IS FUQRA A "TERRORIST" ORGANIZATION.

The term terrorist is not defined in state or federal statutes. "Terrorism" is not an offense.

Terrorism is defined as the systematic use of terror, violence and intimidation to achieve an end.

With regard to the Colorado Fugra sect, we do know that:

- 1. We have memoranda and handwritten study materials indicating that members of the organization would be trained (and were trained) in the use of explosives, firearms, killing by stealth, use of knives as weapons and a number of other military combat skills.
- We have seized used combat shooting targets bearing the names and initials of members of the group and labels such as "zionist pigs", shiite dogs" as well as labels indicating anti-terrorist organizations such as "FBI Anti-terrorist Team" and "SAS" (British Army Anti-terrorist Force).
- 3. Approximately forty pounds of improvised explosive devices from simple fused devises to sophisticated remote detonated devices were seized from a storage locker used by the group.
- 4. Approximately thirty firearms were located in a hidden cave on the Trout Creek property. Nearly all of these were military weapons or commercial copies of military weapons including some AK-47 assault rifles with nearly nine thousand rounds of AK-47 ammunition.
- 5. We have notes and memoranda indicating infrastructure surveys of such things as electric power grids, power substations and military installations, all of which were found at known Fugra storage locations.
- 6. We have a packet of surveillance notes and photos of the Denver Hare Krishna Temple as well as several drafts of a written report of the firebombing of that facility. The description of the firebombing in this report matches exactly the evidence of arson by explosive found by the Denver Fire Department at the Hare Krishna Temple on August 1, 1984.
- 7. We have another packet of notes, photos and maps concerning the Tucson, Arizona Muslim Mosque as well as a detailed written plan for the murder of Rashad Khalifa, the leader of that congregation. On January 31, 1990, Khalifa was murdered in a manner strikingly similar to that described in this plan.

¹ Terrorist training activities are prohibited by Colorado statute, <u>see</u> §18-9-120 C.R.S.

8. The handwriting and finger prints of several of the defendants in our case were found on the documents described above.

It would seem there is even reason to believe that Fuqra's activities are systematic, violent and intimidating and that they were done to achieve political/religious ends i.e., to silence those whose views are different than their own.