

# **EXHIBIT B**

**SEALED**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**Holding a Criminal Term**

**Grand Jury Sworn in on November 15, 2007**

**UNITED STATES OF AMERICA**

**v.**

**PAUL ALVIN SLOUGH,**

**NICHOLAS ABRAM SLATTEN,**

**EVAN SHAWN LIBERTY,**

**DUSTIN LAURENT HEARD,**

**DONALD WAYNE BALL,**

**Defendants.**

**URBINA, J. RMU**

**B**

**CRIMINAL NO.**

**CR - 08 - 360**

**GRAND JURY ORIGINAL**

**VIOLATIONS:**

**18 U.S.C. §§ 3261(a)(1); 1112  
(Voluntary Manslaughter) (Counts  
One through Fourteen)**

**18 U.S.C. §§ 3261(a)(1); 1113  
(Attempt to Commit  
Manslaughter) (Counts Fifteen  
through Thirty-Four)**

**18 U.S.C. §§ 3261(a)(1); 924(c)  
(Using and Discharging a Firearm  
During and in Relation to a Crime  
of Violence) (Count Thirty-Five)**

**18 U.S.C. § 2  
(Aiding and Abetting and Causing  
an Act to be Done)**

**INDICTMENT**

**DEC 04 2008**

The Grand Jury charges that:

**COUNTS ONE THROUGH FOURTEEN  
(Voluntary Manslaughter)**

At all times relevant to this Indictment:

1. On or about September 16, 2007, defendants PAUL ALVIN SLOUGH, NICHOLAS

ABRAM SLATTEN, EVAN SHAWN LIBERTY, DUSTIN LAURENT HEARD, and DONALD WAYNE BALL, were employed by the Armed Forces outside the United States, as defined in 18 U.S.C. § 3267(1), that is:

- a. The defendants were employees and subcontractors of Blackwater Worldwide, a company contracting with the United States Department of State, who were employed to provide personal security services in the Republic of Iraq, which employment related to supporting the mission of the United States Department of Defense in the Republic of Iraq.
- b. The defendants were present and residing outside the United States in connection with their employment with Blackwater Worldwide.
- c. The defendants were not nationals of nor ordinarily residents in the Republic of Iraq.
2. The conduct alleged in this Indictment occurred in and around the Nisur Square traffic circle in the city of Baghdad, in the Republic of Iraq.
3. The conduct alleged in this Indictment constitutes offenses each of which would be punishable by imprisonment for more than one year if the conduct had been engaged in within the special maritime and territorial jurisdiction of the United States.
4. The conduct alleged in this Indictment occurred outside of the jurisdiction of any particular State or district and within the venue of the United States District Court for the District of Columbia, as provided by 18 U.S.C. § 3238.
5. On or about September 16, 2007, in the city of Baghdad, in the Republic of Iraq, defendants PAUL ALVIN SLOUGH, NICHOLAS ABRAM SLATTEN, EVAN SHAWN LIBERTY, DUSTIN LAURENT HEARD, DONALD WAYNE BALL, and another joint offender

known to the Grand Jury, unlawfully and intentionally, upon a sudden quarrel and heat of passion, did commit voluntary manslaughter, as defined by 18 U.S.C. § 1112, by killing the following individuals:

- COUNT ONE:** Ahmed Haithem Ahmed Al Rubia'y
- COUNT TWO:** Mahassin Mohssen Kadhum Al-Khazali
- COUNT THREE:** Osama Fadhil Abbas
- COUNT FOUR:** Ali Mohammed Hafedh Abdul Razzaq
- COUNT FIVE:** Mohamed Abbas Mahmoud
- COUNT SIX:** Qasim Mohamed Abbas Mahmoud
- COUNT SEVEN:** Sa'adi Ali Abbas Alkarkh
- COUNT EIGHT:** Mushtaq Karim Abd Al-Razzaq
- COUNT NINE:** Ghaniyah Hassan Ali
- COUNT TEN:** Ibrahim Abid Ayash
- COUNT ELEVEN:** Hamoud Sa'eed Abttan
- COUNT TWELVE:** Uday Ismail Ibrahiem
- COUNT THIRTEEN:** Mahdi Sahib Nasir
- COUNT FOURTEEN:** Ali Khalil Abdul Hussein

(**Voluntary Manslaughter and Aiding and Abetting and Causing an Act to be Done**, in violation of Title 18, United States Code, Sections 3261(a)(1), 1112 and 2.)

**COUNTS FIFTEEN THROUGH THIRTY-FOUR**  
**(Attempt to Commit Manslaughter)**

6. The Grand Jury realleges and incorporates by reference as if fully stated herein

paragraphs 1 through 4 of Counts One through Fourteen of this Indictment.

7. On or about September 16, 2007, in the city of Baghdad, in the Republic of Iraq, defendants PAUL ALVIN SLOUGH, NICHOLAS ABRAM SLATTEN, EVAN SHAWN LIBERTY, DUSTIN LAURENT HEARD, DONALD WAYNE BALL, and another joint offender known to the Grand Jury, unlawfully and intentionally, upon a sudden quarrel and heat of passion, did attempt to commit manslaughter attempting to kill the following individuals, who were wounded as a result therefrom:

<b>COUNT FIFTEEN:</b>	Majed Salman Abdel Kareem Al-Gharbawi
<b>COUNT SIXTEEN:</b>	Jennan Hafidh Abid al-Razzaq
<b>COUNT SEVENTEEN:</b>	Yasmin Abdul Kidr Salhe
<b>COUNT EIGHTEEN:</b>	Mohanad Wadhnah
<b>COUNT NINETEEN:</b>	Haydar Ahmad Rabie Hussain Al-Khafaji
<b>COUNT TWENTY:</b>	Hassan Jaber Salman
<b>COUNT TWENTY-ONE:</b>	Farid Walid Hasoun Al-Kasab
<b>COUNT TWENTY-TWO:</b>	Abdul Amir Raheem Jihan Yasser
<b>COUNT TWENTY-THREE:</b>	Wisam Raheem Fliah Hasan Al-Miri
<b>COUNT TWENTY-FOUR:</b>	Talib Mutluk Diwan
<b>COUNT TWENTY-FIVE:</b>	Adel Jaber Sham'ma Al-Jadiri
<b>COUNT TWENTY-SIX:</b>	Nasir Hamzah Latif Al-Rikabi
<b>COUNT TWENTY-SEVEN:</b>	Mahdi Abid Khider Abbas Al-Faraji
<b>COUNT TWENTY-EIGHT:</b>	Abdul Wahab Abdul Qadar Al-Qalamchi
<b>COUNT TWENTY-NINE:</b>	Bara Sadoon Ismail Al-Ani

**COUNT THIRTY:** Sami Hawa Hamud Al-Sabahin  
**COUNT THIRTY-ONE:** Fawziyyah Aliwi Hassoon  
**COUNT THIRTY-TWO:** Ali Hadi Naji Al-Rubaie  
**COUNT THIRTY-THREE:** Alah Majeed Sghair Zaidi  
**COUNT THIRTY-FOUR:** Jassim Mohammad Hashim

**(Attempt to Commit Manslaughter and Aiding and Abetting and Causing an Act to be Done,**  
in violation of Title 18, United States Code, Sections 3261(a)(1), 1113 and 2.)

**COUNT THIRTY-FIVE**  
**(Using and Discharging a Firearm During and**  
**In Relation to a Crime of Violence)**

8. The Grand Jury realleges and incorporates by reference as if fully stated herein paragraphs 1 through 4 of Counts One through Fourteen of this Indictment.

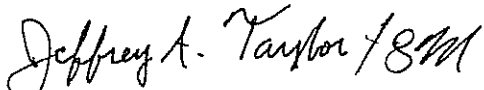
9. On or about September 16, 2007, in the city of Baghdad, in the Republic of Iraq, defendants PAUL ALVIN SLOUGH, NICHOLAS ABRAM SLATTEN, EVAN SHAWN LIBERTY, DUSTIN LAURENT HEARD, and DONALD WAYNE BALL, and another joint offender known to the Grand Jury, knowingly used and discharged firearms, that is, an SR-25 sniper rifle; machine guns (M-4 assault rifles and M-240 machine guns); and destructive devices (M-203 grenade launchers and grenades), during and in relation to a crime of violence for which each of them may be prosecuted in a court of the United States, that is, in connection with the crime of voluntary manslaughter, as alleged in Counts One through Fourteen of this Indictment, and the crime

of attempt to commit manslaughter, as alleged in Counts Fifteen through Thirty-Four of this Indictment.

**(Using and Discharging a Firearm During and in Relation to a Crime of Violence and Aiding and Abetting and Causing an Act to be Done, in violation of Title 18, United States Code, Sections 3261(a)(1), 924(c) and 2.)**

A TRUE BILL:

FOREPERSON

  
Attorney of the United States in  
and for the District of Columbia