



1. At all times relevant to this count brought under Title 18, United States Code, Chapter 113B--Terrorism, Al-Qaeda was a designated foreign terrorist organization pursuant to 8 U.S.C. §1189.

2. At various times relevant to this count, Richard Colvin Reid received training from Al-Qaeda in Afghanistan.

3. On or about December 22, 2001, at Paris, France, and on board American Airlines Flight 63 en-route from Paris, France to Miami, Florida, but landing at East Boston, Massachusetts, in the District of Massachusetts,

RICHARD COLVIN REID,  
a/k/a ABDUL-RAHEEM,  
a/k/a ABDUL RAHEEM, ABU IBRAHIM,

defendant herein, did, without lawful authority, attempt to use a weapon of mass destruction, to wit: a destructive device, consisting of an explosive bomb placed in each of his shoes, against one and more than one national of the United States while such nationals were outside of the United States.

All in violation of Title 18, United States Code, Section 2332a(a)(1).

COUNT TWO: (18 U.S.C. §2332 - Attempted Homicide)

The Grand Jury further charges that:

1. At all times relevant to this count brought under Title 18, United States Code, Chapter 113B--Terrorism, Al-Qaeda was a designated foreign terrorist organization pursuant to 8 U.S.C. §1189.

2. At various times relevant to this count, Richard Colvin Reid received training from Al-Qaeda in Afghanistan.

3. On or about December 22, 2001, at Paris, France, and on board American Airlines Flight 63, en-route from Paris, France to Miami, Florida, but landing at East Boston, Massachusetts, in the District of Massachusetts,

RICHARD COLVIN REID,  
a/k/a ABDUL-RAHEEM,  
a/k/a ABDUL RAHEEM, ABU IBRAHIM,

defendant herein, did, outside the United States, attempt to kill and to commit a killing that is a murder of one and more than one national of the United States, while such nationals were outside the United States.

All in violation of Title 18, United States Code, Section 2332(b)(1).

COUNT THREE: (49 U.S.C. §§46505(b)(3) and (c) -- Placing Explosive Device on Aircraft)

The Grand Jury further charges that:

On or about December 22, 2001, at Paris, France, and on board American Airlines Flight 63 en-route from Paris, France to Miami, Florida, but landing at East Boston, Massachusetts, in the District of Massachusetts,

RICHARD COLVIN REID,  
a/k/a ABDUL-RAHEEM,  
a/k/a ABDUL RAHEEM, ABU IBRAHIM,

defendant herein, did knowingly have on and about his person when on American Airlines Flight 63, an aircraft in and intended for operation in air transportation, and did place on that aircraft, explosive devices contained in the footwear he was then wearing; and did so willfully and without regard for the safety of human life, and with reckless disregard for the safety of human life.

All in violation of Title 49, United States Code, Sections 46505(b)(3) and (c).

COUNT FOUR: (49 U.S.C. §§46506(1) and 18 U.S.C. §1113 --

Attempted Murder)

The Grand Jury further charges that:

On or about December 22, 2001, at Paris, France, and on board American Airlines Flight 63 en-route from Paris, France to Miami, Florida, but landing at East Boston, Massachusetts, in the District of Massachusetts,

RICHARD COLVIN REID,  
a/k/a ABDUL-RAHEEM,  
a/k/a ABDUL RAHEEM, ABU IBRAHIM,

defendant herein, did, on an aircraft in the special aircraft jurisdiction of the United States, attempt to commit murder of one and more than one of the 183 other passengers and 14 crew members on board American Airlines Flight 63.

All in violation of Title 49, United States Code, Section 46506(1) and Title 18, United States Code, Section 1113.

COUNT FIVE: (49 U.S.C. §46504 -- Interference with Flight Crew and Attendants)

The Grand Jury further charges that:

On or about December 22, 2001, at Paris, France, and on board American Airlines Flight 63 en-route from Paris, France to Miami, Florida, but landing at East Boston, Massachusetts, in the District of Massachusetts,

RICHARD COLVIN REID,  
a/k/a ABDUL-RAHEEM,  
a/k/a ABDUL RAHEEM, ABU IBRAHIM,

defendant herein, did, on an aircraft in the special aircraft jurisdiction of the United States, by assaulting and intimidating Hermis Moutardier, a flight attendant of the aircraft, interfere with the performance of the duties of said flight attendant, and did lessen the ability of said flight attendant to perform those duties; and did use a dangerous weapon in assaulting and intimidating said flight attendant.

All in violation of Title 49, United States Code, Section 46504.

COUNT SIX: (49 U.S.C. §46504 -- Interference with Flight  
Crew and Attendants)

The Grand Jury further charges that:

On or about December 22, 2001, at Paris, France, and on board American Airlines Flight 63 en-route from Paris, France to Miami, Florida, but landing at East Boston, Massachusetts, in the District of Massachusetts,

RICHARD COLVIN REID,  
a/k/a ABDUL-RAHEEM,  
a/k/a ABDUL RAHEEM, ABU IBRAHIM,

defendant herein, did, on an aircraft in the special aircraft jurisdiction of the United States, by assaulting and intimidating Cristina Jones, a flight attendant of the aircraft, interfere with the performance of the duties of said flight attendant, and did lessen the ability of said flight attendant to perform those duties; and did use a dangerous weapon in assaulting and intimidating said flight attendant.

All in violation of Title 49, United States Code, Section 46504.

COUNT SEVEN: (18 U.S.C. §§32(a)(1) and (7) -- Attempted  
Destruction of Aircraft)

The Grand Jury further charges that:

On or about December 22, 2001, at Paris, France, and on board American Airlines Flight 63 en-route from Paris, France to Miami, Florida, but landing at East Boston, Massachusetts, in the District of Massachusetts,

RICHARD COLVIN REID,  
a/k/a ABDUL-RAHEEM,  
a/k/a ABDUL RAHEEM, ABU IBRAHIM,

defendant herein, did willfully attempt to set fire to, damage, destroy, disable, and wreck American Airlines Flight 63, an aircraft in the special aircraft jurisdiction of the United States and a civil aircraft used, operated, and employed in interstate, overseas and foreign air commerce.

All in violation of Title 18, United States Code, Sections 32(a)(1) and (7).

COUNT EIGHT: (18 U.S.C. §924(c) -- Using a Destructive Device During and in Relation to a Crime of Violence)

The Grand Jury further charges that:

On or about December 22, 2001, at Paris, France, and on board American Airlines Flight 63 en-route from Paris, France to Miami, Florida, but landing at East Boston, Massachusetts, in the District of Massachusetts,

RICHARD COLVIN REID,  
a/k/a ABDUL-RAHEEM,  
a/k/a ABDUL RAHEEM, ABU IBRAHIM,

defendant herein, during and in relation to a crime of violence for which he could be prosecuted in a court of the United States, to wit: (1) attempted use of a weapon of mass destruction against a national of the United States while such national is outside of the United States, as charged in Count One of this Indictment; (2) attempted homicide of a national of the United States outside the United States, as charged in Count Two of this Indictment; (3) attempted murder on an aircraft in the special aircraft jurisdiction of the United States, as charged in Count Four of this Indictment; (4) interference with flight crew and attendants, as charged in Counts Five and Six of the Indictment; (5) attempted destruction of an aircraft in the special aircraft jurisdiction of the United States, the aircraft also being a civil aircraft used, operated, and employed in interstate, overseas, and foreign air commerce, as charged in

Count Seven of this Indictment; and (6) attempted wrecking of a mass transportation vehicle, as charged in Count Nine of the Indictment; did use and carry a firearm, to wit, two destructive devices each consisting of an explosive bomb, and did, in furtherance of such charged crimes, possess those same destructive devices.

All in violation of Title 18, United States Code, Section 924(c).

COUNT NINE: (18 U.S.C. §§1993(a)(1) and (8) -- Attempted  
Wrecking of a Mass Transportation Vehicle)

The Grand Jury further charges that:

On or about December 22, 2001, at Paris, France, and on  
board American Airlines Flight 63 en-route from Paris, France to  
Miami, Florida, but landing at East Boston, Massachusetts, in  
the District of Massachusetts,

RICHARD COLVIN REID,  
a/k/a ABDUL-RAHEEM,  
a/k/a ABDUL RAHEEM, ABU IBRAHIM,

defendant herein, did willfully attempt to wreck, set fire to,  
and disable a mass transportation vehicle, American Airlines  
Flight 63, a Boeing 767-300 International airliner operated by  
American Airlines, a mass transportation provider engaged in and  
affecting interstate and foreign commerce, at a time when  
American Airlines Flight 63 was carrying passengers.

All in violation of Title 18, United States Code, Section  
1993(a)(1) and (8).