CHARGE SHEET

I. PERSONAL DATA

1. NAME OF ACCUSED:
GHASSAN ABDULLAH AL SHARBI

2. ALIASES OF ACCUSED:
Abdullah al Muslim, Abu Muslim

3. ISN NUMBER OF ACCUSED (LAST FOUR):
0682

II. CHARGES AND SPECIFICATIONS

4. CHARGE: VIOLATION OF SECTION AND TITLE OF CRIME IN PART IV OF M.M.C.

SPECIFICATION:

SEE CONTINUATION SHEET ATTACHED.

III. SWEARING OF CHARGES

5a. NAME OF ACCUSER (*LAST, FIRST, MI*)	5b. GRADE	5c. ORGANIZATION OF ACCUSER
RIZZOTTI, MICHAEL	O-3	OMC-PROSECUTION

5d. SIGNATURE OF ACCUSER	5e. DATE (YYYYMMDD)
	20090112

AFFIDAVIT: Before me, the undersigned, authorized by law to administer oath in cases of this character, personally appeared the above named accuser the 12 day of JAN, 2009, and signed the foregoing charges and specifications under oath that he/she is a person subject to the Uniform Code of Military Justice and that he/she has personal knowledge of or has investigated the matters set forth therein and that the same are true to the best of his/her knowledge and belief.

KEITH A. PETTY
Typed Name of Officer

OMC-PROSECUTION
Organization of Officer

O-3
Grade

10 U.S.C. 1044(b)
Official Capacity to Administer Oath
(See R.M.C. 307(b) must be commissioned officer)

Signature

IV. NOTICE TO THE ACCUSED

6. On _____, 2009 the accused was notified of the charges against him/her (See R.M.C. 308).

_____
Typed Name and Grade of Person Who Caused Accused to Be Notified of Charges

OMC-PROSECUTION
Organization of the Person Who Caused Accused to Be Notified of Charges

_____
Signature

V. RECEIPT OF CHARGES BY CONVENING AUTHORITY

7. The sworn charges were received at 1705 hours, on 19 Feb. 2009, at Arlington, VA

_____.
Location

For the Convening Authority: Donna L. Wilkins
Typed Name of Officer

GS-15
Grade

Signature

VI. REFERRAL

8a. DESIGNATION OF CONVENING AUTHORITY	8b. PLACE	8c. DATE (YYYYMMDD)

Referred for trial to the (non)capital military commission convened by military commission convening order _____

_____.

_____ subject to the following instructions[1]: _____

_____

By _____ of _____
Command, Order, or Direction

_____
Typed Name and Grade of Officer

_____
Official Capacity of Officer Signing

_____
Signature

VII. SERVICE OF CHARGES

9. On _____, _____ I (caused to be) served a copy these charges on the above named accused.

_____
Typed Name of Trial Counsel

_____
Grade of Trial Counsel

_____
Signature of Trial Counsel

FOOTNOTES

[1]See R.M.C. 601 concerning instructions. If none, so state.

Charge Sheet Continuation Page in Case of GHASSAN ABDULLAH AL SHARBI

CHARGE I: Violation of 10 U.S.C. § 950v(b)(28) Conspiracy

Specification: In that Ghassan Abdullah al Sharbi ("al Sharbi"), a person subject to trial by military commission as an alien unlawful enemy combatant, did, at various locations in Afghanistan, Pakistan and elsewhere, between on or about August 2001 and on or about March 2002, conspire and agree with Usama bin Laden, Zayn al-ibidin Muhammed Husayn ("abu Zubaydah"), Sufyian Barhoumi ("Barhoumi"), and Jabran Said Bin al Qahtani ("al Qahtani"), various other members and associates of the al Qaeda organization, both known and unknown, and various others known and unknown, to commit one or more substantive offenses triable by military commission, to wit: murder of protected persons, attacking civilians, attacking civilian objects, intentionally causing serious bodily injury, murder in violation of the law of war, destruction of property in violation of the law of war, providing material support to an international terrorist organization and terrorism; and with knowledge of the unlawful purpose of the agreement knowingly commit one or more of the following overt acts in order to accomplish some objective or purpose of the agreement:

a. On or about August 2001, al Sharbi, a Saudi citizen, left Saudi Arabia and traveled to Afghanistan with the intent to receive training at a terrorist training camp.

b. On or about August 2001, al Sharbi attended the al Qaeda run al Farouq training camp. While at the training camp, al Sharbi met Usama bin Laden and several times listened to him speak. At al Farouq, al Sharbi received training that included physical fitness training, military tactics, weapons instructions, and firing of a variety of individual and crew-served weapons.

c. During on or about August and September 2001, al Sharbi stood guard duty with loaded weapons at al Farouq several times when Usama bin Laden visited the camp.

d. From on or about August 2001 to September 2001, al Sharbi provided English translation for Richard Dean Belmar's terrorist training at al Farouq, to include translating Belmar's personal bayat ("oath of allegiance") to Usama bin Laden.

e. On or about September 13, 2001, al Sharbi fled al Farouq with other camp attendees.

f. On or about December 2001, al Sharbi was directed by al Qaeda or al Qaeda associates to receive training on electronically-controlled explosives with al Qahtani in Pakistan, which al Sharbi agreed to receive.

g. Between on or about late December 2001 and the end of February 2002, al Qahtani and al Sharbi moved to a safe house in Faisalabad, Pakistan. They were told to report to abu Zubaydah because of their educational backgrounds in electronics. Once in Faisalabad, they were to receive further training in the construction and use of remote detonation devices, in order to attack United States and Coalition forces.

h. By early March 2002, Barhoumi joined al Qahtani and al Sharbi at the safe house in Faisalabad, Pakistan.

i. On or about March 2002, abu Zubaydah facilitated the importation of electronic components, which included electrical resistors, plastic resistors, light bulbs for circuit board lights, plastic and ceramic diodes, circuit testing boards, an ohmmeter, watches, soldering wire, soldering guns, wire and coil, six cell phones of a specified model, transformers and an electronics manual, and text books, note books and manuals on electronics, circuits and the English language to the safe house in Faisalabad.

j. While staying at the safe houses in Pakistan, al Sharbi provided English language lessons to other members of the safe houses, and translated documents.

CHARGE II: Violation of 10 U.S.C. § 950v (b)(25) Providing Material Support for Terrorism

Specification: In that Ghassan Abdullah al Sharbi ("al Sharbi"), a person subject to trial by military commission as an alien unlawful enemy combatant, did, at various locations in Afghanistan, Pakistan and elsewhere, between on or about August 2001 and on or about March 2002, in the context of or associated with an armed conflict, intentionally provide material support to international terrorist organizations, including but not limited to al Qaeda, an international terrorist organization engaged in hostilities against the United States, knowing that such organization has engaged in or engages in terrorism, by performing at least one of the following acts:

a. On or about August 2001, al Sharbi, a Saudi citizen, left Saudi Arabia and traveled to Afghanistan with the intent to receive training at an terrorist training camp.

b. On or about August 2001, al Sharbi attended the al Qaeda run al Farouq training camps. While at the training camp, al Sharbi met Usama bin Laden and several times listened to him speak. At al Farouq, al Sharbi received training that included physical fitness training, military tactics, weapons instructions, and firing of a variety of individual and crew-served weapons.

c. During on or about August and September 2001, al Sharbi stood guard duty with loaded weapons at al Farouq several times when Usama bin Laden visited the camp.

d. From on or about August 2001 to September 2001, al Sharbi provided English translation for Richard Dean Belmar's terrorist training at al Farouq, to include translating Belmar's personal bayat ("oath of allegiance") to Usama bin Laden.

e. On or about September 13, 2001, al Sharbi fled al Farouq with other camp attendees.

f. On or about December 2001, al Sharbi was directed by al Qaeda or al Qaeda associates to receive training on electronically-controlled explosives with al Qahtani in Pakistan, which al Sharbi agreed to receive. Al Sharbi then traveled to Pakistan.

g. Between on or about late December 2001 and the end of February 2002, al Qahtani and al Sharbi moved from Birmel, Afghanistan, to a safe house in Faisalabad, Pakistan. They were told to report to abu Zubaydah because of their educational backgrounds in electronics. Once in Faisalabad, they were to receive further training in the construction and use of remote detonation devices, in order to attack United States and Coalition forces.

h. By early March 2002, al Qahtani, Barhoumi, and al Sharbi, were staying at the safe house in Faisalabad, Pakistan. Al Sharbi began receiving training on building small, hand-held remote-detonation devices for explosives that were later to be used in Afghanistan against United States and Coalition forces

i. On or about March 2002, abu Zubaydah facilitated the importation of electronic components, which included electrical resistors, plastic resistors, light bulbs for circuit board lights, plastic and ceramic diodes, circuit testing boards, an ohmmeter, watches, soldering wire, soldering guns, wire and coil, six cell phones of a specified model, transformers and an electronics manual, and text books, note books and manuals on electronics, circuits and the English language to the safe house in Faisalabad.

j. While staying at the safe houses in Pakistan, al Sharbi provided English language lessons to other members of the safe houses, and translated documents.