

Jama'at Islami As-Sahih

1
2 James recruited defendant into JIS, and had defendant swear
3 an oath of loyalty and obedience to James and JIS. In
4 furtherance of the conspiracy, defendant recruited Patterson and
5 Samana into JIS and had them swear oaths of allegiance and
6 obedience to defendant and JIS. Defendant decided that gas
7 stations would be robbed to supply money for the group's planned
8 attacks in the Los Angeles area. Defendant and Patterson
9 participated in numerous armed robberies of gas stations in
10 fulfillment of this plan.

11 In furtherance of the conspiracy, Samana researched targets
12 for attack, and wrote them down on a document called "Modes of
13 Attack," attached as Exhibit 1. The document included the
14 following notations: "LAX and Consulate of Zion" listed under the
15 heading of "Options"; "Military Targets" with two addresses
16 listed underneath it; "Army Recruiting centers throughout the
17 county" written under the "Military Targets" notation, followed
18 by multiple addresses in Los Angeles; "Military base in Manhattan
19 Beach" and then some additional addresses; and "Campsite of
20 Zion."

21 Samana drove the getaway car for defendant on several armed
22 gas station robberies.

23 In furtherance of the conspiracy, defendant committed the
24 following acts, among others, in Los Angeles and Orange Counties:

25 a. On or about June 6, 2005, defendant, armed with a
26 shotgun, and Patterson, who drove the getaway car, robbed a gas
27 station in Torrance, California.

28 b. On the night of July 4, 2005, defendant, Patterson, and
Samana went to Kenneth Hahn Park in Los Angeles and engaged in
target practice as part of their preparation for attacks in the
Los Angeles area.

c. On or about July 5, 2005, defendant, armed with a
shotgun, and Patterson, who drove the getaway car, robbed a gas
station in Fullerton, California.

Defendant admits that the above-listed overt acts were in
furtherance of the conspiracy to retaliate against the
governments of the United States and Israel by attacking targets
in Southern California associated with the U.S. military and the
Jewish religion.

