

Statement of Facts

Investigation by the Columbus, Ohio FBI Joint Terrorism Task Force (JTTF), through interviews of international and U.S.-based witnesses and the analysis of thousands of physical exhibits, many of which were recovered from defendant's residences, establish that the defendant, Christopher Paul, provided material support and resources to terrorists by providing himself and others; by providing training; and by providing equipment, knowing and intending that such support would be used in preparation for or in carrying out a conspiracy to destroy property and causing the death and/or serious injury of human beings, which for purposes of this statement of facts will be referred to as "committing jihad."

- a. Since 1989, defendant **Christopher Paul** has been known by a number of aliases: including Abdul, Abdul Malek, Abdul Malik, Abdul Melik, Abdel Malek, Abdulmaled, Abdul Malek Kenyatta, Paul Kenyatta Laws, Paul Laws, hereinafter ("defendant"). Defendant is a United States citizen.
- b. In the early 1990s, defendant traveled to Pakistan and Afghanistan to join the mujahadeen. Upon his arrival in Pakistan, defendant stayed at the Beit Ul Ansar guest house, located in Peshawar, Pakistan. Beit Ul Ansar was a guest house affiliated with al Qaeda. While at Beit Ul Ansar, defendant went to Afghanistan and received initial training at an al Qaeda training camp. The training included, but was not limited to, map reading, climbing, use of assault rifles, grenades, rocket-propelled grenades, small unit tactics, and hand-to-hand combat. Successfully completing his initial training defendant joined al Qaeda and then stayed at Beit ur Salam guesthouse, which was exclusively for al Qaeda members. Distinguishing himself to al Qaeda, defendant was selected for and obtained advanced training in rappelling, military history, and explosives and explosive devices. Upon joining al Qaeda and having received their training, the defendant fought with other mujahadeen in Afghanistan.
- c. After fighting in Afghanistan, defendant returned to the United States for a period and began instructing individuals in martial arts at a mosque in Columbus, Ohio. Defendant also began recruiting and associating with individuals with jihadist intentions in order to establish a jihadist group in Columbus, Ohio.
- d. Over time and through his association with al Qaeda, the defendant became an individual dedicated to committing jihad, including causing the death of human beings and the destruction of property and furthering the objectives of al Qaeda and other radical Islamic fundamentalists.
- e. From 1993 through 1995 defendant, using various passports and aliases, returned

to the Balkans area in Europe and fought jihad in conflict zones such as Bosnia establishing further contacts with the radical Islamic fundamentalist movement and creating a master list of contact numbers for senior al-Qaeda leadership and other radical Islamic fundamentalists and operatives world-wide. On this master list, investigators also found listings of component parts for bombs/detonation devices. Defendant's master list of terrorist contacts and bomb-making information was seized by the Columbus JTTF in a search warrant at defendant's residence.

- f. The defendant returned to Columbus after jihad in the Balkans. In January 1997, defendant received a fax from two al Qaeda, radical Islamic fundamentalist co-conspirators from Europe asking, on behalf of "the brothers," for Paul to find them a "true group and place to make jihad." The term "brothers" is a euphemism for fellow radical Islamic fundamentalists, AQ members, or mujahadeen. The fax is in the possession of the Columbus JTTF.
- g. While in Columbus, as established by state park records, defendant and others stayed at Burr Oak state park and witnesses establish that defendant conducted hiking, camping, and other training operations in Burr Oak State Park in Ohio with several members of his local jihadist group replicating terrorist training defendant had received in conflict zones such as Afghanistan and Bosnia.
- h. Preparing to travel overseas again, on February 3, 1999, as established by official passport records, defendant obtained a passport in the name of "Christopher Paul," after defendant had claimed "water damage" to his old passport in one of his other aliases.
- i. Beginning in March 31, 1999 through January 31, 2000, as established by defendant's own phone records, on forty-four (44) occasions, defendant called a radical Islamic fundamentalist co-conspirator in Europe who in 2003 was arrested and has since been convicted of a terrorist conspiracy.
- j. As established by defendant's passport and cooperating witnesses, on April 16, 1999, defendant traveled to Germany to meet with members of a radical Islamic fundamentalist terrorist cell in Germany. Paul, who was known to the cell as an expert in bomb-making/detonation devices, was asked to travel to Germany to provide explosives training and information to this German terrorist cell.
- k. The government's investigation and witnesses establish that defendant provided such training knowing that the German terrorist cell was planning to use such

training and information to construct bombs, car bombs, and similar devices to be used against Americans while they vacationed at foreign tourist resorts.

- l. The government's investigation and witnesses establish that the German terrorist cell also planned to use bombs and similar devices against Americans within the United States and against property that was owned, leased, or used by the United States outside the United States such as U.S. embassies, diplomatic and consular premises and military bases located in Europe.
- m. After Germany, defendant returned to Columbus, Ohio. In May 1999, defendant had a member of the "true group" he had formed in Columbus purchase a printer/scanner for the defendant. This printer/scanner was then shipped to one of the German terrorist cell members Paul met with in April 1999. The document scanner was to assist the German cell in the manufacture of fraudulent documents which would then be used to facilitate the travel of jihadists worldwide. The cell member, however, did not claim the package in Germany and it was sent back to defendant and later recovered by the Columbus FBI JTTF.
- n. During this period defendant also purchased other equipment to be used by jihadists as part of the conspiracy, including a laser range finder and night vision equipment. Similar items were recovered during search warrants executed by the Columbus FBI JTTF.
- o. In November 1999, defendant's bank records show defendant wired transferred \$1,760 to one of the principal members of the German terrorist cell.

All of the foregoing evidence establishes that, from at least April 1999 through January 2000, the defendant, Christopher Paul, agreed with at least one other person to become a member of a conspiracy which intended to use a weapon of mass destruction, namely explosive devices, against one or more of the following: U.S. nationals outside the United States; persons or property within the United States affecting interstate or foreign commerce; and/or, property that was owned, leased, or used by the United States.