

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(FM) ECF Case
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This document relates to: All Actions

PLAINTIFFS' INITIAL DISCLOSURES

Plaintiffs in all actions in this MDL submit the following Initial Disclosures under Federal Rule of Civil Procedure 26(a)(1). Plaintiffs make these disclosures based on information currently available to them. Plaintiffs reserve their right, under the Federal Rules of Civil Procedure, to supplement these disclosures as further information becomes known. Furthermore, Plaintiffs specifically reserve their right to assert the attorney-client privilege, the work product doctrine, or any other applicable privilege relating to any document identified within these Initial Disclosures. By identifying documents herein, Plaintiffs do not waive the attorney-client privilege, the work product doctrine, or any other applicable privilege. Moreover, by referring to or producing documents in the Initial Disclosure process, Plaintiffs make no representations or concessions regarding the relevancy or appropriateness of any particular documents or types of documents.

I. INDIVIDUALS WITH RELEVANT DISCOVERABLE INFORMATION

Plaintiffs in these consolidated proceedings identify the following individuals as those who may have discoverable information with respect to Plaintiffs' claims. Plaintiffs do not

consent to or authorize any communication prohibited by any applicable rule of professional conduct.

1. All individuals named as defendants in Plaintiffs' operative Complaints.
Subject: Individuals have information regarding a number of subject matters relative to Plaintiffs' claims, including without limitation: (i) the origins of al Qaeda; (ii) the financial and logistical infrastructure created to support al Qaeda; (iii) al Qaeda's funding, including support from purported Islamic charitable organizations, Islamic financial institutions, and foreign states such as Saudi Arabia; (iv) al Qaeda's-related terrorist attacks or plots; (v) al Qaeda's expansion and participation in other regional jihad campaigns; and (vi) al Qaeda's association with related terrorist organizations.
2. All individuals affiliated with the entities named as defendants in Plaintiffs' operative Complaints, including without limitation, all current or former officers, directors, trustees, employees, attorneys, consultants, accountants, agents, or representatives associated with the entity defendant.
Subject: *Id.*
3. All individuals identified in all other pleadings and submissions in this MDL (i.e., RICO Statements, More Definite Statements, etc.).
Subject: *Id.*
4. All individuals affiliated with the entities named in all other pleadings and submissions in this MDL (i.e., RICO Statements, More Definite Statements, etc.), including without limitation, all current or former officers, directors, trustees, employees, attorneys, consultants, accountants, agents, or representatives associated with those entities.
Subject: *Id.*
5. All individuals identified on the U.S. Department of the Treasury Office of Foreign Assets Control's Specially Designated Nationals and Blocked Persons list, including without limitation, all individuals designated as Specially Designated Global Terrorists ("SDGT") pursuant to E.O. 13224. *See* www.treas.gov/offices/enforcement/ofac/sdn/t11sdn.pdf.
Subject: *Id.*
6. Current or former U.S. Government officials participating or involved in the E.O. 13224 designation process.
Subject: *Id.*
7. All individuals identified by the United Nations Security Council's al Qaida and Taliban Sanctions Committee, established pursuant to Resolution 1267, as having been associated with al Qaida and/or the Taliban, and which are named on the Consolidated List maintained by the Committee at www.un.org/sc/committees/1267/.
Subject: *Id.*
8. All current or former members and/or associates of the al Qaeda terrorist organization.

Subject: Id.

9. All current or former members and/or associates of the Abu Sayyaf Group terrorist organization.
Subject: Id.
10. All current or former members and/or associates of the Jemaah Islamiyah terrorist organization.
Subject: Id.
11. All current or former members and/or associates of the al Gama'a al Islamiyya terrorist organization.
Subject: Id.
12. All current or former members and/or associates of the Egyptian Islamic Jihad terrorist organization.
Subject: Id.
13. All current or former members and/or associates of the Moro Islamic Liberation Front terrorist organization.
Subject: Id.
14. All current or former members and/or associates of the Moro National Liberation Front terrorist organization.
Subject: Id.
15. All current or former members and/or associates of the Asbat al Ansar terrorist organization.
Subject: Id.
16. All current or former members and/or associates of the Hezbollah terrorist organization.
Subject: Id.
17. All current or former members and/or associates of the HAMAS terrorist organization.
Subject: Id.
18. All current or former members and/or associates of the Palestinian Islamic Jihad terrorist organization.
Subject: Id.
19. All current or former members and/or associates of the al Aqsa Martyrs Brigade terrorist organization.
Subject: Id.
20. All current or former members and/or associates of the Jaish e Mohammed terrorist organization.
Subject: Id.

21. All current or former members and/or associates of the Lashkar e Tayyiba terrorist organization.
Subject: Id.
22. All current or former members and/or associates of the Lashkar e Jhangvi terrorist organization.
Subject: Id.
23. All current or former members and/or associates of the Armed Islamic Group terrorist organization.
Subject: Id.
24. All current or former members and/or associates of the Salafist Group for Call and Combat terrorist organization.
Subject: Id.
25. All current or former members and/or associates of the Harakat al Shabaab al Mujahideen terrorist organization.
Subject: Id.
26. Members, staffers, investigators, and other individuals associated with the National Commission on Terrorist Attacks Upon the United States (the “9-11 Commission”), including without limitation, all individuals who were interviewed by the 9-11 Commission and/or who provided sworn testimony or statements to the 9-11 Commission.
Subject: Id.
27. Members, staffers, investigators, and other individuals associated with the Joint Inquiry into the Terrorist Attacks of September 11, 2001, by the House Permanent Select Committee on Intelligence and the Senate Select Committee on Intelligence, including without limitation, all individuals who were interviewed by the Congressional Joint Inquiry and/or who provided sworn testimony or statements to the Congressional Joint Inquiry.
Subject: Id.
28. All individuals who have appeared as witnesses in hearings before the U.S. House of Representatives or U.S. Senate and provided sworn testimony and/or statements regarding terrorism-related issues, including without limitation, testimony and/or statements regarding Osama bin Laden, al Qaeda and other terrorist organizations, terrorist plots and/or attacks conducted by al Qaeda or associated terrorist groups, terrorism financing, and the role of purported Islamic charitable organizations and Islamic financial institutions in the al Qaeda terrorism network.
Subject: Id.
29. All current or former counter-terrorism officials and advisors from the following U.S. Presidential Administrations: President Ronald W. Reagan; President George H. W. Bush; President William J. Clinton; President George W. Bush; and President Barack H. Obama.

Subject: Id.

30. Current or former counter-terrorism officials and advisors from U.S. Government departments and agencies, including without limitation: Department of State; Department of the Treasury; Department of Homeland Security; Department of Justice; Department of Defense; Central Intelligence Agency; Federal Bureau of Investigation; Defense Intelligence Agency; National Security Agency; and the Office of the Director of National Intelligence. Individuals include, but are not limited to: Stuart A. Levey; R. Richard Newcomb; Mark D. Roberts; Barbara C. Hammerle; Matthew A. Levitt; Ambassador James B. Foley; David D. Aufhauser; George B. Wolfe; Patrick J. Fitzgerald; Philip C. Wilcox, Jr.; R. James Woolsey, Jr.; George Tenet; Robert S. Mueller III; Louis J. Freeh; and William S. Sessions.

Subject: Id.

31. United States and foreign government officials who have conducted any investigation, inquiry, review, examination, analysis, or study regarding: (i) the origins of al Qaeda relative to the "holy war" against the Soviet occupation of Afghanistan; (ii) the influx of foreign mujahideen into Afghanistan from various parts of the Muslim world to fight the Soviet forces and defend Afghani Muslims; (iii) the vast financial and logistical infrastructure that was created to support the mujahideen opposition to the Soviet occupation of that country; (iv) the ostensible charitable organizations that operated within that infrastructure (including the Saudi-based charities such as the Muslim World League, International Islamic Relief Organization, Benevolence International Foundation, and the Saudi Red Crescent, among others); and (v) Osama bin Laden's goal, as the Soviets withdrew from Afghanistan in 1989, to spread the jihadist movement to regions outside of Afghanistan, and to wage war with the United States of America, which he believed to be the true enemy of Islam.

Subject: Id.

32. Former members of the Afghan mujahideen that were involved in, and/or associated with, the "holy war" against the Soviet occupation of Afghanistan.

Subject: Id.

33. United States and foreign government officials who have conducted any investigation, inquiry, review, examination, analysis, or study regarding al Qaeda's participation in other regional jihad campaigns following the Soviet-Afghan conflict (including without limitation: Bosnia, Chechnya, Kosovo, Sudan, Kashmir, Pakistan, Afghanistan, Iraq, Turkey, Indonesia, Malaysia, Algeria, the Philippines, Somalia, Palestine, Yemen, Kenya, Tanzania, and Egypt), which fueled al Qaeda's growth and development in the years leading up to the September 11th attacks, and enabled al Qaeda to expand its sphere of influence throughout the globe.

Subject: Id.

34. Former members of the Arab mujahideen that were involved in, and/or associated with, regional jihad campaigns occurring around the globe following the Soviet-Afghan conflict, including without limitation: Bosnia, Chechnya, Kosovo, Sudan, Kashmir,

Pakistan, Afghanistan, Iraq, Turkey, Indonesia, Malaysia, Algeria, the Philippines, Somalia, Palestine, Yemen, Kenya, Tanzania, and Egypt.

Subject: *Id.*

35. United States and foreign government officials who have conducted any investigation, inquiry, review, examination, analysis, or study regarding any al Qaeda-related terrorist attack or plot, including without limitation: (i) the 1993 World Trade Center bombing; (ii) the 1993 killing of U.S. soldiers in Somalia (“Battle of Mogadishu”); (iii) the 1996 bombing of the Khobar Towers barracks in Dhahran, Saudi Arabia; (iv) the Operation Bojinka Plot to assassinate Pope John Paul II during a planned January 1995 visit to the Philippines and to simultaneously attack multiple U.S. airliners as they flew over the Pacific Ocean from Asia to the United States; (v) the 1997 U.S. Embassy bombings in Kenya and Tanzania; (vi) the 2000 Millennium plot to bomb the Los Angeles International airport, attack various targets in Jordan, and bomb the U.S.S. Sullivan in Yemen; (vii) the 2000 attack on the U.S.S. Cole; (viii) the September 11, 2001 attacks; (ix) the 2001 attempted bombing of American Airlines Flight 63 by convicted shoe-bomber Richard Colvin Reid; (x) the 2004 Madrid train bombings; (xi) the 2005 London bombings; and (xii) the 2009 Christmas Day attempted bombing of Northwest Airlines Flight 253 by Umar Farouk Abdulmutallab.
Subject: *Id.*
36. All individuals that were involved in, and/or associated with, any al Qaeda-related terrorist attack or plot.
Subject: *Id.*
37. United States and foreign government officials who have conducted any investigation, inquiry, review, examination, analysis, or study regarding funding for terrorist organizations such as al Qaeda, including without limitation: (i) donations to Islamic charities and other benevolent organizations; (ii) zakat contributions; (iii) hawala transactions; (iv) the role of Islamic financial institutions such as National Commercial Bank, Al Rajhi Banking and Investment Corp., and Dubai Islamic Bank, among others, in knowingly providing banking and financial services to Osama bin Laden and his al Qaeda network; (v) off-shore banking; (vi) money laundering; and (vii) other terrorism-financing schemes.
Subject: *Id.*
38. Federal Bureau of Investigation 302 Cooperating Witnesses, including without limitation, Jamal Ahmad al Fadl.
Subject: *Id.*
39. Individuals detained by the United States Government following the September 11, 2001 terrorist attacks and who are currently, or were previously, incarcerated at the U.S. Naval Base at Guantanamo Bay, Cuba, including without limitation: Samir N. al Hasan; Zaid Muhamamd Sa’ad al Husayn; Abdel Hadi Mohammed Badan al Sebaii Sebaii; Omar Rajab Amin; Saed Khatem al Malki; Abdul Rahman Owaid Mohammad al Juaid; Turki Mash Awi Zayid al Asiri; Rashed Awad Khalaf Balkhair; Yunis Abdurrahman Shokuri; Said Muhammad Husayn Qahtani; Fahd Muhammed Abdullah al Fouzan; Anwar

Hamden Muhammed al Nur; Sawad al Madani; Fadil Husayn Salih Hintif; Abdul Aziz Abdul Rahman Abdul Aziz al Baddah; Abd al Aziz Muhammad Ibrahim al Nasir; Mohamed Atiq Awayd al Harbi; Wasm Awwad Umar al Wasim; Abdallah Ibrahim al Rushaydan; Rashid Abd al Muslih Qa Id al Qa Id; Sami al Haj; Said Ali al Shihri; Ghanim Abdul Rahman al Harbi; Tariq Mahmoud Ahmed al Sawah; Jamal Muhammed Alwai; Khalid Mahomoud Abdul Wahab al Asmr; Ahmed Hassan Jamil Suleyman; Ahmed Zeid Salem Zohair; Mohammed Hussein Abdallah; Mustafa Ahmed Hamlily; Salim Mahmoud Adem Mohammed Bani Amir; Abbas Habid Rumi al Naely; Abdul Latif Elbanna; Mammam Ameer; Adel Hassan Hamed; Abdul al Salam al Hilal; Bensayah Belkacem; Saber Mahfouz Lahmar; Mohammed Nechle; Mustafa Ait Idr; Lakhdar Boumediene; and Boudella al Hajj.

Subject: *Id.*

40. All individuals incarcerated by the United States and other foreign governments as a result of their association with al Qaeda or other terrorist organizations, their provision of financial, material, logistical, administrative, religious, political, ideological, or other forms of support to al Qaeda or other terrorist organizations, and/or their participation and involvement in terrorist attacks or plots.

Subject: *Id.*

41. All individuals associated with the Dar al Imam al Shaif'i terrorist training school in the Philippines, including without limitation, school administrators or officials, teachers, religious leaders, graduates, or former students.

Subject: *Id.*

42. Department of Justice representatives involved in the prosecutions of the following individuals, including without limitation: Muhammad Atef; Wadi el Hage; Fazul Abdullah Mohammed; Mohamed Sadeek Odeh; Mohamed Rashed Daoud al Owhali; Ahmed Khalfan Ghailani; Ahmed Ressam; Abdelmajid Dahoumane; Zacarias Moussaoui; Richard Reid; Perouz Sedaghaty; Ahmed Ibrahim al Muhgassil; Mohammed Salameh; Nidal Ayyad; Mahmud Abouhalima; Ahmad Ajaj; Sheikh Omar Abdel Rahman; Ey Sayyid Nosair; Ibrahim A. El Gabrowni; Siddig Ibrahim Siddig Ali; Clement Hampton El; Amir Abdelghani; Fares Khallafalla; Tarig Elhassan; Fadil Abdelghani; Mohammed Saleh; Victor Alvarez; Matarawy Mohammed Said Saleh; Mustafa Kamel Mustafa; Oussama Abdullah Kassir; Haroon Rashid Aswat; Mohammed Ali Hassan al Moayad; Mohammed Mohsen Yahya Zayed; Mohammad Salman Farooq Qureshi; Muhammad Salah; Abdel Haleem al Ashqar; Mousa Abu Marzook; Mohammed Hussein; Umar Farouk Abdulmutallab; Jamal Ahmed Mohammed Ali al Badawi; Fahd al Quso; Iyman Faris; Enaam Arnaout; Abdulrahman Alamoudi; Oussama Ziade; Buford George Peterson; Najibullah Zazi, Mohamad Wali Zazi; Ahmad Afzali; Aafia Siddiqui; Adnan Shukrijumah; Jose Padilla; Adham Hassoun, Mohamed Hesham Youssef; Kifah Jayyousi; Ahmed Omar Abu Ali; Ali Salah Khalah al Marri; Khalid Sheikh Mohammed; Ali Abd al Aziz Ali; Ramzi bin al Shibh; Abu Zubaydah; Mustafa Ahmed al Hawsawi; Abu Faraj al Libi; Abd al Rahim al Nashiri; Majod Khan; Mohammed Nazir bin Lep; Riduan bin Isomuddin (a/k/a "Hambali"); Mohd Farik bin Amin (a/k/a "Zubair"); Walid bin Attash; Gouled Hassan Dourad; Ramzi Ahmed Youssef; Abdul Hakim Murad; and Wali Khan Amin Shah.

Subject: Id.

43. Defendants and/or individuals who have testified as witnesses at terrorism-related trials, including without limitation: *U.S. v. Usama Bin Laden, et al.*, Case No. S5 98 Cr. 1023; *U.S. v. Ahmed al Mughassil, et al.*, Case No. 01-228-A; *U.S. v. Omar Ahmad Ali Abdel Rahman, et al.*, Case No. S5 93 Cr. 181; *U.S. v. Benevolence International Foundation, Inc., et al.*, Case No. 02 CR 0414; *U.S. v. Enaam M. Arnaout*, Case No. 02 CR 892; *U.S. v. Holy Land Foundation for Relief and Development, et al.*, Case No. 3:04 CR 240 P; *U.S. v. Ahmed Khalfan Ghailani*, Case No. S10 98 Crim. 1023; *U.S. v. Jose Padilla, et al.*, Case No. 04-60001-CR-Cooke; *U.S. v. Richard Colvin Reid*, Case No. 02-10013-WGY; *U.S. v. Al Haramain Islamic Foundation, Inc., et al.*, Case No. CR 05-60008; *U.S. v. Abdurahman M. Alamoudi*, Case No. 03-513-A; *U.S. v. Ahmed Omar Abu Ali*, Case No. 1:05 CR 53; *U.S. v. Jamal Ahmed Mohammed Ali al Badawi, et al.*, Case No. S12 98 Cr. 1023; *U.S. v. Ali Salah Khalah al Marri*, Case No. 09 CR 10030; *U.S. v. Mustafa Kamel Mustafa, et al.*, Case No. S2 04 Cr. 356; *U.S. v. Mohammed Ali Hassan al Moayad, et al.*, Case No. 03-1322; *U.S. v. Zacarias Moussaoui*, Case No. 01-455-A; *U.S. v. Mohammad Salman Farooq Qureshi*; Case No. 6:04 CR 60057-001; *U.S. v. Ahmed Ressam, et al.*, Case No. CR 99-0666; and *U.S. v. Ramzi Ahmed Yousef, et al.*, Case No. S12 93 CR 180.

Subject: Id.

44. Individuals identified in the defendants' Initial Disclosures.

Subject: Id.

45. Individuals identified or referenced in documents exchanged during discovery.

Subject: Id.

46. Individuals associated with the Council on American-Islamic Relations ("CAIR") and CAIR-Canada, including without limitation: Ghassin Elashi; Randall (Ismail) Royer; Bassam Khafasi; Rabih Hadid; Mohammad Nimer; Imam Siraji Wahaj; Sami al Arian; Fawaz Damra; Musa Abu Marzook; Jamil al Amim; Imam Wagdy Ghoneim; and Sheik Yusuf al Qaradawi.

Subject: Individuals have information regarding CAIR's links to Islamic terrorists.

II. DESCRIPTION OF RELEVANT DOCUMENTS BY CATEGORY AND LOCATION

Plaintiffs in these consolidated proceedings may use the following categories of documents to support their claims. All documents gathered on behalf of the Plaintiffs through their own independent investigations concerning al Qaeda and the September 11, 2001 attacks, including any such documents requested under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, *et seq.*, as amended, or those documents collected from the vast public record,

represent privileged work product. The identification of any such documents in these Initial Disclosures does not waive the attorney-client privilege, the work product doctrine, or any other applicable privilege.

1. Official designations, press releases, evidentiary memoranda, and other documentation and materials from the U.S. Department of the Treasury and the Office of Foreign Assets Control relative to the designation of individuals and entities identified on the Specially Designated Nationals and Blocked Persons list, including without limitation, all individuals and entities designated as Specially Designated Global Terrorists (“SDGT”) pursuant to E.O. 13224.
2. Official designations, press releases, evidentiary memoranda, and other documentation and materials from the United Nations Security Council’s al Qaida and Taliban Sanctions Committee relative to the individuals and entities identified as having been associated with al Qaida and/or the Taliban, and which are named on the Consolidated List maintained by the Committee at www.un.org/sc/committees/1267/.
3. U.S. Department of Defense Combatant Status Review Board unclassified summaries of evidence for Combatant Status Review Tribunals (“CSRT”), High Value Detainee (“HVD”) summaries, unclassified detainee statements and testimony, Administrative Review Board transcripts and summaries of evidence, and other documentation and materials relating to those individuals who are currently, or were previously, incarcerated at the U.S. Naval Base at Guantanamo Bay, Cuba.
4. The July 2004 Report of the National Commission on Terrorist Attacks Upon the United States (“The 9-11 Commission Report”), including without limitation, 9-11 Commission Staff Monographs and Statements, sworn witness testimony and statements before the Commission, and other 9-11 Commission documentation and materials.
5. The December 2002 Report of the Joint Inquiry into the Terrorist Attacks of September 11, 2001, by the House Permanent Select Committee on Intelligence and the Senate Select Committee on Intelligence, including without limitation, sworn witness testimony and statements before the Congressional Joint Inquiry, and other Congressional Joint Inquiry documentation and materials.
6. Sworn witness testimony, statements, exhibits, transcripts, and other documentation and materials from U.S. House of Representatives committee hearings and/or U.S. Senate committee hearings regarding the September 11, 2001 attacks, al Qaeda, and terrorism-related issues.
7. Pleadings, exhibits, witness statements, transcripts, evidentiary submissions, and other documentation and materials from the International Criminal Tribunal for the Former Yugoslavia (“ICTY”) and the Office of the Prosecutor relative to the ICTY’s extensive

investigations and prosecutions of individuals for crimes committed in the former Yugoslavia.

8. Pleadings, exhibits, witness statements, transcripts, evidentiary submissions, and other documentation and materials from trials that are directly or indirectly related to al Qaeda and terrorism, including without limitation, any similar trials, prosecutions, legal proceedings, or investigations conducted in the United States, in other foreign countries, or within international organizations or bodies such as the United Nations.
9. Documentation and materials from U.S. Government departments and agencies obtained via the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, *et seq.*, as amended.
10. United States and foreign government intelligence reports and/or summaries, terrorism reports and/or summaries, terrorism investigation reports and/or summaries, and other documentation and materials regarding: (i) the origins of al Qaeda relative to the "holy war" against the Soviet occupation of Afghanistan; (ii) the influx of foreign mujahideen into Afghanistan from various parts of the Muslim world to fight the Soviet forces and defend Afghani Muslims; (iii) the vast financial and logistical infrastructure that was created to support the mujahideen opposition to the Soviet occupation of that country; (iv) the ostensible charitable organizations that operated within that infrastructure (including the Saudi-based charities such as the Muslim World League, International Islamic Relief Organization, Benevolence International Foundation, and the Saudi Red Crescent, among others); and (v) Osama bin Laden's goal, as the Soviets withdrew from Afghanistan in 1989, to spread the jihadist movement to regions outside of Afghanistan, and to wage war with the United States of America, which he believed to be the true enemy of Islam.
11. United States and foreign government intelligence reports and/or summaries, terrorism reports and/or summaries, terrorism investigation reports and/or summaries, and other documentation and materials regarding al Qaeda's participation in other regional jihad campaigns following the Soviet-Afghan conflict, including without limitation: Bosnia, Chechnya, Kosovo, Sudan, Kashmir, Pakistan, Afghanistan, Iraq, Turkey, Indonesia, Malaysia, Algeria, the Philippines, Somalia, Palestine, Yemen, Kenya, Tanzania, and Egypt.
12. United States and foreign government intelligence reports and/or summaries, terrorism reports and/or summaries, terrorism investigation reports and/or summaries, and other documentation and materials regarding any al Qaeda-related terrorist attack or plot, including without limitation: (i) the 1993 World Trade Center bombing; (ii) the 1993 killing of U.S. soldiers in Somalia ("Battle of Mogadishu"); (iii) the 1996 bombing of the Khobar Towers barracks in Dhahran, Saudi Arabia; (iv) the Operation Bojinka Plot to assassinate Pope John Paul II during a planned January 1995 visit to the Philippines and to simultaneously attack multiple U.S. airliners as they flew over the Pacific Ocean from Asia to the United States; (v) the 1997 U.S. Embassy bombings in Kenya and Tanzania; (vi) the 2000 Millennium plot to bomb the Los Angeles International airport, attack various targets in Jordan, and bomb the U.S.S. Sullivan in Yemen; (vii) the 2000 attack on the U.S.S. Cole; (viii) the September 11, 2001 attacks; (ix) the 2001 attempted

- bombing of American Airlines Flight 63 by convicted shoe-bomber Richard Colvin Reid; (x) the 2004 Madrid train bombings; (xi) the 2005 London bombings; and (xii) the 2009 Christmas Day attempted bombing of Northwest Airlines Flight 253 by Umar Farouk Abdulmutallab.
13. United States and foreign government intelligence reports and/or summaries, terrorism reports and/or summaries, terrorism investigation reports and/or summaries, and other documentation and materials regarding funding for terrorist organizations such as al Qaeda, including without limitation: (i) donations to Islamic charities and other benevolent organizations; (ii) zakat contributions; (iii) hawala transactions; (iv) the role of Islamic financial institutions such as National Commercial Bank, Al Rajhi Banking and Investment Corp., and Dubai Islamic Bank, among others, in knowingly providing banking and financial services to Osama bin Laden and his al Qaeda network; (v) off-shore banking; (vi) money laundering; and (vii) other terrorism-financing schemes.
 14. Media reports and press clippings relative to Osama bin Laden, al Qaeda, and the September 11, 2001 attacks, including without limitation, news stories regarding: (i) the origins of al Qaeda and the “holy war” against the Soviet occupation of Afghanistan; (ii) the formation of al Qaeda following the Soviet-Afghan conflict and the founding members of the terrorist organization; (iii) al Qaeda’s participation in other regional jihad campaigns, particularly in Bosnia, Chechnya, Indonesia, Pakistan, the Philippines, and Sudan, which enabled the terrorist group to expand its sphere of influence throughout the globe; (iv) bin Laden’s anti-American and anti-Western views; (v) al Qaeda-related terrorist attacks or plots around the globe; (vi) terrorism financing; (vii) the provision of financial and material support to al Qaeda and other terrorist groups by purported Islamic charitable organizations such as the Muslim World League, International Islamic Relief Organization, al Haramain Islamic Foundation, World Assembly of Muslim Youth, Saudi Joint Relief Committee for Kosovo and Chechnya, Third World Relief Agency, Saudi Red Crescent, Saud High Commission, Rabita Trust, and the Muwafaq Foundation, among others; (viii) the role of Islamic financial institutions such as National Commercial Bank, Al Rajhi Banking and Investment Corp., and Dubai Islamic Bank, among others, in providing banking and financial services to bin Laden and his al Qaeda network; (ix) the provision of material and financial support to bin Laden and his al Qaeda network from foreign states such as Saudi Arabia and Sudan; and (x) United States and international terrorism investigations, trials, and legal proceedings.
 15. Documents relating to the terror sponsorship activities of the defendants, including without limitation: Muslim World League; International Islamic Relief Organization; World Assembly of Muslim Youth; Al Haramain Islamic Foundation; Saudi Joint Relief Committee for Kosovo and Chechnya; Third World Relief Agency; Saudi Red Crescent; Saud High Commission; Rabita Trust; Muwafaq Foundation; Benevolence International Foundation; Perouz Sedaghaty; Wa’el Hamza Jelaidan; Mohammed Jamal Khalifa; Dubai Islamic Bank; National Commercial Bank; Khalid bin Mahfouz; Abdulrahman bin Mahfouz; Yassin al Kadi; Al Rajhi Banking and Investment Corp.; Suleiman al Rajhi; Al Shamal Bank; Faisal Islamic Bank-Sudan; Tadamon Islamic Bank, and others.

16. Fatwas and other recorded statements by Osama bin Laden, Ayman al Zawahiri, and other senior members of al Qaeda specifically calling for jihad against the United States and other Western allies.
17. Fatwas and other recorded statements by Saudi religious figures, including without limitation, Sheik Abdul Aziz Bin Baz.
18. Fatwas and other recorded statements by representatives of the Dubai Islamic Bank.
19. Fatwas and other recorded statements by officials and other individuals associated with Saudi Arabian Islamic charitable organizations, including without limitation: Muslim World League; International Islamic Relief Organization; World Assembly of Muslim Youth; Al Haramain Islamic Foundation; and others.
20. Speeches, statements, and other formal remarks by officials and other individuals associated with Saudi Arabian Islamic charitable organizations, including without limitation: Muslim World League; International Islamic Relief Organization; World Assembly of Muslim Youth; Al Haramain Islamic Foundation; and others.
21. Journals, newsletters, books, and other publications issued by the Muslim World League, International Islamic Relief Organization, and other defendants.
22. Documents obtained via Letters Rogatory.
23. Federal, state, or local filings by the defendants, including without limitation: tax records; tax returns; real estate records; corporate records; Form 990s; and Form 1023s.

The aforementioned documents are in the possession of the Plaintiffs' Executive Committees.

III. COMPUTATION OF DAMAGES

Per the Court's Order, the calculation of damages has been deferred until after the completion of liability discovery. *See* Judge Frank Maas's July 15, 2010 Order (MDL Docket No. 2260).

IV. INSURANCE POLICIES

Not applicable.

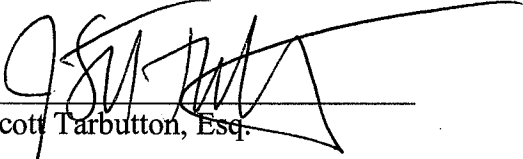
Dated: November 23, 2010

Respectfully submitted,

MDL 1570 Plaintiffs' Executive Committees
THE MDL 1570 PLAINTIFFS'
EXECUTIVE COMMITTEES

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Plaintiffs' Initial Disclosures was filed electronically this 23rd day of November 2010. Notice of this filing will be sent to all parties in 03 MDL 1570 by operation of the Southern District of New York's Electronic Case Filing ("ECF") system. Parties may access this filing through the Court's ECF system.



J. Scott Tarbutton, Esq.