



1 KIRELL TAYLOR CDC NO. T-35161
2 P.O. BOX 5103
3 DELANO, CA 93216-5103
4 KERN VALLEY STATE PRISON

5
6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE EASTERN DISTRICT OF VIRGINIA
8
9 ALEXANDRIA DIVISION

10	ZACARIAS MOUSSAOUI,)	
	Defendant,)	FED. RULES OF CIVIL PRO. 60(b)
11	KIRELL TAYLOR,)	FED. RULES OF CIVIL PRO. 12(b)(5)
	DEBTOR,)	FED. RULES OF CIVIL PRO. 37(g)
12	Third Party Intervener,)	
	Plaintiff,)	MOTION FOR INTERLOCUTORY ORDER
13	-VS-)	AND COMPULSORY COUNTERCLAIMS PER
	UNITED STATES OF AMERICA,)	FED. RULES OF CIVIL PRO. 13(a)(b).
14	Respondent.)	MOTION PURSUANT TO RULES OF
)	EVIDENCE 401 AND 410; RELEVANCY.
15)	DATED: March 27, 2006

16
17 THIRD PARTY INTERVENER, KIRELL FRANCIS TAYLOR, MOVES HONORABLE LEONIE BRINKEMA,
18 TO ORDER THE U.S. MARSHALS AT THE STATES EXPENSE TO SUMMONS HIM BEFORE THE
19 BENCH IN ORDER TO EXPLAIN WHY THE DEFENDANT, ZACARIAS MOUSSAOUI, endeavored
20 to enter a GUILTY plea in July of 2002, and why he ultimately plead GUILTY
21 on April 22, 2005, in the death penalty phase now before the trial Court.

22 STATEMENT OF FACTS:

23 In April of 1997, I, KIRELL FRANCIS TAYLOR, Third Party Intervener met
24 the founder of al-Qaida, OSAMA BIN LADEN, in Afghanistan.
25 On May 2, 1997, upon returning to the UNITED STATES, Third Party Intervener
26 was gun down in the streets of Los Angeles County and incurred a parole
27 violation as a result therefrom on May 22, 1997.

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1 While in custody Third Party Intervener founded a staunch ANTI-TERROR cell
2 entitled the KIRELLIAN COALITION FOUNDATION.

3 On July 11, 1998, Third Party Intervener paroled from Donovan State Prison.

4 Around July/August 1998, Third Party Intervener met MOHAMMED ATTA, in
5 GERMANY.

6 Around November of 1998, Third Party Intervener inducted the Defendant,
7 ZACARIAS MOUSSAOUI, into the Third Party Intervener's anti-terror cell at Uman
8 OMAR'S Mosque in LONDON, UK. Whence Third Party Intervener and the Defendant
9 diligently collaborated to forestall and prevent any terrorist attacks within
10 the UNITED STATES and abroad.

11 On August 16, 1999, Third Party Intervener was interviewed by Detective
12 BUDDY and WEST from West Valley, Los Angeles Police Division. During this
13 interview Third Party Intervener asked the detectives was the inquisition in
14 relationship to Third Party Intervener's semi association with the 1992 U.S.
15 Embassy bombings in Kenya, Africa? They said, "No!"

16 On August 27, 1999, Third Party Intervener was arrested for the kidnap
17 and murder of a multimillionaire business man name CHRISTOPHER RAWLINGS. The
18 reenactment of this case was aired on AMERICA'S MOST WANTED several times.

19 (Case No. LA933959, VAN NUYS SUPERIOR COURT)
20

21 RESPECTFULLY SUBMITTED.

22 /S/ Kirell Francis Taylor
KIRELL FRANCIS TAYLOR T-35161
23 P.O. BOX 5103
DELANO, CA 93216-5103
24 KERN VALLEY STATE PRISON
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26
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DATED: March 27, 2006

1 A. Factual Background

2 On June 14,2001, Petitioner's request to wear a kufi, a Muslim religious
3 hat, inside of jail and court hallways was denied, except that the trial court
4 allowed Petitioner to wear it in court and during trial, provided that it
5 was brought to court in advance to the sheriff and subject to search. (CT
6 at 354-55; see RT at W21-W23; see also CT at 220-21,259.)

7 In sum, On June 19,2001, petitioner wrote a letter to his former judge
8 Hon Rosenblatt, however, he sent it to a retired Magistrate whom he knew of
9 to in-turn mail the letter to Hon. Rosenblatt. The contents of a portion of
10 the letter stated, "Don't be surprised when I drag Osama Bin Laden in your
11 courtroom. Don't hold me for kidnapping. Because I want five million. Do what
12 you will! My silence holds much volume and this is my final epistle". (See
13 Exhibit "A") On June 27,2001, the retired Magistrate, Hon. Riechmann wrote
14 petitioner back and said, "There is no point in sending a letter that will
15 not advance your cause but may end up hurting it". (See Exhibit "B") Hence,
16 petitioner sent his carbon copy of the letter to Hon. Rosenblatt anyway and
17 Hon. Riechmann kept the original letter.

18 Then in August of 2001, petitioner wrote Hon. Riechmann a letter back
19 which stated, "Never mind my cause. How about me trying to adhere to the cause
20 of trying to prevent an approaching terrorist attack on our soil". Albeit,
21 on Sept. 4, 2001, in reference to the 'Bin Laden letter', Hon. Rosenblatt,
22 stated, "I just want you to understand that I have stopped -- you know, once
23 I open it and I see its a letter from you. I'm not reading letters from you
24 anymore. I told you they will be in the court file. I told you please, no
25 ex parte communications". (RT Unknown)

26 To that end, on Sept. 6,2001, petitioner began picking a jury and the
27 majority of the jurors saw petitioner dressed in his customary Islamic garbs.
28 Then when petitioner arrived back at the jail he made a phone call and learned
29 that the terrorist attacks were scheduled for september 11th. And on Sept.
30 7, 2001, while continuing to pick a jury petitioner asked a juror paraphrasing,
31 "how would you feel about seeing Islamic and muslim terrorism in the media
32 and Newspaper?" (RT Not Provided) Then petitioner utilized a peremptory
33 challenge to subtly kick the juror off the panel. And on Sept. 8, 2001,
34 petitioner phoned the Los Angeles FBI about terrorist plans he had in his
35 possession. The FBI never showed up at the LA County Jail, and on Sept. 10,
36 2001, at the LA County jail, petitioner told his private investigator Lawrence
37 Sanchez (626) 280-8127 that something big was going to happen. Needless to
38 say, on Sept. 11th, the terrorist attacks petitioner was trying to prevent
39 occurred in his face. Thusly on Sept. 12th,2001, after the jurors and alternate
40 jurors had been sworn (RT at 212,214), the following exchange occurred outside
41 the presence of the jury:

42 [Mr. Taylor]: I'm going to open the jury up and talk about and question them
43 -- voir dire them again about the incident that happened yesterday based on
44 me being muslim.

1 The court: I'm going to take care of that.

2 [Mr. Taylor]: If they have a problem with it and they are prejudiced, I'm
3 kicking them off the panel.

4 The court: I'm going to take care of that, okay? That's my job...(RT at 230-
5 31.)

6 Later that same day, the trial judge stated to the jury,
7 "Okay, good afternoon, welcome back. Ladies and gentlemen as we all know,
8 something horrible happen yesterday, and the real question I have for
9 you is anybody going to let that interfere with giving both sides a fair
0 trial in this case?" (RT at 233.)

1 The jurors answered in the negative. (RT at 233.) Then on Sept. 13, 2001,
2 the following took place outside the presence of the jury:

3 [Mr. Taylor]: I'm going to take the initial stance to tell you, your honor,
4 what I told the people of the jury panel last week. 'If any terrorism was
5 in the paper, I'm not saying that that would occur', that they read in the
6 paper, would they be biased to that and etcetera? They told me "No". I had
7 the will power within my invested knowledge to tell them if it was to occur
8 this following week. I tried to give you judges in this judicial system of
9 Los Angeles County many innuendos about who I am, what I represent, what I
0 stand for. (Bin Laden letter) I'm going to take the full initiative to say
1 based on me not being free and liberated the other day when you ruled on my
2 case is the reason for these bombs that's going off, is the reason why people
3 is in dismay right now, in disgust, because of your ruling on my anatomy.
4 I have not killed Christopher Rawlings, but I do take the complicity of however
5 many deaths that's occurred. You can ask Detective Purdy when he first came
6 to interview me when I thought I was going to be told on, and informed on
7 about the United States Embassy bombing in Kenya. Ask him did I speak about
8 my beloved friend Osama Bin Laden. (Sarcasm) Of course I did. Five months
9 ago I was upset behind a policy that he, Osama Bin Laden implemented and I've
0 expressed it to one of my Bauliff's as well and he asked me did I have personal
1 contact. Of course I do. You need to call Hon. Riechmann at 310-277-5139 and
2 ask him about [a letter] (Follow-up letter) that I've written him (in August)
3 a month and a half ago in regards to what took place two days ago.

4 The court: Okay.

5 [Mr. Taylor]: He has the letter if you want to know about it. You need to
6 forward that to the federal authorities.

7 The court: I'm sure that somebody will look into that.

8 Later that same day the following occurred outside the presence of the
9 jury:

0 [Mr. Taylor]: I would like to ask for a mistrial based on the overlapping
1 circumstances in this case, the way I'm dress -- I think pretty much I'm biased
2 by now, I mean my attire has exemplified that. No juror would like to look
3 at me in my eyes during cross-examination, so you know two days after the

1 incident, as tragic as it was, I don't think I'm going to get a fair trial.
(RT at 363; see CT at 549)

2
3 **The court:** Well, if you remember, I asked all the jurors before we started
4 and they said they could be fair notwithstanding the horrible things that
5 happened Tuesday. Nobody knows, at least I don't know, who caused the atrocities
6 that happened in New York and Washington.

7 **(Mr. Taylor):** That could have been prevented by your leave.

8 **The court:** Well, that's what you say. So you made your motion and I'm going
9 to deny it and we're going to continue.

10 **(Mr. Taylor):** Would you like me to give you another date and time for another
11 atrocity on the record?

12 **The court:** You can put on the record whatever you want.

13 **(Mr. Taylor):** We can go side bar if you want, me and you and the D.A..

14 **The court:** This is as private as its going to get. But the jury is coming in
15 now, so did you want to say something?

16 **(Mr. Taylor):** No, I don't want to say nothing else. (RT at 363-365.)

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1 B. AFTER THIRD PARTY INTERVENER'S CRIMINAL CONVICTION

2 1. On January 13, 2002, Third Party Intervener, served a Petition For
3 Inquisition and/or Manifesto outlining his attempt to prevent the 9/11 attacks
4 on the U.S. Military, including but not limited to, the FBI in WASHINGTON D.C.,
5 the CIA, White House and the Commission on Judicial Performance.

6 2. On May 20, 2002, the Commission on Judicial Performance was the only
7 agency to give an inapt investigative response. (See Exhibit "C").

8 3. On June 6, 2002, Third Party Intervener, filed a lawsuit on behalf
9 of the 9/11 victims. This suit was lodged in the U.S. District Court, Central
10 District of California (Western Division-Los Angeles). Case NO. 02-CV-5071.
11 KIRELL F. TAYLOR V. USA, et al.

12 4. On July 17, 2002, Third Party Intervener, finally had the opportunity
13 to write an AFFIDAVIT conveying to the Real Party In Interest, including the
14 world at large, that he secretly instructed the Defendant, ZACARIAS MOUSSAOUI,
15 to enter into a guilty plea. The affidavit was witnessed, signed and sealed
16 in an envelope. The envelope was then immediately placed in the U.S. mail and
17 remains sealed in a Safety Deposit Box with the post mark properly affixed
18 to it to date.

19 5. On July 26, 2002, the Central District Court wherein the law suit was
20 filed mentioned above, received Supplemental Attachments to the suit which
21 was a letter to the Commander-in-Chief, George Bush, that explained that the
22 Third Party Intervener had instructed ZACARIAS MOUSSAOUI to plead GUILTY. (See
23 Exhibit "D," reduplication of President Bush's letter & Court Docket).

24 C. PRIVATE INVESTIGATOR, MARRY HADLEY

25 6. On August 2, 2002, Third Party Intervener, received a letter from his
26 ex private investigator, Marry Hadley. Her letter reflects in relevant part,
27 "To set the record straight: I received your manifesto with articles enclosed

1 with a note asking me to make a copy of it and return it to you. I did that...
2 In reference to your request that I "reach out" to Moussaoui: I have no interest
3 in doing that. Further, as you should know, that case was being handled by
4 State appointed counsel and they have their own investigator. I also do not
5 solicit business. Lastly, I decide whom I work for, not you. You must stop
6 directing your delusions of mass conspiracy towards me. I do not want to have
7 anything to do with you or your plans. If you believe you have information
8 about terrorist attacks then tell the FBI, not me!!!" August 2, 2002. (See
9 Exhibit "E".)

10 7. Third Party Intervener, endeavored to recruit Ms. Hadley to assist
11 him with preventing an impending terrorist attack in East Africa. Yet Ms. Hadley
12 did not want anything to do with his plans after the neglect of the FBI.

13 D. CONFISCATION OF OUTGOING MAIL

14 8. On September 30, 2002, Third Party Intervener, wrote a CONFIDENTIALITY
15 AGREEMENT to be studied by a renowned bank in order to borrow \$10 million
16 dollars to pay off an al-Qaida defector. The letter was sealed in the face
17 of a correctional officer. The letter was in route to SAIMA HUSSAIN in
18 Manchester, England UK. The contract disclosed the following in relevant part,
19 "The records and seals of significant matters shall be subject to perusal for
20 consideration whether or not such loan may be respectively honored to allocate
21 the money as follows: (I) To purchase all technical equipment, i.e. computers,
22 surveillance monitors, video recorders, cell phones, satellite phones; (II)
23 To seize any and all ill gotten liquid assets in the possession of Li Kubwa
24 Veta's criminal organization/plotters of terror attacks; (III) To the traveling
25 fellowship of KCF constituency...The elite constituency of KCF must remain
26 anonymous for the purpose of successfully moving by stealth for the greater
27 good of humanity, by virtue of gathering intelligence against a terrorist

1 network operating abroad in Africa." The contents of the envelope was
2 confiscated by prison officials. A portion of Saima's letter disclosed in
3 relevant part, "My residual-power still and will forever be in order properly
4 as long as I'm able to be around other inmates and get mail in their names
5 and send mail in their names to the underlying constituency of the KIRELLIAN
6 COALITION FOUNDATION." September 30, 2002.

7 9. On November 10, 2002, Third Party Intervener, was found guilty of
8 abusing confidential mail procedures. (See Exhibit "F").

9 10. Nevertheless, this time without the assistance of the Defendant,
10 ZACARIAS MOUSSAOUI, Third Party Intervener, failed to prevent the terrorist
11 attack in Africa at PARADISE HOTEL, in Mombasa, Kenya, on November 28, 2002.

12 11. However, by Correctional Officer LOPEZ, opening up the envelope that
13 was sealed in his presence...only reinforced the KIRELLIAN COALITION
14 FOUNDATION'S position with respect to infiltrating terror cells around the
15 global community.

16 On May 21, 2003, via certified return receipt mail, Third Party Intervener,
17 wrote Attorney General, DAVID SCHAPIRO, and inform him that he had viable
18 information regarding the case of UNITED STATES V. ZACARIAS MOUSSAOUI. Mr.
19 Schapiro never responded. See Exhibit "G".

20 CONCLUSION

21 On September 26, 2003, Third Party Intervener, filed a TRAVERSE to a Return
22 to his First Amended Petition For Writ of Habeas Corpus with a biography on
23 the life of him entitled BROKEN SILENCE TO 9/11 attached as an exhibit thereto.
24 (U.S. District Court-CENTRAL DISTRICT OF CALIFORNIA LOS ANGELES, Case No.
25 2:03-cv05540). A Certificate of Appealability with the foregoing information
26 in part, was filed in the Ninth Circuit Court of Appeal and denied. Case No.
27 04-55930.

1 WHEREFORE, Third Party Intervener, insisted that the Defendant, ZACARIAS
2 MOUSSAOUI, plead guilty in order to firmly establish his nexus with the
3 KIRELLIAN COALITION FOUNDATION in light of the Government withholding
4 exculpatory evidence in violation of Brady v. Maryland.

5 On April 22, 2005, the Defendant plead guilty, and this Court is put on
6 NOTICE that in the furtherance of justice it is absolutely indispensable that
7 the Court strikes the Government's claim, cause, indictment or case for failure
8 to state a claim upon which relief can be granted for the following reason:

9 1. The U.S. Government is prosecuting an Islamic agent-provocateur who
10 has set throughout the proceedings impersonating himself to be an OSAMA BIN
11 LADEN loyalist and/or terrorist. Yet, the sealed envelope in the possession
12 of Third Party Intervener is incontrovertible evidence that the Defendant has
13 been followings orders given by the Third Party Intervener, including receiving
14 flying instructions on the order of him. Hence if this Court is not incline
15 to believe the foregoing information: why else would the Defendant fold his
16 deck and plead guilty on April 22, 2005?

17
18 I DECLARE UNDER THE PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES
19 OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

20
21 Respectfully Submitted,

22 /S/

23 KIRELL FRANCIS TAYLOR T-35161
Third Party Intervener