

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term
Grand Jury Sworn in on May 7, 2012

UNITED STATES OF AMERICA	:	CRIMINAL NO. CR-08-360 (RCL)
	:	
	:	VIOLATIONS:
v.	:	
	:	
PAUL ALVIN SLOUGH,	:	18 U.S.C. §§ 3261(a)(1), 1112
	:	(Voluntary Manslaughter)
NICHOLAS ABRAM SLATTEN,	:	
	:	
EVAN SHAWN LIBERTY,	:	18 U.S.C. §§ 3261(a)(1), 1113
	:	(Attempt to Commit Manslaughter)
DUSTIN LAURENT HEARD,	:	
	:	
Defendants.	:	18 U.S.C. §§ 3261(a)(1), 924(c)
	:	(Using and Discharging a Firearm During
	:	and in Relation to a Crime of Violence)
	:	
	:	
	:	18 U.S.C. § 2
	:	(Aiding and Abetting and Causing
	:	an Act to be Done)

INDICTMENT

The Grand Jury charges that:

COUNT ONE
(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, and DUSTIN LAURENT HEARD, 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 or 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, another joint offender known to the Grand Jury having been arrested in the District of Columbia, 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, defendant NICHOLAS ABRAM SLATTEN 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 individual:

COUNT ONE: Ahmed Haithem Ahmed Al Rubia'y.

(Voluntary Manslaughter, in violation of Title 18, United States Code, Sections 3261(a)(1), 1112.)

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

6. The Grand Jury realleges and incorporates by reference as if fully stated herein paragraphs 1 through 4 of Count One 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, and DUSTIN LAURENT HEARD, 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 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
(Attempt to Commit Manslaughter)

8. The Grand Jury realleges and incorporates by reference as if fully stated herein paragraphs 1 through 4 of Count One 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, and DUSTIN LAURENT HEARD unlawfully and intentionally, upon a sudden quarrel and heat of passion, did attempt to commit manslaughter by attempting to kill the following individuals, who were wounded as a result therefrom:

COUNT FIFTEEN: Majed Salman Abdel Kareem Al-Gharbawi
COUNT SIXTEEN: Jennan Hafidh Abid al-Razzaq
COUNT SEVENTEEN: Yasmin Abdul Kidr Salhe
COUNT EIGHTEEN: Haydar Ahmad Rabie Hussain Al-Khafaji
COUNT NINETEEN: Hassan Jaber Salman
COUNT TWENTY: Farid Walid Hasoun Al-Kasab
COUNT TWENTY-ONE: Abdul Amir Raheem Jihan Yasser
COUNT TWENTY-TWO: Wisam Raheem Fliah Hasan Al-Miri

COUNT TWENTYTHREE: Talib Mutluk Diwan
COUNT TWENTY-FOUR: Adel Jaber Sham'ma Al-Jadiri
COUNT TWENTY-FIVE: Nasir Hamzah Latif Al-Rikabi
COUNT TWENTY-SIX: Mahdi Abid Khider Abbas Al-Faraji
COUNT TWENTY-SEVEN: Fawziyyah Aliwi Hassoon
COUNT TWENTY-EIGHT: Ali Hadi Naji Al-Rubaie
COUNT TWENTY-NINE: Alah Majeed Sghair Zaidi
COUNT THIRTY: 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.)

COUNTS THIRTY-ONE AND THIRTY-TWO

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

11. On or about September 16, 2007, in the city of Baghdad, in the Republic of Iraq, defendant PAUL ALVIN SLOUGH unlawfully and intentionally, upon a sudden quarrel and heat of passion, did attempt to commit manslaughter by attempting to kill the following individuals, who were wounded as a result therefrom:

COUNT THIRTY-ONE: Bara Sadoon Ismail Al-Ani

COUNT THIRTY-TWO: Sami Hawa Hamud Al-Sabahin

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

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

13. 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, and DUSTIN LAURENT HEARD 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-Two 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

Ronald C. Mather Jr. / mme

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