haramain are detailed below.

Al Shamal Islamic Bank

67. Al Shamal Islamic Bank was formed in the Republic of Sudan (or “Defendant Sudan” or “Sudan”) on April 1983, and started operations on January 2, 1990, with a paid capital of \$3.9 million. Shares were issued between 1997 and 2000. In or about the same year of the bank’s formation, Osama bin Laden moved several of his Saudi businesses and assets, or extended the reach of these businesses and assets, into the Republic of Sudan (or “Sudan”).

68. A United States’ State Department fact sheet on Osama bin Laden, dated August 14, 1996, notes Osama bin Laden’s operations in Sudan since 1983: “In a 1994 interview, Bin

Ladin claimed to have surveyed business and agricultural investment opportunities in Sudan as early as 1983.”

69. In 1989, Hassan al Turabi installed a radical extremist Islamic government in Sudan through a *coup*. In 1991, Osama bin Laden settled in Sudan, by invitation of Hassan al Turabi and the Sudanese government. A 1996 State Department fact sheet on Osama bin Laden described his operations in the country beginning in 1991:

Bin Ladin relocated to Sudan in 1991, where he was welcomed by National Islamic Front (NIF) leader Hasan al-Turabi. (...) [bin Laden] embarked on several business ventures in Sudan in 1990, which began to thrive following his move to Khartoum. Bin Ladin also formed symbiotic business relationships with wealthy NIF members by undertaking civil infrastructure development projects on the regime's behalf.

70. Osama bin Laden’s close relationship with the new extremist Sudanese regime became symbiotic and he conducted several business projects with or on behalf of the NIF. One of these investments was the Al Shamal Islamic Bank, as reported by the State Department:

Bin Ladin and wealthy NIF members capitalized al-Shamal Islamic Bank in Khartoum. Bin Ladin invested \$50 million in the bank.

71. Osama bin Laden’s involvement in business transactions in Sudan including the Al Shamal Islamic Bank was confirmed by a 2002 Congressional Research Service Report:

In 1991, bin Laden relocated to Sudan with the approval of Sudan National Islamic Front (NIF) leader Hasan al-Turabi. There, in concert with NIF leaders, [bin Laden] built a network of businesses, including an Islamic Bank (al Shamal), an import-export firm, and firms that exported agricultural products. An engineer by training, bin Laden also used his family connections in the construction business to help Sudan build roads and airport facilities. The business in Sudan (...) enabled him to offer safe haven and employment in Sudan to al Qaeda members, promoting their involvement in radical Islamic movements in their countries of origin (especially Egypt) as well as anti-U.S. terrorism.

72. Al Shamal Islamic Bank was founded in 1983 by three individuals or entities: (1) Al Shamal for Investment and Development, a Sudanese company; (2) Defendant Saleh

Abdullah Kamel, Chairman of the Saudi Dallah al Baraka Group LLC; and (3) the Sudanese Government of Northern State, then controlled by Governor Mutasim Abdul-Rahim, Secretary General of the National Congress Party in Khartoum, and representative of extremist Hassan al-Turabi.

73. In April 1984, the Al Shamal Bank issued shares to its main founders. They included the Government of Northern State, the Defendant Faisal Islamic Bank – Sudan, Defendant Saleh Abdullah Kamel, his brother Omar Abdullah Kamel, and Defendant al Baraka Investment and Development (ABID), a wholly owned subsidiary of Dallah al Baraka Group LLC and Defendant Saleh Abdullah Kamel.

74. Among the shareholders of the Al Shamal Bank was Defendant Faisal Islamic Bank – Sudan, a subsidiary of Islamic Investment Company of the Gulf (Bahrain) EC, whose parent company is Defendant Dar-al-Maal al Islami (DMI), based in Switzerland. The three entities are chaired by Defendant Mohammed al Faisal al Saud, and controlled by Saudi investors.

75. Al Shamal Islamic Bank Chairman and shareholder, Defendant Adel Abdul Jalil Batterjee, is the Chairman of al-Bir Saudi Organization, whose United States branch, Benevolence International Foundation (or “BIF”), is also a front for al Qaeda sponsorship.

76. Defendant Adel Abdul Jalil Batterjee is both Chairman of the Al Shamal Islamic Bank and was also Chairman of the World Assembly of Muslim Youth. Batterjee is the subject of an FBI investigation for terrorist activities and is implicated in the criminal indictment of Enaam Mahmoud Arnaout of BIF.

77. Al Shamal Islamic Bank General Manager, Mohammad S. Mohammad, acknowledged in a September 2001 press release that Osama bin Laden had two accounts in the

bank, opened on March 30, 1992 in the name of al-Hijrah Construction and Development Ltd. This company, according to the United States Department of State, worked directly with Sudanese military officials to transport and provide provisions to terrorists training in Osama bin Laden's terrorist training camps in northern Sudan.

78. A third Al Shamal Bank account was opened in 1993 in the name of Osama bin Laden's company, Wadi al Aqiq, a company registered in Saudi Arabia. The import-export firm, in conjunction with Osama bin Laden's Taba Investment Company Ltd., secured a near monopoly over Sudan's major agricultural exports of gum, corn, sunflower, and sesame products in cooperation with prominent NIF members.

79. Al Shamal Bank has repeatedly been used to fund criminal and terrorist activities. A former associate of Osama bin Laden, Jamal Ahmed al-Fadl, testified during the United States trial on the 1998 embassy bombings in Africa, that Osama bin Laden and at least six al Qaeda operatives held bank accounts in Al Shamal Islamic Bank under their real names.

- Q. While you were in the Sudan, did you handle money for Osama bin Laden?
- A. Could you repeat the question.
- Q. Did you work on the finances for al Qaeda while you were in the Sudan?
- A. Yes.
- Q. Did you know where the bank accounts of Osama bin Laden and al Qaeda were?
- A. Yes.
- Q. Do you know whose names they were in?
- A. The bank account under Osama bin Laden in Bank Shaml [al Shamal Islamic Bank], Khartoum.
- Q. That was under Osama bin Laden's true name?
- A. Yes.
- Q. Were there accounts in other names?
- A. Yes. Afad Makkee got account also.
- Q. Afad Makkee, the account that he had under his name, do you know what name that is?
- A. I remember Madani Sidi al Tayyib.

- Q. Do you know of any other persons who had al Qaeda money in their accounts?
- A. Abu Rida al Suri.
- Q. Do you know his true name?
- A. Nidal.
- Q. Anyone else that you knew had al Qaeda money in bank accounts in their name?
- A. Abu Hajer al Iraqi.
- Q. Do you know his true name?
- A. Mamdouh Salim.
- Q. Did you have any accounts in your name?
- A. Shared with Abu Fadhl.
- Q. So you had accounts in your name that were shared with Abu Fadhl?
- A. Yes.
- Q. Do you recall anyone else that had bank accounts in their name for al Qaeda?
- A. Abdouh al Mukhlafi.

80. Jamal Ahmed al-Fadl also testified that al Qaeda operatives received monthly checks of several hundred dollars from Al Shamal Islamic Bank accounts:

- Q. When you worked for Osama bin Laden, in the Sudan, how much were you paid?
- A. \$1,200 . . . per month.
- Q. For how long did you work for him?
- A. Almost two years.
- Q. What banks did he keep his money at?
- A. Bank el Shamar [Al Shamal Islamic Bank].
- Q. Any other banks?
- A. I think he had accounts in different banks, but I only recall Bank Shamar [al Shamal Islamic Bank].

81. Jamal Ahmed al-Fadl also testified that he transferred \$100,000.00 from Al Shamal Islamic Bank to an al Qaeda representative in Jordan:

- Q. How did you carry the \$100,000?
- A. In my bag with my clothes.
- Q. Do you recall what kind of bills the \$100,000 was in?
- A. I remember they all hundred bill.
- Q. Sorry?
- A. They all hundred bill.
- Q. They were all hundred dollar bills?
- A. Yes.
- Q. Who gave you the money?

- A. Abu Fadhl, he bring it from Shamal Bank [al Shamal Islamic Bank] and he bring it to me.
- Q. Abu Fadhl brought it from the Shamal Bank [al Shamal Islamic Bank]?
- A. Yes.

82. During the course of the same trial, another associate of Defendant Osama bin Laden, Essam al Ridi, testified that the Al Shamal Bank was used for al Qaeda operational purposes, stating that "\$250,000 was wired from Al Shamal Islamic Bank" in 1993 via Bank of New York to a Bank of America account held in Dallas, Texas -- where he used it to "buy a plane delivered to bin Laden . . . intended to transport Stinger missiles. . . ." in 1993.

83. Following September 11, 2001, the Chairman of the Senate Armed Services Committee and Chairman of the Permanent Subcommittee on Investigation of the Governmental Affairs Committee testified that Defendant Al Shamal Islamic Bank operations continue to finance and materially support international terrorism and that there are indications that Osama bin Laden remains the leading shareholder of that bank.

Al-Rajhi Banking and Investment Corporation

84. Officially founded in 1987, Defendant al-Rajhi Banking & Investment Corporation, (or "al-Rajhi Bank") has a network of nearly 400 branch offices throughout Saudi Arabia and manages seventeen subsidiaries across the world. Defendant Sulaiman Abdulaziz al-Rajhi is the Managing Director of al-Rajhi Banking & Investment Corporation and Defendant Saleh Abdulaziz al-Rajhi is the Chairman.

85. The al-Rajhi Banking & Investment Corporation is the primary bank for a number of charities that serve as al Qaeda front groups. Al-Haramain Islamic Foundation, the Muslim World League, and the International Islamic Relief Organization all funnel terrorism financing and support through the al-Rajhi Banking & Investment Corporation financial system. One of

the hijackers in the September 11, 2001 attack, Abdulaziz al-Omari, who was aboard American Airlines Flight 11, held an account with al-Rajhi Banking & Investment Corporation.

86. Defendant Sulaiman Abdul Aziz al-Rajhi has a history of financially supporting al Qaeda terrorists. Sulaiman Abdul Aziz al-Rajhi managed the National Commercial Bank budget of the Saudi Joint Relief Committee. The al-Rajhi family is also the primary financier of the SAAR Foundation Network and, as such, is implicated by the SAAR Network's sponsorship of terrorism and Osama bin Laden. Saleh Abdulaziz al-Rajhi has been closely linked to Osama bin Laden's personal secretary and convicted terrorist, Wadih el-Hage. When the Kenyan house of Osama bin Laden's personal secretary, Wadih el-Hage, was raided in 1997, information regarding Saleh Abdulaziz al-Rajhi was discovered. Wadih el-Hage is a known al Qaeda member who was convicted for the 1998 United States Embassy bombings in Kenya and Tanzania.

87. Co-conspirators, agents, aiders and abettors of the al-Rajhi banking scheme to fund or otherwise materially support terrorism include: Sulaiman Abdul Aziz al-Rajhi, Saleh al-Rajhi, Abdullah Sulaiman al-Rajhi, and Khalid Sulaiman al-Rajhi. All of these Defendants do business in and have a significant business presence in the United States, including but not limited to, through al-Watania Poultry, one of the World's largest poultry businesses, and through Defendants Mar-Jac Poultry, Inc., Mar-Jac Investments, Inc. and Piedmont Poultry. They are also material sponsors of international terrorism.

National Commercial Bank

88. The National Commercial Bank (or "NCB") was founded in 1950 by Salim bin Mahfouz. Defendant Khalid bin Salim bin Mahfouz was born in Hadramaut, Yemen, on September 12, 1928. Khalid bin Salim bin Mahfouz is the son of Salim bin Mahfouz, who emigrated to Saudi Arabia in or about 1930. The National Commercial Bank was the first

commercial bank of Saudi Arabia, based in Jeddah. After Salim bin Mahfouz's death in 1986, his son Khalid bin Mahfouz became President and CEO of the National Commercial Bank and remained in that position until 1999, becoming its principal shareholder with control over more than 50% of the bank's capital. The NCB has several wholly-owned subsidiaries, including SNCB Corporate Finance Ltd. in London, SNCB Securities Ltd. in London, and SNCB Securities Ltd. in New York City through which it operates an international banking enterprise.

89. The National Commercial Bank was implicated between 1986 and 1990 in the fraudulent schemes and practices of the Bank of Credit and Commerce International (or "BCCI"). NCB Chairman Khalid bin Salim bin Mahfouz became Chief Operating Officer and major shareholder of BCCI. A 1992 United States Senate Report on the BCCI scheme detailed the role of National Commercial Bank in hiding assets, money laundering, the cover-up and obstruction of a Senate investigation, and sponsoring international terrorism. The National Commercial Bank was used by Osama bin Laden and al Qaeda as a financial arm, operating as a financial conduit for Osama bin Laden's operations. As a former CIA counter-terrorism expert explained in October 2001:

How does the al Qaeda organization fund its worldwide network of cells and affiliated groups? Several businessmen in Saudi Arabia and in the Gulf contribute monies. Much of the money is paid as 'protection' to avoid having the enterprises run by these men attacked. There is little doubt that a financial conduit to Bin Laden was handled through the National Commercial Bank, until the Saudi government finally arrested a number of persons and closed down the channel. It was evident that several wealthy Saudis were funneling contributions to Bin Laden through this mechanism. Now, it appears, that these wealthy individuals are siphoning off funds from their worldwide enterprises in creative and imaginative ways.

90. The bin Mahfouz family businesses are organized through a series of "holding" companies, including a conglomerate, Saudi Economic and Development Company LLC

(Sedco), founded in 1976 and based in Jeddah, and the petroleum company, Nimir Petroleum, which is chaired by Khalid bin Mahfouz's son.

91. Between 1986 and 1990, Khalid bin Salim bin Mahfouz was Chief Operating Officer of the Bank of Credit and Commerce International (BCCI). After several fraudulent practices were discovered, Khalid bin Salim bin Mahfouz was indicted on July 1, 1992, on charges of participation in a Scheme to Defraud in the First Degree in violation of New York Penal Law § 190.65, in connection with certain of Defendant's acts and omissions relative to BCCI Holdings and certain related entities. The indictment alleges a series of misrepresentations, sham loans, and fraudulent conduct in failing to disclose the status of Defendant's interest in BCCI.

92. Under Khalid bin Salim bin Mahfouz, the BCCI was also implicated in supporting international terrorism, as reported by the United States Senate.

In the course of targeting BCCI for laundering drug money, the CIA learned of BCCI's involvement in manipulating certain financial markets, in arms trafficking, and in supporting international terrorism, including handling the finances of Sabri al-Bannah or Abu Nidal, and his terrorist organization.

93. The 1992 Senate investigative Report detailed the initial involvement of the BCCI in terrorism financial supporting terrorism:

BCCI's support of terrorism and arms trafficking developed out of several factors. First, as a principal financial institution for a number of Gulf sheikhdoms, with branches all over the world, it was a logical choice for terrorist organizations, who received payment at BCCI-London and other branches directly from Gulf-state patrons, and then transferred those funds wherever they wished without apparent scrutiny. Secondly, BCCI's flexibility regarding the falsification of documentation was helpful for such activities. Finally, to the extent that pragmatic considerations were not sufficient of themselves to recommend BCCI, the bank's pan-third world and pro-Islam ideology would have recommended it to Arab terrorist groups.

94. A bank audit of the National Commercial Bank conducted in 1998 revealed that over a 10 year period \$74 million dollars was funneled by its Zakat Committee to the International Islamic Relief Organization, headed by Osama bin Laden's brother-in-law.

95. The NCB audit report also stressed various irregularities due to "unreported expenses and loans." It states that "without knowledge of the Zakat Committee, NCB Directors established over the years credit and loans facilities for several charitable organizations, along with banking facilities that were not reviewed by the Committee." Direct donations were received through NCB facilities to the Red Crescent Saudi Committee, the International Islamic Relief Organization and the Muwaffaq Foundation. National Commercial Bank, its agents and employees knew or should have known they were materially sponsoring, aiding and abetting al Qaeda, Osama bin Laden, and international terrorism.

96. The NCB audit report points out a \$3 million dollar transfer to Blessed Relief Foundation, an organization that provided material support of Osama bin Laden and founded by Khalid bin Salim bin Mahfouz. Khalid bin Salim bin Mahfouz was dismissed from the NCB in 1999 soon after the release of the bank's audit report and placed under arrest in Taif. Former CIA Director James Woolsey testified before the Senate Judiciary Committee that along with the financial ties to and support of Osama bin Laden, Khalid bin Salim bin Mahfouz was Osama bin Laden's brother-in-law by virtue of bin Laden's marriage to bin Mahfouz's sister Kaleda. Khalid bin Mahfouz set up various charity organizations around the world since 1991. Every one of these foundations were linked to al Qaeda and involved in the financing and material sponsorship of Osama bin Laden's international terrorist operations.

Dar al Maal al Islami

97. Dar al Maal al Islami (or "House of Islamic Money" or "DMI") is the registered name for DMI Administrative Services SA. The company is headquartered in Cointrin,

Switzerland. DMI Administrative Services SA replaced Dar al Maal al Islami on February 5, 2002, and is its successor in interest. DMI activities started July 29, 1981. Until 1983, DMI was operated under M. Ibrahim Kamel's chairmanship. On October 17, 1983, Prince Mohamed al Faisal al Saud became CEO. Under Mohammed al Faisal al Saud's chairmanship, DMI developed banking, investment and insurance activities in approximately twenty offices around the world. DMI operates broadly in Islamic countries, and investments are conducted strictly under Islamic rules and with an understanding of the terrorist threat. His actions and breach of duty have aided, abetted and provided material sponsorship of the spread of international terrorism and al Qaeda:

The \$3.5 billion DMI Trust, whose slogan is "Allah is the purveyor of success," was founded 20 years ago to foster the spread of Islamic banking across the Muslim world. Its 12-member board of directors includes Haydar Mohamed bin Laden, a half-brother of Osama bin Laden.

98. DMI is currently chaired by Abdulkarim Khaled Uusuf Abdulla who replaced Prince Mohamed al-Faisal al-Saud in early 2002. DMI has involved itself in al Qaeda financing through several of its subsidiaries, including but not limited to, Islamic Investment Bank of the Gulf, Faisal Islamic Bank, Tadamon Islamic Bank, and Al Shamal Islamic Bank.

99. DMI owns 100% of Islamic Investment Company of the Gulf. Mohamed al-Faisal al-Saud chairs Islamic Investment Company of the Gulf. Osama bin Laden's brother, Haydar Mohamed bin Laden, was a director of the company. Islamic Investment Company of the Gulf (Bahrain) EC is the main shareholder of Faisal Islamic Bank of Sudan, chaired by Mohamed al-Faisal al-Saud.

Faisal Islamic Bank – Sudan

100. Faisal Islamic Bank – Sudan, subsidiary of Islamic Investment Company of the Gulf (Bahrain) EC and DMI, was one of the five main founders of Al Shamal Islamic Bank in

April 1984 and became member of the board in July 1988. Mohammed al Faisal al Saud is heavily involved in the sponsorship of terror through Faisal Islamic Bank – Sudan.

101. Defendant Faisal Islamic Bank – Sudan was implicated as an al Qaeda sponsor during the 2001 United States trial on the 1998 embassy bombings in Africa as managing bank accounts for al Qaeda operatives. A former finance manager for al Qaeda in Khartoum, Jamal Ahmed al-Fadl, testified:

Q. Where were the accounts [of al Qaeda] held? In what countries?

A. . . . we got account in Bank Faisl Islami [Faisal Islamic Bank].

Q. Is that also in Khartoum?

A. Yes.”

102. Defendant Faisal Islamic Bank’s subsidiary in Turkey is currently under investigation by the Istanbul Prosecutor’s Office on charges of tax irregularities concerning seven executives. Prosecutors are demanding three years imprisonment for the executives including Defendant Mohammed al-Faisal al-Saud.

Al Barakaat Exchange LLC

103. Al Barakaat Exchange LLC (or “al Barakaat”) is an international banking enterprise based in Dubai, United Arab Emirates, with several branches located around the world. The United States government designated al Barakaat and its branches as terrorist entities on November 7, 2001, and froze the organization’s assets. Two of the United States branches—in Boston, MA, and Alexandria, VA—were accused of racketeering and conspiracy to avoid reporting financial transactions, respectively. The members of the Alexandria branch have pled guilty.

104. Under Secretary for International Affairs John B. Taylor has described al Barakaat as a premier financial transfer system for al Qaeda:

Al Barakaat is a financial conglomerate headquartered in Dubai that operates in 40 countries including the United States. The founder of the

organization, Shaykh Ahmed Nur Jimale, has close links with Usama bin Laden and has used al Barakaat to facilitate the financing and operations of Al Qaida and other terrorist organizations.

105. Treasury Secretary O'Neill corroborated al Barakaat's funding of al Qaeda:

The al Barakaat companies are the money movers, the quartermasters of terror. At core, it is a hawala conglomerate operating in 40 countries around the world with business ventures in telecommunications, construction, and currency exchange. They are a principal source of funding, intelligence and money transfers for bin Laden.

106. Al Barakaat has or had branches in Minnesota, Massachusetts, Ohio and Washington State. All of the al Barakaat Group of companies are co-conspirators, aiders and abettors, material sponsors of al Qaeda, Osama bin Laden and international terrorism.

Tadamon Islamic Bank

107. Defendant Tadamon Islamic Bank was formed in Khartoum, Sudan on November 28, 1981 and started operations on March 24, 1983, less than one month before Al Shamal Islamic Bank obtained banking authorization for its own activities. The Tadamon Islamic Bank is active across Sudanese territory, through twenty-one different establishments and has several subsidiaries in Sudan.

108. Shareholders of the Tadamon Islamic Bank include Al Baraka Investment and Development Corporation (and/or subsidiaries of the Saudi Dallah al Baraka Group) Saleh Abdullah Kamel, National Company for Development and Trade, and Dubai Islamic Bank. Defendant Faisal Islamic Bank Sudan, a subsidiary of the Islamic Investment Company of the Gulf (Bahrain) EC, whose parent is Dar Al Mal Al Islami, was the main shareholder of Tadamon Islamic Bank as of 1995.

109. Tadamon Islamic Bank facilitated, materially sponsored, aided and abetted, and/or conspired with al Qaeda and its international terrorists and financial operations. According to a testimony of former al Qaeda financier in Khartoum, Jamal Ahmed Mohamed al-Fadl, during the

2001 trial regarding the 1998 Embassy bombings in Africa, Tadamon Islamic Bank managed accounts of al Qaeda operatives:

Q. “Do you recall anyone else that had bank accounts in their name for al Qaeda?”

A. Abdouh al Mukhlafi.

Q. Who was this person named Abdouh al Mukhlafi?

A. He is from Yemen.

Q. What role did he play for Bin Laden?

A. He goes with Bin Laden when Bin Laden travel outside or inside Sudan.

Q. What role did he play for Bin Laden when Bin Laden traveled?

A. He is like bodyguard for him, and also if Bin Laden, he needs bank something, he use account for that.

Q. Did he handle money during the travel?

A. Yes.

Q. Where were the accounts held? In what countries?

A. In Sudan and is in Bank Tadamon Islami [Tadamon Islamic Bank].”

110. Tadamon Islamic Bank is also a shareholder of Defendant Al Shamal Islamic Bank, a bank formed in Sudan and extensively used for al Qaeda operations. Tadamon Islamic Bank joined the provisional Board of Directors of Al Shamal Bank on July 1988 and has been a major shareholder of Al Shamal Islamic Bank since March 26, 1986.

Dubai Islamic Bank

111. Dubai Islamic Bank is headquartered in the United Arab Emirates (or “UAE”) and was created in 1975. The Dubai Islamic Bank is chaired by Mohamed Khalfan bin Kharbash, the current UAE Minister of Finance. The Dubai Islamic Bank is a shareholder of Baraka Islamic Bank EC, an affiliate of Defendant Al Baraka Bank. Dubai Islamic Bank is also a shareholder of Defendant Tadamon Islamic Bank in Sudan, which is a shareholder of the Defendant Al Shamal Islamic Bank.

112. Dubai Islamic Bank has a history of illicit money laundering. Dubai Islamic Bank was one of the BCCI’s main shareholders, investing \$80 million. Dubai Islamic Bank was also involved in a number of other illicit financial scandals, including the \$242 million money-

laundering operation through gold trading involving Foutanga (Babani) Sissoko, a billionaire from Mali.

113. In 1999, the United States announced that Dubai Islamic Bank had laundered money for Osama bin Laden. On July 8, 1999, a spokesman for the United States State Department stated that the government of the United Arab Emirates reported that they have taken steps to clean up the Dubai Islamic Bank and to restore its reputation. Asked whether his comment implied that wrongdoing had been occurring at the Dubai Islamic Bank, the State Department spokesman admitted this fact. The Dubai Islamic Bank has engaged in a pattern of conduct that demonstrates aiding, abetting and material sponsorship of international terrorism.

114. The United States State Department also confirmed that a United States delegation traveled to the United Arab Emirates with evidence that Osama bin Laden was channeling funds through the Dubai Islamic Bank. The Central Intelligence Agency had obtained evidence that Osama bin Laden has been allowed to funnel money through the Dubai Islamic Bank.

115. Dubai Islamic Bank is involved in providing financial facilities and support to the terrorists for various anti-American terrorist operations, including the September 11, 2001 attacks. The Dubai Islamic Bank's involvement, support and role in the September 11, 2001 attacks was noted in a draft general report on the economic consequences of September 11, 2001, and the economic dimensions of anti-terrorism, by NATO on April 22, 2002:

It is now apparent that institutions located in United Arab Emirates, the region's most developed and lightly regulated financial center, played a key role in moving resources to those who planned and carried out the 11 September attacks. There has subsequently been much discussion about a traditional trust based means of transferring value; the al Hawala transaction system, which allows clients to move funds internationally without leaving any traces of the operation. The Al Barakaat Hawala operating out of Somalia and the UAE apparently helped to move funds to

the terrorists who carried out the New York and Washington Attacks. al Qaeda had previously used the Dubai Islamic Bank and local Hawala transfer companies to fund the bombings of the American embassies in Kenya and Tanzania.

116. Mustafa Ahmed al-Hisawi (a/k/a Sheikh Saeed), a Saudi national, was Osama bin Laden's chief financial officer during his time in Sudan from 1991 to 1996, before bin Laden went to Afghanistan. In June of 2001, Mustafa al-Hisawi arrived in the United Arab Emirates from Qatar. He left the UAE for Karachi, Pakistan, on September 11, 2001.

117. United States' authorities have identified at least \$500,000 that flowed from overseas sources into United States accounts controlled by some of the hijackers, including transfers from Mustafa Ahmed al-Hisawi to Germany, the United States, and to the banks in the State of Florida in particular.

118. Mustafa Ahmed al-Hisawi held accounts at the Dubai Islamic Bank (and its affiliate and correspondent, Standard Chartered Bank) where money transfers originated to hijackers Marwan al-Shehhi and Mohammed Atta since at least June 2000.

119. For example, on June 29, 2000, \$4,790 was wired from the United Arab Emirates to Marwan al-Shehhi. With it, Marwan al-Shehhi opened up a joint account in his and Mohammed Atta's name at the Florida SunTrust bank. Atta and al-Shehhi also had set up accounts in Dubai, Atta and al-Shehhi, al-Shehhi at a branch office of the Hong Kong Shanghai Bank (HSBC Holdings); Atta at the branch office of Citibank. Money was deposited into these accounts by cash, check or wire from various sources and then transferred to their Florida account by wire.

120. In July 2001, \$109,440 arrived in al-Shehhi and Atta's joint Florida bank account. \$9,985 was sent on July 19th. \$9,485 came on August 7, 2000. \$19,985 came on August 30, 2000. \$69,985 came on September 18, 2000. During this period, Atta and al-Shehhi used the

money to pay for their training at two airports on small aircraft, and other expenses related to the September 11, 2001 attacks.

121. Two days before the terrorist attacks on September 11, 2001, Mustafa Ahmed al-Hisawi received transfers back of "surplus" funds of \$ 15,000 from three of the hijackers, Mohammed Atta, Walid al-Shehri and Marwan al-Shehhi.

122. On September 27, 2001, on United States demand, the Central Bank of the United Arab Emirates announced that it had ordered the freezing of accounts and investments of twenty-six persons or organizations suspected of having contacts with the al Qaeda organization and Osama bin Laden, including the Dubai Islamic Bank.

123. Additionally, on Sept 25, 2001, Luxembourg's commission for supervising financial institutions (Commission de Surveillance du Secteur Financier), issued a regulatory alert naming Dubai Islamic Bank as having links with Osama bin Laden and terrorism.

Bank al-Taqwa Limited

124. Bank al-Taqwa Limited (or "Bank al-Taqwa") was established in the spring of 1988 in Nassau, Bahamas. Shrouded in secrecy, the actual number and locations of its satellite offices is unclear. Bank al-Taqwa has a registered office in Nassau, Bahamas and Lugano, Switzerland, but is reported to have a presence in more than thirty countries. Apparently, Bank al-Taqwa does not maintain offices in the Middle East and does its international banking business through other banking institutions to maintain a presence in the Middle East.

125. Prominent members of the Muslim Brotherhood created Bank al-Taqwa. The bank's President, Youssef Nada, has been a member of the Egyptian Muslim Brotherhood for fifty years. Vice President, Ali Ghalib Himmat, is a long standing member of the Syrian Muslim Brotherhood as well.

126. As an Islamic bank, Bank al-Taqwa is overseen by a Shari'ah board, or religious council. The members of this board include Youssef al-Qardawi, a leading member of the Muslim Brotherhood and Abdel Fattah Abu Ghadda, of the Syrian Muslim Brotherhood.

127. Albert Friedrich Armand Huber (or "Ahmed Huber"), a director of the bank, stated in a 1995 interview that Saudis with money from oil are very active investors in Bank al-Taqwa. An inspection of a list of the shareholders of the Bahamas branch verifies this statement. There are hundreds of shareholders of Bank al-Taqwa, most of whom are from the Gulf State region. Youssef Nada has stated that at the peak of its fourteen year life Bank al-Taqwa controlled \$220 million dollars.

128. On November 7, 2001, Bank al-Taqwa, its affiliated businesses, and its key executives were designated as financial supporters of al Qaeda by President George W. Bush. Along with the designation was a call for the freezing of Bank al-Taqwa's assets. The company's headquarters, two of its satellite offices and a few of the executives' residences were raided as part of the international investigation into the bank's relationship with and sponsorship of Osama bin Laden, al Qaeda, and international terrorism.

129. When President George W. Bush announced the designation of Bank al-Taqwa as part of the al Qaeda financial network, he described Bank al-Taqwa as follows:

Al Taqwa is an association of offshore banks and financial management firms that have helped al Qaeda shift money around the world. Al Taqwa... raise[s] funds for al Qaeda. They manage, invest and distribute those funds. They provide terrorist supporters with Internet service, secure telephone communications and other ways of sending messages and sharing information. They even arrange for the shipment of weapons.

130. President George W. Bush also explained how Bank al-Taqwa works as a front-organization that covertly aids and abets al Qaeda:

They present themselves as legitimate businesses, but they skim money from every transaction for the benefit of terrorist organizations. They

enable the proceeds of crime in one country to be transferred to pay for terrorist acts in another.

131. Bank al-Taqwa was designated as a terrorist entity because it serves, supports and fosters al Qaeda. By curtailing Bank al-Taqwa's operations, President George W. Bush believes that al Qaeda's operations will be curbed as well:

By shutting these networks [al Taqwa] down, we disrupt the murderer's work. Today's action interrupts al Qaeda's communications. It blocks an important source of funds.

...

Today, we've taken another important action to expose the enemy to the light and to disrupt its ability to threaten America and innocent life.

132. Ahmed Idris Nasreddin (or "Nasreddin"), an officer at Bank al-Taqwa, was designated as a terrorist on April 19, 2002, for his role in financially supporting al Qaeda.

133. On August 29, 2002, fourteen additional organizations affiliated with Bank al-Taqwa were designated by President George W. Bush and had their assets frozen for financially aiding and supporting al Qaeda. These organizations were either owned or run by one of the Bank al-Taqwa executives, Youssef M. Nada or Ahmed Idris Nasreddin, who were already designated: Akida Bank Private Limited; Akida Investment Co. Ltd.; Nasreddin Group International Holding Limited; Nasco Nasreddin Holding A.S.; Nascotex S.A.; Nasredding Foundation; Ba Taqwa for Commerce and Real Estate Company Limited; Miga-Malaysian Swiss, Gulf and African Chamber; Gulf Center S.R.L.; Nascoservice S.R.L.; NASCO Business Residence Center SAS Di Nasreddin Ahmed Idris EC; Nasreddin Company Nasco SAS Di Ahmed Idris Nasreddin EC; Nada International Anstalt; and Nasreddin International Group Limited Holding.

134. In the early 1990s, Ahmed Nasreddin, one of the designated Bank al-Taqwa executives, aided the establishment of a mosque highly utilized by the al Qaeda terror network. The mosque, the Islamic Cultural Institute of Milan, Italy, is just across the border from Lugano,

Switzerland. It has acted as a recruiting and coordination center for al Qaeda cells in Europe. The United States Treasury Department issued a press release that describes the Islamic Cultural Institute of Milan as “the main al Qaeda station house in Europe. It is used to facilitate the movement of weapons, men and money across the world.”

135. Nasreddin’s lawyer, P. F. Barchi, admitted that in the mid-1990s Egyptian Secret Service agents warned Nasreddin about potential terrorist problems with the mosque. Barchi also confirms that Nasreddin financially supported the center through charitable donations that were used for rent, utilities and expenses.

136. Youssef M. Nada, one of the terrorist designated Bank al-Taqwa executives, employed the al Qaeda financier and Defendant, Sulaiman Abdul Aziz al-Rajhi. Sulaiman Abdul Aziz al-Rajhi worked for Youssef M. Nada at the Akida Bank in the Bahamas, which has also been designated for providing financial support to al Qaeda. Outside of his role with Akida Bank, Sulaiman al-Rajhi has provided material support and sponsorship to al Qaeda and international terrorism through the al-Rajhi Banking & Investment Corporation and the SAAR Foundation “charities.”

137. Al Taqwa Trade, Property and Industry Company Limited, Akida Bank Private Limited, Akida Investment Co. Ltd., Asat Trust Reg., Ba Taqwa for Commerce and Real Estate Company Limited, Bank Al-Taqwa Limited, Gulf Center S.R.L., Miga-Malaysian Swiss, Guld and African Chamber, Nada International Anstalt, Nada Management Organization SA, Nasco Business Residence Center Sas di Nasreddin Ahmed Idris EC, Nasco Nasreddin Holding A.S., Nascoservice S.R.L., Nascotex S.A., Nasreddin Company Nasco Sas di Ahmed Idris Nasreddin EC, Nasreddin Foundation, Nasreddin Group International Holding Limited, Nasreddin International Group Limited Holding, and Youssef M. Nada & Co. are aiders, abettors, material

sponsors and/or co-conspirators of Bank al-Taqwa Limited and are designated as sponsors of al Qaeda and international terrorism by the United States government.

Arab Bank, PLC

138. Arab Bank, PLC operates an international banking system that is used regularly by al Qaeda's Spanish cell for transfers of cash to members of al Qaeda operating in Germany, Pakistan, Afghanistan, Lebanon, Yemen, Bosnia, and elsewhere. Several of the recipients of cash transfers through Arab Bank PLC have been incarcerated or are being sought as key members of the al Qaeda organization with direct ties to the hijackers and terrorists who perpetrated the September 11, 2001 attacks. Arab Bank PLC has materially supported, aided, abetted and financed al Qaeda.

139. In mid-1996, Osama Darra and Mohamed Needl Acaid [presently incarcerated in Spain] managed a commercial establishment named Decomisos Mardini in Madrid. They made fraudulent use of credit cards, defrauding amounts totaling 1,947,8974 Spanish Pesetas and 7,419,490 Spanish Pesetas, with the aim of applying the amounts obtain to financing and supporting al Qaeda. Throughout the latter half of 1996, Mohamed Needl Acaid remited through Arab Bank, PLC numerous cash transfers to Islamic extremists associated with Chej Salah (chief recruiter for terrorists recruited from Spain in Peshawai, Pakistan). Arab Bank has branch offices in United States, including in New York, New York, and across the world.

Saudi American Bank

140. Saudi American Bank is based in Riyadh, Saudi Arabia, and was formed in 1980 pursuant to a royal decree to take over the then existing branches of Citibank in Riyadh and Jeddah, Saudi Arabia. Citibank had opened its Jeddah branch in 1955 and its Riyadh branch in 1966. Saudi American Bank was formed in accordance with a program adopted by the Kingdom

of Saudi Arabia in the mid-1970's under which all foreign banks were required to sell majority equity interests to Saudi nationals.

141. Saudi American Bank started operations on July 12, 1980, based in Riyadh. The Saudi American Bank is chaired by Abdulaziz Bin Hamad Al Gosaibi. Khalil A. Kordi and Rashid M. Al. Romaizan are among the directors of the bank. The Saudi American Bank is the second largest bank in Saudi Arabia.

142. The Saudi American Bank has offices in the United States based in New York. The Chairman of the bank is Abdulaziz Bin Hamad Al Gosaibi who was born in 1923 is also Chairman of the Saudi Cement Company in Damman, Saudi Arabia. The Saudi Cement Company shareholders include Defendant Omar Sulaiman Al-Rajhi. The Saudi American Bank is also the main banker of Arab Cement Company. The company is owned by Al Rajhi Group and Saudi Binladin Group. Arab Cement Company is managed by several other Defendants including Khalid bin Salim bin Mahfouz and Mohammed Bin Laden.

143. The Saudi American Bank is the official correspondent of the al Baraka Bank Lebanon, based in Beirut and chaired by Defendant Saleh Abdullah Kamel. The Saudi American Bank has maintained a partnership with al Baraka financial system since its beginning.

144. The Saudi American Bank serves as the bank for the Dallah al Baraka Group, named as Defendant herein and chaired by Defendant Saleh Abdullah Kamel. The Saudi American Bank is close to the Saudi Bin Laden family, and appears on its financial transactions. Binladin for Contracting and Trading is owned by members of the Bin Ladin family including Bakr Bin Laden and Mohammed Bin Laden.

145. Regarding the construction of infrastructure in Sudan while Osama bin Laden was training and developing al Qaeda terrorists, the Saudi Binladin Group offered material support.

The Public Buildings and Airports Division of Saudi BinLadin Group participated in the construction of the Port Sudan Airport, and Mohamed BinLadin Organization (or “BinLadin Organization”) provided a technical assistance to major road construction. The Saudi BinLadin Group confirmed publicly these two collaborations with Sudan during al Qaeda’s and Osama bin Laden’s tenure there.

146. Saudi American Bank financed these Sudanese works directly providing material support and assistance to Osama bin Ladin. Indeed, Saudi American Bank was the main banker of the Saudi BinLadin Group and BinLadin Organization with respect to Sudanese operations. Saudi American Bank is also the Riyadh correspondent of al Faisal Islamic Bank, which is managed by Defendant Mohamed al Faisal al Saud. Al Faisal Islamic Bank has facilitated al Qaeda terrorist operations as detailed herein. The Saudi American Bank is also the main correspondent in Riyadh for a branch of Al Shamal Bank, a branch of DMI Trust based in Nassau, involved in the financing of al Qaeda.

147. In year 2000, the Saudi American Bank participated in the fund raising campaign in Saudi Arabia for collecting donations to the “heroes of the Al Quds uprising” (Intifada) by providing a bank account and facilities to receive donations for a committee of charity organizations including Defendants World Assembly of Muslim Youth, International Islamic Relief Organization and al Haramain Foundation.

148. Defendnat al Barakaat was able to penetrate the United States banking system with the help of Ahmed Ali Jumale (or “Jumale”). Employed by Barakaat Boston, Ahmed Ali Jumale, is a Somali financier who founded Barakaat and was a close associate of Osama bin Laden. From 1979 to 1986, Jumale worked in Jeddah, Saudi Arabia as a senior employee of the

Saudi American Bank. The bank was founded by Citibank, which owned 40% of it at the time he worked there.

149. Ali Ghaleb Himmat, Ahmed Huber, Mohamed Mansour, Zeinab Mansour-Fattouh, Ahmed Ali Jumale, Ahmad I. Nasreddin and Youssef M. Nada (a/k/a Youssef Mustafa Nada) are aiders, abettors, material sponsors and/or co-conspirators of international terrorism.

THE CHARITY DEFENDANTS

The Charity Fronts of Terror

150. Shortly after September 11, the United States Treasury Department designated a number of charities as terrorist entities and froze their assets. These included the Rabita Trust, al-Haramain, al-Rashid Trust, Wafa Humanitarian Organization, and others. Furthermore, the Treasury Department froze the assets of the Benevolence International Foundation and the Global Relief Foundation. Many of these charities are Saudi funded. Then, in a series of raids over two days in March 2002, federal and local officials stormed the offices of several locations in Virginia and Georgia. These locations housed numerous charities that funnel money to and from al Qaeda. Certain of these entities are under criminal investigation or indictment.

151. Islamic extremists have usurped charities as a means to raise funds and travel the world easily and efficiently. Numerous charities around the world have been pinpointed as used for terrorist purposes. Some have been shut down, while others have continued to thrive, raising new funding for international terrorist activities.

152. As an organization, al Qaeda began with Mekhtab al Khidemat (Arabic for the “Office of Services”), which was a purported charitable organization with offices all over the world. In the United States indictment of al Qaeda and Osama bin Laden for the 1998 United States Embassy bombings in East Africa, the government noted that:

[Al Qaeda] grew out of the “mekhtab al khidemat” organization which had maintained offices in various parts of the world, including Afghanistan, Pakistan (particularly in Peshawar) and the United States, particularly at the Alkifah Refugee Center in Brooklyn, New York.

153. The charity Defendants in this action are used as terrorist fronts, to mask money transfers and provide cover for terrorist operatives.

Al-Haramain Islamic Foundation, Inc.

154. The Saudi Arabian-based al-Haramain Islamic Foundation Inc. (or “al-Haramain”) is a private charitable organization that is supposed to provide a variety of humanitarian services for Muslims worldwide. Established in Riyadh in 1992, al-Haramain quickly developed a vast network of offices and representatives that now spans over fifty countries, including the United States. Al-Haramain raises most of its funds from Saudi Arabia where it oversees the distribution of its resources across the world.

155. Although al-Haramain incorporates in many of the countries in which it operates these branches are still controlled primarily from al-Haramain’s headquarters in Riyadh, Saudi Arabia. The President and Vice-President of the United States branch, Aqeel al-Aqeel and Mansour al-Kadi, both reside in Riyadh, Saudi Arabia where they run all of al-Haramain worldwide. Defendant al-Haramain Islamic Foundation, Inc., is a Saudi charity front that has exploited its non-profit status for the benefit of Osama bin Laden and his terrorist network al Qaeda, in the furtherance of international terrorism. In doing so, al-Haramain has developed an extensive worldwide network. Many of al-Haramain’s foreign branches have been exposed for providing direct and material support to al Qaeda. The United States State Department has designated two of al-Haramain’s branches located in Bosnia and Somalia, as terrorist entities and frozen the assets of both. The leaders of al-Haramain have direct links to al Qaeda.

156. In December of 1999, al-Haramain conducted a joint fundraising event with a known al Qaeda front, the Defendant International Islamic Relief Organization (IIRO) and suspected front, the World Assembly of Muslim Youth (WAMY) in Riyadh, Saudi Arabia. Al-Haramain and its co-conspirators also solicit and operate widely in the United States.

157. Co-conspirators, aiders and abettors of the al-Haramain Islamic Foundation doing business or registered to do business in the United States include Defendants: Al Haramain Foundation; Al Haramain Islamic Foundation, Inc.; Aqeel Abdul-Azeel al-Aqeel; Mansour al-Kadi, Soliman H.S. al-Buthe; and Perouz Seda Ghaty.

Al-Haramain's Humanitarian Efforts Used to Conceal Support for al Qaeda

158. Al-Haramain's self-titled "Most Important Aims" include relief work in areas of the world where Muslims are deprived. An unwritten, though no less important, aim of al-Haramain is providing assistance to Osama bin Laden's al Qaeda.

159. Intelligence officials throughout the world have acknowledged that al-Haramain exploited its non-profit status in secreting its aid to terrorist groups. In referring to al-Haramain in a speech given on March 11, 2002, United States Treasury Secretary Paul O'Neill, stated:

Few deceits are more reprehensible than the act of collecting charity from well-intentioned donors, and then diverting those funds to support hatred and cruelty. As I said during my visit to the Gulf, misusing charity funds to support terrorism harms the people who gave the donation, harms the people who should have received it and is dangerous to us all. Organizations that pervert the name of charity are an affront to us all, and we will find them, expose them, and shut them down.

160. After the June 2, 2002, raids of al-Haramain offices in Bosnia, the Commander of the NATO-led forces in Bosnia, Lieutenant General John Sylvester stated:

We detected a pattern here . . . for terrorist cells and those who aid and harbor them to operate behind the shield of legitimate humanitarian . . . organizations.... They were preaching good, and sometimes doing good, while plotting evil.

161. On March 11, 2002, the United States froze the funds of the Bosnia-Herzegovina and Somalia branches of the al-Haramain Islamic Foundation. These branches of al-Haramain were “diverting charitable funds to terrorism.” The United States Treasury Department issued a Press Release about the designations that stated:

The branch offices of al Haramain in Somalia and Bosnia are clearly linked to terrorist financing.

162. Although al-Haramain in Saudi Arabia was not included in this designation, the Bosnian and Somalian branches receive their funding and guidance from the al-Haramain headquarters in Riyadh, Saudi Arabia.

163. Al-Haramain’s Bosnia and Somalian offices and the rest of al-Haramain are closely intertwined. Al-Haramain’s headquarters provides the funding, management, and direction of the Somalian and Bosnian branches. The headquarters also maintains one website that covers al-Haramain worldwide and, on occasion, devotes certain pages of its website to certain individual branches.

164. A United States Treasury Department Press Release stated that al-Haramain worked with the al Qaeda linked Somali-based terrorist group al-Itihaad al-Islamiya and the al Qaeda financial vehicle al-Barakaat Bank. The press release states:

The Somalia office of al-Haramain is linked to Osama bin Laden's al Qaeda network and al-Itihaad al-Islamiya (AIAI), a Somali terrorist group. al-Haramain Somalia employed AIAI members and provided them with salaries through al-Barakaat Bank, which was designated on November 7, 2001 under E.O. 13224 because of its activities as a principal source of funding, intelligence and money transfers for Osama bin Laden.

165. The cooperation between al Qaeda and al-Itihaad al-Islamiya has not ceased. The 2002 United States Department of State’s Patterns on Global Terrorism report states that al-Itihaad al-Islamiya is a terrorist group that maintains ties to al Qaeda. The Treasury Department

Press Release about the designation also states that al-Haramain's support of al-Itihaad al-Islamiya has been concealed under its humanitarian cover:

Over the past few years, al-Haramain Somalia has funneled money to AIAI by disguising funds as if they were intended for orphanage projects or Islamic school and mosque construction. The organization has also employed AIAI members and provided them with salaries through Barakaat Banks and Remittances, a subsidiary of al-Barakaat Bank.

166. This concert of action, aiding and abetting of terror and material sponsorship of international terrorism is precisely the hallmark of the offensive upon the United States that culminated on September 11, 2001.

Al-Haramain's Ties to al Qaeda's 1998 United States Embassy Bombings

167. The al-Haramain Islamic Foundation was banned from Kenya for national security concerns following the 1998 embassy bombings. Osama bin Laden and al Qaeda were convicted by the United States in 2001 for plotting and executing these dual attacks in Nairobi, Kenya, and Dar Es Salaam, Tanzania, which killed 224 people, including 12 Americans, and injured more than 4,000. These indictments and convictions demonstrate the United States government's belief that both Osama bin Laden and al Qaeda have committed acts within and outside the United States which trigger the United States District Courts' jurisdiction over such entities.

168. The United States Treasury Department Press Release following the March 11, 2002, designation of al-Haramain's Bosnian and Somalian offices, stated the following about its connection to the terrorist group al-Gama'a al-Islamiyya:

The Bosnia office of al-Haramain is linked to al-Gama'a al-Islamiyya, an Egyptian terrorist group. Al-Gama'a al-Islamiyya was designated on November 2, 2001 and it is a signatory to Osama bin Laden's Fatwah dated February 23, 1998, targeting Americans and their allies.

169. In March 2002, Bosnian officials raided al-Haramain's Sarajevo office and discovered more proof of al-Haramain using its humanitarian image as a cover for terrorism. A Bosnian intelligence report explains how investigators discovered that al-Haramain's financial records from 1994 through 1998 had been destroyed and that \$1.59 Million dollars had been inexplicably withdrawn from the charity between 1999 and 2001. The Bosnian intelligence report about the March 2002 raids also stated: "We believe that the clear lack of any concrete humanitarian projects indicates that the existence of this organization was a fictitious cover for probable links with terrorism." In 2001, the Saudi-based al-Haramain aided al Qaeda terrorists groups in Chechnya and elsewhere by providing them with recruits, weapons, and money.

170. Al-Haramain's website used to have a direct link to the al Qaeda site about the Chechnyan operations (qoqaz.com). The website is part of the al Qaeda propaganda organization, Azzam Publications group of websites, including qoqaz.com, qoqaz.net, and azzam.com (among others). The government of the United States has been tracking the domains of azzam.com and qoqaz.com in an ongoing effort to shut-down the sites for their role as an al Qaeda sponsor, promoter and mouthpiece. FBI Special Agent Robert Walker described qoqaz.net, the English-language equivalent of qoqaz.com, in his April 29, 2002, Affidavit in Support of Complaint Against Benevolence International Foundation, Inc. and Enaam M. Arnout. In his Affidavit, Walker stated that qoqaz.net leverages its relationship with charities:

In or about early 2000, a website (www.qoqaz.net) dedicated to the cause of Chechen mujahideen identified the leaders of the military fight in Chechnya as including Ibn al Khattab and included pictures of mujahideen training as well as killed mujahideen. CW-1 has identified Ibn al Khattab as a well-known mujahideen leader with links to Osama bin Laden. . . .

The website condemned America . . .

171. Shortly after the merger of Egyptian Islamic Jihad with Osama bin Laden's al Qaeda (*See* Sudan allegations, *infra*), Ahmed Ibrahim al-Najjar, initially a member of the Egyptian Islamic Jihad, was sent on a new mission to Albania to work for al-Haramain. After al-Najjar was deported from Albania to Egypt in 1999, he was sentenced to death for acts of terrorism. In his testimony, al-Najjar admitted to being a full-fledged al Qaeda member who entered Albania with a false passport and who, like many other al Qaeda operatives, was engaged in purported humanitarian activities while waiting for new orders to act. The case of al-Najjar is but one example of a senior al Qaeda operative who not only found refuge from authorities with al-Haramain, but a platform from which to wage war and promote the use of terror.

172. Al-Haramain took part in a committee of charitable organizations that formed the Saudi Joint Relief Committee (or "SJRC"). Along with al-Haramain, the SJRC is comprised of the IIRO, WAMY, the Saudi Red Crescent, and the Muslim World League, among others. The SJRC has been connected to Osama bin Laden and two of his top operatives, Wa'el Hamza Jalaidan and Adel Muhammad Sadiq bin Kazem. The United States Treasury Department has branded Jalaidan a Specially Designated Global Terrorist Entity [SDGT], stating that Jalaidan is "an associate of Usama bin Laden and a support of al-Qa'ida terror." Al-Haramain has been able to continue its cooperation with al Qaeda for years in large part due to its ostensible appearance as a humanitarian organization.

173. In the United States, al-Haramain has three business entities in Ashland, Oregon: al-Haramain Foundation, al-Haramain Islamic Foundation, and al-Haramain Islamic Foundation, Inc. All three of these separately filed businesses are at the same address and under the same management. These three businesses are one and the same as al-Haramain's headquarters in

Riyadh, Saudi Arabia. The President and Vice-President of the United States branch, Aqeel al-Aqeel and Mansour al-Kadi, are the Secretary General and Deputy General, respectively, of the Riyadh office. The al-Haramain branch in Ashland, Oregon, is specifically linked to al Qaeda operations.

174. Al-Haramain Ashland states in its year 2000 Form 990 that it operates an Islamic center in Springfield, Missouri. Corporate records reveal that al-Haramain owns property in Springfield, Missouri.

175. Al-Haramain has been implicated as providing funds for the bombing of a night club in Bali in 2002. Al-Haramain continues in its illicit pattern of conduct in sponsoring acts of international terrorism.

Al Haramain role in funding international terrorism is ongoing and demonstrates a pattern of conduct

176. During an interrogation conducted by United States authorities at the United States air force base in Baghram, Afghanistan, on May 23, 2002, Umar Faruq, senior al Qaeda representative in Southern Asia, confessed that al-Haramain was the main financial mechanism for funding terrorists operations in the region, through its Indonesian office director in Jakarta, Ahmed al-Moudi. The al-Haramain organization is said to have planned terrorist attacks in Indonesia.

Al Haramayn was the funding mechanism of all operations in Indonesia. Money was laundered through the foundation by donors from the Middle East. Money was given to [him] to al Harmayn's branch in Jakarta, which he said is connected to Kompak [*Crisis Center Committee or Committee for Crisis Handling of the Dewan Dakwah Islamiyah organization, Islamic Propagation Council in Indonesia*]. The two groups plan terrorist activity in Indonesia. The foundation had an office in Makassar where Faruq was introduced to the foundation's head by Agus Dwikarna [*Director of Kompak*]. Faruq was given orders by Rashid [*al-Qaida senior officer*] to get money transferred to the foundation's office in Jakarta through Ahmed al-Moudi [*head of al Haramayn's office in Jakarta*].

177. Umar Faruq further stated that al-Haramain received money from a Saudi Sheikh (Sheikh Bandar), who heads the al-Haramain Islamic Foundation in Saudi Arabia according to Faruq.

[*Sheikh Bandar*] gave \$99,000 to Faruq to give to Al Moudi. Faruq said Sheikh Bandar was the head of Al Haramayn in Saudi Arabia.

178. Furthermore, during a custodial interview on September 9, 2002, Umar Faruq stated that terrorist operations of Jemaah Islamiya (founded by Abu Bakar Bashir), an Islamic extremist group closely associated with al Qaeda were funded by donations channeled through al Haramain Islamic Foundation:

Al Qaeda encourages Basyir's [*Abu Bakar Bashir*] goal to spark a religious civil war in Indonesia in order to achieve his vision of a pure Islamic state under Islamic law. Basyir's plan of training jihadists and massing weapons and ammunition has been coordinated with Rashid, a senior lieutenant of Usama bin Ladin. Rashid also acts as a representative of a committee of Gulf-state sheiks who are Al Qa'ida financiers and who have committed ample funds, weapons, ammunition and computers to support this war. Funds are channeled through the Al-Haramayn NGO.

179. Al-Haramain is engaged in unlawful aiding, abetting, conspiring with and offering material support to al Qaeda which constitutes an unlawful pattern of conduct, illicit scheme and enterprise.

Benevolence International Foundation Inc.

180. The Benevolence International Foundation (a/k/a Al Bir al DaWalia) (or "BIF"), headquartered in Palos Hills, Illinois, purports to be an international charity organization involved in fundraising for charitable causes. BIF was incorporated in the State of Illinois as a non-profit organization on or around March 30, 1992. One of the directors listed on the incorporation documents is Defendant Adel Abdul Jalil Batterjee (a/k/a Adil Abdul Galil Batargy) (or "Baterjee"). BIF has offices in Pakistan, Bosnia, Azerbaijan, Tajikistan, Yemen, Bangladesh, Turkey, Dagestan, Georgia, China and Ingueshetia.

181. The organization is also known as “al Bir al Dawalia,” which translated from Arabic means “Benevolence International.” It was originally founded in the 1980’s by a wealthy Saudi Arabian national named Adel Abdul Jalil Batterjee, who was an associate of Osama bin Laden. Defendant Adel Abdul Jalil Batterjee later transferred control of the organization to the current Chief Executive Officer Enaam M. Arnaout (or “Arnaout”). Defendant Enaam Arnaout has been affiliated with BIF since at least 1992, and was criminally indicted for his role in sponsoring al Qaeda through diversion of charitable funds to sponsor al Qaeda.

182. Adel Abdul Jalil Batterjee is a wealthy Saudi Arabian businessman. He has investments across a number of different industries including commercial, property, medical, industrial, and contracting. This business is done primarily through the family’s business, the Batterjee Group, but also through other investments and businesses. Recent attempts to locate Batterjee in Saudi Arabia have failed and it is currently believed that he may be in the Sudan.

183. Batterjee originally met Arnaout in 1987 when Arnaout was teenager studying Islam in Pakistan. Batterjee appointed Arnaout as the head of the Bosnian branch in the early 1990s. According to Benevolence International Foundation’s 1992 articles of incorporation, Adel Batterjee is one of the three founders of BIF in the United States. In 1993, the Saudi Government closed Batterjee’s charity al-Birr at the same time it was closing other organizations for ties to terrorism. Following this closing, Batterjee moved the BIF headquarters to Chicago, Illinois and brought Arnaout in from Bosnia to run the organization. Batterjee officially transferred control of the organization to Enaam Arnaout on September 15, 1997, when Arnaout assumed the Executive Director position.

184. Adel Batterjee’s name does not readily appear in any Benevolence International Foundation corporate records after 1994, yet he continued funding the foundation. On February

12, 2002, the United States Government recorded a telephone conversation that the now jailed CEO of BIF, Enaam Arnaout, had with his brother Hisham in Saudi Arabia. During this conversation, Arnaout discusses “Abu Sulafa” with his brother. The United States government has identified the name “Abu Sulafa” as an alias for Adel Batterjee. Using Batterjee’s alias, Arnaout states the Batterjee has been sending money to Benevolence International Foundation’s branches:

EA: And the man [Abu Sulafa], may God reward him with goodwill, he loves goodwill, so he does not want to boycott the offices, (UI) the offices, he is sending them wire transfers. So, if, if I receive a wire transfer from him, to any office of the offices, my home is destroyed.

H: Yes, meaning, should I tell him not to send a thing.

EA: Tell him, oh brother, now, they want, now scrutinizing on what is our relation to Saudi Arabia.

...

EA: So I want you to talk to Abu Sulafa, tell him “Enaam is telling you, that oh beloved brothers, the scrutiny now is on a Saudi connection.”

(EA: Enaam Arnaout, H = Hisham, Arnaout’s brother)

185. One Justice Department al Qaeda expert suggested that this telephone conversation may further elucidate Batterjee’s role as the source of the “mysterious set of wire transfers” that contributed \$30,000 to \$40,000 to BIF each month. Investigators have tracked the wire transfers to a Swiss Bank account registered to a Cayman Islands corporation.

186. Evidence introduced in the criminal trial of United States v. Usama Bin Laden, et al., Case Number S98 Cr. 1023, United States District Court, Southern District of New York, and gathered in the related investigation, demonstrated that al Qaeda sought and received a substantial amount of financial support from numerous international sources for the procurement of equipment (including weapons and communication equipment), recruitment, training, transportation, and lodging, among other support and expenses. In addition, al Qaeda terrorists

received training in how to avoid law enforcement and intelligence scrutiny and to travel surreptitiously. They are also taught to avoid putting matters in writing. Al Qaeda members have held positions with BIF and this charity is one of the organizations utilized by al Qaeda.

187. Once money was withdrawn from the bank accounts of relief organizations, its use by al Qaeda can be virtually untraceable. According to an affidavit of Special Agent Robert Walker of the FBI, an al Qaeda witness explained that the money would almost always be withdrawn in cash, and the relief organizations from whose account the money was taken would generate paperwork which indicated that all the money was being used for charitable purposes such as building mosques or schools, or providing clothing for the poor. According to this affidavit, only a portion of the money withdrawn was actually used for the purposes stated by the relief organizations. The remaining funds were provided to al Qaeda for whatever use al Qaeda deemed necessary. This is consistent with evidence adduced at the 1995 trial in the Southern District of New York of persons convicted of seditious conspiracy involving the 1993 plot to attack various buildings in New York and with the overall evidence. Al Qaeda operatives and supporters have also smuggled money into the United States.

188. On or about March 19, 2002, law enforcement authorities in Bosnia-Herzegovina searched eight locations affiliated with BIF, including BIF's offices in that country. The documents recovered included documents establishing direct communication between Enaam Arnaout and Osama bin Laden and others in the late 1980's and early 1990's. The documents included a disk found at BIF's office in Bosnia which included scanned images of these documents.

189. On December 16, 1994, Defendant Mohamad Jamal Khalifa, while traveling with the aforementioned Bayazid, was detained in San Francisco by American officials. At the time,

Mohamad Jamal Khalifa had been living for a substantial period of time in Manila, the Philippines, and was affiliated with a number of entities, including a non-government organization known as Benevolence International Corporation (or “BIC”) and the International Islamic Relief Organization (or “IIRO”). At the time of his travel, Mohamad Jamal Khalifa had been convicted in absentia in Jordan for his alleged involvement in 1993 and 1994 in a series of bombings of public places in Jordan. Two of the principal participants in the bombing were Jordanians who had spent time with Mohamad Jamal Khalifa in the Philippines but who had then returned to Jordan to conduct these bombings and contemplated assassinations. Mohamad Jamal Khalifa was then retried – and acquitted – after his extradition from San Francisco to Jordan following the December 1994 stop. At his Jordanian trial, Mohamad Jamal Khalifa admitted to the Jordanian authorities that he had known the bombers and had sent them money.

190. Mohamad Jamal Khalifa, alias “Abu Baraa,” is referenced on a document recovered in the searches of BIF locations in Bosnia in March 2002. On or about November 19, 1998, telephone toll records indicate that BIF’s Illinois office was in telephonic contact with a telephone number in Saudi Arabia used by Khalifa.

191. Financial records obtained from Citibank indicate that in the four month period from January 4, 2000, to April 11, 2000, BIF sent nineteen (19) wire transfers from its checking account, number 980110435, in the amount of \$685,560.

192. A folder recovered in another BIF search in December 2001, indicated handwritten notations in Arabic which included the statements:

Contribute with your mujahideen brothers to repel the Crusader-Zionist attack on Muslim lands.

Steeds of war projects.

193. The reference to “steeds of war projects” is an apparent reference to a verse in the Koran which reads: “Against them [the enemies] make ready your strength to the utmost of your power, including steeds of war, to strike terror into the hearts of the enemies”

194. On April 21, 1999, evidence recovered by the FBI from BIF’s office in Palos Hills, Illinois, included, among other things, a copy of a February 1999 article in the Seattle Times concerning small pox as a biological terrorism weapon. The sections of the text indicating that federal, state and local authorities are poorly prepared for a biological attack involving smallpox were highlighted. In none of BIF’s advertisements of its humanitarian causes has it ever indicated that it was dealing with the issue of small pox in any country.

195. BIF claims to be a charitable organization but in fact is engaged in the support of various persons and groups involved in military and international terrorist activity.

196. Enaam Arnaout has a relationship with Osama bin Laden and many of his key associates dating back more than a decade, as evidenced by cooperating witnesses and seized documents. BIF is an organization that al Qaeda has used for logistical support, including the movement of money to fund international terrorist operations. Various persons involved in terrorist activities, specifically including persons trying to obtain chemical and nuclear weapons on behalf of al Qaeda have had contacts with Benevolence International Foundation offices and personnel.

197. Benevolence International Foundation has had direct dealings with representatives of the Chechen insurgents as well as Hezb e Islami, a military group operating at various times in Afghanistan and Azerbaijan. Benevolence International Foundation made efforts to provide the Chechen mujahideen with money, an X-ray machine, and anti-mine boots, among other material support.

198. On December 14, 2001, searches were conducted of the offices of Benevolence International Foundation in Palos Hills, Illinois, and in Newark, New Jersey, along with the home of its chief executive officer, Enaam M. Arnaout, removing materials from each place. According to a government witness, Enaam M. Arnaout was planning in March 2002, to leave for Jeddah, Saudi Arabia.

199. Also on December 14, 2001, the Treasury Department's Office of Foreign Asset Control (or "OFAC") issued an order blocking Benevolence International Foundation's assets and records, pending further investigation into BIF's ties to terrorists. Enaam M. Arnaout, Chairman of Benevolence International Foundation, has a relationship with Osama bin Laden and key associates dating back more than a decade. The Benevolence International Foundation is used by al Qaeda for logistical support: terrorists attempting to obtain chemical and nuclear weapons on behalf of al Qaeda have contacts with the Benevolence International Foundation and its office personnel; and, Benevolence International Foundation has had direct dealings with al Qaeda operatives, providing them with military and financial support. Defendant Arnaout has been criminally indicted for his role in the September 11, 2001 attacks due to his sponsorship of al Qaeda.

200. In the latter part of the 1980's, an al Qaeda organization known as "mekhtab al khidemat" (the "services office") maintained offices and facilities in various parts of the world, including Afghanistan, Pakistan and the United States. The organization was operated principally by Sheik Abdullah Azzam and Osama Bin Laden for purposes including the providing of logistical support to the mujahideen (fighters) in Afghanistan.

201. In the mid to late 1980s, Defendant Enaam Arnaout, using various aliases including "Abu Mahmoud," "Abu Mahmoud al Suri," "Abu Mahmoud al Hamawi," and "Abdel

Samia,” worked with and for mekhtab al khidemat and LBI to provide assistance to various mujahideen including those under the command of Osama Bin Laden.

202. Within that same time frame, Defendant Arnaout served as director of communications in the “al Masada” mujahideen camp in Jaji, Afghanistan, under the direction of Osama Bin Laden. Defendant Arnaout distributed resources, including weapons, at the direction of Osama Bin Laden and others.

203. Defendant Arnaout and his co-conspirators fraudulently solicited and obtained funds from charitable donors and prospective donors to the BIF Enterprise by falsely representing that the BIF Enterprise would use donated funds solely for humanitarian purposes, with a small amount being used for administrative expenses, while concealing the material fact that a portion of the money raised by the BIF Enterprise was being used to support groups engaged in armed confrontations and violence overseas.

204. Defendant BIF and Arnaout and co-conspirators used BIF’s status as a charity and a tax-exempt organization to lessen scrutiny by various governments concerning the financial and other activities of the BIF Enterprise’s employees and agents, the BIF Enterprise’s overseas offices, and the travel of the BIF Enterprise employees, agents, and associates.

205. Defendant Arnaout and BIF co-conspirators kept secret from governments and the general public, including a significant number of donors, material facts about Defendant Arnaout’s relationship with organizations engaging in violence, including al Qaeda and Osama Bin Laden.

206. Defendant BIF and Arnaout and his co-conspirators agreed to conduct financial transactions, affecting interstate and foreign commerce, by wire transferring funds from BIF’s checking accounts in Illinois to bank accounts in various locations, including New Jersey and

accounts outside the United States, knowing that the property involved in the transactions represented the proceeds of specified unlawful activities, namely, mail and wire fraud in violation of Title 18, United States Code, Sections 1341 and 1343, with the intent to promote the carrying on of unlawful activities and material support to organizations engaged in violent activities, in violation of Title 18, United States Code, Section 2339A; and knowing that the transactions were designed, in whole or in part, to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of unlawful activities. Defendant BIF and Arnaout and co-conspirators agreed to transport, transmit, and transfer monetary instruments and funds from a place in the United States to or through a place outside the United States with the intent to promote the carrying on of a specified unlawful activity, namely, the material support to organizations involved in violent terrorist activities.

207. Defendant BIF and Arnaout and co-conspirators agreed to provide and attempt to provide material support and resources to persons, groups and organizations engaged in violent terrorist activities, including al Qaeda, and to conceal and disguise the nature, location, source and ownership of material support and resources, knowing and intending that they were to be used in preparation for and in carrying out acts of international terrorism violation of Title 18, United States Code, Section 2339A.

208. Defendant BIF and Arnaout and co-conspirators corruptly endeavored to influence, obstruct and impede the due administration of justice by submitting to the United States District Court false and misleading declarations.

209. BIF and Arnaout engaged in a conspiracy, the method and means of the conspiracy included the following, among other illegal activities.

210. In or about 1992, Defendant Arnaout assisted in delivering, assembling and operating a satellite telephone for use in Afghanistan by Gulbuddin Hekmatyar and Hezb-e-Islami.

211. Sometime in 1993 or thereafter, members of the international terrorist conspiracy caused the production of videotapes depicting fighters in Bosnia-Herzegovina and eulogizing dead fighters, including al Qaeda members and soliciting donations to support international terrorism.

212. On or about June 10, 1995, BIF caused the delivery of an X-ray machine and currency from the BIF Enterprise to a representative of the Chechen mujahideen in Baku, Azerbaijan.

213. In or about November 1995, Defendant Arnaout and other members of the BIF conspiracy caused the shipment of anti-mine boots to Baku, Azerbaijan, ultimately destined for the Chechen mujahideen. Defendant Arnaout and BIF members solicited donations from the public to purchase additional anti-mine boots for the mujahideen, falsely claiming that the project was for the benefit of civilians.

214. In or about May 1998, BIF and Arnaout facilitated the travel of an influential founding member of the al Qaeda network, Mamdouh Mahmud Salim (a/k/a Abu Hajer al Iraqi), to Bosnia-Herzegovina by indicating that Salim was a director of BIF.

215. In the latter part of the 1990's, with Defendant Arnaout's knowledge, Saif al Islam el Masry (a/k/a Abu Islam el Masry), a member of al Qaeda's majlis al shura (consultation council), as well as a top military expert and instructor, served as an officer of the BIF.

216. Between June 2000 and September 2001, BIF caused the transfer of approximately \$1,414,406.00 via wire from an account at Union Bank of Switzerland to BIF's

checking account in the United States. Those funds were commingled in BIF's checking account with donations the BIF Enterprise received from other sources and disbursed in large part to the BIF Enterprise offices overseas.

217. In or about October 2001, Defendant Arnaout relayed to the BIF founder Adel Batterjee in Saudi Arabia via telephone Arnaout's concern that Arnaout was under scrutiny of the United States government and in particular the fact that Defendant Arnaout had been searched at the airport upon his return to the United States.

218. In January 2002, following the blocking of BIF's bank accounts by the United States Department of the Treasury, Defendant Arnaout spoke via telephone to Adel Batterjee in Saudi Arabia, and Batterjee requested Defendant Arnaout to relocate with his family to Saudi Arabia.

219. Beginning at a time unknown through in or about March 2002, Defendant Arnaout, and employees of the BIF Enterprise, possessed, and attempted to erase in part, in Bosnia-Herzegovina, among other items, an archive of documents and photographs concerning Osama Bin Laden and al Qaeda, including:

- i. a chart of an organization involved in military activity headed by Osama Bin Laden;
- ii. notes summarizing several meetings during which al Qaeda was formed in Afghanistan in August 1988 (indicating that Osama Bin Laden, Abu Ubaidah al Banshiri and Mamdouh Salim, a/k/a "Abu Hajar al Iraqi," among others, were in attendance), and specifying the text of the original bayat (oath of allegiance) made by prospective al Qaeda members to al Qaeda;
- iii. notes reflecting the commencement of al Qaeda's "work" on or about September 10, 1988;
- iv. personnel files of the mujahideen trained in the al Masada camp in Jaji, Afghanistan, in or about 1988, which contained the true names and aliases and military experience of the trainees;

- v. a list of wealthy sponsors from Saudi Arabia including references to Osama Bin Laden and Adel Batterjee, the founder of the BIF Enterprise;
- vi. various documents reflecting Defendant Arnaout's involvement in the acquisition and distribution of hundreds of rockets, hundreds of mortars, offensive and defensive bombs, and dynamite, as well as disguised explosive devices in connection with the al Masada camp;
- vii. various documents in a separate folder reflecting Defendant Arnaout's participation in obtaining missiles, bombs and mortars in 1989 and 1990 in connection with Hezb e Islami;
- viii. various newspaper articles including a 1988 article with a photograph depicting Osama Bin Laden, Defendant Arnaout, and one of the founders of the BIF Enterprise; as well as 1998 articles concerning Osama Bin Laden's threats against the United States and the State Department's 1997 list of designated terrorist organizations;
- ix. a handwritten organizational chart placing Defendant Arnaout at the top of a jihad organization involved with weapons; and
- x. In or about late 2001 and early 2002, while the BIF Enterprise continued to solicit and receive donations from the public while fraudulently holding itself out as a humanitarian organization that had never supported or financed violence, Defendant Arnaout falsely and publicly stated that he did not know Osama Bin Laden personally, that Defendant Arnaout never fought against the Soviet Union, that Defendant Arnaout was never at the al Masada camp.

220. On March 26, 2002, in an effort to obtain a court order requiring, among other things, the release of BIF funds frozen by the United States Department of the Treasury, BIF and Defendant Arnaout submitted a declaration knowingly and falsely stating: "BIF has never provided aid or support to people or organizations known to be engaged in violence, terrorist activities, or military operations of any nature. BIF abhors terrorism and all forms of violence against human beings."

221. On or about April 15, 2002, Arnaout spoke to the BIF director in Pakistan and advised him to avoid government scrutiny in Pakistan by fleeing to Afghanistan with the BIF's money and to evade detection by refraining from the use of banks, telephones or electronic mail.

222. Enaam M. Arnaout conspired with others to provide material support and resources to persons, groups and organizations engaged in violent terrorist activities, including al Qaeda, and persons engaged in violent confrontations and to conceal and disguise the nature, location, source and ownership of material support and resources, knowing and intending that they be used in preparation for and in carrying out acts of international terrorism in violation of Title 18, United States Code, Sections 2339A and 2 and other criminal statutes.

223. Defendant Arnaout and other members of the BIF conspiracy agreed to transfer by wire funds from BIF's checking accounts to bank accounts in various locations, including New Jersey and accounts outside the United States, which involved the proceeds of specified unlawful activities.

224. Enaam M. Arnaout conducted and attempted to conduct a financial transaction, affecting interstate and foreign commerce, namely, transferring by wire approximately \$4,000 from BIF's checking account at Citibank FSB to Fleet Bank in Newark, New Jersey, knowing that the property involved in the transaction represented the proceeds of a specified unlawful activity, namely mail fraud in violation of Title 18, United States Code, Section 1341, with the intent to promote the carrying on of the mail fraud and wire fraud; in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

225. Enaam M. Arnaout for the purpose of executing a scheme to defraud knowingly caused an envelope containing a donation check in the amount of \$1,620 to be delivered by the United States Postal Service according to directions thereon, from a corporation to:

Benevolence International Foundation
9838 S. Roberts Rd. #1W
Palos Hills, IL 60465

226. Enaam M. Arnaout for the purpose of executing a scheme to defraud, knowingly caused an envelope, containing a donation check in the amount of \$1,000 to be delivered by the United States Postal Service according to directions thereon, from a corporation to:

Benevolence International Foundation
9838 S. Roberts Rd. #1W
Palos Hills, IL 60465

227. Enaam M. Arnaout for the purpose of executing the scheme to defraud, knowingly caused to be transmitted by means of wire communication, certain signs, signals and sounds, in interstate commerce, namely an electronic transmission of funds in the amount of approximately \$10,000 from BIF's checking account at LaSalle National Bank to Fleet Bank in Newark, New Jersey; in violation of Title 18, United States Code, Sections 1343 and 2.

228. Co-conspirators, aiders and abettors of the Benevolence International Foundation (a/k/a al-Birr al-Dawalia), include Defendants: Benevolence International Foundation – U.S.A. (Main Office), Benevolence International Foundation – U.S.A. (East Coast Office), Benevolence International Foundation – Canada, Syed Suleman Ahmer, Enaam Mahmoud Arnaout (a/k/a Abdel del Samia, a/k/a Abu Mahmoud), Mazin M.H. Bahareth, Shahir Abdulraoof Batterjee, Adel Baterjee, Zahir H. Kazmi, Muzaffar Khan, Soliman J. Khudeira, and Jamal Nyrabeh, all located, doing business or registered to do business in the United States.

World Assembly of Muslim Youth

229. The World Assembly of Muslim Youth (or "WAMY") and the Benevolence International Foundation (BIF) are tightly connected organizations that share the same leadership and work together on a number of joint projects. Adel Abdul Jalil Batterjee was the Secretary General of WAMY at the time he founded the al Qaeda front organization BIF in the United

States. Outside of Batterjee's role, the two organizations WAMY and BIF have also cooperated in joint-publishing of literature and film that bears both of their logos.

230. Batterjee commissioned the writing of a biography specifically about Osama bin Laden and the origins of the al Qaeda network in Arabic. This biography, *The Arab Volunteers in Afghanistan*, was jointly published in 1991 by the Benevolence International Foundation and the World Assembly of Muslim Youth. The book details Osama bin Laden's life, including the creation of bin Laden's terrorist network, al Qaeda. On the back cover is a written statement that expresses the ideology of the book, "This is the jihad in Afghanistan. What we see now, it is a blessed river. The Arab people are the people that feed the jihad river." *Arab volunteers in Afghanistan*.

231. The conspirators of the first World Trade Center bombing in February 1993 had in their possession several terrorist training manuals when they were caught. Ahmad Ajaj had in his possession an al Qaeda manual that detailed how to be an effective terrorist, teaching proper ways to make bombs and remain covert. It was found in an envelope that had both the WAMY and Lajnat al-Birr logos on it. Ajaj has been convicted for participating in the first World Trade Center attack.

232. Khalid al-Fawwaz, a senior al Qaeda leader currently imprisoned in The United Kingdom, had the same manual as Ajaj except for updates that included more recent al Qaeda knowledge. Al-Fawwaz ran Osama bin Laden's public relations organization the Advice and Reformation Committee in London and masterminded the 1998 United States Embassy bombings, for which he was indicted by the United States government. That someone of al-Fawwaz' stature in al Qaeda possessed manuals that were distributed by WAMY is indicative of the shared ideology and cooperation between WAMY and al Qaeda.

233. Another manual found in Ahmed Ajaj's possession was hate literature against Americans, Christians, and Jews. This encyclopedia, which glorified the hijacking of busses and the killing of innocent civilians in Israel, was published by WAMY.

International Islamic Relief Organization

234. The International Islamic Relief Organization (or "IIRO") has materially supported terror around the globe, including Osama Bin Laden and al Qaeda. IIRO's office in the Philippines is headed by Osama bin Laden's brother-in-law, Defendant Mohammed Jamal Khalifa and has acted as a center of terrorist financing and training activity – across the globe. IIRO then evolved into a vast independent terrorist machine – funding, recruiting and aiding and abetting al Qaeda members around the globe. IIRO was involved with the 1993 World Trade Center bombing, the plot to destroy the Lincoln Tunnel and the Brooklyn Bridge, the plot to assassinate former President William Jefferson Clinton and Pope John Paul II, the plot to blow up twelve American airplanes simultaneously, and the 1998 Embassy bombings in East Africa.

235. The IIRO sister company, International Relief Organization (or "IRO"), sends money back and forth with IIRO. IRO sends money to other organizations that sponsor terror. Another IIRO sister company, the Success Foundation, sends money back and forth with the IIRO and IRO. The Success Foundation also sends money to other organizations who sponsor terror.

236. Several employees of the Muslim World League, IIRO's parent organization, have explicitly worked with al Qaeda. Osama bin Laden's associates from Afghanistan infiltrated and propagated Muslim World League Offices around the world. The Rabita Trust, another branch of the Muslim World League, had its assets frozen as a Specially Designated Global Terrorist Entity (or "SDGT") of the United States Treasury. Wa'el Jalaidan, as Secretary General of the Rabita Trust and Muslim World League Office in Peshawar, Pakistan has

repeatedly aided and abetted terrorists. Jalaidan has been branded a SDGT by the United States Treasury Department and his assets have been frozen. The Treasury Department described Jalaidan as follows at his designation as a terrorist entity:

Usama bin Laden and a top al-Qa'ida lieutenant, Abu Zubaida, have acknowledged Wa'el Julaidan as a known associate of their operations. Julaidan has been the head of various non-governmental organizations providing financial and logistical support to the al-Qa'ida network.

237. Abdurahman Alamoudi, the Secretary of the Success Foundation, has openly stated his support for HAMAS and Hizbollah, both designated terrorist organizations. Alamoudi is the President of the American Muslim Foundation (or "AMF"), which receives thousands of dollars from the Success Foundation, as stated on the income tax Form 990s for the Success Foundation. Mohammed Omeish, President of the United States branches of IIRO and IRO, as well as their sister organization the United States-based Success Foundation, is also Vice-President of the American Muslim Foundation.

238. Adnan Basha, IIRO's Secretary-General, wrote "The major finance is coming from the generous people of Saudi Arabia, King Fahd, and the royal family." Arafat El-Ashi, head of IIRO's Canada branch, testified in the trial of Mahmoud Jaballah that IIRO and MWL were intimately connected to and funded by certain Saudi Arabian interests. Arafat el-Ashi stated in his testimony in the Jaballah trial that as a IIRO and MWL employee, he considered himself an employee of the Saudi government.

239. According to the account of Mohammed Bayazid, al Qaeda member and associate of Osama bin Laden, the Muslim World League opened an office in Pakistan for the use of the founders of al Qaeda. The Muslim World League initially was funded by Osama bin Laden, then the government of Saudi Arabia took over the funding. According to the Arabic periodical

publication *Rose Al-Yusuf*, the IIRO is firmly entrenched with Osama bin Laden's al Qaeda organization. As one example, the IIRO supported an al Qaeda guest house in Egypt.

240. The perpetrators of the first attack on the World Trade Center in 1993 were given al Qaeda funding and support through Defendants Mohamad Khalifa and IIRO. Mohamad Khalifa, as the head of IIRO, used the organization to collect and launder money for al Qaeda operations. IIRO funded the terrorist al Qaeda groups Moro Islamic Liberation Front (or "MILF") and the Abu Sayef Group (or "ASG"). A former Abu Sayyaf member stated: "Less than 30% of the IIRO funds went to legitimate public works, the rest going toward the purchase of weapons." Mohamad Khalifa's branch of the IIRO served as a base to plan and finance al Qaeda and international terrorism.

241. IIRO built its office in Khartoum, Sudan in the same residential neighborhood as Osama bin Laden's personal office, according to the testimony of a former al Qaeda member, Jamal Ahmed Mohammed Al-Fadl. IIRO also built its Khartoum office near the office of Benevolence International Foundation, another al Qaeda front, and in the same residential neighborhood where Osama bin Laden had his personal office.

242. The IIRO was implicated in the bombing of the United States Embassies in Kenya and Tanzania in 1998. Kenya deregistered the IIRO after the bombing. IIRO Tanzania was reportedly working with al Qaeda immediately before the United States Embassy bombing. IIRO went on to plot to destroy United States Consulates in India in 1999.

243. According to Canadian intelligence documents, IIRO funded al-Jihad. Mohmous Jaballah, an Islamic al-Jihad member tried in Canada, was an IIRO employee. Egyptian al-Jihad, led by al Qaeda's second-in-command, Ayman al-Zawahiri, is a branch of al Qaeda. As an

employee of IIRO Canada, Mohammed Khatib founded the Canadian branch of Benevolence International Foundation.

244. IIRO works with numerous other al Qaeda affiliated charities. IIRO shares the same address in The United Kingdom as the International Development Foundation (or “IDF”), a charity affiliated with Defendant Khalid bin Mafouz, a senior al Qaeda financier. The Success Foundation, IIRO’s namesake, is also funded by Khalid bin Mafouz. IIRO aids and abets the Saudi Joint Relief Committee, an al Qaeda charity in Bosnia and elsewhere. IIRO, through Khalifa, sponsors, aids and abets Benevolence International Foundation, the al Qaeda charity front. IIRO provides funding for other alleged humanitarian organizations that have materially sponsored, aided and abetted and conspired with al Qaeda: Global Relief Foundation (or “GRF”), Taibah International, Islamic African Relief Agency, World Assembly of Muslim Youth, (or “WAMY”).

245. Mohammed Omeish is Vice President of American Muslim Foundation which according to its tax Form 990, filed in 1999, gave money to Tarik Hamdi. Tarik Hamdi helped Osama bin Laden get a satellite phone and other electronic equipment which was used to coordinate acts of international terrorism.

246. After September 11, 2001, IIRO’s offices in Virginia were raided by the FBI as a result of al Qaeda sponsorship. One of the September 11, 2001, hijackers claimed to be going to work for IIRO’s Fazez Ahed. IIRO also extensively funded the Taliban regime. As stated by Dr. Adan Basha, Secretary-General of IIRO, the IIRO donated more than Sixty Million (\$60,000,000) dollars to the Taliban Regime. The Taliban Regime was a known material sponsor, aider and abettor of al Qaeda terrorists. After September 11, 2001, Pakistan deported

89 Arab aid workers from the IIRO and other organizations because they were aiding, abetting, funding, otherwise conspiring with, sponsoring and/or supporting al Qaeda.

247. Sanabil al-Khair was created to manage the International Islamic Relief Organization's financial assets. IIRO's website states, "It [IIRO] has established an endowment fund (Sanabil Al-Khair) which will be used to generate a stable income to finance its various activities." The Sanabil al-Khair has incorporated in the United States under two different names: The Sana-Bell, Inc. and Sanabel al-Kheer, Inc. Their corporate records indicate the same address as IIRO in Herndon, Virginia.

248. Additional co-conspirators, material sponsors and/or aiders and abettors and members of the terrorist enterprise of the International Islamic Relief Organization include Defendants: Success Foundation, Inc., Mohamed S. Omeish, Abdurahman Alamoudi, Khaled Nouri, Sulaiman al-Ali, Abdullah M. al-Mahdi, Tareq M. al-Swaidan, Abdul al-Moslah, Salah Badahdh, Abdullah bin Saleh al Obaid, Hassan A.A. Bahfzallah, and M. Yaqub Mirza, all located, doing business or registered to do business in the United States.

The Muslim World League

249. The Muslim World League was founded in 1962 in Saudi Arabia, to "disseminate Islamic Dawah and expound the teachings of Islam." The Muslim World League (or "MWL") is the parent organization of the charity IIRO. MWL uses the IIRO as an operational arm to perform many of its charitable activities.

250. The Muslim World League is an organization funded, supported, and financed by persons or entities of Saudi Arabia. According to the testimony of Arafat al-Asahi, a MWL representative in Canada:

Q. During those eight years that you have been with the IIRO here in Canada, have you ever heard anything to the effect that the Canadian government has any concern whatsoever with respect to your office?

- A. Let me tell you one thing. The Muslim World League, which is the mother of IIRO, is a fully government funded organization. In other words, I work for the Government of Saudi Arabia. I am an employee of that government. Second, the IIRO is the relief branch of that organization which means that we are controlled in all our activities and plans by the Government of Saudi Arabia. Keep that in mind, please.
- Q. I will. Thank you. When you say you work for the Government of Saudi Arabia, are you also paid by that government?
- A. I am paid by my organization which is funded by the government. Let me tell you one little thing. Whenever the Saudi Embassy in Ottawa required anything, to ask about any Muslim project all over Canada, they come to us. They ask us about the people who are doing this project. Do you get this point?
- Q. Yes.
- A. Whatever we say is acceptable, fully acceptable, by the Saudi Embassy and by the government of Saudi Arabia.
- Q. Is the Muslim World League the type or organization that would actually have physical offices in countries throughout the world?
- A. Of course. I said in the beginning that we have over 30 offices all over the world? One is here; one is in Washington, D.C. They are spread all over, in Europe, in Asia.
- Q. When you speak of an office that is an IIRO office, that counts as a Muslim World League office as well?
- A. What happens is that sometimes the IIRO and the Muslim World League office is one, but sometimes they have two different offices, although the umbrella organization is the same, which is the Muslim World League.

251. The Muslim World League has at least two offices in the United States. The New York City office is currently active, while its main office in Herndon, Virginia, was the target of federal raids in early March 2002. Its officers at the Virginia office are President Abdullah bin Saleh al-Obaid, Vice President Hassan A. A. Bahafzallah, and Secretary/Treasurer Yaqub M. Mirza.

252. Abdullah al-Obaid, President of the United States branch of MWL, and former Secretary-General of the organization, also runs one of the al-Rajhi family's largest corporations, al-Watania. The al-Rajhi family is the primary funder of the entire SAAR Foundation Network. Adullah al-Obaid also served as Secretary-General of the Rabita Trust.

253. Yaqub Mirza, the secretary and treasurer of the MWL in the United States, is the financial mastermind of the SAAR Network. Yaqub Mirza's house was raided in March, 2002 by federal authorities investigating his alleged connections to al Qaeda and September 11, 2001.

254. The Muslim World League has numerous connections with al Qaeda operatives. Mohammed Bayazid, an al Qaeda operative who fought alongside Osama bin Laden and the other mujahideen in Afghanistan (and has been implicated in a plot to get nuclear materials for al Qaeda), described how Defendant Mohammed Jamal Khalifa, Osama bin Laden's brother-in-law, opened a Muslim World League office in Pakistan for the use of the founders of al Qaeda:

Brother Jamal Khalifa (Abu-l-Bara) was the one who started the educational project, both in the interior of Afghanistan and abroad. Thanks to Dr. Abdullah Azzam's efforts he succeeded in getting the approval of the Muslim World League to open an office for the League in Peshawar as an umbrella under which the brothers could work and move in Pakistan freely.

255. Wa'el Jalaidan, whom the United States Treasury Department named as "one of the founders of al Qaeda," headed the Muslim World League in Peshawar, Pakistan and also served as the Secretary-General of the Rabita Trust. Jalaidan has been branded a Specially Designated Global Terrorist Entity (or "SDGT") by the United States Treasury Department and his assets have been frozen. The Treasury Department also characterized Jalaidan as having "directed organizations that have provided financial and logistical support to al-Qa'ida." Wa'el Jalaidan operated Muslim World League offices around the world. These offices served in the early days of al Qaeda to attract and train holy warriors for the war in Afghanistan.

256. Wadih el-Hage, convicted for his role in the 1998 United States Embassy bombings in Africa, stated at his trial that he worked at the Muslim World League in Peshawar, Pakistan in the 1980s. It was while working at the Muslim World League that el-Hage met Abdullah Azzam, the mentor of Osama bin Laden, and a co-founder of al Qaeda.

257. Ihab Ali, another al Qaeda operative in prison in the United States on perjury charges, also went to work for the Muslim World League in 1987. Ihab Ali played a large role in the embassy bombings, facilitating communication between Osama bin Laden and other al Qaeda members and also piloting Osama bin Laden's personal jet. In 1993, Ihab Ali took flight lessons at the Airman Flight School in Norman, Oklahoma—the same school Zacarias Moussaoui attended and which Mohammed Atta scouted as a possibility for his flight training.

258. According to the grand jury, Ihab Ali did not disclose the extent to which his pilot training and international travels concerned efforts to assist in al Qaeda's terrorist activities.

259. In conjunction with the attempted assassination of Egyptian President Hasni Mubarak in 1995, one of the would-be assassins admitted: "The Muslim World League bought our travel tickets and gave us spending money before we arrived at the [Osama bin Laden's] farm in Suba region in southern Sudan."

260. Co-conspirators, aiders and abettors of the Muslim World League (a/k/a Rabita al-Alam al-Islami, a/k/a Islamic World League), include Defendants: Muslim World League, Abdullah bin Saleh al-Obaid, Hassan A.A. Bahafzallah, and Yaqub M. Mirza, all located, doing business or registered to do business in the United States.

The SAAR Foundation

261. The SAAR Foundation was named after Sulaiman Abdul Aziz al-Rajhi, head of the Saudi Arabian al-Rajhi family, and was formed in the 1970s by a group of Muslim scholars and scientists from the Middle East and Asia. SAAR was incorporated in Herndon, Virginia as a 501c(3) non-profit organization on July 29, 1983, and dissolved as of December 28, 2000. The Saudi Arabian al-Rajhi family is the foundation's biggest donor. The SAAR Network financially supports terrorism and its main contributors, the al-Rajhi Family, has a long history of same.

262. Virginia Secretary of State Corporate Records indicate that there are more than one hundred affiliated organizations registered or doing business at just one of SAAR's addresses in Herndon, Virginia. Most of these organizations do not maintain a physical presence at that address, or elsewhere. The SAAR Foundation and network is a sophisticated arrangement of non-profit and for-profit organizations that serve as front-groups for extremist Islamic terrorist organizations.

263. On March 20th and 21st, 2002, the offices of many SAAR Network organizations, along with the residences of their top executives, were raided by the joint terrorism task-force, Operation Greenquest. Operation Greenquest was created after September 11, 2001, by the United States Treasury Department as a new multi-agency financial enforcement initiative bringing the full scope of the government's financial expertise to bear against sources of terrorist funding. According to the search warrants issued at nearly twenty locations, the SAAR Network was raided for "potential money laundering and tax evasion activities and their ties to terrorist groups such as . . . al Qaeda as well as individual terrorists . . . (including) Osama bin Laden."

264. The SAAR Foundation reported revenues of over \$1.7 billion for the year 1998, which represents more than any other United States charity has ever generated. The SAAR Foundation and its affiliated charities keep a low profile in that they do not conduct fundraising events or publicly reach out to potential donors like most charities.

265. On November 7, 2001, Bank al-Taqwa was first designated by President George W. Bush's Executive Order as a Specially Designated Global Terrorist Entity and the United States Department of Treasury and its assets were frozen. Two SAAR Network executives, Samir Salah and Ibrahim Hassabella, were both former executives at Bank al-Taqwa. Two other executives in the SAAR Network, Jamal Barzinji and Hisham al-Talib, worked for Youssef M.

Nada, the head of Bank al-Taqwa who also had his assets frozen. The SAAR Network links with Youssef Nada include that Sulaiman al-Rajhi was on the Board of Directors at Youssef Nada's Akida Bank in the Bahamas. People associated with the SAAR Foundation and its network were also implicated in the United States Embassy terrorist bombings in Kenya and Tanzania.

266. The SAAR Network and the more than one-hundred businesses and individuals that comprise it are fronts for the sponsor of al Qaeda and international terror. These organizations are closely inter-twined with Defendants IIRO, Muslim World League and their related "charities." The connections between the al-Rajhi family, the SAAR Network, and the terrorist front-groups extends past the financial network to a repetitious pattern of overlapping officers. The United States branches of the Muslim World League and its subsidiaries are a part of the SAAR Network. The Muslim World League and SAAR share officers and addresses. They are analogous to the SAAR Network in that they play an intermediary role between wealthy Saudi financiers and terrorist groups.

267. Co-conspirators, material sponsors, and/or aiders and abettors of the SAAR Network include Defendants: Abu Sulayman, Ahmed Totonji, Hisham al-Talib, Iqbal Yunus, Jamal Barzinji, M. Omar Ashraf, Mohammed Jaghli, Muhammad Ashraf, Taha Jaber al-Alwani, Tarik Hamdi, Yaqub Mirza, Sherif Sedky, African Muslim Agency, Aradi, Inc., Grove Corporate, Inc., Heritage Education Trust, International Institute of Islamic Thought, Mar-Jac Investments, Inc., Mar-Jac Poultry, Inc., Mena Corporation, Reston Investments, Inc., SAAR International, Safa Trust, Sterling Charitable Gift Fund, Sterling Management Group, Inc., and York Foundation, all located doing business or registered to do business in the United States.

Rabita Trust

268. Rabita Trust is a charitable organization which was created to organize the repatriation and rehabilitation of stranded Pakistanis (Biharis) from Bangladesh. Founded in 1988, the trust fund was started jointly by the government of Pakistan and the Saudi-based charity, the Muslim World League (Rabita al-Alam-e-Islami). Rabita Trust received the majority of its funding from the Muslim World League, a world-wide Islamic organization heavily funded by the Saudis, but which has also been involved with terrorism.

269. Rabita Trust was initially granted 250 million Riyals from the Pakistani government as well as 50 million Riyals from the Muslim World League to help relocate some 250,000 displaced Pakistani refugees in Bangladesh. In its 15 years of existence, the Rabita Trust has only managed to relocate a few hundred Biharis.

270. Rabita Trust is an al Qaeda front, and the Head of Rabita Trust is a known al Qaeda member. A Treasury Department press release issued when Rabita Trust's assets were frozen indicated that:

Rabita Trust is headed by Wa'el Hamza Jalaidan, one of the founders of al-Qaida with bin Laden. He is the logistics chief of bin Laden's organization and fought on bin Laden's side in Afghanistan.

271. According to an authoritative biography of bin Laden and the original members of al Qaeda, the head of Rabita Trust, Wa'el Jalaidan, fought alongside Osama bin Laden and championed his cause. Detailing how al Qaeda's key founders fought against the Soviets in Afghanistan during the Soviet-Afghan war of the 1980s, this account is noted for its accuracy and clarity. The biography, written by a fellow compatriot of bin Laden, noted:

One of the men who led the Arab Afghan Jihad forces came from one of the wealthiest Saudi families; he was influenced by the Afghan struggle, who would live together with them and sacrifice everything for the Afghani jihad. This man was Osama bin Laden, a young, tall man who

followed Dr. Abdullah Azzam to fight in Afghanistan. Another Saudi joined together with them; his name was Wa'el Jalaidan, a US student who was studying agriculture and left to fight jihad in Afghanistan.

These three: Osama bin Laden (a.k.a. 'Abu Abdallah'), Dr. Abdullah Azzam (a.k.a. Abu Muhammed), and Wa'el Jalaidan (a.k.a. Abu Al-Hassen al-Madani), gathered together in December 1979 to create the new Islamic revolution in Afghanistan.

Accordingly, Jalaidan was branded a Specially Designated Global Terrorist Entity by the United States Treasury Department and his assets have been frozen.

272. Rabita Trust is the sister organization of the International Islamic Relief Organization as they are both subsidiaries of the Muslim World League.

273. Rabita Trust, a subsidiary of the Muslim World League, is connected to the SAAR Network, through two officers, Dr. Abdullah Omar Naseef and Abdullah al-Obaid. The SAAR Network was the focus of March 2002 raids led by United States authorities for the network's ties to al Qaeda.

274. On October 12, 2001, President George W. Bush's Executive Order designated Defendant Rabita Trust as a Specially Designated Global Terrorist Entity and the Treasury Department froze its assets. Defendant Abdullah Omar Naseef founded the Defendant Rabita Trust in July 1988 and is currently its chairman.

275. Abdullah Omar Naseef (or "Naseef") also served as Secretary-General of the Muslim World League during the time he created Defendant Rabita Trust and has attempted to spread Muslim World League offices around the world. Part of his global efforts are found in his involvement in a SAAR Network charity. Naseef is an officer of Makkah al-Mukarramah, Inc., registered in Virginia as a non-profit organization. A second shared executive is the Vice-Chairman of the Board of Trustees of Rabita Trust, Abdullah al-Obaid, who is also an officer at two of the SAAR Network businesses that were raided, the Muslim World League and Sanabel

al-Kheer. Defendant Abdullah Omar al-Obaid is unique in that, not only is he an officer at the Muslim World League and the SAAR Network, but he is also the Deputy General Manager at one of the al-Rajhi's largest businesses, al-Watania Poultry in Saudi Arabia. Al-Watania Poultry has branches worldwide and in the United States.

The Global Relief Foundation

276. The Global Relief Foundation (or "GRF") was incorporated in January 1992 in Illinois. According to its website, GRF "is a non-profit humanitarian organization working to provide care, support and relief to people in need throughout the world."

277. GRF is active all over the world, providing relief for several countries, including the United States, Afghanistan, Kosovo, Lebanon, Bosnia, Kashmir, Turkey, and Chechnya, among others. GRF has branches of its organization, aside from Bridgeview, Illinois, located in Belgium, Yugoslavia, and Serbia.

278. In 2000, GRF's name appeared on a list being circulated by the government of charities allegedly funding terrorism. On December 14, 2001, federal authorities raided the offices of the Global Relief Foundation as well as the residences of several of its directors. Simultaneously, the United States Treasury froze GRF's assets. A spokesman for the Treasury Department noted that GRF is aiding terrorism:

There was coordinated action to block the assets, because this group is suspected of funding terrorist activities.

279. The Treasury spokesman added that the public's safety was at risk if GRF were allowed to continue to operate:

This extraordinary action was taken because it's relevant to the health and safety of the American public.

280. On the same day as the raids in the United States, the NATO-led taskforce named the Kosovo Force (KFOR) stormed two GRF offices in Yugoslavia and Serbia. A statement from KFOR explaining the raids detailed why:

This afternoon KFOR soldiers, working in close cooperation with UNMIK-Police, carried out a coordinated search operation on the offices of the Global Relief Foundation in Pristine / Pristina and Dakovice / Dakovica, after receiving credible intelligence information that individuals working for this organization may have been directly involved in supporting worldwide international terrorist activities.

281. This action was an orchestrated element of a worldwide operation coordinated with governments and law enforcement agencies against the offices of the Global Relief Foundation and other organizations suspected of supporting international terrorists.

282. GRF by and through its agents has engaged in the planning of attacks against the United States:

The Global Relief Foundation is a worldwide, US based Non-Governmental Organization (NGO), which has headquarters in Chicago, Illinois, USA and a European Headquarters in Brussels, Belgium. It is suspected of supporting worldwide terrorist activities and is allegedly involved in planning attacks against targets in the USA and Europe.

283. The head of the Global Relief Foundation branch in Belgium received over \$200,000 from Muhammed Galeb Kalaje Zouaydi (a/k/a Abu Talha) (or "Zouaydi"), a high level al Qaeda financier. Zouaydi, who was arrested by Spanish authorities on April 23, 2002, is a brother-in-law of Osama bin Laden. A top financier for al Qaeda, he also served as one of the original terrorists who fought with Osama bin Laden and the other original founders of al Qaeda.

284. On October 12, 2001, the United States Treasury froze the assets of Jam'yah Ta'awun Al-Islamia (Society of Islamic Cooperation) and branded it a Specially Designated Terrorist Entity. According to the Treasury, the Society of Islamic Cooperation is headed by

Zouyadi, who is also an explosives expert. Based in Qandahar City, United States Treasury department officials allege that the organization was founded by Osama bin Laden in early 2001.

285. Zouyadi was in close connection with the al Qaeda cell in Germany that participated in the September 11, 2001 attacks. Zouyadi also sent money to Mamoun Darkazanli, who had his assets frozen and was designated a terrorist entity by the United States government shortly after September 11, 2001, and is suspected of being a key al Qaeda pointman in Europe, as is described in more detail *infra*.

286. GRF's offices have also been raided in the Yugoslavia and Serbia as part of international investigations into GRF's support of terrorism. On at least one occasion, Zouaydi transferred 231,664 euros to the head of GRF's Belgium arm, Nabil Sayadi, who is also linked to Osama bin Laden.

287. Documents provided by the United States government in defense of its freezing of GRF's assets indicate that known al Qaeda's terrorist Wadih el-Hage was in direct contact with GRF officials while he was planning international terrorism attacks. Specifically, the government noted in its supporting documents that the FBI reported that evidence introduced at el-Hage's trial demonstrated that, in the late 1990s, GRF maintained communications with Wadih el-Hage.

288. Furthermore, the government indicated:

At the time, el Hage was in contact with GRF, he resided in Kenya, and played an "active role" in an al Qaeda terrorist cell operating there...

289. During this same period, 1996 and 1997, el-Hage was also in contact with GRF offices in Belgium and Bridgeview, Illinois. In particular, documents recovered in a search in Kenya showed that el-Hage was in contact with GRF in Bridgeview, Illinois after returning from a visit with al Qaeda leadership in Afghanistan in February 1997.

290. Evidence provided by the government in freezing GRF's assets corroborates GRF's promotion of martyrdom to kill the "enemies of Islam." The government assessed:

Newsletters distributed by GRF and published in 1995 by the Central Information News Agency Network (CINAN), which, like GRF, is operated via a Bridgeview post office box, encourage "martyrdom through JIHAD." The newsletters, written in Arabic and translated by the FBI, include an article soliciting funds for the Bosnian relief effort to assist those suffering from the prolonged agony due to atrocities imposed by the "enemies of Islam." The article refers to the Jihad (struggle) that should be carried out by Muslims and states: "It seems that the Prophet (Mohammad) had linked religion with JIHAD. So when do we awake? When can we take revenge for God and his religion? When can we rise to defend our rights and self respect?" The article continued, "God had equated martyrdom through JIHAD with supplying funds for the JIHAD effort," and concluded, "All contributions should be mailed to: GRF." (emphasis added)

291. GRF newsletters implored individuals to donate money to their organization for the purposes of buying weapons. The government explained:

Other GRF newsletters and publications encourage readers to give their Zakat, or charitable tithe, to GRF to assist in the purchase of, *inter alia*, weaponry. "[F]or God's cause (the Jihad, they [the Zakat Funds] are disbursed for equipping the readers for the purchase of ammunition and food, and for their [the Mujahideen's] transportation so that they can raise God the Almighty's word and protect the gaps...." The article concluded by exhorting Muslims "to make the Global Relief Foundation your messenger of goodness, and we will, God willing, disburse it as specified in Bosnia, Kashmir, Afghanistan, Tajikistan, and Lebanon."

292. Since GRF's assets were blocked, information gathered about GRF, according to the government, has only reaffirmed that GRF works closely with and in support of terrorist organizations:

In addition to this unclassified evidence, the classified material gathered since the date of the blocking has greatly amplified OFAC's [Office of Foreign Asset Control] belief that GRF may have acted in concert with, and in support of, terrorists and terrorist entities.

293. Several photographs obtained at GRF's offices in Chicago indicate that GRF used its humanitarian cover as means to send expensive communications equipment abroad. The government described what exactly was found during the raids on GRF's offices:

A set of photographs and negatives discovered at GRF's Chicago offices indicate types of "humanitarian" supplies that GRF has sent abroad. The photographs display large shipping boxes arrayed under a GRF banner. Other photographs reveal that the boxes contain sophisticated communications equipment: approximately 200 handheld radio transceivers, long range radio antennas, and portable power packs, with an estimated total value of \$120,000. Arrayed near the communications equipment are a tool kit, a box of Bushnell binoculars, saddles, and ropes.

294. Other photographs found in the raids indicate that GRF had an specific interest in munitions:

Other photographs in this same set depict fighters armed with automatic rifles, a sand-bagged bunker with a radio mounted outside, and mutilated corpses with the name "KPI" (Kashmiri Press International) printed alongside. Finally, one photograph displays two dead men with the caption "HIZBUL MUJAHIDEEN," a known terrorist organization operating in the Kashmir region between India and Pakistan. On the reverse side of the photograph was handwritten in Arabic, "two martyrs killed by the Indian government."

295. Mohammed Chehade, Rabih Haddad, Hazem Ragab, and Mohammed Alchurbaji are aiders, abettors, agents, sponsors and/or co-conspirators of the Global Relief Foundation.

Taibah International Aid Association

296. Taibah International Aid Association (or "Taibah") is a charitable organization headquartered in Falls Church, Virginia. Established in 1991, Taibah's IRS Form 1023, which serves as an application to the United States Government for tax exempt status, lists Abdullah A. bin Laden, Osama bin Laden's half-brother, as a founding officer. The same form also lists Taibah's stated goals as a humanitarian organization:

The Taibah International Aid Association's first and most important activity is to act as a missionary in the United States to promote the Muslim faith and provide a better understanding of the Muslim faith.

The second most important activity is to give monetary aid and contribute goods and services to people of the Muslim faith, and other people in need throughout the world.

The third most important activity is to raise money and contribute money to other charitable organizations which qualify as exempt organizations which will provide for the education, enhancement and betterment of all Muslim believers' lives.

297. From its headquarters in the United States, Taibah has a presence around the world through offices, mosques, and educational centers in the following countries: Albania, Bosnia-Herzegovina (BiH), Bulgaria, Gargizia, Kazakhstan, Kosovo, Ozpakistan, Russia, Shofishia, Tajikistan and Tataristan, among others.

298. Despite a well developed website, Taibah does not solicit funding through this channel. According to its IRS Form 1023, Taibah relies on fundraising trips to the Middle East and mailings sent to Muslims in the United States for its revenue. As a result, roughly half of the United States arm of Taibah International's revenue comes from Saudi Arabia. On its year 2000 IRS Form 990, Taibah lists a four year aggregate contribution of nearly \$150,000 dollars in fund raising from Saudi Arabia. Also, Taibah's Bosnian branch relies on Saudi Arabia for funding. The Saudi Arabian Saudi High Commission has been identified by Bosnian intelligence as a source of Taibah's funds.

299. Although it purports to be a humanitarian organization, the Taibah International Aid Association furthers the aims and materially supports Osama bin Laden and al Qaeda. Through the actions of its agents, officers and employees, Taibah has provided financial and material support to al Qaeda. The strong affiliation that Taibah maintains with many other al Qaeda front-groups demonstrates its place as a highly connected component of Osama bin Laden's financial and logistical support network.

300. Taibah's support of international terrorism and al Qaeda is ongoing. On October 21, 2001, five Algerians were arrested in Bosnia-Herzegovina on criminal charges of international terrorism following a threat to the United States Embassy in Bosnia. The incident resulted in the five day closure of the United States and British Embassies for what both embassies called a credible security threat. The plot was discovered when United States intelligence intercepted a telephone conversation between two of the accomplices about the mission. During this telephone conversation, one of the terrorists said, "American interests would be jeopardized within 48 hours." One of the individuals involved was Mustafa al-Kadir, who was granted Bosnian citizenship based on his employment with Taibah International. Al-Kadir was still working with Taibah at the time of this foiled terrorist attack and ensuing arrests.

301. The NATO Secretary-General, George Robertson, stated that at least one of the five arrested Algerians had direct links with al Qaeda and Osama bin Laden. The leader of the group, Bensayah Belkacem, has been identified as a top al Qaeda lieutenant. In October 2001, Belkacem was arrested at his apartment in Zenica, Bosnia where authorities found phony passports and a mobile telephone listing for Abu Zubeida, al Qaeda's third-in-command. According to phone transcripts, Belkacem was also in phone contact with al Qaeda military commander Abu al-Maid.

302. On December 13, 2001, Bosnian police searched the offices of Taibah International. Following the raid, an audit and investigation of Taibah's financial records was conducted on January 25, 2002. This audit reveals that Taibah's financial records were managed in a way that that obscured its true financial status. The financial records contained flagrant abuses in Taibah's allocation of donations and in the manner its expense accounts were maintained. A March, 2002, Bosnian Intelligence Memo from the Agency for Investigation &

Documentation (AID) that summarizes the audit described the illegal management of Taibah's funds by its executives:

It is also noteworthy that large cash sums were withdrawn by management individuals at the organization which were never accounted for by any record of expenditure, and which indicates a wide scope for possible illegal spending of money. It is clear that each of these items is for more than 10 thousand marks.

303. Other discrepancies noted in the audit were the misuse of automobiles, supplying of fictitious declarations of affiliation and employment, as well as suspicious requests for visas.

304. Funding for the Bosnian office of Taibah originates from bank accounts at the al-Rajhi Islamic Bank. The flow of money begins with the al-Rajhi Islamic Bank in Saudi Arabia, then to Taibah via wire transfers through Hypobank in Germany and Commerce Bank in Bosnia. The al-Rajhi Islamic Bank, its agents, officers, directors, and so-called charities, members of the al-Rajhi family are significant financial supporters of terrorism as is discussed *supra*.

305. In Bosnia, Taibah International works closely with another al Qaeda front-group, the charitable organization and Defendant Global Relief Foundation (or "GRF"). According to the 2002 Bosnian Intelligence Memo, when GRF was initially registered, it operated in Bosnia under the auspices of Taibah International. Taibah's close working relationship with GRF is in accord with both charities' role as al Qaeda sponsors and front groups.

306. The 2002 Bosnian Intelligence Report on non-profit organizations affirms that Taibah's Bosnian office received its revenues from another Saudi Arabian charity, the Saudi Relief Commission (a/k/a Saudi High Relief Commission) (or "SRC"). Taibah has been implicated in the 1998 United States embassy bombings along with the SRC.

307. Two officers from Taibah International's United States branch, Samir Salah and Abdulrahman al-Amoudi (or "al-Amoudi"), play a large role with United States organizations

that have come under scrutiny for their ties to al Qaeda. Both of them are officers of a number of organizations in the SAAR Network. Abdulrahman al-Amoudi, Taibah's Vice-President, is a past employee of the SAAR Foundation, the hub of the SAAR Network, and currently heads a few SAAR Network charities. Al-Amoudi also runs the United States operations of the Saudi-based International Islamic Relief Organization. Samir Salah, Taibah's Secretary, serves as a director at many SAAR Network organizations, including CFO at Piedmont Poultry. Samir Salah also managed the Caribbean branch of the Bank al-Taqwa.

308. Taibah International Aid Associations directors, officers, including Abdullah A. bin Laden, Anwar Hajjaj, Abdulrahman al-Amoudi, Samir Salah, Saleh O. Badahdah, Sulaiman al-Alsheikh, and Abelmagne Ali Eldeen are aiders, abettors, material sponsors and/or co-conspirators of Taibah International Aid Association, al Qaeda, and international terrorism.

Saudi Binladin Group

309. The Saudi Binladin Group (or "SBG"), also known as the Binladin Corporation, is an expansive global conglomerate.

310. The Saudi Binladin Group's website details its history in the following manner:

The history of Binladin began in 1931 when Mohammed Binladin founded the company. From its humble beginnings as a general contractor, the company has grown and prospered in parallel with the growth and prosperity of the Kingdom of Saudi Arabia. Over the years the company has been entrusted with many major construction projects, projects that helped the Kingdom to develop its resources and expand its infrastructure.

311. The Saudi Binladin Group (a/k/a Saudi Binladen Group, a/k/a Binladin Corporation) (or "SBG") is based in Jeddah, Saudi Arabia. The group founded in 1931 is a privately held company wholly owned by the descendants of Mohammed Awad Bin Laden, father of Osama Bin Laden. The international conglomerate is active in the areas of construction,

engineering, real estate, distribution, telecommunications and publishing. Construction accounts for more than half of SBG's gross revenue.

312. SBG or its predecessor in interest was the first private contractor in Saudi Arabia. SBG's status as an organization makes it exempt from publishing its financial records. For several years, it was the official and exclusive contractor of the holy sites of Mecca and Medina.

313. Saudi Binladin Group is run by Bakr M bin Laden, son of Mohammed bin Laden. Family member Salem bin Laden ran the group until his accidental death in 1998. SBG's board of directors include Saleh Gazaz, Mohammed Bahareth, Abdullah bin Said, Mohammed Nur Rahimi, Tarek M. bin Laden, and Omar M. bin Laden. Until recently, the Saudi Binladin Group had an address in Rockville, Maryland.

314. Osama Bin Laden received extensive financing and material support from the SBG. He declared during an interview in 1997 that:

We transported heavy equipment from the country of the Two Holy Places (Arabia) estimated at hundreds of tons altogether that included bulldozers, loaders, dump trucks and equipment for digging trenches. When we saw the brutality of the Russians bombing Mujahidins positions, by the grace of God, we dug a good number of huge tunnels and built in them some storage places and in some others we built a hospital. We also dug some roads, by the grace of God, Praise and glory be to Him, one of which you came by to us tonight.

315. Osama Bin Laden used SBG support and assistance to build necessary infrastructure in Afghanistan as he did in Sudan. In the introduction of his Declaration of War against the Americans in 1996, Osama Bin Laden admitted this family support:

Then in 1979, just after he graduated from King Abdul Aziz University in Jeddah with a degree in Civil Engineering, the Soviet Union invaded Afghanistan, and the Mujahideen put out an international plea for help. Usama bin Ladin responded by packing himself and several of his family's bulldozers off to Afghanistan.

316. The Saudi Binladin Group provided material support and financing to Osama Bin Laden in Afghanistan, as reported by the United States State Department:

Under Al-Qaida auspices, Bin Laden imported Bulldozers and other heavy equipment to cut roads, tunnels, hospitals, and storage depots Afghanistan's mountainous terrain to move and shelter fighters and supplies.

His [Osama Bin Laden] father backed the Afghan struggle and helped fund it, so when Bin Laden decided to join up, his family responded enthusiastically.

317. After the Soviets withdrew from Afghanistan in 1989, Osama Bin Laden returned to work in the Saudi Binladin Group's Jeddah-based construction business. He continued to support militant Islamic Groups until his departure to Sudan 1991. After his relocation to Sudan the same year, Osama Bin Laden maintained close relationships with the Saudi Binladen Group and they remained his sponsor.

The relationships between Osama Bin Laden and his family continued, despite claims to the contrary. Dr. Saad Al Fagih, Saudi dissident living in London, and former Afghan combatant, who kept close relationship with Osama bin Laden for many years, stated in 1994: There's a very interesting thing in Islamic structure of the family: you are obliged to support your family members. Even if they are distant members. If it's a cousin or a niece or a nephew, especially a brother, you have to support them if you are a capable person. And the people feel sinful if they don't let this money go to its real owner, in this case, Osama bin Laden.

318. The notion that Osama bin Laden had been somehow "disowned" by the bin Laden's is not supported by the facts or by the realities of Islamic culture. In a 1997 interview, Osama bin Laden revealed that on nine different occasions, his mother, uncle and brothers had visited him in Khartoum in Sudan. The Saudi Binladen Group provided Osama bin Ladin financial assistance and engineering support in Sudanese construction projects. Various sources confirmed that the Sudanese construction company set up by Osama Bin Laden, Al-Hijra for

Construction and Development, was a subsidiary of the Saudi Binladen Group. This information is confirmed by an Intelligence Newsletter:

These are Wadi al Aqiq, an agricultural company with an investment arm; Al Timar Al Mubarikah, a sugar concern; Al Hijra a building and public works Company . . . an affiliate of the powerful Saudi group headed Bin Laden's father.

319. In Sudan, Osama bin Laden participated in the construction of the Tahaddi road and the Port Sudan Airport. The Saudi Binladin Group provided support and contribution to these public works through two subsidiaries. The Public Buildings and Airports Division of the Saudi Binladin Group participated in the construction of the Port Sudan Airport, and the Mohamed BinLadin Organization (of SBG) was providing technical assistance on the road construction with Sudan and Osama bin Ladin. The Saudi Binladin Group confirmed publicly these two collaborations:

Over the years the Division has undertaken various challenging projects, large and medium scale, including complete airports and roads. . . . The projects executed include . . . Port Sudan Airport.

SBG's skills . . . has been recognised and utilized in the United Arab Emirates, Jordan, Yemen and Sudan.

320. The agreement for the construction of an airport in Port Sudan was between the Sudanese Government and the Saudi Binladin International Company. In 1993, Osama bin Laden stated that he was involved in the construction of the road linking Khartoum to Port Sudan:

I am a construction engineer and an agriculturalist. If I had training camps here in Sudan, I couldn't possibly do this job (the Challenge road) [...] Yes, I helped some of my comrades to come here to Sudan after the war.

321. Relationships between the three entities: Osama bin Laden, the Republic of Sudan, and the Saudi Binladin Group were stressed during the inauguration ceremony of the Port Sudan airport:

Meanwhile, Osama Bin Laden, was the first guest invited to attend the inauguration of the new Port Sudan Airport. He sat in the front row and was the guest of honor in this ceremony. It was a group of Bin Ladin's companies that carried out the project of the new and modern airport that cost huge amounts of money.

322. Moreover, while Osama bin Laden was constructing the Tahaddi Road with Saudi Binladen Group's technical assistance, his own company, Al-Hijra, was headed by Muslim activists. Thus, the testimony of Jamal Ahmed al-Fahd during the 2001 trial of the 1998 African Embassy Bombings revealed nature of Al-Hijra executives in Sudan:

Q. Do you know who ran the Al-Hijra Company while it was in the Sudan?

A. At the time, few people. The first one Dr. Sharif al Din Ali Mukhtar.

Q. Who else?

A. Abu Hassan al Sudani, and Abu Hamman Al Saudi, Abu Rida Suri and Abu Hajer.

323. Other Al-Hijra agents, officers, or executives were directly involved in al Qaeda and terrorist operations. Mandouh Mahmud Salim, an al Qaeda co-conspirator, was on the Al-Hijra board of directors and is considered a founding member of al Qaeda.

324. The Saudi Binladin Group sheltered and directly supported operatives of the al Qaeda terrorist organization. Mohammad Jamal Khalifa is known to be a key figure in the network of Osama bin Laden and has been implicated as a central al Qaeda figure in several international terrorist plots. Yet Khalifa was taken in by a branch of Saudi Binladin Group, the Mohammed Binladin Organization, headed by Osama bin Laden's brothers. The address listed on Khalifa's visa application was the Mohammed Binladin Organization in Jeddah.

325. The Mohammed BinLadin Organization is a wholly-owned subsidiary of the Saudi BinLadin Group. The board members include Saleh Gazaz, Mohamed Bahareth, Abdullah Bin Said, Mohamed Nur Rahimi, Bakr M. bin Laden, Tarek M. bin Laden, Omar M. bin Laden, and Yeslam M. bin Laden.

326. In the early 1990s, Tarek bin Laden served as the general supervisor of the International Islamic Relief Organization (IIRO), a charity that has aided and abetted and materially supported al Qaeda and international terrorism. During this time, IIRO was rapidly becoming al Qaeda's foremost charity used as a means to transfer funds, personnel, and other means of material support.

327. According to an Arabic publication, Tarek bin Laden had a prominent role in 1990 at the IIRO:

Tarek bin Laden has been a member of the IIRO in MWL for ten years. He has been working quietly for the orphans and the immigrants in the Islamic world. In the past two years the operation of IIRO has grown thanks to the support of the Saudi Royal family. Tarek says that the IIRO relies on donations of the Saudi people and some donations from the Islamic world.

328. Yassin Abdullah al-Kadi is a United States designated terrorist and Director of Global Diamond Resources, based in Nevada. Along with Yassin al-Kadi, serving on the board of directors are representatives of the bin Laden family who invested in Global Diamond Resources. Yassin al-Kadi was introduced to Global Diamond Resource's Chairman by an executive at the Saudi bin Laden Group. In regards to the company's decision to let al-Kadi join as an investor, the Chairman said, "I relied on the representations of the bin Laden family. They vouched for him."

329. Osama bin Laden's name is still listed in the Saudi BinLaden Group's corporate records.

Yassin Abdullah al-Kadi and Muwaffaq

330. One month after the September 11, 2001 attacks, on October 12, 2001, with Executive Order 13224, President George W. Bush designated Saudi businessman Yassin al-Kadi as a terrorist entity and sponsor for financially supporting al Qaeda. As stated in a United States Department of Treasury Press Release on October 12, 2001:

Yasin al-Qadi (heads) the Saudi-based Muwafaq (or "Blessed Relief") Foundation, an al Qaeda front that transfers millions of dollars from wealthy Saudi businessmen to bin Laden.

331. Defendant Muwaffaq (or "Blessed Relief") was registered in the Channel Islands in 1992 but run from Jeddah, Saudi Arabia. The Blessed Relief charity had an international presence with offices in Europe, Ethiopia, Pakistan, Sudan, Somalia and a post office box in the United States. Blessed Relief purported to conduct traditional relief work such as the distribution of food, clothing and medical equipment to victims of war or famine. Blessed Relief was endowed by Defendant Khalid bin Mahfouz, the al Qaeda financier, and run by Yassin al-Kadi. Khalid bin Mahfouz's son, Abdulrahman bin Mahfouz, is also a director of the Blessed Relief charity.

332. Yassin al-Kadi ran Blessed Relief from 1992 until approximately 1997 with \$15 to \$20 million of his own money, along with contributions from other wealthy associates. Millions of dollars have been transferred to Osama bin Laden and al Qaeda through Blessed Relief. An audit of the Defendant National Commercial Bank of Saudi Arabia in the mid-1990s, which was then run by Khalid bin Salim bin Mahfouz, reveals the transfer of \$3 million for Osama bin Laden that was moved from the accounts of wealthy Saudi businessmen to Blessed Relief.

333. In a 1995 interview, Osama bin Laden identified Blessed Relief's place in his support network, "The bin-Laden Establishment's aid covers 13 countries . . . this aid comes in

particular from the Human Concern International Society.” Osama bin Laden went on to list a number of the Human Concern International’s branches, including the Blessed Relief Society.

334. Yassin al-Kadi incorporated the United States branch of Blessed Relief in Delaware in 1992, along with Talal M. M. Badkook and Dr. Mohaman Ali Elgari. Blessed Relief was an al Qaeda front used by wealthy Saudis and others to funnel money to Osama bin Laden’s terrorist network.

335. Yassin al-Kadi is a Director of Global Diamond Resources, based in Nevada. He sits on the board as a representative of New Diamond Holdings, a firm that has a controlling interest in Global Diamond. Along with al-Kadi on the board of directors are representatives of the bin Laden family who invested in Global Diamond Resources a year before al-Kadi. Global Diamond Resources is a diamond company that manages three mines in South Africa. Although al-Kadi invested \$3 million into Global Diamond Resources through the company New Diamond Corp., his investment had diminished to about \$750,000 as of October, 2001.

336. Three of the al Qaeda members on the FBI’s most wanted terrorist list have been discovered to have dealings in the diamond field. Following September 11, 2001, and the increased difficulty al Qaeda is facing moving its money through its traditional financial channels, al Qaeda has been converting more of its assets into diamonds. As one European investigator put it:

I now believe that to cut off al Qaeda funds and laundering activities you have to cut off the diamond pipeline. We are talking about millions and maybe tens of millions of dollars in profits and laundering.

337. Yassin Abdullah al-Kadi is the Vice President of the Saudi Arabian company M.M. Badkook Co. for Catering & Trading, owned by his partner in Blessed Relief, Talal Mohammed Badkook. Talal Badkook is also a member of the Al-Mustaqbal group along with

Saleh Mohamed bin Laden, son of Mohammed bin Laden, and Abdullah Saleh Kamel, son of Saleh Kamel and the Chairman of the Dallah al-Baraka.

338. Yassin al-Kadi is the Chairman of the National Management Consultancy Center (or “NMCC”) in Jeddah, Saudi Arabia. The NMCC lists an address in Jeddah, Saudi Arabia, which is the same address listed on Blessed Relief’s Delaware corporate records.

Certain Members of the Saudi Royal Family, and Related Persons

339. The close relationship between Osama bin Laden and certain of the highest members of the Saudi Royal family stretches back for a long period and continues to this day.

340. On August 2, 1990, the Republic of Iraq invaded Kuwait. Osama bin Laden then met with Defendant Sultan Bin Abdulaziz al Saud (or “Prince Sultan”). Prince Sultan is the Second Deputy Prime Minister, Minister of Defense and Aviation, Inspector General, and Chairman of the Board of Saudi Arabian Airlines, which does business in the United States and internationally. In the meeting, Osama bin Laden offered the engineering equipment available from his family’s construction company and suggested bolstering Saudi forces with Saudi militants who he was willing to recruit.

341. This offer was also made to Defendant Turki al Faisal al Saud (or “Prince Turki”), the then Chief of Saudi Intelligence, or Istakhbarat. Prince Turki had an ongoing relationship with Osama bin Laden from the time that they first met in Islamabad, Pakistan at the Saudi embassy, during the Soviet Union’s occupation of Afghanistan.

342. Defendant Mohammed al Faisal al Saud (or “Prince Mohammed” or Prince Mohammed al Faisal”) is involved in the financing, aiding and abetting and material support of Osama bin Laden, al Qaeda, and international terrorism in part through Faisal Islamic Bank and Al Shamal Islamic Bank. Prince Abdullah al Faisal bin Abdulaziz al Saud (or “Prince Abdullah” or “Prince Abdullah al Faisal”) and Prince Naif bin Abdulaziz al Saud (or “Prince Naif”) are also

engaged in the aiding and abetting or material sponsorship of Osama bin Laden, al Qaeda, and international terrorism as described herein. Salman bin Abdul Aziz al Saud (or “Prince Salman”) has also provided material support to Osama bin Laden, and al Qaeda. Additional members of the Saudi Royal family may be implicated and added to this action as investigations continue under the theories and facts articulated herein.

343. Prince Turki was head of Saudi Arabia’s Department of General Intelligence (Istakhbarat) from 1977 until 2001. As such, he was in a position to know the threat posed by bin Laden, al Qaeda, the Taliban, and the extremist and violent perversion of jihad and hatred that the Saudi religious schools were fomenting in young people. Prince Turki abruptly left his position in or around August 30, 2001, when he was dismissed as chief of Saudi Intelligence just prior to the September 11, 2001 attacks.

344. Prince Turki was the head of the Saudi Royal families’ intelligence service for twenty-five years. Prince Turki met personally with Osama bin Laden at least five times while in Pakistan and Afghanistan during the mid-eighties to mid-nineties. Prince Turki also had meetings with the Taliban in 1998 and 1999. On or about 1995, while the Saudi Istakhbarat was headed by Prince Turki and decided to give massive financial and material support to the Taliban. Also in 1995, al Qaeda bombed the Khobar Towers in Saudi Arabia.

345. Al Qaeda financier Zouaydi had close financial ties with Defendants Turki al Faisal al Saud and Mohammed al Faisal al Saud as is detailed *infra*.

346. Mullah Kakshar is a senior Taliban official who defected and provided a sworn statement regarding the transfer of funds from wealthy Saudis directly to al Qaeda and Osama bin Laden in Afghanistan. Mullah Kakshar’s sworn statement implicates Prince Turki as the

facilitator of these money transfers in support of the Taliban, al Qaeda, and international terrorism.

347. In 1996, according to various intelligence sources, a group of Saudi princes and prominent Saudi business leaders met in Paris and agreed to continue contributing, sponsoring, aiding and abetting Osama bin Laden's terrorist network.

348. In July of 1998, a meeting occurred in Kandahar, Afghanistan that led to an agreement between certain Saudis and the Taliban. The participants were Prince Turki, the Taliban leaders, as well as senior Pakistani intelligence officers of the ISI and representatives of Osama bin Laden. The agreement reached stipulated that Osama bin Laden and his followers would not use the infrastructure in Afghanistan to subvert the royal families' control of Saudi government and in return, the Saudis would make sure that no demands for the extradition of terrorist individuals, such as Osama bin Laden, and/or for the closure of terrorist facilities and camps. Prince Turki also promised to provide oil and generous financial assistance to both the Taliban in Afghanistan and Pakistan. After the meeting, 400 new pick-up trucks arrived in Kandahar for the Taliban, still bearing Dubai license plates.

349. Prince Turki was instrumental in arranging a meeting in Kandahar between Iraqi senior intelligence operative, the Ambassador to Turkey Faruq al-Hijazi, and Osama bin Laden, in December of 1998.

350. Prince Turki headed Istakhbarat until August 2001. Istakhbarat served as a facilitator of Osama bin Laden's network of charities, foundations, and other funding sources. Prince Turki is under consideration to be named as an ambassador from Saudi Arabia to the United Kingdom.

351. Born in Riyadh, Saudi Arabia in 1924, Prince Sultan is the son of Abdulaziz bin Abdul Rahman al Saud, founder of the modern Kingdom of Saudi Arabia and Husa bin Ahmad Sudairi. He is one of the six full brothers of King Fahd bin Abdulaziz al Saud. These seven brothers are referred to as the Sudairi seven. Prince Sultan was appointed Governor of Riyadh in 1947.

352. Prince Sultan has been the Second Deputy Prime Minister, Minister of Defense and Aviation since 1962 and Inspector-General of the Kingdom of Saudi Arabia. In addition, Prince Sultan is Chairman of the Supreme Council for Islamic Affairs which has oversight and control over charities in Saudi Arabia. Defendant and Saudi Defense Minister Sultan bin Abdulaziz al Saud is believed to be a shareholder of Nimir Petroleum.

353. Beginning with the Gulf War, Prince Sultan took radical stands against western countries and publicly supported and funded several Islamic charities that were sponsoring Osama bin Laden and al Qaeda operations, including the International Islamic Relief Organization, Muslim World League, World Assembly of Muslim Youth and al-Haramain.

354. Prince Sultan has been involved in the sponsorship of international terrorism through the IIRO and other Saudi-funded charities. Defendant International Islamic Relief Organization is a direct arm of the Saudi Royal family, according to Arafat el-Asahi, the Director of the Canadian branch of the International Islamic Relief Organization. The United States Department of State has also identified IIRO as an organization which sponsors terrorism. Dr. Adnan al Basha, the Secretary General of the International Islamic Relief Organization publicly thanked Prince Sultan on December 22, 2000, for his support and aid.

355. Shortly after the September 11, 2001 attacks, Prince Sultan publicly accused the “Zionist and Jewish lobby” of orchestrating a “media blitz” against the Saudi Kingdom. A Saudi

embassy press release announced in April 2001 that “Prince Sultan affirms [the] Kingdom’s Support” for the Palestinian Intifada, to the tune of \$40 million already disbursed to “the families of those martyred” and other “worthies.”

356. Prince Sultan argued against the United States use of Saudi bases to stage military strikes on Afghanistan after the September 11, 2001 attacks, stating that his government “will not accept in [Saudi Arabia] even a single soldier who will attack Muslims or Arabs.” Saudi Minister of Defense Prince Sultan stated his country would not permit allied aircraft to launch preventive or major retaliatory strikes against Iraq from bases in Saudi Arabia. Prince Sultan expressed the hope that the Arab Nationals who have fought alongside the Taliban and al Qaeda will be allowed to return safely to their respective countries.

357. In 1994, the Saudi Kingdom issued a royal decree banning the collection of money in Saudi Arabia for charitable causes without official permission. King Fahd set up a Supreme Council of Islamic Affairs, headed by his brother Prince Sultan to centralize, supervise and review aid requests from Islamic groups. This council was established to control the charity financing and look into ways of distributing donations to eligible Muslim groups.

358. Consequently, as Chairman of the Supreme Council, Prince Sultan could not have ignored the ultimate destinations of charitable funding, and could not have overlooked the role of the Saudi charitable entities identified herein in financing the al Qaeda terrorist organization.

359. Despite that responsibility and knowledge, Prince Sultan personally funded several Islamic charities over the years that sponsor, aid, abet or materially support Osama bin Laden and al Qaeda: the International Islamic Relief Organization (and its financial fund Sanabel el-Khair), al-Haramain, Muslim World League, and the World Assembly of Muslim Youth. All of these charities are and/or were involved in the financing of international terrorism.

The total of Prince Sultan's donations to these entities since 1994 amounts to at least \$6,000,000, according to official and public reports.

360. Prince Sultan's role in the IIRO's financing is of significance. Since the IIRO's creation in 1978, Prince Sultan participated by donations and various gifts to the charity. In 1994 alone, he donated \$266,652 to the Islamic International Relief Organization. Since 1994, the amount funneled by Prince Sultan into IIRO is reported to be \$2,399,868. Prince Sultan's role in directly contributing to and in the oversight of IIRO evidences his material sponsorship, aiding and abetting of international terrorism. Prince Sultan maintains close relations with the IIRO organization headquarters and knew or should have known these assets were being diverted to al Qaeda.

361. Prince Sultan is also a large financial contributor of the Muslim World League. Prince Sultan donated during a television fundraising campaign for MWL :

The total collection made as a result of the television campaign was SR 45,000,000, with the Emir of Riyadh, Prince Sultan, donating a million Saudi Riyals (\$533,304).

362. Prince Sultan is also a regular donator to the World Assembly of Muslim Youth (or "WAMY"). WAMY was founded in 1972 in a Saudi effort to prevent the "corrupting" ideas of the western world influencing young Muslims. With official backing it grew to embrace 450 youth and student organizations with 34 offices worldwide. WAMY has been officially identified as a "suspected terrorist organization" by the FBI since 1996 and has been the subject of numerous governmental investigations for terrorist activities.

363. At best, Prince Sultan was grossly negligent in the oversight and administration of charitable funds, knowing they would be used to sponsor international terrorism, but turning a

blind eye. At worst, Prince Sultan directly aided and abetted and materially sponsored al Qaeda and international terrorism.

364. Prince Mohammed is engaged in the sponsorship of international terrorism through Dar al Maal al Islami, the Faisal Islamic Bank and Al Shamal Islamic Bank. As detailed *supra*, until 1983, DMI was under M. Ibrahim Kamel's chairmanship. On October 17, 1983, Prince Mohammed became CEO of DMI. Under Prince Mohammed's chairmanship, DMI developed banking, investment and insurance activities in approximately twenty offices across the world. DMI was founded twenty years ago to foster the spread of Islamic banking across the Muslim world and its Board of Directors included Haydar Mohamed bin Laden, a half-brother of Osama bin Laden. Faisal Islamic Bank Sudan was one of the five main founders of Al Shamal Islamic Bank.

365. Prominent Saudi businessman and terrorism financier Adel Abdul Jalil Batterjee is the Chairman and one of the largest shareholders of Al Shamal Islamic Bank in Khartoum, Sudan. Al Shamal Bank is an instrumental bank in Osama bin Laden's financial support network. Osama bin Laden used Al Shamal Bank for the funding of his al Qaeda network leading up to the 1998 United States Embassy bombings in Africa. During the planning of these bombings, Jamal Ahmed al-Fadl, an al Qaeda operative, received \$250,000 from the Al Shamal Bank in Sudan to purchase a plane for al Qaeda. The plane was used to coordinate al Qaeda's efforts in preparation for the 1998 Embassy bombings, which killed over 250 people and injured 1,000 more. Defendant Faisal Islamic Bank was implicated during al-Fadl's 2001 United States trial regarding the bombings as holding and managing bank accounts for al Qaeda operatives.

366. As the head of DMI, Prince Mohammed knew or should have known of these and other activities and acted as an aider and abettor and material sponsor of al Qaeda, Osama bin Laden, and international terrorism.

367. Prince Abdullah al Faisal was born in 1923 and is the son of former King Faisal. His brothers include Defendant Turki al Faisal al Saud and Defendant Mohammed al Faisal al Saud.

368. Prince Abdullah al Faisal, a former official of the Saudi Ministry of Interior, was Minister of Health between 1949 and 1950. He is Chairman of the Arabian Establishment for Trade and Shipping Ltd, Qassim Cement Company and owner of Alfaisaliah Group. He is also Chairman of the board of trustees of the King Faisal Foundation.

369. Alfaisaliah Group (a/k/a Al Faisal Group Holding Co.) (or “AFG”) is based in Riyadh, Saudi Arabia. Its main shareholder is Prince Abdullah al Faisal. Its Chairman is Mohammed Abdullah al Faisal, Prince Abdullah al Faisal’s son.

370. Alfaisaliah Group was reorganized in 2001 with Prince Abdullah al Faisal holding 97.5% of the shares, and businessman Mohammed bin Abdulrahman al Ariefy, President, owning 2.5 percent of the shares. The company at that time changed its name to al Faisal Group Holding Co., a successor in interest to Alfaisaliah Group.

371. Founded in 1970, the Alfaisaliah Group is a large commercial conglomerates with 3,000 employees and thirteen subsidiaries involved in five business sectors (Food & Beverages, Petrochemicals & Plastics, Entertainment & Multimedia, Consumer Electronics, and High Tech & Information Technology). Alfaisaliah Group is the representative agent in Saudi Arabia of several international companies, including Sony, Hewlett Packard, MegaStar, Columbia Tristar, 20th Century Fox, Motorola, Toshiba and Danone. Its main subsidiaries include Modern

Electronic Establishment, Modern Petrochemicals Establishment, Al Safi Dairy Establishment, Al Faisalia Agricultural Establishment, Al Faisalia Real Estate Establishment and Al Faisalia Computer & Communication Services Establishment. Alfaisaliah Group maintains branches in Jeddah, Al Khobar, Khamis Mushait, Madinah, Qassim, Arar and Tabuk.

372. According to FBI records, September 11, 2001, hijacker Hani Saleh H. Hanjour (a/k/a Hani Saleh Hanjour, Hani Saleh, Hani Hanjour) is a Saudi national from the city of Taif, Saudi Arabia. Hanour was one of the hijackers on American Airlines flight 77 that crashed into the Pentagon on September 11, 2001. His brother Abdulrahman Saleh Hanjour harboured him in Tucson, Arizona, in the months preceding the September 11, 2001 attacks.

373. The two Hanjour brothers and another al Qaeda suspect in the attacks, Abdal Monem Zelitny, had a registered address in Taif, Saudi Arabia, under the name of Alfaisaliah, P.O. Box 1717, Taif, Saudi Arabia. The name and address are the branch office of Alfaisaliah Group in Taif, a subsidiary of the Riyadh based holding company. As detailed above, Alfaisaliah is owned and controlled by Prince Abdullah al Faisal, son of King Faisal, and for whom, terrorist financier Zouaydi was worked as an accountant in Jeddah, Saudi Arabia.

374. One of Prince Abdullah al Faisal's accountants in Jeddah, Saudi Arabia was Defendant Muhammed Galeb Kalaje Zouaydi, (a/k/a Abu Talha) (or "Zouaydi") convicted in Spain for financing al Qaeda operations in Europe. Zouaydi set up Spanish companies established during the time he was staying in Saudi Arabia and working for Prince Abdullah al Faisal, between 1996 and 2000. Zouaydi laundered Saudi money through Spain to an al Qaeda cell in Germany.

375. Evidence from eye witnesses indicates that Zouaydi was present in offices of Prince Abdullah al Faisal in Jeddah. Zouaydi was also recognized in the offices of Dr. Bakhsh

Hospital with its Chairman, Abdul Rahman Taha Bakhsh, brother of businessman Abdullah Taha Bakhsh, former director of Zakat and Income Tax at the Saudi Ministry of Finance. Both brothers are members of the board of Trading Engineering & Contracting Corp. (Traco), based in Jeddah, Saudi Arabia.

376. Evidence recovered by the Spanish authorities shows that Muhammed Galeb Kalaje Zouaydi, a Syrian born businessman, along with several associates in Spain and Europe, funneled money from the Saudi-based company, Mushayt for Trading Establishment (or “Mushayt”), through Spanish corporations to entities and individuals known to be associated with the al Qaeda terrorist organization in Europe. Prince Abdullah al Faisal is implicated in these financial transactions of material support to al Qaeda, as is Prince Turki. When this and other evidence has been fully analyzed, additional parties or persons may be implicated.

377. According to Spanish authorities, Mushayt received funds and donations from other companies and individuals in Saudi Arabia that were funneled to al Qaeda through Spain. This fraudulent scheme provided material, financial support to the Global Relief Foundation in Spain, to Abdul Fattah Zammar and Mamoun Darkazanli in Germany, who maintained the bank accounts of hijacker Mohamed Atta and other members of the Hamburg al Qaeda cell. These co-conspirators (Zammar and Darkazanli) are awaiting trial in Germany on charges of providing financial and logistical support to the organization of the September 11, 2001 attacks.

378. Ghasoub Al Abrash Ghalyoun (a/k/a Abu Musab), an associate of Zouaydi’s in Spain, was observed filming future targets of al Qaeda in the United States. In his videotapes, Spanish authorities found pictures of the World Trade Center taken on August 9, 1997.

379. Prince Naif is the Chairman of the Saudi Arabian Committee for Support of the Intifada al Quds. According to documents captured by the Government of Israel in the

Palestinian territories during operation Defensive Shield, this committee knowingly transferred large sums of money to the families of Hamas terrorists who had executed murderous attacks against Israelis. Prince Naif, along with others in Saudi Arabia, supports suicide martyrs.

380. Abu Mazen, the Palestinian Authority representative in Saudi Arabia, wrote a letter dated January 9, 2001, to Salman Bo Abed Al Aziz, the Governor of Riyadh Province and Chairman of the Popular Committees for Support of the Palestinian Jihadis. The letter, written on behalf of Palestinian President Yasser Arafat, states that the Saudi Arabian Committee for Support of the Intifada al Quds directly funds terrorism:

The Saudi committee responsible for transferring the contributions to beneficiaries is sending large sums to radical committees and associations including the Islamic Association which belongs to Hamas, the Al-Atzlach Association [most likely the Al-Salah Association, a known agency of the Hamas in Gaza], and brothers belonging to the Jihad in all areas. (emphasis added.)

381. The letter is a request by Yasser Arafat to the Government of Saudi Arabia to curtail its funding of the Hamas movement in favor of the military faction of the Palestinian Authority, Fatah. Prince Naif has engaged in a pattern of conduct that aids, abets, and materially sponsors international terrorism and Al Qaeda. As with Prince Sultan and Prince Turki, Prince Naif has engaged in material support, including but not limited to monetary payoffs, to Osama bin Laden's al Qaeda.

382. Prince Naif is Saudi Minister of Interior and heads the Saudi Committee for relief to Afghans, which supervises the activities of Defendant al-Haramain Foundation whose sponsorship of terrorism is detailed *supra*. The Minister of Interior, by function, controls the activities of Islamic Charities and is empowered to verify their legality and conduct. At a minimum, Prince Naif has breached his duties of care with respect to this responsibility.

383. Abdullah bin Abdul Muhsen al Turki (or “al Turki”) is a Saudi and the former rector of the University of Riyadh (1994), former minister of Waqf and Islamic Affairs until 2000, and advisor to King Fahd. Al Turki is also Secretary General of the Muslim World League.

384. Abdullah bin Abdul Muhsen al Turki is a counselor to the government of Saudi Arabia and was clearly in contact with al Qaeda financier Zouaydi. Abdullah bin Abdul Muhsen al Turki acted as Saudi Minister of Islamic Affairs for many years and clearly was in a position where he should have known about the reach of international terrorism and al Qaeda. Al Turki later became a shareholder in the front organization known as Promociones which bought real estate but did no actual construction work, although listing itself as a construction company. Instead, that company made direct payments to al Qaeda cells.

385. Al Turki organized in January 2002 a conference of scholars who stated that terrorism is not equal to Jihad, and defined a right to struggle “against occupiers ... and those who renege on their commitments or prevent Muslims from peacefully preaching.”

386. On October 10, 1999, Zouaydi, a senior al Qaeda financier for Europe, and Abdullah bin Abdul Muhsen al Turki, then advisor to King Fahd, agreed to participate as business partners to a construction project in Madrid, Spain. A contract was written by Zouaydi Company in Spain stating that both parties will finance 50% of the project. The incomes would be split 70/30 between al Turki and Zouaydi.

387. Zouaydi was part of an international terrorist movement for global jihad which encompassed the al Qaeda network. This network channeled money directly to the perpetrators of September 11, 2001, and to similar global jihad movements planning terrorist actions in San Francisco, Bali, and elsewhere.

388. Several faxes in support of this enterprise, scheme and conspiracy were sent by Zouaydi to al Turki. In one fax sent on October 15, 1999, Zouaydi asks al Turki to send the money through al Rajhi Bank (which hold his accounts in Saudi Arabia).

389. As a guaranty for the operation, Zouaydi sent a check of 191 million Pesetas on September 15, 1999, to al Turki as beneficiary from Banco Sabadell in Madrid. On October 22, 1999, a fax was sent to al Turki by Prol & Asociados law firm in Madrid referring to a telephone conversation with someone acting on behalf of al Turki, Waleed O Houssainy, about a project of al Turki to buy 100% of Zouaydi's Spanish company.

390. On February 4, 2000, Zouaydi sent a fax to al Turki, referring to him as "advisor to King Fahd." In his declarations to the Spanish judge on April 26, 2002, Zouaydi refers to al Turki as "advisor to King Fahd." Al Turki's representative, Waleed al Hussein, is the manager of a major Saudi company owned by the prominent shareholders.

391. Prince Turki served in the same cabinet as Chief of Intelligence, which shared information with al Turki. It was widely known that al Qaeda members' and supporters' interpretation of the Koran provides that suicide bombing is a permissible act, and that al Qaeda's political goal is to establish global extremist Muslim rule. For al Qaeda and some extremist Saudi supporters, support of the Taliban may have had less to do with Afghanistan's autonomy and much more to do with funding a staging platform and material sponsorship for worldwide global jihad.

392. The Saudi High Commission, (a/k/a the Saudi High Relief Commission) (or "SHC") was founded in 1993 by Prince Salman bin Abdul Aziz al Saud (or "Prince Salman"), the Mayor of Riyadh and a son of King Fahd, a prime supporter of the charity. Hailed as the largest fundraising effort in the Arab and Muslim world, the Saudi High Commission claims to

have spent more than \$600 million in aid to Bosnian Muslims impoverished by the country's recent civil war.

393. Despite the Saudi commission's generous efforts in Bosnia, it has been widely criticized by aid agencies and Bosnian intellectuals for importing the extreme form of Saudi Islam, Wahhabism, which is alien to the more moderate, secular form found in Bosnia. Bosnian officials claim that the Wahhabis' intolerant and anti-Western form of Islam contradicts and offends Bosnian tradition and undermines the country's rich and diverse religious heritage.

394. On October 21, 2001, five Algerians were arrested in Bosnia Herzegovina on criminal charges of international terrorism following a threat to the United States embassy. The incident resulted in the five day closure of the United States and British embassies for what both embassies called "a credible security threat." The plot was discovered when United States intelligence intercepted a telephone conversation between two of the accomplices about the mission. During this telephone conversation, one of the terrorists said, "American interests would be jeopardized within 48 hours."

395. This group of Algerians is suspected to be a part of the al Qaeda network. The NATO Secretary-General, George Robertson, stated that at least one of the five had "direct links with al Qaeda and Osama bin Laden." The leader of the group, Bensayah Belkacem, has been identified as a top al Qaeda lieutenant. In October, 2001, Belkacem was arrested at his apartment in Zenica, Bosnia, where authorities found phony passports and a mobile telephone listing for Abu Zubeida, al Qaeda's third-in-command. According to phone transcripts, Belkacem was also in phone contact with an al Qaeda military commander Abu al-Maid.

396. One of the six Algerian terror suspects, Sabir Lamar, worked for the Saudi High Commission as an Arabic language teacher. Sahir Lamar is said to have fought in Afghanistan

with the Mujahideen. He is married to the daughter of a former local employee at the United States embassy in Sarajevo and is believed to have had keys to the building, in which photographs and other information were available.

397. In October, 2001, United States forces raided the Sarajevo branch of the Saudi High Commission of Bosnia and Herzegovina. United States forces found computer hard drives with photographs of the World Trade Center before and after its collapse as well as photos of United States embassies in Kenya and Tanzania and the USS Cole. Additionally, United States forces discovered files on pesticides and crop dusters, information about how to make fake State Department badges as well as photographs and maps of Washington, marking government buildings. About \$100,000 worth of local currency was found in a safe, as well as anti-Semitic and anti-United States computer material geared toward children.

398. The Financial Police of the Federation of Bosnia Herzegovina Ministry of Finance analysis of the documents seized from the offices of the Saudi High Commission describe the organization as a front for radical and terrorism-related activities:

Members of the SFOR have on premises of the Saudi High Commission Relief for Bosnia and Herzegovina confiscated some documentation for which it can be claimed with certainty that it does not belong in the scope of work of a humanitarian organization (various photographs of the World Trade Center, sketches of military bases, certain photographs of military ships, civil airplanes, certain specially protected facilities, and other).

399. In October 2001, a Bosnian spokesman announced that between 100,000 DM and 200,000 DM in cash were also seized in the offices of the Saudi High Commission. The Saudi High Commission used 24 vehicles with diplomatic plates to transport members and material inside Bosnia Herzegovina.

400. Prince Salman has a history of funding Islamic extremism. Prince Salman was named Chairman of the General Donation Committee for Afghanistan (a/k/a Afghan Jihad

Support Committee) in 1980. In 1981, the General Donation Committee for Afghanistan gave \$39 million dollars to aid the Afghan mujahideen. Prince Salman stated the donation was made to “our Afghan brothers.”

401. In 1999, Prince Salman made a donation of \$400,000 during a fund-raising event organized for Bosnia Herzegovina and Chechnya by Defendants International Islamic Relief Organization, World Assembly of Muslim Youths, and Al-Haramain Foundation.

402. A letter seized by the Israeli Defense Forces during Operation Defensive Shield, evidences the involvement of Prince Salman in financing terrorist organizations. The letter dated December 30, 2000, was issued by the Embassy of the State of Palestine in Riyadh to Prince Salman bin Abdul Aziz al Saud, Chairman of the Popular Committees for Support of the Palestinian Fighters. The Palestinian ambassador expresses the concern of Yasser Arafat regarding funding of radical organizations.

I wish to inform you that [Yasser Arafat] called me and asked to convey his request to mediate and intervene and express his opinion about what is happening in our homeland. The Saudi committee responsible for transferring contributions to beneficiaries is sending large sums to radical committees and associations, including the Islamic Association which belongs to Hamas, the Al-Salah Association, and brothers belonging to the Jihad in all areas. This has a bad affect on the domestic situation and also strengthens these brothers and thus has a bad impact on everybody.

403. Prince Salman is engaged in the aiding and abetting and material sponsorship of international terrorism, including al Qaeda and Osama bin Laden.

404. Given its level of financing, the SHC does not provide adequate financial aid to the needy. The Saudi High Commission was functioning at least until February 2001, when the announcement was made that the organization provided in a nine-year period a total of \$560,900,000 in donations, while it was obvious, since at least year 2000, that funds sent to help Bosnia Herzegovina were diverted for other purposes. For instance, in September 2000, Prince

Salman was alerted by a letter from the Bosnian association “Mothers of Srebrenica and Podrinje” in which it was clearly claimed that the Saudi High Commission in Bosnia Herzegovina didn’t meet its goal in terms of financial help, accusing the director of the Sarajevo office.

405. This association stated that while Prince Salman announced that 200 million DM were collected in only one day after Srebrenica’s fall in July 1995, for Srebrenica inhabitants, the Saudi assistance did not reach Srebrenica people. The association stated that:

The director of the High Committee (Sheikh Naser bin Abdurahman al Said) is negating your statements, which we do not doubt, but we doubt the work of the director of the Committee who openly stands to the defense of the corrupted authorities in Sarajevo.

406. Prince Salman knowingly failed to take appropriate actions regarding the management and use of funds of the Saudi High Commission in Bosnia Herzegovina, as proven in the raids conducted in the Sarajevo office of the organization less than one year later.

407. Saudi High Commission financial records fail to account for \$41 million dollars. United States investigative forces are currently reviewing suspicious financial records of the Saudi High Commission. Matthew Levitt, a former FBI analyst and now a senior fellow at the Washington Institute for Near East Policy, says investigators have been unable to trace about \$41 million dollars donated to the charity.

408. The organization Saudi High Relief Commission to Bosnia and Herzegovina has been required by the High Court in Sarajevo to submit banking and account records, an inventory of assets and liabilities and an accounting of all other business transactions.

409. Abdul Aziz Al Ibrahim (or “Al Ibrahim”) is a Saudi citizen and the brother-in-law of King Fahd of Saudi Arabia. His sister, Jawhara, is the second wife of King Fahd.

410. Abdul Aziz Al Ibrahim acquired in 1989 a portion of the Marina Del Rey real estate venture in Los Angeles, through various offshore companies. American authorities discovered a loan of \$132 million that was granted to Al Ibrahim at the end of 1989 by BCCI. Al Ibrahim was one of BCCI's leading loan beneficiaries.

411. Apart from being a lead investor in Marina del Rey, Al Ibrahim real estate assets have included Ritz-Carlton hotels in New York, Washington and Houston and Aspen, a hotel and office complex near Chicago's O'Hare International Airport, undeveloped property in the hills high above Bel-Air and largely vacant land near Disney World in Florida. Ritz-Carlton hotels have decided in 1997 to pull back their name from the facilities by terminating management agreements after they became controlled by Al Anwa USA company owned by Abdul Aziz Al Ibrahim.

412. The registered President of Al Anwa USA is Tarek Ayoubi, who also manages Anwa Hotel & Resort International, Luxury Holdings Inc, MDR Hotel and NY Overnight Inc, all based at the same address in Marina Del Rey.

413. Al Anwa holding is Al Anwa for Contracting Establishment (a/k/a Al Anwae Trading and Contracting Establishment, a/k/a Anwae Contracting Est) a construction company owned by Abdul Aziz Al Ibrahim. Al Anwa for Contracting is shareholder, along with Defendant Dallah al Baraka (Chaired by Defendant Saleh Abdullah Kamel), of the National Environmental Preservation Co Ltd in Jubail, Saudi Arabia.

414. With another brother, Walid, along with Defendant Saleh Abdullah Kamel, Abdul Aziz Al Ibrahim created in 1991 the leading Arab television satellite service, Middle East Broadcasting Corp (or "MBC"), which purchased the press agency United Press International (or "UPI") in 1992.

415. In 1990, he created the Ibrahim bin Abdul Aziz Al Ibrahim Foundation whose official stated aim is humanitarian assistance. The organization is present in Kenya, Bosnia, Chechnya, South America and Southern Asia.

416. The Ibrahim bin Abdul Aziz Al Ibrahim Foundation has built, among others, mosques in Dusseldorf, Gibraltar, Milan and Moscow.

417. The organization's branch in Nairobi in Kenya was associated with Osama bin Laden's network in the FBI's investigation into the attacks against the American embassies on August 7, 1998.

418. In September 1998, the Kenyan government canceled the registration of five Islamic relief agencies for allegedly supporting terrorism including Defendant Al-Haramain Foundation, Help African People, the Islamic Relief Organization, the Ibrahim bin Abdul Aziz Al Ibrahim Foundation, and Mercy Relief International. The authorities claimed that materials for the bomb were smuggled in as relief aid with the help of Islamic relief agencies.

419. The decision was announced by the Kenyan government's NGO coordinator who declared that:

Our investigations reveal that the operations of these organizations are inconsistent with the reasons for which they were registered . . . These organizations are supposed to work for the welfare of Kenyans, but are instead endangering Kenyan's lives . . . They had been found to be working against the interests of Kenyans in terms of security.

420. After several organizations appealed this decision, Kenya's High Court has blocked the deregistration of four of the five non-governmental organizations. The International Islamic Relief Organization, Moslem World League, Al-Haramain Foundation, and Mercy International Relief Agency can still operate pending an appeal. Only the Ibrahim bin Abdul Aziz Al Ibrahim Foundation did not ask the court for an appeal.

421. In a study paper dated October 1999, called “The New Azerbaijan Hub: How Islamist operations are targeting Russia, Armenia and Nagorno-Karabagh”, Yossef Bodansky, Senior Editor of Defense and Foreign Affairs' Strategic Policy refers to the Ibrahim bin Abdul Aziz Al Ibrahim Foundation as one of those which provided help to Osama bin Laden.

The key Islamist facilities are concealed as charity and educational organizations affiliated with the web used by bin Laden's networks. Moreover, the headquarters of these organizations are stuffed with Arab "teachers" and "managers" from the ranks of such organizations as the International Muslim Brotherhood, the Islamic Salvation Front, several branches of Islamic Jihad, and the National Islamic Front of Sudan. The key organizations are . . . Al Ibrahim Foundation. Very little is known about this Baku-based charity except that its Arab principals have huge amounts of cash in hard currency. They are involved in acquisition of real estate among other "educational" projects.

422. Other reports suggest that Ibrahim bin Abdul Aziz Al Ibrahim Foundation was funding the Islamic Movement of Uzbekistan (or “IMU”), an affiliate of al Qaeda, whose leaders met Osama bin Laden in 1999 in Kandahar, Afghanistan. Reports stated that the IMU received \$270,000 dollars from the Ibrahim bin Abdul Aziz Al Ibrahim Foundation.

423. In 1999, the Russian special services and reconnaissance disseminated a report stating that Chechen militants were allegedly being trained in three paramilitary bases in Azerbaijan and that three Islamic organizations - the Ibrahim bin Abdul Aziz Al Ibrahim Foundation, World Youth Islamic Assembly and Islamic Rescue Organization - had taken part in setting up these bases.

424. During an investigative television program by the Russian NTV, on November 1, 2002, it was disclosed that in July 2002, more than a hundred young men from various regions of Russia attended a seminar organized by the clerical board of Muslims of the Asian part of Russia at Pervouralsk. The official goal of the event was to instruct to religious matters. One of the

courses was based upon a study in sharia disciplines, published by Ibrahim bin Abdul Aziz Al Ibrahim, which emphasized (quote):

Armed struggle in the name of Allah, for his word to be above all else...Sacrifice your life in witness of Allah's religion.

425. According to a document summarizing the seminar “the main task of the seminar was to select candidates for further instruction at Saudi universities, and to raise the level of Islamic awareness.” After the NTV findings, an investigation was conducted and a criminal procedure is pending in Russia.

426. The event took place at the Middle Urals Kaziat Muslim community, where Defendant Abdullah bin Abdul Muhsen al Turki settled in 1995 a Joint committee for Islamic Action and Studies with representatives from Defendants Muslim World League, Islamic International Relief Organization, World Assembly for Islamic Youth, along with the Ibrahim bin Abdul Aziz Al Ibrahim Foundation.

427. The role of certain Saudis in the sponsorship of al Qaeda cannot be ignored. This is evidenced in the al Qaeda organization’s own words. Captured al Qaeda documents state that among all the Muslim governments in the world, the government of Saudia Arabia is the only representative model Islamic government, the greatest center of Islam as al Qaeda moves to expel the Jews and Christians from Arab lands through mass murder.

428. Osama bin Laden is referred to in al Qaeda documents as the billionaire merchant prince and the beloved member of Saudia Arabia's billionaire family who has been led by the bin Laden family to aim the Kalishnikow at super power America.

429. Information found in the possession of al Qaeda terrorists indicates that financial support of international terrorism by wealthy Saudis is designed to undermine moderate Arab

regimes and movements while providing support for Saudi legitimacy as the strict guardians of Mecca and Medina.

430. These acts described herein constitute a pattern of conduct in sponsoring and promoting radicals and international terrorism generally, as well as al Qaeda and Osama bin Laden, specifically. The participation of certain Saudi nationals in the sponsoring and promotion of terrorism is widely known if politically unpalatable. As USA Today reported back in 1999:

More than a year after the U.S. Embassy bombings in East Africa, prominent businessmen in Saudi Arabia continue to transfer tens of millions of dollars to bank accounts linked to indicted terrorist Osama bin Laden, senior U.S. intelligence officials told USA Today.

The money transfers, which began more than five years ago, have been used to finance several terrorist acts by bin Laden, including the attempted assassination in 1995 of Egyptian President Hosni Mubarak in Ethiopia, the officials said.

Secretary of State Madeleine Albright is expected to raise the issue with Prince Sultan, the Saudi defense minister, during his visit to Washington next week. Saudi Arabia, the main U.S. ally in the Persian Gulf, has pledged to fight terrorism.

According to a Saudi government audit acquired by U.S. intelligence, five of Saudi Arabia's top businessmen ordered the National Commercial Bank (NCB), the kingdom's largest, to transfer personal funds, along with \$3 million diverted from a Saudi pension fund, to New York and London banks.

The money was deposited into the accounts of Islamic charities that serve as fronts for bin Laden.

The businessmen are paying bin Laden "protection money" to stave off attacks on their businesses in Saudi Arabia.

431. Certain members of the Saudi Royal family and related persons overtly and covertly aid, abet, and materially support the IIRO and other charities, despite their roles in terrorist financing. Certain members of the Saudi Royal family, along with other wealthy Saudi supporters, contributed to the IIRO and related charities as a way to support al Qaeda without

suffering from the social (and legal) ramifications that such contributions bring. The IIRO received funds which were passed on to terrorists in part from the Zakat payments from individuals and companies in the kingdom of Saudi Arabia. The Saudi Royal family members own substantial assets in the United States of America, do substantial business in the United States of America, the profits of which in part are used to fund international terrorist acts, including those which led to the murderous attacks of September 11, 2001.

432. As the 2002 Report on terrorist financing by the independent task force of the Council on Foreign Relations pointed out: “it is worth stating unambiguously what official U.S. government spokespersons have not: [F]or years, individuals and charities based in Saudi Arabia have been the most important source of funds for al Qaeda; and for years, Saudi officials have turned a blind eye to this problem.” The report goes on to note that this is hardly surprising given that the Saudis possess the greatest concentration of wealth in the area.

Delta Oil Company

433. Delta Oil Company (or “Delta Oil”) is based in Jeddah, Saudi Arabia. The chairman of Delta Oil Company is Badr bin Mohammed al-Aiban (or “Badr al-Aiban”). Most of Delta Oil operations are conducted from London offices of Delta Oil Ltd, Delta Oil Services UK Ltd., and Delta Hess Khazar Ltd.

434. Badr al-Aiban is a former consultant in the Saudi state oil sector. His deputy, Nabil Al Khowaiter, is a former executive with Aramco. Badr Al-Aiban's father was advisor to Crown Prince Abdullah. A Delta Oil official company statement stressed that:

In gratitude for his service, the Crown Prince awarded the senior al-Aiban the post of deputy commander of the National Guard. After his death, Abdullah took al-Aiban's three sons under his wing. Badr (al-Aiban) himself was brought up as a member of the al-Saud household.

435. In 1996, Delta Oil Company formed a joint-venture with Nimir Petroleum Company, a company controlled by Osama Bin Laden's brother in law, financial backer, and sponsor of international terrorism Defendant Khalid Bin Salim Bin Mahfouz. This joint venture was known as Delta Nimir Khazar Limited and its purpose was to negotiate with the Taliban regime. In December 1996, the Taliban announced that the Taliban government had agreed to allow a proposed pipeline through Afghanistan.

436. In October 1997, six energy companies signed a deal to create Centgas, a consortium for the construction of a pipeline from Turkmenistan and across western Afghanistan to Pakistan. Delta Oil Company took a 15 percent stake in the consortium.

437. The Taliban were offered various gifts, material support and incentives from Delta Oil, including fax machines and generators. One of the oil consortium leaders acknowledged that the group spent between \$15 million and \$20 million in promotion and sponsorship related to the Taliban. Delta Oil knew or should have known that the Taliban regime was harboring and sponsoring al Qaeda and Osama bin Laden. Delta Oil acquired a majority share in the CentGas consortium in 1998 after the withdrawal of a United States partner in protest of the Taliban's mis-treatment of women.

438. Between 1996 and 1998, Delta Oil materially supported the Taliban regime, despite the widespread knowledge they harboured and supported al Qaeda terrorists, Osama bin Laden, and al Qaeda terrorist training camps.

439. Since at least August 1996, Osama Bin Laden has been named as a financier and promoter of Islamic extremist terrorist activities. A State Department fact sheet reported that Osama Bin Laden had various business interests in Afghanistan and that he was running several

military training camps there for the al Qaeda terrorist organization, with the support of the Taliban.

440. The 1996 Report on Patterns of Global Terrorism publicly described the affiliation between the Taliban regime and the al Qaeda terrorist network:

The Taliban militia, which took over the capital city, Kabul, in September, has permitted Islamic extremists to continue to train in territories under its control even though they claimed to have closed the camps. (...) Saudi-born extremist Usama Bin Ladin relocated to Afghanistan from Sudan in mid-1996 in an area controlled by the Taliban and remained there through the end of the year, establishing a new base of operations. In August, and again in November, Bin Ladin announced his intention to stage terrorist and guerrilla attacks against US personnel in Saudi Arabia in order to force the United States to leave the region.

441. A 1998 memo signed by Abu Hafz (the military name for Mohammed Atef), the military chief of al Qaeda, reveals how the oil interests were recognized by the terrorist organization and used as a leverage by the Taliban to remain in power. This memo was seized in a computer during the FBI investigations on the al Qaeda United States Embassy bombings in Africa.

442. Delta Oil Company knowingly financed, materially supported and/or aided and abetted the Taliban, al Qaeda, Osama bin Laden and international terrorism.

NIMIR LLC

443. Nimir LLC (a/k/a Nimir Petroleum Ltd, a/k/a NPC) (or “Nimir”), was founded by Defendant Khalid bin Salim bin Mahfouz, former Chief Executive Officer of Defendant National Commercial Bank, member of Saudi Aramco Supreme Council since March 1989. Defendants Abdulrahman bin Khalid bin Mahfouz and Khalid bin Mahfouz are shareholders and board members of Nimir. Abdulrahman bin Khalid bin Mahfouz is CEO of Nimir. Khalid Bin Mahfouz is President of Nimir.

444. Nimir Petroleum LLC is located in Jeddah, Saudi Arabia. In London, the executive board of Nimir Petroleum Ltd includes Khalid bin Mahfouz, Rashid Alkaff, Abdullah Basodan, Tek Soon Kong, and Simon Paul Binks. Nimir LLC includes a subsidiary named Nimir Petroleum Company USA Incorporated (or “NPC USA”) located in Dallas, Texas.

445. Abdulrahman Bin Khalid Bin Mahfouz, son of Khalid Bin Mahfouz, was trustee of the terrorist charity front Muwaffaq Foundation described *supra*. Abdulrahman Bin Khalid Bin Mahfouz was also member of the board and Vice Chairman of the Executive Management Committee of Defendant National Commercial Bank.

446. The Muwaffaq Foundation was founded by the Bin Mahfouz family. In 1991, Muwaffaq Foundation (or “Blessed Relief”) settled in Sudan with Defendant Yasin Al-Qadi acting as chairperson, providing material and financial support for Osama bin Laden’s operations in Sudan and elsewhere.

447. A Treasury Department statement reports that:

Muwafaq is an Al-Qaida front that receives funding from wealthy Saudi businessmen. (...) Saudi businessmen have been transferring millions of dollars to bin Laden through Blessed Relief.

448. Defendant Khalid bin Salim bin Mahfouz was such a Saudi businessman. Khalid bin Mahfouz is the former Chief Executive Officer of the Bank of Credit and Commerce International (or “BCCI”) and former Chief Executive Officer of the National Commercial Bank until 1999, and is a major financial sponsor and conduit for Osama bin Laden, al Qaeda operations, and international terrorism. As President of Nimir, Khalid bin Mahfouz further sponsored terrorism.

449. Defendant and Saudi Defense Minister Sultan bin Abdulaziz al Saud is believed to be a shareholder of Nimir Petroleum.

450. With Khalid bin Mahfouz, Nimir Petroleum engaged in a relationship with the Taliban regime in or about 1994. Nimir agreed to partner with the Saudi Delta Oil Company, by forming a joint-venture known as Delta Nimir Khazar Limited. Soon after, due to Nimir and Khalid bin Mahfouz' influence, an agreement was reached between a consortium of oil companies and the Taliban. Nimir's efforts to lobby for the consortium to reach an agreement with the Taliban regime included a meeting in November 1997 with a Taliban delegation to Texas.

451. Nimir materially supported, aided and abetted the Taliban regime, despite the widespread knowledge they harboured al Qaeda terrorists, training camps, and Osama bin Laden.

452. Since at least August 1996, Osama bin Laden has been named as a financier and promoter of Islamic extremist terrorist activities. A State Department fact sheet reported that Osama bin Laden had various business interests in Afghanistan and that he was running several military training camps there for the al Qaeda terrorist organization.

453. The 1996 Report on Patterns of Global Terrorism publicly described the affiliation between the Taliban regime and the al Qaeda terrorist network:

The Taliban militia, which took over the capital city, Kabul, in September, has permitted Islamic extremists to continue to train in territories under its control even though they claimed to have closed the camps. (...) Saudi-born extremist Usama Bin Ladin relocated to Afghanistan from Sudan in mid-1996 in an area controlled by the Taliban and remained there through the end of the year, establishing a new base of operations. In August, and again in November, Bin Ladin announced his intention to stage terrorist and guerrilla attacks against US personnel in Saudi Arabia in order to force the United States to leave the region.

454. A 1998 memo signed by Abu Hafz (the military name for Mohammed Atef), the military chief of al Qaeda, reveals how the oil interests were recognized by the terrorist organization and used as a leverage by the Taliban to remain in power. This memo was seized in

a computer during the FBI investigations on the al Qaeda United States Embassy bombings in Africa.

455. Nimir knowingly financed, materially supported and/or aided and abetted the Taliban, al Qaeda, Osama bin Laden and international terrorism.

Ary Gold LTD

456. Ary Gold LTD (a/k/a Ary Gold, a/k/a Ary International Exchange, a/k/a Ary Traders, a/k/a Ary Trade) (or “Ary Gold” or “Ary Group”) was created in 1972 by Abdul Razzak Yakoob, a Pakistani native businessman. Abdul Razzak Yakoob came from a Pakistani family of gold merchants, and chaired the Ary Group since 1974 with his brother Mohammad Iqbal. The head office of Ary Group is located in Dubai. The Ary Group is a conglomerate active in several industrial sectors (textiles, food, television broadcasting, and precious metals). Faced with a financial crisis in 1986, the group increased its trading operations on gold and silver bullion, through its two branches, Ary Gold and Ary Jewellers:

Ary Group started trading gold and silver in 1979. In 1994, it opened Ary Jewellers for the wholesale trade of manufactured jewelry, including Ary branded gold bars.

457. Abdul Razzak Yakoob confirmed the beginning of gold trading activity to Gulf News in 2001:

I realize that [...] we were working so hard to establish imported brands, in the end, we were hardly benefiting from the whole exercise. That’s when I made up my mind to launch our own products and promote it. Those days, whatever gold that was there in the market was labeled either London Gold or Swiss Gold, so I thought of branding our gold.

458. In addition, Abdul Razzak Yakoob diversified his activities. In October 2000, he created Ary Digital by taking over Sky Digital Asian Network (formerly known as the Pakistani Channel) in the United Kingdom. The channel is currently chaired by Abdul Razzak Yakoob’s

nephew, Salman Iqbal. The Pakistani Channel Limited, located in London, and is currently owned by Salman Iqbal (former dealer of Ary International Exchange), and his father, Mohammad Iqbal. This company is under the control of Abdul Razzak Yakoob, whose mission is thus:

The important thing for me is that, through my channel, people in all parts of the world can hear the sound of Azaan (call for prayers).

459. Since its beginning, the Ary Group grew through the Gold market. In 2002, the company acquired membership in the London Dullion Market Association. An official position on the gold market had not previously been taken by a Middle East company.

460. The Ary Group has a pattern of conduct consistent with money laundering in the Middle East. Ary was a key player in a scandal involving Benazir Bhutto in 1994. The former Pakistani Prime Minister was convicted of corruption with Abdul Razzak and Ary Gold:

In 1998, Pakistani investigators looking into government corruption found two checks, each for \$5 million, allegedly paid by ARY Gold in 1994 to Asif Ali Zardari, the husband of then-prime minister Benazir Bhutto, to secure a two-year monopoly on gold imports to Pakistan. While acknowledging he held the monopoly and shipped \$500 million in gold to Pakistan from 1994 to 1996.

461. Several executives of Ary Group were involved in the illicit scheme. It resulted from a close association between Ary Group Executives and the Bhutto government, and through the Muslim Commercial Bank. The Ary Group's responsibility in this corruption scheme was confirmed by a Pakistani court, yet the Pakistani sentence against Ary Group was rejected five times by Dubai legal authorities as baseless. Abdul Razzak was cleared of criminal charges in Dubai but still faces charges in Pakistan.

462. Abdul Razzak is President of the Memon Community in the United Arab Emirates and Chairman of the World Memon Organization (or "WMO"). Other Ary Group executives were founders and trustees of the organization, particularly Mohammad Iqbal

Yakoob. The Islamic charity WMO is very close to the Pakistani government. The headquarters of the organization is based in Dubai, and is in contact with others Islamic charities, particularly Defendant World Assembly of Muslim Youth. Described as a Muslim sect, WMO set up a cultural and business community between the United Arab Emirates and Pakistan. Hussain Lawai, the President of the Muslim Commercial Bank, was convicted of corruption in Pakistan in the Ary Group case, was member of the same Memon community in Dubai.

463. Gold trading is the principal source of revenue of the Ary Group. As the United States and its allies swept toward Afghanistan's main cities in the fall of 2001, the Taliban and al Qaeda network sent waves of couriers with bars of gold and bundles of dollars across the porous border into Pakistan. Financial transactions involving transfer of gold were centred in Dubai, the commercial capital of the United Arab Emirates and directly involved Ary Gold.

464. Persons aiding and abetting al Qaeda and facilitating and sponsoring terrorist conduct recently shipped large quantities of gold out of Pakistan to Sudan with the direct assistance of Ary Gold LTD of Dubai. Ary Gold was and is a principal conduit for transfer of wealth for years by some of the co-conspirators named herein. Ary Gold does substantial business in the United States of America.

465. Ary Gold, a branch of Ary Group, is involved in terrorist financing according to several investigations around the world, including by United States Customs Service. Ary Gold engaged in gold transactions on behalf of the Taliban and al Qaeda and in doing so offered material support, aiding and abetting.

466. Gold trading was done between Ary Gold and the Taliban. This “gold trail” was described by intelligence officers, law enforcement officials, gold brokers, and sources that have direct knowledge of some of al Qaeda’s financial movements. In addition, close relationships

between al Qaeda operatives and Dubai gold traders were established during the United States investigations on the 1998 United States Embassy bombings in Africa. Ary Gold has a pattern of conduct as it relates to aiding and abetting and materially sponsoring international terrorism, and assisting al Qaeda.

467. The bomb that exploded at the United States Embassy in Kenya was built outside Nairobi. Kenya bomber Fazul Abdullah Mohamed (or “Fazul”) rented the house where the Kenya bomb was assembled. Prosecution witness Tamara Ratemo, a Kenyan, told the court she rented Fazul her 10-room house outside Nairobi starting May 1, 1998. She also testified that Fazul was in frequent contact with gold traders in Dubai:

- Q. And did Mr. Fazhul tell you anything about why he needed such a large house?
- A. Yes, he said he had a family and he had some business people who would be coming to visit frequently.
- Q. And what kind of business people?
- A. He said the kind of people that are dealing with, they are trading in gold and they would come from Dubai.

468. Defendant Ary Gold is an aider, abettor and/or material sponsor of the Taliban, al Qaeda, Osam bin Laden and international terrorism.

The Republic of Sudan

469. Defendant, the Republic of Sudan (“Sudan”), is a foreign state within the meaning of 28 U.S.C. § 1391(f). Sudan maintains an Embassy within the United States at 2210 Massachusetts Avenue N.W., Washington, D.C. 20008-2831.

470. Since 1993, Sudan has been designated by the State Department as a foreign State that sponsors terrorism within the meaning of the Export Administration Act of 1979, 50 U.S.C. App. § 2405(j); the Foreign Assistance Act of 1961, 22 U.S.C. § 2371(b); and 28 U.S.C. § 2333. Sudan, by and through its agents and instrumentalities, has supported, encouraged, sponsored, aided and abetted and conspired with a variety of groups that use terror to pursue their goals.

Sudan has provided financing, training, safe-haven, and weapons for international terrorist groups, including al Qaeda and Osama bin Laden.

471. In or about 1991, Sudan through Hassan al-Turabi, leader of the Sudan's ruling National Islamic Front Party (or "NIF"), allowed the terrorist Osama bin Laden and his al Qaeda Party entrance into Sudan. During this time period, Sudan abandoned visa requirements for Arabs and actively encouraged Islamic militants to live within its borders. By the end of 1991, there were between 1,000 and 2,000 members of al Qaeda in Sudan. Following al Qaeda's move to the Sudan in or about 1991, Osama bin Laden established a headquarters in the Riyadh section of Khartoum, Sudan, an area heavily populated by Saudis.

472. Osama bin Laden was able to establish a powerful military and political presence in Sudan in the early 1990s, using a variety of business ventures to finance his activities, aided and abetted and materially sponsored by Defendants and co-conspirators named herein.

473. Osama bin Laden forged business alliances during the early 1990s with wealthy Sudanese, becoming intimately involved with the Sudanese government. Osama bin Laden invested with senior members of the NIF in the Defendant Al Shamal Islamic Bank in Khartoum. Osama bin Laden invested \$50 million dollars of his own funds into the Al Shamal Islamic Bank. Along with other senior members of the NIF, he founded Defendant Wadi al Aqiq, a trading company that was allowed by the Sudanese government to engage in unrestricted shipping. Osama bin Laden also founded Taba Investments Ltd., an organization that secured a near monopoly over Sudan's major agricultural exports. Other enterprises begun by Osama bin Laden in Sudan include Ladin International Company and al-Hijra Construction. Gum Arabic Company Ltd. was owned jointly by Osama bin Laden and the Sudanese government. Osama bin Laden had an interest in al Themar, a Sudanese agricultural company, which employed 4,000

employees working its one-million-acre al-Damazine farms. Osama bin Laden also had an interest in the Blessed Fruits Company and al-Ikhlas, both involved in the production of honey, fruits and vegetables.

474. During the early 1990s, while Osama bin Laden was being harbored in Sudan, al Qaeda grew into a sophisticated international terrorist organization. Several key figures in the organization portrayed al Qaeda at the time as a multinational corporation complete with a finance committee, investments and well-organized, concealed accounts and operations worldwide.

475. Osama bin Laden organized al Qaeda into camps dedicated to exportation of terrorism throughout Sudan (and eventually the world); the main Sudanese training site being a 20-acre site near Soba, 10 kilometers south of Khartoum. Osama bin Laden and al Qaeda were sponsored, encouraged and allowed to operate freely in Sudan. Al Qaeda purchased communications equipment, radios, and rifles for the Sudanese NIF, while the Sudanese government in exchange provided 200 passports to al Qaeda so that terrorists could travel internationally with new identities.

476. In or about the early 1990s, Jamal al-Fadl went to Hilat Koko, a suburb of Khartoum, where he met with representatives of al Qaeda and the Sudanese army to discuss the joint manufacture of chemical weapons. Al Qaeda and the Sudanese army cooperated in efforts to mount chemical agents on artillery shells. Al Qaeda at this time also began to experiment with biological warfare – injecting or gassing dogs with cyanide.

477. In Sudan, between the years 1990 and 1993, members of al Qaeda undertook the task of writing the *Encyclopedia of the Afghan Jihad*. Al Qaeda wrote another terrorist work

entitled *Military Studies in the Jihad against the Tyrants*. It was during this period that Osama bin Laden and al Qaeda became fully operational, expanding their terrorist network.

478. At various times between in or about 1992 and 1996, Osama bin Laden and Mamdouh Mahamud Salim worked together with a ranking official in the NIF to obtain communications equipment on behalf of the Sudanese intelligence service.

479. On at least two occasions in the period from in or about 1992 until 1995, members of al Qaeda transported weapons and explosives from Khartoum to the coastal city of Port Sudan for trans-shipment to the Saudi Arabian peninsula, using vehicles associated with Osama bin Laden's businesses.

480. In 1993, al Qaeda paid \$210,000.00 for an airplane in Tucson, Arizona, that was then flown to Khartoum, Sudan. This plane was intended to transport American Stinger Anti-Aircraft missiles from Pakistan to Sudan, although that missile transport did not take place.

481. Osama bin Laden stated publicly that one of his proudest achievements during the period of time al Qaeda was based in Sudan was al Qaeda's role in the 1993 killing of more than a dozen American soldiers stationed in Somalia. Al Qaeda and its allies launched operations in Somalia to foment, foster and participate in, attacks on British and American forces taking part in Operation Restore Hope in Somalia. Al Qaeda grew to export hatred and terror internationally.

482. Because of Sudan's active and material support of Osama bin Laden and al Qaeda, the United States Department of State first put Sudan on the list of State sponsors of terrorism in 1993, largely because of Osama bin Laden's residency and activities.

483. In 1995, Hassan al-Turabi organized an Islamic Peoples Congress where Osama bin Laden was able to meet with militant groups from Pakistan, Algeria and Tunisia, as well as

Palestinian Islamic Jihad and Hamas. During the time that al Qaeda was based in Sudan, it also forged alliances with Egyptian Islamic Groups and other Global Jihad groups in becoming an international sponsor of terrorism.

484. Hassan al-Turabi, under pressure from the United States and others, finally expelled Osama bin Laden from Sudan in 1996, but allowed him to relocate and regroup in Afghanistan.

485. Sudan continues to be one of the governments that the United States has designated as a State sponsor of international terrorism. Sudan serves as a safe-haven for members of al Qaeda, the Lebanese Hezbollah, al-Gama'a al-Islamiyya, Egyptian Islamic Jihad, the Palestine Islamic Jihad, and Hamas. Sudan still has not complied fully with United Nations Security Council Resolutions 1044, 1054, and 1070, passed in 1996 – which require that Sudan end all material support to terrorists. Sudan has assets frozen by the United States government.

486. The Sudanese government and Sudanese officials close to Osama bin Laden co-founded the Al Shamal Islamic Bank and were associated with its operations until at least October, 2001. Among the three founders of the Al Shamal Islamic Bank was the Northern State Government of Sudan, ruled at that time by Mutasin Abdel-Rahim, the personal representative of Hassan al-Turabi, leader and principal Osama bin Laden supporter in the country.

487. In 1988, the provisional Board of Directors of Al Shamal Islamic Bank included Abdel Wahab Osman (Chairman of the Board and Sudanese Minister of Industry at that time, going on to be Sudanese Minister of Finance & National Economy from 1996 to 2000), the Sudanese Government of Northern State, and Izz El-Din El Sayed (Speaker of the Sudanese People's Assembly from 1983 to 1985). Until at least October 2001, Al Shamal Islamic Bank's

shareholders included the National Fund for Social Insurance, a Sudanese National entity listed as representative of the Workers Unions at the National Assembly Committee.

488. Between 1984 and 1991, Osama bin Laden capitalized the Al Shamal Islamic Bank in Sudan. One of Osama bin Laden's former associates testified at the trial on the 1998 African embassy bombings that \$250,000 was wired from Al Shamal Islamic Bank directly into the Osama bin Laden's cohort's Texas bank account – where he used it to buy a plane delivered to Osama bin Laden intended to transport Stinger missiles. The money was wired from the Wadi al Aqiq account at Al Shamal Bank via Bank of New York to a Bank of America account held in Dallas, Texas by Essam al Ridi. Al Ridi, an Egyptian flight instructor who met Osama bin Laden in Pakistan in 1985, flew the plane to Khartoum.

489. Under Sudanese banking regulations, Al Shamal Islamic Bank is considered as a joint ownership commercial bank, and therefore subject to the Central Bank of Sudan review, supervision and control, according to the provisions of the Banks' Practice Act of 1991.

490. Al Qaeda operative Jamal al-Fadl testified that his terrorist activities were greatly aided by Sudanese intelligence and by other Sudanese officials. Al-Fadl said that he helped Osama bin Laden pay the employees of his companies and al Qaeda, whose members received monthly checks of several hundred dollars from Al Shamal Islamic Bank accounts. He also testified that al Qaeda members were granted Sudanese passports and diplomatic privileges by the government. Such material support constitutes the sponsoring of international terrorism.

491. These facts fall under the scope of the 1999 International Convention for the Suppression of the Financing of Terrorism, signed by Sudan on February 29, 2000, and entered in force on April 10, 2002. The Republic of Sudan's course of conduct contradicts the General Assembly Resolution 51/210 of December 17, 1996 calling the States to “prevent and counteract

(...) the financing of terrorists and terrorist organizations, whether such financing is direct or indirect,” the United Nations Security Council Resolution 1373 of September 28, 2001 and the United Nations Security Council Resolution 1269 of October 19, 1999, calling upon all States to “prevent and suppress in their territories through all lawful means the preparation and financing of any acts of terrorism.” These resolutions were adopted under Chapter VII of the United Nations Charter, and are therefore binding on all United Nations member States, including Sudan.

492. Jamal Ahmed Al-Fadl (or “Al-Fadl”), was the first person called in the trial of four men charged with participating in a terrorism conspiracy led by Osama bin Laden, over the 1998 bombings of the American Embassies in Kenya and Tanzania. In February of 2001, Al-Fadl’s testimony described Osama bin Laden’s global banking network, naming institutions in Sudan, Malaysia, The United Kingdom, Hong Kong and Dubai where Osama bin Laden and his international terrorist organization kept money.

493. Al-Fadl also gave a detailed account of Osama bin Laden’s agricultural, construction, transportation and investment companies in Sudan, which are fronts for terrorist activities. Osama bin Laden, his co-conspirators, aiders and abettors, and material sponsors have engaged in a global conspiracy aimed at the United States and other Western targets. Al Qaeda has also acted as a kind of umbrella organization providing support for other terrorist groups.

494. Al-Fadl described al Qaeda and the group’s cooperation with other terrorist organizations like the Iranian-backed Hezbollah.

495. Al-Fadl testified that he helped Osama bin Laden pay the employees of his companies and al Qaeda, whose members received monthly checks of several hundred dollars,

and that he was sent out to buy five farms in Sudan for the group to use as training camps. Al-Fadl testified one farm cost \$250,000 and another \$180,000.

496. After Osama bin Laden moved his group to Sudan in 1991, Al-Fadl testified, its activities were greatly aided by Sudanese intelligence and by other government officials. Al-Fadl described several arms shipments, including al Qaeda's smuggling of Kalishnikov rifles into Egypt from Sudan on two separate occasions that involved about 50 camels each. Al-Fadl also recalled a midnight shipment of four large crates of weapons and explosives to an Islamic group in Yemen, carried on a boat owned by al Qaeda and accomplished with the help of a Sudanese intelligence officer.

497. Al-Fadl testified Osama bin Laden was surrounded by a group of al Qaeda associates who participated on a ruling council and ran various committees on military, business and religious matters.

The Agencies and Instrumentalities of the Republic of Sudan

498. As described above, Sudan acted through its officials, officers, agents, employees and instrumentalities in aiding, abetting, and providing material support and resources to Osama bin Laden, al Qaeda and international terrorism. The support provided by the Republic of Sudan to Osama bin Laden and al Qaeda assisted in, or contributed to, the preparation and execution of plans that culminated in the attacks on September 11, 2001 and to the damages to the Plaintiffs herein.

499. Lieutenant General Omar Hassan Ahmad al-Bashir is the President of Sudan, and is an instrumentality of Sudan for the purposes of liability and damages under the Foreign Sovereign Immunities Act. As head of Sudan, Lieutenant General Omar Hassan Ahmad al-Bashir is responsible for formulating and executing Sudan's policy of supporting terrorism and Osama bin Laden and al Qaeda.

500. The Sudan Ministry of Defense, headed by General Rahman Abdul Siral-Khatim, is an agency of the Republic of Sudan. The Ministry of Defense, as a government agency, aided and abetted Osama bin Laden and al Qaeda as outlined above.

501. The Sudan Ministry of the Interior, headed by Major General Abdul- Rahim Mohammed Hussein, is an agency of Sudan. The Ministry of the Interior, as a government agency, aided and abetted Osama bin Laden and al Qaeda by providing instructors to the training camps run by Osama bin Laden and al Qaeda. In early 1994, Osama bin Laden was responsible for at least three major terrorist training camps in Northern Sudan and the Sudanese Intelligence Services, Al Amn al-Dakhili and Al Amn al-Khariji, provided the training. These services are answerable in part to the Ministry of the Interior.

The Saudi – Spanish – German al Qaeda Scheme

502. Ramzi Binalshibh is an al Qaeda chief operative with ties to al Qaeda cells in Hamburg, Germany, and the Spanish branch of al Qaeda. He is currently in United States custody. The conduct described herein directly links Saudi Arabian entities and individuals to Mohammed Atta's Hamburg al Qaeda cell, and shows a proximate cause between Saudi Arabian individual's and entities' conduct and the funding of the terrorist attacks of September 11, 2001.

503. These entities and individuals include but are not limited to Proyectos y Promociones Iso, Afamia SL, Cobis, Abrash Company, Promociones y Construcciones Tetuan Pricote S.A., Contratas Gioma, Eurocovia Obras SA, Mushayt for Trading Establishment, Mohammed Ali Sayeed Mushayt, Proyectos y Promociones Paradise SL, Proyectos Edispan, Ghasoub al Abrash Ghalyoun, and Muhammed Galeb Kalaje Zouaydi.

504. On April 23, 2002, the Spanish Central Unit for Foreign Information (“Unidad Central de Informacion Exterior”) provided information to the investigating magistrate Baltazar

Garzon Real in order to prosecute the Spanish branch of al Qaeda. This Spanish al Qaeda branch turned out to be a key structure in the financing of the September 11, 2001 attacks.

505. Several members of al Qaeda were arrested in Spain in April 2002: Imad Eddin Barakat Yarkas, Muhammed Galeb Kalaje Zouaydi (a/k/a Abu Talha), Abdalrahman Alarnaot Abu Aljer (a/k/a Abu Obed), Mohammad Khair Al Saqqa (a/k/a Abu Al Darda), and Ghasoub Al Abrash Ghalyoun (a/k/a Abu Musab). Ghasoub Al Abrash Ghalyoun is considered a senior financier of al Qaeda in Europe, as is Zouaydi.

506. Abu Dahdah is a member of a Spanish cell and part of al Qaeda that is active through several economic entities. This organization's conspiracy and scheme is considered as a critical logistical component leading to September 11, 2001 attacks. Mohamed Atta had been in relation with several members of Abu Dhadah's terrorist cell in Spain, in order to arrange the details of the September 11, 2001 operations. In addition to these illegal activities in providing financial assistance to al Qaeda, additional businesses have supported terrorist operations.

507. Muhammed Galeb Kalaje Zouaydi (a/k/a Muhammad Ghalim Kalaji, a/k/a Abu Talha, a/k/a Abu Musab) (or "Zouaydi") was born in Syria on January 3, 1961. Zouaydi is the brother-in-law of Mohamed Bahaiah (a/k/a Abu Khaled), messenger and courier for al Qaeda in Europe.

508. In 1978, Zouaydi graduated in mechanical engineering from the Aleppo University and attended another academic year until 1980. In 1984, Zouaydi was of Spanish nationality, but resided in Saudi Arabia.

509. In 1985, Zouaydi formed Mushayt for Trading Establishment in Jeddah, Saudi Arabia, as a household gifts company, and owned it at least until the end of 1998. The company

was controlled at all times relevant by members of the Muslim Brotherhood, including current General Manager, Walid Al Zaim.

510. In or about 1996, Zouaydi met Bassam Dalati Satut, Imad Eddin Barakat Yarkas and Ghasoub El Abrash Ghalyoun in Spain and Saudi Arabia. He also met Mamoun Darkazanli, an al Qaeda terrorist and co-conspirator, in Saudi Arabia. During his stay in Saudi Arabia, Zouaydi was in frequent contact with members of the Muslim Brotherhood, Saudi and Syrian businessmen, and several Saudi scholars and religious leaders. Zouaydi attended meetings and had contacts with representatives of extremist organizations linked to Osama bin Laden, including those in the Philippines.

511. In December 1998, Zouaydi settled in Spain and created several businesses with individuals who are part of an al Qaeda cell in Spain. Between 1999 and 2001, Zouaydi frequently traveled to Saudi Arabia, Turkey, and in at least one instance to the United States.

512. From 1996 to 2001, the al Qaeda network in Europe received at least \$1,093,197 dollars from Zouaydi's Saudi company "donations" and false contracts issued by Spanish companies owned by Zouaydi. These front companies, mainly involved in construction and real estate, were convicted in arms trafficking, credit card fraud and false documentation. They made false financial statements and laundered at least \$2.5 million dollars over five years.

513. Since 1999, money was funneled to the Hamburg al Qaeda cell through businessmen Mahmoud Darkazanli and Mohammed Haydar Zammar who provided this cell of hijackers with financial, logistical and material support.

514. The financial and support network formed by Zouaydi in Spain engaged in relations with other al Qaeda cells in Belgium, Italy, Germany, the Philippines and Indonesia in furtherance of a common scheme, plan, course or pattern of conduct, criminal and civil

conspiracy, and racketeering enterprise to aid, abet, or otherwise materially sponsor and promote acts of international terrorism.

515. Muhammed Galeb Kalaje Zouaydi is considered by Spanish government as the main benefactor of al Qaeda in Europe in preparation of the September 11, 2001 attacks. Between 1995 to 2000, Muhammed Galeb Kalaje Zouaydi received large amount of money from Saudi Arabia, in order to conduct investments, and provide logistical assistance and support to al Qaeda.

516. Muhammed Galeb Kalaje Zouaydi (or “Zouaydi”) resided between Saudi Arabia and Spain, when he created with Ghasoub Al Abrash Ghalyoun, a money laundering scheme to assist al Qaeda operations. Zouaydi has close financial ties with Defendants Prince Turki al Faisal al Saud and Prince Mohammed al Faisal al Saud.

517. Zouaydi organized Spanish and Saudi Arabian businesses with Ghasoub Al Abrash Galyoun. These companies included the real estate company Promociones y Construcciones Tetuan Pricote S.A., located in Madrid. This company is related to Abrash Company, located at the same address, and to Contratas Gioma S.A., also chaired by Ghasoub Al Abrash Galyoun. Several other companies are located at the same address and purport to be involved in industrial building construction. Those entities are related to the operations of September 11, 2001 attacks and furnished logistical and material support to the al Qaeda Spanish branch.

518. All the companies located at the 33 Ana Maria Street in Madrid, and owned by Ghasoub Al Abrash Galyoun, received millions of dollars from Muhammed Galeb Kalaje Zouaydi. The financing used for the functioning of those companies was provided to Zouaydi from Saudi Arabia.

519. To attempt to legitimize as well as cover-up this sponsorship of al Qaeda and international terrorism, false contracts were signed with Zouaydi's Saudi Company, Mushayt for Trading Establishment. Mushayt for Trading Establishment is a company chaired by Mohamed Ali Mushayt was founded by Muhammed Galeb Kalaje Zouaydi in order to transfer funds for al Qaeda operations in Europe.

520. In addition, Mushayt for Trading Establishment in Jeddah, Saudi Arabia, sheltered and materially and economically supported Nabil Nanakli Kosaibati Nabil, who was convicted for terrorist activities in Yemen. Each month, the Mushayt for Trading Establishment payed wages to Nabil Nanakli Kosaibati Nabil. Mushayt for Trading Establishment in Jeddah shares the same administrative infrastructure, phones, telexes, with a company named Mohammed Ali Sayeed Mushayt, chaired by Abdull Aziz Bin Abdullah, and also located in Jeddah. Those two companies operated money transfers to develop Spanish companies as fronts for the financing of international terrorism generally and al Qaeda specifically.

521. Mushayt for Trading Establishment materially and financially supported Mohamed Atta's al Qaeda cell and settlement in Hamburg, Germany. Abdul Fattah Zammar and Mamoun Darkanzali (a/k/a Abu Ilias) provided Atta with material and financial support to organize the September 11, 2001 attacks.

522. Muhammed Galeb Kalaje Zouaydi sent \$227,000 dollars to Nabil Sayadi in Belgium through Mushayt for Trading Establishment. Nabil Sayadi is also a radical Muslim extremist in charge of the Fondation Secours Mondial and Defendant Global Relief Foundation in Belgium.

523. From 1996 to 2001, estimates of amounts personally donated by Muhammed Galeb Kalaje Zouaydi to al Qaeda logistics in the Europe are \$656,022 dollars. Abdalrahman

Alarnaot Abu Aljer, leader of the al Qaeda Spanish cell, invested \$53,000 dollars in the Zouaydi's company Proyectos y Promociones Iso, registered in Madrid by Bassam Dalati Satut.

524. Proyectos y Promociones Iso was an umbrella organization for al Qaeda operations in Europe. The "contracts" signed with Mushayt for Trading Establishment and Muhammed Galeb Kalaje Zouaydi were part of a money laundering scheme to mutually support, aid and abet al Qaeda and international terrorism. The total revenue of the company Proyectos y Promociones Iso for the year 2000 equalled \$2,549,175 dollars.

525. The company Proyectos y Promociones Iso, registered in Spain, was also used to launder invoices and bills of other members of al Qaeda in Europe.

526. Bassam Dalati Satut belongs to the Spanish al Qaeda cell headed by Abu Dahdah. Bassam Dalati Satut is also the manager of a company registered as Cobis, located in Madrid. This company materially supported, aided and abetted al Qaeda operations and propaganda.

527. Kamal Hadid Chaar participated in the material sponsorship and aiding and abetting of al Qaeda through his company Afamia S.L., also located in Madrid. Kamal Hadid Chaar is a Muslim activist, involved in extremist Islamic publications and in al Qaeda activities in Spain. Abdalrahman Alarnaot is also involved in Afamia S.L., as director. Kamal Hadid Chaar is the Chief Executive Officer of Afaimia S.L. Kamal Hadid Chaar facilitated and sponsored the passage of Chej Salah to Peshawar with a false passport registered as Kamal Hadid Chaar.

528. On July 16, 1996, Mohamed Neel Acaid, a member of the al Qaeda cell in Spain, sent through the Arab Bank the sum of \$6,400 dollars to Khalid Ahman Hamdan Alriqib, an extremist associated with Chej Salah in Spain.

529. All of these companies, entities, and individuals participated in the sponsorship of terror and in the preparation of September 11, 2001 attacks. They did so with the cooperation of al Qaeda headquarters in Spain, particularly Chej Salah, founder of the Spanish cell and close to Osama bin Laden.

530. From at least 1995 to 2000, Ghasoub Al Abrash Ghalyoun was actively associated with Muhammed Galeb Kalaja Zouaydi in the financing and material support of al Qaeda and the September 11, 2001 attacks.

531. The September 11, 2001 attacks were financially and logistically assisted by this European money laundering scheme directed from Saudi Arabia with an epicentre based in Spain. The scheme resulted in the direct, material support of the Hamburg cell of al Qaeda hijackers, including Mohamed Atta and Ramzi Binalshibh.

532. Through several front companies that served as covers for al Qaeda operations established in Madrid, Spain, al Qaeda sponsors were able to funnel millions of dollars from companies and individuals based in Saudi Arabia to Spain, Germany and other European al Qaeda cells, between 1995 and 2001.

533. While the organizations and companies were supposedly involved in construction and real estate, they were indicted for arms trafficking, credit card fraud and false documentation. This terrorist funding scheme was directed by Defendants Mohammed Galeb Kalaje Zouaydi, Bassam Dalati Satut, Ghassoub Al Abrash Ghalyoun and Imad Eddin Barakat Yarkas. This scheme was carried out in Saudi Arabia, Spain, Germany, and elsewhere. It is anticipated that additional parties and persons will be implicated by the evidence being analysed regarding this scheme.

534. Funds for terrorism were funnelled to the Hamburg al Qaeda cell by and through businessmen Mahmoud Darkazanli and Mohammed Haydar Zammar, who both provided the al Qaeda cell of hijackers with financial and logistical support needed to carry out the gruesome attacks of September 11, 2001.

535. Mustaf Ahmed al-Hisawi (a/k/a Sheikh Saeed) is a Saudi Arabian businessman who facilitated the financial transactions to the terrorists and the al Qaeda cells that committed and planned the atrocities of September 11, 2001. This Defendant is known as one of Osama bin Laden's financial chiefs.

536. Abdullah bin Abdul Muhsen al Turki (or "al Turki") is a former Saudi, advisor to King Fahd, and Secretary General of the Muslim World League. Additional specific allegations regarding al Turki's role in the Saudi-Spanish-German al Qaeda scheme are detailed *supra*.

537. On October 10, 1999, Zouaydi, a senior al Qaeda financier for Europe, and Abdullah bin Abdul Muhsen al Turki, then advisor to King Fahd, agreed to participate as business partners to a construction project in Madrid, Spain. A contract was written by Zouaydi Company in Spain stating that both parties will finance the project.

538. Zouaydi was part of an international terrorist movement for global jihad which encompassed the al Qaeda network. This network channeled money directly to the perpetrators of September 11, 2001, and to similar global jihad movements planning terrorist actions in San Francisco, Bali, and elsewhere.

539. Several faxes were sent by Zouaydi to al Turki. In one fax sent on October 15, 1999, Zouaydi asks al Turki to send the money through al Rajhi Bank (which hold his accounts in Saudi Arabia).

540. As a guaranty for the operation, Zouaydi sent a check of 191 million Pesetas on September 15, 1999, to al Turki as beneficiary from Banco Sabadell in Madrid. On October 22, 1999, a fax was sent to al Turki by Prol & Asociados law firm in Madrid referring to a telephone conversation with someone acting on behalf of al Turki, Waleed O Houssainy, about a project of al Turki to buy 100% of Zouaydi's Spanish company.

541. On February 4, 2000, Zouaydi sent a fax in furtherance of this scheme to al Turki, referring to him as advisor to King Fahd.

542. The Spanish scheme provided material support directly to al Qaeda operatives and the September 11, 2001 attacks. As investigations continue, additional evidence of such schemes will be uncovered.

Abu Qatada al-Filistini

543. Abu Qatada al-Filistini (a/k/a Abu Ismail, a/k/a Abu Umar, a/k/a Abu Omar Omar, a/k/a Abu Umr Takfiri, a/k/a Abu Umar Umar, a/k/a Ali-Samman Uthman, a/k/a Omar Mahmoud Uthman, a/k/a Umar Uthman) (or "Abu Qatada,") was born 1960 in the city of Nablus in the Palestinian Territories. Abu Qatada entered high school in Amman and eventually obtained a degree in religious studies. Abu Qatada was one of the first Jordanians to join in the war against the Soviet Union. In Peshawar, Pakistan, Abu Qatada became a disciple of Abdullah Azzam, Osama bin Laden's spiritual mentor and founder of the organization that preceded al Qaeda. Following Azzam's assassination in 1989, Abu Qatada joined the jihad against the Soviet Union in Jalalabad, Afghanistan. In 1993 he immigrated to the United Kingdom where he received political refugee status. From 1994 to 1997, Abu Qatada was considered one of the ideological leaders of the Algerian-based international terrorist group, the Armed Islamic Group (or "GIA"). In 1998, Abu Qatada supported a branch of the GIA, the Salafist Group for Preaching and Combat headed by Hassan Hattlab.

544. Abu Qatada is a senior agent for Osama bin Laden in Europe. On October 12, 2001, Abu Qatada was designated as financial supporter of terrorism by President George W. Bush. Along with the designation was a call for the freezing of Abu Qatada's assets. At the Department of Treasury news conference that announced the designation of Abu Qatada as a financier of terrorism, Treasury Secretary Paul O'Neill stated:

The list includes businesses and charitable organizations that funnel money to the al Qaeda terrorist network.

545. On the day of Abu Qatada's designation, October 12, 2001, the Department of Treasury issued a press release that describes Abu Qatada's role in al Qaeda, using his a/k/a Oman Mahmoud Uthman, which stated in part "Uthman is a senior agent for bin Laden in Europe."

546. Following his designation as a financier of terrorism by the United States, the United Kingdom froze \$260,000 of Abu Qatada's assets. Government officials from France, Germany, Italy, Spain and Jordan have stated that Abu Qatada was in close contact with al Qaeda agents that were planning international terrorist attacks.

547. During the 1998 United States Embassy bombings in Africa trial, Abu Qatada was identified as a member of al Qaeda's religious council, known as the Fatwa Committee, that issues religiously acceptable rulings, or fatwas. On February 6, 2001, the key government witness and al Qaeda member, Jamal Ahmed al-Fadl, testified that al Qaeda maintained a Fatwa Committee and that Abu Qatada was a member of the committee:

Q. We will come back to the businesses. Besides the business committee what other businesses were there within al Qaeda?

A. Fatwah committee and Islamic study.

Q. The fatwah and Islamic study committee. Can you tell us who was on the fatwah committee.

...

Q. Did you ever attend meetings where member so the fatwah committee spoke about the fatwas issued by al Qaeda?

A. Yes.

Q. Were the members of the fatwah committee identified by the members of al Qaeda?

A. Yes.

Q. Can you tell to the jury who the member of the fatwah committee were?

...

Q. Tell us who else was on the fatwah committee.

A. Abu Faraj and Abu Qutada and Abu Ibrahim al Iraqi Hajer, Dr. Fadhl el Masry, and Dr. Abdel Omez.

548. Abu Qatada is still fulfilling the role of al Qaeda's Fatwa Committee by justifying the September 11, 2001 attacks. Abu Qatada wrote a ten page document that glorified Osama bin Laden and detailed the "moral" justification for the attacks of September 11, 2001. Distributed widely on emails and posted on a number of extremist websites in October 2002, Abu Qatada's document is titled, "The Legal Vision for the September 11 Events."

549. Abu Qatada was convicted twice by Jordan for his involvement in terrorism. In April 1999, Abu Qatada was sentenced to life imprisonment by a Jordanian military court. In March 2000, Jordan once again tried and convicted Abu Qatada for his role in aiding terrorism. This time, however, he was involved with a group of individuals identified by Jordan as members of al Qaeda. Abu Qatada was sentenced to death in absentia, along with the twenty-eight other accomplices. The charges levied against him were for planning terrorist activities on behalf of al Qaeda. More specifically, he was indicted on account of a) plotting terrorist actions; and b) memberships in an unauthorized group. The terrorist operations were directed against tourist attractions and American interests in Jordan and were timed to coincide with the Millennium. Abu Qatada is an aider, abettor, co-conspirator, and/or material supporter of international terrorism, al Qaeda and Osama bin Laden. Abu Qatada was arrested on October 24, 2002, by British authorities during an armed raid on his residence.

Mohammed Hussein al-Amoudi

550. Mohammed Hussein Al-Amoudi (“Al-Amoudi”) is a partner of Defendant Khalid bin Mahfouz in a number of businesses. Al-Amoudi is partner of bin Mahfouz in the oil business through Nimir Petroleum and Delta Oil. Al-Amoudi is a Saudi-Ethiopian.

551. Al-Amoudi was a Director of the al-Haramain branch in Kenya. The al-Haramain Islamic Foundation is a Saudi Islamic charity that has exploited its non-profit status for the benefit of Osama bin Laden and the terrorist network al Qaeda as described in detail *supra*. Two of these branches, Bosnia and Somalia, have already been designated by the United States government as terrorist entities and their assets have been frozen. The leaders of al-Haramain have direct links to al Qaeda and international terrorism.

552. The al-Haramain Islamic Foundation was banned in Kenya, along with five other NGOs, following the 1998 Embassy bombings. Osama bin Laden and al Qaeda were convicted by the United States in 2001 for plotting and executing these dual attacks in Kenya, and Tanzania, which killed 224 people, and injured more than 4,000.

553. Al-Amoudi is an aider, abettor, co-conspirator, and/or material sponsor of international terrorism, al Qaeda, and Osama bin Laden.

Yassir al-Sirri

554. Yassir al-Sirri (a/k/a Abu Ammar) (or “al-Sirri”) was born in Egypt in 1963 and joined the radical Islamic movements emanating from the region. As a teenager, he was frequently arrested by Egyptian authorities and was refused entry into the Egyptian army for security reasons. He went to Yemen in 1988.

555. After being tried in absentia for the attempted assassination of Prime Minister Atef Sedki in 1993, al-Sirri was sentenced to death in Egypt. Al-Sirri fled from the Sudan, where he was currently residing, to the United Kingdom and requested political asylum. There

he established the radical Islamic Observation Center, which releases al Qaeda messages and reports about its members.

556. After September 11, 2001, Yassir al-Sirri was again arrested in the United Kingdom for his alleged participation in the assassination of Ahmed Shah Masood, the Afghan warlord who led the North Alliance against the Taliban. He was later released, unconvicted. The United States has requested extradition of Yassir al-Sirri for his role in providing material support to Gama'a al-Islamiyya, Omar Abdel Rahman's jihadist organization that is part of the al Qaeda network.

557. In April of 2002, al-Sirri was indicted and charged with providing material support to Gama'a al-Islamiyya (IG), a designated terrorist group with numerous ties to al Qaeda.

558. Yassir al-Sirri solicited, commanded, induced and otherwise endeavored to persuade other persons to engage in violent terrorist operations worldwide.

559. In December 2000, al-Sirri arranged for money to be sent to Omar Abdel Rahman's son, Ahmed Abdel Rahman. The younger Rahman was in Afghanistan with al Qaeda when he relayed the request for the money. The criminal indictment explains:

In or about December 2000, SATTAR spoke with one of Sheikh Abdel Rahman's sons, Ahmed Abdel Rahman, a/k/a "Sayfallah," who is a co-conspirator not named as a Defendant herein, and was in Afghanistan with al Qaeda, regarding the need for SATTAR to transfer money to him.

On or about May 6, 2001, SATTAR spoke by telephone with AL-SIRRI and agreed that, because SATTAR could not send the money to Ahmed Abdel Rahman directly in Afghanistan, AL-SIRRI would arrange for an individual to transport the money to Ahmed Abdel Rahman.

On or about May 8, 2001 SATTAR spoke with AL-SIRRI to finalize the money transfer to Ahmed Abdel Rahman through the director of a boys' school in Afghanistan.

On or about May 14, 2001, SATTAR spoke by telephone with Ahmed

Abdel Rahman who told SATTAR that there had been some confusion and that Mohammed Abdel Rahman had received the money sent by SATTAR.

560. The United States extradition warrant alleges that al-Sirri “sent money to Afghanistan in May 2001, ‘knowing or having reasonable cause to suspect that the money would or may be used for the purpose of terrorism within the jurisdiction of the government of the U.S.A.’”

**The Advice and Reformation Committee (ARC) and
The Committee for the Defense of Legitimate Rights (CDLR)**

561. The Advice and Reformation Committee (or “ARC”) and the Committee for the Defense of Legitimate Rights (or “CDLR”) are both Saudi-dissident groups with ties to Osama bin Laden. Both organizations seek to overthrow the Saudi government to replace the regime with an even more strict brand of Islam. The ARC in London was headed by Khalid al-Fawwaz (or “al-Fawwaz”), and the CDLR in London is headed by Mohammed al-Massari. The ARC branch in the United States was set up by al-Massari’s wife, Lujain al-Iman, providing a link between ARC and CDLR.

562. These two organizations have disseminated al Qaeda and Osama bin Laden’s propaganda throughout their existence and served to further the violent goals of radicals and terrorists against the United States. Al-Fawwaz has been indicted in the U.S., and the United States has requested his extradition for his prominent role in setting up the al Qaeda infrastructure that allowed the embassy bombings in East Africa to occur in 1998. Two al Qaeda operatives, Ziyad Khaleel and Tarik Hamdi, have been involved with both the CDLR and the ARC.

563. Al-Massari, along with his wife al-Iman, also headed the now-dissolved Action Committee for the Rights of Middle East Minorities, located in Denver, Colorado.

564. The ARC was established in 1994 at the behest of Osama bin Laden. The then Arab student named Khalid al-Fawwaz was chosen to run the center, ostensibly for the peaceful reform of Saudi Arabia, according to its constitution. In reality, though, ARC served as al Qaeda's base in The United Kingdom, plotting and promoting international terrorism. The indictment of al-Fawwaz and Osama bin Laden and the others involved in the Embassy bombings plot describes:

In or about 1994, the Defendant USAMA BIN LADEN, working together with KHALID AL FAWWAZ, a/k/a "Khaled Abdul Rahman Hamad al Fawwaz," a/k/a "Abu Omar," a/k/a "Hamad," set up a media information office in London, England (hereafter the "London office"), which was designed both to publicize the statements of USAMA BIN LADEN and to provide a cover for activity in support of al Qaeda's "military" activities, including the recruitment of military trainees, the disbursement of funds and the procurement of necessary equipment (including satellite telephones) and necessary services. In addition, the London office served as a conduit for messages, including reports on military and security matters from various al Qaeda cells, including the Kenyan cell, to al Qaeda's headquarters.

565. Al-Fawwaz employed Ziyad Khaleel, a student in Columbia, Missouri, whom the FBI described as a "procurement agent" for bin Laden, and whose job was to "procure computers, satellite telephones and covert surveillance equipment," according to an FBI memo, for al Qaeda.

566. In 1996, al-Fawwaz tasked Ziyad Khaleel with purchasing a satellite phone needed for al Qaeda's communication network. That phone became instrumental in the Embassy bombings and was used by Osama bin Laden himself to dictate orders and relay information.

567. As Assistant United States Attorney stated during the Embassy bombings trial:

It is the phone that is used by the headquarters people in Afghanistan . . . And who they call on that phone and who has that number tells you a great, great deal about the activities of the people in this case.

568. The prosecutors of the case maintained that Khaleel sent the phone to al-Fawwaz, who then sent it to Afghanistan. By 1998, the phone had been used for hundreds of calls, and the number for the phone appeared in the personal phone directories of terrorists in Egypt and Kenya.

569. Also by 1998, Khaleel had ordered more than 2,000 minutes of phone time for the phone, and then would in turn be reimbursed by al-Fawwaz directly.

570. The indictment additionally explains the role of the satellite phone:

From at least as early as 1995 until September 1998, the Defendant KHALID AL FAWWAZ provided the Defendant USAMA BIN LADEN, as well as other al Qaeda members, with various means of communications, including a satellite telephone ("Bin Laden Satellite Telephone"), for the purpose of facilitating communications between al Qaeda members and associates.

571. Phone records show that the highest ranking al Qaeda members in Kenya in 1998 placed calls to Saudi Arabia and other gulf states in furtherance of their terrorist enterprise.

572. Wadih el-Hage made phone calls on behalf of Osama bin Laden and al Qaeda in furtherance of their international terrorist enterprise and scheme. Similarly, the use of wire transfers by al Qaeda operatives and supporters was and is done in violation of RICO.

573. Khalid al-Fawwaz is a top al Qaeda member, also indicted for his role in the 1998 Embassies bombings in the same indictment as Osama bin Laden. Khalid al-Fawwaz helped establish the infrastructure and support system that aided al Qaeda to carry out the attacks. Numerous phone calls from Africa to Saudi Arabia and other gulf states were made on his mobile phone in furtherance of this scheme.

574. The United States subsequently indicted al-Fawwaz for his role in the bombing and currently awaits extradition to the United States, while remaining imprisoned in The United

Kingdom. Ziyad Khaleel left the country and probably resides currently in Saudi Arabia, although his whereabouts are unknown.

575. Al-Fawwaz aided in the creation of Bin Laden's famous 1996 Declaration of War Against the West. He then vouched for its authenticity and released it to the media, through the Committee for the Defense of Legitimate Rights. The indictment explains:

On or about July 31, 1996, the Defendant KHALID AL FAWWAZ created, using a computer in his residence in London, England, a file entitled "the Message"

On or about August 23, 1996, a Declaration of Jihad indicating that it was from the Hindu Kush mountains in Afghanistan entitled "Message from Usamah Bin-Muhammad Bin-Laden to His Muslim Brothers in the Whole World and Especially in the Arabian Peninsula: Declaration of Jihad Against the Americans Occupying the Land of the Two Holy Mosques; Expel the Heretics from the Arabian Peninsula" (hereafter the "Declaration of Jihad") was disseminated;

In or about August and September 1996, the Defendant KHALID AL FAWWAZ maintained in a computer in his residence computer file copies of the "Message from Usamah Bin-Muhammad Bin-Laden to His Muslim Brothers in the Whole World and Especially in the Arabian Peninsula: Declaration of Jihad Against the Americans Occupying the Land of the Two Holy Mosques; Expel the Heretics from the Arabian Peninsula";

In or about August or September 1996, the Defendant KHALID AL FAWWAZ forwarded a copy of USAMA BIN LADEN's Declaration of Jihad to another person in England for further dissemination to the media for publication and thereafter KHALID AL FAWWAZ vouched for the Declaration's authenticity.

576. Wadih el-Hage visited al-Fawwaz and admitted that al-Fawwaz also worked for Osama bin Laden. Wadih el-Hage, while testifying in front of a grand jury, noted that Fawwaz worked for bin Laden:

Q. Do you know Khalid Al Fawwaz?

A. Yes.

Q. Is he in London?

A. Yes.

Q. Does he work for Usama Bin Laden?

A. Yes.

Q. How long do you know Khalid Al Fawwaz?

A. Since '95 when I visited London.

577. The ARC Branch in the United States facilitated communication with Osama bin Laden and al Qaeda. The ARC branch in the United States had its address in Denver, Colorado. The post office box was registered by Lujain al-Iman, the wife of CDLR's Mohammed al-Massari. In 1994, al-Massari asked al-Iman to set up an MCI 800 number in Denver for the ARC to allow the organization to communicate between Saudi Arabia and The United Kingdom without getting caught by Saudi authorities, according to al-Massari.

578. After the phone system was set up, Osama bin Laden called al-Massari personally to thank him, according to al-Massari. Al-Iman said that she knew that al-Fawwaz, the head of ARC, worked for Osama bin Laden, when she set up the phone line, but thought that al-Fawwaz was just "a human rights activist."

579. This address was also shared by the International African Relief Agency (or "IARA") and Ziyad Khaleel, who as explained *supra*, was a student in Columbia, Missouri, whom the FBI described as a "procurement agent" for Osama bin Laden, and whose job was to "procure computers, satellite telephones and covert surveillance equipment" for al Qaeda.

580. CDLR's United States Branch is registered to a known al Qaeda operative. In the radical Arabic publication, *Al-Zaytuna*, an advertisement for CDLR listed in its contact information a telephone number that is registered in Tarik Hamdi's name. Tarik Hamdi has specific ties to Osama bin Laden and al Qaeda.

581. Well after Osama bin Laden had openly declared war against Americans in 1996, Tarik Hamdi purchased and arranged for the delivery of a battery for the satellite phone that Ziyad Khaleel purchased and that Osama bin Laden used to coordinate international terrorism

attacks. Hamdi also arranged for an interview that ABC News had with Osama bin Laden in 1998, the apparent cover for his involvement in procuring the battery for the satellite phone. Tarik Hamdi wrote a note to Khalid al-Fawwaz, calling him "Brother Khalid," indicating a more than professional relationship. Assistant United States Attorney Kenneth Karas, in the government's closing statements in the embassy bombings trial, described the whole process of obtaining the satellite phone for the use of al Qaeda and both Ziyad Khaleel and Tarik Hamdi's involvement:

How else do you know that this is the phone that is used by Bin Laden and others in Afghanistan? Well, at some point in 1998 Ziyad Khalil puts a purchase order in for a battery pack to Ogara.

This is an invoice from Ogara, and you see on the top left there, "Customer: Ziyad Khalil," and you see that what he is purchasing is the ultra light power supply and the 12VDC mini battery charger. Only Ziyad Khalil does not have it sent to him, he asked, ship to, Tariq Hamdi in Herndon, Virginia.

The battery pack goes from Ziyad Khalil requesting it to shipping it to Tariq Hamdi, to Tariq Hamdi going to Pakistan, and then Afghanistan, where he delivers the battery pack for the phone.

And the intermediary in all of this is Khalid al Fawwaz, because he's the guy whose paying Ziyad Khalil for the minutes and he's the guy who arranges for the interview with ABC News and he is the guy getting the message from Tariq Hamdi, the person who delivers the packet.

582. Tarik Hamdi knew both Ziyad Khaleel and al-Fawwaz, and knew them intimately enough that they trusted him to both obtain materials for them as well as arrange an interview with Osama bin Laden.

583. Tarik Hamdi also worked at International Institute of Islamic Thought (or "IIIT"), located at 555 Grove Street, Herndon, Virginia, the central address surrounding the SAAR Foundation raids, evidence and investigation.

584. The CDLR posted Osama bin Laden's Declaration of War on October 12, 1996. CDLR used the email address 100043.1420@CompuServe.com to post Osama bin Laden's Declaration of War against the West on the Muslim Students' Association's listserve, the "MSA News."

585. The preamble to this posting by CDLR indicates an intense hatred for the West and full support for Osama bin Laden as follows:

Find below the first part of a very accurate translation of the "DECLARATION OF WAR" issued by the Mujahid Brother Sheikh Usama Bin Muhammad Bin Ladin concerning the illegitimate presence of the American occupation forces in the Arab Peninsula (The Land of the two holy sanctuaries).

I believe it is a significant historic document and that you have the right to read, analyse and think about it. I still believe that the Kufr regime of the British and later American agents and puppets, Aal Saud, is the source of the current evil of the occupation. On the other hand Aal Saud and the American occupation have become so intertwined and interconnected as to make it impossible to separate them. They have become one ORGANICALLY connected evil!!

Read and get ready for JIHAAD!!

The CDLR, the ARC, their officers, agents, employees, and co-conspirators are aiders and abettors engaged in the material sponsorship of al Qaeda, Osama bin Laden and international terrorism.

Islamic Cultural Center of Milan/Islamic Cultural Center of Geneva

586. According to the Italian investigation of several al Qaeda terrorists arrested in Milan in relation with al Qaeda operations in Europe, the Islamic Cultural Center of Milan (a/k/a Centro Cultural Islamico de Milano, a/k/a Islamic Cultural Institute of Milan, a/k/a Istituto Culturale Islamico de Milano) (or "ICCM") was extensively used as a cover for terrorist planning, recruiting sponsorship and operations.

587. The principal suspect arrested in Italy, Essi Sami Ben Khemais, regularly met other suspects at the Islamic Cultural Center of Milan, and used its address to communicate with other members of al Qaeda European cells.

588. The Islamic Cultural Center of Milan, Milan, Italy, is presided by Abdel Hamid Shaari. The Center is considered by the United States Treasury Department as “the main al Qaeda station house in Europe,” utilized to “facilitate the movement of weapons, men and money around the world.”

589. The Islamic Cultural Center of Milan creation in 1988 was financed by Ahmed Idris Nasreddin, founder and member of the board of Bank al-Taqwa. According to the Italian investigation, Bank al-Taqwa was until recently paying the annual rent of the Islamic Cultural Center in Milan of Twenty-Five Thousand (\$25,000.00) Dollars.

590. Relations between the Islamic Cultural Center in Milan and Bank al-Taqwa also include Sante Abdulawahab Ciccarello, a board member of ICCM that co-founded the branch of Bank al-Taqwa in Bahamas.

591. According to Swiss prosecutors, Bank al-Taqwa in Switzerland (change in name to Nada Management Organization SA, Lugano, Switzerland), “comprises the most important financial structure of the Muslim Brotherhood and Islamic terrorist organizations.” Its founder, Youssef Nada, is a known international terrorist.

592. Another director of Bank al-Taqwa, Ahmed Huber, was associated with the Islamic Center of Geneva, Switzerland, just across the border where he was converted to Islam. Ahmed Huber acknowledged publicly that he met with members of Osama bin Laden terrorist network in Lebanon.

593. The principal financial support of the Islamic Center of Geneva is provided by Defendant Dar Al Maal Al Islami (or “DMI”), controlled by Prince Mohammed al Faisal al Saud.

594. The Islamic Center of Geneva was established in 1961 by Said Ramadan, son-in-law of Hassan al-Banna. Hassan al-Banna was a founder of the Egyptian Muslim Brotherhood, and co-founder of Defendant Muslim World League in Saudi Arabia in 1962 while he was serving as advisor to King Saud. Hassan al-Banna was also a co-founder of the Bank al-Taqwa branch in Bahamas. After his death in 1995, his son Hani Ramadan became President of the Islamic Center of Geneva.

595. Hani Ramadan wrote an article defending stoning of women and various corporal sanctions under the guise Islamic law along with even more outrageous statements of violence and hatred. His license as scholar in Switzerland was suspended soon after. Founders of the Islamic Center of Geneva also included Abu al-Hassan Ali al-Nadawi (also a co-founder of Defendant Muslim World League with Said Ramadan).

596. Another founder of the Islamic Center of Geneva, Muhammad Hamidullah, wrote:

A struggle cannot be anything except a holy act. All war is forbidden in Islam, if it is not waged for a just cause, ordained by Divine law. The life of the Prophet (Muhammad) provides reference to only three kinds of wars: defensive, punitive, and preventive..... To establish liberty of conscience in the world was the aim and object of the struggle of the Prophet Muhammad and who may have a greater authority in Islam than he? This is the ‘holy war’ of the Muslims, the one which is undertaken not for the purpose of exploitation, but in a spirit of sacrifice, its sole objective being to make the Word of God prevail. All else is illegal. There is absolutely no question of waging war for compelling people to embrace Islam; that would be unholy war.

597. Youssef Nada was previously designated by the United States on November 7, 2001, and by the United Nations on November 9, 2001. Ahmed Idris Nasreddin was designated by the G7 on April 19, 2002, and by the United Nations on April 24, 2002. On August 29, 2002, the United States designated several additional entities controlled by Youssef Nada and Ahmed Idris Nasreddin stating that “through commercial holdings, [they] operate an extensive financial network providing support for terrorist related activities.”

598. Bank al-Taqwa was designated as a terrorist entity by the United States on November 7, 2001, and the United Nations on November 9, 2001. The United States Treasury Department stated that “Bank al-Taqwa, for which Nasreddin is a director, was established in 1988 with significant backing from the Muslim Brotherhood. They have been involved in financing radical groups such as the Palestinian Hamas, Algeria's Islamic Salvation Front and Armed Islamic Group, Tunisia's An-Nahda, and Usama bin Laden and his Al Qaida organization.”

599. The Treasury Department reported that Bank al-Taqwa appeared to be providing a clandestine line of credit to a close associate of Osama bin Laden as of late September, 2001. See, Bank al-Taqwa section *supra*.

600. Founded in 1991, the Qatar Charitable Society (or “QCS”) is a Qatari-based charity that now has offices throughout the world. Outside of its headquarters in Qatar, QCS currently has offices in Albania, Baku, Bangladesh, Bosnia, Dahgestan, Palestine, Pakistan, and Sudan. According to its website, QCS maintains the following mission:

QCS aims to offer relief and help to orphans, victims of war and disasters by supporting them financially, socially and culturally up to the age of 18. QCS aids widows to meet living expenses particularly those who lost all relatives and friends.

601. QCS' website is managed by Hashem Hussain. Hashem Hussain is a member of the Qatari Government's Ministry of Municipal Affairs and Agriculture and is both the administrative and billing contact for QCS' website. In August 2001, Qatari Ambassador Ali bin Muhammad al-USayri conveyed Qatar's commitment to the rehabilitation of Sudan. Al-USayri announced that the Qatari Government will contribute to Sudan through the efforts of the QCS.

602. In 1999, the Russian Interior Minister stated that QCS funneled money from Qatar to radical Chechen al Qaeda groups. In response to this accusation, the Qatari Foreign Minister Hamad bin Jasim bin Jar al-Thani did not deny that Qatar is funding al Qaeda terrorists in Chechnia during a November 20, 1999, *al-Jazeera* television interview:

Q. How do you answer these accusations?

A. ... The second issue, that of aid, I cannot say there is no aid –

Q. Why this aid?

A. First of all, we as a government cannot control the aid going abroad, some of which may go for humanitarian goals, and some may start as humanitarian but end up in another way. However, there is no monitoring because people are sympathizing with the Chechen people...

603. In this interview with *al-Jazeera*, the Qatari foreign minister also betrayed his underlying sympathy in favor of Chechen terrorists:

A. ... We as a government may be able to control our sympathy although in the end we are only human beings and Muslims. What we see in Chechnya is painful for us as Qatari, Arab, or Muslim citizens. Therefore we cannot restrain the people's feelings in this regard...

604. The Qatar Charitable Society's relationship with al Qaeda is very intimate. From the sharing of senior officers to the funding of al Qaeda attacks, QCS' role has clearly been to serve Osama bin Laden and further his international terrorist aims.

605. Qatar Charitable Society financially supports al Qaeda. The QCS' financial support for al Qaeda was demonstrated during the trial of al Qaeda operatives involved in the

1998 United States Embassy bombings in Kenya and Tanzania. In February 2001, the United States Government's lead witness and former al Qaeda member, Jamal Ahmed Mohamed al-Fadl, testified on QCS' relationship with al Qaeda. al-Fadl stated that in 1993 he was both a QCS employee and an al Qaeda member. He also stated that QCS' leader at that time, Dr. Abdullah Mohamed Yusef, was a member of al Qaeda as well, and a member of the Sudanese political group the National Islamic Front (or "NIF") that harbored Osama bin Laden in the early 1990s. When al-Fadl testified on his role with the QCS, he described Dr. Yusef's support of al Qaeda through the QCS:

A. The guy, he runs a group, he is one of our membership, one of the al Qaeda group membership, and also he is Islamic National Front membership, and he was in Afghanistan. So he helped our people for the travel, documents, and also if some money come from the Gulf area to the organization, he gives the group some money from that money.

Q. So the person that you knew in Afghanistan who was part of your group and part of the Islamic National Front, what was his name?

A. Dr. Abdullah Mohamed Yusef.

606. That two individuals, Al-Fadl and Dr. Yusef, were both members of al Qaeda and QCS indicates a high-level of coordination between the charity and the terrorist group. The complicity of QCS with al Qaeda's terrorist acts is noted in Dr. Yusef's funding of an al Qaeda attack through the QCS. As al-Fadl's testimony states:

Q. What did you do with him regard to the Qatar charitable organization?

A. He helped the jihad Eritrea group, and also he give \$20,000 for one of the attack (sic) outside of Sudan.

607. Al-Fadl has also stated that QCS aided, abetted and materially supported al Qaeda through non-financial means. In his second day of testimony, Al-Fadl discussed a meeting of al Qaeda members in 1994 that took place in QCS offices:

Q. When was the second meeting?

A. It's during '94.

- Q. Where was it?
A. In Jam Qatar Heira. It's Qatar organization.
Q. Is that the same organization you described yesterday or a different one?
A. Yes, same one.
Q. Is that the Qatar Charitable Organization?
A. Yes.

608. QCS' history and pattern of conduct is that of furthering the spread of Islamic international terrorism wherever possible. This underlying goal of the QCS is revealed through its financing of Wahhabi terrorists in the Caucasus region.

609. In April, 2002, the Azerbaijan Government annulled the registration of the QCS. This action was taken because, as stated by the Azerbaijani Justice Ministry, QCS engaged in activities that "contradict Azerbaijan's national interests." The Justice Ministry went on to say that QCS was targeted because it performed, "damaging activities that violate our national interests, as well as cooperated with terrorist structures and conducted propaganda inciting radical sectarianism, religious hatred and fanaticism."

610. In 1999, a group of Wahhabi militiamen invaded and took control of three districts of Dagestan, a country neighboring Chechnya. Dagestani police have identified that, the day before the attack, \$200,000 were transferred into QCS' account with the Dagestan Commercial Bank. Following the invasion, these funds were distributed to the terrorists. After this event, Dagestani police have been able to identify at least an additional \$1,000,000 that QCS transferred to aid the attack against Russia. During this investigation, Dagestani police have determined that there were no records of the funds flowing into and out of the QCS for a number of years.

611. The Government of Russia's International sponsors of Chechen terrorist list, from 1991-2000, is a comprehensive list of organizations that provided aid or support for terrorist organizations in Chechnya. The Qatar Charitable Society was included on this list.

612. Ahmed Ali al-Bugainain and Dr. Abdullah Mohamed Yusef are aiders, abettors, agents, co-conspirators and material supporters of Qatar Charitable Society, al Qaeda, and international terrorism.

Mercy International Relief Agency

613. The Saudi-backed Mercy International Relief Agency (a/k/a Mercy International, a/k/a Mercy) (or "MIRA") was incorporated in Dublin, Ireland in 1992 with the ostensible purpose of embarking on charitable activities around the world. All the incorporators of the charity are all of Saudi nationality and listed their address at Makkah, Saudi Arabia. MIRA also has branches in Somalia and Kenya. Its Dublin branch dissolved on January 16, 1998.

614. MIRA is funded by Saudi businessmen. During the trial of Osama bin Laden's personally secretary Wadih el-Hage, convicted for his role in the 1998 United States Embassy bombings in East Africa, Wadih el-Hage's testimony before a grand jury establishes that MIRA was funded by "Saudi merchants":

"Q. The grand jury had a couple of quick questions one of which is who funds the Mercy International relief agent in Kenya?

"A. Some Saudi merchants in Saudi Arabia.

"Q. Merchants in Saudi Arabia?

"A. Yes.

615. An al Qaeda member maintained that MIRA was an al Qaeda charity. L'Houssaine Kherchtou, a 36-year old Moroccan, joined al Qaeda in 1991. He affirmed this in his testimony as a government witness in the United States Embassy bombings trial. He worked for al Qaeda in Kenya, and noted specifically that MIRA served and sponsored al Qaeda's purposes. In his testimony, Kherchtou asserted that several al Qaeda members were workers at

MIRA, received identity cards from MIRA, and that the organization was dealing directly with Osama bin Laden himself:

- Q. And during the time that you were in Nairobi were you familiar with a charity or relief organization known as Mercy International Relief Organization?
- A. Yes.
- Q. And were there any al Qaeda people affiliated with the Mercy International Relief Organization?
- A. Let me just.
(Witness consults with interpreter)
- A. Yes, the people of al Qaeda they were dealing with the Mercy International.
- Q. Who were those people? Which al Qaeda people were dealing with Mercy International?
- A. Bin Laden, Mohammad Masry.
- Q. Are you talking about the military commander?
- A. Yes.
- Q. Abu Mohammad, are you talking about Saleh lay again?
- A. Yes.
- Q. Were there any people inside Mercy International who were part of al Qaeda in the past or the present?
- A. Well, in the past Abu Jamal he was the manager of that relief agency but he was in the past of al Qaeda.
- Q. You said Abu Jamal?
- A. Yes.
- Q. Anyone else in Mercy International who was a member of al Qaeda in the past or while in Kenya?
- A. The accountant of Mercy International, too, he was of al Qaeda but in the past his name Abu al Kheryemeni.
- Q. Did you ever see any al Qaeda members in Kenya who had identification cards in the Mercy International Relief agency?
- A. No.
- Q. Did you ever hear whether or not al Qaeda members in Nairobi obtained identification cards from Mercy International Relief agency?
- A. Yes.
- Q. Who did you hear obtained those cards?
- A. I heard that Abu Mohammed Amriki and Bin Laden they had identity card.

616. MIRA's Kenya Office served as a front for al Qaeda. Like many Osama bin Laden fronts, MIRA was an operating charity. The organization may have embarked upon actual charitable work, but only as a cover for their insidious goals. Following the Embassy bombings,

federal authorities raided the offices of MIRA in Kenya on August 21, 1998, after finding MIRA documents in Wadih el-Hage's residence. At MIRA's office, agents discovered documentary evidence linking it to Osama bin Laden. Assistant United States Attorney Pat Fitzgerald, who prosecuted the Defendants in the Embassy bombings trial, noted this much when he stated:

These documents show that Mercy International, while it does have legitimate charitable purpose, has other purposes that are contrary to that.

617. Some of the documents seized belonged to Wadih el-Hage and concerned Abu Ubaidah, a top al Qaeda leader who died in 1996. Fitzgerald stated:

When they searched Mercy International, they found a number of documents, included among which Wadih El Hage's files and files concerning Abu Ubaidah.

618. Documents found on site indicated that MIRA was smuggling weapons into Kenya from Somalia. Fitzgerald noted that authorities found a receipt dated July 24, 1998, on the back of which it was stated as related to getting weapons from Somalia.

619. FBI Agent John Michael Anticev interviewed Mohammed Odeh, who was convicted for his role in the 1998 Embassy bombings. Mr. Anticev testified that Mohammed Odeh explained to him that MIRA was working for al Qaeda.

Q. Did Odeh talk to you at all about an entity known as the Mercy International Relief Agency?

A. Yes.

Q. What did he tell you about the Mercy International Relief Agency?

A. That was also -- it was run by a guy in Nairobi named Tawhili, and that organization had ties to Al Qaeda, and Harun and Abu Ubaidah al Banshiri were close to that organization.

620. The individual referred to above as Tawhili is also known as Sheikh Ahmad Salem Suweidan, one of the FBI's most wanted terrorists. Therefore, a fugitive al Qaeda member ran MIRA at all relevant points up to the Embassy bombings. Agent Anticev further

related that Harun, Wadih el-Hage's former roommate who also worked for al Qaeda, frequented MIRA, typing information for top al Qaeda leadership:

- Q. Did Odeh describe to you any particular tasks that Harun performed for Al Qaeda?
- A. Yes. Harun, he said that Harun was a good typist, and, you know, he spent a lot of time at MIRA, the organization we just talked about, and he would type reports for the hierarchy in Al Qaeda.
- Q. And when you said MIRA, MIRA, are you referring to the Mercy International Relief?
- A. Yes, Mercy International Relief.
- Q. Did Odeh indicate to you what was contained in those reports that he typed for the hierarchy?
- A. In those reports they were using certain code words to conceal what their true intentions were.

621. An al Qaeda fugitive was deeply involved in MIRA's Branch in Dublin. Hamid Aich (or "Aich"), an Algerian who lived in Ireland and volunteered at the MIRA branch in Dublin, was heavily involved in the 2000 bomb plot to destroy Los Angeles International Airport (LAX). Shortly before moving to Ireland, Aich was a roommate of Ahmed Ressam, the man currently in jail for his role in the LAX bomb plot. On December 21, 1999, Aich was arrested by Irish authorities, seizing several personal papers and computer documents, though he was released shortly afterwards, while FBI agents were traveling to interrogate him. Aich fled and went into hiding, and his current whereabouts are unknown.

622. Documents found in MIRA's branch in Dublin link the charity to Zacarias Moussaoui. Travel documents found in a raid at a flat which served as one of MIRA's offices in Dublin are linked to forged documents used by alleged 20th hijacker, Zacarias Moussaoui, criminally charged in the September 11, 2001 attacks. The documents relate to air travel financed by Mustafa Ahmed al Hisawi, an alleged paymaster of September 11th. The documents show that Moussaoui's travel was financed by Hisawi. FBI agents maintain that the evidence

found at MIRA's office "proves 'without a shadow of a doubt' that Moussaoui is linked to Osama bin Laden."

623. Dr. Safar Alhawali, Dr. Soliman Alsaloomi, Dr. Mohamed Said Alghtani (a/k/a Alghatani, Al-Qohtany), Dr. Abdallah Aldomaiji (a/k/a Aldonaji), Abdalaziz Farsi, Faisal Alahmadi, and Waheed Almasry were co-conspirators, aiders and abettors, agents of MIRA and material sponsors of international terrorism.

Laundering of al Qaeda Funds Through Diamond Businesses

624. Yasmine Diamonds in Vereffening BVBA is a diamond company registered in Antwerp, Belgium. Ossailly's relatives are members of the board: Mike Ossailly, or Najla Ossailly, but the company is managed by Samih Ossailly.

625. Aziz Nassour and Samih Ossailly are both involved in diamonds business in Sierra Leone and Congo on behalf of al Qaeda leaders in order to continue its terrorists operations despite the international agreements to freeze bank accounts linked to al Qaeda. According to various investigations conducted on this issue, Samih Ossailly set up a safe house in Monrovia to funnel money from the diamonds fields to international terrorists throughout the world, including al Qaeda.

626. Echogem NV, was used as a courier to exchange \$300,000 for diamonds every week between December 2000 and September 2001.

627. Since 1998, Ibrahim Bah, through several Lebanese businessmen based in Belgium, has expanded his operations. Official sources identified the key brokers working with Bah as Aziz Nassour and Samih Ossailly.

628. A large part of these financial operations on behalf of al Qaeda were operated by Aziz Nassour through two companies in Belgium: African International Contact Office BVBA based in Brussels, and Echogem NV based in Antwerp.

629. Echogem, is based in Antwerp, Belgium. Until recently, the company was headed by Aziz Nassour as Managing director and Francis Gerres as CEO.

630. African International Contact Office BVBA is based in Brussels, Belgium. The company is chaired by Aziz Nassour as CEO and Ngalula Tseuhi is Managing Director of the company. Aziz Nassour ran his diamond trading activities with his cousin, Samih Ossailly, CEO of a company based in Brussels called Yasmine Diamonds in Vereffening BVBA. Ossailly is currently detained in Belgium, pending trial.

Additional Defendants

631. As a result of numerous ongoing civil, criminal, and governmental investigations, upon information and belief, Additional Defendants in this action will be identified as time proceeds. Numerous investigations are ongoing internationally which will result in additional evidence and information on al Qaeda terrorists, their sponsors, co-conspirators, scheme, enterprise, and financial support network. Additional Defendants 1-5,000 are the as yet unidentified terrorists and sponsors of terrorism that will be identified as investigations proceed and formal discovery commences. Additional Defendants 1-5,000 will be added to this civil action as they are identified, pursuant to F.R.C.P. 15(d) and Case Management Order No. 1, dated October 7, 2002. The same set of allegations and general facts as alleged herein apply to the Additional Defendants in terms of their culpability and amenability to suit under the legal theories expressed.

632. Like the Defendants herein, the Additional Defendants knew or reasonably should have known they were aiding and abetting or providing material support to terrorists and terrorist organizations who committed the September 11, 2001 savagery that murdered thousands of innocent persons.

633. Like the Defendants herein, the Additional Defendants engaged in negligent, grossly negligent, and/or intentional acts and breaches of duty which proximately caused the deaths and injuries of September 11, 2001. Like the Defendants herein, the Additional Defendants entered into a conspiracy, scheme, and RICO enterprise.

634. Additional Defendants include terrorist individuals, charities, banks, businesses, associations, entities, organizations front groups or any other parties as of yet unidentified who engaged in the material sponsorship, aiding and abetting of the September 11, 2001 attacks, Osama bin Laden, al Qaeda and/or international terrorism. As investigations and formal discovery identify these additional Defendants, they will be added to this action pursuant to Case Management Order No. 1 in this matter.

CLAIMS

COUNT ONE

FOREIGN SOVEREIGN IMMUNITIES ACT

635. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs.

636. The actions of the Foreign State Defendant, the Republic of Sudan, and the actions of its agencies and instrumentalities as described herein, forfeited their right to claim immunity of the Foreign Sovereign Immunities Act 28 U.S.C. §§ 1605(a)(2), 1605(a)(5) and 1605(a)(7). Pursuant to 28 U.S.C. § 1605(a)(7) and Pub. L. 104-208, Div. A, Title I, § 101(c), 110 Stat. 3009-172 (reprinted at 28 U.S.C. § 1605 note (West Supp.)), all Defendants who are officials, employees or agents of the Foreign State Defendant are individually liable to the Plaintiffs for damages caused by their acts which resulted in the death and injury of the Plaintiffs.

637. The Foreign State Defendant and the actions of its agencies and instrumentalities as described herein, conducted commercial activity that had a direct effect on the United States and is not immune pursuant to the Foreign Sovereign Immunities Act 28 U.S.C. § 1605(a)(2).

638. The Foreign State Defendant and the actions of its agencies and instrumentalities as described herein, is subject to liability from said acts resulting in personal injury and death in the United States caused by the tortious act or omission of the foreign state, officials and employees while acting within the scope of his office and employment and thus have forfeited their right to claim immunity pursuant to 28 U.S.C. § 1605(a)(5).

639. The Foreign State Defendant and its agencies and instrumentalities designated as state a sponsors of terrorism as described herein, is subject to liability for said acts and provision of material support for said acts resulting in personal injury and death in the United States as a result of act of torture, extra judicial killing, and aircraft sabotage and have forfeited their right to claim immunity pursuant to the 1996 Anti Terrorism Effective Death Penalty Act codified as 28 U.S.C. § 1605(a)(7).

640. As a direct result and proximate cause of the conduct of the Foreign State Defendant and its agencies, instrumentalities, officials, employees and agents that violated the federal and common laws cited herein, all Plaintiffs suffered damages as set forth herein.

WHEREFORE, Plaintiffs demand judgment in their favor against the Foreign State Defendant, the Sudanese agents and Instrumentalities and each of their officials, employees and agents, jointly, severally, and/or individually, in an amount in excess of One Trillion Dollars (\$1,000,000,000,000) plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate to compensate the Plaintiffs and deter the Defendants from ever again committing such terrorist acts.

COUNT TWO

TORTURE VICTIM PROTECTION ACT

641. Plaintiffs incorporate herein by reference the allegations contained in the preceding paragraphs.

642. The actions of the Defendants as described herein subjected the Plaintiffs to torture and extrajudicial killing within the meaning of the Torture Victim Protection Act, Pub.L. 102-256, 106 Stat. 73 (reprinted at 28 U.S.C.A. § 1350 note (West 1993)).

643. In carrying out these acts of extrajudicial killings and injury against the Plaintiffs, the actions of each Defendant were conducted under actual or apparent authority, or under color of law.

644. As a direct result and proximate cause of the Defendants' violation of the Torture Victim Protection Act, Plaintiffs suffered damages as fully set forth herein.

WHEREFORE, Plaintiffs demand judgment in their favor against all Defendants, jointly, severally, and/or individually, in an amount in excess of One Trillion Dollars (\$1,000,000,000,000) plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate to prevent the Defendants from ever again committing the terrorist acts of September 11, 2001 or similar acts.

COUNT THREE

18 U.S.C. § 2331 (2331 et. seq.) et. seq.

645. Plaintiffs incorporate herein by reference the averments contained in all preceding paragraphs.

646. The Defendants herein engaged in acts of international terrorism; activities that involve violent acts dangerous to human life that are in violation of the criminal law of the

United States and appear to be intended to intimidate or coerce a civilian population; to influence policy of a government by intimidation or coercion; or to affect the conduct of a government by assassination.

647. This activity transcends international boundaries in terms of the means by which they are accomplished, the persons they appear to intend to intimidate or coerce, or in terms of the locale in which the perpetrators operate or seek asylum. 18 U.S.C. 2331.

648. Nationals of the United States injured in his or her person, property or business by reason of an act of international terrorism, or his or her estate, survivors, or heirs, may sue therefore in any appropriate district court of the United States and shall recover therfold the damages he or she sustains and the costs of suit, including attorneys fees. 18 U.S.C. 2333.

649. As set forth above, Defendants, jointly, severally and proximately caused the deaths and injuries described herein through and by reason of acts of international terrorism, the aiding and abetting international terrorism, conspiring to commit further acts of international terror, engaging in criminal enterprise to promote international terrorism through illegal schemes, and/or the material support and sponsorship of international terrorism.

650. As set forth above, Defendants aided, abetted, conspired, or otherwise engaged in or provided material support for the acts of international terrorism, including but not limited to providing material support and/or aiding and abetting assistance to Osama bin Laden, al Qaeda, and international terrorism. This material support and/or aiding and abetting of acts of international terrorism allowed al Qaeda to carry out the terrorist attacks on the United States on September 11, 2001.

651. As a result of Defendants' acts in furtherance of international terrorism, including but not limited to financial sponsorship, training, education, travel, logistical or any other material support, all Plaintiffs suffered damages as set forth herein.

652. Pursuant to 18 U.S.C. §2333, the estates, survivors and heirs of the decedents who are nationals of the United States are entitled to recover threefold the damages they have sustained and the cost of suit, including attorneys' fees.

WHEREFORE, Plaintiffs, who are nationals of the United States, demand judgment in their favor against all Defendants, jointly, severally, and/or individually, and demand treble damages in excess of One Trillion Dollars (\$1,000,000,000,000), plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate to prevent Defendants from ever again committing such terrorist acts.

COUNT FOUR

ALIEN TORT CLAIMS ACT

653. Plaintiffs incorporate herein by reference the allegations contained in the preceding paragraphs.

654. As set forth above, the Defendants, individually, jointly and severally, aided and abetted, sponsored, financial, promoted, fostered, materially supported, or otherwise conspired to proximately cause the death and injury of innocent persons namely the Plaintiffs herein through and by reason of acts of international terrorism – the heinous attacks of September 11, 2001. These terrorist acts constitute a clear violation of the law of nations, otherwise referred to as customary international law, which includes international legal norms prohibiting mass murder, genocide, torture, air piracy, and terrorism. These international legal norms can be found in and derived from, among other things, the following conventions, agreements, U.N. declarations and resolutions, and other documents:

- (1) Charter of the International Military Tribunal, Aug. 8, 1945, 59 Stat. 1544, 82 U.N.T.S. 279;
- (2) Allied Control Council Law No. 10 (Dec. 20, 1945);
- (3) Convention on the Prevention and Punishment of the Crime of Genocide, Dec. 9 1948, 78 U.N.T.S. 277;
- (4) Geneva Convention (IV) Relative to the Protection of Civilian Persons in Time of War, Aug. 12, 1949, 75 U.N.T.S. 287;
- (5) Hague Convention for the Suppression of Unlawful Seizure of Aircraft (Hijacking), Dec. 16, 1970, 22 U.S.T. 1641, 860 U.N.T.S. 105;
- (6) Protocol Additional (I) to the Geneva Conventions of 12 August 1949, and Relating to the Protection of Victims of International Armed Conflict, June 8, 1977, 1125 U.N.T.S. 3;
- (7) Protocol Additional (II) to the Geneva Conventions of 12 August 1949, and Relating to the Protection of Victims of Non-International Armed Conflicts, June 8, 1977, 1125 U.N.T.S. 609;
- (8) Statute of the International Criminal Tribunal for the Former Yugoslavia (ICTY), in Report of the Secretary-General pursuant to paragraph 2 of S.C. Res.808, May 3, 1993, U.N. Doc. 8/25704, adopted unanimously by S.C. Res. 827, U.N. SCOR, 48th Sess., 3217th mtg., 16, U.N. Doc. S/PV.3217 (1993);
- (9) The Universal Declaration of Human Rights, Dec. 10, 1958, G.A. Res. 217A, U.N. Doc. A/810, at 71 (1948);
- (10) The International Covenant of Political and Civil Rights, Dec. 16, 1966, art. 6 (right to life), U.N. Doc. A/6316, 999 U.N.T.S. 171;
- (11) The Convention on the Prevention and Punishment of Crimes Against International Protected Persons, Including Diplomatic Agents, 28 U.S.T. 1975, T.I.A.S. No. 8532 (1977), implemented in 18 U.S.C. § 112l;
- (12) The General Assembly Resolutions on Measures to Prevent International Terrorism, G.A. Res. 40/61 (1985) and G.A. Res. 42/159 (1987); and
- (13) The Convention on the High Seas, April 29, 1958, arts. 14-22 (piracy), 13 U.S.T. 2312, 450 U.N.T.S. 11.

655. As a result of the Defendants' activities set forth above in violation of the customary international law norms of the law of nations, the Plaintiffs suffered injury and damages as set forth herein.

656. As a result and proximate cause of the Defendants' sponsorship of terrorism in violation of the law of nations and customary principles of international law, the Plaintiffs suffered injury and damages as set forth herein. Violations of the law of nations of international agreements, and of customary international law entitle non-United States citizens (or "aliens") to civil justice.

657. Pursuant to 28 U.S.C. §1350, the Plaintiffs' herein who are estates, survivors, heirs and family members of those killed or injured who were non-United States citizens (or "aliens") at the time of their illegal death or injury are entitled to recover damages they have sustained by reason of the Defendants' actions in furtherance of this crime against humanity.

WHEREFORE, Plaintiffs who are estates, survivors and heirs of non-United States' citizens (or "aliens), demand judgment in their favor against all Defendants, jointly, severally, and/or individually, in excess of One Trillion Dollars (\$1,000,000,000,000), plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate to compensate the victims, but prevent Defendants from ever again committing such terrorist acts.

COUNT FIVE

WRONGFUL DEATH

658. Plaintiffs incorporate herein by reference the allegations contained in the preceding paragraphs.

659. Plaintiffs herein bring this consolidated action pursuant to F.R.C.P. 42 for the wrongful death proximately caused by the Defendants engaging in, materially supporting or

sponsoring, financing, aiding and abetting, scheming and/or otherwise conspiring to commit or cause to occur acts of murder and wrongful death, specifically, the mass murder committed by the terrorist attacks acts of September 11, 2001.

660. Surviving family members or estates of those wrongfully killed are entitled to recover damages from Defendants for these illegal and wrongful deaths. The family members or estates are entitled to recover full damages incurred, as fair and just compensation for the injuries resulting from these wrongful deaths. Those responsible for these deaths must be held accountable for the losses incurred.

661. The injuries and damages suffered by the Plaintiffs were proximately caused by the intentional, malicious, reckless, criminal, violent, grossly negligent or negligent acts of the Defendants as described herein.

662. As a direct and proximate result of the wrongful deaths of the decedents, their heirs and families have suffered financially and been deprived of all future aid, income, assistance, services, comfort, companionship, affection and financial support of their loved ones.

663. As a direct and proximate result of the Defendants' acts of international terrorism torture, conspiracy and racketeering resulting in the wrongful death of decedents, the heirs and families of those murdered suffer and will continue to suffer permanent, physical and emotional distress, severe trauma, and lasting physical, emotional, and psychological injuries.

664. As a further result of intentional, willful, wanton, malicious, reckless, criminal, negligent, wrongful, illegal and tortious acts and conduct of the Defendants, the Plaintiffs have incurred actual damages including but not limited to ongoing medical expenses related to psychological trauma, physical injuries, and other expenses and losses for which they are entitled to full and fair recovery.

WHEREFORE, Plaintiffs demand judgment in their favor against all Defendants, jointly, severally, and/or individually, in an amount in excess of One Trillion Dollars (\$1,000,000,000,000) plus interest, costs, fees and such other monetary and equitable relief as this Honorable Court deems appropriate to compensate and deter Defendants from ever again committing acts of international terrorism.

COUNT SIX
NEGLIGENCE

665. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs.

666. All Defendants were under a general duty not to injure, murder or cause to be injured or murdered, not to commit or sponsor criminal or tortious acts, endanger lives, foster terror and/or engage in activity that would foreseeably lead to the personal injury and/or death of Plaintiffs. The banking, charity and individual Defendants were under heightened fiduciary duties as public and private trustees and as public servants endowed with the public's trust. Some Defendants undertook duties of care, others were endowed and entrusted duties by virtue of their position of public trust.

667. Defendants' breach of their duties was a proximate cause of the deaths and injuries at issue and the continuing trauma, loss, and personal injuries inflicted on Plaintiffs. Defendants' actions were negligent and/or grossly negligent.

WHEREFORE, Defendants are liable to Plaintiffs in an amount in excess of One Trillion Dollars (\$1,000,000,000,000) plus interest, costs, fees and such other monetary and equitable relief as this Honorable Court deems appropriate to prevent Defendants from ever again committing terrorist acts such as on September 11, 2001, or similar acts.

COUNT SEVEN

SURVIVAL

668. Plaintiffs incorporate herein by reference the allegations contained in all preceding paragraphs.

669. As a result of the intentional, malicious, reckless, conspiratorial, criminal, grossly negligent and negligent acts of Defendants as described herein, those killed on September 11, 2001, were placed in a severe, often prolonged, extreme, traumatic, apprehension of harmful, offensive unwarranted bodily contact, injury and assault. Those murdered suffered intensely severe and offensive harmful bodily contact, personal injury and battery; including but not limited to extreme fear, terror, anxiety, emotional and psychological distress, knowledge of pending death and physical and emotional trauma, intentionally inflicted physical pain. Decedents were mentally, physically and emotionally damaged, harmed, trapped, and falsely imprisoned prior to their personal physical injury and deaths.

670. As a result of Defendants' criminal and tortious conduct, those killed suffered damages including pain and suffering, severe trauma, fear, anxiety, permanent physical and emotional distress, ultimate loss of life and life's pleasures, companionship and consortium, loss of family, career, earnings and earning capacity, loss of accretion to their estates, and other immeasurable items of damages to be shown at trial. Plaintiffs herein seek and are entitled to survival damages for those tortured and killed on September 11, 2001.

WHEREFORE, Plaintiffs demand judgment in their favor against all Defendants, jointly, severally, and/or individually, in an amount in excess of One Trillion Dollars (\$1,000,000,000,000) plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate to prevent Defendants from ever again committing such terrorist acts.

COUNT EIGHT

NEGLIGENT AND/OR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

671. Plaintiffs incorporate herein by reference the averments contained in all preceding paragraphs.

672. Defendants intended or knew or should have known, that their conduct and actions would lead to the killing of or injury to innocent persons and resulting severe emotional distress; the Defendants intended, knew or should have known that the September 11, 2001, suicide hijackings and intended mass murder would kill, maim, and/or permanently injure innocent people, leaving devastated family members to grieve for their losses with ongoing physical, psychological and emotional injuries and ongoing post traumatic stress disorder on a horrific and massive scale.

673. The actions of Defendants were unconscionable and done with an intentional, malicious, willful, grossly negligent and/or negligent disregard for the rights and lives of those murdered, those injured, and the surviving loved ones.

674. As a direct and proximate cause of Defendants' negligent, grossly negligent and/or intentional misconduct and reckless disregard for human life, Plaintiffs have suffered and will forever continue to suffer severe, debilitating, permanent emotional, physical and psychiatric disorders, ongoing emotional distress and anxiety, physical and mental distress, and significant mental injury and impairment causing ongoing and long-term expenses for medical treatment, services, and counseling and long-term care, particularly for all minor Plaintiffs.

675. The acts and conduct of Defendants was undertaken in an intentional, grossly negligent and/or negligent manner intended to or reasonably foreseeable to result in the killing and injuring of innocent people. These criminal and tortuous acts culminated in the murder and

maiming of innocent people on September 11, 2001, and beyond, causing continuing, permanent emotional, mental and physical suffering to the families and heirs of the decedents.

676. Defendants, by engaging in this intentional, unlawful conduct, grossly negligently, and/or intentionally inflicted emotional distress upon the Plaintiffs.

WHEREFORE, Plaintiffs demand judgment in their favor against all Defendants, jointly, severally, and/or individually, in an amount in excess of One Trillion Dollars (\$1,000,000,000,000) plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate to prevent Defendants from ever again committing acts of international terrorism.

COUNT NINE

CONSPIRACY

677. Plaintiffs incorporate herein by reference the averments contained in all preceding paragraphs.

678. As set forth above, the Defendants, unlawfully, willfully and knowingly combined, conspired, confederated, aided and abetted, tacitly and/or expressly agreed to participate, cooperate and engage in unlawful and tortious acts pursuant to a common course of conduct, namely the promotion and sponsoring of international terrorism, resulting in the death and injury of Plaintiffs.

679. As set forth above, the Defendants conspired with, encouraged, furthered and agreed to provide material support, funding, sponsorship, aiding and abetting and/or other material resources to al Qaeda, Osama bin Laden, and the ends of international terrorism in furtherance of this conspiracy.

680. As set in detail herein, the Defendants engaged in a commonly motivated, organized, concerted and conspirational acts, efforts, transactions, material support, and activities

designed, intended, and foreseeably to cause acts of international terrorism including the terrorist attack on the United States, its citizens and society on September 11, 2001. Co-conspirators herein continue in their quest to attack the United States, resulting in the harm to Plaintiffs, which was done pursuant to and furtherance of this concert of action, agreement, enterprise, civil and criminal conspiracy and common scheme.

681. Defendants' concert of action, scheme, enterprise and conspiracy to support and promote Osama bin Laden, al Qaeda and international terrorism was a proximate cause of the September 11, 2001, terrorist attacks that killed and injured the Plaintiffs.

682. As a result of Defendants' concert of action and conspiracy to further international terrorism, Plaintiffs have suffered damages as will be shown at trial.

WHEREFORE, Plaintiffs demand judgment in their favor against all Defendants, jointly, severally, and/or individually, in an amount in excess of One Trillion Dollars (\$1,000,000,000,000) plus interest, costs, fees and such other monetary and equitable relief as this Honorable Court deems appropriate to prevent Defendants from ever again commit acts of international terrorism.

COUNT TEN

AIDING AND ABETTING

683. Plaintiffs incorporate herein by reference the averments contained in all preceding paragraphs.

684. As set forth above, Defendants knowingly and substantially assisted in the sponsorship of Osama bin Laden, al Qaeda, international terrorism and the September 11, 2001 terrorist attacks that killed and injured the Plaintiffs herein.

685. At the time of such aiding and abetting, Defendants knew or should have known that its role was part of an overall and ongoing illegal, criminal and/or tortious activity.

686. As set forth above, the Defendants aided and abetted in concerted efforts, transactions, acts and activities designed to cause the attacks of September 11, 2001, on the United States, its citizens, foreign citizens, its liberties and freedoms.

687. That Defendants' aiding and abetting of international terrorism through material sponsorship was a proximate cause of the September 11, 2001 terrorist attacks that killed and injured the Plaintiffs.

688. As a direct and proximate result of the Defendants' aiding and abetting activities, Plaintiffs have suffered damages as set forth herein.

WHEREFORE, Plaintiffs demand judgment in their favor against all Defendants, jointly, severally, and/or individually, in an amount in excess of One Trillion Dollars (\$1,000,000,000,000) plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate to prevent Defendants from ever again committing acts of international terrorism.

COUNT ELEVEN

VIOLATION OF THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT 18 U.S.C. § 1962(a)

689. Plaintiffs incorporate herein by reference the averments contained in all preceding paragraphs.

690. Non-Sovereign Defendants are each "persons" within the meaning of the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1961, et seq. ("RICO").

691. The Defendant charities, banks, businesses, terrorists, terrorist cells, and other individuals and entities comprise and are each an "enterprise" within the meaning of RICO, the activities of which affect intrastate and foreign commerce.

692. By virtue of the predicate criminal and tortuous acts as described in this Complaint, including but not limited to, engaging in the predicate acts of terrorism, murder, kidnapping, forgery, false use and misuse of passports, mail and wire fraud, fraud and misuse of visas, laundering of monetary instruments, engaging in monetary transaction in improperly derived from unlawful activity, the use of interstate commerce, interstate transportation of terrorist property, and bringing in and harboring illegal aliens, and/or aiding and assisting illegal aliens, terrorists and terrorism sponsors in entering the United States.

693. Osama bin Laden and al Qaeda, with the material support of Defendants herein, transferred, received, supplied, promoted, trained, financed, both directly and indirectly, from a pattern of racketeering activity in which Defendants participated as principals, agents and co-conspirators, used and invested, both directly and indirectly, the income and the proceeds of such acts, in furtherance of and in establishing and operating terrorist enterprises in violation of 18 U.S.C. § 1962(a), 18 U.S.C. § 1961 (1); inclusion of acts of terrorism as racketeering activity, H.R. 3162 – 11, USA Patriots Act 2001, § 813.

694. Defendants herein, including the agents, directors, officers, and employees of Defendants were associated in fact with a common purpose and constituted an “enterprise” as that term is defined in Title 18, United States Code, Section 1961 *et seq.*, which enterprise was engaged in, and the activities of which affected, interstate and foreign commerce. This enterprise, consisting of the herein described individuals, entities, and others known and unknown, is hereby referred to for purposes of this Complaint as the “al Qaeda Enterprise.” The al Qaeda Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

695. Defendants herein and others, being persons employed by and associated with an enterprise, namely the al Qaeda Enterprise, which engaged in and the activities of which affected interstate and foreign commerce, did conspire with other persons known and unknown, to violate Title 18, United States Code, Section 1962(a), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, that is, through multiple acts indictable under the laws of the United States, including:

- (a) 18 U.S.C. § 1341 (mail fraud);
- (b) 18 U.S.C. § 1343 (wire fraud);
- (c) 18 U.S.C. § 1503 (obstruction of justice);
- (d) 18 U.S.C. § 1956 (money laundering); and
- (e) 18 U.S.C. § 2339A (material support to organizations engaged in violent activities).

696. It was a part of the conspiracy that Defendants agreed that conspirators would commit acts of racketeering in the conduct of the affairs of the enterprise. It was part of the conspiracy that Defendants and co-conspirators devised, intended to devise, and participated in a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and material omissions.

697. It was a further part of the conspiracy that Defendants and others would and did misrepresent, conceal and hide, and cause to be misrepresented, concealed and hidden the purposes of, and acts done, in furtherance of the conspiracy, and in violation of Title 18, United States Code, Section 1962(a).

698. As a direct and proximate result of Defendants' violation of 18 U.S.C. § 1962(a), Plaintiffs suffered the loss of valuable property, financial services and support, and suffered other pecuniary and personal damages in an amount to be determined at trial.

WHEREFORE, Plaintiffs demand judgment in their favor against all Defendants, jointly, severally, and/or individually, in an amount in excess of One Trillion Dollars

(\$1,000,000,000,000), treble damages, plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate to prevent Defendants from ever again committing terrorist acts.

COUNT TWELVE

VIOLATION OF THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT 18 U.S.C. § 1962(c)

699. Plaintiffs incorporate herein by reference the averments contained in all preceding paragraphs.

700. By virtue of the criminal and tortuous acts as described herein, including without limitations, engaging in the predicate acts of terrorism, murder, kidnapping, forgery, false use and misuse of passports, mail and wire fraud, fraud and misuse of visas, laundering of monetary instruments, engaging in monetary transaction improperly derived from unlawful and tortuous activity. The use of interstate commerce, interstate transportation of terrorist property, bringing in and harboring illegal aliens, material sponsorship of, aiding and/or assisting illegal aliens, terrorists and terrorism sponsors in entering the United States.

701. Osama bin Laden and al Qaeda, with the material support of Defendants herein, transferred, received, supplied, promoted, trained, financed, and engaged in both directly and indirectly, a pattern of racketeering activity in which Defendants participated as principals, agents and co-conspirators in an enterprise, and used and invested, both directly and indirectly, the income and the proceeds of such acts in establishing and furthering the operation of terrorist enterprises, in violation of 18 U.S.C. § 1962(c); 18 U.S.C. § 1961(1); inclusion of acts of terrorism as racketeering activity, USA Patriots Act 2001, § 813.

702. Defendants herein, including the agents, directors, officers, and employees of Defendants were associated in fact with a common purpose and constituted an “enterprise” as

that term is defined in Title 18, United States Code, Section 1961 *et seq.*, which enterprise was engaged in, and the activities of which affected, interstate and foreign commerce. This enterprise, consisting of the herein described individuals, entities, and others known and unknown, is hereby referred to for purposes of this Complaint as the “al Qaeda Enterprise.” The al Qaeda Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

703. Defendants herein and others, being persons employed by and associated with an enterprise, namely the al Qaeda Enterprise, which engaged in and the activities of which affected interstate and foreign commerce, did conspire with other persons known and unknown, to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, that is, through multiple acts indictable under the laws of the United States, including:

- (a) 18 U.S.C. § 1341 (mail fraud);
- (b) 18 U.S.C. § 1343 (wire fraud);
- (c) 18 U.S.C. § 1503 (obstruction of justice);
- (d) 18 U.S.C. § 1956 (money laundering); and
- (e) 18 U.S.C. § 2339A (material support to organizations engaged in violent activities).

704. It was a part of the conspiracy that Defendants agreed that conspirators would commit acts of racketeering in the conduct of the affairs of the enterprise. It was part of the conspiracy that Defendants and co-conspirators devised, intended to devise, and participated in a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and material omissions.

705. It was a further part of the conspiracy that Defendants and others would and did misrepresent, conceal and hide, and cause to be misrepresented, concealed and hidden the

purposes of, and acts done, in furtherance of the conspiracy, and in violation of Title 18, United States Code, § 1962(c).

706. As a direct and proximate result of Defendants' violation of 18 U.S.C. § 1962(c), Plaintiffs suffered the loss of valuable property, financial services and support, and suffered other pecuniary damages in an amount to be determined at trial.

WHEREFORE, Plaintiffs demand judgment in their favor against all Defendants, jointly, severally, and/or individually, in an amount in excess of One Trillion Dollars (\$1,000,000,000,000), treble damages, plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate to prevent Defendants from ever again committing such terrorist acts.

COUNT THIRTEEN

VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT 18 U.S.C. § 1962(d)

707. Plaintiffs incorporate herein by reference the averments contained in all preceding paragraphs.

708. By virtue of the criminal and tortuous acts as described herein, including without limitations, engaging in the predicate acts of terrorism, murder, kidnapping, forgery, false use and misuse of passports, mail and wire fraud, fraud and misuse of visas, laundering of monetary instruments, engaging in monetary transaction improperly derived from unlawful and tortuous activity. The use of interstate commerce facilities in murder-for-hire, interstate transportation of terrorist property, bringing in and harboring illegal aliens, and aiding and/or assisting illegal aliens, material sponsorship of terrorists and terrorism sponsors in entering the United States.

709. Osama bin Laden and al Qaeda, with the material support of Defendants herein, transferred, received, supplied, promoted, trained, financed, both directly and indirectly, a pattern

of racketeering activity in which Defendants participated as principals, agents and co-conspirators in an enterprise, used and invested, both directly and indirectly, the income and the proceeds of such acts, in establishing and furthering the operation of terrorist enterprises, in violation of 18 U.S.C. § 1962(d); 18 U.S.C. § 1961(1); inclusion of acts of terrorism as racketeering activity, USA Patriots Act 2001, § 813.

710. Defendants herein, including the agents, directors, officers, and employees of Defendants were associated in fact with a common purpose and constituted an “enterprise” as that term is defined in Title 18, United States Code, Section 1961 *et seq.*, which enterprise was engaged in, and the activities of which affected, interstate and foreign commerce. This enterprise, consisting of the herein described individuals, entities, and others known and unknown, is hereby referred to for purposes of this Complaint as the “al Qaeda Enterprise.” The al Qaeda Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

711. Defendants herein and others, being persons employed by and associated with an enterprise, namely the al Qaeda Enterprise, which engaged in and the activities of which affected interstate and foreign commerce, did conspire with other persons known and unknown, to violate Title 18, United States Code, Section 1962(d), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, that is, through multiple acts indictable under the laws of the United States, including:

- (a) 18 U.S.C. § 1341 (mail fraud);
- (b) 18 U.S.C. § 1343 (wire fraud);
- (c) 18 U.S.C. § 1503 (obstruction of justice);
- (d) 18 U.S.C. § 1956 (money laundering); and
- (e) 18 U.S.C. § 2339A (material support to organizations engaged in violent activities).

712. It was a part of the conspiracy that Defendants agreed that conspirators would commit acts of racketeering in the conduct of the affairs of the enterprise. It was part of the conspiracy that Defendants and co-conspirators devised, intended to devise, and participated in a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and material omissions.

713. It was a further part of the conspiracy that Defendants and others would and did misrepresent, conceal and hide, and cause to be misrepresented, concealed and hidden the purposes of, and acts done, in furtherance of the conspiracy, and in violation of Title 18, United States Code, § 1962(d).

714. As a direct and proximate result of Defendants' violation of 18 U.S.C. § 1962(d), Plaintiffs suffered the loss of valuable property, financial services and support, and suffered other pecuniary and personal damages in an amount to be determined at trial.

WHEREFORE, Plaintiffs demand judgment in their favor against all Defendants, jointly, severally, and/or individually, in an amount in excess of One Trillion Dollars (\$1,000,000,000,000), treble damages, plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate to prevent Defendants from ever again committing terrorist acts.

COUNT FOURTEEN

PUNITIVE DAMAGES

715. Plaintiffs incorporate herein by reference the averments contained in all the preceding paragraphs.

716. The actions of the Defendants, acting in concert or otherwise conspiring to carry out, aid and abet these unlawful objectives of terror, were intentional, malicious, unconscionable, and in reckless disregard of the rights and safety of all Plaintiffs. Defendants, acting

individually, jointly, and/or severally intended to carry out actions that would brutalize or kill the Plaintiffs.

717. As a result of their intentional, malicious, outrageous, willful, reckless conduct, the Defendants are individually, jointly and severally liable to all Plaintiffs for punitive damages.

WHEREFORE, Plaintiffs demand judgment in their favor against all Defendants, jointly, severally, and/or individually, in an amount in excess of One Trillion Dollars (\$1,000,000,000,000) plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate to prevent Defendants from ever again committing such terrorist acts.

COUNT FIFTEEN

PUNITIVE DAMAGES – AGENCIES AND INSTRUMENTALITIES OF THE FOREIGN STATE DEFENDANT

718. Plaintiffs incorporate herein by reference the averments contained in all the preceding paragraphs.

719. The Foreign State Defendant and its agencies and instrumentalities, directly or indirectly caused, contributed to, supported, conspired to cause, aided and abetted the commission of the terrorist acts that resulted in the deaths and injuries as described herein.

720. The actions of the agencies and instrumentalities of the Foreign State Defendant, acting individually and/or in concert to carry out their unlawful objectives, were malicious, outrageous and in willful, wanton, unconscionable and reckless disregard for human life or the human and legal rights of all Plaintiffs. These agencies and instrumentalities, acting individually and jointly, engaging in material sponsorship, aiding and abetting, intended to engage in, promote, or otherwise sponsor and support terrorism.

721. Pursuant to 28 U.S.C.A. §1606, which specifically authorizes a claim for punitive damages arising from state sponsored terrorist acts actionable under 28 U.S.C. § 1605 (a)(7), and for the reasons stated herein, the agencies and instrumentalities of The Republic of Sudan are jointly and severally liable to all Plaintiffs for punitive damages, pursuant to Pub.L. 104-208, Div. A, Title I, §101(c), 110 Stat. 3009-172 (reprinted at 28 U.S.C. § 1605 note (West Supp.)).

722. Defendants who are officials, employees or agents of the Foreign State Defendant, the Sudanese Agencies and Instrumentalities, are also individually liable to Plaintiffs for punitive damages caused by the acts and conduct which resulted in the deaths and/or injuries of the Plaintiffs.

WHEREFORE, Plaintiffs demand judgment in their favor against the Foreign State Defendants, the Sudanese Agencies and Instrumentalities (and any other State sponsors of terrorism who are named herein in the future), and each of their officials, employees or agents, jointly, severally, and/or individually, in an amount in excess of One Trillion Dollars (\$1,000,000,000,000) plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate to prevent Defendants from ever again committing terrorist acts.

Common Issues Requiring Consolidation

723. Under Federal Rule of Civil Procedure 42, Plaintiffs respectfully ask this Court to certify common questions of law and fact to be tried as to all Defendants. Plaintiffs maintain that consolidation under Rule 42 a proper and efficient means of proceeding to avoid unnecessary costs or delay. These common legal and factual questions include, but are not limited to, the following:

- (a) Whether Defendants engaged in the sponsorship, financial or other material support, facilitation, encouragement, or any other means of aiding and abetting or participating in international terrorism, or

conspiring to promote, aid and abet or materially sponsor international terrorism, as that term is defined under United States or international law;

- (b) Whether Defendants are liable to Plaintiffs for wrongful death, survival, and/or personal injury pursuant to the Foreign Sovereign Immunities Act, the Alien Tort Act, the Torture Victim Protection Act, 18 U.S.C. § 2331 *et. seq.*, international law or the law of nations;
- (c) Whether the acts and conduct of the Defendants was a proximate cause of the terrorist attacks of September 11, 2001, and the resulting damage to Plaintiffs;
- (d) Whether the Defendants have engaged in an enterprise or scheme in violation of RICO, and if so, whether Plaintiffs are entitled to recover under this statute as amended by the USA Patriots Act, Section 813; *Inclusion of Acts of Terrorism as Racketeering Activity*;
- (e) Whether Plaintiffs are entitled to the assets of certain Defendants that have been designated as terrorist entities and had their assets frozen by the United States Department of Treasury in the event of a judgment;
- (f) Whether Plaintiffs are entitled to the assets of certain Defendants that have been frozen by foreign nations in order to satisfy a judgment;
- (g) Whether the Plaintiffs can institute pre-judgment attachments, notices of liens, or take away other equitable preemptive steps to monitor, prevent or track fraudulent asset transfer to avoid judgment;
- (h) Whether the Plaintiffs are entitled to treble damages;
- (i) Whether Defendants are liable to Plaintiffs for punitive damages, and if so, in what amount;
- (j) What is the proper measure of compensatory damages for Plaintiffs; and
- (k) What equitable relief or other relief is available to Plaintiffs herein, who ultimately seek accountability above all else.

WHEREFORE, Plaintiffs request that this Honorable Court facilitate discovery in this matter, determine and try the common legal and factual issues, and award Plaintiffs damages on each of the causes of action stated above plus interest, costs, expenses, attorney and expert fees, and such other monetary and equitable relief as this Honorable Court deems appropriate.

JURY DEMAND

Plaintiffs demand trial by jury on all issues so triable.

Respectfully Submitted,

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