

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA )  
 )  
 v. ) Criminal No. 01-455-A  
 )  
 ZACARIAS MOUSSAOUI, )  
 )  
 Defendant. )

**DEFENDANT'S NOTICE OF NON-MENTAL HEALTH  
SUMMARY AND EXPERT WITNESSES**

The defendant, by counsel, hereby gives notice that he may call the following persons as expert witnesses at the trial of this case:

1. **Farhad Khosrokhavar**: Mr. Khosrokhavar is a sociologist at the Ecole des Hautes Etudes en Sciences Sociales, in Paris. He will testify concerning the social circumstances of second generation immigrants in France of North African heritage. He will testify that the defendant's experience is typical of such persons - that they suffer significant racism and discrimination, that they have no roots in their parents' country of origin, because the parents attempt to assimilate into French society, but, typically, are never fully accepted in France either. The second generation grows up with no real connection to their Muslim faith because their parents choose to raise them in the secular French tradition, and so they have no religious roots. As they grow older and continue to suffer alienation from French society, they turn to Islam but have no context for evaluating the various strains of Islam with which they are confronted. They are, therefore, vulnerable to the overtures of fundamentalist and radical Islamist movements.

He will testify that Moussaoui's life story is consistent with this phenomenon. As a result, when Moussaoui went to London he effectively severed his ties to the only anchors he had

in his life, although those too were problematic. As his personal and financial circumstances deteriorated in a country where he did not speak the language, he initially sought identity with a moderate Mosque, but was subsequently exposed to the propaganda and enticements of the radical Mosques which flourished in London in the 1990s.

He will testify as to various aspects of his book “Suicide Bombers, Allah’s New Martyrs” that relate to these topics.

2. **Dominique Thomas**: Mr. Thomas is a diplomate of L’Institut national des langue et des civilisations orientales and the L’Institut d’etudes politiques, in Paris. He will testify about radical Islam in London and recruitment by al Qaeda and other radical jihadist organizations that took place in and around the London mosques. He will describe the recruitment process, including the presentation of videotapes and CDs that were used for recruitment purposes. This process used graphic images of the abuse of Muslim men, women and children by Western entities. Through this material and his testimony, he will demonstrate that Moussaoui, like other alienated young Muslims in London, including young men who had suffered discrimination and disaffection in France, was subjected to a calculated campaign designed to motivate him to join the jihad, while at the same time he was provided with psychological and physical support, such as housing and food.

4. **Erik Rigler**: Mr. Rigler is a certified pilot and former F.B.I. agent, with expertise in aircraft accident investigation and aviation security. He will testify as to aviation security matters, including, but not limited to, the factual information contained or described in the 9/11 Commission classified publication known as Staff Monograph No. 3. Mr. Rigler also may testify to the factual information contained in or described in Chapter 5 of the classified FBI OIG

Report, and/or the CIA Report on Accountability, dealing with Khalid al-Mihdahr and Nawaf al-Hazmi, two 9/11 hijackers whose pre-9/11 presence was known to the government. The defense is awaiting approval from the government for Mr. Rigler to enable him to review classified information. Mr. Rigler also may summarize many of the CIPA designated documents pertaining to the above two matters.

5. Steve Tabackman: Mr. Tabackman is an attorney. He will testify as a summary witness as to the activities of the 19 hijackers in the United States in relation to Moussaoui's activities. He will also testify as to the organizational structure of the various government agencies involved in the 9/11 investigation.

ZACARIAS MOUSSAOUI

By           /S/            
Counsel

Gerald T. Zerkin  
Senior Assistant Federal Public Defender  
Kenneth P. Troccoli  
Anne M. Chapman  
Assistant Federal Public Defenders  
Eastern District of Virginia  
1650 King Street, Suite 500  
Alexandria, VA 22314  
(703) 600-0800

Edward B. MacMahon, Jr., Esq.  
107 East Washington Street  
P.O. Box 903  
Middleburg, VA 20117  
(540) 687-3902

Alan H. Yamamoto, Esq.  
643 South Washington Street  
Alexandria, VA 22314  
(703) 684-4700

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 24th day of January, 2006, a true copy of the foregoing Notice was served upon AUSA Robert A. Spencer, AUSA David J. Novak and AUSA David Raskin, by hand at the U.S. Attorney's Office, Alexandria, VA by delivering it to them by hand.

/S/

Gerald T. Zerkin