

## EXHIBIT 4

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) ECF Case
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**DECLARATION OF ALI AHMAD ALI HAMAD**

I, Ali Ahmad Ali Hamad, being duly sworn, declare and state as follows:

1. I am over eighteen years of age and competent to testify to the matters set forth below on the basis of my own personal knowledge.
2. I was born on November 13, 1971, in Manama, Bahrain.
3. When I was seventeen (17) years old, I was recruited to join Osama bin Laden's al Qaida terrorist organization.
4. I was an active member of al Qaida from 1991 until 1997, when I was arrested and subsequently imprisoned in Bosnia-Herzegovina.
5. I formally renounced my affiliation with al Qaida after the September 11, 2001 terrorist attack upon the United States, although I had become disillusioned with al Qaida prior to that time.
6. On the basis of my experiences as a member and official of al Qaida, as described in greater detail below, I have personal knowledge of the inner-workings of al Qaida, its objectives and operations, and certain sources of its vast financial and logistic support.

**A. My Training and Experiences with al Qaida in Afghanistan**

7. In or around the beginning of 1991, representatives of al Qaida in Bahrain advised me that it was time for me to travel to Afghanistan for training to become one of “Allah’s warriors.”

8. The representatives of al Qaida in Bahrain arranged for me to travel by car from Bahrain to Saudi Arabia, and by plane from Saudi Arabia to Islamabad, Pakistan, and advised me that representatives of al Qaida would greet me at the Islamabad International Airport.

9. Upon my arrival at the Islamabad International Airport, representatives of al Qaida greeted me, and arranged for my transit to an al Qaida training camp in Afghanistan.

10. In total, I spent thirteen months in Afghanistan, during which time I received training at several different al Qaida camps.

11. While in Afghanistan, I personally met Osama bin Laden on numerous occasions, and swore an oath to al Qaida in Osama bin Laden’s presence.

12. The members of al Qaida do not use their proper names within the organization. As a member of al Qaida, I was known primarily by the alias Abu Ubeidah.

13. In or around late 1991 or early 1992, I was instructed by Osama bin Laden to return to Bahrain, and await instructions from al Qaida where to go next.

**B. The Bosnian War**

14. In early 1992, a war broke out in Bosnia-Herzegovina, primarily between Bosnian Muslims and Bosnian Serbs, although Bosnian Croats were also involved in the conflict to a lesser degree (the Bosnian War).

15. The Bosnian War continued until the signing of the Dayton Peace Accords (Dayton Accord) in 1995.

16. Shortly after the outbreak of the Bosnian War, foreign Islamic fighters began traveling to Bosnia-Herzegovina to fight with the Bosnian Muslims and wage jihad against the Bosnian Serbs. These foreign fighters are referred to as the “mujihadeen” throughout this declaration, which was also the term used to refer to those foreign fighters during the Bosnian War.

17. At the inception of the Bosnian war, Osama bin Laden and the al Qaida leadership decided that al Qaida should actively participate in that conflict, and began sending al Qaida members, including myself, to Bosnia to fight as mujihadeen.

18. Throughout the Bosnian War, the mujihadeen forces in Bosnia operated under the direction of al Qaida leadership.

19. Al Qaida’s primary objective in participating in the Bosnian War was not to help the Bosnian Muslims, but rather to establish a base of operations in Bosnia to support future al Qaida operations in Europe and the West.

**C. My Experiences in Bosnia-Herzegovina as a Member of al Qaida**

20. Shortly after the outbreak of the Bosnian War in early 1992, Prince Mohammad al Fatih al Bahraini advised me that the al Qaida leadership had issued an order that I travel to Bosnia, to participate in the jihad against the Serbs.

21. Initially, I delayed traveling to Bosnia, and Prince Mohammad al Fatih al Bahraini went ahead to Bosnia without me.

22. Shortly thereafter, Prince Mohammad al Fatih al Bahraini was killed while commanding mujihadeen forces in Bosnia in an operation against the Serbs.

23. Approximately three months after Prince Mohammad al Fatih al Bahraini was killed, I received a second directive from al Qaida to travel to Bosnia to participate in the jihad against the Serbs, and at that time complied with the directive of the al Qaida leadership.

24. Before departing Bahrain, representatives of al Qaida explained that I should travel to the mosque in Zagreb, Croatia, and that I would be received at the mosque by individuals who would recognize and assist me.

25. In accordance with the instructions provided to me by al Qaida, I traveled from Bahrain to Germany by plane, and by plane from Germany to Zagreb, Croatia, where I proceeded to the designated mosque.

26. At the mosque in Zagreb, I was received by several individuals, including a man known by the alias Abu Ayman, the head of the Third World Relief Organization.

27. On the following day, Abu Ayman helped me to set off for Split, Croatia by bus.

28. In accordance with the instructions provided by al Qaida in advance of my trip, I then traveled by bus from Split, Croatia to Travnik, Bosnia.

29. Upon my arrival in Travnik, Bosnia, I was met by a young soldier of the Muslim forces in Travnik, who spoke Arabic perfectly.

30. I traveled with the young representative of the Muslim forces who had greeted me at the bus station, along with two other foreign fighters who had arrived on the same bus from Split, to Muslim forces command in Travnik, where I was received by a brigadier of the Muslim forces known as Asim.

31. At the time of my arrival in Travnik, the commander of the mujihadeen forces in Bosnia was Ebu Abdel Aziz, who was known within the mujihadeen forces as Abdel Aziz or "Red Beard."

32. Through my prior experiences in Afghanistan, I personally knew Ebu Abdel Aziz as one of the leaders of al Qaida.

33. Prior to leaving Bahrain for Bosnia, I had received information from al Qaida representatives in Bahrain that Ebu Abdel Aziz was being sent to Bosnia by al Qaida to organize the mujihadeen forces.

34. From the date I reached the mujihadeen forces in 1992 until the signing of the Dayton Accord in 1995, I fought as a member of the mujihadeen forces in the Bosnian War. Throughout that time, I was a member of al Qaida, acting in accordance with the directives of that terrorist organization.

35. Shortly after my arrival in Bosnia, I was appointed by al Qaida to serve as a deputy commander of a unit of 107 fighters, including 70 Arabs, approximately 25 Turks, and about 12 Bosnians.

36. Following the signing of the Dayton Accord, I remained in Bosnia-Herzegovina, serving as an active member of al Qaida until my arrest in 1997.

**D. The Involvement of Ostensible Islamic Charities in Supporting al Qaida's Activities**

37. I can attest on the basis of personal knowledge that al Qaida's operations in Bosnia, including the activities of the al Qaida fighters who participated in the Bosnian War, were funded and otherwise supported by purported Islamic charitable organizations and institutions, including the Third World Relief Agency, and the Saudi High Commission for Relief of Bosnia & Herzegovina (Saudi High Commission).

38. As mentioned above, upon my initial arrival in Zagreb, Croatia, I was received by Sudanese employees of the Third World Relief Agency, including Abu Ayman.

39. When he greeted me in Zagreb, Abu Ejman advised me that he had received an advance call from Bahrain informing him of my travel plans, and that he had been given the responsibility to assist me in reaching the mujihadeen forces.

40. During the course of the Bosnian War, Abu Ejman delivered truckloads of food and other supplies belonging to the Third World Relief Agency to my military unit, to sustain our activities and efforts in Bosnia.

41. On the basis of my personal knowledge, I can attest that the Saudi High Commission was extensively involved in supporting al Qaida's operations in Bosnia, both before and after the Bosnian war.

42. I can attest from personal knowledge that representatives of the Saudi High Commission provided extensive financial support and food to the mujihadeen forces, and also permitted the mujihadeen and al Qaida members in Bosnia to use the Saudi High Commission's offices and rented houses.

43. In addition to providing food, money and shelter to support al Qaida's operations in Bosnia, the Saudi High Commission frequently transported mujihadeen and al Qaida members throughout Bosnia-Herzegovina, in Saudi High Commission vehicles bearing the mark of the United Nations High Commission for Refugees (UNHCR), thereby allowing those mujihadeen and al Qaida members to pass military and police checkpoints.

44. I was personally transported by the Saudi High Commission in a vehicle bearing UNHCR marks in late 1994 or early 1995, along with another wounded mujihadeen, from Bosnia-Herzegovina to Zagreb, Croatia. On the occasion of that trip, a representative of the Saudi High Commission also provided me with money for further travel expenses.

45. During the Bosnian war, the Saudi High Commission appointed a number of former mujihadeen fighters to serve as officers or directors of its branch offices in Bosnia-Herzegovina.

46. For example, in 1993 the director of the Sarajevo office of the Saudi High Commission was a Saudi I knew by the name of Abu al-Miqdad al-Dusari.



47. Al-Dusari was among the first mujihadeen to arrive in Bosnia-Herzegovina at the beginning of the Bosnian War.

48. Al-Dusari temporarily left Bosnia-Herzegovina, but later returned to serve as the director of the Sarajevo office of the Saudi High Commission.

49. Similarly, at the request of the mujihadeen in 1994, the Chief Director of the Saudi High Commission in Zagreb appointed a man I knew by the name of Hasam al-Din to serve as the director of the Zenica office.

50. Hasam al-Din was also one of the first mujihadeen to arrive in Bosnia-Herzegovina at the beginning of the Bosnian War, and he engaged in significant military activities as a member of the mujihadeen forces placed in Tesanj, in the middle of Bosnia.

51. Hasam al-Din was wounded during the course of the war, and after recovering from his wounds, returned to Bosnia-Herzegovina as a representative of the Zenica office of the Saudi High Commission.

52. Following the conclusion of the Bosnian War, numerous al Qaida members remained in Bosnia-Herzegovina, in accordance with the wishes and directives of al Qaida leadership.

53. I myself remained in Bosnia-Herzegovina following the conclusion of the Bosnian War, and was an active member of al Qaida until my arrest in 1997.

54. After the conclusion of the Bosnian War, the Saudi High Commission provided ostensible employment to a number of foreign fighters and al Qaida members who had fought in the War.

55. I myself received official documentation, certified by the stamp of the Saudi High Commission and bearing the signature of the Director of the Saudi High Commission's Mostar office, indicating that I was an employee of the Saudi High Commission.

56. At the time the director of the Mostar office of the Saudi High Commission provided me with that documentation, he was aware that I was a member of al Qaida.

57. In addition to the documentation described above, following the Bosnian War, the Saudi High Commission provided me access to vehicles with diplomatic car registrations, and vehicles registered to the UNHCR, which enabled me to move freely throughout Bosnia-Herzegovina.

58. At the times when the Saudi High Commission provided me with access to vehicles with diplomatic or UNHCR registrations, I was an active member of al Qaida, a fact which was known to the officials of the Saudi High Commission who provided me such access.

I hereby declare that all of the foregoing statements are true and correct.

/s/ Ali Ahmad Ali Hamad  
Ali Ahmad Ali Hamad

Executed on March 4, 2008 in the city of Doboj, Bosnia-Herzegovina.