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New York, New York 10006  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACK :  
ON SEPTEMBER 11, 2001 : CIVIL ACTION NO.: 03 MD 1570  
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FEDERAL INSURANCE COMPANY; :  
PACIFIC INDEMNITY COMPANY; : CIVIL ACTION NO.: 03 CV 6978  
CHUBB CUSTOM INSURANCE :  
COMPANY; CHUBB INDEMNITY :  
INSURANCE COMPANY; CHUBB :  
INSURANCE COMPANY OF CANADA; :  
CHUBB INSURANCE COMPANY OF : **FIRST AMENDED**  
NEW JERSEY; GREAT NORTHERN : **COMPLAINT WITH**  
INSURANCE COMPANY; VIGILANT : **INCORPORATED MORE**  
INSURANCE COMPANY; ZURICH : **DEFINITE STATEMENTS,**  
AMERICAN INSURANCE COMPANY; : **RICO STATEMENTS AND**  
AMERICAN GUARANTEE AND : **RULE 15(d) SUPPLEMENTAL**  
LIABILITY INSURANCE COMPANY; : **PLEADINGS, FILED IN**  
AMERICAN ZURICH INSURANCE : **ACCORDANCE WITH**  
COMPANY; ASSURANCE COMPANY : **PARAGRAPH 13 OF CASE**  
OF AMERICA; COLONIAL AMERICAN : **MANAGEMENT ORDER**  
CASUALTY AND SURETY : **NUMBER 2**  
INSURANCE COMPANY; FIDELITY :  
AND DEPOSIT COMPANY OF :  
MARYLAND; MARYLAND :  
CASUALTY COMPANY; NORTHERN :  
INSURANCE COMPANY OF NEW : **JURY TRIAL DEMANDED**  
YORK; STEADFAST INSURANCE :  
COMPANY; VALIANT INSURANCE :  
COMPANY; ONE BEACON :  
INSURANCE COMPANY; ONE :  
BEACON AMERICA INSURANCE :  
COMPANY; AMERICAN EMPLOYERS' :  
INSURANCE COMPANY; THE :

CAMDEN FIRE INSURANCE :  
ASSOCIATION; HOMELAND :  
INSURANCE COMPANY OF NEW :  
YORK; CRUM & FORSTER :  
INDEMNITY COMPANY; NORTH :  
RIVER INSURANCE COMPANY; :  
UNITED STATES FIRE INSURANCE :  
COMPANY; AMERICAN :  
ALTERNATIVE INSURANCE :  
CORPORATION; GREAT LAKES :  
REINSURANCE U.K. PLC; AND THE :  
PRINCETON EXCESS & SURPLUS :  
LINES INSURANCE COMPANY; :  
AMLIN UNDERWRITING, LTD.; :  
HISCOX DEDICATED CORPORATE :  
MEMBER, LTD.; ALLSTATE :  
INSURANCE COMPANY; BOSTON :  
OLD COLONY INSURANCE :  
COMPANY; CONTINENTAL :  
INSURANCE COMPANY, :  
COMMERCIAL INSURANCE :  
COMPANY OF NEWARK, NJ; CNA :  
CASUALTY OF CALIFORNIA; :  
CONTINENTAL INSURANCE :  
COMPANY OF NEW JERSEY; :  
FIDELITY AND CASUALTY :  
COMPANY OF NEW YORK; GLENS :  
FALLS INSURANCE COMPANY; :  
NATIONAL BEN FRANKLIN :  
INSURANCE COMPANY OF ILLINOIS; :  
SENECA INSURANCE COMPANY, :  
INC.; CHINA AMERICA INSURANCE :  
COMPANY LIMITED; AMERICAN :  
INTERNATIONAL SPECIALTY LINES :  
INSURANCE COMPANY; AIU :  
INSURANCE COMPANY; COMMERCE :  
AND INDUSTRY INSURANCE :  
COMPANY; GRANITE STATE :  
INSURANCE COMPANY; AMERICAN :  
HOME ASSURANCE COMPANY; :  
AMERICAN HOME ASSURANCE :  
COMPANY (CANADA); BIRMINGHAM :  
FIRE INSURANCE COMPANY OF :  
PENNSYLVANIA; COMMERCE AND :  
INDUSTRY INSURANCE COMPANY :  
OF CANADA; ILLINOIS NATIONAL :

INSURANCE COMPANY; LEXINGTON :  
INSURANCE COMPANY; NATIONAL :  
UNION FIRE INSURANCE COMPANY :  
OF PITTSBURGH, PENNSYLVANIA; :  
NEW HAMPSHIRE INSURANCE :  
COMPANY; AMERICAN GLOBAL :  
INSURANCE COMPANY; ACE :  
AMERICAN INSURANCE COMPANY; :  
ACE BERMUDA INSURANCE LTD; :  
ACE INA INSURANCE COMPANY OF :  
CANADA; ACE INSURANCE SA-NV; :  
ACE PROPERTY & CASUALTY :  
INSURANCE COMPANY; ACE :  
CAPITAL V LTD; ATLANTIC :  
EMPLOYERS INSURANCE COMPANY; :  
BANKERS STANDARD INSURANCE :  
COMPANY; INDEMNITY INSURANCE :  
COMPANY OF NORTH AMERICA; :  
INSURANCE COMPANY OF NORTH :  
AMERICA; WESTCHESTER FIRE :  
INSURANCE COMPANY; :  
WESTCHESTER SURPLUS LINES :  
INSURANCE COMPANY; TIG :  
INSURANCE COMPANY; WOBURN :  
INSURANCE LTD; THE INSURANCE :  
COMPANY OF THE STATE OF :  
PENNSYLVANIA; ACE INDEMNITY :  
INSURANCE COMPANY; PACIFIC :  
EMPLOYERS INSURANCE COMPANY; :  
AXA CORPORATE SOLUTIONS :  
ASSURANCE; AXA CORPORATE :  
SOLUTIONS INSURANCE COMPANY; :  
AXA CORPORATE SOLUTIONS :  
ASSURANCE UK BRANCH; AXA :  
CORPORATE SOLUTIONS :  
ASSURANCE (CANADA); AXA RE :  
ASIA PACIFIC PTE. LIMITED; AXA :  
RE; AXA RE CANADIAN BRANCH; :  
AXA RE UK PLC.; AXA CORPORATE :  
SOLUTIONS REINSURANCE :  
COMPANY; AXA ART INSURANCE :  
CORPORATION; SPS REASSURANCE; :  
AXA RE MADEIRA BRANCH; :  
COMPAGNIE GERERALE DE :  
REINSURANCE DE MONTE CARLO; :  
AXA VERSICHERUNG AG; AXA :

CESSIONS; AXA GLOBAL RISKS UK; :  
TRANSATLANTIC REINSURANCE :  
COMPANY. :

Plaintiffs :

v. :

AL QAIDA; EGYPTIAN ISLAMIC :  
JIHAD; ASBAT AL-ANSAR; AL :  
GAMA'A AL-ISLAMIYYA; SALAFIST :  
GROUP FOR CALL AND COMBAT; :  
LASHKAR I JANGHVI; LASHKAR-E :  
TAYYIBA; JEMAAH ISLAMIYA :  
ORGANIZATION; HEZBOLLAH; ABU :  
SAYEF GROUP; ALGERIAN ARMED :  
ISLAMIC GROUP; HAMAS; :  
PALESTINE ISLAMIC JIHAD; THE :  
ISLAMIC REPUBLIC OF IRAN; :  
REPUBLIC OF IRAQ; THE REPUBLIC :  
OF THE SUDAN; SYRIAN ARAB :  
REPUBLIC; THE KINGDOM OF SAUDI :  
ARABIA; OSAMA BIN LADEN; :  
MUHAMMAD ATIF A/K/A SUBHI :  
SITTA A/K/A ABU HAFS AL-MASRI; :  
SAYF AL-ADL; ABU HAFS THE :  
MAURITANIAN A/K/A MAHFOUZ :  
OULD AL-WALID A/K/A KHALID AL- :  
SHANQITI; IBN AL-SHAYKH AL-LIBI; :  
ABU ZUBAYDAH A/K/A ZAYN AL :  
ABIDIN MUHAMMAD HUSAYN :  
TARIQ; ABD AL-HADI AL-IRAQI :  
A/K/A ABU ABDULLAH; AYMAN AL- :  
ZAWAHIRI; THIRWAT SALAH :  
SHIHATA A/K/A MUHAMMAD ALI; :  
TARIQ ANWAR AL-SAYYID AHMAD :  
A/K/A FATHI A/K/A AMR AL-FATIH; :  
MUHAMMAD SALAH A/K/A NASR :  
FAHMI NASR HASANAYN; :  
MAKHTAB AL-KHIDAMAT A/K/A AL- :  
KHIFAF; AL-ITIHAAD AL-ISLAMIYA :  
(AIAI); ISLAMIC ARMY OF ADEN; :  
WAFI HUMANITARIAN :  
ORGANIZATION; AL-RASHID TRUST; :  
MAMOUN DARKAZANLI IMPORT- :  
EXPORT COMPANY; NURJAMAN :

RIDUAN ISMUDDIN A/K/A HAMBALI; :  
 MOHAMMED IQBAL :  
 ABDURRAHMAN A/K/A/ ABU JIBRIL; :  
 BENEVOLENCE INTERNATIONAL :  
 FOUNDATION; BENEVOLENCE :  
 INTERNATIONAL FUND; BOSANSKA :  
 IDEALNA FUTURA; GLOBAL RELIEF :  
 FOUNDATION A/K/A FOUNDATION :  
 SECOURS MONDIAL; MOUNIR EL :  
 MOTASSADEQ; RAMZI BINALSHIBH; :  
 ZAKARYA ESSABAR; SAID BAHAJI; :  
 TURKISTAN ISLAMIC MOVEMENT; :  
 WA'EL HAMZA JUL AidAN A/K/A AL- :  
 HASAN AL MADANI; ADEL BEN :  
 SOLTANE; NABIL BENATTIA; :  
 YASSINE CHEKKOURI; RIADH :  
 JELASSI; MENDI KAMMOUN; SAMIR :  
 KISHK; TAREK BEN HABIB :  
 MAAROUFI; ABDELHALIM :  
 REMADNA; MANSOUR THAER; :  
 LAZHAR BEN MOHAMMED TLILI; :  
 HABIB WADDANI; AKIDA BANK :  
 PRIVATE LIMITED; AKIDA :  
 INVESTMENT CO. LTD.; NASREDDIN :  
 GROUP INTERNATIONAL HOLDING :  
 LTD.; NASCO NASREDDIN HOLDING :  
 A.S.; NASCOTEX S.A.; NASREDDIN :  
 FOUNDATION; BA TAQWA FOR :  
 COMMERCE AND REAL ESTATE :  
 COMPANY LTD.; 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 NASSNEDDIN EC; :  
 NADA INTERNATIONAL ANSTALT; :  
 NASREDDIN INTERNATIONAL :  
 GROUP LIMITED HOLDING; THE AID :  
 ORGANIZATION OF THE ULEMA; :  
 AHMED IDRIS NASREDDIN; YOUSSEF :  
 NADA; ABDELKADIR MAHMOUD ES :  
 SAYED; KHALID AL-FAWAZ; ABU :  
 HAMZA AL-MASRI; MOHAMED BEN :  
 BELGACEM AOUADI; MOKHTAR :

BOUGHOUGHHA; TAREK CHARAABI; :  
SAMI BEN KHEMAIS ESSID; LASED :  
BEN HENI; SOMALIA BRANCH OF :  
THE AL-HARAMAIN ISLAMIC :  
FOUNDATION; BOSNIA- :  
HERZEGOVINA BRANCH OF AL- :  
HARAMAIN ISLAMIC FOUNDATION; :  
UMMA TAMEER-E-NAU (UTN); :  
BASHIR-UD-DIN MAHMOOD; ABDUL :  
MAJEED; S.M. TUFAIL; AL- :  
BARAKAAT; AL TAQWA/NADA :  
GROUP; AARAN MONEY WIRE :  
SERVICE, INC.; AL BARAKA :  
EXCHANGE LLC; AL BARAKAAT :  
BANK; AL-BARAKAT BANK OF :  
SOMALIA (BSS); AL-BARAKAT :  
FINANCE GROUP; AL-BARAKAT :  
FINANCIAL HOLDING CO.; AL- :  
BARAKAT GLOBAL :  
TELECOMMUNICATIONS; AL- :  
BARAKAT GROUP OF COMPANIES :  
SOMALIA LIMITED; AL-BARAKAT :  
INTERNATIONAL A/K/A BARACO CO; :  
AL-BARAKAT INVESTMENTS; AL- :  
BARAKAT WIRING SERVICE; AL :  
TAQWA TRADE, PROPERTY AND :  
INDUSTRY COMPANY LIMITED; :  
ASAT TRUST; BANK AL TAQWA :  
LIMITED; BARAKA TRADING :  
COMPANY; BARAKAAT BOSTON; :  
BARAKAAT CONSTRUCTION :  
COMPANY; BARAKAAT :  
ENTERPRISE; BARAKAAT GROUP OF :  
COMPANIES; BARAKAAT :  
INTERNATIONAL; BARAKAAT :  
INTERNATIONAL FOUNDATION; :  
BARAKAAT INTERNATIONAL, INC.; :  
BARAKAAT NORTH AMERICA, INC.; :  
BARAKAAT RED SEA :  
TELECOMMUNICATIONS; :  
BARAKAAT TELECOMMUNICATIONS :  
CO. SOMALIA; BARAKAT BANK AND :  
REMITTANCES; BARAKAT :  
COMPUTER CONSULTING (BCC); :  
BARAKAT CONSULTING GROUP :  
(BCG); BARAKAT GLOBAL :

TELEPHONE COMPANY; BARAKAT :  
 INTERNATIONAL COMPANIES :  
 (BICO); BARAKAT POST EXPRESS :  
 (BPE); BARAKAT REFRESHMENT :  
 COMPANY; BARAKAT WIRE :  
 TRANSFER COMPANY; BARAKAT :  
 TELECOMMUNICATIONS COMPANY :  
 LIMITED (BTELCO); BARAKO :  
 TRADING COMPANY, LLC; GLOBAL :  
 SERVICES INTERNATIONAL; :  
 HEYATUL ULYA; NADA :  
 MANAGEMENT ORGANIZATION; :  
 PARKA TRADING COMPANY; RED :  
 SEA BARAKAT COMPANY LIMITED; :  
 SOMALIA INTERNATIONAL RELIEF :  
 ORGANIZATION; SOMALIA :  
 INTERNET COMPANY; SOMALIA :  
 NETWORK AB; YOUSSEF M. NADA & :  
 CO. GESELLSCHAFT MBH; YOUSSEF :  
 M. NADA; HUSSEIN MAHMUD :  
 ABDULLKADIR; ABDIRASIK ADEN; :  
 ABBAS ABDI ALI; ABDI ADULAZIZ :  
 ALI; YUSAF AHMED ALI; DAHIR :  
 UBEIDULLAHI AWEYS; HASSAN :  
 DAHIR AWEYS; ALI GHALEB :  
 HIMMAT; ALBERT FREDRICH :  
 ARMAND HUBER; LIBAN HUSSEIN; :  
 ABDULLAHI HUSSEIN KAHIE; :  
 MOHAMMED MANSOUR; ZEINAB :  
 MANSOUR-FATTAH; ABDULLAH :  
 AHMED ABDULLAH A/K/A ABU :  
 MARIAM A/K/A ABU MOHAMED AL- :  
 MASRI A/K/A SALEH; HAJI ABDUL :  
 MANAN AGHA A/K/A ABD AL- :  
 MAN'AM SAIYID; AL-HAMATI :  
 SWEETS BAKERIES; MUHAMMAD :  
 AL-HAMATI A/K/A MOHAMMAD :  
 HAMDY SADIQ AL-AHDAL A/K/A ABU :  
 ASIM AL-MAKKI; AMIN AL-HAQ :  
 A/K/A DR. AMIN AH HAQ A/K/A :  
 MUHAMMAD AMIN A/K/A DR. AMIN :  
 UL-HAQ; SAQAR AL-SADAWI; :  
 AHMAD SA'ID AL-KADR A/K/A ABU :  
 ABD AL-RAHMAN AL-KANADI; :  
 ANAS AL-LIBY A/K/A ANAS AL-LIBI :  
 A/K/A NAZIM AL-RAGHIE A/K/A :

NAZIH ABDUL HAMED AL-RAGHIE :  
 A/K/A ANAS AL-SABAI; AHMAD :  
 IBRAHIM AL- MUGHASSIL A/K/A :  
 ABU OMRAN A/K/A AHMED :  
 IBRAHIM AL-MUGHASSIL; :  
 ABDELKARIM HUSSEIN MOHAMED :  
 AL-NASSER; AL-NUR HONEY PRESS :  
 SHOPS A/K/A AL-NUR HONEY :  
 CENTER; YASIN AL-QADI A/K/A :  
 SHAYKH YASSIN ABDULLAH KADI :  
 A/K/A YASIN KAHDI; SA'D AL- :  
 SHARIF; AL-SHIFA' HONEY PRESS :  
 FOR INDUSTRY AND COMMERCE; :  
 IBRAHIM SALIH MOHAMMED AL- :  
 YACOB; AHMED MOHAMMED :  
 HAMED ALI A/K/A AHMED :  
 MOHAMMED ABDUREHMAN A/K/A :  
 ABU FATIMA A/K/A ABU ISLAM :  
 A/K/A ABU KHADIJAH A/K/A :  
 AHMED HAMED A/K/A AHMED THE :  
 EGYPTIAN A/K/A AHMED AHMED :  
 A/K/A AHAMAD AL-MASRI A/K/A :  
 ABU ISLAM AL-SURIR A/K/A AHMED :  
 MOHAMMED ALI A/K/A HAMED ALI :  
 A/K/A AHMED HEMED A/K/A AHMED :  
 SHIEB A/K/A SHUAIB; ALI ATWA :  
 A/K/A AMMAR MANSOUR BOUSLIM :  
 A/K/A HASSAN ROSTOM SALIM; :  
 MUHSIN MUSA MATWALLI ATWAH :  
 A/K/A ABDEL RAHMAN A/K/A :  
 ABDUL RAHMAN A/K/A ABDUL :  
 RAHMAN AL-MUHAJIR A/K/A :  
 MOHAMMED K.A. AL-NAMER; BILAL :  
 BIN MARWAN; AYADI CHAFIQ BIN :  
 MUHAMMAD A/K/A BEN :  
 MUHAMMAD AIADI A/K/A BEN :  
 MUHAMMAD AIADY A/K/A BEN :  
 MUHAMMAD AYADI CHAFIK A/K/A :  
 BEN MUHAMMAD AYADI SHAFIQ; :  
 MAMOUN DARKAZANLI; ALI SAED :  
 BIN ALI EL-HOORIE A/K/A ALI SAED :  
 BIN ALI AL-HOURI A/K/A ALI SAED :  
 BIN ALI EL-HOURI; MUSTAFA :  
 MOHAMED FADHIL A/K/A ABD AL :  
 WAKIL AL MASRI A/K/A ABU AL- :  
 NUBI A/K/A HASSAN ALI A/K/A ABU :



ANIS A/K/A MOUSTAFA ALI ELBISHY :  
 A/K/A MUSTAFA MUHAMAD FADIL :  
 A/K/A MUSTAFA FAZUL A/K/A :  
 HUSSEIN A/K/A ABU JIHAD A/K/A :  
 KHALID A/K/A NU MAN A/K/A :  
 MUSTAFA MOHAMMED A/K/A ABU :  
 YUSSRR; AHMED KHALFAN :  
 GHAILANI A/K/A AHMED THE :  
 TANZANIAN A/K/A FOOPIE A/K/A :  
 FUPI A/K/A ABU BAKR AHMAD A/K/A :  
 A. AHMED A/K/A ABUBAKAR :  
 AHRMED A/K/A ABUBAKAR K. :  
 AHMED A/K/A ABUBAKAR KHALFAN :  
 AHMED A/K/A ABUBAKARY K. :  
 AHMED A/K/A AHMED KHALFAN :  
 AHMED A/K/A AHMAD AL TANZANI :  
 A/K/A AHMED KHALFAN ALI A/K/A :  
 ABU BAKR A/K/A ABUBAKARY :  
 KHALFAN AHMED GHAILANI A/K/A :  
 AMMED GHAILANI A/K/A AHMAD :  
 KHALAFAN GHILANI A/K/A :  
 MAHAFUDH ABUBAKAR AHMED :  
 ABDALLAH HUSSEIN A/K/A ABU :  
 KHABAR A/K/A AHMED KHALFAN :  
 A/K/A SHARIFF OMAR MOHAMMED; :  
 RIAD HIJAZI A/K/A ABU-AHMAD AL- :  
 AMRIKI A/K/A ABU-AHMAD AL- :  
 HAWEN A/K/A RASHID AL- :  
 MAGHRIBI A/K/A ABU-AHMAD AL- :  
 SHAHID A/K/A M RAED HIJAZI; :  
 HASAN IZZ-AL-DIN A/K/A AHMED :  
 GARBAYA A/K/A SA-ID A/K/A SAMIR :  
 SALWWAN; JAISH-I-MOHAMMED :  
 A/K/A ARMY OF MOHAMMED; :  
 JAM'YAH TA'AWUN AL-ISLAMIA :  
 A/K/A JAM'IYAT AL TA'AWUN AL :  
 ISLAMIYYA A/K/A JIT A/K/A :  
 SOCIETY OF ISLAMIC :  
 COOPERATION; MUFTI RASHID :  
 AHMAD LADEHYANOY A/K/A MUFTI :  
 RASHEED AHMA A/K/A MUFTI :  
 RASHID AHMAD LUDHIANVI A/K/A :  
 MUFTI RASHID AHMAD :  
 WADEHYANOY; FAZUL ABDULLAH :  
 MOHAMMED A/K/A FAZUL :  
 ABDALLA A/K/A FAZUL ADBALLAH :

A/K/A ABU AISHA A/K/A ABU SEIF :  
 AL SUDANI A/K/A FADEL :  
 ABDALLAH MOHAMMED ALI A/K/A :  
 ABDALLA FAZUL A/K/A ABDALLAH :  
 FAZUL A/K/A ABDALLAH :  
 MOHAMMED FAZUL A/K/A HAROON :  
 FAZUL A/K/A HARUN FAZUL A/K/A :  
 HAROON A/K/A FADHIL HAROUN :  
 A/K/A HARUN A/K/A ABU LUQMAN :  
 A/K/A FAZUL MOHAMMED A/K/A :  
 FAZUL ABDILAH MOHAMMED :  
 A/K/A FOUAD MOHAMMED A/K/A :  
 FADIL ABDALLAH MUHAMAD; :  
 KHALID SHAIKH MOHAMMED A/K/A :  
 SALEM ALI A/K/A FAHD BIN :  
 ABDALLAH BIN KHALID A/K/A :  
 ASHRAF REFAAT NABITH HENIN :  
 A/K/A KHALID ADBUL WADOOD; :  
 FAHID MOHAMMED ALLY MSALAM :  
 A/K/A USAMA AL-KINI A/K/A FAHID :  
 MOHAMMED ALLY A/K/A FAHAD :  
 ALLY MSALAM A/K/A FAHID :  
 MOHAMMED ALI MSALAM A/K/A :  
 MOHAMMED ALLY MSALAM A/K/A :  
 FAHID MOHAMMED ALI MUSALAAM :  
 A/K/A FAHID MUHAMAD ALI SALEM; :  
 RABITATRUST; ANSAR AL-ISLAM :  
 (AI) A/K/A JUND AL-ISLAM; YOUSSEF :  
 ABDAOUI A/K/A ABU ABDULLAH :  
 A/K/A ABDELLAH A/K/A ABDULLAH; :  
 MOHAMMED AMINE AKLI A/K/A :  
 SAMIR A/K/A KALI SAMI A/K/A :  
 ELIAS; MOHREZ AMDOUNI A/K/A :  
 FABIO FUSCO A/K/A MOHAMMED :  
 HASSAN A/K/A TUALE ABU; CHIHEB :  
 BEN MOHAMED AYARI A/K/A ABU :  
 HOHEM HICHEM; MONDHER :  
 BAAZAOUI A/K/A HAMZA; LIONEL :  
 DUMONT A/K/A BILAL A/K/A HAMZA :  
 A/K/A JACQUES BROUGERE; :  
 MOUSSA BEN AMOR ESSAADI A/K/A :  
 DAH DAH A/K/A ABDELRAHMMAN :  
 A/K/A BECHIR; RACHID FEHAR A/K/A :  
 AMINEDEL BELGIO A/K/A DJAFFAR; :  
 BRAHIM BEN HEDILI HAMAMI; :  
 KHALIL JARRAYA A/K/A KHALIL :

YARRAYA A/K/A AZIZ BEN NARVAN :  
 ABDEL' A/K/A AMRO A/K/A OMAR :  
 A/K/A AMROU A/K/A AMR; MOUNIR :  
 BEN HABIB JERRAYA A/K/A :  
 YARRAYA; FOUZI JENDOUBI A/K/A :  
 SAID A/K/A SAMIR; FETHI BEN :  
 REBAI MASRI A/K/A AMOR A/K/A :  
 OMAR ABU A/K/A FETHI ALIC; NAJIB :  
 OUAZ; AHMED HASNI RARRBO :  
 A/K/A ABDALLAH A/K/A ABDULLAH; :  
 NEDAL SALEH A/K/A HITEM; :  
 ABDELGHANI MZOUDI; GULBUDDIN :  
 HEKMATYAR; IMAD MUGHNIYEH; :  
 MUHAMMAD OMAR; ISLAMIC :  
 INTERNATIONAL BRIGADE; SPECIAL :  
 PURPOSE ISLAMIC REGIMENT; :  
 RIYADUS-SALIKHIN RECOGNIZANCE :  
 AND SABOTAGE BATTALION OF :  
 CHECHEN MARTYRS; OSAMA :  
 BASSNAN; OMAR AL-BAYOUMI; :  
 FAHAD AL-THUMAIRY; WORLD :  
 ASSEMBLY OF MUSLIM YOUTH; :  
 SHEIKH AHMED SALIM SWEDAN; :  
 MUHAMMAD ABU-ISLAM; :  
 ABDULLAH 'QASSIM; HASHIM :  
 ABDULRAHMAN; JAMAL AL- :  
 BADAWI; MOHAMMED OMAR AL- :  
 HARAZI; WALID AL-SOUROURI; :  
 FATHA ADBUL RAHMAN; YASSER :  
 AL-AZZANI; JAMAL BA KHORSH; :  
 AHMAD AL-SHINNI; JAMIL QASIM :  
 SAEED; MOHAMED BAYAZID; ABU :  
 MUSAB ZARQAWI; SHEIKH OMAR :  
 BAKRI MUHAMMAD; ABDUL :  
 FATTAH ZAMMAR; GHASOUB AL :  
 ABRASH GHALYOUN A/K/A ABU :  
 MUSAB; BENSAYAH BELKACEM; :  
 SABIR LAMAR; WADIH EL-HAGE; :  
 WALI KHAN AMIN SHAH; ZACARIAS :  
 MOUSSAOUI; THE TALIBAN; ABDEL :  
 HUSSEIN; NATIONAL ISLAMIC :  
 FRONT; HASSAN TURABI; ABD AL- :  
 MUSHIN AL-LIBI; ABDUL RAHMAN :  
 KHALED BIN MAHFOUZ; ABDUL :  
 RAHMAN YASIN; ABDULLA AL :  
 OBAID; ABDULA BIN LADEN; :

ADVICE AND REFORMATION :  
 COMMITTEE; AFGHAN SUPPORT :  
 COMMITTEE; AL-HARAMAIN A/K/A :  
 AL-HARAMAIN FOUNDATION; :  
 ENAAM M. ARNANOUT; :  
 INTERNATIONAL ISLAMIC RELIEF :  
 ORGANIZATION; INTERNATIONAL :  
 INSTITUTE OF ISLAMIC THOUGHT; :  
 ISLAMIC CULTURAL INSTITUTE OF :  
 MILAN; JAMAL BARZINJI; KHALED :  
 BIN MAHFOUZ; MOHAMMED JAMAL :  
 KHALIFA; MUSLIM WORLD LEAGUE; :  
 NATIONAL COMMERCIAL BANK; :  
 PRINCE NAYEF BIN ABDULAZIZ AL :  
 SAUD; PRINCE SULTAN BIN :  
 ABDULAZIZ AL SAUD; RABIH :  
 HADDAH; SAAR FOUNDATION; :  
 SAUDI SUDANESE BANK; AL :  
 SHAMAL ISLAMIC BANK; SHEIKH :  
 ABU BDUL AZIZ NAGI; SHEIK ADIL :  
 GALIL BATARGY A/K/A ADEL :  
 ABDUL JALIL BATTERJEE; :  
 SULEIMAN ABDEL AZIZ AL RAJHI; :  
 TABA INVESTMENTS; ULEMA UNION :  
 OF AFGHANISTAN; WADI AL AQIQ; :  
 AL-SHAYKH AL-IRAQI; AZZAM :  
 SERVICE CENTER; ABU HAJER AL :  
 IRAQI; MOHAMMED AL FAISAL AL :  
 SAUD; AL-HIJRAH CONSTRUCTION :  
 AND DEVELOPMENT LIMITED; GUM :  
 ARABIC COMPANY LIMITED; AL :  
 SHAMAL FOR INVESTMENT AND :  
 DEVELOPMENT; SALEH ABDULLAH :  
 KAMEL; AL BARAKA INVESTMENT :  
 AND DEVELOPMENT; SAUDI :  
 DALLAH AL BARAKA GROUP LLC; :  
 AL-BIR SAUDI ORGANIZATION; :  
 MOHAMMAD S. MOHAMMAD; :  
 TADAMON ISLAMIC BANK; :  
 MUSTASIM ABDEL-RAHIM; :  
 MOHAMED SADEEK ODEH; MAHDI :  
 CHAMRAN SAVEHI; MOHAMMED :  
 SARKAWI; AL TAWHID; HAJI :  
 MOHAMAD AKRAM; ABDALLAH :  
 OMAR; UMAR FARUQ; ABD AL- :  
 RAHIM AL-NASHIRI; TURKI AL :

FAISAL AL SAUD A/K/A PRINCE :  
 TURKI; PRINCE SALMAN BIN ABDUL :  
 AZIZ AL SAUD A/K/A PRINCE :  
 SALMAN; ZOUAYDI A/K/A :  
 MUHAMMED GALEB KALAJE :  
 ZOAAAYDI A/K/A ABU TALHA; :  
 MULLAH KAKSHAR; ARAFAT EL- :  
 ASAHI; MUSHAYT FOR TRADING :  
 ESTABLISHMENT; ABDULLAH BIN :  
 ABDUL MUHSEN AL TURKI A/K/A AL :  
 TURKI; SAUDI HIGH COMMISSION :  
 A/K/A THE SAUDI HIGH RELIEF :  
 COMMISSION; ABDUL AZIZ AL :  
 IBRAHIM A/K/A AL IBRAHIM; HELP :  
 AFRICAN PEOPLE; IBRAHIM BIN :  
 ABDUL AZIZ AL IBRAHIM :  
 FOUNDATION; MERCY :  
 INTERNATIONAL RELIEF AGENCY; :  
 ISLAMIC MOVEMENT OF :  
 UZBEKISTAN; SAUDI BIN LADEN :  
 GROUP; BAKR M. BIN LADEN; :  
 MOHAMMED BAHARETH; TAREK M. :  
 BIN LADEN; OMAR M. BIN LADEN; :  
 MOHAMMED BIN LADEN :  
 ORGANIZATION; YESLAM M. BIN :  
 LADEN; GLOBAL DIAMOND :  
 RESOURCE; HUMAN CONCERN :  
 INTERNATIONAL SOCIETY; TALAL :  
 MOHAMMED BADKOOK; DR. :  
 MOHAMAN ALI ELGARI; NEW :  
 DIAMOND HOLDINGS; AL-RAJHI :  
 BANKING & INVESTMENT :  
 CORPORATION; SALEH ABDULAZIZ :  
 AL-RAJHI; ABDULLAH SULAIMAN :  
 AL-RAJHI; MAR-JAC POULTRY; MAR- :  
 JAC INVESTMENTS, INC.; PIEDMONT :  
 POULTRY; SALIM BIN MAHFOUZ; :  
 RED CRESCENT SAUDI COMMITTEE; :  
 BLESSED RELIEF (MUWAFaq) :  
 FOUNDATION; ABDULRAHMAN BIN :  
 KHALID BIN MAHFOUZ; AL-BIRR; :  
 HISHAM; HEZB-E-ISLAMI; SAIF AL :  
 ISLAM EL MASRY; SYED SULEMAN :  
 AHMER; MAZIN M.H. BAHARETH; :  
 SHAHIR ABDULRAOOF BATTERJEE; :  
 ZAHIR H. KAZMI; MUZAFFAR KHAN; :

JAMAL NYRABEH; AHMAD AJAJ; :  
 SUCCESS FOUNDATION; :  
 ABDULRAHMAN ALAMOUDI; :  
 AMERICAN MUSLIM FOUNDATION; :  
 MOHAMMED OMEISH; ADNAN :  
 BASHA; MAHMOUD JABALLAH; :  
 ARAFAT EL-ASHI; MORO ISLAMIC :  
 LIBERATION FRONT; JAMAL AHMED :  
 MOHAMMED; MOHAMMED KHATIB; :  
 SAUDI JOINT RELIEF COMMITTEE; :  
 TAIBAH INTERNATIONAL AID :  
 ASSOCIATION; ISLAMIC AFRICAN :  
 RELIEF AGENCY; TARIK HAMDI; :  
 FAZEH AHED; SANABIL AL-KHAIR; :  
 SANA-BELL, INC.; SANABEL AL- :  
 KHEER, INC.; KHALED NOURI; :  
 ABDULLAH M. AL-MAHDI; TAREQ M. :  
 AL-SWAIDAN; ABDUL AL-MOSLAH; :  
 SALAH BADAHDH; HASSAN A.A. :  
 BAHFZALLAH; M. YAQUB MIRZA; :  
 IHAB ALI; SAMIR SALAH; IBRAHIM :  
 HASSABELLA; HISHAM AL-TALIB; :  
 AHMED TOTONJI; IQBAL YUNUS; M. :  
 OMAR ASHRAF; MOHAMMED :  
 JAGHLIT; MUHAMMAD ASHRAF; :  
 SHERIF SEDKY; AFRICAN MUSLIM :  
 AGENCY; ARADI, INC.; GROVE :  
 CORPORATE, INC.; HERITAGE :  
 EDUCATION TRUST; MENA :  
 CORPORATION; RESTON :  
 INVESTMENTS, INC.; SAFA TRUST; :  
 STERLING CHARITABLE GIFT FUND; :  
 STERLING MANAGEMENT GROUP; :  
 YORK FOUNDATION; NATIONAL :  
 DEVELOPMENT BANK; DALLAH :  
 AVCO TRANS ARABIA CO. LTD.; :  
 OMAR AL BAYOUMI A/K/A ABU :  
 IMARD; MASJED AL MADINAH AL :  
 MUNAWARAH A/K/A MASJID AL :  
 MADINAH AL MUNAWARAH; AQSA :  
 ISLAMIC BANK; AQEEL AL-AQEEL; :  
 MANSOURI AL-KADI; SOLIMAN H.S. :  
 AL-BUTHE; PEROUZ SEDA GHATY; :  
 ADEL MUHAMMAD SADIQ BIN :  
 KAZEM; SAUDI AMERICAN BANK; :  
 ZEINAB MANSOUR-FATTOUH; :

MOHAMMED CHEHADE; HAZEM :  
 RAGAB; MUSTAFA AL-KADIR; ABU :  
 AL-MAID; AL SHAMAL ISLAMIC :  
 BANK A/K/A SHAMEL BANK A/K/A :  
 BANK EL SHAMAR; SULAIMAN AL- :  
 ALI; KHALED NOURI; MUSLIM :  
 WORLD LEAGUE OFFICES; :  
 ABDULLAH BIN SALEH AL-OBAID; :  
 TAHA JABER AL-ALWANI; :  
 INTERNATIONAL INSTITUTE OF :  
 ISLAMIC THOUGHT; IBRAHIM S. :  
 ABDULLAH; DR. MAHMOUD :  
 DAKHIL; MOHAMMED AL FAISAL AL :  
 SAUD; ABDUL RAHMAN AL :  
 SWAILEM; ARAB BANK, PLC; DUBAI :  
 ISLAMIC BANK; NADA :  
 MANAGEMENT ORGANIZATION, SA; :  
 GHASOUB AL ABRASH; MUSTAF :  
 AHMED AL-HISAWI A/K/A SHEIK :  
 SAEED; IMAD EDDIN BARAKAT :  
 YARKAS A/K/A ABU DAHDAH; :  
 MUHAMMED GALEB KALAJE :  
 ZUOYADI A/K/A ABU TALHA; :  
 BASSAM DALATI SATUT; :  
 ABDALRAHMAN ALARNOUT ABU :  
 ALJER A/K/A ABU OBED; :  
 MOHAMMED KHAIR AL SAQQA :  
 A/K/A ABU AL DARDA; GHASOUB AL :  
 ABRASH GHALYOUN A/K/A ABU :  
 MUSAB; ABU QATADA AL-FILISTINI :  
 A/K/A ABU ISMAIL A/K/A ABU UMAR :  
 A/K/A ABU OMAR OMAR A/K/A ABU :  
 UMAR TAKFIRI A/K/A ABU UMAR :  
 UMAR A/K/A ALI-SAMMAN UTHMAN :  
 A/K/A OMAR MAHMOUD UTHMAN :  
 A/K/A UMAR UTHMAN; YASSIR AL- :  
 SIRRI A/K/A AMMAR; MOHAMMED :  
 AL MASSARI; ZIYAD KHALEEL; ABU :  
 ZUBAYDAH; MAMDOUH MAHMUD :  
 SALIM A/K/A ABU HAJER AL IRAQI; :  
 ABDULLAH SAMIL BAHMADAN; :  
 ESSAM AL RIDI; OMAR ABU OMAR; :  
 MOHAMMED ALI HASAN AL :  
 MOAYAD; AL FAROOQ MOSQUE; :  
 YOUSEF JAMEEL; IBRAHIM :  
 MUHAMMED AFANDI; :

ABDULRAHMAN HASSAN :  
 SHARBATLY; MOHAMMED AL-ISSAI; :  
 ABU RIDA AL SURI A/K/A :  
 MOHAMMED LOAY BAYAZID; SAUDI :  
 RED CRESCENT; AHMED BRAHIM; :  
 ABU MUSAB AL-ZARQAWI; ABU :  
 IBRAHIM AL-MASRI; DAR AL MAAL :  
 AL ISLAMI TRUST; DMI :  
 ADMINISTRATIVE SERVICES, S.A.; :  
 SALMAN AL-OUUDA; SAFAR AL- :  
 HAWALI; SALEH AL-HUSSAYEN; :  
 SAMI OMAR AL-HUSSAYEN; :  
 MUHAMMED J. FAKIHI; QUEEN CITY :  
 CIGARETTES AND CANDY; AGUS :  
 BUDIMAN; AL-BARAKA BANKCORP, :  
 INC.; AHMED RESSAM; SAID BHAJJI; :  
 ZAKARIYA ESSABAR; AND SAUDI :  
 COMMITTEE FOR RELIEF AND :  
 CHARITY WORK ABROAD :

Defendants

The above-captioned plaintiffs, by and through their attorneys, Cozen O’Connor, complaining of the above-captioned defendants, do hereby allege the following:

**I. PARTIES**

1. Plaintiff, Federal Insurance Company (“Federal”), is a corporation organized and existing under the laws of the State of Indiana, with a principal place of business located at 15 Mountain View Road, Warren, New Jersey 07059. At all times material hereto, Federal was engaged in the business of issuing policies of insurance.

2. Plaintiff, Pacific Indemnity Company (“Pacific”), is a corporation organized and existing under the laws of the State of Wisconsin, with a principal place of business located at 330 East Kilbourne Avenue, Suite 1450, Milwaukee, Wisconsin



53202. At all times material hereto, Pacific was engaged in the business of issuing policies of insurance.

3. Plaintiff, Chubb Custom Insurance Company (“Chubb Custom”), is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business located at 15 Mountain View Road, Warren, New Jersey 07059. At all times material hereto, Chubb Custom was engaged in the business of issuing policies of insurance.

4. Plaintiff, Chubb Indemnity Insurance Company (“Chubb Indemnity”), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 55 Water Street, New York, New York 10041. At all times material hereto, Chubb Indemnity was engaged in the business of issuing policies of insurance.

5. Plaintiff, Chubb Insurance Company of Canada (“CICC”), is a corporation organized and existing under the laws of the Province of Ontario, Canada, with a principal place of business located at One Financial Plaza, One Adelaide Street East, Floor 16, Toronto, M5C 2V9 Ontario, Canada. At all times material hereto, CICC was engaged in the business of issuing policies of insurance.

6. Plaintiff, Chubb Insurance Company of New Jersey (“CICNJ”), is a corporation organized and existing under the laws of the State of New Jersey, with a principal place of business located at 15 Mountain View Road, Warren, New Jersey 07059. At all times material hereto, CICNJ was engaged in the business of issuing policies of insurance.

7. Plaintiff, Great Northern Insurance Company (“Great Northern”), is a corporation organized and existing under the laws of the State of Minnesota, with a

principal place of business located at 1000 Pillsbury Center, Minneapolis, Minnesota 55402. At all times material hereto, Great Northern was engaged in the business of issuing policies of insurance.

8. Plaintiff, Vigilant Insurance Company (“Vigilant”), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 55 Water Street, New York, New York 10038. At all times material hereto, Vigilant was engaged in the business of issuing policies of insurance.

9. Plaintiff, Zurich American Insurance Company (“Zurich”), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Zurich was engaged in the business of issuing policies of insurance.

10. Plaintiff, American Guarantee and Liability Insurance Company (“American Guarantee”), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, American Guarantee was engaged in the business of issuing policies of insurance.

11. Plaintiff, American Zurich Insurance Company (“American Zurich”), is a corporation organized and existing under the laws of the State of Illinois, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, American Zurich was engaged in the business of issuing policies of insurance.

12. Plaintiff, Assurance Company of America (“Assurance of America”), is a corporation organized and existing under the laws of the State of New York, with a

principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Assurance of America was engaged in the business of issuing policies of insurance.

13. Plaintiff, Colonial American Casualty and Surety Insurance Company (“Colonial American”), is a corporation organized and existing under the laws of the State of Maryland, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Colonial American was engaged in the business of issuing policies of insurance.

14. Plaintiff, Fidelity and Deposit Company of Maryland (“Fidelity”), is a corporation organized and existing under the laws of the State of Maryland, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Fidelity was engaged in the business of issuing policies of insurance.

15. Plaintiff, Maryland Casualty Company (“Maryland”), is a corporation organized and existing under the laws of the State of Maryland, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Maryland was engaged in the business of issuing policies of insurance.

16. Plaintiff, Northern Insurance Company of New York (“Northern”), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Northern was engaged in the business of issuing policies of insurance.

17. Plaintiff, Steadfast Insurance Company (“Steadfast”), is a corporation organized and existing under the laws of the State of Delaware, with a principal place of

business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Steadfast was engaged in the business of issuing policies of insurance.

18. Plaintiff, Valiant Insurance Company (“Valiant”), is a corporation organized and existing under the laws of the State of Iowa, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Valiant was engaged in the business of issuing policies of insurance.

19. Plaintiff, One Beacon Insurance Company (“One Beacon”), is a corporation organized and existing under the laws of the Commonwealth of Massachusetts, with a principal place of business located at One Beacon Street, Boston, Massachusetts 02108. At all times material hereto, One Beacon was engaged in the business of issuing policies of insurance.

20. Plaintiff, One Beacon America Insurance Company (“One Beacon America”), is a corporation organized and existing under the laws of the Commonwealth of Massachusetts, with a principal place of business located at One Beacon Street, Boston, Massachusetts 02108. At all times material hereto, One Beacon America was engaged in the business of issuing policies of insurance.

21. Plaintiff, American Employers’ Insurance Company (“American Employers”), is a corporation organized and existing under the laws of the Commonwealth of Massachusetts, with a principal place of business located at One Beacon Street, Boston, Massachusetts 02108. At all times material hereto, American Employers was engaged in the business of issuing policies of insurance.

22. Plaintiff, The Camden Fire Insurance Association (“Camden”), is a corporation organized and existing under the laws of the State of New Jersey, with a principal place of business located at One Beacon Street, Boston, Massachusetts 02108.

At all times material hereto, Camden was engaged in the business of issuing policies of insurance.

23. Plaintiff, Homeland Insurance Company of New York (“Homeland”), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at One Beacon Street, Boston, Massachusetts 02108. At all times material hereto, Homeland was engaged in the business of issuing policies of insurance.

24. Plaintiff, Crum & Forster Indemnity Company (“Crum & Forster”), is a corporation organized and existing under the laws of the State of New Jersey, with a principal place of business located at 305 Madison Avenue, Morristown, New Jersey 07960. At all times material hereto, Crum & Forster was engaged in the business of issuing policies of insurance.

25. Plaintiff, North River Insurance Company (“North River”), is a corporation organized and existing under the laws of the State of New Jersey, with a principal place of business located at 305 Madison Avenue, Morristown, New Jersey 07960. At all times material hereto, North River was engaged in the business of issuing policies of insurance.

26. Plaintiff, United States Fire Insurance Company (“United States Fire”), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 395 Madison Avenue, Morristown, New Jersey 07960. At all time material hereto, United States Fire was engaged in the business of issuing policies of insurance.

27. Plaintiff, American Alternative Insurance Corporation (“American Alternative”), is a corporation organized and existing under the laws of the State of

Delaware, with a principal place of business located at 555 College Road East, Princeton, New Jersey 08543. At all times material hereto, American Alternative was engaged in the business of issuing policies of insurance.

28. Plaintiff, Great Lakes Resinsurance U.K. PLC (“Great Lakes”), is a corporation organized and existing under the laws of the United Kingdom, with a principal place of business located at 1 Minster Court, Mincing Lane, London, England EC3R 7YH. At all times material hereto, Great Lakes was engaged in the business of issuing policies of insurance.

29. Plaintiff, The Princeton Excess & Surplus Lines Insurance Company (“Princeton Excess”), is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business located at 555 College Road East, Princeton, New Jersey 08543. At all times material hereto, Princeton Excess was engaged in the business of issuing policies of insurance.

30. Plaintiff, Amlin Underwriting Limited (“Amlin”), is a corporation organized and existing under the laws of the United Kingdom, with a principal place of business located at 1 St. Helen’s, 1 Undershaft, London, EC3A 8ND, England. At all times material hereto, Amlin was engaged in the business of issuing policies of insurance.

31. Plaintiff, Hiscox Dedicated Corporate Member Ltd. (“Hiscox”) is a corporation organized and existing under the laws of the United Kingdom, with a principal place of business located at 1 Great St. Helen’s, London, EC3A 6HX, England. At all times material hereto, Hiscox was engaged in the business of issuing policies of insurance.

32. Plaintiff, Allstate Insurance Company (“Allstate”), is a corporation organized and existing under the laws of the state of Illinois, with a principal place of

business located at 3075 Sanders Road, Northbrook, IL 60062. At all times material hereto, Allstate was engaged in the business of issuing policies of insurance.

33. Plaintiff, Boston Old Colony Insurance Company (“Old Colony”), is a corporation organized and existing under the laws of the commonwealth of Massachusetts, with a principal place of business located at CNA Plaza, Chicago, Illinois 60685. At all times material hereto, Old Colony was engaged in the business of issuing policies of insurance.

34. Plaintiff, Continental Insurance Company (“Continental Insurance”), is a corporation organized and existing under the laws of the state of New Hampshire, with a principal place of business located at CNA Plaza, Chicago, Illinois 60685. At all times material hereto, Continental Insurance was engaged in the business of issuing policies of insurance.

35. Plaintiff, Commercial Insurance Company of Newark, NJ, is a corporation organized and existing under the laws of the state of New Jersey, with a principal place of business located at CNA Plaza, Chicago, Illinois 60685. At all times material hereto, Commercial Insurance Company of Newark, NJ was engaged in the business of issuing policies of insurance.

36. Plaintiff, CNA Casualty of California (“CNA Casualty”), is a corporation organized and existing under the laws of the state of California, with a principal place of business located at CNA Plaza, Chicago, Illinois 60685. At all times material hereto, CNA Casualty of California was engaged in the business of issuing policies of insurance.

37. Plaintiff, Continental Insurance Company of New Jersey, is a corporation organized and existing under the laws of the state of New Jersey, with a principal place of business located at CNA Plaza, Chicago, Illinois 60685. At all times material hereto,

Continental Insurance Company of New Jersey was engaged in the business of issuing policies of insurance.

38. Plaintiff, Fidelity and Casualty Company of New York, is a corporation organized and existing under the laws of the state of New Hampshire, with a principal place of business located at CNA Plaza, Chicago, Illinois 60685. At all times material hereto, Fidelity and Casualty Company of New York was engaged in the business of issuing policies of insurance.

39. Plaintiff, Glens Falls Insurance Company (“Glens Falls”), is a corporation organized and existing under the laws of the state of Delaware, with a principal place of business located at CNA Plaza, Chicago, Illinois 60685. At all times material hereto, Glens Falls was engaged in the business of issuing policies of insurance.

40. Plaintiff, National Ben Franklin Insurance Company of Illinois (“Ben Franklin”), is a corporation organized and existing under the laws of the state of Illinois, with a principal place of business located at CNA Plaza, Chicago, Illinois 60685. At all times material hereto, Ben Franklin was engaged in the business of issuing policies of insurance.

41. Plaintiff Seneca Insurance Company, Inc. (“Seneca”), is a corporation organized and existing under the laws of the state of New York, with a principal place of business located at 160 Water Street, New York, NY 10038. At all times material hereto, Seneca was engaged in the business of issuing policies of insurance.<sup>1</sup>

42. Defendant, al Qaida, is a designated Foreign Terrorist Organization (“FTO”), pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Established by defendant

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<sup>1</sup> Additional plaintiffs previously identified in accordance with Paragraph 12 of Case Management Order #2 are listed in the pleadings attached hereto as Exhibits 1, 2, 3 and 4, all of which are incorporated herein by reference.



Osama bin Laden in the late 1980's, al Qaida is a global network of several thousand terrorist cells, members, associates and supporters, dedicated to the establishment of a pan-Islamic Caliphate throughout the world. The network's strength is reinforced by its ties to other FTOs, extremist organizations and sympathetic individuals and State Sponsors. Al Qaida frequently functions through, in concert with, or with the support of, the terrorist organizations and groups that operate under its umbrella or with its support. In February 1998, al Qaida issued a *fatwa* under the banner "the World Islamic Front for Jihad Against Jews and Crusaders," saying it was the duty of all Muslims to kill United States citizens - civilian or military - and their allies everywhere.

43. Defendant, Egyptian Islamic Jihad, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Egyptian Islamic Jihad operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida. Ayman al-Zawahiri, a prominent leader of Egyptian Islamic Jihad, has served as a member of al Qaida's leadership council, known as the *shura*, since al Qaida's inception. According to the United States government, Egyptian Islamic Jihad merged with al Qaida at some point prior to June 2001, but retains the capacity to commit acts of international terrorism independently.

44. Defendant, Asbat al-Ansar, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Asbat al-Ansar operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

45. Defendant, Al Gama'a al-Islamiyya, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and

Effective Death Penalty Act of 1996. Al Gama'a al-Islamiyya operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida. A senior official of Al Gama'a al-Islamiyya signed al Qaida's February 1998 *fatwa* calling for attacks against the United States.

46. Defendant, Salafist Group for Call and Combat, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Salafist Group for Call and Combat operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

47. Defendant, Lashkar I Janghvi, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Lashkar I Janghvi operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

48. Defendant, Lashkar-e Tayyiba, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Lashkar-e-Tayyiba operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

49. Defendant, Jemaah Islamiya Organization, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Jemaah Islamiya Organization operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

50. Defendant, Hezbollah, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death

Penalty Act of 1996. Hezbollah operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida. The relationship between Hezbollah and al Qaida was forged during meetings between Osama bin Laden and Imad Mughniyah, Hezbollah's chief of operations, and has included coordination on explosives and tactics training, money laundering, weapons smuggling and acquisition of forged identification documents. According to United States intelligence officials, Hezbollah operates under the direction, and by virtue of the direct license, of the Iranian and Syrian governments. Hezbollah is, in effect, an agency and instrumentality of the Iranian and Syrian governments.

51. Defendant, Abu Sayef Group, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Abu Sayef Group operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

52. Defendant, Algerian Armed Islamic Group a/k/a GIA, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Algerian Armed Islamic Group operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

53. Defendant, HAMAS, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. HAMAS operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

54. Defendant, Palestine Islamic Jihad, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective

Death Penalty Act of 1996. Palestine Islamic Jihad operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

55. Defendant, The Islamic Republic of Iran (“Iran”), is a foreign state within the meaning of 28 U.S.C. §1391(f), and a designated State Sponsor of terrorism pursuant to the Export Administration Act of 1979 and the Foreign Assistance Act of 1961.

56. Defendant Iran has long provided material support and resources to al Qaida, as further described herein.

57. Defendant, Republic of Iraq (“Iraq”), is a foreign state within the meaning of 28 U.S.C. §1391(f), and a designated State Sponsor of terrorism pursuant to the Export Administration Act of 1979 and the Foreign Assistance Act of 1961.

58. Defendant Iraq has long provided material support and resources to al Qaida, including training in document forgery, bomb making and poison and gas production, as further described herein.

59. Defendant, The Republic of Sudan (“Sudan”), is a foreign state within the meaning of 28 U.S.C. §1391(f), and a designated State Sponsor of terrorism pursuant to the Export Administration Act of 1979 and the Foreign Assistance Act of 1961. Sudan maintains an Embassy within the United States at 2210 Massachusetts Avenue, N.W., Washington, D.C. 20008-2831.

60. Defendant Sudan has long provided material support and resources to al Qaida. According to the United States government, Sudan’s support of al Qaida has included para-military training, indoctrination, money, travel documentation, safe passage and refuge in Sudan, as further described herein.

61. Defendant, Syrian Arab Republic (“Syria”), is a foreign state within the meaning of 28 U.S.C. §1391(f), and a designated State Sponsor of terrorism pursuant to the Export Administration Act of 1979 and the Foreign Assistance Act of 1961.

62. Defendant Syria has long provided material support and resources to al Qaida, as further described herein.

63. Defendant, Kingdom of Saudi Arabia (“Saudi Arabia”), is a foreign state within the meaning of 28 U.S.C. §1391(f). Saudi Arabia maintains an Embassy within the United States at 601 New Hampshire Avenue, N.W., Washington, D.C. 20037.

64. Defendant Saudi Arabia has long provided material support and resources to al Qaida, including massive financial and logistical assistance, as further described herein.

65. Defendants, Osama bin Laden; Muhammad Atif a/k/a Subhi Sitta a/k/a Abu Hafs al-Masri; Sayf al-Adl; Abu Hafs the Mauritanian a/k/a Mahfouz Ould al-Walid a/k/a Khalid al-Shanqiti; Ibn al-Shaykh al-Libi; Abu Zubaydah a/k/a Zayn al Abidin Muhammad Husayn Tariq; Abd al-Hadi al-Iraqi a/k/a Abu Abdullah; Ayman al-Zawahiri; Thirwat Salah Shihata a/k/a Muhammad Ali; Tariq Anwar al-Sayyid Ahmad a/k/a Fathi a/k/a Amr al-Fatih; Muhammad Salah a/k/a Nasr Fahmi Nasr Hasanayn; Makhtab al-Khidamat a/k/a Al-Khifaf; Al-Itihaad al-Islamiya (AIAI); Islamic Army of Aden; Wafa Humanitarian Organization; Al-Rashid Trust; Mamoun Darkazanli Import-Export Company; Nurjaman Riduan Ismuddin a/k/a Hambali; Mohammed Iqbal Abdurrahman a/k/a/ Abu Jibril; Benevolence International Foundation; Benevolence International Fund; Bosanska Idealna Futura; Global Relief Foundation a/k/a Foundation Secours Mondial; Mounir El Motassadeq; Ramzi Binalshibh; Zakarya Essabar; Said Bahaji; Turkistan Islamic Movement; Wa’el Hamza Julaidan a/k/a Al-Hasan al Madani;

Adel Ben Soltane; Nabil Benattia; Yassine Chekkouri; Riadh Jelassi; Mendi Kammoun; Samir Kishk; Tarek Ben Habib Maaroufi; Abdelhalim Remadna; Mansour Thaer; Lazhar Ben Mohammed Tlili; Habib Waddani; Akida Bank Private Limited; Akida Investment Co. Ltd.; Nasreddin Group International Holding Ltd.; Nasco Nasreddin Holding A.S.; Nascotex S.A.; Nasreddin Foundation; BA Taqwa for Commerce and Real Estate Company Ltd.; 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 Nassneddin EC; Nada International Anstalt; Nasreddin International Group Limited Holding; The Aid Organization of the Ulema; Ahmed Idris Nasreddin; Youssef Nada; Abdelkadir Mahmoud Es Sayed; Khalid Al-Fawaz; Abu Hamza Al-Masri; Mohamed Ben Belgacem Aouadi; Mokhtar Boughougha; Tarek Charaabi; Sami Ben Khemais ESSID; Lased Ben Heni; Somalia Branch of the Al-Haramain Islamic Foundation; Bosnia-Herzegovina branch of Al-Haramain Islamic Foundation; Umma Tameer-E-Nau (UTN); Bashir-Ud-Din Mahmood; Abdul Majeed; S.M. Tufail; Al-Barakaat; Al Taqwa/Nada Group; Aaran Money Wire Service, Inc.; Al Baraka Exchange LLC; Al Barakaat Bank; Al-Barakat Bank of Somalia (BSS); Al-Barakat Finance Group; Al-Barakat Financial Holding Co.; Al-Barakat Global Telecommunications; Al-Barakat Group of Companies Somalia Limited; Al-Barakat International a/k/a Baraco Co; Al-Barakat Investments; Al-Barakat Wiring Service; Al Taqwa Trade, Property and Industry Company Limited; ASAT Trust;<sup>2</sup> Bank al Taqwa Limited; Baraka Trading Company; Barakaat Boston; Barakaat Construction Company; Barakaat Enterprise; Barakaat Group of Companies; Barakaat International; Barakaat International Foundation; Barakaat International, Inc.; Barakaat North America, Inc.;

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<sup>2</sup> Additional factual allegations relating to Asat Trust's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 5, which is incorporated herein by reference.

Barakaat Red Sea Telecommunications; Barakaat Telecommunications Co. Somalia;  
Barakat Bank and Remittances; Barakat Computer Consulting (BCC); Barakat  
Consulting Group (BCG); Barakat Global Telephone Company; Barakat International  
Companies (BICO); Barakat Post Express (BPE); Barakat Refreshment Company;  
Barakat Wire Transfer Company; Barakat Telecommunications Company Limited  
(BTELCO); Barako Trading Company, LLC; Global Services International; Heyatul  
Ulya; Nada Management Organization; Parka Trading Company; Red Sea Barakat  
Company Limited; Somalia International Relief Organization; Somalia Internet  
Company; Somalia Network AB; Youssef M. Nada & Co. Gesellschaft MBH; Youssef  
M. Nada; Hussein Mahmud Abdulkadir; Abdirasik Aden; Abbas Abdi Ali; Abdi  
Adulaziz Ali; Yusaf Ahmed Ali; Dahir Ubeidullahi Aweys; Hassan Dahir Aweys; Ali  
Ghaleb Himmat; Albert Fredrich Armand Huber; Liban Hussein; Abdullahi Hussein  
Kahie; Mohammed Mansour; Zeinab Mansour-Fattah; Abdullah Ahmed Abdullah a/k/a  
Abu Mariam a/k/a Abu Mohamed Al-Masri a/k/a Saleh; Haji Abdul Manan Agha a/k/a  
Abd Al-Man'am Saiyid; Al-Hamati Sweets Bakeries; Muhammad Al-Hamati a/k/a  
Mohammad Hamdi Sadiq Al-Ahdal a/k/a Abu Asim Al-Makki; Amin Al-Haq a/k/a Dr.  
Amin Ah Haq a/k/a Muhammad Amin a/k/a Dr. Amin Ul-Haq; Saqar Al-Sadawi; Ahmad  
Sa'Id Al-Kadr a/k/a Abu Abd Al-Rahman Al-Kanadi; Anas Al-Liby a/k/a Anas Al-Libi  
a/k/a Nazim Al-Raghie a/k/a Nazih Abdul Hamed Al-Raghie a/k/a Anas Al-Sabai;  
Ahmad Ibrahim Al- Mughassil a/k/a Abu Omran a/k/a Ahmed Ibrahim Al-Mughassil;  
Abdelkarim Hussein Mohamed Al-Nasser; Al-Nur Honey Press Shops a/k/a Al-Nur  
Honey Center; Yasin Al-Qadi a/k/a Shaykh Yassin Abdullah Kadi a/k/a Yasin Kahdi;  
Sa'D Al-Sharif; Al-Shifa' Honey Press for Industry and Commerce; Ibrahim Salih  
Mohammed Al-Yacoub; Ahmed Mohammed Hamed Ali a/k/a Ahmed Mohammed

Abdurehman a/k/a Abu Fatima a/k/a Abu Islam a/k/a Abu Khadijah a/k/a Ahmed Hamed a/k/a Ahmed the Egyptian a/k/a Ahmed Ahmed a/k/a Ahamad Al-Masri a/k/a Abu Islam Al-Surir a/k/a Ahmed Mohammed Ali a/k/a Hamed Ali a/k/a Ahmed Hemed a/k/a Ahmed Shieb a/k/a Shuaib; Ali Atwa a/k/a Ammar Mansour Bouslim a/k/a Hassan Rostom Salim; Muhsin Musa Matwalli Atwah a/k/a Abdel Rahman a/k/a Abdul Rahman a/k/a Abdul Rahman Al-Muhajir a/k/a Mohammed K.A. Al-Namer; Bilal Bin Marwan; Ayadi Chafiq Bin Muhammad a/k/a Ben Muhammad Aiadi a/k/a Ben Muhammad Aiady a/k/a Ben Muhammad Ayadi Chafik a/k/a Ben Muhammad Ayadi Shafiq; Mamoun Darkazanli; Ali Saed Bin Ali El-Hoorie a/k/a Ali Saed Bin Ali Al-Houri a/k/a Ali Saed Bin Ali El-Houri; Mustafa Mohamed Fadhil a/k/a Abd Al Wakil Al Masri a/k/a Abu Al-Nubi a/k/a Hassan Ali a/k/a Abu Anis a/k/a Moustafa Ali Elbishy a/k/a Mustafa Muhamad Fadil a/k/a Mustafa Fazul a/k/a Hussein a/k/a Abu Jihad a/k/a Khalid a/k/a Nu Man a/k/a Mustafa Mohammed a/k/a Abu Yussrr; Ahmed Khalfan Ghailani a/k/a Ahmed the Tanzanian a/k/a Foopie a/k/a Fupi a/k/a Abu Bakr Ahmad a/k/a A. Ahmed a/k/a Abubakar Ahrmed a/k/a Abubakar K. Ahmed a/k/a Abubakar Khalfan Ahmed a/k/a Abubakary K. Ahmed a/k/a Ahmed Khalfan Ahmed a/k/a Ahmad Al Tanzani a/k/a Ahmed Khalfan Ali a/k/a Abu Bakr a/k/a Abubakary Khalfan Ahmed Ghailani a/k/a Ammed Ghailani a/k/a Ahmad Khalafan Ghilani a/k/a Mahafudh Abubakar Ahmed Abdallah Hussein a/k/a Abu Khabar a/k/a Ahmed Khalfan a/k/a Shariff Omar Mohammed; Riad Hijazi a/k/a Abu-Ahmad Al-Amriki a/k/a Abu-Ahmad Al-Hawen a/k/a Rashid Al-Maghribi a/k/a Abu-Ahmad Al-Shahid a/k/a M Raed Hijazi; Hasan Izz-Al-Din a/k/a Ahmed Garbaya a/k/a Sa-Id a/k/a Samir Salwwan; Jaish-I-Mohammed a/k/a Army of Mohammed; Jam'Yah Ta'Awun Al-Islamia a/k/a Jam'Iyat Al Ta'Awun Al Islamiyya a/k/a JIT a/k/a Society of Islamic Cooperation; Mufti Rashid Ahmad Ladehyanoy a/k/a



Mufti Rasheed Ahma a/k/a Mufti Rashid Ahmad Ludhianvi a/k/a Mufti Rashid Ahmad Wadehyanoy; Fazul Abdullah Mohammed a/k/a Fazul Abdalla a/k/a Fazul Adballah a/k/a Abu Aisha a/k/a Abu Seif Al Sudani a/k/a Fadel Abdallah Mohammed Ali a/k/a Abdalla Fazul a/k/a Abdallah Fazul a/k/a Abdallah Mohammed Fazul a/k/a Haroon Fazul a/k/a Harun Fazul a/k/a Haroon a/k/a Fadhil Haroun a/k/a Harun a/k/a Abu Luqman a/k/a Fazul Mohammed a/k/a Fazul Abdilahi Mohammed a/k/a Fouad Mohammed a/k/a Fadil Abdallah Muhamad; Khalid Shaikh Mohammed a/k/a Salem Ali a/k/a Fahd Bin Abdallah Bin Khalid a/k/a Ashraf Refaat Nabith Henin a/k/a Khalid Abdul Wadood; Fahid Mohammed Ally Msalam a/k/a Usama Al-Kini a/k/a Fahid Mohammed Ally a/k/a Fahad Ally Msalam a/k/a Fahid Mohammed Ali Msalam a/k/a Mohammed Ally Msalam a/k/a Fahid Mohammed Ali Musalaam a/k/a Fahid Muhamad Ali Salem; RabitaTrust; Ansar al-Islam (AI) a/k/a Jund al-Islam; Youssef Abdaoui a/k/a Abu Abdullah a/k/a Abdallah a/k/a Abdullah; Mohammed Amine Akli a/k/a Samir a/k/a Kali Sami a/k/a Elias; Mohrez Amdouni a/k/a Fabio Fusco a/k/a Mohammed Hassan a/k/a Tuale Abu; Chiheb Ben Mohamed Ayari a/k/a Abu Hohem Hichem; Mondher Baazaoui a/k/a Hamza; Lionel Dumont a/k/a Bilal a/k/a Hamza a/k/a Jacques Brougere; Moussa Ben Amor Essaadi a/k/a Dah Dah a/k/a Abdelrahmman a/k/a Bechir; Rachid Fehar a/k/a Aminedel Belgio a/k/a Djaffar; Brahim Ben Hedili Hamami; Khalil Jarraya a/k/a Khalil Yarraya a/k/a Aziz Ben Narvan Abdel' a/k/a Amro a/k/a Omar a/k/a Amrou a/k/a Amr; Mounir Ben Habib Jerraya a/k/a Yarraya; Fouzi Jendoubi a/k/a Said a/k/a Samir; Fethi Ben Rebai Masri a/k/a Amor a/k/a Omar Abu a/k/a Fethi Alic; Najib Ouaz; Ahmed Hasni Rarrbo a/k/a Abdallah a/k/a Abdullah; Nedal Saleh a/k/a Hitem; Abdelghani Mzoudi; Gulbuddin Hekmatyar; Imad Mughniyeh; Muhammad Omar; Islamic International Brigade; Special Purpose Islamic Regiment; and Riyadus-Salikhin Recognizance and Sabotage Battalion

of Chechen Martyrs, have been designated as supporters and associates of terrorists by the U.S. government, pursuant to Executive Order 13224, based on their material support and sponsorship of, or affiliation with, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons. The claims asserted against these defendants are predicated on the conduct and evidence underlying their designations by the U.S. government, and the additional grounds set forth herein.

66. Defendants Osama Bassnan; Omar Al-Bayoumi; Fahad Al-Thumairy; World Assembly of Muslim Youth; Sheikh Ahmed Salim Swedan; Muhammad Abu-Islam; Abdullah ‘Qassim; Hashim Abdulrahman; Jamal Al-Badawi; Mohammed Omar Al-Harazi; Walid Al-Sourouri; Fatha Adbul Rahman; Yasser Al-Azzani; Jamal Ba Khorsh; Ahmad Al-Shinni; Jamil Qasim Saeed; Mohamed Bayazid; Abu Musab Zarqawi; Sheikh Omar Bakri Muhammad; Abdul Fattah Zammar; Ghasoub Al Abrash Ghalyoun a/k/a Abu Musab; Bensayah Belkacem; Sabir Lamar; Wadih El-Hage; Wali Khan Amin Shah; Zacarias Moussaoui; The Taliban; Abdel Hussein; National Islamic Front; Hassan Turabi; Abd Al-Mushin Al-Libi; Abdul Rahman Khaled Bin Mahfouz; Abdul Rahman Yasin; Abdulla Al Obaid; Abdula Bin Laden; Advice and Reformation Committee; Afghan Support Committee; Al-Haramain a/k/a Al-Haramain Foundation; Enaam M. Arnanout; International Islamic Relief Organization; International Institute of Islamic Thought; Islamic Cultural Institute of Milan; Jamal Barzinji; Khaled Bin Mahfouz; Mohammed Jamal Khalifa; Muslim World League; National Commercial Bank; Prince Nayef Bin Abdulaziz Al Saud; Prince Sultan Bin Abdulaziz Al Saud; Rabih Haddah; SAAR Foundation; Saudi Sudanese Bank; Al Shamal Islamic Bank ;Sheikh Abu Bdul Aziz Nagi; Sheik Adil Galil Batargy a/k/a Adel Abdul Jalil Batterjee; Suleiman Abdel Aziz Al Rajhi; Taba Investments; Ulema Union of Afghanistan; Wadi Al Aqiq; Al-

Shaykh Al-Iraqi; Azzam Service Center; Abu Hajer Al Iraqi; Mohammed Al Faisal Al Saud; Al-Hijrah Construction and Development Limited; Gum Arabic Company Limited; Al Shamal For Investment and Development; Saleh Abdullah Kamel; Al Baraka Investment and Development; Saudi Dallah Al Baraka Group LLC; Al-Bir Saudi Organization; Mohammad S. Mohammad; Tadamon Islamic Bank; Mustasim Abdel-Rahim; Mohamed Sadeek Odeh; Mahdi Chamran Savehi; Mohammed Sarkawi; Al Tawhid; Haji Mohamad Akram; Abdallah Omar; Umar Faruq; Abd Al-Rahim Al-Nashiri; Turki Al Faisal Al Saud a/k/a Prince Turki; Prince Salman Bin Abdul Aziz Al Saud a/k/a Prince Salman; Zouaydi a/k/a Muhammed Galeb Kalaje Zoaydi a/k/a Abu Talha; Mullah Kakshar; Arafat El-Asahi; Mushayt for Trading Establishment; Abdullah Bin Abdul Muhsen Al Turki a/k/a Al Turki;<sup>3</sup> Saudi High Commission a/k/a The Saudi High Relief Commission; Abdul Aziz Al Ibrahim a/k/a Al Ibrahim;<sup>4</sup> Help African People; Ibrahim Bin Abdul Aziz Al Ibrahim Foundation;<sup>5</sup> Mercy International Relief Agency; Islamic Movement of Uzbekistan; Saudi Bin Laden Group; Bakr M. Bin Laden; Mohammed Bahareth; Tarek M. Bin Laden; Omar M. Bin Laden; Mohammed Bin Laden Organization; Yeslam M. Bin Laden;<sup>6</sup> Global Diamond Resource; Human Concern International Society; Talal Mohammed Badkook; Dr. Mohaman Ali Elgari; New Diamond Holdings; Al-Rajhi Banking & Investment Corporation; Saleh Abdulaziz Al-Rajhi; Abdullah Sulaiman Al-Rajhi; Mar-Jac Poultry; Mar-Jac Investments, Inc.; Piedmont Poultry; Salim Bin Mahfouz; Red Crescent Saudi Committee; Blessed Relief

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<sup>3</sup> Additional factual allegations relating to Abdullah al Turki's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 6, which is incorporated herein by reference.

<sup>4</sup> Additional factual allegations relating to Abdul Aziz al Ibrahim's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 7, which is incorporated herein by reference.

<sup>5</sup> Additional factual allegations relating to Ibrahim bin Abdul Aziz al Ibrahim Foundation's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 8, which is incorporated herein by reference.

<sup>6</sup> Additional factual allegations relating to Yeslam bin Laden's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 9, which is incorporated herein by reference.

Foundation; Abdulrahman Bin Khalid Bin Mahfouz; Al-Birr; Hisham; Hezb-e-Islami; Saif Al Islam El Masry; Syed Suleman Ahmer; Mazin M.H. Bahareth; Shahir Abdulraoof Batterjee;<sup>7</sup> Zahir H. Kazmi; Muzaffar Khan; Jamal Nyrabeh; Ahmad Ajaj; Success Foundation; Abdulrahman Alamoudi; American Muslim Foundation; Mohammed Omeish; Adnan Basha;<sup>8</sup> Mahmoud Jaballah; Arafat El-Ashi; Moro Islamic Liberation Front; Jamal Ahmed Mohammed; Mohammed Khatib; Saudi Joint Relief Committee; Taibah International Aid Association; Islamic African Relief Agency; Tarik Hamdi;<sup>9</sup> Fazez Ahed; Sanabil Al-Khair; Sana-Bell, Inc.; Sanabel Al-Kheer, Inc.; Khaled Nouri; Abdullah M. Al-Mahdi; Tareq M. Al-Swaidan; Abdul Al-Moslah; Salah Badahdh; Hassan A.A. Bahfzallah; M. Yaqub Mirza; Ihab Ali; Samir Salah; Ibrahim Hassabella; Hisham Al-Talib; Ahmed Totonji; Iqbal Yunus; M. Omar Ashraf; Mohammed Jaghlit; Muhammad Ashraf; Sherif Sedky; African Muslim Agency; Aradi, Inc.; Grove Corporate, Inc.; Heritage Education Trust; Mena Corporation; Reston Investments, Inc.; Safa Trust; Sterling Charitable Gift Fund; Sterling Management Group; York Foundation; National Development Bank; Dallah Avco Trans Arabia Co. Ltd.; Omar Al Bayoumi a/k/a Abu Imard; Masjed Al Madinah Al Munawarah a/k/a Masjid Al Madinah Al Munawarah; Aqsa Islamic Bank; Aqeel Al-Aqeel; Mansouri Al-Kadi; Soliman H.S. Al-Buthe; Perouz Seda Ghaty; Adel Muhammad Sadiq Bin Kazem; Saudi American Bank; Zeinab Mansour-Fattouh; Mohammed Chehade; Hazem Ragab; Mustafa Al-Kadir; Abu Al-Maid; Al Shamal Islamic Bank a/k/a Shamel Bank a/k/a Bank El Shamar; Sulaiman Al-Ali; Khaled Nouri; Muslim World League offices; Abdullah Bin saleh Al-

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<sup>7</sup> Additional factual allegations relating to Shahir Batterjee's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 10, which is incorporated herein by reference.

<sup>8</sup> Additional factual allegations relating to Adnan Basha's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 11, which is incorporated herein by reference.

<sup>9</sup> Additional factual allegations relating to Tarik Hamdi's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 12, which is incorporated herein by reference.

Obaid; Taha Jaber Al-Alwani; International Institute of Islamic Thought; Ibrahim S. Abdullah; Dr. Mahmoud Dakhil; Mohammed Al Faisal Al Saud; Abdul Rahman Al Swailem; Arab Bank, PLC; Dubai Islamic Bank; Nada Management Organization, SA; Ghasoub Al Abrash; Mustaf Ahmed Al-Hisawi a/k/a Sheik Saeed; Imad Eddin Barakat Yarkas a/k/a Abu Dahdah; Muhammed Galeb Kalaje Zuoyadi a/k/a Abu Talha; Bassam Dalati Satut; Abdalrahman Alarnout Abu Aljer a/k/a Abu obed; Mohammed Khair Al Saqqa a/k/a Abu Al Darda; Ghasoub Al Abrash Ghalyoun a/k/a Abu Musab; Abu Qatada Al-Filistini a/k/a Abu Ismail a/k/a Abu Umar a/k/a Abu Omar Omar a/k/a Abu Umar Takfiri a/k/a Abu Umar umar a/k/a Ali-Samman Uthman a/k/a Omar Mahmoud Uthman a/k/a Umar Uthman; Yassir Al-Sirri a/k/a Ammar; Mohammed Al Massari; Ziyad Khaleel; Abu Zubaydah; Mamdouh Mahmud Salim a/k/a Abu Hajer Al Iraqi; Abdullah Samil Bahmadan;<sup>10</sup> Essam Al Ridi; Omar Abu Omar; Mohammed Ali Hasan Al Moayad; Al Farooq Mosque; Yousef Jameel; Ibrahim Muhammed Afandi; Abdulrahman Hassan Sharbatly; Mohammed Al-Issai; Abu Rida Al Suri a/k/a Mohammed Loay Bayazid; Saudi Red Crescent; Ahmed Brahim; Abu Musab Al-Zarqawi; Abu Ibrahim Al-Masri; Dar Al Maal Al Islami Trust; DMI Administrative Services, S.A.; Salman Al-Ouda;<sup>11</sup> Safar Al-Hawali;<sup>12</sup> Saleh Al-Hussayen;<sup>13</sup> Sami Omar Al-Hussayen;<sup>14</sup> Muhammed J. Fakihi; Queen City Cigarettes and Candy; Agus Budiman; Al-Baraka Bankcorp, Inc.; Ahmed Ressam; Said Bahaji; Zakariya Essabar; and Saudi Committee for Relief and

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<sup>10</sup> Additional factual allegations relating to Abdullah Salim Bahmadan's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 13, which is incorporated herein by reference.

<sup>11</sup> Additional factual allegations relating to Salman Al-Ouda's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 14, which is incorporated herein by reference.

<sup>12</sup> Additional factual allegations relating to Safar Al-Hawali's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 14, which is incorporated herein by reference.

<sup>13</sup> Additional factual allegations relating to Saleh Al-Hussayen's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 15, which is incorporated herein by reference.

<sup>14</sup> Additional factual allegations relating to Sami Omar al-Hussayen's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 16, which is incorporated herein by reference.

Charity Work Abroad,<sup>15</sup> have aided and abetted, conspired with, and provided material support and resources to, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons, as described herein.

## **II. JURISDICTION**

67. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1332(a)(2) (diversity), and 28 U.S.C. § 1350 (Alien Tort Claims Act).

68. The jurisdiction of this Court over defendants Iran, Iraq, Sudan, Syria and Saudi Arabia is invoked pursuant to 28 U.S.C. § 1330, as the claims against those defendants fall within the exceptions to immunity set forth at 28 U.S.C. §§ 1605(a)(2), 1605(a)(5) and 1605(a)(7) (Foreign Sovereign Immunities Act).

69. Venue in this district is proper pursuant to § 408(b)(3) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, and 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1).

## **III. FACTUAL BACKGROUND**

70. On September 11, 2001, nineteen (19) members of the al Qaida terrorist network hijacked four (4) commercial airliners, and used those planes as weapons in a coordinated terrorist attack on the World Trade Center Complex in New York and the Pentagon in Arlington, Virginia (the “September 11<sup>th</sup> Attack”).

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<sup>15</sup> The claims against the Saudi Committee for Relief and Charity Work Abroad are predicated on the conduct of its predecessor in interest charities, including Al Haramain Islamic Foundation, Benvolence International Foundation, Waqf Foundation, Saudi Joint Relief Committee for Kosovo and Chechnya and Saudi High Commission for Bosnia and Herzegovina. Additional Factual allegations relating to the Saudi Committee for Relief and Charity Work Abroad’s status as successor in interest to those charities are set forth in the More Definite Statement attached hereto as Exhibit 17, which is incorporated herein by reference.