

1 his writing so far as it relates to Islam?

2 A. He believed it was necessary for the Islamic
3 community to take a vastly different track than it was
4 taking then. Himself and other Islamic modernists decided
5 the only way to move forward was to try stop trying to mimic
6 the west in culture and religion, avoid the secular
7 democracy that was emerging in Europe and the United States,
8 and, instead, pursue an Islamic path.

9 Now, ultimately speaking, in terms of policy,
10 what that would have amounted to, nobody really knows. But
11 his -- again, his idea was essential rejection of western
12 culture, rejection of western historical and political ideas
13 and creating a new political world in the Muslim world based
14 upon Islam instead of based upon democracy or based upon
15 communism.

16 Q. What's the form of Government in Bangladesh?

17 A. Bangladesh is currently, I believe, a
18 parliamentary system, but -- and one of the parties I
19 believe that's part of that parliament is Jamaat-e-Islami.

20 Q. What do you mean by "parliamentary"?

21 A. They are political parties, they compete for
22 seats, there is a prime minister.

23 Q. How many political parties are there in
24 Bangladesh?

25 A. Off the top of my head, I really couldn't tell

1 you.

2 Q. What's your best estimate?

3 A. I would say it's more than three or four, but I
4 couldn't tell you the total number.

5 Q. Do you know if it's considered a two-party system,
6 it being Bangladesh?

7 A. I don't believe it is a two-party system.

8 Q. Who is the current prime minister of Bangladesh?

9 A. I don't know.

10 Q. Who was the prime minister in 2003?

11 A. Don't know.

12 Q. Who is the current leader of JEI Bangladesh?

13 A. Don't know.

14 Q. Who was the leader of JEI in 2003?

15 A. In Bangladesh?

16 Q. In Bangladesh.

17 A. I am sorry, I don't know.

18 Q. Did JEI Bangladesh have a platform for its
19 political party in 2003?

20 A. When you say platform, a written platform?

21 Q. Yes.

22 A. I don't have a copy if they did.

23 Q. Have you ever seen it?

24 A. No.

25 Q. Have you ever been to Bangladesh?

1 A. No.

2 Q. Do you know an individual my the name of Meneeza
3 Hossain?

4 A. No.

5 Q. Do you know who role, if any, JEI Bangladesh has
6 in the current Bangladeshi Government?

7 A. I believe that they're a minority party involved
8 in parliament. I know they're active politically, in terms
9 of acquiring more seats, but I couldn't tell you more than
10 that.

11 Q. Are there geographic areas within Bangladesh that
12 are dominated by the JEI Bangladesh, politically?

13 A. Muslims. But, beyond that, I really couldn't tell
14 you.

15 Q. No, I said geographically.

16 A. No.

17 Q. A certain section of Bangladesh dominated by JEI
18 Bangladesh?

19 A. Not that I know of.

20 Q. What role, if any, does JEI Bangladesh have in the
21 current executive branch for the Bangladesh Government?

22 A. It's, I believe again, a minority involved in
23 parliament, but I don't know about that, the executive
24 powers.

25 Q. Does JEI have any role in the actual running of

1 the Bangladeshi Government?

2 A. Well, informally. But, formally, again, I don't
3 know.

4 Q. When you say "informally," what do you mean?

5 A. JEI Bangladesh is a fairly influential group, both
6 in Pakistan and Bangladesh, and it can bring political and
7 demographic power to bear upon politicians, in the sense it
8 is considered one of the major Islamic movements active in
9 Bangladesh. Again, when Pakistani Muslims want to mobilize
10 pressure on the Pakistani Government, they use
11 Jamaat-e-Islami Pakistan, in the same sense Jamaat-e-Islami
12 Bangladesh is a fairly major influence in Bangladesh, both
13 informally and, I believe, also formally in the Government.

14 Q. Are there any elected JEI Bangladesh officials in
15 the Bangladeshi Government?

16 A. I don't know.

17 Q. I am showing you an exhibit that I've marked as
18 Exhibit 3 for today's date, and just -- you can ignore the
19 handwriting on it, that's my handwriting. So you know, it
20 says "three whole punch in binder," but can you identify
21 what that one-page document is?

22 A. Yeah. It's my CV.

23 Q. Have you ever done any teaching at any university?

24 A. No.

25 Q. Under your description for experience, you write a

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1 category called major papers. Do you see that?

2 A. Yes.

3 Q. What does that mean, major papers?

4 A. Major papers would be major written materials that
5 I have been commissioned to create. You'll notice that my
6 honor thesis is on there from Georgetown University. Also
7 on there are other papers published by the foundation I work
8 for, The Nine Eleven Finding Answers Foundation, other
9 documents on there that have also been published by various
10 academic and scholarly organizations and journals. You'll
11 notice on there the Danish Institute for International
12 Studies, the Swedish National Defense College and also
13 Foreign Affairs.

14 Q. What does the phrase "major papers" mean?

15 A. Major papers -- I write mostly longer materials.
16 I used to publish shorter articles, and I no longer do that;
17 I mostly write longer scholarly pieces now. So, I wouldn't,
18 in this category, put newspaper articles or articles
19 published in simple magazines. These are more along the
20 lines of scholarly pieces.

21 Q. Do you have writings other than -- withdraw that.

22 Do you have writings that have been published
23 in the public domain, other than those that are identified
24 under the listing of major papers?

25 A. Yes.

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1 Q. And have you written any papers on the topic of
2 JEI Bangladesh?

3 A. No.

4 Q. At the bottom of your experience, it reads that
5 you're currently employed as an on-air terrorism analyst for
6 NBC News/MSNBC?

7 A. That's correct.

8 Q. When did you begin that?

9 A. I began working for them in October of 2004.

10 Q. Do you consider the on-air reports on MSNBC since
11 October 2004 by the MSNBC journalists to be authoritative?

12 A. No.

13 Q. And have you ever been interviewed on MSNBC or NBC
14 News on the topic of Bangladesh?

15 A. No.

16 Q. Have you ever been interviewed on MSNBC or NBC
17 News on the topic of JEI Bangladesh?

18 A. No.

19 Q. Why don't you describe for the record what the
20 globalterroralert.com website is?

21 A. Sure. In January of 2004, when I first started
22 working on my own as a consultant, I felt that there was a
23 lack of information websites that contained real open source
24 translations of raw documents from radical dissident groups
25 in the Middle East and Islamic world and terrorist groups in

1 the Middle East and Islamic world. And despite the plethora
2 of information out there, videos, communiques and whatnot, I
3 felt not enough was being put out there in a format and that
4 non-Arabic speakers and non-Urdu speakers could get access
5 to. So, I created this website as a means to distribute,
6 primarily, free, open-source translations of audio
7 recordings, video recordings and communiques to put out, by
8 extremist groups and terrorist groups, primarily in the
9 Muslim world and the Middle East.

10 Q. Do you own the globalterroralert.com website?

11 A. Yeah, that's my website.

12 Q. Are there any articles or writings on the website
13 authored by anyone other than you?

14 A. There may have been an article or two co-written
15 by, but, generally speaking, it's supposed to be --
16 actually, I should correct myself. Much of the material on
17 there, it has my name on it, but it's not been written by
18 me. These are simply flat translations of audio or video
19 recordings, so it's not something I've actually written,
20 other than typing it. It's a translation, a literal -- you
21 know, without comments about whatever document it's from.
22 So, there are certainly some documents on there that I've
23 written, but the majority of the material on there, again,
24 it's raw material, it's been done in such a way that it's
25 done for educational purposes.

1 Q. Your Exhibit Number 3, CV, states on it, under
2 globalterroralert.com, that, among other things, which is
3 the second bullet, I'll call it, that you research terrorist
4 fund-raising and recruitment networks. Do you see that?

5 A. That's correct.

6 Q. What does that mean?

7 A. In Europe, the United States and elsewhere, there
8 are extensive networks of individuals who provide key
9 resources to terrorist groups; namely, money, supplies and
10 recruits. One of the most important and understudied areas
11 of extremism and terrorism is the networks that support the
12 organizations themselves, the networks that provide money,
13 that provide supplies, that provide recruits. So, one of
14 the things I studied is how do people become members of
15 these groups, how do they get money to these groups, how do
16 they survive, what is their military strategy. But, again,
17 not at a theoretical level, but a very detailed level.

18 Q. And it says you use as sources -- withdraw that.

19 It says "using sources, including
20 declassified intelligence documents." What does that mean?

21 A. Sometimes, in court cases such as these, documents
22 will be released, or even original documents, regarding
23 raids that have taken place in various different countries,
24 regarding communication intercepts. Naturally, I am a bit
25 cautious when it comes to using anything that comes from a

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1 Government source, but if I feel that there's enough
2 information that something can be corroborated, especially
3 when, in many cases in court cases, where you actually have
4 the exhibits themselves, I will rely on them after being
5 careful to note where they're coming from, the information
6 is coming from.

7 Q. And then you identify, as another source,
8 "exhibits submitted in terror-related legal cases"?

9 A. That's correct.

10 Q. What does that mean?

11 A. Again, in a number of cases, both here in the
12 United States and abroad, there have been very important
13 documents, actual documents seized as evidence, original
14 documents, where it's not so much a question of recycled
15 information, but it's original seized receipts for terrorist
16 charities, letters between the heads of individuals of
17 different organizations, e-mails, stuff like that. And when
18 I -- when those are reliable and they provide a reliable
19 basis for getting information out of them, I use them.

20 Q. And then you also utilize Lexis-Nexis, correct?

21 A. That's another source I use, yes.

22 Q. Would you describe that for the record?

23 A. Sure, Lexis-Nexis is a word searchable or a
24 boolean searchable index of all newspaper, magazine
25 articles, federal registers, dozens upon dozens of other

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1 periodicals that are released on a daily basis. The index
2 is kept up to date by the day, and you can search back to, I
3 believe, 1976.

4 Q. And then you also utilized what you identify as
5 the World Wide Web, right?

6 A. That's correct.

7 Q. And you also utilize the Foreign Broadcast
8 Information Service, identified as FBIS, right?

9 A. That's correct.

10 Q. What's FBIS?

11 A. FBIS an a U.S. Government agency that was set up
12 to translate foreign news articles, and now, actually, it's
13 expanded to also translate communiques from militant groups
14 and videos from militant groups in an attempt to distribute
15 them to policy makers, academics and others who can -- who
16 have a use for regular translation of foreign material.

17 Q. And you state on your -- under your
18 globalterroralert.com information that you interviewed
19 alleged terrorist recruiters, do you see that?

20 A. Yeah, that's correct.

21 Q. What's an alleged terrorist recruiter?

22 A. Individuals that have either been designated by
23 the U.S. Government as a specially designated global
24 terrorism, SDGT, or individuals convicted in British court
25 providing material support or have served as recruiters for

1 terrorism. Additionally, I've also met with individuals who
2 have fled the United States and the United Kingdom in order
3 to avoid prosecution.

4 Q. How many alleged terrorist --

5 A. I am sorry. I meant to add one thing. I have
6 also interviewed at least two individuals who are
7 cooperating defendants in federal terrorism cases in the
8 U.S. at the request of the FBI.

9 Q. Just to be clear, I was only asking the first
10 clause, wasn't asking about cooperating defendants.

11 A. Sorry.

12 Q. I am asking what are alleged terrorist recruiters,
13 if you can confine your answer to that portion of the
14 question.

15 A. Would you like me to name some?

16 Q. Those that you've interviewed would be helpful.

17 A. Abuhamza Al-Masri, Omar Bakri Mohammed, Mohammed
18 Al-Massari, dr. Saad Al-Faqih. Anjem Choudary. You want me
19 to keep going?

20 Q. Yes.

21 A. I've also interviewed leaders of his Hisbuttahrir.
22 And I'm missing someone. Oh, I've also interviewed, or
23 spoken electronically anyway, with an individual that goes
24 by the nickname "Irhabi007." And I've also interviewed the
25 families of suicide bombers from Saudi Arabia and Kuwait.

1 Q. Are each of the people on the list, besides the
2 family of suicide bombers, put into the classification of
3 alleged terrorist recruiters?

4 A. Yeah, I believe so.

5 Q. And what is a terrorist solicitor?

6 A. I would say Hisbuttahrir. Hisbuttahrir, on its
7 face, appears to be a non-violent movement and possesses
8 nonviolence. However, members of Hisbuttahrir have been
9 arrested and have been accused of providing material support
10 to different terrorist groups, including in Egypt and, I
11 believe, also in the United Kingdom.

12 Q. What's the significance to you that members of
13 Hisbuttahrir have been arrested and associated with those
14 type acts in Egypt?

15 A. I think the significance is is that though perhaps
16 the organization does not put a priority on violence, in
17 fact, apparently shuns it, that the ideology of
18 Hisbuttahrir, which is fairly extreme, very anti-western,
19 fairly anti-Semitic, it pushes people down a road where,
20 eventually, the prescription against violence becomes lost.

21 Q. And the last group that you identify is
22 cooperating defendants in criminal cases?

23 A. That's correct.

24 Q. Are any of those on the list that you gave me
25 initially that began with Al-Masri?

1 MS. COOMBE: I am going to object to the
2 extent that the answer might call for any nonpublic
3 information.

4 Q. Let me ask it this way: Did you rely on any
5 cooperating defendants in any criminal cases as a basis for
6 the opinions that you formed and presented today?

7 A. No.

8 Q. Have you ever interviewed any members of JEI
9 Bangladesh?

10 A. No.

11 (Pause in proceedings.)

12 Q. Can you name any of the major political parties in
13 Bangladesh from year 2000 to the year 2004?

14 A. Other than Jamaat-e-Islami?

15 Q. Yes.

16 A. That's -- I'm not familiar off the top of my head.

17 Q. Have you ever heard of an organization known as
18 the Bangladesh National Party?

19 A. Vaguely.

20 Q. Do you know what it is?

21 A. I'm assuming it's a political party, but, again --
22 the name vaguely sounds familiar, but...

23 Q. Do you know what, if anything, it stands for
24 politically within Bangladesh?

25 A. Sorry, can't tell ya.

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1 Q. You can't tell me because you don't know?

2 A. I don't know off the top of my head.

3 Q. Okay. Do you consider jamaat.org a reliable
4 source of information about JEI Bangladesh?

5 A. I consider it a reliable source about Jamaat in
6 general. I think the Jamaat movement in Bangladesh is
7 closely related to the Jamaat in Pakistan. In fact, if I
8 remember, they have joint conferences together. They are
9 particular -- particularly when it comes to their philosophy
10 about the west and working with the west. I think they
11 follow, again, consistently, the ideals of Madudi. In terms
12 of policy prescriptions, there may be small differences
13 between Pakistan and Bangladesh, there certainly are
14 differences, generally speaking, with Pakistanis and
15 Bangladeshis, but, I think, generally speaking, the one
16 party mimics the other, in terms of its ideology.

17 Q. Do you consider the United States Embassy in
18 Bangladesh as authoritative on JEI?

19 A. Sure.

20 Q. Do you consider the United States Embassy in
21 Bangladesh authoritative on the relationship between the
22 United States and Bangladesh?

23 A. Sure.

24 Q. Now, you use a phrase in your report, which I can
25 give to ya, the second to last page, that the first