

DECLARATION OF MICHAEL FILIPOVIC

I, Michael Filipovic, hereby affirm that the following is true to the best of my information and belief.

1. I am an attorney licensed to practice law in the State of Washington and for the United States District Court for the Western District of Washington.

2. I am one of the attorneys assigned to represent Mr. Ahmed Ressam.

3. On February 19, 2003, I spoke with FBI Special Agent Greg Carl to get details on the significance of Mr. Ressam's information as it related to the Richard Reid shoe-bomb case. Agent Carl was the FBI's primary explosives expert in the Ressam case, and he testified in Los Angeles.

4. Mr. Ressam had been debriefed on May 23, 2001, by Special Agent Carl and others from the FBI Crime Lab team prior to the Richard Reid arrest. I asked Mr. Carl about the significance of Mr. Ressam's debriefing information as it related to the Reid case.

5. Mr. Carl stated that during his debriefing of Mr. Ressam, Ressam had described a technique that had been taught in the Afghanistan camps where one could create a paper detonator for an explosive device. This type of detonator did not require metal.

6. On December 22, 2001, Richard Reid was on an international flight from Paris to Miami when he was prevented from lighting a fuse to an explosive device inside

of his shoe. The commercial flight was diverted to Boston under Air Force escort. Reid was detained and removed from the plane. Agent Carl was immediately summoned from Washington, D.C. to the Boston airport in response to the Richard Reid arrest and detention.

7. Agent Carl reports that he examined the device that had been found in Richard Reid's shoe. It looked just like some tape. Agents at the airport had examined the item, determined there was no metal in it, and believed there was no detonator attached to an explosive. Thinking that there was no detonator attached to the explosive and that there was no metal suggesting a detonator, they initially believed that the item was not dangerous and that Reid was just a "screw up."

8. Based on the information Agent Carl had obtained during Mr. Ressim's May 23, 2001 debriefing, and his review of the object, Agent Carl determined that there was a detonator and that, in fact, it was connected to the explosive.

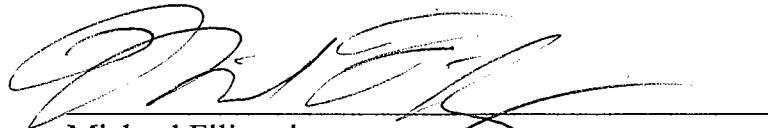
9. Agent Carl said it was fortunate that he had talked to Mr. Ressim and that he, Agent Carl, was summoned to the airport because this device, if mishandled, could have exploded and the examiner would likely have been severely injured or killed.

10. During the week of April 11, 2005, I had occasion to speak with Agent Carl on the telephone concerning an unrelated matter, and I took the opportunity to review with him my notes of our February 19, 2003, conversation. He advised that my notes of that conversation were accurate, and further told me that the explosives were very

sensitive and reiterated that the explosives could have gone off if mishandled with a detonator attached. If that event were to have occurred, the individual handling the explosive device would likely have lost his or her life.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on this 19th day of April, 2005.

A handwritten signature in black ink, appearing to read 'M. Filipovic', written over a horizontal line.

Michael Filipovic
Assistant Federal Public Defender
Attorney for Ahmed R~~essam~~