

**UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA**

---

**Alice Hoglan, a/k/a Alice Hoagland** named  
in her own right and as Personal  
Representative of the Estate of Mark Kendall  
Bingham, is a surviving Parent of Mark  
Kendall Bingham

**Kelly Arthurs** is a surviving Step-Sibling of  
Mark Kendall Bingham

**Karen Bingham** is a surviving Step-Mother  
of Mark Kendall Bingham

**Heather Strickland** is a surviving Step-  
Sibling of Mark Kendall Bingham

**Michelle Clendenney** is a surviving Step-  
Sibling of Mark Kendall Bingham

**Herbert Hoglan** is a surviving Grandfather of  
Mark Kendall Bingham

**D. Linden Hoglan** is a surviving Uncle of  
Mark Kendall Bingham

**Lee N. Hoglan** is a surviving Uncle of Mark  
Kendall Bingham

**Julie Bertelsen Hoglan** is a surviving Aunt of  
Mark Kendall Bingham

**Vaughn V. Hoglan** is a surviving Uncle of  
Mark Kendall Bingham

**Kathleen Brady Knudsen Hoglan** is a  
surviving Aunt of Mark Kendall Bingham

**Candyce Sue Hoglan** is a surviving Aunt of  
Mark Kendall Bingham

**Arline Peabody** is a surviving Step-Mother of  
Michel Bane

**Brian Major** is a surviving Step-Sibling of  
Michael Bane

**Brenda Jobe** is a surviving Step-Sibling of  
Michael Bane

:  
:  
:  
:  
:  
:  
: *The addresses of Plaintiffs are not included in this*  
: *Complaint in an attempt to protect both privacy and*  
: *security, given the nature of the case. Plaintiffs will*  
: *expeditiously file a motion pursuant to Local 5.1.e. to*  
: *file the addresses of the Plaintiffs under seal.*

: CIVIL ACTION NO.

: JURY TRIAL DEMANDED

**Joseph Carpeneto** is a surviving Brother of  
Joyce Ann Carpeneto

**Dian Dembinski, named in her own right  
and as Personal Representative of the  
Estate of Sandra Wright Cartledge,** is a  
surviving Sister of Sandra Wright Cartledge

**Loretta Haines** is a surviving Sister of Sandra  
Wright Cartledge

**Stephen Bradish** is a surviving Brother of  
Sandra Wright Cartledge

**Geraldine Deborah Spaeter** is a surviving  
Sister of Sandra Wright Cartledge

**Jack Bradish a/k/a John Bradish,** is a  
surviving Brother of Sandra Wright Cartledge

**Nicholas Chirchirillo** is a surviving Child of  
Peter Chirchirillo

**Michael Chirchirillo** is a surviving Child of  
Peter Chirchirillo

**JoanAnn Coale** is a surviving Parent of  
Jeffrey Coale

**Leslie Coale Brown** is a surviving Sibling of  
Jeffrey Coale

**Jeannette Coffey** is a surviving Parent of  
Daniel M. Coffey and surviving grandparent  
of Jason Coffey

**Jeannette Coffey on behalf of the Estate of  
Daniel F. Coffey, Jr.** a surviving parent  
(deceased) of Daniel M. Coffey and  
grandparent of Jason Coffey

**Colleen McDonald** is a surviving Fiancée of  
Jason Coffey

**Keith Bradkowski** is a surviving Domestic  
Partner of Jeffrey Collman

**Kathryn Collman** is a surviving Step-Mother  
of Jeffrey Collman

**Keith Bradkowski on behalf of the estate of**

**Beverly Sutton**, a surviving Parent (deceased) of Jeffrey Collman :

**Carolyn Sutton** is a surviving Half-Sibling of Jeffrey Collman :

**Vicki Lynn Michel** is a surviving Half-Sibling of Jeffrey Collman :

**Steve Gengler** is a surviving Step-Sibling of Jeffrey Collman :

**Charles Edward Gengler** is a surviving Step-Sibling of Jeffrey Collman :

**Susan Bohan** is a surviving Step-Sibling of Jeffrey Collman :

**Jason Diehl** is a surviving Child of Michael Diehl :

**Jeannette Diehl** is a surviving Child of Michael Diehl :

**Anthony Dorf** is a surviving Nephew of Stephen Dorf :

**Emma Fernandez Regan** is a surviving Sibling of Judy Fernandez :

**Cirilo Fernandez** is a surviving Parent of Judy Fernandez :

**Richard Fernandez** is a surviving Sibling of Judy Fernandez :

**Reneé L. Gamboa** is a surviving Parent of Ronald Gamboa :

**Reneé L. Gamboa on behalf of the Estate of Ranulf Gamboa** is a surviving Parent (deceased) of Ronald Gamboa :

**Maria Joule** is a surviving Sister of Ronald Gamboa :

**Rachel G. Malubay** is a surviving Sister of Ronald Gamboa :

**Grace Parkinson-Godshalk as Power of Attorney for James Bond Godshalk**, a surviving Parent of William Godshalk :

**Jane G. Haller** is a surviving Sibling of  
William Godshalk

**Aleese M. Hartmann** is a surviving Fiancée  
of William Godshalk

**Tina Grazioso as Parent and Natural  
Guardian of Kathryn Grazioso, a minor,** a  
surviving Child of John Grazioso

**Tina Grazioso as Parent and Natural  
Guardian of Kristen Grazioso, a minor** a  
surviving Child of John Grazioso

**Tina Grazioso as Parent and Natural  
Guardian of Michael Grazioso, a minor** a  
surviving Child of John Grazioso

**CaroleeAzzarello** is a surviving Sibling of  
John Grazioso

**Sandra Grazioso** is a surviving Parent of  
John Grazioso

**Carole Grazioso** is a surviving Step-Parent of  
John Grazioso

**Karen Ventre** is a surviving Half-Sibling of  
John Grazioso

**Krysty Grazioso** is a surviving Half-Sibling  
of John Grazioso

**CaroleeAzzarello** is a surviving Sibling of  
Timmy Grazioso

**Deborah Grazioso, named in her own right  
and as Personal Representative of the  
Estate of Timmy Grazioso,** is the surviving  
Spouse of Timmy Grazioso

**Lauren Grazioso** is a surviving Child of  
Timmy Grazioso

**Briana Grazioso** is a surviving Child of  
Timmy Grazioso

**Sandra Grazioso** is a surviving Parent of  
Timmy Grazioso

**Carole Grazioso** is a surviving Step-Parent of

Timmy Grazioso	:
	:
<b>Karen Ventre</b> is a surviving Half-Sibling of	:
Timmy Grazioso	:
	:
<b>Krysty Grazioso</b> is a surviving Half-Sibling	:
of Timmy Grazioso	:
	:
<b>Douglas Halvorson</b> is a surviving Child of	:
James Halvorson	:
	:
<b>Douglas Halvorson as parent and natural</b>	:
<b>guardian of Elle Halvorson, a minor</b> a	:
surviving Grandchild of James Halvorson	:
	:
<b>Douglas Halvorson as parent and natural</b>	:
<b>guardian of James Halvorson, a minor</b> a	:
surviving Grandchild of James Halvorson	:
	:
<b>Evelyn Halvorson</b> is a surviving Parent of	:
James Halvorson	:
	:
<b>Kate Halvorson</b> is a surviving Sibling of	:
James Halvorson	:
	:
<b>Jeanne McDermott</b> is a surviving Sibling of	:
William Wilson	:
	:
<b>Laurel L. Conklin</b> is a surviving Niece of	:
Donald Havlish	:
	:
<b>Sean Bitterman</b> is a surviving Step-Child of	:
Donald Havlish	:
	:
<b>Fiona Havlish as parent and natural</b>	:
<b>guardian of Michaela Havlish, a minor,</b> a	:
surviving Child of Donald Havlish	:
	:
<b>Lea Bitterman</b> is a surviving Step-Child of	:
Donald Havlish	:
	:
<b>David Havlish</b> is a surviving Nephew of	:
Donald Havlish	:
	:
<b>Derrick Hobin</b> is a surviving Child of James	:
Jeffery Hobin	:
	:
<b>Ju-HsiuJian, named in her own right and</b>	:
<b>as the Personal Representative of the Estate</b>	:
<b>of HweidarJian,</b> is the surviving Spouse of	:
HweidarJian	:
	:

<b>William Jian</b> is a surviving Child of HweidarJian	:
	:
	:
<b>Kevin Jian</b> is a surviving Child of HweidarJian	:
	:
	:
<b>Anita Korsonsky</b> is a surviving Sibling of Jeanette LaFond-Menichino	:
	:
	:
<b>Dina LaFond</b> is a surviving Parent of Jeanette LaFond-Menichino	:
	:
	:
<b>Emily Lavelle</b> is a surviving Parent of Denis Lavelle	:
	:
	:
<b>Patricia Caloia</b> is a surviving Sibling of Denis Lavelle	:
	:
	:
<b>Barbara Dziadek</b> is a surviving Sibling of Denis Lavelle	:
	:
	:
<b>Kathleen Palacio</b> is a surviving Sibling of Denis Lavelle	:
	:
	:
<b>Paul Lavelle</b> is a surviving Sibling of Denis Lavelle	:
	:
	:
<b>Stephanie Giglio</b> is a surviving Child of Robert Levine	:
	:
	:
<b>Christopher James LoGuidice</b> is a surviving Nephew of Catherine Lisa LoGuidice	:
	:
	:
<b>Nicole Elizabeth LoGuidice</b> is a surviving Niece of Catherine Lisa LoGuidice	:
	:
	:
<b>Deanna Marie LoGuidice</b> is a surviving Niece of Catherine Lisa LoGuidice	:
	:
	:
<b>Michael A. LoGuidice, Jr.</b> is a surviving Nephew of Catherine Lisa	:
	:
	:
<b>Michael A. LoGuidice on behalf of the Estate of Carmello Joseph LoGuidice</b> is a surviving Parent of Catherine Lisa LoGuidice	:
	:
	:
<b>Erick Elberth</b> , surviving fiancée of Catherine Lisa LoGuidice,	:
	:
	:
<b>Joseph Lostrangio, Jr.</b> is a surviving Child of Joseph Lostrangio	:
	:
	:

<b>Theresann Lostrangio as legal guardian of Cathryn Lostrangio</b> a surviving Child of Joseph Lostrangio	:
	:
	:
	:
<b>Erich Maerz</b> is a surviving Sibling of Noell Maerz	:
	:
	:
<b>Ramon Melendez, Jr.</b> is a surviving Child of Mary Melendez	:
	:
	:
<b>Ricky Melendez</b> is a surviving Child of Mary Melendez	:
	:
	:
<b>Jesse Melendez</b> is a surviving Child of Mary Melendez	:
	:
	:
<b>Ramon Melendez as parent and natural guardian of Tyler Melendez,</b> a surviving Child of Mary Melendez	:
	:
	:
<b>Florence Rosario</b> is a surviving Sibling of Mary Melendez	:
	:
	:
<b>Margaret Montanez</b> is a surviving Sibling of Mary Melendez	:
	:
	:
<b>Peter C. Milano</b> is a surviving Child of Peter T. Milano	:
	:
	:
<b>Jessica Milano</b> is a surviving Child of Peter T. Milano	:
	:
	:
<b>Alfred Milano</b> is a surviving Sibling of Peter T. Milano	:
	:
	:
<b>Frank Milano</b> is a surviving Sibling of Peter T. Milano	:
	:
	:
<b>Maureen Racioppi</b> is a surviving Sibling of Peter T. Milano	:
	:
	:
<b>Thomas Milano</b> is a surviving Sibling of Peter T. Milano	:
	:
	:
<b>Rolando Ruben Moreno</b> is a surviving Sibling of Yvette Moreno	:
	:
	:
<b>Jorge Gomez</b> is a surviving Step-Grandfather of Yvette Moreno	:
	:
	:
<b>Pedro Gerardino</b> is a surviving Grandfather of Yvette Moreno	:
	:

**Karen Moreno** is a surviving Step-Mother of  
Yvette Moreno

**Leiana Moreno** is a surviving Step-Sister of  
Yvette Moreno

**Noelia Moreno** is a surviving Step-Sister of  
Yvette Moreno

**Eric Nunez** is a surviving Sibling of Brian  
Nunez

**Neal Green** is a surviving Sibling of Brian  
Nunez

**JoAnne Lovett on behalf of the Estate of  
Paul Scalogna**, a surviving Grandfather of  
Brian Nunez

**Donna Corbett Moran** is a surviving long  
time girlfriend of Brian Nunez

**Diane Ognibene** is a surviving Stepmother of  
Philip Ognibene

**James Perry** is a surviving Parent of John  
Perry

**Joel R. Perry** is a surviving Sibling of John  
Perry

**Janice Perry** is a surviving Sibling of John  
Perry

**James Montoya** is a surviving Nephew of  
John Perry

**Theresa Papasso** is a surviving Parent of  
Salvatore T. Papasso

**Salvatore Papasso** is a surviving Parent of  
Salvatore T. Papasso

**Vincent Papasso** is a surviving Sibling of  
Salvatore T. Papasso

**Vincent Papasso, Jr.** is a surviving Nephew  
of Salvatore T. Papasso

**Karen Cofresi as Parent and Natural  
Guardian of Brittney Cofresi, a minor, a**

surviving Niece of Salvatore T. Papasso	:
	:
<b>Karen Cofresi as Parent and Natural</b>	:
<b>Guardian of Brendan Cofresi, a minor, a</b>	:
surviving Nephew of Salvatore T. Papasso	:
	:
<b>Claudia Stallworth</b> is a surviving Parent of	:
Marsha Ratchford	:
	:
<b>Reginald Simpson</b> is a surviving Sibling of	:
Marsha Ratchford	:
	:
<b>Roosevelt Stallworth</b> is a surviving Sibling of	:
Marsha Ratchford	:
	:
<b>Carl Stallworth</b> is a surviving Sibling of	:
Marsha Ratchford	:
	:
<b>Cynthia Watts</b> is a surviving Sibling of	:
Marsh Ratchford	:
	:
<b>Angelia Stallworth-Blunt</b> is a surviving	:
Sibling of Marsha Ratchford	:
	:
<b>Brian Christian</b> is a surviving Half-Sibling of	:
Marsha Ratchford	:
	:
<b>Amanda Rogers</b> is a surviving Half-Sibling	:
of Marsha Ratchford	:
	:
<b>Diana Diaz on behalf of the Estate of</b>	:
<b>Carmen Romero</b> , a surviving Parent of Elvin	:
Romero	:
	:
<b>Isaac Romero</b> is a surviving Parent of Elvin	:
Romero	:
	:
<b>Diana Diaz</b> is a surviving Sibling of Elvin	:
Romero	:
	:
<b>Loren Rosenthal on behalf of the Estate of</b>	:
<b>Evan Rosenthal</b> , a surviving Child of Richard	:
Rosenthal	:
	:
<b>Seth Rosenthal</b> is a surviving Child of	:
Richard Rosenthal	:
	:
<b>Audrey Model as Power of Attorney for</b>	:
<b>Leonard Rosenthal</b> , a surviving Parent of	:
Richard Rosenthal	:
	:
<b>Audrey Model as Power of Attorney for</b>	:

<b>Florence Rosenthal</b> , a surviving Parent of Richard Rosenthal	:
	:
	:
<b>Audrey Model</b> is a surviving Sibling of Richard Rosenthal	:
	:
	:
<b>Madeleine Rosenthal</b> is a surviving Niece of Josh Rosenthal	:
	:
	:
<b>Alexandra Rosenthal</b> is a surviving Niece of Josh Rosenthal	:
	:
	:
<b>Gary Reiss</b> is a surviving Parent of Joshua Reiss	:
	:
	:
<b>Ida Reiss</b> is a surviving Grandmother of Joshua Reiss	:
	:
	:
<b>Judith Reiss on behalf of the Estate of Lenore Jackson</b> , a surviving Grandmother of Joshua Reiss	:
	:
	:
<b>Judith Reiss on behalf of the Estate of Ken Jackson</b> , a surviving Grandfather of Joshua Reiss	:
	:
	:
<b>Adam Reiss</b> is a surviving Sibling of Joshua Reiss	:
	:
	:
<b>Jordan Reiss</b> is a surviving Sibling of Joshua Reiss	:
	:
	:
<b>Jonathan Reiss</b> is a surviving Sibling of Joshua Reiss	:
	:
	:
<b>Jennifer Reiss</b> is a surviving Sibling of Joshua Reiss	:
	:
	:
<b>Alexander Rowe, named as Personal Representative of the Estate of Nicholas Rowe</b> , is a surviving Parent of Nicholas Rowe	:
	:
	:
<b>Rachael Logan</b> is a surviving Sibling of Nicholas Rowe	:
	:
	:
<b>Alexander Rowe as legal guardian of Nadine Rowe</b> , a surviving Sibling of Nicholas Rowe	:
	:
	:
<b>Paul Rowe</b> is a surviving Sibling of Nicholas Rowe	:
	:
	:

<b>Michelle Baker</b> is a surviving Fiancée of Nicholas Rowe	:
	:
	:
<b>Alexander Rowe on behalf of the Estate of Judith Rowe</b> , a surviving Parent of Nicholas Rowe	:
	:
	:
<b>Victor Santillan</b> is a surviving Sibling of Maria Theresa Santillan	:
	:
	:
<b>Raymond Santillan</b> is a surviving Sibling of Maria Theresa Santillan	:
	:
	:
<b>Kirsten Saracini</b> is a surviving Child of Victor Saracini	:
	:
	:
<b>Brielle Saracini</b> is a surviving Child of Victor Saracini	:
	:
	:
<b>Lori Brody</b> is a surviving Sibling of Scott Schertzer	:
	:
	:
<b>Ellen Schertzer</b> is a surviving Parent of Scott Schertzer	:
	:
	:
<b>Patricia Sloan</b> is a surviving Parent of Paul K. Sloan	:
	:
	:
<b>Matt Sloan</b> is a surviving Sibling of Paul K. Sloan	:
	:
	:
<b>Sarah Funk</b> is a surviving Sibling of Paul K. Sloan	:
	:
	:
<b>Gail Smith</b> is a surviving Step-Mother of George Smith	:
	:
	:
<b>Raymond Smith on behalf of the Estate of Marion Thomas</b> , a surviving Grandmother of George Smith	:
	:
	:
<b>Raymond Smith on behalf of the Estate of Deborah Sallad</b> , a surviving sibling, of George Smith	:
	:
	:
<b>Martin Smith</b> is a surviving Nephew of George Smith	:
	:
	:
<b>Raymond Smith as legal guardian of Troia Johnson</b> , a surviving Niece of George Smith	:
	:
	:

<b>Tawanda Smith</b> is a surviving Niece of George Smith	:
	:
	:
<b>Danielle Smith</b> is a surviving Niece of George Smith	:
	:
	:
<b>Diane Smith</b> is a surviving Niece of George Smith	:
	:
	:
<b>Carl Smith</b> is a surviving Sibling of George Smith	:
	:
	:
<b>Kevin Smith</b> is a surviving Sibling of George Smith	:
	:
	:
<b>Korry Smith</b> is a surviving Sibling of George Smith	:
	:
	:
<b>Tanya Warren</b> is a surviving sibling of George Smith	:
	:
	:
<b>Latricia Smith</b> is a surviving Sibling of George Smith	:
	:
	:
<b>Elaine Smith</b> is a surviving Sibling of George Smith	:
	:
	:
<b>Christine Jackson</b> is a surviving Sibling of George Smith	:
	:
	:
<b>Barbara Hargrove</b> is a surviving Sibling of George Smith	:
	:
	:
<b>Raymond Smith, Jr., named in his own right and on behalf of the Estate of George Smith</b> is a surviving Sibling of George Smith	:
	:
	:
<b>Gail Smith as parent and natural guardian of Samuel Collazo</b> , a surviving Step-brother of George Smith	:
	:
	:
<b>Gabriella Rinehart</b> is a surviving Step-Sister of George Smith	:
	:
	:
<b>Raymond Woods</b> is a surviving Cousin of George Smith	:
	:
	:
<b>Scott Woods</b> is a surviving Cousin of George Smith	:
	:
	:
<b>Lisa Smith</b> is a surviving Cousin of George Smith	:
	:

**Angela LaGrand** is a surviving Cousin of  
George Smith

**Gail Smith as Parent and Natural  
Guardian of Leonardo Collazo**, a surviving  
Step-Brother of George Smith

**Timothy P. Soulas, Jr.** is a surviving Child of  
Timothy Soulas, Sr.

**Andrew J. Soulas** is a surviving Child of  
Timothy Soulas

**Katherine Soulas as parent and natural  
guardian of Christopher Soulas, a minor**, a  
surviving Child of Timothy Soulas

**Katherine Soulas as parent and natural  
guardian of Matthew Soulas, a minor**, a  
surviving Child of Timothy Soulas

**Katherine Soulas as parent and natural  
guardian of Nicole Soulas, a minor**, a  
surviving Child of Timothy Soulas

**Katherine Soulas as parent and natural  
guardian of Daniel Soulas, a minor**, a  
surviving Child of Timothy Soulas

**Frederick Soulas** is a surviving Parent of  
Timothy Soulas

**Stephen Soulas** is a surviving Sibling of  
Timothy Soulas

**Frederick Soulas, III** is a surviving Sibling  
of Timothy Soulas

**Dan Soulas** is a surviving Sibling of Timothy  
Soulas

**Michelle Donlan** is a surviving Sibling of  
Timothy Soulas

**Brian David Huber** is a surviving Nephew of  
William Steiner

**Daniel Huber** is a surviving Nephew of  
William Steiner

**Darren Steiner** is a surviving Child of

William Steiner	:
	:
<b>Jordan Steiner</b> is a surviving Child of	:
William Steiner	:
	:
<b>Meredith Reverdito</b> is a surviving Child of	:
William Steiner	:
	:
<b>Robert Steiner on behalf of the Estate of</b>	:
<b>Wilma Steiner</b> , a surviving Parent of William	:
Steiner	:
	:
<b>Kaitlin Steiner Keller</b> is a surviving Niece of	:
William Steiner	:
	:
<b>Robert Steiner</b> is a surviving Sibling of	:
William Steiner	:
	:
<b>Denise Steiner Donohue</b> is a surviving Niece	:
of William Steiner	:
	:
<b>Denise Steiner Donohue and Eleanor</b>	:
<b>Steiner as Co-Executors on behalf of the</b>	:
<b>Estate of Dawn Steiner</b> , a surviving Niece of	:
William Steiner	:
	:
<b>Kristyn Steiner-Martin</b> is a surviving Niece	:
of William Steiner	:
	:
<b>George M. Steiner</b> , a surviving nephew of	:
William Steiner	:
<b>Addison Friedman</b> is a surviving Nephew of	:
William Steiner	:
	:
<b>Adriana Friedman</b> is a surviving Niece of	:
William Steiner	:
	:
<b>Anthony Friedman-Ceraso</b> is a surviving	:
Nephew of William Steiner	:
	:
<b>Kristen Druckenmiller</b> is a surviving Niece	:
of William Steiner	:
	:
<b>Heather Caudill</b> is a surviving Niece of	:
William Steiner	:
	:
<b>Stephanie Feher</b> is a surviving Niece of	:
William Steiner	:
	:
<b>George Steiner</b> is a surviving Sibling of	:
William Steiner	:
	:

<b>Louise Borzumato</b> is a surviving	:
Grandmother of Andrew Stergiopoulos	:
	:
<b>Kathleen Stergiopoulos</b> is a surviving	:
Sibling of Andrew Stergiopoulos	:
	:
<b>George Stergiopoulos, Jr.</b> is a surviving	:
Sibling of Andrew Stergiopoulos	:
	:
<b>Aaron Straub</b> is a surviving Child of Edward	:
W. Straub	:
	:
<b>Sandra Straub as parent and natural</b>	:
<b>guardian of Jonathan Straub</b> , a minor, a	:
surviving Child of Edward W. Straub	:
	:
<b>Sandra Straub as parent and natural</b>	:
<b>guardian of Michael Struab</b> , a minor, a	:
surviving Child of Edward W. Straub	:
	:
<b>Edward Straub</b> is a surviving Parent of	:
Edward W. Straub	:
	:
<b>Stanley Straub</b> is a surviving Brother of	:
Edward W. Straub	:
	:
<b>Matthew Straub</b> is a surviving Brother of	:
Edward W. Straub	:
	:
<b>Salvatore Tino</b> is a surviving Parent of	:
Jennifer Tino	:
	:
<b>Jeffrey Tino</b> is a surviving Sibling of Jennifer	:
Tino	:
	:
<b>Salvatore Tino, Jr.</b> is a surviving Sibling of	:
Jennifer Tino	:
	:
<b>Adam Fuller</b> is a surviving Nephew of Meta	:
Waller	:
	:
<b>Nina Fuller</b> is a surviving Niece of Meta	:
Waller	:
	:
<b>Joseph Nicklo</b> is a surviving Sibling of	:
JeanmarieWallendorf	:
	:
<b>Mellanie Chafe</b> is a surviving Sibling of	:
JeanmarieWallendorf	:
	:
<b>Christopher Barton</b> is a surviving Sibling of	:
JeanmarieWallendorf	:



**Estate of Marc Scott Zeplin**, is a surviving  
Spouse of Marc Scott Zeplin

**Deborah Zeplin as parent and natural  
guardian of Ryan Zeplin, a minor**, a  
surviving Child of Marc Scott Zeplin

**Deborah Zeplin as parent and natural  
guardian of Ethan Zeplin, a minor**, a  
surviving Child of Marc Scott Zeplin

Plaintiffs

v.

**THE ISLAMIC REPUBLIC OF IRAN**,  
c/o Permanent Mission of Iran  
to the United Nations  
622 Third Avenue  
New York, NY 10017

**AYATOLLAH ALI HOSEINI-  
KHAMENEI**, Supreme Leader  
c/o Permanent Mission of Iran  
to the United Nations  
622 Third Avenue  
New York, NY 10017

**ALI AKBAR HASHEMI RAFSANJANI**  
c/o Permanent Mission of Iran  
to the United Nations  
622 Third Avenue  
New York, NY 10017

**IRANIAN MINISTRY OF  
INFORMATION AND SECURITY**  
c/o Permanent Mission of Iran  
to the United Nations  
622 Third Avenue  
New York, NY 10017

**THE ISLAMIC REVOLUTIONARY  
GUARD CORPS**  
c/o Permanent Mission of Iran  
to the United Nations  
622 Third Avenue  
New York, NY 10017

**HEZBOLLAH**,  
an unincorporated association  
c/o Permanent Mission of Iran

to the United Nations	:
622 Third Avenue	:
New York, NY 10017	:
	:
<b>THE IRANIAN MINISTRY</b>	:
<b>OF PETROLEUM</b>	:
c/o BijanNamdar-Zanganeh	:
Hafez Crossing, Taleghani Avenue	:
Before Hafez Bridge	:
Tehran, Iran	:
	:
<b>THE NATIONAL IRANIAN</b>	:
<b>TANKER CORPORATION</b>	:
c/o Mohammed Souri, Chairman	:
#67 and 88; Atefi Street; Africa Ave.	:
Tehran, Iran	:
	:
<b>THE NATIONAL IRANIAN</b>	:
<b>OIL CORPORATION</b>	:
c/o Madhi Mir Maezzei	:
Chief Managing Director	:
Hafez Crossing, Taleghani Avenue	:
P.O. Box 1863	:
Tehran, Iran	:
	:
<b>THE NATIONAL IRANIAN</b>	:
<b>GAS COMPANY</b>	:
#410, Mafatteh Crossing,	:
Taleghani Avenue	:
P.O. Box 6394,4533	:
Tehran, Iran	:
	:
<b>IRAN AIRLINES</b>	:
c/o Eng. DavoudKeshavarzian	:
Chairman and CEO	:
Iran Air H.Q.	:
Mahrabad Airport	:
Tehran, Iran	:
	:
<b>THE NATIONAL IRANIAN</b>	:
<b>PETROCHEMICAL COMPANY</b>	:
#46 Haft Tir Square	:
KarimkhanZand Boulevard	:
P.O. Box 11365-3484	:
Tehran, Iran	:
	:
<b>IRANIAN MINISTRY OF</b>	:
<b>ECONOMIC AFFAIRS AND FINANCE</b>	:
c/o SafdarHoseini	:
Sour Esrafil Street,	:
Bab Homayoun Avenue	:
Tehran, Iran	:

**IRANIAN MINISTRY OF  
COMMERCE**

492 Valy-e Asr Avenue  
Between Taleghani Crossroad and  
Valy-e Asr Square  
Tehran, Iran

**IRANIAN MINISTRY OF DEFENSE  
AND ARMED FORCES LOGISTICS**

Ali Shamkhani Dabestan Street  
Seyyed Khandan Bridge  
Resalat Expressway  
Tehran, Iran

**THE CENTRAL BANK OF THE  
ISLAMIC REPUBLIC OF IRAN**

c/o Ebrahim Sheibany  
Governor  
Miramad Boulevard, #144  
Tehran, Iran

And

**THE ISLAMIC REPUBLIC OF IRAN  
SHIPPING LINES**

No. 37, Aseman Tower, Sayyade Shirazee  
Square, Pasdaran Ave., P.O. Box 19395-1311,  
Tehran, Iran

**BONYAD TAAVON SEPAH, a/k/a THE  
IRGC COOPERATIVE FOUNDATION,  
BONYAD-E TA'AVON-E SEPAH and/or  
SEPAH COOPERATIVE FOUNDATION**

Niayes Highway, Seoul Street  
Tehran, Iran

**ANSAR BANK, a/k/a ANSAR FINANCE  
AND CREDIT FUND, and/or ANSAR  
FINANCIAL AND CREDIT INSTITUTE,  
and f/k/a ANSAR INSTITUTE, ANSAR  
AL-MOJAHEDIN NO-INTEREST LOAN  
INSTITUTE, and/or ANSAR SAVING  
AND INTEREST FREE-LOANS FUND**

Building No. 539, North Pasdaran Street,  
Tehran, 19575-497, Iran

**MEHR BANK, a/k/a MEHR INTEREST-  
FREE BANK, and/or MEHR FINANCE  
AND CREDIT INSTITUTE**

204 Taleghani Ave.



of their claims, Plaintiffs state the following:

### **INTRODUCTION**

1. On September 11, 2001, 2,976 individuals, referred to herein as the “9/11 Decedents,” were murdered when nineteen terrorists caused four airliners to crash into the World Trade Center Towers in New York, the Pentagon Building in Arlington County, Virginia and a field near the town of Shanksville, Pennsylvania. The nineteen hijackers (hereinafter collectively referred to as the “Al Qaeda hijackers” or the “hijackers”) were members of a network known as “Al Qaeda,” a terrorist organization dedicated to the destruction of the United States and its citizens. The Al Qaeda organization was, and is, dedicated to the goal of establishing a universal Islamic state through the use of violence. Immediately prior to the 9/11 attacks, Al Qaeda maintained headquarters in Afghanistan

2. The leader of Al Qaeda was Osama Bin Laden (hereinafter referred to as “Bin Laden”), a former citizen of Saudi Arabia who, prior to his death on May 2, 2011, planned, conspired, funded, directed, controlled, and engaged in terrorist activities and pursuits involving intentional and willful mass murder of thousands of innocent men, women, and children, including the victims of the 9/11 terrorist attacks. On several occasions, Bin Laden admitted Al Qaeda’s participation in, and responsibility for, the 9/11 attacks.

3. The Al Qaeda organization trained, funded and supported the hijackers, with

the aid and assistance of various individuals, organizations and governments, including defendants named herein - The Islamic Republic of Iran (“Iran”) and its agencies and instrumentalities (referred to collectively as the “Instrumentality Defendants”).

4. For years prior to the 9/11 attacks, Bin Laden had declared and advocated “jihad” - holy war - against the United States. For example, on February 23, 1998, Bin Laden urged jihad against Americans and published in the newspaper *Al Quds al-Arabi* the following: “*the ruling to kill the Americans and their allies - civilians and military - is an individual duty for every Muslim who can do it in any country in which it is possible to do it.*” On August 20, 1998, President Clinton advised that the United States was taking military action against terrorist objectives in Afghanistan and Sudan: “*Our target was terror; our mission was clear to strike at the network of radical groups affiliated with and funded by Osama Bin Laden, perhaps the preeminent organizer and financier of international terrorism in the world today.*” On August 21, 1998, the United States Department of State found that: “*Bin Laden’s network leads, funds and inspires a wide range of Islamic extremist groups that perpetrate acts of terrorism around the world.*”

5. In conducting their terrorist activities, Bin Laden and Al Qaeda received financial, logistical and other material support from foreign states. In particular, Iran and the Instrumentality Defendants provided Bin Laden and Al Qaeda with material support that aided the 9/11 terrorist attacks. Plaintiffs now seek to hold defendants accountable for their role in facilitating those murders.

### **JURISDICTION AND VENUE**

6. Jurisdiction arises pursuant to 28 U.S.C. §§ 1330(a), 1331 and 1332(a)(2) and

18 U.S.C. §2388. Jurisdiction also arises based on defendants' violations of 28 U.S.C. §§ 1605A (the Foreign Sovereign Immunities Act), 28 U.S.C. §1350 ("Alien Tort Act"), the Torture Victim Protection Act, PL 102-256, 106 Stat. 73 (reprinted at 28 U.S.C.A. §1350 note (West 1993)), and 18 U.S.C. §2333.

7. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(d) and 1391(f)(4).

8. As herein alleged, actions for wrongful death, personal injury and related torts perpetrated by foreign states, such as defendant Iran, through their agencies and instrumentalities, and through their officials, employees and agents, fall within the exceptions to jurisdictional immunity under 28 U.S.C. §§1605A.

### **PLAINTIFFS**

9. **Alice Hoglan, named in her own right and as Personal Representative of the Estate of Mark Kendall Bingham**, is a surviving Parent of Mark Kendall Bingham, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

10. **Kelly Arthurs** is a surviving Step-Sibling of Mark Kendall Bingham, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

11. **Karen Bingham** is a surviving Step-Mother of Mark Kendall Bingham, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

12. **Heather Strickland** is a surviving Step-Sibling of Mark Kendall Bingham,

one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

13. **Michelle Clendenney** is a surviving Step-Sibling of Mark Kendall Bingham, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

14. **Herbert Hoglan** is a surviving Grandfather of Mark Kendall Bingham, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

15. **D. Linden Hoglan** is a surviving Uncle of Mark Kendall Bingham, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

16. **Lee N. Hoglan** is a surviving Uncle of Mark Kendall Bingham, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

17. **Julie Bertelsen Hoglan** is a surviving Aunt of Mark Kendall Bingham, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

18. **Vaughn V. Hoglan** is a surviving Uncle of Mark Kendall Bingham, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

19. **Kathleen Brady Knudsen Hoglan** is a surviving Aunt of Mark Kendall Bingham, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

20. **Candyce Sue Hoglan** is a surviving Aunt of Mark Kendall Bingham, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

21. **Arline Peabody** is a surviving Step-Mother of Michel Bane, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

22. **Brian Major** is a surviving Step-Sibling of Michael Bane, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

23. **Brenda Jobe** is a surviving Step-Sibling of Michael Bane, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

24. **Joseph Carpeneto** is a surviving Brother of Joyce Ann Carpeneto, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

25. **Dian Dembinski, named in her own right and as Personal Representative of the Estate of Sandra Wright Cartledge**, is a surviving Sister of Sandra Wright Cartledge, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

26. **Loretta Haines** is a surviving Sister of Sandra Wright Cartledge, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

27. **Stephen Bradish** is a surviving Brother of Sandra Wright Cartledge, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

28. **Geraldine Deborah Spaeter** is a surviving Sister of Sandra Wright

Cartledge, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

29. **Jack Bradish a/k/a/ John Bradish** is a surviving Brother of Sandra Wright Cartledge, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

30. **Nicholas Chirchirillo** is a surviving Child of Peter Chirchirillo, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

31. **Michael Chirchirillo** is a surviving Child of Peter Chirchirillo, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

32. **Joan Ann Coale** is a surviving Parent of Jeffrey Coale, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

33. **Leslie Coale Brown** is a surviving Sibling of Jeffrey Coale, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

34. **Jeannette Coffey**, a surviving parent of Daniel M. Coffey and surviving grandparent of Jason Coffey, both of whom are 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

35. **Jeannette Coffey on behalf of the Estate of Daniel F. Coffey, Jr.** is a surviving parent (deceased) of Daniel M. Coffey and surviving grandparent (deceased) of Jason Coffey, both of whom are 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

36. **Colleen McDonald** is a surviving Fiancée of Jason Coffey, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

37. **Keith Bradkowski** is a surviving Domestic Partner of Jeffrey Collman, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

38. **Kathryn Collman** is a surviving Step-Mother of Jeffrey Collman, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

39. **Keith Bradkowski on behalf of the estate of Beverly Sutton**, a surviving Parent (deceased) of Jeffrey Collman, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

40. **Carolyn Sutton** is a surviving Half-Sibling of Jeffrey Collman, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

41. **Vicki Lynn Michel** is a surviving Half-Sibling of Jeffrey Collman, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

42. **Steve Gengler** is a surviving Step-Sibling of Jeffrey Collman, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

43. **Charles Edward Gengler** is a surviving Step-Sibling of Jeffrey Collman, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

44. **Susan Bohan** is a surviving Step-Sibling of Jeffrey Collman, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

45. **Jason Diehl** is a surviving Child of Michael Diehl, one of the 9/11

Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

46. **Jeannette Diehl** is a surviving Child of Michael Diehl, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

47. **Anthony Dorf** is a surviving Nephew of Stephen Dorf, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

48. **Emma Fernandez Regan** is a surviving Sibling of Judy Fernandez, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

49. **Cirilo Fernandez** is a surviving Parent of Judy Fernandez, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

50. **Richard Fernandez** is a surviving Sibling of Judy Fernandez, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

51. **Reneé L. Gamboa** is a surviving Parent of Ronald Gamboa, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

52. **Reneé L. Gamboa on behalf of the Estate of Ranulf Gamboa** is a surviving Parent (deceased) of Ronald Gamboa, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

53. **Maria Joule** is a surviving Sister of Ronald Gamboa, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

54. **Rachel G. Malubay** is a surviving Sister of Ronald Gamboa, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

55. **Grace Parkinson-Godshalk as Power of Attorney for James Bond**

**Godshalk**, a surviving Parent of William Godshalk, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

56. **Jane G. Haller** is a surviving Sibling of William Godshalk, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

57. **Aleese M. Hartmann** is a surviving Fiancée of William Godshalk, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

58. **Tina Grazioso as Parent and Natural Guardian of Kathryn Grazioso, a minor**, a surviving Child of John Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

59. **Tina Grazioso as Parent and Natural Guardian of Kristen Grazioso, a minor**, a surviving Child of John Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

60. **Tina Grazioso as Parent and Natural Guardian of Michael Grazioso, a minor**, a surviving Child of John Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

61. **Carolee Azzarello** is a surviving Sibling of John Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

62. **Sandra Grazioso** is a surviving Parent of John Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

63. **Carole Grazioso** is a surviving Step-Parent of John Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

64. **Karen Ventre** is a surviving Half-Sibling of John Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

65. **Krysty Grazioso** is a surviving Half-Sibling of John Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

66. **Carolee Azzarello** is a surviving Sibling of Timmy Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

67. **Deborah Grazioso, named in her own right and as Personal Representative of the Estate of Timmy Grazioso,** is the surviving Spouse of Timmy Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

68. **Lauren Grazioso** is a surviving Child of Timmy Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

69. **Briana Grazioso** is a surviving Child of Timmy Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

70. **Sandra Grazioso** is a surviving Parent of Timmy Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

71. **Carole Grazioso** is a surviving Step-Parent of Timmy Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

72. **Karen Ventre** is a surviving Half-Sibling of Timmy Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

73. **Krysty Grazioso** is a surviving Half-Sibling of Timmy Grazioso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

74. **Douglas Halvorson** is a surviving Child of James Halvorson, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

75. **Douglas Halvorson as parent and natural guardian of Elle Halvorson, a minor**, a surviving Grandchild of James Halvorson, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

76. **Douglas Halvorson as parent and natural guardian of James Halvorson, a minor**, a surviving Grandchild of James Halvorson, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

77. **Evelyn Halvorson** is a surviving Parent of James Halvorson one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

78. **Kate Halvorson** is a surviving Sibling of James Halvorson, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

79. **Jeanne McDermott** is a surviving Sibling of William Wilson, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

80. **Laurel L. Conklin** is a surviving Niece of Donald Havlish, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

81. **Sean Bitterman** is a surviving Step-Child of Donald Havlish, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

82. **Fiona Havlish as parent and natural guardian of Michaela Havlish, a minor**, a surviving Child of Donald Havlish, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

83. **Lea Bitterman** is a surviving Step-Child of Donald Havlish, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

84. **David Havlish** is a surviving Nephew of Donald Havlish, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

85. **Derrick Hobin** is a surviving Child of James Jeffery Hobin, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

86. **Ju-Hsiu Jian, named in her own right and as the Personal Representative of the Estate of Hweidar Jian**, is the surviving Spouse of Hweidar Jian, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

87. **William Jian** is a surviving Child of Hweidar Jian, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

88. **Kevin Jian** is a surviving Child of Hweidar Jian, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

89. **Anita Korsonsky** is a surviving Sibling of Jeanette LaFond-Menichino, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

90. **Dina LaFond** is a surviving Parent of Jeanette LaFond-Menichino, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

91. **Emily Lavelle** is a surviving Parent of Denis Lavelle, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

92. **Patricia Caloia** is a surviving Sibling of Denis Lavelle, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

93. **Barbara Dziadek** is a surviving Sibling of Denis Lavelle, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

94. **Kathleen Palacio** is a surviving Sibling of Denis Lavelle, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

95. **Paul Lavelle** is a surviving Sibling of Denis Lavelle, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

96. **Stephanie Giglio** is a surviving Child of Robert Levine, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

97. **Christopher James LoGuidice** is a surviving Nephew of Catherine Lisa LoGuidice, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

98. **Nicole Elizabeth LoGuidice** is a surviving Niece of Catherine Lisa LoGuidice, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

99. **Deanna Marie LoGuidice** is a surviving Niece of Catherine Lisa LoGuidice, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

100. **Michael A. LoGuidice, Jr.** is a surviving Nephew of Catherine Lisa, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

101. **Michael A. LoGuidice on behalf of the Estate of Carmello Joseph LoGuidice** a surviving Parent of Catherine Lisa LoGuidice, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

102. **Erick Elberth**, surviving fiancée of Catherine Lisa LoGuidice, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

103. **Joseph Lostrangio, Jr.** is a surviving Child of Joseph Lostrangio, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

104. **Theresann Lostrangio as legal guardian of Cathryn Lostrangio** a surviving Child of Joseph Lostrangio, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

105. **Erich Maerz** is a surviving Sibling of Noell Maerz, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

.

106. **Ramon Melendez, Jr.** is a surviving Child of Mary Melendez, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

107. **Ricky Melendez** is a surviving Child of Mary Melendez, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

108. **Jesse Melendez** is a surviving Child of Mary Melendez, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

109. **Ramon Melendez as parent and natural guardian of Tyler Melendez**, a

surviving Child of Mary Melendez, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

110. **Florence Rosario** is a surviving Sibling of Mary Melendez, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

111. **Margaret Montanez** is a surviving Sibling of Mary Melendez, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

112. **Peter C. Milano** is a surviving Child of Peter T. Milano, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

113. **Jessica Milano** is a surviving Child of Peter T. Milano, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

114. **Alfred Milano** is a surviving Sibling of Peter T. Milano, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

115. **Frank Milano** is a surviving Sibling of Peter T. Milano, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

116. **Maureen Racioppi** is a surviving Sibling of Peter T. Milano, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

117. **Thomas Milano** is a surviving Sibling of Peter T. Milano, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

118. **Rolando Ruben Moreno** is a surviving Sibling of Yvette Moreno, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

119. **Jorge Gomez** is a surviving Step-Grandfather of Yvette Moreno, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

120. **Pedro Gerardino** is a surviving Grandfather of Yvette Moreno, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

121. **Karen Moreno** is a surviving Step-Mother of Yvette Moreno, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

122. **Leiana Moreno** is a surviving Step-Sister of Yvette Moreno, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

123. **Noelia Moreno** is a surviving Step-Sister of Yvette Moreno, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

124. **Eric Nunez** is a surviving Sibling of Brian Nunez, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

125. **Neal Green** is a surviving Sibling of Brian Nunez, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

126. **JoAnne Lovett on behalf of the Estate of Paul Scalogna**, a surviving Grandfather of Brian Nunez, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

127. **Donna Corbett Moran** is a surviving long time girlfriend of Brian Nunez, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

128. **Diane Ognibene** is a surviving Stepmother of Philip Ognibene, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

129. **James Perry** is a surviving Parent of John Perry, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

130. **Joel R. Perry** is a surviving Sibling of John Perry, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

131. **Janice Perry** is a surviving Sibling of John Perry, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

132. **James Montoya** is a surviving Nephew of John Perry, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

133. **Theresa Papasso** is a surviving Parent of Salvatore T. Papasso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

134. **Salvatore Papasso** is a surviving Parent of Salvatore T. Papasso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

135. **Vincent Papasso** is a surviving Sibling of Salvatore T. Papasso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

136. **Vincent Papasso, Jr.** is a surviving Nephew of Salvatore T. Papasso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

137. **Karen Cofresi as Parent and Natural Guardian of Brittney Cofresi, a minor**, a surviving Niece of Salvatore T. Papasso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

138.

139. **Karen Cofresi as Parent and Natural Guardian of Brendan Cofresi, a minor**, a surviving Nephew of Salvatore T. Papasso, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

140. **Claudia Stallworth** is a surviving Parent of Marsha Ratchford, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

141. **Reginald Simpson** is a surviving Sibling of Marsha Ratchford, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

142. **Roosevelt Stallworth** is a surviving Sibling of Marsha Ratchford, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

143. **Carl Stallworth** is a surviving Sibling of Marsha Ratchford, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

144. **Cynthia Watts** is a surviving Sibling of Marsh Ratchford, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

145. **Angelia Stallworth-Blunt** is a surviving Sibling of Marsha Ratchford, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

146. **Brian Christian** is a surviving Half-Sibling of Marsha Ratchford, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

147. **Amanda Rogers** is a surviving Half-Sibling of Marsha Ratchford, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11,

2001.

148. **Diana Diaz on behalf of the Estate of Carmen Romero**, a surviving Parent of Elvin Romero, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

149. **Isaac Romero** is a surviving Parent of Elvin Romero, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

150. **Diana Diaz** is a surviving Sibling of Elvin Romero, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

151. **Loren Rosenthal on behalf of the Estate of Evan Rosenthal**, a surviving Child of Richard Rosenthal, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

152. **Seth Rosenthal** is a surviving Child of Richard Rosenthal, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

153. **Audrey Model as Power of Attorney for Leonard Rosenthal**, a surviving Parent of Richard Rosenthal, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

154. **Audrey Model as Power of Attorney for Florence Rosenthal**, a surviving Parent of Richard Rosenthal, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

155. **Audrey Model** is a surviving Sibling of Richard Rosenthal, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

156. **Madeleine Rosenthal** is a surviving Niece of Josh Rosenthal, one of the

9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

157. **Alexandra Rosenthal** is a surviving Niece of Josh Rosenthal, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

158. **Gary Reiss** is a surviving Parent of Joshua Reiss, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

159. **Ida Reiss** is a surviving Grandmother of Joshua Reiss, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

160. **Judith Reiss on behalf of the Estate of Lenore Jackson**, a surviving Grandmother of Joshua Reiss, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

161. **Judith Reiss on behalf of the Estate of Ken Jackson**, a surviving Grandfather of Joshua Reiss, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

162. **Adam Reiss** is a surviving Sibling of Joshua Reiss, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

163. **Jordan Reiss** is a surviving Sibling of Joshua Reiss, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

164. **Jonathan Reiss** is a surviving Sibling of Joshua Reiss, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

165. **Jennifer Reiss** is a surviving Sibling of Joshua Reiss, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

166. **Alexander Rowe, named as Personal Representative of the Estate of**

**Nicholas Rowe**, is a surviving Parent of Nicholas Rowe, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

167. **Rachael Logan** is a surviving Sibling of Nicholas Rowe, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

168. **Alexander Rowe as legal guardian of Nadine Rowe**, a surviving Sibling of Nicholas Rowe, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

169. **Paul Rowe** is a surviving Sibling of Nicholas Rowe, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

170. **Michelle Baker** is a surviving Fiancée of Nicholas Rowe, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

171. **Alexander Rowe on behalf of the Estate of Judith Rowe**, a surviving Parent of Nicholas Rowe, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

172. **Victor Santillan** is a surviving Sibling of Maria Theresa Santillan, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

173. **Raymond Santillan** is a surviving Sibling of Maria Theresa Santillan, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

174. **Kirsten Saracini** is a surviving Child of Victor Saracini, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

175. **Brielle Saracini** is a surviving Child of Victor Saracini, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

176. **Lori Brody** is a surviving Sibling of Scott Schertzer, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

177. **Ellen Schertzer** is a surviving Parent of Scott Schertzer, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

178. **Patricia Sloan** is a surviving Parent of Paul K. Sloan, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

179. **Matt Sloan** is a surviving Sibling of Paul K. Sloan, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

180. **Sarah Funk** is a surviving Sibling of Paul K. Sloan, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

181. **Gail Smith** is a surviving Step-Mother of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

182. **Raymond Smith on behalf of the Estate of Marion Thomas**, a surviving Grandmother of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

183. **Raymond Smith on behalf of the Estate of Deborah Sallad**, a surviving sibling, of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

184. **Martin Smith** is a surviving Nephew of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

185. **Raymond Smith as legal guardian of Troia Johnson**, a surviving Niece of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

186. **Tawanda Smith** is a surviving Niece of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

187. **Danielle Smith** is a surviving Niece of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

188. **Diane Smith** is a surviving Niece of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

189. **Carl Smith** is a surviving Sibling of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

190. **Kevin Smith** is a surviving Sibling of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

191. **Korry Smith** is a surviving Sibling of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

192. **Tanya Warren** is a surviving sibling of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

193. **Latricia Smith** is a surviving Sibling of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

194. **Elaine Smith** is a surviving Sibling of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

195. **Christine Jackson** is a surviving Sibling of George Smith, one of the 9/11

Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

196. **Barbara Hargrove** is a surviving Sibling of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

197. **Raymond Smith, Jr., named in his own right and on behalf of the Estate of George Smith** is a surviving Sibling of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

198. **Gail Smith as parent and natural guardian of Samuel Collazo**, a surviving Step-brother of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

199. **Gabriella Rinehart** is a surviving Step-Sister of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

200. **Raymond Woods** is a surviving Cousin of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

201. **Scott Woods** is a surviving Cousin of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

202. **Lisa Smith** is a surviving Cousin of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

203. **Angela LaGrand** is a surviving Cousin of George Smith, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

204. **Gail Smith as Parent and Natural Guardian of Leonardo Collazo**, a surviving Step-Brother of George Smith, one of the 9/11 Decedents killed as a result of

the Al Qaeda terrorist attacks on September 11, 2001.

205. **Timothy P. Soulas, Jr.** is a surviving Child of Timothy Soulas. Sr. , one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

206. **Andrew J. Soulas** is a surviving Child of Timothy Soulas, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

207. **Katherine Soulas as parent and natural guardian of Christopher Soulas, a minor**, a surviving Child of Timothy Soulas, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

208. **Katherine Soulas as parent and natural guardian of Matthew Soulas, a minor**, a surviving Child of Timothy Soulas, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

209. **Katherine Soulas as parent and natural guardian of Nicole Soulas, a minor**, a surviving Child of Timothy Soulas, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

210. **Katherine Soulas as parent and natural guardian of Daniel Soulas, a minor**, a surviving Child of Timothy Soulas, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

211.

212. **Frederick Soulas** is a surviving Parent of Timothy Soulas, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

213. **Stephen Soulas** is a surviving Sibling of Timothy Soulas, one of the 9/11

Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

214. **Frederick Soulas, III** is a surviving Sibling of Timothy Soulas, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

215. **Dan Soulas** is a surviving Sibling of Timothy Soulas, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

216. **Michelle Donlan** is a surviving Sibling of Timothy Soulas, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

217. **Brian David Huber** is a surviving Nephew of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

218. **Daniel Huber** is a surviving Nephew of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

219. **Darren Steiner** is a surviving Child of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

220. **Jordan Steiner** is a surviving Child of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

221. **Meredith Reverdito** is a surviving Child of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

222. **Robert Steiner on behalf of the Estate of Wilma Steiner**, a surviving Parent of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

223. **Kaitlin Steiner Keller** is a surviving Niece of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

224. **Robert Steiner** is a surviving Sibling of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

225. **Denise Steiner Donohue** is a surviving Niece of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

226. **Denise Steiner Donohue and Eleanor Steiner as Co-Executors on behalf of the Estate of Dawn Steiner, a surviving Niece of William Steiner,** one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

227. **Kristyn Steiner-Martin** is a surviving Niece of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

228. **George M. Steiner,** a surviving nephew of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

229. **Addison Friedman** is a surviving Nephew of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

230. **Adriana Friedman** is a surviving Niece of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

231. **Anthony Friedman-Ceraso** is a surviving Nephew of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

232. **Kristen Druckenmiller** is a surviving Niece of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

233. **Heather Caudill** is a surviving Niece of William Steiner, one of the 9/11

Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

234. **Stephanie Feher** is a surviving Niece of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

235. **George Steiner** is a surviving Sibling of William Steiner, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

236. **Louise Borzumato** is a surviving Grandmother of Andrew Stergiopoulos, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

237. **Kathleen Stergiopoulos** is a surviving Sibling of Andrew Stergiopoulos, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

238. **George Stergiopoulos, Jr.** is a surviving Sibling of Andrew Stergiopoulos, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

239. **Aaron Straub** is a surviving Child of Edward W. Straub, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

240. **Sandra Straub as parent and natural guardian of Jonathan Straub**, a minor, a surviving Child of Edward W. Straub, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

241. **Sandra Straub as parent and natural guardian of Michael Struab**, a minor, a surviving Child of Edward W. Straub, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

242. **Edward Straub** is a surviving Parent of Edward W. Straub, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

243. **Stanley Straub** is a surviving Brother of Edward W. Straub, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

244. **Matthew Straub** is a surviving Brother of Edward W. Straub, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

245. **Salvatore Tino** is a surviving Parent of Jennifer Tino, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

246. **Jeffrey Tino** is a surviving Sibling of Jennifer Tino, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

247. **Salvatore Tino, Jr.** is a surviving Sibling of Jennifer Tino, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

248. **Adam Fuller** is a surviving Nephew of Meta Waller, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

249. **Nina Fuller** is a surviving Niece of Meta Waller, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

250. **Joseph Nicklo** is a surviving Sibling of Jeanmarie Wallendorf, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

251. **Mellanie Chafe** is a surviving Sibling of Jeanmarie Wallendorf, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

252. **Christopher Barton** is a surviving Sibling of Jeanmarie Wallendorf, one

of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

253. **Christine Barton Pence as Parent and Natural Guardian of John Barton**, a minor, a surviving Sibling of Jeanmarie Wallendorf, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

254. **Susanne Ward-Baker** is a surviving Parent of Timothy Ward, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

255. **Norma Ward** is a surviving Step-Mom of Timothy Ward, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

256. **Jessica Kramer** is a surviving Step-Sibling of Timothy Ward, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

257. **Christi Pendergraft** is a surviving Step-Sibling of Timothy Ward, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

258. **Robert Ward** is a surviving Uncle of Timothy Ward, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

259. **Richard Ward** is a surviving Uncle of Timothy Ward, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

260. **Carl L. Ward** is a surviving Uncle of Timothy Ward, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

261. **Lance Ward** is a surviving Cousin of Timothy Ward, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001. **Mike**

**Smith** is a surviving Cousin of Timothy Ward, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001. ...

262. **Jason Smith** is a surviving Cousin of Timothy Ward one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.,

263. **Marc Ward** is a surviving Cousin of Timothy Ward, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

264. **Norma Ward as Legal Guardian of Brianna Scoggins, a minor**, a surviving Nieceof Timothy Ward, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

265. **Norma Ward as Legal Guardian of Shawn Pendergraft, a minor**, a surviving Nephew of Timothy Ward, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

266. **Norma Ward as Legal Guardian of Charles Pendergraft, a minor**, a surviving Nephew of Timothy Ward, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

267. **Deborah Zeplin, representative in her own right and as Personal Representative of the Estate of Marc Scott Zeplin**, is a surviving Spouse of Marc Scott Zeplin, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001, .

268. **Deborah Zeplin as parent and natural guardian of Ryan Zeplin, a minor**, a surviving Child of Marc Scott Zeplin, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001.

269. **Deborah Zeplin as parent and natural guardian of Ethan Zeplin, a minor**, a surviving Child of Marc Scott Zeplin, one of the 9/11 Decedents killed as a result of the Al Qaeda terrorist attacks on September 11, 2001

### **DEFENDANTS**

#### ***Islamic Republic Of Iran***

270. Defendant, the Islamic Republic of Iran (“Iran”), is a foreign state within the meaning of 28 U.S.C. § 1391(f). Iran maintains an Interest Section within the United States at the Embassy of Pakistan at 2204 Wisconsin Avenue, N.W., Washington, D.C. 20007.

271. Iran has for many years been designated as a foreign state that sponsors terrorism within the meaning of the Export Administration Act of 1979, 50 U.S.C. App. §2405(j), and the Foreign Assistance Act of 1961, 22 U.S.C. § 2371(b). Iran has repeatedly been found liable under the Foreign Sovereign Immunities Act, 28 U.S.C. §1602 et seq., for deaths and injuries caused by its activities as a state sponsor of international terrorism, particularly in connection with acts perpetrated by the paramilitary terrorist organization sponsored by Iran known as “Hizballah” or “Hezbollah.” Iran’s involvement in international terrorism has been documented in a long line of cases in this court, including recent decisions in *Estate of Heiser v. Islamic Republic of Iran*, 659 F.Supp.2d 20 (D.D.C. 2009) and *Valore v. Islamic Republic of Iran*, 700 F.Supp.2d 52 (D.D.C. 2010).

272. Since the time Iran was designated by the State Department as a state sponsor of terrorism, a large body of evidence has been collected and analyzed which

shows conclusively that Iran views terrorism as an instrument of state policy, like diplomacy or military power - a tool to be used to further political objectives. The evidence shows that Iran has, over the years, directly carried out assassinations, bombings and other terrorist acts against its enemies. It has also provided direct and indirect support to international terrorist groups in the form of money, training, sanctuary, documentation, intelligence, weapons and other types of assistance. Al Qaeda is one such terrorist organization that has received support from Iran.

273. To carry out its policy of terrorism and support for terrorist groups, Iran has created and used government organizations including intelligence ministries, the military, and various types of quasi-governmental companies and entities which are directly answerable to, and receive instructions from, the regime in power. A number of these entities are named herein as the Instrumentality Defendants.

### ***The Instrumentality Defendants***

274. As described herein, Iran acted through its officials, officers, agents, employees, agencies and instrumentalities in providing material support and resources to Al Qaeda. The support provided by Iran assisted in and contributed to the preparation and execution of the plans that culminated in the hijacked flights and the extrajudicial killing of the 9/11 Decedents.

275. The following Instrumentality Defendants were among the officials, officers, agents, employees, agencies and instrumentalities through which Iran supported Al Qaeda and contributed to the terrorist acts that resulted in the death of the 9/11 Decedents:

(a) The Supreme Leader, Ayatollah Ali Hoseini-Khamenei (“Khamenei”), the undisputed head of the Iranian government. Khamenei has been found to be an instrumentality of Iran for purposes of liability and damages under the Foreign Sovereign Immunities Act. *See, e.g., Flatow v. Islamic Republic of Iran*, 999 F.Supp. 1 (D.D.C. 1998). As head of the Iranian state, Khamenei is responsible for formulating and executing the nation’s policy of supporting terrorism and terrorist groups such as Al Qaeda. As a government agent, Khamenei maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007.

(b) At all times relevant hereto, Ali Akbar Hashemi Rafsanjani (“Rafsanjani”) was the chairman of the Expediency Discernment Council of the Islamic Republic of Iran. As chairman of the council, Rafsanjani is charged with resolving the differences that arise between the Iranian Parliament and the Council of Guardians. In addition to his responsibilities as chairman of the council, Rafsanjani is a former president of Iran, serving in that capacity from 1989 through 1997, and wields great religious and political power in Iran. Rafsanjani was instrumental in planning, sponsoring and hosting several meetings in Iran of Al Qaeda leaders and other worldwide terrorists. It was at these meetings that the plans for the September 11, 2001 terrorist attacks were discussed and finalized.

As a government agent, Rafsanjani maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. In addition, it is believed that Rafsanjani holds a financial interest in several properties throughout the United States.

(c) The Iranian Ministry of Information and Security (the “MOIS”), the Iranian government organization responsible for coordinating Iran’s terrorist activities. The MOIS has been found to be an instrumentality of Iran for purposes of liability and damages under the Foreign Sovereign Immunities Act. *See, e.g., Sutherland. v. Islamic Republic of Iran*, 151 F. Supp.2d 27 (D.D.C. 2001). With a large budget and extensive organization, the MOIS is one of the most powerful ministries in the Iranian government. The ministry has traditionally operated under the guidance of the *Velayat –e Faqih* apparatus of the Supreme Leader. The MOIS is responsible for intelligence collection used to support terrorist operations and for liaison activities with supported terrorist groups such as Al Qaeda.

(d) The Islamic Revolutionary Guard Corps. (the “IRGC”), including its operatives, the Qods Force, the Committee on Foreign Intelligence Abroad and Committee on Implementation of Actions Abroad. The IRGC and its operatives are responsible for extraterritorial operations, including terrorist operations. A primary focus of the Qods Force is training Islamic terrorist groups. It is also responsible for gathering information required for targeting and attack planning.

As a government agency, the IRGC maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007.

(e) Hezbollah (alternatively spelled “Hizbollah”), a surrogate of the MOIS through which the Iranian government executes many of its terrorist plans. Hizbollah is funded, directed and controlled by the Iranian government. Hizbollah, as a government agency, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007.

(f) The Iranian Ministry of Petroleum (the “MOP”), including its affiliated entities, the National Iranian Gas Company, National Iranian Petrochemical Company and the Iranian Offshore Oil Company. The MOP, as a government agency, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The MOP, in conjunction with and through these affiliated entities, generates substantial money that is used by the Iranian

government to fund its terrorist activities, including its support of Al Qaeda.

(g) The National Iranian Tanker Corporation (“NITC”), an Iranian corporation owned and controlled by the Iranian government. The NITC, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The NITC funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Al Qaeda.

(h) National Iranian Oil Corporation (“NIOC”), an Iranian corporation owned and controlled by the Iranian government. The NIOC, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The NIOC funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Al Qaeda.

(i) National Iranian Gas Company (“NIGC”), an Iranian corporation owned and controlled by the Iranian government. The NIGC, as a government controlled entity, maintains a presence in the United States through the Permanent

Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The NIGC funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Al Qaeda.

(j) Iran Air, an Iranian corporation owned and controlled by the Iranian government. Iran Air, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. Iran Air funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Al Qaeda. In addition, Iran Air knowingly assists Iran's efforts to export terrorism by transporting individual terrorists to destinations of their choosing for the purpose of committing terrorist acts in foreign countries.

(k) National Iranian Petrochemical Company ("NIPC"), an Iranian corporation owned and controlled by the Iranian government. The NIPC, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian

Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The NIPC funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Al Qaeda.

(l) Iranian Ministry of Economic Affairs and Finance (“IMEAF”), an agency of the Iranian government. The IMEAF, as a government agency, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The IMEAF funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Al Qaeda.

(m) Iranian Ministry of Commerce (“IMOC”), an agency of the Iranian government. The IMOC, as a government agency, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The IMOC funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Al Qaeda.

(n) Iranian Ministry of Defense and Armed Forces Logistics

(“IMDAFL”), an agency of the Iranian government. The IMDAFL, as a government agency, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The IMDAFL funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Al Qaeda.

(o) The Central Bank of the Islamic Republic of Iran (“CBI”) is a financial institution owned and controlled by the Iranian government. The CBI, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The main offices of the CBI are located at 23 Ferdowsi Avenue, P.O. Box 11365/8551, Tehran, Iran. The CBI keeps accounts for, grants loans to and otherwise funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Al Qaeda.

(p) Islamic Republic of Iran Shipping Lines (“IRISL”), an Iranian corporation owned and controlled by the Iranian government. The IRISL, as a government controlled entity, maintains a presence in the United States through

the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The IRISL funnels funds to the Iranian government with knowledge that the Iranian government uses those funds to support its own terrorist activities as well as those of Al Qaeda.

(q) Bonyad Taavon Sepah, also known as the IRGC Cooperative Foundation, also known as Bonyad-e Ta'avon-e Sepah, also known as Sepah Cooperative Foundation, is a financial entity controlled by the Iranian government. Bonyad Taavon Sepah, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. Bonyad Taavon Sepah was formed by commanders of Defendant IRGC to structure the IRGC's investments. Eight of the nine members of the Bonyad Taavon Sepah's Board of Trustees are senior IRGC personnel, including the Commander in Chief, Mohammad Ali Jafari. Iranian bonyads, including Bonyad Taavon Sepah, are opaque, quasi-official organizations controlled by key current and past Iranian government officials and clerics. Bonyads, including Bonyad Taavon Sepah, receive benefits from the Iranian government but are not required to have their budgets publicly approved. Bonyad Taavon Sepah offers preferential financial services to IRGC personnel. The main offices of the Bonyad Taavon Sepah are located at Niayes Highway, Seoul Street, Tehran, Iran.

(r) Ansar Bank, also known as Ansar Finance and Credit Fund, also known as Ansar Financial and Credit Institute, formerly known as Ansar Institute, formerly known as Ansar al-Mojahedin No-Interest Loan Institute, formerly known as Ansar Saving and Interest Free-Loans Fund, is an Iranian corporation owned and controlled by the Iranian government. Ansar Bank, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. Ansar Bank was created by Defendant Bonyad Taavon Sepah to provide financial and credit services to personnel of the Defendant IRGC. IRGC members receive their salaries through Ansar Bank, which also provides special benefits to IRGC personnel. Initially, Ansar Bank operated as a credit union until it transitioned into a fully functioning bank in mid-2009, upon receiving a license from the Defendant Central Bank of Iran. The main offices of Ansar Bank are located at Building No. 539, North Pasdaran Street, Tehran, 19575-497, Iran.

(s) Mehr Bank, also known as Mehr Interest-Free Bank, also known as Mehr Finance and Credit Institute, is an Iranian corporation owned and controlled by the Iranian government. Ansar Bank, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. Mehr Bank was created by Defendant Bonyad Taavon Sepah to provide financial services to the Defendant IRGC's Bassij, a volunteer militia that is controlled by the IRGC. The main offices of Mehr Bank are located at 204

Taleghani Ave., Tehran, Iran.

(t) Moallem Insurance Company is an Iranian corporation owned and controlled by the Iranian government. Moallem Insurance Company, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. Moallem Insurance Company provides maritime insurance to Defendant IRISL and its vessels. Defendant IRISL has been unable to maintain adequate hull and protection-and-indemnity insurance because of international sanctions. In October 2009, the United Kingdom froze all business ties with IRISL under its counter-terrorism authorities, effectively denying IRISL the ability to continue receiving insurance coverage and other services from UK-based protection-and-indemnity clubs. IRISL then sought insurance coverage from other European providers and protection-and-indemnity clubs that declined to provide this business in light of the recent UK action. For a short period, IRISL obtained insurance coverage from a Bermuda-based protection-and-indemnity club until the government of Bermuda enacted a law in January 2010 to mirror the UK action, forcing IRISL out of the Bermuda insurance market. In early 2010, IRISL turned to Tehran-based Moallem Insurance Company, which had not previously been in the business of providing maritime insurance. The main offices of Moallem Insurance Company are located at No. 56 Haghani Boulevard, Vanak Square, Tehran, 1517973511, Iran.

(u) Liner Transport Kish, also known as LTK, is an Iranian corporation owned and controlled by the Iranian government. Liner Transport Kish, as a government

controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. Liner Transport Kish has been utilized by the Defendant IRGC to support terrorist activities outside of Iran, and, accordingly, was designated by the U.S. Department of Treasury pursuant to E.O. 13224, which targets for sanctions terrorists and those providing support to terrorists or acts of terrorism. Liner Transport Kish was founded in 2003. Liner Transport Kish has provided shipping services outside of Iran in support of Hizballah on behalf of the IRGC. The main offices of Liner Transport Kish are located at No. 141, Ground Floor, Kish City Services Building, Kish Island, Iran; additional offices are located at No. 10, 3 Floor, Unit 6, Ebrahimi Junction 8th Bostan St., Tehran, Iran; at No. 537, Polygam Street, Mahmoud Abad Road, Khavar Shahr, Tehran, Iran; at No. 7, 1st Floor, Dehghan Building, Shohada (Yadbood) Square, Bandar Abbas, Iran.

(v) Pars Oil & Gas Company, also known as POGC, is an Iranian corporation owned and controlled by the Iranian government. Pars Oil & Gas Company, as a government controlled entity, maintains a presence in the United States through the Permanent Representative of the Islamic State of Iran to the United Nations, 360 Lexington Avenue, 11<sup>th</sup> Floor, New York, NY 10017, or through the Iranian Interest Section c/o the Embassy of Pakistan, 2204 Wisconsin Avenue, NW, Washington, DC 20007. The U.S. Treasury Department has identified Pars Oil & Gas Company as an entity determined to be owned or controlled by the Government of Iran. Pars Oil & Gas Company is a subsidiary of the Defendant National Iranian Oil Company and was established to develop the South Pars and North Pars gas fields. Until recently, an

Iranian consortium led by a member of the Defendant IRGC handled the development of certain phases of the South Pars gas field. The main offices of Pars Oil & Gas Company are located at No. 133, Side of Parvin Etesami Alley, opposite Sazman Ab - Dr. Fatemi Avenue, Tehran, Iran, and/or at No. 1 Parvin Etesami Street, Fatemi Avenue, Tehran, Iran.

276. At all relevant times, Iran used the Instrumentality Defendants to further its funding and support of terrorist activities against the United States and its citizens, including its support for Al Qaeda.

## **FACTUAL BACKGROUND**

### ***Background of Al Qaeda***

277. In or about 1989, Osama Bin Laden, Muhammad Atef and others founded an international terrorist group that became known as “Al Qaeda” (“the Base”). Osama Bin Laden was the “emir” (prince) of Al Qaeda and was its leader at all relevant times. Members of Al Qaeda pledged an oath of allegiance (called a "bayat") to Osama Bin Laden and Al Qaeda.

278. From 1989 until about 1991, Al Qaeda was headquartered in the Islamic Emirate of Afghanistan and Peshawar, Pakistan. In or about 1991, the leadership of Al Qaeda, including its emir, Osama Bin Laden, relocated to the Sudan. Al Qaeda was headquartered in the Sudan from approximately 1991 until approximately 1996 but also maintained a presence and activities in various parts of the world. In 1996, Osama Bin Laden and other members of Al Qaeda relocated again to the Islamic Emirate of Afghanistan.

279. Bin Laden and Al Qaeda violently opposed the United States for several reasons. First, the United States was regarded as an "infidel nation" because it was not governed in a manner consistent with the group's extremist interpretation of Islam. Second, the United States was viewed as providing essential support for other "infidel" governments and institutions. Third, Al Qaeda opposed the involvement of the United States armed forces in the Gulf War in 1991 and in Operation Restore Hope in Somalia in 1992 and 1993. In particular, Al Qaeda opposed the continued presence of American military forces in Saudi Arabia (and elsewhere on the Arabian peninsula) following the Gulf War. Fourth, Al Qaeda opposed the United States Government because of the arrest, conviction and imprisonment of persons belonging to Al Qaeda or its affiliated terrorist groups or those with whom it worked. For these and other reasons, Bin Laden declared jihad, or holy war, against the United States, which he carried out through Al Qaeda and its affiliated organizations.

280. At relevant times, Al Qaeda functioned both on its own and through terrorist organizations that operated under its umbrella, including Egyptian Islamic Jihad, which was led by Ayman al-Zawahiri, the Islamic Group (also known as "el Gamaa el Islamia" or simply "Gamaa't"), and a number of jihad groups in other countries, including the Sudan, Egypt, Saudi Arabia, Yemen, Somalia, Eritrea, Djibouti, Afghanistan, Pakistan, Bosnia, Croatia, Albania, Algeria, Tunisia, Lebanon, the Philippines, Tajikistan, Azerbaijan, the Kashmiri region of India and the Chechnyan region of Russia. Al Qaeda also maintained cells and personnel in a number of countries to facilitate its activities, including Kenya, Tanzania, the United Kingdom, Germany, Canada, Malaysia, and the

United States.

281. Al Qaeda had a command and control structure which included a “majlis al shura” (or consultation council) which discussed and approved major undertakings, including terrorist operations. Al Qaeda also had a "military committee" which considered and approved "military" matters.

282. Bin Laden and Al Qaeda forged alliances with representatives of the government of Iran, and its associated terrorist group Hezbollah, for the purpose of working together against their perceived common enemy in the West, the United States.

283. At relevant times, Bin Laden and Al Qaeda sponsored, managed, and/or financially supported training camps in Afghanistan. Those camps were used to instruct members and associates of Al Qaeda and its affiliated terrorist groups in the use of firearms, explosives, chemical weapons, and other weapons of mass destruction. In addition to providing training in the use of various weapons, these camps were used to conduct operational planning against United States targets around the world and experiments in the use of chemical and biological weapons. These camps were also used to train Al Qaeda members in security and counterintelligence methods, such as the use of codes and passwords, and to teach members and associates of Al Qaeda about traveling to perform operations. For example, Al Qaeda instructed its members and associates to dress in "Western" attire and to use other methods to avoid detection by security officials. The group also taught its members and associates to monitor media reports of its operations to determine the effectiveness of their terrorist activities.

284. During the time from about 1996 when Al Qaeda operated from its

headquarters in the Afghanistan, Bin Laden and Al Qaeda forged close relations with the ruling regime, known as the “Taliban,” and Taliban leader Muhammad Omar. Bin Laden openly informed other Al Qaeda members and associates outside Afghanistan of their support of, and alliance with, the Taliban and Omar.

285. One of the principal goals of Al Qaeda was to drive the United States armed forces out of Saudi Arabia (and elsewhere on the Arabian peninsula) and Somalia by violence. These goals eventually evolved into a declaration of jihad (holy war) against America and all Americans. Members of Al Qaeda issued “fatwahs” (rulings on Islamic law) indicating that such attacks on Americans were both proper and necessary.

286. Like Iran, Al Qaeda and Bin Laden used terrorism as an instrument of policy, as a tool to be used to further political objectives. Al Qaeda has, over the years, directly carried out murders, bombings and other terrorist acts against its enemies. It has also provided direct and indirect support to other international terrorist groups and received support in return, often in the form of money, training, sanctuary, documentation, intelligence, weapons and other types of assistance.

287. Al Qaeda has often used operatives such as the hijackers to actively engage in terrorist activities against the United States and its citizens. In conducting those terrorist activities, Al Qaeda received financial, logistical and other material support from Iran other foreign states.

### ***Iran’s Sponsorship of Terrorism and Al Qaeda***

288. For many years, the Department of State has included Iran among the “*state sponsors of terrorism*.” Indeed, the Department of State has repeatedly described Iran as

*“the most active”* state sponsor of terrorism.

289. At relevant times, Iran provided material support to Bin Laden and Al Qaeda, often through Iran’s state-sponsored terrorist organization, Hezbollah. That support included advice and assistance in planning attacks against American targets, as well as financial and logistical support for particular operations such as the 9/11 attacks.

290. On October 31, 1991, Iran hosted the International Conference for the Support of the Muslim Palestinian People’s Revolution, which was attended by radical Palestinian groups, both Islamic and secular. The conference established a permanent secretariat, funded by Iran, to coordinate pro-intifada activities. In doing so, Iran tightened its ties to the radical groups Palestinian HAMAS and Islamic Jihad.

291. At various times in or about 1992 and 1996, Bin Laden and other ranking members of Al Qaeda, made it known that they favored a policy under which Al Qaeda would put aside its differences with Shiite Muslim terrorist organizations, including the government of Iran and its affiliated terrorist group Hezbollah, in order to coordinate attacks against their perceived common enemy, the United States.

292. On or before 1994, Al Qaeda forged an alliance with the National Islamic Front of Sudan and with representatives of the government of Iran, and its associated terrorist group Hezbollah, for the purpose of working together against the United States and other perceived common targets.

293. Hezbollah is financed by the Iranian government. The amounts of Iranian government contributions to Hezbollah have varied over the years, ranging from an estimated 15-20 million dollars annually, to as much as 100-120 million dollars annually.

Sheikh Subhi al-Tufeili, Hezbollah's first leader, stated:

To deny the Iranian connection to Lebanon's Hezbollah would be like denying that the sun provides light to the earth. Who can deny such a thing?

294. Hezbollah's manifesto, as declared by Hezbollah's spokesman, Sheikh Ibrahim al-Amin states:

We, the sons of Hezbollah's Nation in Lebanon, whose vanguard God has given victory in Iran and which has established the nucleus of the world's central Islamic state, abide by the orders of a single wise and just command currently embodied in the supreme examples of Ayatollah Khomeini.

From this basis, we in Lebanon are not a closed organizational structural party, nor are we a narrow political framework, but we are a nation interconnecting with all Muslims of the World. We are linked by a strong ideological and political connection - Islam.

From here what befalls the Muslims in Afghanistan, Iraq, the Philippines or anywhere else verily afflicts the body of our own Islamic nation of which we are an inseparable part, and moved to confront it on the basis of our main legal obligation in light of the political view decided by our leader Wilayat al-Faqih [Ayatollah Khomeini].

295. At various times in or about 1992 and 1996, Al Qaeda, and its affiliate Egyptian Islamic Jihad, sent members to Lebanon to receive training from Hezbollah.

296. Ali Mohamed, charged with the 1998 bombing of the two United States Embassies in Africa, in his guilty plea hearing on October 20, 2000, testified as follows:

I was aware of certain contacts between Al Qaeda and al Jihad organization, on one side, and Iran and Hezbollah on the other side. I arranged security for a meeting in the Sudan between Mughaniyah, Hezbollah's chief, and Bin Laden. Hezbollah provided explosives training for Al Qaeda and al Jihad. Iran supplied Egyptian Jihad

with weapons. Iran also used Hezbollah to supply explosives that were disguised to look like rocks.

297. By mid-1995, Dr. Mahdi Chamran Savehi, an Iranian government official charged with coordinating anti-Western terrorism, met with key Hezbollah leaders from Lebanon to coordinate training and operational preparations.

298. At various times in or about 1992 and 1996, Mamdouh Mahmoud Salim, a member of the majlis al Shura (or consultation council) of Al Qaeda met with an Iranian religious official in Khartoum, Sudan as part of an overall effort to arrange a tripartite pact between Al Qaeda, the National Islamic Front of Sudan and the government of Iran to work together against the United States, Israel and other western countries.

299. In early 1996, Iran reorganized its intelligence system by establishing the Supreme Council for Intelligence Affairs directly under President Ali Akhbar Hashemi-Rafsanjani.

300. Following the reorganization in 1996, Iran dedicated large allocations of funds and assets to internal security and the “export of the Islamic Revolution,” two areas primarily focused on foreign intelligence and terrorism sponsorship.

301. A central aspect of this reform was placing Dr. Mahdi Chamran Savehi as Chief of External Intelligence, in charge of the entire network of international terrorism, including the al-Quds forces.

302. Iran was subsequently linked to the 1996 Khobar bombing. The indictment against Ahmed Al-Mughassil and others states:

From some time in the 1980’s until the date of filing of this Indictment, Hizballah, or “Party of God” was the name used by a number of related terrorist organizations operating in

Saudi Arabia, Lebanon, Kuwait, and Bahrain, among other places. These Hizbollah organizations were inspired, supported, and directed by elements of the Iranian government. Saudi Hizballah Al-Hijaz, was a terrorist organization that operated primarily in the Kingdom of Saudi Arabia and that promoted, among other things, the use of violence against nationals and property of the United States located in Saudi Arabia. Because Saudi Hizballah was an outlaw organization in the Kingdom of Saudi Arabia, its members frequently met and trained in Lebanon, Syria, or Iran.

303. According to the United States Justice Department, information was provided to Iranian officials about the planned Khobar operation by Saudi Hezbollah. Additionally, an Iranian military officer directed the plotters to surveil sites for attacks against Americans, and the Saudi Hezbollah leader asserted that he enjoyed close ties to Iranian officials who were providing his group with financial support.

304. On June 7, 1996, Iran's spiritual leader, Ayatollah Ali Khamenei, declared that Hezbollah must reach "all continents and all countries."

305. In early June of 1996, Iran organized a pan-Islamist summit which had a primary objective of establishing an international coordination committee to oversee anticipated escalation in hostilities. Ayatollah Ahmad Jannati, a close associate of Ayatollah Khomeini, emerged as the spokesperson for the working group. The meeting was organized jointly by the Supreme Council for Intelligence Affairs and IRCG (Iranian Revolutionary Guard Corps) high command. Attending the working group were the following: Ramadan Shallah (head of the Palestine Islamic Jihad); Ahmad Salah, a.k.a. Mamdouh Mahmoud Salim (Egyptian Islamic Jihad); Imad Mughniyah (Hezbollah); Muhammad Ali Ahmad (a representative of Al Qaeda and Osama Bin Laden); Ahmad

Jibril (head of the Popular Front for the Liberation of Palestine-General Command); Imad al-Alami and Mustafa al-Liddawi (HAMAS); and Abdullah Ocalan (Kurdish People Party). The summit participants agreed on the unification of their financial system and training.

306. In or about July 1996, Osama Bin Laden met with an Iranian intelligence official in Afghanistan.

307. In early October 1996, Bin Laden visited Tehran for consultations. One of the issues addressed was the unification of various Egyptian terrorist organizations. Iranian intelligence Minister Ali Fallahian chaired the meeting with representatives from the Iranian Interior Ministry, Islamic Guidance Ministry, and Foreign Ministry. Among the Egyptians attending were the Tehran based aide of defendant Ayman al Zawahiri, Kamal Ujayzah, and Mustafa Hamzah. The Iranians discussed specific long-term operational plans and explained to the Egyptian attendees that the degree of Iran's support depended on the extent of their unity. The Egyptian attendees agreed to form a unified command with Osama Bin Laden for operational purposes.

308. In or about mid-September 1997, the Iranian leadership met to discuss the new course of the anti-American struggle. The participants included Iran's supreme and spiritual leader Ayatollah Ali Khamenei. Also present were newly-elected president Mohammad Khatami, former president Ali Akbar Hashemi-Rafsanjani, and the minister of intelligence, Qurban Ali Dari Najafabadi. Other participants in this conference were: General Rahim Safavi (the Commander-in-Chief of the IRGC); General Mohsen Rezai (former Commander-in-Chief of IRGC, now responsible for reorganizing the Iranian

security services and their networks); Ali Fallahian (former intelligence minister); Mohammed Mohammadi Rayshahri (former intelligence minister, present as Khamenei's special adviser on intelligence affairs); Hossein Sheikh-ol-Islam (Iran's former deputy foreign minister and once again director on the Office of Liberation Movements); Ali Akbar Mohtashemi; General Diya Sayfi (the commander of the IRGC forces in Lebanon); members of the Supreme National Security Council; and senior IRGC and intelligence officials.

309. In or about September 20-23, 1997, Iranian intelligence organized a major summit of terrorist leaders from all over the world. Among the participants were: Imad Mughniyah and Abdul-Hadi Hammadi (Hezbollah); Ayman al-Zawahiri (Egyptian Islamic Jihad); Ahmad Jibril (chief of the Popular Front for the Liberation of Palestine-General Command PFLP-GC); Osama Abu-Hamden and Imad al-Alami (HAMAS); Ramadan al-Shallah (chief of Palestinian Islamic Jihad); and three commanders representing branches of Hezbollah in the Persian Gulf States.

310. Participants at the summit examined the Islamists' ability to escalate terrorism against the United States and the West. Several senior Iranian officials addressed the summit and ordered the terrorist leaders to be ready to launch an unprecedented international terrorist campaign.

311. In or about late September 1997, the Iranian leadership met again to discuss the course of the forthcoming terrorism offensive in light of the resolutions and findings of the recent international terrorist summit.

312. Osama Bin Laden held a war council in late 1997 in Kandahar with senior

Islamist commanders from all over the world to discuss forthcoming operations to undermine the American presence and influence in the Middle East. Ayman al-Zawahiri participated in this conference. Conference participants resolved to concentrate on hitting American targets wherever they could be found.

313. In or about late October 1997, the Vanguard of Conquest and the Egyptian Islamic Jihad group, both under the command of Ayman al-Zawahiri, issued a communiqué that declared the forthcoming jihad by saying:

The Islamic Jihad against America's world dominance, the international influence of the Jews, and the U.S. occupation of Muslim lands will continue. ... The United States realizes that its real enemy, as it has declared many times, is Islamic extremism, by which it means the Islamic Jihad, the Jihad of the entire Muslim Nation against the world dominance of America, the international influence of the Jews, and the U.S. occupation of Muslim lands. The Islamic Jihad is against the world dominance of America, the international influence of the Jews, and the U.S. occupation of Muslim lands. The Islamic Jihad is against the theft of the Muslim Nation's riches, this disgusting robbery, the like of which has not been witnessed in history. ... Yes, America's enemy is Islamic extremism, meaning the Islamic Jihad against America's preeminence ... the Islamic Jihad which stands against Jewish expansion.

314. The United States Department of State described Iran as "the most active sponsor of state terrorism in 1997," with its agents held responsible for at least thirteen assassinations, mainly against members of the Kurdish Democratic Party of Iran and the Mujahedin-e Khalq organization, both based in Iraqi Kurdistan.

315. In the second half of November 1997, Ayatollah Ali Khamenei convened a meeting with General Rahim Safavi and Ahmad Vahidi, the former commander of al-Quds Forces, to discuss the establishment of a new elite terrorist force to carry out

spectacular, but deniable, terrorist strikes against the United States and the West.

316. Al Qaeda telephone bills of international calls between 1996 and 1998 were analyzed by United States investigators, showing that nearly 10% of the outgoing calls from Afghanistan went to Iran.

317. According to the State Department's *Patterns of Global Terrorism 2000*, Iran remained the most active state sponsor of terrorism in 2000. It provided increasing support to numerous terrorist groups, including the Lebanese Hezbollah, HAMAS, and the Palestine Islamic Jihad (PIJ), which seek to undermine the Middle East peace negotiations through the use of terrorism.

318. The State Department's *Patterns of Global Terrorism 2000* also stated that Iran's "Revolutionary Guard Corps (IRGC) and Ministry of Intelligence and Security (MOIS) continued to be involved in the planning and execution of terrorist acts and continued to support a variety of groups that use terrorism to pursue their goals."

319. In January 2001, Dr. Ayman al-Zawahri and other Al Qaeda leaders met with Iranian intelligence officials at a mountain guesthouse near the town of Varamin, just south of Tehran. The Iranian delegation was headed by Hojjat-ol islam Ali Akbar Nateq-Nouri and included Imad Fayeز Mugniyeh, a Lebanese operative and leader of Hezbollah who is credited with numerous terrorist attacks on Americans. The purpose of the meeting was to plan and coordinate Iranian support for an upcoming Al Qaeda operation against the United States.

320. On May 4, 2001, a second planning meeting between Al Qaeda and Iranian intelligence officials was held in Iran. Attendees at this planning meeting included

Khamenei, Rafsanjani, and Bin Laden's son, Saad Bin Laden. Iranian intelligence memos written in the weeks following the meeting advise Iranian operatives to be prepared for U.S. retaliation for an attack planned for September 2001.

### ***The September 11 Terrorist Attacks***

321. Prior to September 11, 2001, Al Qaeda, with the aid, assistance and support of defendants, planned, funded and coordinated an attack upon American citizens. On September 11, 2001, nineteen Al Qaeda operatives carried-out that heinous attack by hijacking four airliners and causing them to crash into the World Trade Center Towers, the Pentagon Building and a field in Shanksville, Pennsylvania. The Al Qaeda operatives who executed that murderous attack were the following:

(a) Marwan Al-Shehhi, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 175 and flew it into the South Tower of the World Trade Center on September 11, 2001. Al-Shehhi went through flight training in Florida with hijacker Muhammad Atta and may have been flying the second plane to hit the Trade Center. Prior to arriving in the United States, Marwan Al-Shehhi was a student at Technical University in Hamburg, Germany with Atta and hijacker Ziad Jarrah. Al-Shehhi is known to have been an operative in the Al Qaeda terrorist network.

(b) Ahmed Hassan Al Qadi Banihammad ("Banihammad"), a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 175 and flew it into the South Tower of the World Trade Center on September 11, 2001. Banihammad listed the Spartan School of

Aeronautics in Tulsa, Oklahoma as his home address although school officials have no record of his attendance. Banihammad is known to have been an operative in the Al Qaeda terrorist network.

(c) Ahmed Alghamdi, also known as Ahmed Salah Alghamdi, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 175 and flew it into the South Tower of the World Trade Center on September 11, 2001. Ahmed Alghamdi has been identified as one of five hijackers who fraudulently obtained state identity cards in Virginia. *Al Watan*, an Arabic newspaper, reported that Alghamdi was a Saudi from Baha province who left the country in early 2000 for Chechnya. Immigration records in the Philippines showed he made several visits in the past two years. Alghamdi has direct links to Osama Bin Laden and the Al Qaeda terrorist network.

(d) Hamza Alghamdi, also known as Hamza Al-Ghamdi, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 175 and flew it into the South Tower of the World Trade Center on September 11, 2001. U.S. officials have identified Alghamdi as having known links to the Al Qaeda network.

(e) Mohand Alshehri, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 175 and flew it into the South Tower of the World Trade Center on September 11, 2001. Alshehri is known to have been an operative in the Al Qaeda terrorist network.

(f) Satam M. A. Al Suqami, a citizen of the United Arab Emirates, has

been identified by the FBI as one of the persons who hijacked American Airlines Flight 11 and flew it into the North Tower of the World Trade Center on September 11, 2001. Satam Al Suqami has used a birth date of June 28, 1976. Investigators have linked Suqami to Raed Hijazi who has been implicated in a plot to kill Americans and other tourists in Jordan on January 1, 2000. Suqami is known to have been an operative in the Al Qaeda terrorist network.

(g) Abdulaziz Alomari, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 11 and flew it into the North Tower of the World Trade Center on September 11, 2001. Abdulaziz Alomari has used birth dates of December 24, 1972 and May 28, 1979. Alomari is believed to be a pilot. Alomari is known to have used false identification documents, including a Virginia driver's license that he fraudulently obtained a month before the attack on the World Trade Center. Alomari is known to have been an operative in the Al Qaeda terrorist network.

(h) Waleed M. Alshehri, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 11 and flew it into the North Tower of the World Trade Center on September 11, 2001. Alshehri held multiple false passports. Alshehri is known to have had direct contacts with the Al Qaeda terrorist network.

(i) Wail M. Alshehri, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 11 and flew it into the North Tower of the World Trade Center on September 11, 2001.

Alshehri is believed to be a pilot. Alshehri used a birth date of September 1, 1968 and had a rental address in Hollywood, Florida. Alshehri is known to have been an operative in the Al Qaeda terrorist network.

(j) Mohamed Atta, a citizen of Egypt, has been identified by the FBI as one of the terrorists who hijacked American Airlines Flight 11 and flew it into the North Tower of the World Trade Center on September 11, 2001. Atta is believed to have piloted the first plane into the World Trade Center. Investigation reveals that he studied at the Technical University in Hamburg, Germany and received flight training in Florida. Investigators believe that Atta met with Iraqi intelligence officials in Prague and also met with Islamic extremists in Spain. Atta also inquired about crop dusters in Florida. In Atta's luggage, which did not make American Airlines Flight 11, investigators found a four-page handwritten document in Arabic that included a checklist for the day of the attack. Atta is known to have been an operative in the Al Qaeda terrorist network.

(k) Khalid Almihdhar, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 77 and flew it into the Pentagon Building on September 11, 2001. Khalid Almihdhar is believed to have met with Bin Laden operatives in Malaysia in early 2000 and is known to have been an operative in the Al Qaeda terrorist network.

(l) Nawaf Alhazmi, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 77 and flew it into the Pentagon Building on September 11, 2001. A car registered to Nawaf

Alhazmi was found at Dulles International Airport the day after the attacks. It contained a cashier's check made out to a flight school in Phoenix. Also found were four drawings of the cockpit of a 757 jet and a box-cutter type knife. Nawaf Alhazmi also had maps of Washington and New York as well as a four-page handwritten document in Arabic which included a checklist for the day of the attack identical to the one found in the luggage of fellow terrorist Mohamed Atta and also identical to a third such document recovered from the crash site in Pennsylvania. Nawaf Almihdhar is known to have been an operative in the Al Qaeda terrorist network.

(m) Hani Hanjour, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 77 and flew it into the Pentagon Building on September 11, 2001. Investigators advised that Hanjour is believed to have been at the controls of the Boeing 757 that crashed into the Pentagon. Hanjour had flight training in San Diego, Phoenix and Scottsdale, Arizona. Hanjour is one of five hijackers identified as obtaining a false Virginia identity card at the Arlington, Virginia Department of Motor Vehicles on August 2, 2001. Hanjour lived in the United States intermittently for more than a decade before the attacks. Hanjour is known to have been an operative in the Al Qaeda terrorist network.

(n) Salem Alhazmi, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 77 and flew it into the Pentagon Building on September 11, 2001. Alhazmi is believed to have

had addresses in Fort Lee and Wayne, New Jersey. Alhazmi was among five terrorists who acquired false identification cards on August 2, 2001 from the Virginia Department of Motor Vehicles. Alhazmi is known to have been an operative in the Al Qaeda terrorist network.

(o) Majed Moqed, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked American Airlines Flight 77 and flew it into the Pentagon Building on September 11, 2001. Moqed acquired false identification cards in Virginia on August 2, 2001 and is known to have been an operative in the Al Qaeda terrorist network.

(p) Ziad Samir Jarrah, a citizen of Lebanon, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 93 on September 11, 2001. Jarrah is listed as a pilot in Hamburg, Germany aviation records and is believed to have been piloting Flight 93 when it crashed in Pennsylvania. Jarrah is believed to be part of the Al Qaeda cell in Hamburg, Germany that included terrorists Mohamed Atta and Marwan Al-Shehhi.

(q) Ahmed Ibrahim A. Al Haznawi, also known as Ahmed Alhaznawi (“Alhaznawi”), a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 93 and flew it into a field in Shanksville, Pennsylvania on September 11, 2001. Alhaznawi has used a birth date of October 11, 1980 and is believed to be from the Saudi town of Baljurshi. News accounts have identified Alhaznawi as the son of a Saudi religious cleric, Sheik Ibrahim Alhaznawi, the leader of a mosque in the Saudi town of Hezna. On

April 15, 2002, the Arab satellite television network Al Jazeera broadcast a videotape which shows Alhaznawi reading from a document dated March 6, 2001 titled “*the last Will of the New York and Washington battle martyrs.*” In discussing his role in the September 11 terrorist attacks, Alhaznawi states that “*it is time to kill Americans in their homeland, among their sons, and near their forces and intelligence.*” Alhaznawi is known to have been an operative in the Al Qaeda terrorist network.

(r) Saeed Alghamdi, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 93 and flew it into a field in Shanksville, Pennsylvania on September 11, 2001. Alghamdi had previously been linked to Bin Laden and is known to have been an operative in the Al Qaeda terrorist network.

(s) Ahmed Alnami, a citizen of Saudi Arabia, has been identified by the FBI as one of the persons who hijacked United Airlines Flight 93 and flew it into a field in Shanksville, Pennsylvania on September 11, 2001. Alnami is known to have been an operative in the Al Qaeda terrorist network.

322. On September 11, 2001, five of the Al Qaeda hijackers - Mohammed Atta, Abdul Alomari, Wail al-Shehri, Waleed al-Shehri, and Satam al-Suqami, hijacked American Airlines Flight 11 carrying 92 persons, bound from Boston to Los Angeles, and crashed it into the North Tower of the World Trade Center in New York at approximately 8:46 a.m., causing the collapse of the tower and the deaths of 9/11 Decedents.

323. On September 11, 2001, five Al Qaeda hijackers - Marwan al-Shehhi,

Fayez Ahmed, a.k.a. "Banihammad Fayez," Ahmed al-Ghamdi, Hamza al-Ghamdi, and Mohand al-Shehri - hijacked United Airlines Flight 175 carrying 65 persons, bound from Boston to Los Angeles, and crashed it into the South Tower of the World Trade Center in New York at approximately 9:02 a.m., causing the collapse of the tower and the deaths of 9/11 Decedents.

324. On September 11, 2001, five Al Qaeda hijackers - Khalid al-Midhar, Nawaf al-Hazmi, Hani Hanjour, Salem al-Hamzi, and Majed Moqed - hijacked American Airlines Flight 77 carrying 64 persons, bound from Virginia to Los Angeles, and crashed it into the Pentagon Building in Arlington County, Virginia at approximately 9:37 a.m., causing the deaths of 9/11 Decedents.

325. On September 11, 2001, four of the Al Qaeda hijackers - Ziad Jarrah, Ahmed al-Haznawi, Saaed al-Ghamdi, and Ahmed al-Nami - hijacked United Airlines Flight 93 carrying 45 persons, bound from Newark to San Francisco, and caused it to crash in a field near the town of Shanksville, Pennsylvania at approximately 10:10 a.m., causing the deaths of 9/11 Decedents.

326. The September 11 terrorist hijackings and attacks referenced above resulted in the murder of the 2,976 Decedents. The hijackers used box cutters and knives to commit air piracy and murder on behalf of Al Qaeda. They were assisted in their terrorist campaign by the Iran and the Instrumentality Defendants.

### ***Iran's Support of Al Qaeda After the 9/11 Attacks***

327. Iran and its instrumentalities continued to support Al Qaeda after the September 11 attacks. Former Secretary of Defense Donald Rumsfeld stated on February

3, 2002, “We have any number of reports that Iran has been permissive and allowed transit through their country of Al Qaeda.” On February 4, 2002, Rumsfeld elaborated: “We do have a good deal of information to the effect that Al Qaeda and the Taliban have taken refuge there and others have used it as a transit point. We have no evidence at all that Iran has tried to stop them, that Iran has tried to turn them over to us or some other country or to incarcerate these people, the Al Qaeda, a terrorist network.”

328. The following remarks were made in a background briefing by a United States Department of Defense official on February 19, 2002:

Question: It’s been said that al-Qaida moved into Iran, across the border. Can you shed any light into the numbers and what kind of support they’re getting from the Iranian government?

Answer: I can’t get into numbers. Numbers isn’t a good thing anyway, because they’re never accurate. What I can say is – and I think the Secretary of Defense said – is, we believe the Iranians did help al-Qaida members into – from Afghanistan to Iran. I think I can stick with that.

Question: Iranian – you mean Iranian government?

Answer: Yeah.

Question: At what level?

Answer: ... I can’t get into that right now.

Question: You mean their intelligence, their Revolutionary Guard ...

Answer: Well, there are certain entities that are involved in the Iranian support for terrorism. You know, there’s certain entities within the Iranian government – the Minister of Intelligence and Security, the Islamic Revolutionary Guard

Corps, Qods Force – those are the primary entities that have historically been involved in support for terrorist groups across the board. So those would be the entities that would, you know, have some role in that type of activity.

329. Iran's support of Al Qaeda included the provision of a safe haven for Al Qaeda operatives. For example, Iranian security forces gave safe haven and protection in Tehran to Abu Musaab Zarqawi, a senior Al Qaeda leader who fled the western Afghan city of Herat after the United States military campaign began. Zarqawi later became the leader of Al Qaeda in Iraq where he was responsible for a series of bombings, beheadings and attacks before being killed by U.S. forces in June 2006.

330. On July, 28, 2011, the U.S. Treasury Department designated a node of the Al Qaeda terror network based inside Iran, freezing all of its financial assets under U.S. jurisdiction and prohibiting any transactions with its identified operatives. The Treasury Department stated that some members of the network are based outside of Iran, but funnel recruits and cash through Iran "under an agreement between al Qaeda and the Iranian government."

331. One member of this network is Atiyah Abd al-Rahman ("Rahman"). The documents captured in the safe house occupied by Osama Bin Laden at the time of his capture identify Rahman as Bin Laden's top deputy. According to the Treasury Department, Rahman is Al Qaeda's "overall commander in Pakistan's tribal areas and as of late 2010, the leader of al Qaeda in North and South Waziristan, Pakistan." The Treasury Department adds: "Rahman was previously appointed by Osama bin Laden to serve as al Qaeda's emissary in Iran, a position which allowed him to travel in and out of

Iran with the permission of Iranian officials.” For several years after 9/11, Rahman was protected by the Iranian regime. He is one of the senior al Qaeda leaders supposedly held under a loose form of “house arrest” in Iran.

332. The Iran-based Al Qaeda network is headed by another terrorist, Ezedin Abdel Aziz Khalil (aka Yasin al Suri). The Treasury Department’s designation notes that “Iranian authorities maintain a relationship with Khalil and have permitted him to operate within Iran's borders.” Khalil's activities include moving “money and recruits from across the Middle East into Iran, then on to Pakistan,” where they serve senior al Qaeda leaders.

333. According to David S. Cohen, Under Secretary of Treasury for Terrorism and Financial Intelligence, “There is an agreement between the Iranian government and Al Qaeda to allow this network to operate. There’s no dispute in the intelligence community on this.”

***Defendants Are Liable to Plaintiffs for Their Material Support of Al Qaeda***

334. Defendants instructed, trained, directed, financed and otherwise supported and assisted Al Qaeda, or conspired in the instruction, training, direction, financing, and support of Al Qaeda, in connection with Al Qaeda’s terrorist plans. In furtherance of those plans, the Al Qaeda hijackers deliberately caused planes to crash into the World Trade Center Towers, the Pentagon and a field in Shanksville, Pennsylvania on September 11, 2001.

335. As a direct and proximate result of the intentional, willful, reckless, and careless actions of the defendants, all Plaintiffs have suffered severe and permanent personal injuries, damages, and losses, including the following:

- (a) Decedents' fear of death prior to the crash into and collapse of the World Trade Center Towers, the crash into the Pentagon and the crash of United Airlines flight 93;
- (b) the severe mental anguish suffered by the Decedents and all Plaintiffs;
- (c) the severe pain and suffering suffered by the Decedents and all Plaintiffs;
- (d) the inability of all Decedents to perform the usual household and personal activities that they normally would have performed through the remainder of their natural life expectancies;
- (e) loss of Decedents' earnings and future earning potential;
- (f) loss of Decedents' life and life's pleasures;
- (g) loss of consortium, solatium and/or companionship;
- (h) costs relating to managing the estates of all Decedents; and
- (i) death of the Decedents by way of murder as a result of the defendants' conduct and that of their co-conspirators.

336. The aforementioned deaths, personal injuries and losses experienced by the Plaintiffs were caused by the intentional, outrageous, reckless, and careless acts of all defendants, acting individually and in concert, and of their agents, servants, employees, agencies and instrumentalities, acting within and during the course and scope of their employment, authority, or apparent authority.

### **CLAIMS**

#### **COUNT ONE**

***CLAIMS BY U.S. NATIONAL PLAINTIFFS AGAINST  
ALL DEFENDANTS UNDER SECTION 1605A  
FOREIGN SOVEREIGN IMMUNITIES ACT  
28 U.S.C. §1605A***

337. Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

338. At all relevant times, defendant Iran was a state sponsor of terrorism pursuant to section 1605A of the Federal Sovereign Immunities Act (“FSIA”), 28 U.S.C. §1605A(a)(2)(A)(i).

339. The conduct of the Al Qaeda hijackers constituted acts of extrajudicial killing and torture within the meaning of FSIA §1605A(a)(1).

340. Iran and the Instrumentality Defendants provided material support and resources to Al Qaeda in furtherance of the murderous acts of the Al Qaeda hijackers.

341. At all relevant times, Al Qaeda and the hijackers were agents of Iran acting within the scope of their agency.

342. The conduct of all defendants violated the provisions of the FSIA, in particular 28 U.S.C. §1605A, and all Plaintiffs suffered damages as a result of that violation.

343. Plaintiffs, as estate representatives and family members of certain 9/11 Decedents, are entitled to recover damages from all defendants under the provisions of the FSIA.

344. The injuries and damages suffered by the Plaintiffs by virtue of the death the 9/11 Decedents, and the consequences resulting there from, were proximately caused by the intentional and reckless acts of all defendants as described herein.

345. As a direct and proximate result of the deaths of the 9/11 Decedents, Plaintiffs have been deprived of future aid, assistance, services, comfort, and financial support.

346. As a direct and proximate result of the defendants’ cowardly, barbaric and

outrageous acts of murder, Plaintiffs will forever grieve the deaths of the 9/11 Decedents.

347. As a further result of intentional and reckless acts of the defendants, Plaintiffs have been caused to expend various sums to administer the estates of the 9/11 Decedents and have incurred other expenses for which they are entitled to recover.

348. As a result of the defendants' murderous conduct, the 9/11 Decedents suffered damages including pain and suffering, trauma, emotional distress, loss of life and life's pleasures, loss of earnings and earning capacity, loss of accretion to their estates and other items of damages as fully set forth in the paragraphs above which are incorporated herein by reference.

349. As a result of the intentional, reckless and negligent acts of the defendants as described above, the 9/11 Decedents were placed in apprehension of harmful and offensive bodily contact (assault), suffered offensive and harmful bodily contact (battery), suffered extreme fear, anxiety, emotional and psychological distress (intentional/negligent infliction of emotional distress), and were mentally and physically harmed, trapped, and falsely imprisoned (false imprisonment) prior to their deaths.

350. The actions of all defendants, acting in concert to carry out their unlawful objectives, were malicious, outrageous and in willful, wanton, and reckless disregard of the rights of the 9/11 Decedents and all Plaintiffs. The defendants, acting individually and jointly, intended to carry out actions that would end the lives of the Decedents.

351. As a result of their intentional, malicious, outrageous, willful and wanton conduct, all defendants are jointly and severally liable to all Plaintiffs for punitive damages.

**WHEREFORE,** Plaintiffs demand judgment in their favor against the Defendants, jointly, severally, and/or individually, in an amount in excess of One Billion Dollars (\$1,000,000,000) for compensatory and punitive damages, plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate.

## **COUNT TWO**

### ***CLAIM BY NON-U.S. NATIONAL PLAINTIFFS AGAINST ALL DEFENDANTS PURSUANT TO THE ALIEN TORT CLAIMS ACT***

352. Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

353. As set forth above, the defendants, jointly and severally, caused the deaths of each of the 9/11 Decedents through and by reason of acts of international terrorism. These terrorist activities constitute violations of the law of nations, including those international legal norms prohibiting torture, genocide, air piracy, terrorism and mass murder.

354. As a result of the defendants' violation of the law of nations, all Plaintiffs suffered damages as fully set forth in the paragraphs above.

355. Pursuant to 28 U.S.C. §1350, the estates, survivors and family members of the 9/11 Decedents who are not United States citizens are entitled to recover damages against defendants for wrongful death, survival, intentional infliction of emotional distress and solatium.

356. The injuries and damages suffered by Plaintiffs who are non-U.S. citizens by virtue of the death the Decedents, and the consequences resulting there from, were proximately caused by the intentional and reckless acts of all defendants as described

herein.

357. As a direct and proximate result of the defendants' cowardly, barbaric and outrageous acts of murder, Plaintiffs who are non-U.S. citizens have suffered damages as described above.

358. The actions of all defendants, acting in concert to carry out their unlawful objectives, were malicious, outrageous and in willful, wanton, and reckless disregard of the rights of all the Plaintiffs. The defendants, acting individually and jointly, intended to carry out actions that would end the lives of the Decedents.

359. As a result of their intentional, malicious, outrageous, willful and wanton conduct, all defendants are jointly and severally liable to all Plaintiffs for punitive damages.

### **DEMAND FOR JURY TRIAL**

360. Plaintiffs demand a trial by jury for all issues triable as of right by a jury.

**WHEREFORE**, Plaintiffs demand judgment in their favor against the Defendants, jointly, severally, and/or individually, in an amount in excess of One Billion Dollars (\$1,000,000,000) for compensatory and punitive damages, plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate.

Respectfully submitted,

/s/  
Timothy B. Fleming, Esq. (DC Bar No. 351114)  
WIGGINS CHILDS QUINN  
& PANTAZIS, PLLC  
1850 M Street, NW, Suite 720  
Washington, DC 20036  
(202) 467-4123

/s/

---

Thomas E. Mellon, Jr. (PA Bar No. 16767)  
Stephen A. Corr (PA Bar No. 65266)  
MELLON WEBSTER & SHELLY  
87 North Broad Street  
Doylestown, PA 18901  
(215) 348-7700

Walter S. Batty, Jr. (PA Bar No. 02530)  
c/o MELLON WEBSTER & SHELLY  
87 North Broad Street  
Doylestown, PA 18901  
(215) 348-7700

Dennis G. Pantazis (AL Bar No. ASB-2216-A59D)  
Melina Goldfarb (AL Bar No. ASB- 3739-R71M)  
WIGGINS CHILDS QUINN  
& PANTAZIS, LLC  
The Kress Building  
301 19th Street North  
Birmingham, AL 35203  
(205) 314-0500

Richard D. Hailey (IN Bar No. 7375-49)  
Mary Beth Ramey (IN Bar No. 5876-49)  
RAMEY & HAILEY  
9333 North Meridian Street, Suite 105  
Indianapolis, IN 46260  
(317) 582-0000

J.D. Lee (TN Bar No. 2030)  
David C. Lee (TN Bar No. 015217)  
LAW OFFICE OF J.D. LEE  
422 South Gay Street, 3<sup>rd</sup> Floor  
Knoxville, TN 37902  
(865) 544-0101

Evan J. Yegelwel (FL Bar No. 319554)  
TERRELL HOGAN ELLIS  
YEGELWEL. P.A.  
233 East Bay Street  
Blackstone Building, 8th Floor  
Jacksonville, FL 32202  
(904) 632-2424

Edward H. Rubenstone (PA Bar No. 16542)

LAMM RUBENSTONE LLC  
3600 Horizon Boulevard, Suite 200  
Trevose, PA 19053  
(215) 638-9330

Donald J. Winder (UT Bar No. 3519)  
Jerald V. Hale (UT Bar No. 8466)  
WINDER & COUNSEL, PC  
175 West 200 South, Suite 4000  
P.O. BOX 2668  
Salt Lake City, UT 84110-2668  
(801) 322-2222

Robert M. Foote (IL Bar No. 03124325)  
Craig S. Meilke (IL Bar No. 03127485)  
FOOTE, MEYERS, MIELKE  
& FLOWERS, LLC  
3 North Second Street, Suite 300  
St. Charles, IL 60174  
(630) 232-6333  
(630) 845-8982

*Attorneys for the Plaintiffs*