

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - : INDICTMENT

RAED NOMAN AL-ANBUKE, : S1 03 Cr. 807 (MBM)

a/k/a "Ra'id Al Anbuge," :

a/k/a "Raed Rokan," :

a/k/a "Raed Al-Anbaki," and :

WISAM NOMAN AL-ANBUKE, :

a/k/a "Wisam Al Anbuge," :

a/k/a "Wisam Noman Rokan," :

Defendants. :

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COUNT ONE

The Grand Jury charges:

1. From in or about January 2001, up to and including in or about March 2003, in the Southern District of New York and elsewhere, RAED NOMAN AL-ANBUKE, a/k/a "Ra'id Al Anbuge," a/k/a "Raed Rokan," a/k/a "Raed Al-Anbaki," and WISAM NOMAN AL-ANBUKE, a/k/a "Wisam Al Anbuge," a/k/a "Wisam Noman Rokan," the defendants, and others known and unknown, unlawfully, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Section 951 of Title 18, United States Code.

2. It was a part and an object of the conspiracy that RAED NOMAN AL-ANBUKE, a/k/a "Ra'id Al Anbuge," a/k/a "Raed Rokan," a/k/a "Raed Al-Anbaki," and WISAM NOMAN AL-ANBUKE, a/k/a "Wisam Al Anbuge," a/k/a "Wisam Noman Rokan," the defendants,

and others known and unknown, unlawfully, willfully and knowingly, would and did act in the United States as agents of a foreign government, specifically the Government of Iraq, without prior notification to the Attorney General, as required by law, in violation of Title 18, United States Code, Section 951.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about 2001, RAED NOMAN AL-ANBUKE, a/k/a "Ra'id Al Anbuge," a/k/a "Raed Rokan," a/k/a "Raed Al-Anbaki," met with an officer of the Iraqi Intelligence Service ("IIS") and provided the IIS officer with the location, employment, and family status of Iraqi expatriates in the United States.

b. In or about October or November 2001, WISAM NOMAN AL-ANBUKE, a/k/a "Wisam Al Anbuge," a/k/a "Wisam Noman Rokan," met with an IIS officer and provided the IIS officer with the location in the United States of an Iraqi expatriate, the son of a former Iraqi diplomat.

c. In or about October or November 2001, WISAM NOMAN AL-ANBUKE, a/k/a "Wisam Al Anbuge," a/k/a "Wisam Noman Rokan," met with an IIS officer and provided the IIS officer with the location and employment of an Iraqi expatriate in the United States.

d. In or about December 2001 or January 2002,

RAED NOMAN AL-ANBUKE, a/k/a "Ra'id Al Anbuge," a/k/a "Raed Rokan," a/k/a "Raed Al-Anbaki," facilitated a meeting between an officer of the IIS and the family of an Iraqi dissident now living in the United States.

(Title 18, United States Code, Section 371.)

COUNT TWO

The Grand Jury further charges:

4. From in or about January 2001, up to and including in or about March 2003, in the Southern District of New York and elsewhere, RAED NOMAN AL-ANBUKE, a/k/a "Ra'id Al Anbuge," a/k/a "Raed Rokan," a/k/a "Raed Al-Anbaki," the defendant, unlawfully and knowingly acted in the United States as an agent of a foreign government, specifically the Government of Iraq, without prior notification to the Attorney General, as required by law.

(Title 18, United States Code, Section 951.)

COUNT THREE

The Grand Jury further charges:

5. From in or about January 2001, up to and including in or about March 2003, in the Southern District of New York and elsewhere, WISAM NOMAN AL-ANBUKE, a/k/a "Wisam Al Anbuge," a/k/a "Wisam Noman Rokan," the defendant, unlawfully and knowingly acted in the United States as an agent of a foreign government, specifically the Government of Iraq, without prior notification to the Attorney General, as required by law.

(Title 18, United States Code, Section 951.)

COUNT FOUR

The Grand Jury further charges:

6. On or about November 28, 2001, in the Southern District of New York, WISAM NOMAN AL-ANBUKE, a/k/a "Wisam Al Anbuger," a/k/a "Wisam Noman Rokan," the defendant, in a matter within the jurisdiction of the Federal Bureau of Investigation, a department and agency of the executive branch of the Government of the United States, unlawfully, willfully, and knowingly falsified, concealed, and covered up by trick, scheme and device material facts, and made materially false, fictitious, and fraudulent statements and representations, to wit, WISAM AL-ANBUKE falsely informed agents of the Federal Bureau of Investigation that he had not told IIS officers of the location in the United States of an Iraqi expatriate, the son of a former Iraqi diplomat.

(Title 18, United States Code, Section 1001.)

COUNT FIVE

The Grand Jury further charges:

7. On or about February 25, 2002, in the Southern District of New York, WISAM NOMAN AL-ANBUKE, a/k/a "Wisam Al Anbuger," a/k/a "Wisam Noman Rokan," the defendant, in a matter within the jurisdiction of the Federal Bureau of Investigation, a department and agency of the executive branch of the Government of the United States, unlawfully, willfully, and knowingly falsified, concealed, and covered up by trick, scheme and device material facts, and made materially false, fictitious, and fraudulent statements and representations, to

wit, WISAM AL-ANBUKE falsely informed agents of the Federal Bureau of Investigation that he had not told IIS officers of the location in the United States of an Iraqi expatriate, the son of a former Iraqi diplomat.

(Title 18, United States Code, Section 1001.)

COUNT SIX

The Grand Jury further charges:

8. On or about November 28, 2001, in the Southern District of New York, WISAM NOMAN AL-ANBUKE, a/k/a "Wisam Al Anbuge," a/k/a "Wisam Noman Rokan," the defendant, in a matter within the jurisdiction of the Federal Bureau of Investigation, a department and agency of the executive branch of the Government of the United States, unlawfully, willfully, and knowingly falsified, concealed, and covered up by trick, scheme and device material facts, and made materially false, fictitious, and fraudulent statements and representations, to wit, WISAM AL-ANBUKE falsely informed agents of the Federal Bureau of Investigation that he had not told IIS officers of the location and employment of an Iraqi expatriate in the United States.

(Title 18, United States Code, Section 1001.)

COUNT SEVEN

The Grand Jury further charges:

9. On or about July 3, 2002, in the Southern District of New York, WISAM NOMAN AL-ANBUKE, a/k/a "Wisam Al Anbuge," a/k/a "Wisam Noman Rokan," the defendant, in a matter within the jurisdiction of the Federal Bureau of Investigation,

a department and agency of the executive branch of the Government of the United States, unlawfully, willfully, and knowingly falsified, concealed, and covered up by trick, scheme and device material facts, and made materially false, fictitious, and fraudulent statements and representations, to wit, WISAM AL-ANBUKE falsely informed agents of the Federal Bureau of Investigation that the IIS had developed a new methodology for training individuals to act in the United States as agents of the IIS.

(Title 18, United States Code, Section 1001.)

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FOREPERSON

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JAMES B. COMEY  
United States Attorney