

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	<b>Criminal No. 1:16CR143</b>
	)	<b>The Honorable Liam O’Grady</b>
<b>MOHAMAD JAMAL KHWEIS,</b>	)	
	)	<b>Sentencing Date: 10/27/17</b>
<b>Defendant.</b>	)	

**DEFENDANT’S POSITION ON SENTENCING**

Pursuant to Rule 32 of the Federal Rules of Criminal Procedure, and Section 6A1.3 of the advisory United States Sentencing Guidelines, the Defendant, Mohamad Jamal Khweis (“Mr. Khweis”), by counsel, states that he has received and reviewed the Presentence Investigation Report (“PSR”). Mr. Khweis has one Guidelines objection and maintains the factual corrections outlined in the PSR addendum regarding the timing of the Kurdish investigation, as well as a general factual objection to the Government’s characterization of Mr. Khweis’ offense (¶¶19-29 of the PSR).

Mr. Khweis submits that a sentence no greater than 60 months incarceration is sufficient, but not greater than necessary, to comply with the purposes enunciated by Congress in 18 U.S.C. § 3553(a)(2). This is based on his background and character, need to avoid unwarranted sentencing disparities, the need to protect the public, and for general deterrence.

### GUIDELINES OBJECTION<sup>1</sup>

Mr. Khweis objects to the USSG § 3A1.4(a) “terrorism enhancement” because knowledge of a foreign terrorist organization’s mission when providing material support is insufficient, without more, for its application. *See United States v. Chandia*, 675 F.3d 329, 334 (4th Cir. 2012). In *Chandia*, the Fourth Circuit held that, when applying the terrorism enhancement, the District Court initially “applied the wrong legal standard by equating intent with knowledge.” *Id.* (citing *United States v. Chandia*, 395 F. App’x 53, 60 (4th Cir. 2010) (“*Chandia II*”). The court explained that the “[defendant’s] knowledge that [the Foreign Terrorist Organization] had a terrorist purpose supported his material support convictions but ‘that does not automatically yield an inference of the specific intent required for the terrorism enhancement to apply.’” *Id.* The Fourth Circuit indicated that the District Court must “explain how specific facts indicate that [the defendant’s] motive in providing material support constituted the requisite intent for the terrorism enhancement.” *Id.* (internal quotations omitted).

In this case, the Government’s theory that Mr. Khweis joined ISIS to become a fighter is seriously undermined given the recently recovered document that leaves this remark blank for Mr. Khweis (but states “fighter” for others). This is significant because the record is void of any other type of specific intent as to Mr. Khweis’ motive.<sup>2</sup> The record is notably missing any evidence of tweets, messages, or other social media in support of ISIS’ mission, or any admissions from the defendant that he agreed and sought

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<sup>1</sup> This objection was not raised with the probation officer or the Government until after the final PSR was filed. Nevertheless, upon further reflection, and in part based on the newly discovered document, Mr. Khweis raises this Guidelines Objection.

<sup>2</sup> Even if the evidence did not include the newly-discovered document, Mr. Khweis maintains he did not agree to be a fighter, or have knowledge of that entry on the form.

to adhere to ISIS ideology. In fact the testimony was the opposite. Mr. Khweis repeatedly denied agreeing with ISIS ideology, both to the agents when interviewed, and at trial. There was testimony that Mr. Khweis knew ISIS was a violent organization with a violent mission, however, that evidence goes to the material support charge itself. That evidence does not show that Mr. Khweis' "motivation in providing material support to [ISIS] was to 'to influence or affect government conduct by intimidation or coercion or to retaliate against government conduct.'" *Id.* at 340 (citing definition given to "a federal crime of terrorism" in 18 U.S.C. § 2332b(g)(5)(A)). Therefore, Mr. Khweis objects to the application of the terrorism enhancement, and submits the Guidelines calculation should be Offense Level 28, Criminal History Category I, resulting in a range of 78-97 months.

### **BACKGROUND**

Mr. Khweis is a 27-year-old high school graduate who lived almost his entire life with his mother, father, and brother in Virginia. Raised by his two parents in Fairfax County, by all accounts, Mr. Khweis' childhood was normal. He and his brother had the typical sibling squabbles, and, like most teens, at times he found his parents to be too strict, but overall, he had a positive upbringing. His parents were both Muslim Americans, having immigrated from Palestine and Jordan. The family was not particularly devout, however, and Mr. Khweis only occasionally attended religious services.

Mr. Khweis was a supportive and helpful son. Both of his parents worked, and he got his first job at age 14 working at an ice cream shop during the summers. At age fifteen, he began working as a server in a retirement home. From this young age up until

his travel, Mr. Khweis held numerous jobs including positions in a bank, hotel, and as a bus driver for disabled metro riders. His employers knew him to be polite and responsible. Mr. Khweis also engaged in volunteer activities. He assisted with an event to raise money for Crohn's disease, when he was employed by the bank, he spoke at elementary schools, sponsored "shred it" events, and helped with their involvement in the Fairfax parades.

Mr. Khweis always loved to travel. Early in life he traveled to Israel, Jordan, and Egypt with his mother. At age thirteen he again visited Jordan with his mother, and at age fifteen, the Khweis family traveled to Israel, Jordan, and Syria. Mr. Khweis enjoyed exploring on his own as well, traveling to New York and Colorado a few years later.

In high school, Mr. Khweis found himself slightly wayward. He began to associate with a tougher crowd of teenagers who smoked pot and drank. Mr. Khweis' grades faltered, and as he continued through high school he began to fall into the patterns of drinking and smoking with this new crowd. Prior to his travel in this case, Mr. Khweis' day-to-day routine could be described as unremarkable, or even mundane. He rose early to go to work, he worked his shift, then got off work and drank, smoked cigarettes and marijuana, and socialized with his friends. During this period, Mr. Khweis made the impulsive and poor decision to travel to ISIS-held territory. Unfortunately, the adventure quickly few out of control, and Mr. Khweis ultimately found himself before this Court facing his judgment.

## ARGUMENT

### **I. Legal Standard**

In *Kimbrough v. United States*, 128 S. Ct. 558 (2007), and *Gall v. United States*, 128 S. Ct. 586 (2007), the Supreme Court held that the Sentencing Guidelines are simply an advisory tool to be considered alongside other statutory considerations set forth in 18 U.S.C. § 3553(a). In two summary reversals, moreover, the Court stated unequivocally that the Guidelines cannot be used as a substitute for a sentencing court's independent determination of a just sentence based upon consideration of the statutory sentencing factors. *Nelson v. United States*, 129 S. Ct. 890 (2009); *Spears v. United States*, 129 S. Ct. 840 (2009). "Our cases do not allow a sentencing court to presume that a sentence within the applicable Guidelines range is reasonable," the Court held in *Nelson*. 129 S. Ct. at 892. "The Guidelines are not only *not mandatory* on sentencing courts; they are also not to be *presumed* reasonable." *Id.* at \*2 (emphasis in original). In other words, sentencing courts commit legal error by using a Sentencing Guidelines range as a default to be imposed.

Congress has required federal courts to impose the least amount of imprisonment necessary to accomplish the purposes of sentencing as set forth in § 3553(a) of Title 18, United States Code. Those factors include (a) the nature and circumstances of the offense and the history and characteristics of the defendant; (b) the kinds of sentences available; (c) the advisory guideline range; (d) the need to avoid unwarranted sentencing disparities; (e) the need for restitution; and (f) the need for the sentence to reflect the following: the seriousness of the offense, promotion of respect for the law and just punishment for the offense, provision of adequate deterrence, protection of the public from future crimes and providing the defendant with needed educational or vocational training, medical care, or other correctional treatment. *See* 18 U.S.C. § 3553(a).

**II. A sentence of 60 months is sufficient, but not greater than necessary, to accomplish the goals of sentencing under § 3553(a).**

**i. Nature and Role in the Offense**

Mr. Khweis' offense is simple and straightforward. He traveled to ISIS-held territory, and the jury found that he did so to support ISIS. Mr. Khweis disputes that he went to Syria with any ill intent. Regardless, there is no dispute, that the evidence never showed Mr. Khweis caused anyone harm, or sought to plan any attacks, and Mr. Khweis deeply regrets having traveled to ISIS territory.

Mr. Khweis' "role," as it were, extends beyond his travel, but should also include the role he had in attempting to thwart ISIS objectives. After he established a rapport and trust with FBI Agent Michael Connelly, Mr. Khweis spent weeks offering information on ISIS' inner workings. He provided details of, people, places, and activities from his time among ISIS – details the F.B.I. doesn't often receive first-hand. This information was valuable to the broader international objective of defeating ISIS. *See Suppression Hearing Trans.* at 294-95, 299, 311 ("I would say very important intelligence things on the 10th."). As inane as Mr. Khweis' decision was to travel to that territory, it was also incredibly valuable to have this first-hand information.

**ii. Need to Protect the Public and Deterrence**

*A. Mr. Khweis' escape and cooperation*

The need to protect the public and provide adequate deterrence is complicated in this type of case. On one hand, certainly, the Court must send a message to others contemplating travel to ISIS territory. On the other hand, we, as a society, want

individuals who have made this same type of poor choice and then change their mind, to turn around and provide information to the FBI. When faced with a choice to leave or stay – we want to incentivize leaving ISIS territory rather than staying.

Unfortunately, Mr. Khweis is not, and won't be, the only youth to engage in this travel. Regardless of the sentence Mr. Khweis receives in this case, there will be others who will seek to experience life in the caliphate for themselves. Individuals, especially young men, rarely contemplate the consequences *before* committing an offense, but rather do so once they have completed an act and question it. “[C]riminals, who are often young men, tend to be impulsive and to discount the future. The possibility of a longer prison sentence is too far away to pose as a deterrent.” Allison Shrager, *In America, mass incarceration has caused more crime than it's prevented*, Quartz Magazine, July 22, 2015.<sup>3</sup> citing David S. Lee, Princeton, and Justin McCrary, UC Berkeley, *The Deterrence Effect of Prison: Dynamic Theory and Evidence*, National Bureau of Economic Research, July 2009.

Because Mr. Khweis will not be the only young man to engage in this travel, it is imperative to ask – when those youth change their minds, do we want them to turn themselves in and provide valuable intelligence information, or do we want them stay under ISIS control, possibly causing harm to themselves or others? After all, it is likely

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<sup>3</sup> Available at <https://qz.com/458675/in-america-mass-incarceration-has-caused-more-crime-than-its-prevented/> (citing David S. Lee, Princeton, and Justin McCrary, UC Berkeley, *The Deterrence Effect of Prison: Dynamic Theory and Evidence*, National Bureau of Economic Research, July 2009, available at [http://eml.berkeley.edu/~jmccrary/lee\\_and\\_mccrary2009.pdf](http://eml.berkeley.edu/~jmccrary/lee_and_mccrary2009.pdf); Meier, M. H., Slutske, W. S., Arndt, S., & Cadoret, R. J. (2008). Impulsive and callous traits are more strongly associated with delinquent behavior in higher risk neighborhoods among boys and girls. *Journal of Abnormal Psychology*, 117(2), 377-385 <http://dx.doi.org/10.1037/0021-843X.117.2.377>) (last accessed August 14, 2017).

only then, in those perilous moments on the ground, rather than before they left, that these individuals will be contemplating criminal punishment.

We ask that the Court send a message to those youths, that certainly, you will be punished, but you will not spend the majority of your life in a United States' Penitentiary. If the choice becomes staying under ISIS control or living thirty years in a United States' prison, the chances increase that our young men and women choose the former. The Court should punish the initial behavior, but still incentivize a return home to cooperate.

To be fair, Mr. Khweis did not plead guilty, and for that he doesn't receive acceptance of responsibility points. He did, however, flee ISIS territory. Rather than become a fighter or worse, Mr. Khweis escaped. He turned himself in and risked his life to cooperate with the Government. Ultimately, Mr. Khweis provided the Government with valuable intelligence information to thwart ISIS's objectives. These actions merit consideration, both for Mr. Khweis, and for others who may follow.

*B. Mr. Khweis is not a "radicalized" individual.*

Unlike the large majority of §2339A and B offenders, Mr. Khweis' social media and email presence contains no vocal support for ISIS. There are no twitter messages in which Mr. Khweis expresses agreement with ISIS ideology or methods, and there are no messages encouraging travel or praising an attack. Dr. Jess Ghannam, a forensic behavioral psychiatrist, who has extensive experience evaluating individuals with an admitted commitment to Al-Qaida and ISIS, evaluated Mr. Khweis and determined he is not a religiously motivated extremist, or radicalized Jihadist. *See* Def.'s Exhibit C, *Evaluation Report from Jess Ghannam, PhD, MSc, QME*. In formulating his opinion, Dr. Ghannam met with Mr. Khweis for approximately twelve hours over three visits. He



interview the Khweis family, reviewed discovery, and read trial transcripts. Dr.

Ghannam evaluated these factors using several analytical frameworks and techniques employed in his field. He ultimately opined that

...Mr. Khweis is not a radicalized jihadist nor a religiously motivated extremist. Rather, Mr. Khweis is an impulsive and gullible individual who holds an unrealistic and naive sense of the world. His conduct was driven largely by these factors, combined with years of extensive marijuana and alcohol abuse. Rather than being a radical extremist with a well-defined political and religious ideology, Mr. Khweis' pathway, profile, and history can be understood to be more a function of naiveté, gullibility, and substance abuse.

*Id.*

Importantly, Dr. Ghannam also highlighted the need to keep Mr. Khweis from environments (such a prison) that tend to breed radicalization. He noted that, “[i]t is well known in the forensic and law enforcement community, that the best place for an individual to be radicalized is actually during incarceration. Should Mr. Khweis be diverted to a federal facility with radical extremists, he is much more likely to be radicalized there than if he were sent to a facility where access to treatment for his underlying substance abuse and substance dependence could be addressed.” *Id.*

A significant period of incarceration coupled with a firearms charge, would increase the likelihood that the Bureau of Prisons designates Mr. Khweis to the Communications Management Units in Terre Haute, Indiana. *See* Carrie Johnson, ‘*Guantanamo North*’: *Inside Secretive U.S. Prisons*, NPR, March 3, 2011; Adam Wren, *The Terre Haute Experiment*, Indianapolis Monthly, May

2017 (both referring to FCI Terre Haute as “Guantanamo North”)<sup>4</sup> A lesser sentence would decrease this possibility, and therefore decrease the possibility of Mr. Khweis being placed in this volatile environment.<sup>5</sup> Additionally, rather than imposing a long prison term, the Court can monitor Mr. Khweis’ activities through a period of supervised release.

**iii. Need to Avoid Unwarranted Sentencing Disparities**

In this case, not only did Mr. Khweis flee ISIS territory, turn himself in and cooperate with the Government, his actual offense was less severe when compared with others convicted of similar offenses. Consider the following cases:

NAME	CASE NO.	OFFENSE	PLEA	DATE	SENT.	BASIC FACTS
Ardit Ferizi	1:16CR 42- LMB	18 U.S.C § 2339B 18 U.S.C § 1030(a)(2)( C)	G	9/23/16	20 years	Hacked a server w/ a US victim company site containing databases w/ PII, culled PII of US military members and other govt personnel (1,300 people), provided info to ISIS leader, discussed publishing PII in hit list
Yonathan Melaku	1:12CR 27- GBL	18 U.S.C § 1361 18 U.S.C §924(c)(1)(A) 18 U.S.C §1369	G	1/11/13	25 years	Carried out 5 shootings at military installation in Northern VA. Wanted to send a message that US shouldn't be involved in Iraq and Afghanistan wars. If message not heard, planned futher crimes.

<sup>4</sup> available at <http://www.npr.org/2011/03/03/134168714/guantanamo-north-inside-u-s-secretive-prisons> and <http://www.indianapolismonthly.com/features/the-terre-haute-experiment/> (last accessed Sept. 12, 2017).

<sup>5</sup> Compare Ali Amin and Mohamed Jalloh, versus Ardit Ferizi and John Walker Lindh, described *infra*. Amin and Jalloh received 11-year sentences and are housed at FCI Allenwood, whereas Ferizi and Lindh, who received 20-year sentences are housed at Terre Haute.

Irek Ilgiz Hamidullin	3:14CR 140-HEH	18 U.S.C §2339A, 18 U.S.C §2339A, 18 U.S.C §32, 18 U.S.C §32 18 U.S.C §1117, 2 counts 18 U.S.C §1114, 18 U.S.C §2332(b), 2 counts 18 U.S.C §2332(b), 2 counts 18 U.S.C §2332( c), 18 U.S.C §2332a, 18 U.S.C §924( c), 18 U.S.C §924 (o)	NG	12/3/15	Life plus 30 years	Orchestrated and conducted violent attack on Afghan and US forces in Afghanistan in 2009, and conspired to kill members of the US military. Months of planning and reconnaissance. Had contact w/ high-level Taliban and Haqqani Network personnel. In 2009, led a group of fighters in attack at Camp Leyza, recieved approval from Taliban and Haqqani Network
Ali Shukri Amin	1:15-CR164-CMH	18 U.S.C §2339B	G	8/28/15	11.3 years	Used social media to provide advice and encouragement to ISIL and supporters. Provided instructions on using Bitcoin, and facilitated travel of ISIL supporters to Syria to fight. Helped facilitate travel for Reza Niknejad, who went to fight for ISIL in Syria
Luis Portorreal	1:16CR 210-CMH	18 U.S.C. §1001	G	10/20/16	Probation (5 years)	With Ali Amin, assisted in facilitating Reza Niknejad's travel to Syria to fight for ISIL. Participated in encrypted chats with facilitators, drove Amin and Niknejad to retrieve package with phone and encrypted thumb drive for travel. With Amin, drove Niknejad to airport, and delivered a final letter to Niknejad's family. Deleted encrypted chats, and lied to FBI when question about their involvement.

Heather Coffman	3:15CR-16-JAG	18 U.S.C §1001(a)	G	5/11/15	4.5 years	Used Facebook accounts under diff. names showing support for ISIS. Romantic relationship w/ N.A., communicated almost daily months leading up to Sept 2014. She and N.A. explored options for N.A.'s travel to Syria to fight for ISIS and die a martyr. Formed relationships w/ people she thought were facilitators to help with his travel and training. Admitted she lied in investigation about not knowing if N.A. talked to others who supported ISIS, though she connected him with ISIS fighters to facilitate his travel to fight
Haris Qamar	1:16CR 227-LMB	18 U.S.C §2339B	G	2/17/17	8.5 years	Encouraged lone wolf attacks in DC area. Gave FBI CW ideas for pictures of American landmarks to help ISIS videos. Expressed interest in ISIL violence, loved the bodies, blood, beheadings, and the sound of individuals being killed on video. Described how he would kill someone. Said he believed in suicide bombings. Purchased ticket to go to Turkey, but was prevented from going.
Mohamed Bailor Jalloh	1:16CR 163-LO	18 U.S.C §2339B	G	2/10/17	11 years	Tried to facilitate an attack in VA. Introduced to FBI CS by ISIL member, believed the two would assist in the attack. Thought about attack similar to attack at Ft. Hood, Texas, and praised gunman in attack in Chattanooga. Purchased a weapon to conduct a terrorist attack, and attempted to give money to ISIL.
Joseph Hassan Farrokh	1:16CR 20-AJT	18 U.S.C §2339B	G	7/15/16	8.5 years	Conspired w/ Mahmoud Amin Elhassan to travel to Syria to fight w/ ISIL. Gave Elhassan \$600 to aid in travel. Spoke about supporting violent jihad and ISIL. Used apps to avoid detection by law enforcement. Apprehended at airport trying to get to Syria.

Mahmoud Amin Mohamed Elhassan	1:16CR 64-AJT	18 U.S.C §2339B 18 U.S.C §1001 (False statements)	G	2/24/17	11 years	Conspired w/ Farrokh to provide material support or resources to ISIL. Drove Farrokh to Richmond to enable Farrokh to fly to overseas to join ISIL. Introduced Farrokh to person believed to be able to facilitate Farrokh's travel to the Islamic State. Made false statements to the FBI about Farrokh's travel to hinder their investigation.
Zachary Chesser	1:10CR 395-LO	18U.S.C.§875(c) 18 U.S.C. §373 18 U.S.C. §2339B	G	2/24/11	25 years	Helped create a website and posted messages to help those who wished to engage in violent jihad. Posted requests for others to attack specific individuals connected to a TV episode and related Facebook group considered defamatory to the Prophet Muhammad. Published photos, names, addresses, and other personally identifying information of those individuals, including a teenager, and a photo of a young man from Texas with his brother and parents that included a possible address of his possible church or school. Attempted to board a flight to Uganda, using his child to conceal his ultimate goal of travelling to Somalia to join al-Shabaab. Had previously attempted to join al-Shabaab.
Jesse Curtis Morton	1:12CR 035-LO	18 U.S.C §371 18 U.S.C §875(c) and 2 18 U.S.C §2261A(2)(B) and 2	G	6/22/12	11.5 years	Co-conspired with Chesser. Created "Revolution Muslim," an organization that used websites to solicit murder, threaten others, and encourage violent jihad. Encourage Muslims to support Usama bin Laden, Anwar Al-Awlaki, al-Qaida, the Taliban, and other Muslims engaged in or espousing jihad. Stated that the 9/11 attacks were against legitimate military targets, and justified Nidal Hasan's killing of 13 soldiers at Fort Hood as a "preventative strike" because these soldiers were deploying to Iraq. Moved to Morocco and stated, stated "I want martyrdom ... and will continue to pursue it inshAllah... as

						long as it is in the limits of the shariah." Sent messages to an associate encouraging martyrdom, and the associate was later arrested and charged in connection with a plot to attack the Pentagon and the U.S. Capitol building with remote controlled aircraft filled with explosives.
Mahmoud Amin Mohamed Elhassan	1:16CR 64-AJT	18 U.S.C §2339B 18 U.S.C §1001 (False statements)	G	2/24/17	11 years	Conspired w/ Farrokh to provide material support or resources to ISIL. Drove Farrokh to Richmond to enable Farrokh to fly to overseas to join ISIL. Introduced Farrokh to person believed to be able to facilitate Farrokh's travel to the Islamic State. Made false statements to the FBI about Farrokh's travel to hinder their investigation.
Muna Osman Jama	1:14CR 230-AJT	Count 1, 18 U.S.C §2339B, Counts 2-21, 18 U.S.C §2339B & 2	NG	3/31/17	12 years	Sent money to financiers of al-Shabaab in Somalia and Kenya. Organized "Group of Fifteen" to track monthly payments that helped finance al-Shabaab military operations in northern Somalia, and was used to fund 2 safehouses. 1 safehouse stored weapons and was used for attack prep, other to treat wounded fighters. Had close relationship w/ leaders and were privy to inside info. Recorded laughing at carnage at Westgate Mall in Nairobi, and Boston Marathon bombing.
Hinda Osman Dhirane	1:14CR 230-AJT	Count 1, 18 U.S.C §2339B, Counts 16-21, 18 U.S.C §2339B & 2	NG	3/31/17	11 years	Sent money to financiers of al-Shabaab in Somalia and Kenya. Organized "Group of Fifteen" to track monthly payments that helped finance al-Shabaab military operations in northern Somalia, and was used to fund 2 safehouses. 1 safehouse stored weapons and was used for attack prep, other to treat wounded fighters. Had close relationship w/ leaders and were privy to inside info. Recorded laughing at carnage at Westgate Mall in Nairobi, and Boston Marathon bombing.

John Phillip Walker Lindh	1:02CR 37-TSE	31 C.F.R §§545.204 & 545.206(a) & 50 U.S.C. §1705(b) & 18 U.S.C § 2, 18 U.S.C §§ 924( c)(1)(A) & 924( c)(1)(B)(ii) & 2)	G	10/4/02	20 years	Traveled to Afghanistan to fight for Afghan Taliban govt forces against Northern Alliance fighters. Captured by Afghan Northern Alliance in Kunduz. "Escaped" bc makeshift prison scene of Taliban uprising (many killed including CIA officer). Lindh allegedly knew of uprising and said nothing and did not cooperate w/ Americans. Recaptured and flown back to US in 2002.
Masoud Khan	Crim. No: 03-296-A	18 U.S.C §371, 18 U.S.C §2384, 50 U.S.C §1705, 18 U.S.C §2339A, 18 U.S.C §924(o), 3 counts, 18 U.S.C §924( c)	NG	6/4/04	Life (reduced by 20 years in 2005)	Part of Virginia jihad network that planned attack in US and abroad. Trained in US and in training camps in Pakistan. Some men bought weapons.
Seifullah Chapman	Crim. No: 03-296-A	18 U.S.C §371, 18 U.S.C §2339A, 18 U.S.C §924(o) 2 counts, 18 U.S.C §924( c)	NG	6/11/04	85 years (reduced in 2005 to 65 years)	Part of Virginia jihad network that planned attack in US and abroad. Trained in US and in training camps in Pakistan. Some men bought weapons.
Hammad Abdur-Raheem	Crim. No: 03-296-A	18 U.S.C §371, 18 U.S.C §2339A, 18 U.S.C §924(o)	NG	6/4/04	8 years (reduced in 2005 to 4.3 years)	Part of Virginia jihad network that planned attack in US and abroad. Trained in US and in training camps in Pakistan. Some men bought weapons.
Khwaja Mahmood Hasan	Crim. No: 03-296-A	18 U.S.C §371, 18 U.S.C §924( c)	G	11/7/03	11.25 years	Part of Virginia jihad network that planned attack in US and abroad. Trained in US and in training camps in Pakistan. Some men bought weapons.
Yong Ki Kwon	Crim. No: 03-296-A	18 U.S.C §371, 18 U.S.C §924( c), 18 U.S.C §924(h)	G	11/7/03	11.5 years	Part of Virginia jihad network that planned attack in US and abroad. Trained in US and in training camps in Pakistan. Some men bought weapons.
Mohanned Aatique	Crim. No: 03-296-A	18 U.S.C §960 & 2, 18 U.S.C §924( c)	G		10.5 years	Part of Virginia jihad network that planned attack in US and abroad. Trained in US and in training camps in Pakistan. Some men bought weapons.

Donald Thomas Surratt	Crim. No: 03-296-A	18 U.S.C §371, 18 U.S.C §924(h)	G	11/7/03	3.8 years	Part of Virginia jihad network that planned attack in US and abroad. Trained in US and in training camps in Pakistan. Some men bought weapons.
Randall Todd Royer	Crim. No: 03-296-A	18 U.S.C §924(c) & 2, 18 U.S.C §844(h)(2) & 2	G	4/9/04	20 years	Part of Virginia jihad network that planned attack in US and abroad. Trained in US and in training camps in Pakistan. Some men bought weapons.
Ibrahim Ahmed Al-Hamdi	Crim. No: 03-296-A	18 U.S.C §924(c) & 2, 18 U.S.C §944(h)(2) (carrying an explosive during the commission of a felony)	G	4/9/04	15 years	Part of Virginia jihad network that planned attack in US and abroad. Trained in US and in training camps in Pakistan. Some men bought weapons.
Ahmed Omar Abu Ali	1:05CR 53-GBL	18 U.S.C §2339B, 18 U.S.C §2339B, 18 U.S.C §2339A 18 U.S.C §2339A, 50 U.S.C §1705(b); 31 C.F.R §595.204, 50 U.S.C §1705(b); 31 C.F.R §595.204, 18 U.S.C §1751, 49 U.S.C §(a)(2), 18 U.S.C §32(b)(4)	NG	3/29/06	Life	Arrested by Saudi authorities. There to join al-Qaeda cell. Received training from cell members in weapons, explosives, document forgery. Plot to assassinate President. Engaged in conspiracy to hijack and destroy civilian airliners. Researched nuclear power facilities in US at behest of senior al-Qaeda operative.
Sabri Benkahla	1:06cr9 -JCC	18 U.S.C §1623, 18 U.S.C §1503	NG	7/24/07	10 years	Virginia jihad network member. Traveled to Pakistan via Great Britain to a jihad training camp.



Iyman Faris	Crim. No. 03-4965	18 U.S.C.A §2339A, 18 U.S.C.A §371	G (but attempt to w/d plea)	10/28/03	20 years	Before and after September 11, 2001, made trips to Pakistan and Afghanistan, met with Osama Bin Laden and other al Qaeda members who were considering terrorist plots in the United States. Conducted research on ultralight airplanes for members of al Qaeda, provided the results of his research. At the request of members of al Qaeda, investigated the possibility of destroying the Brooklyn Bridge by severing the cables with gas wire cutters. As part of planning a possible attack in the United States, explored the conceivability of obtaining gas cutters and cased the Brooklyn Bridge to determine if such a method of destruction were viable.
Amine Mohamed El-Khalifi	1:12-CR-37 - JCC	18 U.S.C §2332a(a) (attempting to use a weapon of mass destruction)	G	9/14/12	30 years	Plotted to commit a suicide bombing in the U.S. Capitol. Surveyed locations, purchased materials for the attack. Armed himself with what he believed to be a functioning bomb and a MAC-10 automatic weapon. The defendant was arrested as he set off towards the Capitol to carry out his plot. Armed himself with an automatic weapon and a bomb. Arrested as he set off to toward the Capitol to carry out his plot.
Zacarias Moussaoui	01cr455	18 U.S.C §§ 2332b(a)(2) & (c), 18 U.S.C §§32(a)(7) & 34, 18 U.S.C § 2332a(a)	G (but attempt to w/d plea)	5/4/06	Life	Admitted involvement with al-Qaeda, but claimed not involved in 9/11 attacks. Said he was preparing for another attack. Later claimed he had been intended for 9/11 attack.

Of these cases, Mr. Khweis' conduct was not more serious than Sabri Benkahla who traveled to Pakistan via Great Britain to a jihad training camp. Benkahla received 121 months. Mr. Khweis was not more serious than Jama or Dhirane who sent money to financiers of al-Shabaab that was used to fund two safe houses, one of which was used for weapons storage and attack preparation. Jama and Dhirane received sentences of 12

and 11 years respectively. Mr. Khweis' conduct was not more serious than Jalloh who tried to plan an attack in Virginia. Jalloh received a sentence of 11 years. Mr. Khweis' offense was not more serious than Qamar, who encouraged, and provided information for lone wolf attacks in the Washington, D.C., and who purchased ticket to go to Turkey, but was prevented from going. Qamar received 102 months. Mr. Khweis' offense was not more serious than Ferizi who hacked a computer database to assist an ISIL leader in creating a hit list of 1,300 service members, permanently endangering their lives. Ferizi received a sentence of 20 years.

Mr. Khweis' offense was certainly not more serious than Daniela Greene's offense out of United States District Court in Washington, D.C. *See* 1:14-cr-00230-RC, ECF No. 56 (D.D.C May 7, 2015). Greene was an interpreter for the FBI and held a top-secret security clearance. She was responsible for investigating a leader of ISIS in Syria. During her participation in the investigation, she lied and told the FBI she sought to travel to Germany to see her family. Instead, she traveled to Turkey, crossed the Syrian border, met with the ISIS leader she was investigating, and married him. They spent over a month together during which time, Greene informed the ISIS leader she was employed by the FBI, and the FBI had an open investigation into his activities. Ms. Greene had a change of heart, and after sending several inculpatory emails, returned to the United States forty days later. *See id.* Although providing information to an ISIS leader regarding the FBI's investigation of him would clearly be "material support," Greene was charged, and pled guilty to, making false statements. She received a sentence of twenty-four months imprisonment. *See id.* at ECF No. 66-2.

In this case, just like Greene, Mr. Khweis traveled to ISIS territory. He stayed slightly longer than Greene at approximately 2.5 months. However, unlike Greene, Mr. Khweis did not work for the FBI, have a top-secret security clearance, and tip off an ISIS leader to an FBI investigation. Of all the cases mentioned, Mr. Khweis' offense is most similar to Greene's, though hers is more severe. Mr. Khweis elected to exercise his constitutional right to a trial, and Ms. Greene pled guilty, and that fact should be taken into consideration. However, simply exercising a constitutional right should not result in a sentence decades longer than Ms. Greene's 24 months.

The Government's request equates Mr. Khweis' offense with, not with the more appropriate cases like Greene's, but instead with people like Melaku, who carried out five shootings at military bases in Northern Virginia; or Ardit Ferizi who gained personal information of 1300 service members to assist a ISIL for a hit list; or El-Khalifi who plotted a suicide bombing at the United States Capitol, who armed himself with an automatic weapon and a bomb, and was arrested as he set off to toward the Capitol to carry out his plot. These offenses are all far more serious than Mr. Khweis' conduct. Mr. Khweis has also attached a list of other cases around the country for sentencing disparity consideration. *See* Def. Ex. D.

**iv. Mr. Khweis' Personal Characteristics**

Mr. Khweis made a poor decision to travel to ISIS territory, however, that act is only one moment of his 28 years. Others have highlighted his caring, helpful and respectful nature. *See* Def.'s Ex. E. Mr. Khweis' mother wrote, "I believe that he is aware of the pain that he has caused for everyone in the community, family and friends. Still to this day everyone is still shocked of what happened. Mohamed always helped

around in the neighborhood whether it was shoveling snow, cutting the grass, or even raking leaves. My son Mohamed always liked to give a helping hand when he sees someone needs help.” *Id.* His brother explained to the Court, “Mohamed was a kindhearted person. Just like my mother, the normal thing for him was to put other people in his life first....That is who I remember my brother Mohamed to be, and let me tell you who he is today. Mohamed is a tremendously bright person and I still believe his potential is still there but buried inside that jail cell.” *Id.*

Mr. Khweis’ family friend wrote of the particular kindness he showed her, “They say blessings come in disguise and that is what Mohamed was and is to my family and me. I am a single mother and there was a point where I could not even buy clothes or diapers for my children or find anyone to watch them when I would want to look for work. Mohamed was the only one who would offer to watch them for me free of charge and my children absolutely loved being around him. I have known Mohamed for 9 years. Until this day they still ask me about him and when they can see him again. I will always see Mohamed as that wonderful and helpful person he is.” *Id.* Other letters describe Mr. Khweis’ kindness, generosity, and remorse, showing that Mr. Khweis is not the individual the Government paints him to be through this single act.

Importantly, Mr. Khweis has not sat idle while incarcerated. He has participated extensively in classes, attempting to further his education and engagement. He has participated in Bible Classes, Alpha Group Study, Discipleship Classes, Church Morning/Evening Services, Catholic Mass, Narcotics Anonymous, Health Education, Motivational Program, Path for Peace, Mindfulness Program, Life Learning Program, NOVA Open Road college courses, Re-Entry Life Skills Coaching, Motivational

Program, Resource & Community Services Workshop, and Art Class/Contest. *See* Def.’s Ex. F. Even just recently, Mr. Khweis completed a community college course and received the highest marks. This is evidence of Mr. Khweis’ commitment to being in engaged and productive in his community. He seeks an opportunity to show he still has much to offer in this regard. He has remained in general population almost the entire time he has been incarcerated and has not had one incident or infraction. *See id.*

Finally, Mr. Khweis has had an opportunity to reflect on his actions and circumstances. He wrote to the Court that he is disappointed in himself, and says to himself every day that “I wish I never traveled to a place I never should have gone. I ruined my life and my family’s life. I disappointed my family and feel terribly sorry for doing so.” *See* Def.’s Ex. A. Mr. Khweis reflected on his upbringing, and stated, “instead of making my family proud of me I brought my family shame and humiliation.” *Id.* He explained, “everyday I live in regret wishing I could turn back time and made [sic] better decision.” *Id.* We ask that the Court grant Mr. Khweis an opportunity to make those better decisions.

**v. Mr. Khweis’ criminal history is overstated.**

A criminal history category six grossly overstates Mr. Khweis’ one misdemeanor conviction for a traffic offense, which, under normal circumstances, would place him in Category I. “If reliable information indicates that a defendant’s criminal history category substantially over-represents the seriousness of the defendant’s criminal history or the likelihood that the defendant will commit other crimes,” the Court may depart downward. *See* U.S.S.G. § 4A1.3(b); *United States v. Moreland*, 437 F.3d, 424, 432 (4th Cir. 2006); *see also United States v. Nelson*, 166 F. Supp. 2d 1091 (E.D. Va. 2001).

This departure is available in the context of the terrorism enhancement in addition to others crimes. *See United States v. Meskini*, 319 F.3d 88, 92 (2d Cir. 2003), (“A judge determining that § 3A1.4(b) over-represents the seriousness of defendant’s past criminal conduct or the likelihood that defendant will commit other crimes always has the discretion under § 4A1.3 to depart downward at sentencing.”). Thus, regardless of the type of crime, departures are “encouraged” when a defendant’s criminal history category fails to accurately reflect his true criminal history or the likelihood he will commit other crimes. *See United States v. Dixon*, 318 F.3d 585, 588 (4th Cir. 2003).

This point was illustrated in this Court in *United States v. Benkahla*, 501 F.Supp.2d 748 (E.D. Va. 2007). Benkahla was convicted by a jury of two counts of making false declarations to a grand jury, obstruction of justice, and making false statements to an FBI agent, after repeatedly denying that he traveled to Pakistan to engage in weapons training to prepare for violent jihad. *Id.* at 750-51. Benkahla received the terrorism enhancement with a total guidelines range of 210-262 months. *Id.* at 757.

The Court sentenced Benkahla below Guidelines, explaining that, “For an individual with no criminal record and no evidence of ever having committed an illegal act in his life outside the conduct for which he is convicted, this clearly over-represents the seriousness of his criminal history.” 501 F.Supp.2d at 759. The Court also noted that criminal history category VI over-represented the likelihood Benkahla would commit other crimes, remarking that he did not exhibit common characteristics of being a terrorist, and therefore, lacked “the same likelihood of recidivism, the difficulty of recedivism, or the need for incapacitation.” *Id.*

In this case, the seriousness of the crime is already accounted for in the increased offense level mandated by the terrorism enhancement. The criminal history category, on the other hand, is meant to reflect the history and characteristics of the defendant, particularly with respect to recidivism. Not only is Mr. Khweis' actual criminal history minimal, his risk of recidivism is also incredibly low because he is not a radicalized individual, and has continued self-improvement activities while incarcerated, including reflecting on the seriousness of his actions. *See* Def.'s Exhibit C, *Evaluation Report from Jess Ghannam, PhD, MSc, QME*. He did not plead guilty, but has nevertheless expressed remorse and regret regarding his decision to travel. Mr. Khweis' history as a generally law-abiding citizen should be accounted for in his sentence, but instead, Mr. Khweis' Guidelines calculation (and particularly his criminal history score) is the same as an individual who led a life of terrorism and terrorist-related activity prior to his offense. For example, Ardit Ferizi engaged in years of criminal activity prior to assisting in preparing a hit list with personal information of service members for ISIL. *See* 1:16CR42, ECF No. 72-1 at 15-16. Yet, the two individuals have identical criminal history scores. In order to provide meaningful distinction between these two types of individuals, the Court should vary downward and sentence Mr. Khweis below the Guidelines range.

### **CONCLUSION**

WHEREFORE, for the above reasons, Mr. Khweis respectfully requests a sentence of 60 months. Mr. Khweis further asks for credit for the time he served in Kurdish prison, *See United States v. Ali Saleh Kahlah al-Marri*, 1:09-cr-10030-MMM-JAG, ECF No. 54 (C.D. Ill, Nov. 2, 2009) (applying credit for time defendant was held as

an enemy combatant because the detention “involved the same conduct with which he was charged in this indictment.”), and that the Court recommend the RDAP program and placement at FCI Cumberland.

Respectfully submitted,  
MOHAMAD KHWEIS  
By Counsel

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**CERTIFICATE OF SERVICE**

I, hereby certify, that on the 20th day of October, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following and all parties to this action:

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\_\_\_\_\_  
/s/  
Jessica N. Carmichael, Esq.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Criminal No. 1:16CR143</b>
	)	
<b>MOHAMAD JAMAL KHWEIS,</b>	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT’S POSITION ON SENTENCING – EXHIBIT A**

**Letter from Mohamad Khweis**

Dear Judge O'Grady,

On June 7 2017, I was convicted on terrorism related charges and a gun charge. The worst thing that happened to me and my family. I never thought in a million years I would ever get charged with terrorism related charges and a gun charge. I am still in shock til this very day and disappointed in myself for this life changing event. I pace back and forth in my cell in my cell in regret. I tell myself everyday throughout the day that I wish I never traveled to a place I never should have gone. I ruined my life and my family's life. I disappointed my family and I feel terribly sorry for doing so.

My family came here to the best country in the world to raise a family and to make sure their children have a great life and live that American dream. Ever since I was a baby my parents worked hard to make sure we have everything we need. When I was a child my parents worked long hours they had to get a baby-sitter whose a great family friend, an Arab Christian from Lebanon to take me to my bus stop in the morning and pick me up after school and take care of me until my mom and dad came home.

My parents always told my brother and I they work long hours to make sure we have the best lives and a good future. They tell us how its important to get a good education so we can have a good career and a great future. My parents told me to be like my close relatives who were doctors, lawyers, and police officers. Instead of making my family proud of me I brought my family shame and humiliation.

Ever since I was young I wanted to make my family happy and proud of me. I started working at an early age. I remember having to go to my school to get a worker's permit in order to work because I was under the age of 16. I gave my parents my very first paycheck. My parents always taught me to respect my elders so in highschool I worked at a senior citizen's home. I also often volunteered for community work and community events which made my family very proud.

When I arrived in Syria reality hit me. I couldn't believe what I had done and where I was at. I hated myself for making the worst decision I ever made in my life. During my escape my vision constantly became blurry due to tears building up. I wanted to scream due to regret but was afraid of being heard.

After my escape I was so happy to see the FBI agents and I am really sorry I was not completely truthful at first.

During my time in Alexandria Detention Center surrounded by institutionalized career criminals, everyday I live in regret wishing I could turn back time and made better decisions. During my stay at the Alexandria jail. I had plenty of time to think about my actions and what I put myself and my family through.

I had voluntarily signed up and taken many beneficial programs at the Alexandria Detention Center to improve and better myself as an individual which includes making better decisions. During my time here I even took a couple college courses which made my parents happy. I also took various religious services such as church and catholic mass and had the pleasure to talk to several pastors and priests and asked for their blessings.

I wish I can put all this behind me and do something I love and make my family proud of me again. I deeply regret the decisions I made and assure you that I definitely learned my lesson and I ask for your

mercy on the day of sentencing

Sincerely,

M. Khan

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Criminal No. 1:16CR143</b>
	)	
<b>MOHAMAD JAMAL KHWEIS,</b>	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT’S POSITION ON SENTENCING – EXHIBIT B**

*Curriculum Vitae*  
**Jess Ghannam, PhD, MSc, QME**  
**Forensic Behavioral Medicine**

Ghannam, Jess  
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## **CURRICULUM VITAE**

### **JESS GHANNAM**

#### **University Address**

Department of Psychiatry  
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#### **Office Address/Mailing Address**

1939 Divisadero, Suite 3  
San Francisco, California 94115  
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Place of Birth: Detroit, Michigan

#### **Education**

*Post-Doctoral Scholar*  
Department of Psychology  
Stanford University  
Stanford, California 1984-1985

*Post-Doctoral Fellow*  
Department of Psychiatry  
Mount Zion Hospital and Medical Center  
San Francisco, California 1984

*PhD – Clinical Psychology*  
Department of Psychology  
University of California, Berkeley  
Berkeley, California 1984



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*MSc – Medical Science*  
Department of Health and Medical Sciences  
University of California, Berkeley  
Berkeley, California 1983

*MA – Clinical Psychology*  
Department Of Psychology  
University of California, Berkeley  
Berkeley, California 1981

*AB – Psychology, Philosophy*  
LS&A College of Honors  
University of Michigan  
Ann Arbor, MI 1979

### **Licenses/Certifications**

Licensed Clinical Psychologist, California, PSY9261, 1986  
Qualified Medical Evaluator, California, 2007  
Certified for National Security Cases requiring TS/SCI Clearance, 2012

### **Professional Positions/Employment**

Clinical Professor of Psychiatry, Department of Psychiatry, University of California, San Francisco, 1989-Current

Chief, Medical Psychology, UCSF-Mount Zion Medical Center, University of California, San Francisco, 1993-2014

Faculty, Global Health Sciences, University of California San Francisco, 2004-Current

Director, Behavioral and Health Psychology, Northern California Functional Restoration Program, Emeryville, CA 2005- 2014

Chief, Behavioral Medicine and Health Psychology, Pain and Rehabilitative Consultants Medical Group, Berkeley, CA 2002-Current

Adjunct Professor of Ethnic Studies, San Francisco State University, San Francisco, California, 2002-2012

Faculty, UCSF Comprehensive Cancer Center, 1997-Current

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Director, Geriatric Mental Health Program and Clinic, UCSF Center on Aging, University of California, San Francisco, 1992-2002

Director of Training, Department of Psychiatry, UCSF Stanford Health Care, UCSF Mount Zion, San Francisco, 1989-2000

Assistant Clinical Professor of Psychiatry, Department of Psychiatry, University of California, San Francisco, 1985-2002

Visiting Professor, Department of Psychology, University of California, Berkeley, Berkeley, California, 1989,1990

Guest Editor, American Psychiatric Press, 1995-Current

Member, Board of Directors, Lacanian School for Psychoanalysis, Berkeley, California, 1996-2007

Member, Academic Board, Gaza Community Mental Health Programme, 1997-Current

Staff Psychologist, Department of Psychiatry, Outpatient Services, California Pacific Medical Center, 1991-1999

Assistant Director of Training, Crisis Clinic, Department of Psychiatry, Mount Zion Hospital and Medical Center, 1986-1991

Crisis Clinic Supervisor, Crisis Clinic, Department of Psychiatry, Mount Zion Hospital and Medical Center, 1984-1991

Assistant Research Psychologist and Residential Scientist, Department of Psychiatry, University of California, San Francisco, 1985-1989

Adjunct Professor of Psychology, San Francisco State University, San Francisco, 1983-1990

Staff Psychologist, Children's Comprehensive Crisis Service, Children's Hospital and Medical Center, San Francisco, 1983-1984

### **Special Honors and Awards**

Mayor's Award for Outstanding Community Service, San Francisco, 2016

Novus Award for Distinction in Global Health, San Francisco, 2015.

Ghannam, Jess  
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Champion of Diversity Award, for outstanding contribution to diversity at UCSF, 2004.

Certificate of Appreciation, UCSF-Mount Zion Hospital and Medical Center, for outstanding community service contribution, 1990

Certificate of Appreciation, San Francisco Police Department, for outstanding contribution to community work with the Psychiatric Liaison Unit, 1989

University of California, San Francisco, School of Medicine, Nomination for Outstanding Teacher by 1st year medical students, 1989

University of California, San Francisco, School of Medicine, Nomination for Outstanding Teacher by 1st year medical students, 1988

Sigma XI Scientific Society, 1984

Honor Roll, University of California, Berkeley, 1979-1984

National Institute of Mental Health Fellowship, Bethesda, Maryland, 1979-1982

Angell Scholar, University of Michigan, 1980

Phi Beta Kappa, University of Michigan, 1979

Pillsbury Award for Outstanding Honors Thesis, University of Michigan, 1979

Special Instructional Aide Fellowship, Department of Psychology, University of Michigan, 1978

Institute for Human Adjustment Quarter-time Fellowship, University of Michigan, 1978

College Honors, University of Michigan, 1975-1979

### **Hospital and Medical Group Affiliations**

Member, UCSF Medical Staff, San Francisco, 1992-Current

Member, Summit Medical Center, Medical Staff, 2005-Current

Member, Alta Bates Medical Center, Medical Staff, 2001-Current

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Member, UCSF-Stanford Health Care Medical Group, San Francisco 1998-2000

Member, Brown and Toland Medical Group, San Francisco, 1996-Current

Attending Medical Staff, Department of Psychiatry, Mount Zion Hospital and Medical Center, 1986-2000

Attending Medical Staff, Department of Psychiatry, San Francisco Veterans Administration Hospital, 1988-1990

San Francisco Medical Group, Affiliate, San Francisco, 1990-1999

### **Internships**

Pre- and Post-Doctoral Fellowship, Department of Psychiatry, Mount Zion Hospital and Medical Center, San Francisco, 1982-1984

Psychology Intern, Psychology Clinic, University of California, Berkeley, 1981-1982 (APA Approved)

Psychology Intern, Psychology Clinic, University of California, Berkeley, 1980-1981 (APA Approved)

Neuro-psychology Intern, Departments of Rehabilitation and Neurology, University of Michigan, 1978- 1979

### **Clinical and Consultation Experience**

Consultant and Expert Witness, Department of Defense, OMC. For National Security Cases involving PTSD and Torture, 2006-Current

Consultant for the Center for Constitutional Rights, Guantanamo Detainee Project for Rehabilitation and Resettlement, 2005-Current

Consultant for REPRIEVE, Guantanamo Detainee Project for Rehabilitation and Resettlement, 2005-Current

Consultant for Survivors International on Cultural Competence in working with Torture Survivors from the Middle East, Arab and Muslim World, 1996-current

Consultant for the IRCT and RCT on Cultural Competence in working with Torture Survivors from the Middle East, Arab and Muslim World, 2000-current

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Psychiatric Consultant, Alta Bates Medical Center, 4E Oncology Service, 2000-2012

Psychiatric Consultant, Summit Medical Center, Oncology Service, 2004-2012

Consultant, San Francisco Art Institute, Center for Individual Learning, 2000-2002

Psychiatric Consultant, UCSF, Department of Surgery, 1997-Current

Psychiatric Consultant, UCSF, Cancer Center, 1996-Current

Psychiatric Consultant, Senior Health Program, UCSF Institute on Aging, San Francisco, 1996-2002

Psychiatric Consultant, Bayview-Hunter's Point Adult Day Health Program, San Francisco, 1994-1995

Psychiatric Consultant, Alzheimer's Day Center, Institute on Aging, San Francisco, 1992-2002

Psychiatric Consultant, CORF Program, Institute on Aging, San Francisco, 1992-2002

Consultant, Research Center, UCSF Institute on Aging, San Francisco, 1988-2002

Neuropsychological and psychiatric consultation-liaison, Lakeside Senior Health Program. University of California, San Francisco, San Francisco, 1990-2000

Neuropsychological and psychiatric consultation-liaison with Pediatric Rehabilitation Program, Department of Pediatrics, University of California, San Francisco, San Francisco, 1990-2001

Psychiatric Consultant, Adult Day Health Center, UCSF Institute on Aging, San Francisco, 1989-2002

Neuropsychological and psychiatric consultation-liaison with Rehabilitation Unit, Mount Zion Hospital and Medical Center, University of California, San Francisco, 1988-2001

Neuropsychological and psychiatric consultation-liaison with AIDS Unit, Mount Zion Hospital and Medical Center, University of California, San Francisco, 1988-1996

Ghannam, Jess  
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Horowitz, L. M., Locke, K. D., Morse, M. B., Waikar, S. V., Dryer, D. C., Tarnow, E., & Ghannam, J. (1991). Self-derogations and the interpersonal theory. *Journal of Personality and Social Psychology*, 61(1), 68.

Horowitz, M., Merluzzi, T., Ewert, M., Ghannam, J., Hartley, D., and Stinson, C. (1991), Role-Relationship Model Configurations In M.. Horowitz (Ed.) *Person Schemas and Maladaptive Interpersonal Patterns*. Chicago: University of Chicago Press.

Horowitz, M., Markman, H., & Ghannam, J.(1990). A classification theory of defense. In Jerome L. Singer (Ed.) *Regression and Dissociation: Implications for Personality Theory. Psychopathology and Health*, Chicago: University of Chicago Press.

Horowitz, M. J., Merluzzi, T. V., Ewert, M., Ghannam, J. H., Hartley, D., & Stinson, C. H. (1988). Rote-Relationship Modets Configuration. *Psychodynamics and Cognition*, 115.

Ghannam, J.H. and Gresham, G. (1989) The anatomy of duty-to-warn: Clinical and legal implications. *The California Psychologist*, vol.23, #3, p9, p.14.

Ghannam, J.H. and Gresham, G. (1989) Supreme Court to review consent with involuntary psychiatric patients. *The California Psychologist* vol .23 #2, p. 5

Gresham, G. and Ghannam, J.H. (1988) A preliminary exploration of informed consent in involuntarily detained patients. *The California Psychologist* vol. 22,#4, p 18.

Ghannam, J.H. (1988) Structural change: A text analytic approach. *Proceedings of the International Society for Psychotherapy Research*. Santa Fe, New Mexico.

Ghannam, J.H. (1987) The Traumatized Self. A Look at Trauma and Its Vicissitudes. *Contemporary Psychiatry*. 6(3), 184- 185.

Ghannam, J.H. and Horowitz, M. (1987) The Social and Psychological Structure of Disaster. *Contemporary Psychiatry*. 6(2), 133-134.

Ghannam, J.H. (1987). A Method for Characterizing Representations of Self and Other from Clinical Transcripts. *Proceedings of the Psychotherapy Research*



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Meeting. Ulm, West Germany.

Gevins, A.S., Doyle, J.D., Cutillo, B., & Ghannam, J.H. (1981). Electrical Potentials in Human Brain During Cognition: New Methods Reveal Dynamic Patterns of Correlation. *Science*, 213., 918-922.

Papsdorf, J.D., & Ghannam, J.H. (1978). Anxiety and Hemispheric Specialization: Implications for EEG Biofeedback. In L. Kimmel (Ed.) *Biofeedback and Self-Regulation*, LEA: New York.

### **Published Abstracts**

Ghannam, J.H. (1984c). Language and the Psychotherapeutic Process: An Empirical Exploration. DOCTORAL DISSERTATION; University of California, Berkeley.

Ghannam, J.H. (1983). A Critical Analysis of Neurobiological Plasticity. Criteria for a New Model. MASTERS' THESIS, University of California, Department of Health and Medical Sciences.

Ghannam, J.H. (1981). Human Hippocampal Correlates of Memory Function and Dysfunction. MASTERS' THESIS, University of California, Department of Psychology

### **Papers Presented**

Ghannam, J. & Robinson, M. Torture By Other Means: CIA Victims and the Denial of Rehabilitation to Survivors at Guantanamo Bay. International Rehabilitation Council for Torture Victims, Annual Convention, Mexico City. December, 2016.

Bylund CL, Ghannam J, Afana A, Ho E, Al-Arab B, Al-Khal A. Implementation and evaluation of a stress management and wellness course for residents in Qatar. Accreditation Council for Graduate Medical Education Annual Conference, National Harbor, Maryland: February 2016.

Ghannam, J. Empowering Communities and Individuals: Building Mental Health Capacity in the MENA Region. 7<sup>th</sup> International Conference: Health Issues in Arab Communities. Muskat, Oman. March 2015.

Ghannam, J. Planning Future Community Mental Health Programs in Gaza: The Therapeutic Playground. 7<sup>th</sup> International Conference: Health Issues in Arab Communities. Muskat, Oman. March 2015.

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Ghannam, J. (2013, November). Mental health in a state of war: An intervention and service model for the children of Gaza. In 141st APHA Annual Meeting and Exposition (November 2-November 6, 2013). APHA.

Ghannam, J. The Psychiatric and Psychological Effects of Detention at Guantanamo: A Review. University of California, Berkeley, School of Public Health, March 2010.

Ghannam, J. Health, Human Rights, and Social Responsibility: The Humanitarian Crisis in Gaza. California State University Fresno. March 2010.

Ghannam, J. The Health Consequences of War and Occupation. UCSF Medical School and Medical Center, 2003,2004,2005,2006, 2007, 2008, 2009, 2010

Ghannam, J. The Effects of Racialization, Profiling, and Special Registration on Muslim-American Identity. University of California, Berkeley Conference on Islam in America, 2003

Ghannam, J. The Mental Health Consequences of War and Occupation. University of California, Berkeley, School of Public Health, 2003,2004,2005,2006

Ghannam, J. Mental Health and Human Rights, Physicians for Human Rights, Stanford Medical School, Stanford, California. 2002,2003.

Ghannam, J.H. and Abdel Hamid Afana, A. Mental Health Training in Palestine: Current Perspectives and Future Considerations. (1997). International Conference on Mental Health and Human Rights. Gaza Community Mental Health Programme, Gaza.

Ghannam, J.H. Oppression and Torture: Psychoanalysis Under Occupation. (1996). Association for Psychoanalysis, Society and Culture. Washington, D.C.

Ghannam, J.H., & Mergenthaler, E. (1989). Heart Rate Correlates of Conflictual Topics in Psychotherapy Text, European Society for Psychotherapy Research, Berne, Switzerland

Ghannam, J.H. (1989) Physiological Correlates of Different Themes in Psychotherapy, Society for Psychotherapy Research, Annual Convention, Toronto, Canada

Ghannam, J.H. & Gresham, G.L. (1989). Informed consent to receive antipsychotic medication in involuntarily detained patients. American Society of Law and Medicine Annual Convention, London.

Ghannam, J.H. (1988). Structural Change: A Text Analytic Approach. Society for

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Psychotherapy Research. Santa Fe, New Mexico.

Ghannam, J.H. & Metzler, T. (1988). Threshold Determination in Pathological Grief, Social Phobia & Controls. Experimental Studies Group. MacArthur Foundation Project on Conscious and Unconscious Mental Processes. University of California, San Francisco.

Ghannam, J.H. & Marmar, C.R. (1987). Experimental Probe Studies of Unconscious Mental Processes. Swedish Research Society, Umea, Sweden.

Ghannam, J.H. (1987). Representations of Self and Other From Clinical Transcripts: A Quantitative Approach for Characterizing Schemas. Paper Prepared to the Society for Psychotherapy Research Meeting, Ulm, West Germany.

Horowitz, M.J., Markman, H., Tunis, S., & Ghannam, J.H. (1986). Towards a Theory of Defense Classification. Paper presented at Yale University, MacArthur Foundation Conference on Repression, 1986.

Ghannam, J.H. (1985). Psychoanalysis as a Science: Ontology Versus Methodology. American Psychological Association Annual Convention, Los Angeles, California.

Ghannam, J.H. (1984b). The Function of Speech in Psychoanalysis: An Empirical Study. American Psychological Association Annual Convention, Toronto, Canada.

Ghannam, J.H. (1984a). Speech Clarity: A Measure of the Psychotherapeutic Process. international Society for Psychotherapy Research, Annual Convention; Banff, Canada.

Ghannam, J.H. (1983). Research in Psychoanalysis: A Methodological Evaluation. American Psychological Association Annual Convention; Anaheim, California

Ghannam, J.H. (1983). A Critical Evaluation of Neurobiological Plasticity: Criteria for a Comprehensive Model for the Recovery of Function. International Neuropsychological Society Convention, Lisbon, Portugal.

Ghannam, J.H. (1983). Theoretical Perspectives on the Recovery of Cognitive Functions after CNS Insult. California State Psychological Association Annual Convention, San Francisco, California.

Papsdorf, J.D. & Ghannam, J.H. (1978). Asymmetric Digit Response to Test Anxiety Imagery. Southeastern Psychological Association National Convention, Atlanta, Georgia.

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Papsdorf, J.D. & Ghannam, J.H. (1978). Test Anxiety and Hemispheric Specialization: Implications for Research. Southeastern Psychological Association National Convention, Atlanta, Georgia.

Papsdorf, J.D. & Ghannam, J.H. (1977). Test Anxiety and Lateral Eye Movements. American Psychological Association, Annual Convention, San Francisco, California.

### **Invited Lectures and Panels**

US Department of Labor, Psychological Work-Related Issues – Is it TBI, PTSD, or Merely a General Psychiatric Diagnosis?. San Francisco, September, 2016.

University of California San Francisco, San Francisco General Hospital, General Rounds. Confronting Hate and Islamophobia in the Workplace. April, 2016.

Yale University, Moral Economies and Social Change. Humanitarian Responses in the Wake of Catastrophe. September, 2015.

San Francisco General Hospital, Grand Rounds. Islamophobia and Hate Crimes. October, 2015.

American Studies Association Annual Meeting, The Indivisibility of Justice: Palestine in the American Imaginary. The Health Effects of the Gaza Invasion and Siege on Palestinians, San Antonio, November, 2010.

Psychologists for Social Responsibility, Panel Discussion, New Directions for The Anti-Torture Movement, July 2010

The Psychiatric AME/QME Report and the GAF. California Association of Applicant Attorneys. Oakland, California. July 2010.

International Day in Support of Victims of Torture, Panel Discussion, Amnesty International, San Francisco, CA, June, 2010

Western Regional International Health Conference, "War & Global Health: Transforming our professions, Changing our World". Health Professionals and Torture: Perpetrators, Activists, and Healers, University of Washington, April, 2010

University of California Berkeley, School of Public Health. "The Mental Health Effects of Torture in Guantanamo". March 2010

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Commonwealth Club, San Francisco. The Quest for Palestinian National Identity, Panel discussion, 2009

University of California San Francisco, School of Medicine, Physicians for Social Responsibility, "Health, Human Rights and Social Responsibility: The Humanitarian Crisis in Gaza, 2009.

Claremont Collage, Scripps Campus, "Health, Human Rights and Social Responsibility: The Humanitarian Crisis in Gaza, 2009.

University of California Davis, "Health, Human Rights and Social Responsibility: The Humanitarian Crisis in Gaza, 2009.

UC Berkeley, Boalt Law School, Symposium on "Overcoming Divisions Within Communities of Color, February, 2008.

UCSF School of Medicine Symposium on Health Effects of War, "The Psychiatric Effects of War and Occupation", 2007,2008

University of Nevada, Reno School of Medicine. "Health and Mental Health Effects of War and Occupation", 2007.

University of California, San Francisco Global Health Sciences, Seminar on Global Health, "Mental Health Research and Practice Globally", 2004, 2005, 2006, 2007,2008,2009, 2010, 2011, 2012, 2013, 2014, 2015.

Department of Psychiatry, UCSF, "Cultural and Clinical Competence in Working with Arab and Muslim Americans." 2002,2003, 2004

Tenderlion Clinic, "Cultural and Clinical Competence in Working with Arab and Muslim Americans." 2001, 2002, 2003

Department of Equal Employment (EEOC), San Francisco, "Cultural and Clinical Competence in Working with Arab and Muslim Americans." 2002

Department of Psychiatry, San Francisco General Hospital, Psychiatric Emergency Services, "Traumatic Effects of Racial Profiling and Hate Crimes", October, 2002

Department of Psychiatry, San Francisco General Hospital Grand Rounds, "Traumatic Effects of Racial Profiling and Hate Crimes", 2001

School of Social Welfare, University of California, Berkeley, "Psychoanalytic Perspectives in Working With Older Adults", 2000

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San Francisco Psychoanalytic Institute, Friends Society, "Money, Class, and Resistance", 2000

Department of Orthopedic Surgery, UCSF, Grand Rounds, "Psychological Care of the Poly-Traumatized Patient", 1998

American Academy of Orthopedic Surgeons, "Psychological Care of the Poly-traumatized Patient", San Francisco, 1997

Wright Institute, Berkeley, California. "What is Psychoanalysis", 1995, 1996, 1997, 1998

Pacific Gas, & Electric Company, System Wide Symposium on "Coping with Depression in the Workplace". 1997

UCSF Brown Bag Lecture. "Advances in the Treatment of Depression". 1997

UCSF Healthy Aging Series, UCSF Medical Group. "Coping with Loss and Change". 1994, 1995, 1996

UCSF Center on Aging, Geriatric Noon Conference, "Depression in the Elderly". UCSF Mount Zion Medical Center, 1996

UCSF Mount Zion, Department of Medicine, Noon Conference, "Advances in the Treatment of Depression", 1996

University of California, San Francisco, Center on Aging, Symposium on Chronic Illness and Depression in the Elderly. "The Treatment of MDD in the Elderly Cardiac Patient". 1994

Eureka General Hospital and Mad River Community Hospital, "Diagnostic Psychological Evaluations", Medical Grand Rounds, 1991

The Wright Institute, Berkeley, "Crisis Intervention", 1990

University of California, Berkeley, Department of Psychology Colloquium, "Informed Consent with Involuntarily Detained Psychiatric Patients", 1989.

University of California, Berkeley, Department of Psychology, Clinical Psychology Program Conference, "Epidemiology and Psychodynamics of Suicide ", 1989

San Francisco General Hospital, Department of Psychiatry, Consultation-Liaison Service, Post-Traumatic Stress Disorder and Severe Personality Pathology, 1988.

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Highland General Hospital, Department of Medicine, Grand Rounds, "Post-Traumatic Stress Disorders in Medical Practice, 1988

Mount Zion Hospital and Medical Center, Department of Psychiatry , Grand Rounds. "Research into the Supervisory Experience." (with Drs. Schupak and Marrott), 1988

San Francisco State University, Department of Psychology, Clinical Case Conference. Invited consultant to clinical graduate students, 1988

University of California, Berkeley, Department of Psychology. "Suicide: Theory, Assessment, and Intervention." Presented to faculty and graduate students in clinical psychology, 1987

Wells Fargo Employee Assistance Services, "Psychodynamic Principles of Individuals in Organizations." Presented to the clinical staff, 1987

San Francisco State University, Department of Psychology. "Psychoanalytic Psychotherapy. Theory and Technique." Presented to advanced graduate students in clinical psychology, 1987

Tenderloin Clinic, San Francisco, "Psychodynamic Treatment of Severe Personality Disorders." Presented to staff and trainees, 1986

Wells Fargo Employee Assistance Services, "Psychodynamic Principles of individuals in Organizations." Presented to the clinical staff, 1986

San Francisco State University, Department of Psychology, "Psychoanalytic Psychotherapy: Theory and Technique." Presented to advanced graduate students in clinical psychology, 1986

San Francisco Psychoanalytic Institute, "The Evolution of the Theme of Castration in Freud's Writings." Presented to first year candidates, course on Oedipal Development, 1985

San Francisco State University, Department of Psychology, "Psychoanalytic Psychotherapy: Theory and Technique." Presented to advanced graduate students in clinical psychology, 1985

San Francisco Psychoanalytic Institute, "The Evolution of the Theme of Castration in Freud's Writings." Presented to first year candidates, course on oedipal development", 1984

San Francisco State University, Department of Psychology, "Psychoanalytic

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Psychotherapy. Theory and Technique." Presented to advanced graduate students in clinical psychology, 1984

San Francisco State University, Department of Psychology, "Psychoanalytic Psychotherapy. Theory and Technique." Presented to advanced graduate students in clinical psychology, 1983

### **Teaching Experience**

Health Consequences of Occupation and War, University of California, Berkeley, School of Public Health. Course Instructor and Lecturer. 2010

Post-Colonial Formulations of Arab and Arab American Identity, SFSU Ethnic Studies, 2003, 2004, 2005, 2006, 2007

Advanced Seminar in Geropsychology. Post-Doctoral Fellows, UCSF Institute on Aging, 1999-2002

Continuous Case Conference, Advanced Interns, UCSF-Stanford Health Care, Department of Psychiatry, 1995-2000

Introduction to Clinical Psychology and the DSM4, Diploma Programme, Gaza Community Mental Health Programme, Gaza, 1996-Current.

Introduction to Psychoanalysis, Department of Psychiatry, University of California, San Francisco, Mount Zion Campus, 1992-2000

Psychoanalytic Theories: Five Perspectives. Department of Psychiatry, California Pacific Medical Center, 1991-1995

Core Readings and Case Conference in Psychoanalytic Psychotherapy. Department of Psychiatry, Mount Zion Hospital and Medical Center of UCSF, 1990-2000

Introduction to the Work of Lacan Mount Zion Crisis Clinic, 1991

Theoretical and Technical Considerations in the Treatment of Character Pathology, Department of Psychiatry, Mount Zion Hospital and Medical Center, 1989, 1990

Diagnostic Neuropsychological and Psychological Differential Diagnosis Department of Psychiatry, Crisis Clinic, Mount Zion Hospital and Medical Center, 1989-1990



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Fundamentals of Psychopathology Third year Clerkship in Psychiatry, Department of Psychiatry, University of California, San Francisco, 1989-1994

Introduction to Clinical Psychology, Department of Psychology, University of California, Berkeley, 1989

Treatment of Severe Personality Disorders. Department of Psychiatry, Mount Zion Hospital and Medical Center, San Francisco, 1988

Psychiatric Aspect of Medical Practice. University of California, San Francisco and Mount Zion Hospital, 1987, 1988

Seminar Leader, Psychiatry 100A and 100B - Introduction to Psychiatry. Department of Psychiatry, University of California, San Francisco, 1986, 1987, 1988

Introduction to Masochism and Object Relations, Department of Psychiatry, Mount Zion Hospital and Medical Center, 1986,1987

Training Seminar, Crisis Clinic, Department of Psychiatry, Mount Zion Hospital and Medical Center, 1986, 1987, 1988

Teaching Associate, Seminar on Research Methods. Department of Health and Medical Sciences, University of California, Berkeley, Winter 1981, Spring 1981, Fall 1981, Winter 1982, Fall 1982, Winter 1983, Spring 1983

Teaching Assistant, Introduction to Psychology-Department of Psychology, University of California, Berkeley, Fall 1980, Spring 1981, Fall 1981, Winter 1982

Teaching Assistant, Department of Psychology, University of Michigan, Fall 1978, Winter 1979

### **Research-Experience**

Project on the Psychological and Psychiatric Consequences of Detention and Release from Guantanamo, Collaborative project with the UC Berkeley School of Law International Human Rights Law Clinic and Human Rights Center, 2009-Current.

Project on Differential Cancer Rates Using GIS in Palestine, UCSF, 2008-Current

Project on the Traumatic Effects of War and Occupation, Gaza Community Mental Health Program, 1996-Current

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Project on Burnout Among Medical Residents, Hamad Medical Center, Doha, Qatar, 2013-Current

Project on Quality of Life Outcomes in Differential Treatments of Lung Cancer, with David Jablons, UCSF Department of Surgery, 1997-2000.

Project on Psychiatric Co-morbidity of Dermatology Disorders, with Tim Berger, Department of Dermatology, UCSF, 1995-2000

Member, Alzheimer's Project, Center for Clinical Aging Services Research, UCSF Institute on Aging, San Francisco, 1990-2000

Member, Geriatric Depression Project, Institute on Aging and Department of Psychiatry, University of California, San Francisco, 1990-2000

Member, Berkeley Psychotherapy Project, Department of Psychology, University Of California, Berkeley, 1989-1992

Co-Director, Project on Duty to Warn with Psychiatric Liaison Unit, 1988-1991

Co-Director, Project on the Study of Informed Consent, Department of Psychiatry, Mount Zion Hospital and Medical Center, San Francisco, 1988-1991

Residential Scientist, MacArthur Foundation Program on Conscious and Unconscious Mental Processes, Langley Porter Psychiatric Institute, University of California, San Francisco, 1984-1989

Joint Project on Neural Correlates Unconscious Mental Processes (with Drs. Ben Libet and Howard Shevrin), University of California, San Francisco and University of Michigan, 1981-1988

Research Project on Medical Student Supervision (with Dr. Mel Schupack), Department of Psychiatry , Mount Zion Hospital and Medical Center, 1984-1989

Communication Mismatches in Depression, Department of Psychology, Stanford University, 1984-1985

Interpersonal Correlates of Process and Outcome in Psychotherapy (with Dr. Leonard Horowitz), Stanford University and Kaiser Hospital, 1984-1985

Co-Director, Project on the Use of Computer Technology in the Rehabilitation and Recovery of Cognitive Functions After Central Nervous System Insult, Departments of Psychiatry, Neurology, and Rehabilitative Medicine, Mount Zion Hospital and Medical Center, 1983-1984

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Psychotherapy Research Project (with Dr. Enrico Jones), Department of Psychology, University of California, Berkeley, 1983-1984

Member (with Drs. Weiss and Sampson), Mount Zion Psychotherapy Research Group, 1981-1989

Staff Research Associate I (with Alan Gevins), EEG Systems Laboratory, Langley Porter Psychiatric Institute, University of California, San Francisco, 1980-1982

Research Assistant (with Dr. Enoch Callaway), Department of Psychiatry, University of California, San Francisco, 1980

Research Assistant (with Dr. Sheldon Korchin), Department of Psychology, University of California, San Francisco, 1980

Research Assistant (with Dr. Howard Shevrin), Adult Psychiatric Hospital, University of Michigan, 1979

Research Assistant (with Dr. Aaron Smith), Neuropsychological Laboratory, University of Michigan, 1979

Consultant, Mental Health Unit, Milan Federal Prison, 1978-1979

Research Assistant (with Dr. James Papsdorf), Laboratory of Applied Psychology, University of Michigan, 1977-1979

Research Assistant (with Dr. Howard Shevrin), Neuropsychiatric Institute, Department of Psychiatry, University of Michigan, 1978-1979

Research Fellow (with Dr. James Papsdorf), Institute of Human Adjustment, University of Michigan, 1977-1978

### **Supervision Experience**

Supervision of Medical Students and GHS Students, University of California, San Francisco, 1997 - Current

Supervision of Psychiatric Residents, Department of Psychiatry, University of California, San Francisco, 1986-Current

Supervision of UCSF Medical Students, Department of Psychiatry, Mount Zion Hospital and Medical Center, San Francisco, 1983-2009

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Supervision of Pre- and Post-Doctoral Students, Department of Psychiatry, Mount Zion Campus, University of California, San Francisco, 1989-2000

Supervision of Interns, Wright Institute, Berkeley, CA, 1992-2010

Supervision of Psychology and Psychiatry Trainees, Department of Psychiatry, California Pacific Medical Center, 1991 -1993

Supervision of Psychology Trainees, Department of Psychiatry, San Francisco veterans Administration Hospital, 1988-1992

Supervision of Trainees, Department of Psychiatry, Mount Zion Hospital and Medical Center, San Francisco, 1983-1989

Supervision of Post-Doctoral Trainees, Outpatient Department of Psychiatry, Mount Zion Hospital and Medical Center, San Francisco, 1984-1989

Supervision of Clinical Graduate Students, Department of Psychology, San Francisco State University, San Francisco, 1983-1985

### **Workshops**

Cultural and Clinical Competence in Working with Arab and Muslim Americans, San Francisco Community Mental Health and the San Francisco Department of Public Health, 2002,2004.

Psychoanalysis and Art: The Re-Embodiment of Desire. Morphos Gallery and Somar,1994. Co-Chair.

California State Psychological Association, Current Trends in Mental Health and the Law, San Francisco, 1989, Chair

Protection and Advocacy Services, Informed Consent, Invited Address, 1989

California State Psychological Association, The Anatomy of Duty-to-Warn: Clinical and Legal Foundations, San Francisco, 1989, Chair

Society for Psychotherapy Research, Text Analytic Approaches in Psychotherapy, Toronto, 1989, Participant

### **Committees**

Ghannam, Jess  
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Center for Community Engagement, Faculty Co-Chair, University of California, San Francisco, 2016-Current

Board of Trustees, Sofia University, 2016-Current.

Chancellor's Committee on Climate and Diversity, University of California, San Francisco, 2010-Current

University Community Partnerships Council, University of California, San Francisco, 2010-Current

Geriatric Advisory Committee, UCSF-Stanford Health Care, 1997-2000

HIV Advisory Committee, Mount Zion Medical of the University of California, San Francisco, 1991-1997

Collaborative practice committee, AIDS Unit, Mount Zion Hospital and Medical center of UCSF, 1990-1997

Collaborative practice committee, 4 East Telemetry Unit, Mount Zion Hospital and Medical center of UCSF, 1990-1997

Chairman, Utilization Review Committee, Crisis Clinic, Department of Psychiatry, Mount Zion Hospital and Medical Center, 1986-1991

### **Organizational Consultation**

Hospital consultant for administration, nursing, and medical staff, Mount Zion Hospital and Medical Center of UCSF, 1990-1997

Hospital consultant for administration and nursing, Moffitt-Long Hospital, University of California, San Francisco, 1991-1997

Consultant, Employee Assistance Services, Wells Fargo Bank, 1986, 1987, 1995

Consultant, Mental Health Unit, Milan Federal Prison, Milan, Michigan, 1978-1979

### **Professional and Society Memberships**

Member, Health Professionals Against Torture

Member, Phi Beta Kappa Honor Society

Member, Division 39; American Psychological Association

Member, American Psychological Association

Member, Sigma XI Scientific Society

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Member, International Society for Psychotherapy Research  
Member, California Society of Industrial Medicine and Surgery  
Member, Psychologists for Social Responsibility

### **Radio and Television Experience**

Commonwealth Club  
KPOO Radio  
BBC Radio and Television  
Al Jazeera English  
Air America Radio WBAI, New York, Invited Guest, 2004  
Free Speech Radio, Invited Guest, 2004  
WorldLink TV, Invited Guest  
KQED Radio, Invited Guest on Perspectives on the War  
KCSM TV, Invited Guest on Racial Profiling  
KALW Radio, Invited Guest on Racial Profiling  
KQED Radio, Invited Guest on Racial Profiling  
BAY TV, Invited Guest on Depression in the Elderly  
BAY TV Invited Guest on Seasonal Affective Disorder  
KGO Talk Radio, Invited Discussant on Depression  
KCBS Radio, Invited discussant on Depression  
KGO Talk Radio, Invited discussant on Addictions  
KQED Radio, Invited discussant on Work Stress

### **Medical-Legal and Forensic Experience**

Expert Witness, National Security Cases Requiring TS/SCI Level Clearance (DoD and DoJ)  
Worker's Compensation, Evaluation, Treatment, and Testimony.  
Expert Witness, Testimony, Evaluation, and Deposition, State and Federal Courts.

Qualified Medical Evaluator, Agreed Medical Evaluator, Independent Medical Evaluator

### **Grants and Awards**

Mount Zion Hospital and Medical Center Research Fund, San Francisco, for studying the informed consent process in psychiatric patients, 1988

Mount Zion Hospital and Medical Center Research Fund, San Francisco, for studying the characteristic of HIV infected individuals in emergency psychiatric

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facilities, 1989.

Fluoxetine/Placebo Trial in Geriatric Patients with MDD. Eli-Lilly, 1990

Mount Zion Health Systems, Grant for the implementation of psychiatric services for Russian Immigrants, 1994-1998.

A Placebo Controlled Comparison of Nefazadone and Fluoxetine in the Treatment of Elderly Patients with Major Depressive Illness. Bristol-Meyers Squibb 1991

An Open Label Multicenter Trial of Nefazodone in the Treatment of Patients with Mood Disorders. Bristol-Myers Squibb. 1991

A Multicenter Trial of t Efficacy of Extended-Release Oral Physostigmine in Alzheimer's Disease and Senile Dementia of t Alzheimer Type. Forest Laboratories, 1993

Efficacy and Safety Study of Besipirdine hydrochloride (HP 749) in Patients with Alzheimer's Disease. Hoechst-Roussel Pharmaceuticals, Inc., 1993

A Multicenter, Double-Blind Trial to Evaluate the Efficacy and Safety of Two Dose Ranges of Buspirone HCl (15-35mg and 40-60mg) Compared to Placebo in the Management of Agitated Behavior in Patients with Dementia of the Alzheimer's Type, Multi-Infarct Dementia, or Mixed-Type Dementia. Bristol-Myers Squibb Company, 1994

Longitudinal Study of Adrenocorticoids & Functioning in Alzheimer's Disease. Alzheimer's Association, 1995

Double-Blind Controlled Study of Venlafaxine and Fluoxetine in Geriatric Outpatients with Major Depression, 1996

A 48 Week Study to Compare Efficacy and Safety of Propentofylline (HW A285) with Placebo in Outpatients with Alzheimer's Disease, 1996

A 24 Week Study to Compare Efficacy and Safety of Propentofylline (HW A 285) with Placebo in Outpatients with Vascular Dementia, 1996

A Randomized, Double-Blind, Placebo Controlled Evaluation of t Effects of Donepezil Hydrochloride (E2020) in the Management of Patients in a Nursing Home Facility, Eisai, Inc., 1996

Evaluation of the Efficacy and Safety of Donepezil Hydrochloride (E2020) in Patients with Dementia Associated with Cerebrovascular Disease. Pfizer

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Pharmaceutica1s, 1996

A Multicenter, Double-Blind Comparison of Efficacy and Safety of Seroquel, Haloperidol, and placebo in the treatment of elderly subjects residing in nursing homes or assisted care facilities and presenting with Alzheimer's Dementia and psychoses or other selected psychoses. Zeneca Pharmaceuticals, 1997

### **Community Service**

Numerous and extensive invited talks on depression, coping with stress, adjustment issues related to aging and coping with hate crimes. These activities have taken place in community centers and places of secondary education in San Francisco, Marin, and Alameda counties.

Professional References: Available upon request



**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Criminal No. 1:16CR143</b>
	)	
<b>MOHAMAD JAMAL KHWEIS,</b>	)	<b>UNDER SEAL</b>
	)	
<b>Defendant.</b>	)	

**DEFENDANT’S POSITION ON SENTENCING – EXHIBIT C**

**Evaluation Report from Jess Ghannam, PhD, MSc, QME**

**[FILED UNDER SEAL]**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**UNITED STATES OF AMERICA**

**v.**

**MOHAMAD JAMAL KHWEIS,**

**Defendant.**

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**Criminal No. 1:16CR143**

**DEFENDANT’S POSITION ON SENTENCING – EXHIBIT D**

**Sentencing Chart**

NAME	CASE No.	OFFENSE	PLEA	SENT.	BASIC FACTS
Bilal Abood	3:15-cr-256 (N.D. Tex.)	18 U.S.C. §1001 False Statements	G	48 Months	Traveled to Syria in 2013 and then returned to the US. In 2014 tweeted, " I pledge obedience to the Caliphate Abu Bakr al-Baghdadi." Attempted to board an int'l flight, but stopped at airport. Lied to FBI about purpose of travel, which was to fight Syrian regime of Al-Assad. <i>See</i> ECF No. 33.
Haniffa Bin Osman	1:06-cr-00416 (D. Md.)	18 USC §2339B Conspiracy to Provide Material Support to FTO; 18 USC §1956 Money Laundering	G	37 Months	Conspired with Wotulo, Subandi, and Varatharasa, and Naidu to provide material support to Tamil Tigers, an FTO, and attempted to illegally export arms, including state of the art firearms, grenade launchers, night vision devices, surface to air missiles and unmanned aerial vehicles. Discussed illegality of the transfer of the arms to the Tamil Tigers w/ UC and provided navigational coordinates for a delivery in the Indian Ocean. Traveled to Guam inspected machine guns, sniper rifles and ammunition, two surface to air missiles, and agreed to communicate with others within the Tamil Tigers about the availability and pricing of the missiles. Arranged for the transfer of over \$1 million to undercover bank account. <i>See</i> Oct.30, 2008 DOJ Press Release #08-969.
Erick Wotulo	1:06-cr-00416 (D. Md.)	18 USC §2339B Conspiracy to Provide Material Support to FTO; 18 USC §1956 Money Laundering	G	30 Months	(see above)
Haji Subandi	1:06-cr-00416 (D. Md.)	18 USC §2339B Conspiracy to Provide Material Support to FTO; 18 USC §1956 Money Laundering	G	37 Months	(see above)
Thirunavukarasu Varatharasa	1:06-cr-00416 (D. Md.)	18 USC §2339B Conspiracy to Provide Material Support to FTO; 22 USC §2778 Attempted Export of Arms & Munitions	G	57 Months	(see above)
Balraj Naidu	1:08-cr-00091 (D. Md.)	18 USC §2339B(a)(1); 18 USC §2339A(b)(1) Conspiracy to Provide Material Support to FTO	NG - jury trial	57 Months	Tamil Tigers financier who conspired w/ Bin Osman, Haji Subandi, Erick Wotulo and Thirunavukarasu Varatharasa to provide over a million dollars worth of weapons to Tamil Tigers. After 28 tons of weapons and ammunition were airlifted to Guam, co-conspirators inspected weapons, and wired UC's additional money. Co-conspirators (above) were arrested. Subsequent investigation led to Naidu's arrest. <i>See</i> December 16, 2010 Md. U.S. Attorney's Office Press Release.

Abdirizak Mohamed Warsame	0:16-cr-00037 (D. Minn.)	18 USC §2339B Providing Material Support or Resources to Designated FTO	G	30 Months	Part of a group of individuals who sought to travel to Syria to fight with the designated foreign terrorist organization. Participated in meetings with a group of individuals who wished to travel to Syria to join ISIL. Discussed means of funding travel to Syria and potential routes from Minnesota to Syria to elude law enforcement. Applied for expedited passport to travel to join ISIL, provided approx. \$200 to co-conspirator for fees expedited passport application so he could travel to Syria to joining ISIL. <i>See</i> ECF No. 67.
Alexander E. Blair	5:15-cr-40031 (D. Kan)	18 U.S.C. §371 Conspiracy	G	15 Months	Conspired with another man who devised a plot to detonate a vehicle bomb at Fort Riley military base. Asked after he was arrested about the fact Co-conspirator's plan called for America service members to die in the bombing, Blair said: "That's what they signed (up) for." (co-conspirator received 360 months). <i>See</i> ECF No. 49.
Earnest James Ujaama	2:02-cr-00283 (W.D. Wash)	31 USC §545.204; 31 USC §545.206(b); 50 USC §1705(b) violation of the International Emergency Economic Powers Act (material support and 924(c) charges dismissed)	G	24 Months	Conspired to provide goods and services to the Taliban. <i>See</i> ECF No. 75.
Mark Robert Walker	3:04-cr-02701 (W.D. Tex.)	50 USC §1705.F Attempting to make a Contribution of Goods or Services to a Specially Designated Terrorist Organization	G	7 Months and 49 Days	Detained at the airport with \$2,200 he intended to provide a designated terrorist organization (Al-Ittihad Al-Isiami in Somalia). <i>See</i> ECF No. 20.
Ahmed Hussein Mahamud	0:11-cr-00191 (D. Minn.)	18 USC §2339B (a)(1) Conspiracy to Provide Material Support to FTO	G	36 Months	Conspired to provide money and people to al-Shabaab. Assisted with fundraising under false pretenses, when, in fact, money was to purchase airline tickets and pay expenses for men who traveled to join al-Shabaab. Conspired to send money to an al-Shabaab fighter to assist in buying weapons. <i>See</i> ECF No. 78.
Salah Osman Ahmed	0:09-cr-0050 (D. Minn.)	18 USC §2339A(a) Providing Material Support to Terrorists	G	36 Months	Conspired to provide money and people to al-Shabaab. Raised money from the Somali-American community under false pretenses. Traveled from Minneapolis to fight in Somalia. While in Somalia, received basic training from al-Shabaab on AK-47s, rocket-propelled grenades, and machine guns. Assisted in building a training camp for al-Shabaab, before quitting camp with Isse. <i>See</i> ECF No. 138.

Abdifatah Yusuf Isse	0:09-cr-0050 (D. Minn.)	18 USC §2339A(a) Providing Material Support to Terrorists	G	36 Months	Conspired to provide money and people to fight in Somalia. Traveled to Somalia and joined al-Shabaab. While there, participated in fund-raising calls back to US to garner money to purchase AK-47 rifle. Stayed at al-Shabaab safe house and briefly attended an al-Shabaab training camp before quitting. <i>See</i> ECF No. 137.
Nima Ali Yusuf	3:10-cr-04551 (S.D. Cal.)	18 USC §2339B(a)(1) Conspiracy to Provide Material Support to FTO	G	96 Months	Conspired with Isse (above) and others. Sent approx. \$1,450 to men fighting in Somalia for al Shabaab, and to lied to federal agents about it. Tried to help co-conspirator recruit a local man to go and fight for al Shabaab. When co-conspirator told Yusuf that al Shabaab had completed a successful “martyrdom operation” in which Burundian peacekeeping troops were killed, Yusuf responded, “Oh my God. God is great. Wonderful. I swear to God, you told me something to be happy about.” <i>See</i> Dec.11, 2012 DOJ/FBI press release.
Omer Abdi Mohamed	0:09-cr-00352 (D. Minn.)	18 USC §2339A(a) Conspiracy to Provide Material Support to Terrorists	G (1 day before trial)	144 Months	Member of a conspiracy that recruited young men of Somali descent to travel to Somalia to fight against Ethiopian troops, who were in Somalia assisting the internationally recognized Transitional Federal Government (“TFG”) of Somalia. Mohamed admitted assisting the men in planning their trips, knowing that once in Somalia, the men intended to murder, kidnap, or maim Ethiopian and Somali government troops. <i>See</i> ECF No. 172
Mohammed Hamzah Khan	1:14-cr-00564 (N.D. Ill.)	18 USC §2339B (attempt) Conspiracy to Provide Material Support to Terrorists	G	40 Months	Arrested at airport attempting to join ISIL in Syria with his two minor siblings in tow. Spent months using online alyseses to coordinate logistics with ISIL members for admission into Syria. <i>See</i> ECF No. 81.
Shannon Maureen Conley	1:14-cr-00163 (D. Colo.)	Conspiracy 18 USC §371 to violate 18 USC §2339B Conspiracy to Provide Material Support to Terrorists	G	48 Months	Arrested at airport attempting to join ISIS in Syria. Coordinated her travel online with other ISIS members. Joined the U.S. Army Explorers to be trained in U.S. military tactics and in firearm prior to joining ISIS Also obtained first aid/nursing certification and National Rifle Association certification. <i>See</i> ECF No. 37.
Hassan Moussa Makki	2:03-cr-80079 (E.D. Mich.)	18 USC §1962(d) Conspiracy to Violate the Racketeer Influenced and Corrupt Organization Act (RICO);18 USC §2339B(a)(1) Providing Material Support to FTO	G	57 Months	Provided material support to Hizbollah. <i>See</i> June 23, 2006 DOJ press release #06-389

Ilyas Ali	3:02-cr-02912 (S.D. Cal.)	21 USC §846; 21 USC §841(a) Conspiracy to Distribute Heroin and Hashish, 18 USC §2339B Providing Material Support to Terrorists	G	57 Months	Involved in an international drugs-for-weapons program. <i>See</i> June 23, 2006 DOJ press release #06-389.
Saifullah Durrani	3:02-cr-02912 (S.D. Cal.)	21 USC §846; 21 USC §841(a) Conspiracy to Distribute Herion and Hashish; 18 USC §2339B Providing Material Support to Terrorists	G	57 Months	Involved in an international drugs-for-weapons program. <i>See</i> June 23, 2006 DOJ press release #06-389.
Javed Iqbal	1:06-cr-01054 (S.D.N.Y)	18 USC §2339B Providing Material Support to Terrorists	G	69 Months	Provided satellite transmission services to Hizbollah TV station, al-Manar, in exchange for thousands of dollars. Attempted to disguise signal throughout. <i>See</i> ECF No. 107.
Saleh Elahwal	1:06-cr-01054 (S.D.N.Y)	18 USC §2339B Providing Material Support to Terrorists	G	17 Months	Partners with Iqbal (above). <i>See</i> ECF No. 107.
Carmen Maria Ponton Caro	1:06-cr-20001 (S.D. Fla.)	18 USC §2339A.F Providing Material Support to Terrorists	G	70 Months	Leaders of an alien smuggling organization. obtained fraudulent Colombian and Spanish passports. circumvented Colombian airport immigration controls and smuggled the purported terrorists to the United States. Provided material support to the FARC, an FTO. <i>See</i> Feb. 29, 2008 DOJ Press Release #08-156.
Victor Daniel Salamanca	1:06-cr-20001 (S.D. Fla.)	18 USC §2339A.F Providing Material Support to Terrorists	G	70 Months	Leaders of an alien smuggling organization. obtained fraudulent Colombian and Spanish passports. circumvented Colombian airport immigration controls and smuggled the purported terrorists to the United States. Provided material support to the FARC, an FTO. <i>See</i> Feb. 29, 2008 DOJ Press Release #08-156.
Jalal Sadat Moheisen	1:06-cr-20001 (S.D. Fla.)	18 USC §2339A.F Providing Material Support to Terrorists	G	70 Months	Leaders of an alien smuggling organization. obtained fraudulent Colombian and Spanish passports. circumvented Colombian airport immigration controls and smuggled the purported terrorists to the United States. Provided material support to the FARC, an FTO. <i>See</i> ECF No. 223.
Julio Cesar Lopez	1:06-cr-20001 (S.D. Fla.)	18 USC §2339A.F Providing Material Support to Terrorists	G	Time-Served	In conspiracy w/ above. <i>See</i> Feb. 29, 2008 DOJ Press Release #08-156.
Bernardo Valdes Londono	1:06-cr-20001 (S.D. Fla.)	18 USC §2339A.F Providing Material Support to Terrorists	G	30 Months	In conspiracy w/ above. <i>See</i> ECF No. 197.
Jose Tito Libio Ulloa Melo	1:06-cr-20001 (S.D. Fla.)	18 USC §2339A.F Providing Material Support to Terrorists	G	30 Months	In conspiracy w/ above. <i>See</i> ECF No. 210.
Luis Alfredo Daza Morales	1:06-cr-20001 (S.D. Fla.)	18 USC §2339A.F Providing Material Support to Terrorists	G	30 Months	In conspiracy w/ above. <i>See</i> Feb. 29, 2008 DOJ Press Release #08-156.

Carlos Adolfo Romero-Panchano	4:03-cr-00182 (S.D. Tex)	18 USC §2339B.F Conspiracy to Provide Material Support and Resources to FTO	G	61 Months	Supplied material support to a terrorist organization (the United Self-Defense Forces (AUC) of Colombia) through a weapons-for-drugs conspiracy. <i>See</i> ECF No. 55.
Fanny Cecilia Barrera de Amaris	4:03-cr-00182 (S.D. Tex)	18 USC §2339B.F Conspiracy to Provide Material Support and Resources to FTO	G	36 Months	Supplied material support to a terrorist organization (the United Self-Defense Forces (AUC) of Colombia) through a weapons-for-drugs conspiracy. <i>See</i> ECF No. 55.
Yahya Goba	1:02-cr-00214 (W.D.N.Y.)	18 USC §2339A.F Providing Material Support to Terrorists	G	120 Months	Attended a military-type al Qaeda terrorist training camp, specifically the al Farooq camp associated with Osama bin Ladin in Afghanistan. <i>See</i> June 23, 2006 DOJ press release #06-389
Sahim Alwan	1:02-cr-00214 (W.D.N.Y.)	18 USC §2339A.F Providing Material Support to Terrorists	G	114 Months	Attended a military-type al Qaeda terrorist training camp, specifically the al Farooq camp associated with Osama bin Ladin in Afghanistan. <i>See</i> June 23, 2006 DOJ press release #06-389
Shafal Mosed	1:02-cr-00214 (W.D.N.Y.)	18 USC §2339A.F Providing Material Support to Terrorists	G	96 Months	Attended a military-type al Qaeda terrorist training camp, specifically the al Farooq camp associated with Osama bin Ladin in Afghanistan. <i>See</i> June 23, 2006 DOJ press release #06-389
Yasein Taher	1:02-cr-00214 (W.D.N.Y.)	18 USC §2339A.F Providing Material Support to Terrorists	G	96 Months	Attended a military-type al Qaeda terrorist training camp, specifically the al Farooq camp associated with Osama bin Ladin in Afghanistan. <i>See</i> June 23, 2006 DOJ press release #06-389
Mukhtar al-Bakri	1:02-cr-00214 (W.D.N.Y.)	18 USC §2339A.F Providing Material Support to Terrorists	G	120 Months	Attended a military-type al Qaeda terrorist training camp, specifically the al Farooq camp associated with Osama bin Ladin in Afghanistan. <i>See</i> June 23, 2006 DOJ press release #06-389
Mohammed Abdullah Warsame	0:04-cr-00029 (D. Minn.)	18 USC §2339B Conspiracy to Provide Material Resources and Support to a Designated FTO	G	92 Months	Conspired with others to provide material support to al-Qaeda in the form of personnel, training and currency. Traveled to Afghanistan to attend an al-Qaeda training camp outside Kabul where he trained along other jihadists for 5 months. Then traveled to the al Faruq training camp, where he received further training and met Osama Bin Laden, shared a meal with him, and told agents he found Bin Laden to be very inspirational. Subsequently worked at an al-Qaeda guesthouse and clinic. Returned to US, sent money to a former training camp commander. <i>See</i> ECF No. 171.

Avin Marsalis Brown	5:14-cr-00058 (E.D.N.C.)	18 USC §2339A.F Conspiracy to Provide Material Support and Resources, knowing and intending that they be used in preparation for, and in carrying out, a violation of 18 USC §956 (conspiracy to kill or maim persons outside the United States.)	G	92 Months	Spoke to undercover about desire to fight overseas in Syria or Yemen with groups including al-Qaeda in the Arabian Peninsula (AQAP), the Islamic State of Iraq and Sham (ISIS), and jabhat al-Nusrah (JAN). Discussed weapons in Jordan's possession including AK-47, and how he would not hesitate to use them. Arrested at airport trying to board flight to Turkey. <i>See</i> ECF No. 1.
Akba Jihad Jordan	5:14-cr-00058 (E.D.N.C.)	18 USC §2339A.F Conspiracy to Provide Material Support and Resources, knowing and intending that they be used in preparation for, and in carrying out, a violation of 18 USC §956 (conspiracy to kill or maim persons outside the United States.)	G	108 Months	Spoke to undercover about desire to fight overseas in Syria or Yemen with groups including al-Qaeda in the Arabian Peninsula (AQAP), the Islamic State of Iraq and Sham (ISIS), and jabhat al-Nusrah (JAN). Discussed weapons in Jordan's possession including AK-47, and how he would not hesitate to use them. <i>See</i> ECF No. 1.
Narseal Batiste	1:06-cr-20373 (S.D. Fla.)	18 USC §2339A.F Providing Material Support for Terrorists, 18 USC §844H.F Explosives Used in Commission of Felony, 18 USC §2384.F Seditious Conspiracy	NG-jury trial	162 Months	Leader of conspiracy to provide support to Al Qaeda. Coordinated efforts in kidnaping the informants to ascertain whether they were working for the government; pledged oath of loyalty to Al Qaeda; Abraham and Batiste drove informant around Miami suggesting targets for Al Qaeda to blow up; Rotschild, Phanor, and Batiste took photographs and videos of Federal Buildings which they believed Al Qaeda wanted to target for destruction; and Burson was present and standing guard as a look-out for Batiste during several of his meetings with the informant in which the photographs and videos were provided and discussed. <i>See</i> ECF No. 1451.
Patrick Abraham	1:06-cr-20373 (S.D. Fla.)	18 USC §2339A.F Providing Material Support to Terrorists, 18 USC §844H.F Explosives Used in Commission of Felony	NG-jury trial (41 days)	172 Months and 15 Days	Conspired with Batiste as leader to provide support to Al Qaeda. Coordinated efforts in kidnaping the informants to ascertain whether they were working for the government; pledged oath of loyalty to Al Qaeda; Abraham and Batiste drove informant around Miami suggesting targets for Al Qaeda to blow up; Rotschild, Phanor, and Batiste took photographs and videos of Federal Buildings which they believed Al Qaeda wanted to target for destruction; and Burson was present and standing guard as a look-out for Batiste during several of his meetings with the informant in which the photographs and videos were provided and discussed. <i>See</i> ECF No. 1451.



Stanley Grant Phanor	1:06-cr-20373 (S.D. Fla.)	18 USC §2339A.F Providing Material Support for Terrorists	NG- jury trial (41 days)	96 Months	Conspired with Batiste as leader to provide support to Al Qaeda. Coordinated efforts in kidnaping the informants to ascertain whether they were working for the government; pledged oath of loyalty to Al Qaeda; Abraham and Batiste drove informant around Miami suggesting targets for Al Qaeda to blow up; Rotschild, Phanor, and Batiste took photographs and videos of Federal Buildings which they believed Al Qaeda wanted to target for destruction; and Burson was present and standing guard as a look-out for Batiste during several of his meetings with the informant in which the photographs and videos were provided and discussed. <i>See</i> ECF No. 1451.
Burson Augustin	1:06-cr-20373 (S.D. Fla.)	18 USC §2339A.F Providing Material Support for Terrorists	NG- jury trial (41 days)	72 Months	Conspired with Batiste as leader to provide support to Al Qaeda. Coordinated efforts in kidnaping the informants to ascertain whether they were working for the government; pledged oath of loyalty to Al Qaeda; Abraham and Batiste drove informant around Miami suggesting targets for Al Qaeda to blow up; Rotschild, Phanor, and Batiste took photographs and videos of Federal Buildings which they believed Al Qaeda wanted to target for destruction; and Burson was present and standing guard as a look-out for Batiste during several of his meetings with the informant in which the photographs and videos were provided and discussed. <i>See</i> ECF No. 1451.
Rotschild Augustine	1:06-cr-20373 (S.D. Fla.)	18 USC §2339A.F Providing Material Support for Terrorists	NG- jury trial (41 days)	84 Months	Conspired with Batiste as leader to provide support to Al Qaeda. Coordinated efforts in kidnaping the informants to ascertain whether they were working for the government; pledged oath of loyalty to Al Qaeda; Abraham and Batiste drove informant around Miami suggesting targets for Al Qaeda to blow up; Rotschild, Phanor, and Batiste took photographs and videos of Federal Buildings which they believed Al Qaeda wanted to target for destruction; and Burson was present and standing guard as a look-out for Batiste during several of his meetings with the informant in which the photographs and videos were provided and discussed. <i>See</i> ECF No. 1451.

Nima Ali Yusuf	3:10-cr-04551 (S.D. Cal.)	18 USC §2339B(a)(1) - Conspiracy to Provide Material Support to FTO	G	96 Months	Sent approx. \$1,450 to men fighting in Somalia for al Shabaab, and to lied to federal agents about it. Tried to help co-conspirator recruit a local man to go and fight for al Shabaab. When co-conspirator told Yusuf that al Shabaab had completed a successful "martyrdom operation" in which Burundian peacekeeping troops were killed, Yusuf responded, "Oh my God. God is great. Wonderful. I swear to God, you told me something to be happy about." <i>See</i> Dec.11, 2012 DOJ/FBI press release.
Pratheepan Thavaraja	1:06-cr-00616 (E.D.N.Y.)	18 USC §2339 Providing Material Support to Terrorists; 18 USC §371 Conspiracy to Defraud the United States	G	108 Months	Senior procurement agent for the Liberation Tigers of Tamil Eelam (LTTE), a designated foreign terrorist organization. Involved in the purchasing improvised explosive devices, missiles, machine guns, artillery, radar, and other equipment and technology from countries around the world, including US. A single spreadsheet of priority items to purchase, found on Thavaraja's computer, totaled \$20 million in arms and equipment. It included, among other things, six 25mm Anti Aircraft Guns, six 30 mm Twin Barrel Mounted Naval Guns, thousands of automatic rifles, millions of rounds of ammunition, grenade launchers, 50 tons of C4 explosive, five tons of Phlegmatized RDX explosive, 50 tons of TNT - based on Chinese specification and 50 tons of Tritonal explosive. <i>See</i> ECF No. 344
Murugesu Vinayagamoorthy	1:06-cr-00616 (E.D.N.Y.)	18 USC §2339 Providing Material Support or Resources to Terrorists	G (w/ attempt w/d)	Time-Served	A London physician, was a senior representative of the LTTE and undertook various projects around the world on behalf of LTTE leadership in Sri Lanka. <i>See</i> ECF No. 344
Vijayshanthar Patpanathan	1:06-cr-00616 (E.D.N.Y.)	18 USC §2339 Providing Material Support or Resources to Terrorists	G	Time-Served	The secretary of the American branch of the LTTE. Supported director an leaders in fundraising. <i>See</i> ECF No. 344
Karunakaran Kandasamy	1:06-cr-00616 (E.D.N.Y.)	18 USC §2339 Providing Material Support or Resources to Terrorists; 18 USC §1956(a)(3) Money Laundering - Interstate Commerce	G	Time-Served	Director of the American branch of the LTTE. Oversaw LTTE fundraising activities in US and arranged for prominent LTTE supporters from US to travel to LTTE-controlled areas of Sri Lanka and meet with LTTE leadership about support activities. <i>See</i> ECF No. 344

Suresh Sriskandarajah	1:06-cr-00616 (E.D.N.Y.)	18 USC §2339 Providing Material Support or Resources to Terrorists	G	24 Months	LTTE supporter who facilitated transactions for the LTTE in the purchase of military equipment. (PSR § 17). Assisted in researching and procuring aviation equipment, cell towers, submarine and warship design software, and communications equipment. Sent three students he recruited to Sri Lanka to conduct smuggling operations for the LTTE. <i>See</i> ECF No. 526.
Ramanan Mylvaganam	1:06-cr-00616 (E.D.N.Y.)	18 USC §2339 Providing Material Support or Resources to Terrorists	G	Time- Served	Conspired with Suresh Sriskandarajah to purchase approximately \$22,000 worth of submarine and warship design software from a United Kingdom company at the request of Pratheepan Thavarajah. <i>See</i> ECF No. 467
Fawzi Mustapha Assi	2:98-cr-80695 (E.D. Mich.)	18 USC §2339B(a)(1) Material Support to Designated FTO	G	120 Months	Boarded a flight to Lebanon. Stopped by authorities. Had two Boeing global positioning satellite modules, night vision goggles, and a thermal imaging camera that he was attempting to provide to Hizballah. <i>See</i> ECF No. 140.
Nuradin M. Abdi	2:04-cr-00088 (S.D. Ohio)	18 USC §2339A Conspiracy to Provide Material Support to Terrorists	G	120 Months - Rule 11(c)(1)(C) plea	Befriended Christopher Paul (below) and made plans to travel to overseas training camps to prepare himself for violent jihad. Planned to attend a training camp in Ethiopia, but traveled to Kenya and learned that the camp no longer existed. Then went to Somalia, met with a warlord associated with Islamic extremists. Abdi returned to the United States in March 2000. Later told FBI agents that in August 2002 he proposed a plot to bomb a shopping mall. <i>See</i> ECF No. 223; July 31, 2007 DOJ Press Release #07-568
Christopher Paul	2:07-cr-00087 (S. D. Ohio)	18 USC §2332(a) Use of Certain Weapons of Mass Destruction	G	240 Months	Traveled to Pakistan and Afghanistan to join the mujahedeen. At an al Qaeda training camp in Afghanistan, received initial training in the use of assault rifles, rocket-propelled grenades, and small unit tactics. Joined al Qaeda and stayed at a guesthouse, exclusively for al Qaeda members. Then selected for, and obtained, advanced training in explosives, climbing, and military history. Fought in Afghanistan alongside other mujahedeen. Returned to Ohio, and began recruiting individuals with extremist intentions to establish a jihadist group in Ohio. Conducted military-type training at Ohio state park. Traveled to Germany and provided explosives training Islamic terror cell there. <i>See</i> February 26, 2009 DOJ press release #09-171

Colleen R. LaRose, aka "Jihad Jane,"	2:10-cr-00123 (E.D. Pa.)	18 USC §2339A Conspiracy to Provide Material Support to Terrorists; 18 USC §956(a) Conspiracy to Kill in a Foreign Country; 18 USC §1001 False Statement to Government Official; 18 USC §1028(a)(2), (b)(4), (f) Attempted Identity Theft	G	120 Months	Recruited men on the Internet to wage violent jihad in South Asia and Europe, and recruited women on the Internet who had passports and the ability to travel to and around Europe in support of violent jihad. Plans included martyring herself, soliciting funds for terrorists, soliciting passports and avoiding travel restrictions. Received a direct order, and agreed, to kill a citizen and resident of Sweden, and to do so in a way that would frighten The whole Kufar [non-believer] world. Discussed that her appearance and American citizenship would help her blend in while carrying out the plan. Traveled to Europe and tracked the intended target online in an effort to complete her task. <i>See</i> ECF No. 72.
Jamie Paulin Ramirez	2:10-cr-00123 (E.D. Pa.)	18 USC §2339(a) Conspiracy to Provide Material Support to Terrorists	G	96 Months	Co-conspirator with LaRose (above)
Ali Yasin Ahmed	1:12-cr-00661 (E.D.N.Y.)	18 USC §2339(a) Conspiracy to Provide Material Support to FTO	G	132 Months	Served as members of al-Shabaab in Somalia, where they agreed with others to support al-Shabaab and its extremist agenda. Defendants Mohamed Yusuf and Ali Yasin Ahmed fought in battles in Somalia against African Union forces. Defendant Madhi Hashi was a close associate of American-born jihadist Omar Hammami, with ties to a known al-Shabaab suicide bomber. In addition, defendant Yusuf is featured in an al-Shabaab propaganda video. <i>See</i> ECF No. 339.
Madhi Hashi	1:12-cr-00661 (E.D.N.Y.)	18 USC §2339(a) Conspiracy to Provide Material Support to FTO	G	108 Months	Served as members of al-Shabaab in Somalia, where they agreed with others to support al-Shabaab and its extremist agenda. Defendants Mohamed Yusuf and Ali Yasin Ahmed fought in battles in Somalia against African Union forces. Defendant Madhi Hashi was a close associate of American-born jihadist Omar Hammami, with ties to a known al-Shabaab suicide bomber. In addition, defendant Yusuf is featured in an al-Shabaab propaganda video. <i>See</i> ECF No. 339.
Mohamed Yusuf	1:12-cr-00661 (E.D.N.Y.)	18 USC §2339(a) Conspiracy to Provide Material Support to FTO	G	132 Months	Served as members of al-Shabaab in Somalia, where they agreed with others to support al-Shabaab and its extremist agenda. Defendants Mohamed Yusuf and Ali Yasin Ahmed fought in battles in Somalia against African Union forces. Defendant Madhi Hashi was a close associate of American-born jihadist Omar Hammami, with ties to a known al-Shabaab suicide bomber. In addition, defendant Yusuf is featured in an al-Shabaab propaganda video. <i>See</i> ECF No. 339.

Adham Amin Hassoun	0:04-cr-60001 (S.D. Fla.)	18 USC §956(f) Conspiracy to Injure Property of Foreign Government; 18 USC §371(f) Conspiracy to Defraud the United States; 18 USC §2339(a)(f) Providing Material Support to Terrorists	NG-Jury Trial (56 days)	188 Months	Part of a North American support cell designed to send money, physical assets, and mujahideen recruits to overseas jihad conflicts. <i>See</i> ECF No. 1402.
Kifah Wael Jayyous	0:04-cr-60001 (S.D. Fla.)	18 USC §956(f) Conspiracy to Injure Property of Foreign Government; 18 USC §371(f) Conspiracy to Defraud the United States; 18 USC §2339(a)(f) Providing Material Support to Terrorists	NG-Jury Trial (56 days)	152 Months	Part of a North American support cell designed to send money, physical assets, and mujahideen recruits to overseas jihad conflicts. <i>See</i> ECF No. 1402.
Jose Padlilla	0:04-cr-60001 (S.D. Fla.)	18 USC §956(f) Conspiracy to Injure Property of Foreign Government; 18 USC §371(f) Conspiracy to Defraud the United States; 18 USC §2339(a)(f) Providing Material Support to Terrorists	NG-Jury Trial (56 days)	252 Months	Part of a North American support cell designed to send money, physical assets, and mujahideen recruits to overseas jihad conflicts. traveled overseas to receive violent jihad training and to fight violent jihad, which would include acts of murder, kidnapping and maiming, from October 1993 to November 2001. <i>See</i> ECF No. 1402.
Nancy Conde Rubio	1:07-cr-00248 (D.D.C.)	18 USC §2339B(1)(1); 18 USC §2; Providing Material Support or Resources to Terrorists	G	138 Months	FARC 1st Front's fourth-ranking member- one of the leaders of logistical support network. Commander and Rubio directed other members of the logistical support network to obtain materials and supplies. Used profits from the sale of cocaine to procure communications equipment purchased in the United States to support FARC in executing violent terrorist acts. <i>See</i> ECF No. 39-40.
Ana Isabel Pena Arevalo	1:07-cr-00248 (D.D.C.)	18 USC §2339B(a)(1); Providing Material Support or Resources to Terrorists; Conspiracy to Provide Material Support or Resources to a Designated FTO	G	31 Months	Co-conspirator with Rubio (above). Owned and operated a call center on behalf of the FARC. Call center was used to deliver and receive messages, and as a drop-off and pick-up cite for money. <i>See</i> ECF No. 43.
Luz Mery Gutierrez Vergara	1:07-cr-00248 (D.D.C.)	18 USC §2339B(a)(1); Providing Material Support or Resources to Terrorists; Conspiracy to Provide Material Support or Resources to a Designated Foreign Terrorist Organization.	G	31 Months	Co-conspirator with Rubio (above). Owned and operated a call center on behalf of the FARC. Call center was used to deliver and receive messages, and as a drop-off and pick-up cite for money. <i>See</i> ECF No. 46.
Mohamud Abdi Yusuf	4:10-cr-00547 (E.D.Mo.)	18 USC §2339B(a)(1); Providing Material Support or Resources to Terrorists; Conspiracy to Provide Material Support or Resources to a Designated Foreign Terrorist Organization.	G	140 Months	Solicited money and coordinated the transfer of the money to al-Shabaab. <i>See</i> ECF No. 118.

Imran Mandhai	0:02-cr-60096 (S.D. Fla.)	18 USC §844(n) Conspiracy to Destroy Property Affecting Interstate Commerce	G	168 Months	Conspired to blow up at least two Florida buildings in the name of jihad. <i>See</i> ECF No. 82, 128.
Shueyb Mossa Jokhan	0:02-cr-60096 (S.D. Fla.)	18 USC §844(n) Conspiracy to Destroy Property Affecting Interstate Commerce	G	58 Months	Conspired with Mandhai (above) to blow up at least two Florida buildings in the name of jihad. <i>See</i> ECF No. 82, 128.
Jamal Yousef	1:08-cr-01213 (S.D.N.Y.)	18 USC §2339B.F Conspiracy to Provide Material Support to FTO	G	144 Months	From July 2008 through July 2009, in exchange for more than a ton of cocaine, Yousef and others agreed to provide individuals whom he believed to be representatives of the FARC, but were actually confidential informants working with the DEA, with AR-15 and M-16 assault rifles, M-60 machine guns, C-4 explosives, rocket-propelled grenades, and other military items they claimed had been stolen from U.S. forces in Iraq. <i>See</i> ECF No. 87.
Ali Saleh Kahlah al-Marri	1:09-cr-10030 (C.D. Ill)	18 USC §2339B(a)(1): Providing Material Support to FTO	G	100 Months	From 1998-2001, attended terrorist training camps, learned al-Qaeda tradecraft and was dispatched by the highest levels of al-Qaeda to carry out its terrorist objectives in America. Instructed by Khalid Sheikh Mohammed to enter the United States no later than Sept. 10, 2001, with an understanding that he was to remain in the United States for an undetermined length of time. After arriving back in the US, Al-Marri researched the use of chemical weapons, potential targets and maximum casualties. <i>See</i> ECF No. 36.
Gufran Ahmed Kauser Mohammed	1:13-cr-20364 (S.D. Fla.)	18 USC §2339 Conspiring to Provide Material Support to FTO	G	180 Months	Sent a series of wire transfers to coconspirator Mohamed Hussein Said for the purpose of supporting al-Shabaab, and to an individual whom he believed was a terrorist fundraiser, recruiter, and supplier for the purpose of supporting al-Qa'ida and AQI/al-Nusrah Front. Agreed to support al-Qa'ida and AQI/al-Nusrah Front by recruiting individuals to fight in the conflict in Syria. Earmarked certain financial contributions for the purpose of buying weapons and funding attacks on United States citizens or the United Nations. <i>See</i> ECF No. 76.
Mohamed Hussein Said	1:13-cr-20364 (S.D. Fla.)	18 USC §2339 Conspiring to Provide Material Support to FTO	G	180 Months	Co-conspirator w/ Mohammed (above). Served as recruiter and fundraiser for Al-Shabab in Kenya. <i>See</i> ECF No. 233.

Shukri Abu Baker	3:04-cr-00240 (N.D. Tex)	18 USC §2339 Conspiracy to Provide Material Support or Services to Designated FTO or Terrorist (10 counts material support to organization, 11 counts funds, goods, or services to terrorist); 18 USC §1956 Conspiracy to Commit and the Commission of Money Laundering (10 counts); 18 USC §371 Conspiracy to Impede and Impair the Internal Revenue Service (IRS); 26 USC §7206 Filing False Tax Return	NG-Jury Trial (50 days)	780 Months	One of the leaders of Holy Land Foundation for Relief and Development (HLF) based out of Texas who raised and provided money to Hamas. provided approximately \$12.4 million in support to Hamas and its goal of creating an Islamic Palestinian state by eliminating the State of Israel through violent jihad. <i>See</i> ECF No. 1513.
Mohammad El-Mezain	3:04-cr-00240 (N.D. Tex)	18 USC §2339 Conspiring to Provide Material Support to FTO	NG-Jury Trial (50 days)	180 Months	One of the leaders of Holy Land Foundation for Relief and Development (HLF) who raised and provided money to Hamas. provided approximately \$12.4 million in support to Hamas and its goal of creating an Islamic Palestinian state by eliminating the State of Israel through violent jihad. <i>See</i> ECF No. 1513.
Ghassan Elashi	3:04-cr-00240 (N.D. Tex)	18 USC §2339 Conspiracy to Provide Material Support or Services to Designated FTO or Terrorist (10 counts material support to organization, 11 counts funds, goods, or services to terrorist); 18 USC §1956 Conspiracy to Commit and the Commission of Money Laundering (10 counts); 18 USC §371 Conspiracy to Impede and Impair the Internal Revenue Service (IRS); 26 USC §7206 Filing False Tax Return	NG-Jury Trial (50 days)	780 Months	One of the leaders of Holy Land Foundation for Relief and Development (HLF) based out of Texas who raised and provided money to Hamas. provided approximately \$12.4 million in support to Hamas and its goal of creating an Islamic Palestinian state by eliminating the State of Israel through violent jihad. <i>See</i> ECF No. 1513.
Mufid Abdulqader	3:04-cr-00240 (N.D. Tex)	18 USC §2339 Conspiracy to Provide Material Support or Services to Designated FTO and Specially Designated Terrorist; 18 USC §1956 Conspiracy to Commit Money Laundering	NG-Jury Trial (50 days)	240 Months	One of the leaders of Holy Land Foundation for Relief and Development (HLF) based out of Texas who raised and provided money to Hamas. provided approximately \$12.4 million in support to Hamas and its goal of creating an Islamic Palestinian state by eliminating the State of Israel through violent jihad. <i>See</i> ECF No. 1513.

Abdulrahman Odeh	3:04-cr-00240 (N.D. Tex)	18 USC §2339 Conspiracy to Provide Material Support and Services to Designated FTO and Specially Designated Terrorist, 18 USC §1956 Conspiracy to Commit Money Laundering	NG-Jury Trial (50 days)	180 Months	One of the leaders of Holy Land Foundation for Relief and Development (HLF) based out of Texas who raised and provided money to Hamas. provided approximately \$12.4 million in support to Hamas and its goal of creating an Islamic Palestinian state by eliminating the State of Israel through violent jihad. <i>See</i> ECF No. 1513.
Mohammed Mosharref Hossain	1:04-cr-00402 (N.D. Tex)	18 USC §2339 Conspiracy to Provide Material Support and Services to Designated FTO; 18 USC §1958 Money Laundering	NG - jury trial	180 Months	Imams and mosque leaders who conspired to assist in the secret importation of a surface-to-air missile that would be used in an attack in New York City. <i>See</i> ECF No. 440.
Yassin Muhiddin Aref	1:04-cr-00402 (N.D. Tex)	18 USC §2339 Conspiracy to Provide Material Support and Services to Designated FTO; 18 USC §1958 Money Laundering	NG - jury trial	180 Months	Imams and mosque leaders who conspired to assist in the secret importation of a surface-to-air missile that would be used in an attack in New York City. <i>See</i> ECF No. 440.
Patrick Nayyar	1:09-cr-01037 (S.D.N.Y.)	18 USC §2339 Providing Material Support or Resources to Terrorists; 18 USC §371 Conspiracy to Defraud the United States	NG - jury trial	180 Months	Conspired with a co-defendant and informant and agreed to sell guns, ammunition, vehicles, bulletproof vests, and night-vision goggles to the confidential informant to support Hizbollah. <i>See</i> ECF No. 71.
Tarek Mehanna	1:09-cr-10017 (D. Mass)	18 USC §2339 Conspiring to and Providing Material Support to FTO and Providing Material Support; 18 USC §956 Conspiracy to Commit Murder in a Foreign Country; 18 USC §1001 Conspiracy to Make False Statements to the FBI, Making False Statements (2 counts)	NG-Jury Trial (37 days)	210 Months	Discussed with co-conspirators, desire to participate in violent jihad against American interests and talked about fighting jihad and their desire to die on the battlefield. Traveled to the Middle East in 2004 with two associates, seeking military-type training at a terrorist training camp that would prepare them for armed jihad against U.S. interests, including U.S. and allied forces in Iraq. Returned to United States, continued efforts to provide support by, among other things, translating and posting on the Internet al Qaeda recruitment videos and other documents. Interviewed by federal authorities and provided false information and made fraudulent and fictitious statements. Lied to the FBI concerning where co-conspirator was living and what he was doing. when in fact, co-conspirator was in Somalia receiving military-type training for jihad. Admitted in recorded conversations, that he had lied to the FBI about Maldonado's whereabouts and training in Somalia. <i>See</i> ECF No. 473.



Munir Abdulkader	1:16-cr-00019 (S.D. Ohio)	18 USC §1114 - Attempted Murder of Government Employees and Officials; 18 USC §924(c) Possession of a Firearm in Furtherance of Attempted Crime of Violence; 18 USC §2339B Material Support to Designated FTO	G	180 Months + 60 Months Consecutive	Originally sought to join ISIL abroad, but ISIL leadership advised him to plan attack within US instead. Acted pursuant to the specific instructions of ISIL operative plotted to murder a government employee who worked at a military base (soldier who served abroad), but to murder him at home by beheading him. Planned to attack a police station in the Cincinnati area, using both explosives and firearms, in order to kill as many police officers as possible. In preparation for attacks, conducted surveillance of the police station, received a targeting package about the victim, went to a shooting range, learned how to operate certain firearms, and practiced shooting the firearms. Bought an AK-47 assault rifle for the attack. Expressed support for beheadings. See ECF No. 51.
Wesam al-Delaema	1:05-cr-00337 (D.D.C.)	18 USC §2332(b)(2) Conspiracy to Murder United States Nationals Outside the United States	G	300 Months	Agreed with co-conspirators to murder U.S. nationals in Iraq. Travelled to Fallujah declared intentions to kill Americans in Iraq using improvised explosive devices (IEDs). Al-Delaema and his co-conspirators discussed and demonstrated, on video, the way in which the IEDs they had buried in a road near Fallujah would be detonated and would destroy American vehicles driving on the road and kill the American occupants of those vehicles. Al-Delaema and a co-conspirator demonstrated the components of an IED buried in the road, and filmed the effects of roadside attacks in Iraq. After returning to the Netherlands, continued to attempt to obtain propaganda videos for those seeking to kill Americans in Iraq, frequently attempting to obtain raw footage of attacks on Americans in Iraq. Possessed video images of himself and his co-conspirators documenting their intentions to kill Americans in Iraq and their acts in furtherance of their conspiracy. See ECF No. 93.
Abdullahi Mohamud Yusuf	0:15-cr-00046 (D. Minn)	18 USC §2339 Conspiracy to Provide Material Support to FTO	G	Time-Served	Arrested at airport on his way to Turkey attempting to become an ISIL fighter. Lied to agents, and made accusation of profiling based on race and religion. Had Yusuf been truthful and forthcoming in response to questioning, Abdi Nur (co-conspirator) would probably have been denied boarding the next day. Instead, Abdi Nur, who was not at the time known to law enforcement, left, reached Syria, and is now presumed dead. See ECF No. 98.

Virgil Flaviu Georgescu	1:14-cr-00799 (S.D.N.Y)	18 USC §1117.F Conspiracy to Murder Officers and Employees of the United States; 18 USC §2339B.F Conspiracy to Provide Material Support or Resources to Terrorists	NG - jury trial	120 Months	Agreed to Provide Military-Grade Weapons to be Used to Shoot Down American Aircraft in Colombia. <i>See</i> ECF No. 132.
Cristian Vintila	1:14-cr-00799 (S.D.N.Y)	18 USC §1117.F Conspiracy to Murder Officers and Employees of the United States; 18 USC §2339B.F Conspiracy to Provide Material Support or Resources to Terrorists	G	48 Months	Co-conspirator with Georgescu (above)
Massimo Romagnoli	1:14-cr-00799 (S.D.N.Y)	18 USC §1117.F Conspiracy to Murder Officers and Employees of the United States; 18 USC §2339B.F Conspiracy to Provide Material Support or Resources to Terrorists	G	48 Months	Co-conspirator with Georgescu (above)
Mohammad Zaki Amawi	3:06-cr-00719 (N.D. Ohio)	18USC §956(a)(1) Conspiracy to kill, kidnap, main, or injury persons outside of the United States.; 18 USC §2339A Conspiracy to Provide Material Support or Resources to Terrorists; 18USC§842(p)(2)(A) Distributing information regarding explosives.	NG - jury trial	240 Months	Conspired to kill or maim persons outside the US, including US armed forces personnel in Iraq. Conducted firearms training and accessed and copied instructions in the construction and use of explosives – including IEDs and suicide bomb vests. Conspired to recruit others to participate in jihad training; researched and solicited funding sources for such training; and proposed sites for training in firearms, explosives and hand-to-hand combat to prospective recruits. Distributed a step-by-step guide for manufacturing chemical explosive compounds, and a video entitled, "Martyrdom Operation Vest Preparation," which described the step-by-step construction and use of a suicide bomb vest. Distributed these materials with the intent that they be used for training others to commit a crime of violence, including the killing of U.S. nationals overseas. <i>See</i> ECF No. 986; Oct. 22, 2009

Marwan Othman El-Hindi	3:06-cr-00719 (N.D. Ohio)	18USC §956(a)(1) Conspiracy to kill, kidnap, main, or injury persons outside of the United States.; 18 USC §2339B.F Conspiracy to Provide Material Support or Resources to Terrorists; 18USC§842(p)(2)(A) Distributing information regarding explosives.	NG - jury trial	144 Months	Conspired to kill or maim persons outside the US, including US armed forces personnel in Iraq. Conducted firearms training and accessed and copied instructions in the construction and use of explosives – including IEDs and suicide bomb vests. Conspired to recruit others to participate in jihad training; researched and solicited funding sources for such training; and proposed sites for training in firearms, explosives and hand-to-hand combat to prospective recruits. Distributed a slide show demonstrating the preparation and use of IEDs against apparent U.S. military vehicles and personnel, as well as the video entitled "Martyrdom Operation Vest Preparation." <i>See</i> ECF No. 986; Oct. 22, 2009 DOJ Press Release #09-1136.
Wassim I. Mazloum	3:06-cr-00719 (N.D. Ohio)	18USC §956(a)(1) Conspiracy to kill, kidnap, main, or injury persons outside of the United States.; 18 USC §2339A Conspiracy to Provide Material Support or Resources to Terrorists	NG - jury trial	100 Months	Conspired to kill or maim persons outside the US, including US armed forces personnel in Iraq. Conducted firearms training and accessed and copied instructions in the construction and use of explosives – including IEDs and suicide bomb vests. Conspired to recruit others to participate in jihad training; researched and solicited funding sources for such training; and proposed sites for training in firearms, explosives and hand-to-hand combat to prospective recruits. <i>See</i> ECF No. 986; Oct. 22, 2009 DOJ Press Release #09-1136.
Babar Ahmad	3:04-cr-00301-JCH	18 USC §2339A Provide Material Support or Resources to Terrorists	G	150 Months	Provided material support unprecedented in scope to terrorists for over seven years. Conspired with others to provide material support for terrorism through Azzam.com by soliciting and conspiring to provide funds and military equipment, and by facilitating the travel of individuals to attend training camps in Afghanistan. Efforts were intended to support the Taliban regime in Afghanistan, and were done knowing that such support would be used in preparation for or in carrying out a conspiracy to commit murder, kidnaping, or maiming, and a conspiracy to kill nationals of the U.S. while such nationals were outside the U.S. <i>See</i> ECF No. 108; July 16, 2014 D. Conn. DOJ Press release.
Syed Talha Ahsan	3:06-cr-00194-JCH	18 USC §2339A Provide Material Support or Resources to Terrorists	G	Time-Served	Assisted Ahmad (above). <i>See</i> ECF No. 108

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Criminal No. 1:16CR143</b>
	)	
<b>MOHAMAD JAMAL KHWEIS,</b>	)	<b>UNDER SEAL</b>
	)	
<b>Defendant.</b>	)	

**DEFENDANT’S POSITION ON SENTENCING – EXHIBIT E**

**Letters on Behalf of Mr. Khweis**

**[FILED UNDER SEAL]**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Criminal No. 1:16CR143</b>
	)	
<b>MOHAMAD JAMAL KHWEIS,</b>	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT’S POSITION ON SENTENCING – EXHIBIT F**

Letters and Certificates from Alexandria Detention Center



*City of Alexandria, Virginia*  
*Sheriff's Office*



Administrative Office  
Detention Center  
2003 Mill Road  
Alexandria, VA 22314  
703.746.4114

*Dana Lawhorne*  
*Sheriff*

Courthouse  
Judicial - Legal Process  
520 King Street, Suite 308  
Alexandria, VA 22314  
703.746.4120

September 19, 2017

To Whom It May Concern:

Re: Jail Adjustment Letter – Inmate Mohamad Jamal Khweis ID #A0170896

Inmate Khweis has been incarcerated at the Alexandria Detention Center since June 9, 2016.

During this period of incarceration Inmate Khweis has participated in the following programs: Bible Classes, Alpha Group Study, Discipleship Classes, Church Morning/Evening Services, Catholic Mass, Narcotics Anonymous, Health Education, Motivational Program, Path for Peace, Mindfulness Program, Life Learning Program, NOVA Open Road college courses, Re-Entry Life Skills Coaching, Motivational Program, Resource & Community Services Workshop and Art Class/Contest.

Inmate Khweis has incurred no major or minor infractions during this period of incarceration.

If you should have any other questions or concerns regarding Inmate Khweis adjustment status, I may be reached at [REDACTED].

Sincerely,

A handwritten signature in black ink that reads "Henry Young".

Henry Young  
Inmate Classification Counselor

Word Ministry of La Plata, Inc.  
"Serving the Body of Christ"

September 6, 2017

Honorable Judge Liam O'Grady  
Albert V. Bryan U. S. Courthouse  
401 Courthouse Square  
Alexandria, VA 22314

Dear Judge O'Grady:

My name is Dennis A. Dew, Pastor, Word Ministry of La Plata, Inc., located in La Plata, Maryland.

I have had the privilege and pleasure, as a volunteer clergy, at the Alexandria Detention Center to have Mr. Mohammed Khweis participate in the Bible Study sessions that I've conducted at the Detention Center.

Mr. Khweis faithfully attended the Life Learning sessions prescribed by the Detention Center, in an effort to prepare him to reenter society as a positive influence in his community. Having had the opportunity to attend the Bible Studies and experience the Word of God, during his incarceration, Mr. Khweis understands and believes that through practical application of the scriptures found in the Bible, he can live a life that will indeed bring honor to God, himself, his family, and the community, and he is committed to doing so. I believe Mr. Khweis can and will be a positive influence in the community. I truly believe that having experienced being incarcerated and having the opportunity to slow down and reevaluate his lifestyle, Mr. Khweis has learned from biblical principles that he can live a life that will bring honor to himself, family, and community.

Respectfully submitted,



Pastor, Dennis A. Dew  
"Serving the Body of Christ"



William G. Truesdale Adult Detention Center  
2001 Mill Road  
Alexandria, VA 22314

September 12, 2017

RE: Mohamed Khweis

To Whom It May Concern:

Mohamed Khweis is participating in the Open Roads college program at the William G. Truesdale Adult Detention Center in Alexandria, VA. This program offers college courses facilitated by Northern Virginia Community College (NVCC).

Mr. Khweis completed HIS 121- United States History I, a three credit history course taught in an 8-week session that meets 3 times a week for 1 hour and 50 minutes each class. This course provides an overview of the United States from its early beginnings through the Civil War. He completed the class on May 7, 2017 earning an 'A' in the class.

Mr. Khweis is currently enrolled in CST 126- Interpersonal Communication, a three credit communication course taught in an 8-week session that meets 3 times a week for 1 hour and 50 minutes each class. This course teaches interpersonal communication skills for both daily living and the world of work as it applies to perception, self-concept, self-disclosure, listening and feedback, nonverbal communication, attitudes, assertiveness, conflict resolution, and other interpersonal skills. He is set to complete the class on October 15, 2017.

Please feel free to contact me if you have further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Krista Sofonia", is written over a light blue horizontal line.

Krista M Sofonia, M.A., NCC  
NVCC Adjunct/Inmate Education Coordinator  
Phone: [REDACTED]  
Email: [REDACTED]



# CERTIFICATE *of* PARTICIPATION

*This certifies that*

**MOHAMAD KHWEIS**

*Has successfully completed 4 of the four sessions*

**OPEN DISCUSSION CLASS**

*August 7 to August 28, 2017*

*Alexandria, Virginia*

August 28, 2017

DATE

*Anne LHeureux / Anne Rensberger*

Anne LHeureux / Anne Rensberger

LIFE SKILLS COACH

**CERTIFICATE**

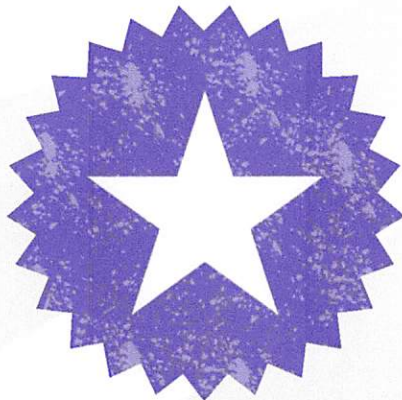
*Of*

**PARTICIPATION**

**Mohamad Jamal Khweis**

HAS SUCCESSFULLY COMPLETED THE THREE-WEEK

**INTRODUCTION TO PUBLIC SPEAKING**



PRESENTED BY:

*Anne M. Rensberger*      *Anne L'Heureux*  
Anne M. Rensberger and Anne L'Heureux

ON THIS DAY:

March 27, 2017