

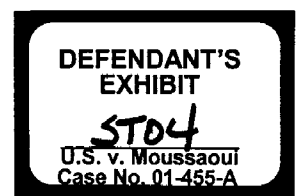
THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 01-455-A
	)	Hon. Leonie M. Brinkema
ZACARIAS MOUSSAOUI	)	

**STIPULATION REGARDING CULPABLE CONSPIRATORS FROM GERMANY**

IT IS HEREBY STIPULATED AND AGREED by and between defendant Zacarias Moussaoui and the United States that Mounir el-Motassadeq and Abdelghani Mzoudi had a role in assisting members of the "Hamburg Cell." Motassadeq and Mzoudi have been arrested and tried for terror related crimes in Hamburg, Germany.

1. Mounir el-Motassadeq is a Moroccan Muslim who lived, at all times relevant to this case, in Hamburg, Germany. Motassadeq was an acquaintance of Mohammed Atta, Marwan al-Shehhi and Ramzi Bin al-Shibh. Motassadeq also likely knew Ziad Jarrah in Hamburg.
2. Motassadeq met most of these men while studying mechanics at the Technical University in Hamburg-Harburg ("TUHH") sometime after 1996.
3. At that time, they and other young Muslim men formed a religious Islamic group at TUHH.
4. In late 1999, Atta, al-Shehhi, and Jarrah traveled to Afghanistan from Hamburg. At that time, Motassadeq stayed in Hamburg, Germany.
5. Specifically, Motassadeq, during November and December of 1999, paid all of al-Shehhi's expenses while he was in Afghanistan. Those expenses included



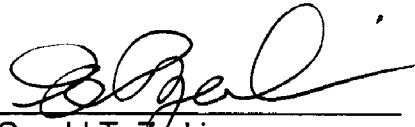
paying the rent, electricity and other costs for maintaining al-Shehhi's apartment while he was in Afghanistan. For this purpose, al-Shehhi granted a general power of attorney to Motassadeq for use in managing al-Shehhi's bank account. Motassadeq also gave notice to al-Shehhi's landlord at Wilhelmstrasse in Hamburg, Germany that al-Shehhi was planning to terminate his lease.

6. Between on or about May of 2000 and August of 2000, Motassadeq received military training in Afghanistan.
7. Like Motassadeq, Abdelghani Mzoudi was another associate of the "Hamburg Cell." Motassadeq and Mzoudi both received military training together in Afghanistan at approximately the same time.
8. For a short period of time in early 2000, Mzoudi paid rent for an al Qaeda associate in Hamburg, Germany.
9. By March of 2000, Motassadeq and Mzoudi were aware that Atta, al-Shehhi and Jarrah were members of al Qaeda who were willing to engage in a plan to violently attack Jews and Americans.
10. On August 15, 2005, Motassadeq was convicted in Germany on a charge of belonging to a terrorist organization. He was sentenced to serve seven years in prison. He was acquitted of the remaining charge that he was an accomplice in the murder of nearly 3,000 people.
11. On February 5, 2004, Mzoudi was acquitted of all charges brought against him in Germany and subsequently was deported from Germany to Morocco.
12. In the event that Motassadeq is extradited from Germany to the United States, by law, he would not face the possibility of a death sentence. That is because

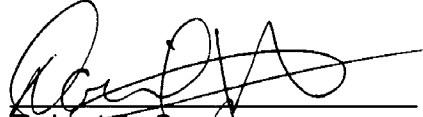
Germany, as a member of the European Union, would be required to insist, as a part of any extradition, that a person being extradited not face the possibility of a sentence of death in the country seeking extradition.

Respectfully Submitted,

Zacarias Moussaoui  
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