

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

**ABU AGILA MOHAMMAD
MAS'UD KHEIR AL-MARIMI,**

Defendant.

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Case No. 22-cr-392 (DLF)

**UNITED STATES' SUPPLEMENTAL FILING IN SUPPORT OF ITS MOTION TO
AFFORD VICTIMS OF THE BOMBING OF PAN AM FLIGHT 103 REMOTE VIDEO
AND TELEPHONIC ACCESS TO COURT PROCEEDINGS IN THIS CASE**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia (hereinafter, “the government”), respectfully submits this supplemental information in accordance with the Court’s June 18, 2004, and September 18, 2024, Minute Orders, and the Court’s October 16, 2024 Order, concerning the “United States’ Motion to Afford Victims of the Bombing of Pan Am Flight 103 Remote Video and Telephonic Access to Court Proceedings in this Case,” ECF 51.¹

I. BACKGROUND

On June 18, 2024, the Court ordered the government to “(1) finalize its list of individuals who meet the statutory definition of victim and wish to have access to court proceedings and (2) provide the Court with the total number of victims and geographic locations for each victim (city, town, or general geographic location) to assist the Court in making ‘reasonable efforts’ to provide

¹ The government incorporates its original Motion (ECF 51) by reference herein, as well as the facts, legal arguments, and the entirety of the “United States’ Reply in Support of [its] Motion” (“Reply Motion”) as well, which was filed on June 24, 2024. ECF 54.

remote access to victims. Act to provide Remote Access to court Proceedings for Victims of the 1988 Bombing of Pan Am Flight 103 over Lockerbie, Scotland, Pub. L. No. 118-37, 138 Stat. 11.”

Victim Notification System

In response to the Court’s mandate, the government first reviewed existing victim information contained in the Victim Notification System (“VNS”).² VNS is the Department of Justice’s primary electronic system for retaining victim data in criminal cases, including information such as an individual’s name and e-mail address. As a system, however, VNS does not contain enough information for a user to determine whether an individual would qualify as a “victim” in this specific case, under the broadly phrased statutory definition found in Public Law No. 118-37(a)(1)(B), 138 Stat.11. In addition, in a case such as this where victims may have submitted their information to the FBI many years ago, VNS does not necessarily provide accurate information concerning an individual’s current geographic location. Thus, the VNS database proved to be an inadequate vehicle for compiling the information needed by this Court. “*Declaration of Benjamin B. Shannon*,” Victim Outreach Strategy and Support Program Manager, FBI-Victim Services Division (referred to and incorporated by reference as **Exhibit 1**, the “*Shannon Declaration*”) at ¶ 5.

Victim Access Questionnaire

Thus, the trial team determined that it was necessary to collaborate with the Federal Bureau of Investigation’s Victim Services Division (“FBI-VSD”) to determine an accurate way to gather

² VNS provides victims of federal crime with information regarding their case as it proceeds through the criminal justice system. The agencies participating in VNS include the Federal Bureau of Investigation (“FBI”), U.S. Attorney’s Offices (“USAO’s”), and other Department of Justice components. VNS is the primary electronic system for retaining victim data in criminal cases. The project is funded through the Crime Victims Fund managed by the Office for Victims of Crime. The Executive Office for the United States Attorneys is the lead agency for this project. *Id.*

the information needed by the Court. The FBI-VSD and the trial team designed the “*Victim Access Questionnaire*” (VAQ) for use in obtaining the requisite information. *See also Exhibit 1-1* “VAQ” (PDF Copy). The VAQ was designed to enable the government to gather information from victim-respondents, including each victim’s connection to the case, information about whether they wished to view or listen to the trial and other court proceedings, their Personal Identification Information (PII) (*e.g.*, dates of birth, address), their geographic location, and information concerning the existence of any medical and/or logistical hardships. *See Exhibit 1*, Shannon Declaration, ¶¶ 6, 7.

Government’s Outreach Efforts to Victims

The trial team and FBI-VSD undertook the following outreach efforts concerning victims: (1) posted messages to complete the VAQ on the FBI’s case website; (2) sent repeated messages via VNS encouraging victims to fill out the VAQ; (3) asked victims, victim groups, and the Scottish authorities to urge other victims to complete the VAQ; and (4) held two virtual webinars for victims to explain the definition of who qualified as a “victim” under PL 118-37 and to encourage victims to sign up for VNS messages and to fill out the VAQ. *See Exhibit 1*, Shannon Declaration, ¶ 8. In addition to the government’s efforts, the British Broadcasting Company (BBC) published a story informing the public about the new U.S. law specific to this case providing access to victim family members in the United Kingdom and elsewhere and conveying the need to register as a victim and to complete a victim questionnaire in time to ensure that they had access to the Court’s proceedings.³ *Id.* at ¶ 9.

³ The government did not request or solicit the article that was published by the BBC.

II. VAQ DATA OBTAINED

The data generated by the VAQ is attached to the Shannon Declaration, referred to as **Exhibit 1-2** “Accumulated Victim Data” and incorporated herein.⁴ See Shannon Declaration ¶ 10. A total of 417 victim-respondents responded to some or all of the VAQ questions: 244 victim-respondents from 29 states and the District of Columbia in the United States, and 173 victim-respondents from nine foreign countries dispersed geographically around the globe. **Exhibit 1**, Shannon Declaration, ¶ 10. The summary of the data was compiled as of October 21, 2024. *Id.* at ¶ 11. While these numbers may change over time,⁵ the larger conceptual arguments about the data will remain the same.

VAQ and Results -- Victims Are Dispersed Both Globally and Throughout the Entire United States

As the Shannon Declaration indicates, in response to the “threshold question of geographic location,” of the **417** victim-respondents to the VAQ, **173** victims were from foreign countries, with 164 spread out inside the United Kingdom (throughout Scotland and the United Kingdom),

⁴ Certain PII and information that is not relevant to the Court’s analysis has been deleted from Exhibit 1-2 for privacy purposes, to include the full names, addresses, dates of birth, and e-mail addresses of the VAQ respondents. Their geographic location to include city, state, country, and their answers to the some of the VAQ questions, were retained in **Exhibit 1-2**, which we have attached to this filing. The government will provide a version of this data in Excel format to the Court and counsel. The Excel spreadsheet will include the answers to Questions 7 and 8, some of which may be identifying when read in conjunction with questions like city, state, country, and relationship to a victim. Non-identifying summaries of the responses to Questions 7 and 8 are also attached hereto as Exhibits 1-4 and 1-5, respectively.

⁵ As noted in its Reply Motion, the government’s efforts to identify individuals who meet the statutory definition of a “victim” under the Pan Am Flight 103 legislation will not result in a “final” list, as the government will be hard-pressed to turn away a victim heretofore unknown, who then later comes forward seeking the status to which they are statutorily entitled, and requests access to the proceedings. ECF 54, n. 3.

two from The Netherlands, and one each respectively from seven other countries: Spain, Czech Republic, Ireland, Canada, Mozambique, Australia, and Jamaica. The geographic location of these overseas respondents is diverse. *See Exhibit 1*, Shannon Declaration, ¶ 12a. *See Exhibit 1-3*, “Interactive Google Map of Victims Globally and Throughout the United States.”⁶

In the United States, victim-respondents to the VAQ numbered **244** from 29 states and the District of Columbia, and were spread out geographically, with victims located in states such as Washington, California, Arizona, Hawaii, Florida, Texas, Michigan, Minnesota, and Utah. *See Exhibit 1*, Shannon Declaration, ¶ 12b. *See Exhibit 1-3*, “Interactive Google Map of Victims Globally and Throughout the United States.”

Victims Prefer Video/Audio Access to Trial Proceedings Via Virtual Weblink or App

Other data obtained indicated that when victim-respondents were asked about whether they sought access to attend the trial in person (*Exhibit 1-2*, Data), **143** victim-respondents said, “yes” while **181** victim-responded “no.” Shannon Declaration, ¶ 13.⁷ When the answers to the totality

⁶ To visually assist this Court, the government created three interactive Google Earth files, which include inter-active features that allow users to explore and interact with the map in ways that static maps cannot, by listing “pink” geographic locations, plotted to the city level, for each victim who responded to the VAQ (in the United States and overseas). Users can hover over markers or shapes to see additional details. The Interactive Google Earth Files enable the Court to visualize three different sets of data: (1) the victims worldwide and in the United States (in pink); (2) all U.S. Courthouses superimposed (in blue); and (3) all U.S. Embassies and U.S. Consulates superimposed located within countries (in white). For certain city locations the Court may be able to hover the icon, to truly see the number of points of interest for that specific location. For example, clicking on the pin for Detroit, Michigan, reveals that three victims and a federal courthouse are in that city. Should the Court need assistance in accessing these Google Earth features, undersigned counsel is available to assist the Court or Court staff, which could be done in the presence of defense counsel.

⁷ As noted above, not all victim-respondents answered all of the questions on the VAQ. As a result, for any given question, there may be a different number of victim-respondents than for other questions.

of the VAQ are considered, the vast majority of the 181 victims who answered “no” still had an interest in participating in the proceedings, although not in person.

For example, Question 4 asked victims their preference to gain access to the trial proceedings if they were held virtually only (*i.e.*, they could watch and listen but not have to travel to court) if a Weblink or an application (“app”) were made available to them to observe the trial and/or other court proceedings. **Of 325 individuals who answered question 4, 305 victims, or approximately 94% indicated “yes,” that they would be interested in that type of access to the trial proceedings.** 20 responded “no.” *See* Declaration ¶ 14a-c.

Victim Preference for Virtual Audio Access to Trial Proceedings

As described in the Shannon Declaration, the victims were asked about their preference concerning attending the trial proceedings if a toll-free number, a weblink or app was made available to listen to the trial and/or other court proceeding, and whether they would be interested in listening to the trial and/or the other proceedings virtually. Exhibit 1, Shannon Declaration at ¶ 15. **Of 323 individuals who answered Question number 5 (Exhibit 1-2), 267 victims, or approximately 83%, responded “yes” that they would listen to the trial and/or the proceedings virtually if given that option;** 56 indicated “no” to this option. *Id.* at ¶ 15a-c.

Thus, the victims’ responses to questions 4 and 5 of the VAQ demonstrate an explicit preference to be able to access the proceedings in this case virtually.

Physical/Medical Hardships or Logistical Limitations Travel to/from Fixed-Sites

Question number 6 of the VAQ (**Exhibit 1-1**), asked victims if the trial and/or other court proceedings were made available for “remote viewing at a fixed location,” such as a courthouse, embassy, or a police station within 50 miles (80 km) of their home, whether they would be interested in traveling to that location. **165** indicated “no.” Shannon Declaration, ¶¶ 17a-b, 18, a-

c, 19. The written answers that the victims provided to questions number 7 and 8 shed light on the hardships that the victims believe that they face concerning these responses.

Question number 7 of the VAQ asked whether victims had physical/medical hardships or limitations that would make it difficult for the victims to travel to/from a courthouse, embassy, or police station to watch a closed-circuit broadcast of the trial and/or other court proceeding. The VAQ permitted, but did not require, victims to offer a narrative response. A complete listing of the respondent's concerns about their physical and medical hardships is contained in **Exhibit 1-4**.

Shannon Declaration ¶ 19. Examples include:

"I am being treated for stage 4 metastatic colon cancer at Memorial Sloan Kettering in NYC and cannot travel far from there or my home in New Jersey."

"I am a solo parent of three children and paying for childcare for them, to go view trial is not in my budget. Additionally, the added time off work to travel would be too much. lost income."

"I am in the U.K."

"No...but my wife is recovering from a lymphoma and other ailments."

"Yes, I'm 91 years old. In September...2024...I will be 92. I'm disabled (wheelchair bound) and can no longer travel."

"I suffer from C-PTSD [Complex-PTSD] and have a hearing impairment."

"I have childcare/transportation responsibilities that would make it very difficult, and may not allow, for me to travel to another location to watch a close-circuit broadcast."

"Travel is difficult for me due to my arthritis."

"I live in Honolulu, Hawaii and I am 89 years old."

"Yes, I am totally bed-bound."

"Yes, we all have PTSD and shouldn't be forced to travel to a public location to view the trial we should be able to watch the trial and grieve privately from our homes regardless of our proximity to D.C."

Question number 8 asked victims if they had any reason to believe that they would logistically be unable to physically travel to or from home to a courthouse, embassy, or police station to watch a closed-circuit television broadcast of the trial and/or other court proceedings if viewing were to be made available in that type of venue. *See* Shannon Declaration, **Exhibit 1-2** (Data); *see also*, Shannon Declaration **Exhibit, 1-5** (Victim Comments from Data for Question Number 8). ¶ 20. Victims providing responses explained why they would have logistical hardships and could not travel to view the proceedings at fixed remote sites. *Id.* ¶ 20. Examples highlighting their difficulties include:

“Yes, my child is medically complex and the COVID risk for that child from an in person viewing is too high.”

“No, but virtual will mean not taking off work, so it will allow me to actually follow all of it, as opposed to only occasionally being able to attend. It’s a massive difference for me.”

“I would be unable to travel.”

“I’m 89 and unable to travel. My husband...will be 92...in September...He’s disabled, and I’m his caregiver.”

“Yes, my age and disabilities make travel impossible for me.”

“Yes, I am physically/medically handicapped and can only drive distances less than 15 miles, round trip, daily.”

“I do not have a car.”

“It’s possible that we would not be able to travel based on age, ability, and medical conditions at the time of the trial. Today, we can both walk, but a fall can change that ability in a second.”

“No, I do not have physical problems...I would prefer to be in person in the court in the states...but if the only option is to watch the trial here in the Netherlands, then I accept that.”

“I suffer from anxiety.”

“I can travel but have Parkinson’s disease and chronic pain from spinal degenerative disc disease which may limit how long...”

“Yes, unfortunately, due to assisting an RAF pathologist at the ice-rink changing room in a number of post-mortems, I have severe PTSD and would not be able to watch [the trial] in the company of others.”

“I would not travel to a remote venue.”

“I would note that the ICC provided a live stream of video during their trial, and I was very happy to follow along two decades ago.”

“50 miles travel [would be] too far, have a child to collect from primary school.”

“I have childcare/transportation responsibilities that would make it very difficult and may not allow for me to travel to another location to watch a closed-circuit broadcast.”

“Yes, I have little children...[difficult]”

As the Court can see from the responses to questions number 7 and 8, a significant number of the victims do not have the capabilities — physically, emotionally, logistically, or financially – to travel to fixed-site locations to observe the trial proceedings.

III. ARGUMENT

A. A Fixed-Site Access Approach Poses an Unworkable Quagmire for the Court

The defense has argued that the Court should employ a fixed-site type of option and suggests that victims be required to travel to approximately 60 federal courthouses in the United States, plus additional U.S. Embassies or Consulates overseas, in order to be monitored in-person by government personnel while they observe trial and other court proceedings. This plan is logistically unreasonable, unfeasible, impractical, and unworkable.

First, as demonstrated by the VAQ data, the geographic distribution of the victims would make administration of fixed sites impracticable. A view of the Google Earth Files of the geographic locations of victims in the United States and globally (in pink) (**Exhibit 1-3**), with U.S.

Federal Courthouses⁸ (in blue), U.S. Embassies and U.S. Consulates (in white) superimposed onto their actual geographic locations, visually demonstrates the impracticality and unrealistic nature of employing a fixed-site approach to providing victim access to the proceedings. *See* Shannon Declaration, ¶17c; *see also* **Exhibit 1-3**. The visual display of the Google Earth Files requires some explanation, as the static view is different from the dynamic/interactive view. *See infra* at n. 6. For example, in Edinburgh, Scotland, or in Detroit, Michigan, in the static view, there appears to be one victim assigned to each city, but when each tab is clicked, there could appear to be 2-3 or more victims to each city dispersed in different distances and not in any close connection to the nearest Federal Courthouse or a U.S. Consulate.

Likewise, for example, there are 164 victims in the U.K, and many throughout Scotland and the entirety of the United Kingdom. With only one U.S. Embassy located in London and one U.S. Consulate in Edinburgh, and the victims spread all throughout the U.K., it would be nearly impossible for the large number of victims even in this one country to participate in the proceedings of this case based on their actual locations. Trying to locate the closest U.S. Embassies or Consulates to the victims located in Australia, Jamaica, The Netherlands, Czech Republic, Mozambique, Spain, Ireland, and Canada would be an even more daunting task.

Congress passed the Pan Am Flight 103 Victim Access legislation to be applicable to victims “regardless of their location.” In reviewing the data, it is evident that a fixed-site approach presents nearly insurmountable challenges. The victims are geographically dispersed such that requiring them to travel to fixed sites would present a significant hardship to the victims. At the same time, fixed sites would provide almost no economy of scale for the Court and the government

⁸ The government was unable to locate a definitive source for all U.S. Federal Courthouse locations. As a result, the government used data located on the internet that it believes may be overinclusive, in that it may include locations of former U.S. Federal Courthouses.

administering access: many fixed sites would have only a few victims in attendance, and the Courthouse and government personnel necessary to implement and monitor the proceedings would be overwhelming. By contrast, direct remote visual and/or audio access to trial or other court proceedings could be administered from a single location and monitored by government personnel remotely.

Second, the disparity in time zones would make the administration of fixed sites unfeasible because the majority of the victims identified in the VAQ reside outside of the time zone in which the trial will take place. For the purposes of this illustration, the government assumes that Court will start each day at 9:00 a.m. and conclude each day by 5:00 p.m., Monday through Friday. If a victim lives on the west coast in California, and a fixed-site courthouse approach were utilized, court staff would have to be employed to open court earlier than 6:00 a.m. in order to have victims screened/cleared to come into a room to watch the proceedings starting at 6:00 a.m. CST/9:00 EST. Likewise, if a victim in Hawaii wanted to attend, a viewing location in federal court would have to open at 2:00 a.m. (6 hours earlier than EST) to properly prepare the victims to watch the proceedings at 3:00 a.m. in Hawaii. If a victim in the United Kingdom wanted to participate, a government employee in an Embassy or Consulate would need to be able to open a secure room at around 2:00 p.m. (6 hours ahead of 8:00 a.m. to prepare for 9:00 a.m.), but when court closes each day at 5:00 p.m., the time in the United Kingdom will be 11:00 p.m. To then require Embassy/Consulate staff and victims to stay each day past midnight, to travel home, and to do so all over again, each day, would be unworkable, unreasonable, unsafe, and logistically impossible to accomplish. This does not even account for the victims located in Mozambique, Australia, or other time zones.

By contrast, direct remote audio and/or visual access to the trial and other court proceedings via Zoom for Government (“ZFG”) platform could be administered from a single location in Washington, D.C. during typical Court hours and monitored remotely by government personnel. The proceedings would be broadcast to only those victims authorized to receive them, and in such a manner that the victims would be informed that recording and rebroadcasting was illegal. The victims’ identities would be verified prior to accessing the proceedings remotely; and it would be up to each victim to choose when and whether to access the proceedings. Such a solution would not require the Court and the government to devote additional resources to monitor each fixed site. ECF 54 at 7-12 (“Government Proposal Adequately Safeguards the Integrity of the Court’s Proceedings”).

Thus, the data collected by the VAQ bolsters the argument already made by the government that having fixed sites set up at several dozen federal courthouses in the United States, with additional viewing sites abroad at U.S. Embassies or Consulates, is impracticable and would not accomplish the purpose of the statute passed to afford all victims in this case remote access to the court proceedings, regardless of their location. ECF 52 at 10-11.

B. ZFG Video and Audio Platform is the Most Secure and Reasonable Plan for the Court to Implement Concerning Direct Victim Access to the Proceedings

Based on the foregoing discussion, we request that this Court provide victims – regardless of their location domestically and globally – direct access to the trial and other court proceedings using the existing U.S. Federal District Court ZFG platform in the District of Columbia. As the government has previously argued, *see generally* ECFs 51, 52, 54, ZFG is the most secure, sensible, logistical, and reasonable means by which this Court can provide access while protecting the integrity of the Court’s proceedings, ensuring the safety of the parties and witnesses, and comporting with Public Law No. 118-37 that Congress passed to apply only in this specific case.

The defense recognizes the secure “nature of a Zoom broadcast means that there is no highly specialized equipment necessary...that the broadcast need not take place in a courtroom...” ECF 52 at 10-11.

Notably, even if a fixed-site approach were used, the Court would be using ZFG as the platform for the broadcast. The key difference, other than the practical difficulties noted above, is how the monitoring would work. The government has described above and in its prior briefs and attachments how, under the government’s approach, the monitoring would be centralized, allowing the government and the Court to take swift action to cut off any unauthorized participants and/or any participants who attempt to violate the Court’s rules prohibiting retransmission. The audio watermark technology under the ZFG platform would allow Zoom to assist the Court in identifying the account from which any rebroadcast media was recorded, even “if someone records the meeting, with either a separate microphone or 3rd party [application] and shares the audio file without permission.” ECF 51-1 at 6; ECF 54 at 9.

Zoom has recommended that the Court enable watermarking for all video, content, and audio. The video watermark feature superimposes an image, consisting of a meeting participant’s email address, onto the shared content they are viewing and over their video. The audio watermark, or audio signature, is an inaudible watermark of a user’s personal information embedded in the audio that is played through the receiving user’s speakers by the client receiving audio from Zoom meeting servers. This means that if someone records the meeting and shares the audio file without permission, Zoom can assist with determining which participant was responsible. ECF 51-1, Attachment A.

If any user – or anyone they illicitly allowed to be in the same room as them, out of view of the monitors – were to record the proceedings using a separate device, that watermarked email

address would be visible in the recording. *Id.* In contrast, the fixed-site approach would take away this centralized monitoring ability and outsource it to numerous court staff and/or embassy personnel at more than 60 locations who would not be under the direct control of this Court or the government's team working on this case. In other words, the government's ZFG proposed approach maximizes the Court's ability to enforce security concerns, whereas the fixed-site approach – with the vast number of fixed sites that would be needed here – would minimize the ability to consistently enforce security concerns.

Moreover, the VAQ data suggests that the ability to listen (via ZFG audio) to the proceedings is more important to many victims than the ability to watch the proceedings. Many of the victims have had the opportunity to attend the trial of Abdelbaset al-Megrahi and Lamen Khalifah Fhimah at Camp Zeist in 2000, but they are all now 24 years older, and, as their responses to Questions 7 and 8 explain, they face many more physical and medical limitations and hardships than ever before. During the Megrahi criminal appeal, these same victims were given an opportunity to listen to the Scottish Crown Office's defense of the Megrahi Appeal before a three Scottish Judge Panel in or around 2020-2021. Those proceedings, which were highly publicized in nature, were shared via secure audio link with the victims and certain individuals, and no known security violations occurred. The ability to listen to those proceedings brought comfort to many of these victims. Given this track record, this Court should not have any reasonable concerns about these victims engaging in indecorous behavior or violations of Court rules. And, even in the unlikely event that a violation occurs, the Court still maintains its power to hold any potential violator in contempt as the Court always has the capacity to do in any such situation.

To the extent that the Court has security concerns about transmitting (some or all) images from court proceedings via ZFG to individual verified victims, rather than to fixed sites, the

government suggests that the Court could consider providing audio access, rather than video access, to the trial and other court proceedings using the ZFG platform to individual verified victims. Audio access would ensure the rights of victims to gain meaningful access to these proceedings, while at the same time providing additional security for the trial in that the images of witnesses and Court personnel would not be broadcast as part of the access. The audio ZFG option would permit the Court to maintain control of the security of the proceedings by restricting access to the proceedings to only those individuals who meet the definition of a victim and set forth by Congress and verified by the government.

In sum, as set forth in the government's prior submissions, three separate ZFG platform proposals put forth by the ZFG representative will satisfy the court's security concerns and can be used by ZFG to meet the Court's Minute Order considerations in providing video and audio access to the victims in this case. ECF 51, ECF 51-1. *See* Declaration of Josh Parecki, Zoom Chief Compliance Officer, Head of Trust and Safety, dated May 31, 2024.

CONCLUSION

Requiring these victims to travel to fixed sites would be unreasonable and serve as a *de facto* exclusion of a large number of victims in this case given the geographic disparity of the victim group. These families have suffered for more than three decades. This attack was the largest terror attack on the United States before September 11, 2001. 190 U.S. innocent citizens were killed. 43 UK nationals were killed, and it remains the single-most deadly terror attack in UK history. An entire city block in Lockerbie, Scotland, disintegrated into a burning inferno in seconds as the fuselage fell on the sleepy town at a time when everyone seemed to be sitting down to dinner and/or watching television. The devastation across the countryside left a crime scene for 862 square miles, or the entire width of Scotland.

Congress responded to the unique needs of the victims in this case by passing Pub. L. No. 118-37. The law passed by Congress applies only to this case. Given the death and destruction left by this bombing, and the palpable trauma and pain of the multiple victims spread globally throughout the world, one can only hope that another law like this one will never be needed again. Reasonable efforts to provide victims with remote access necessarily involves providing them with direct remote audio and/or video access to the trial and other court proceedings with the necessary safeguards for all parties involved, as outlined in the government's original motion. ECF 51.

Based on the foregoing, and for any additional reasons as may be cited at a hearing on this motion, the government respectfully requests that the Court make the proceedings in this matter directly available to verified victims via the Zoom for Government platform.

Respectfully submitted,

MATTHEW M. GRAVES
UNITED STATES ATTORNEY
D.C. Bar No. 481052

GREGG A. MAISEL
D.C. Bar No. 447902
Chief, National Security Section

/s/ **JEROME J. TERESINSKI**

JEROME J. TERESINSKI (PA Bar No. 66235)
Special Assistant United States Attorney
ERIK M. KENERSON (OH Bar No. 82960)
BRITTANY KEIL (D.C. Bar No. 500054)
Assistant United States Attorneys
National Security Section
United States Attorney's Office
601 D Street N.W.
Washington, D.C. 20530
(202) 252-7201
Erik.Kenerson@usdoj.gov

KATHLEEN CAMPBELL (MD Bar No. 9812170031)
JENNIFER BURKE (MD Bar No. 9706250061)
Trial Attorneys
Counter Terrorism Section
National Security Division
950 Pennsylvania Avenue N.W.
Washington, D.C. 20530

DECLARATION OF BENJAMIN B. SHANNON

**VICTIM OUTREACH STRATEGY AND SUPPORT PROGRAM MANAGER
FEDERAL BUREAU OF INVESTIGATION (FBI) – VICTIM SERVICES DIVISION**

EXHIBIT 1

1. I, Benjamin B. Shannon, the Victim Outreach Strategy and Support Program Manager for the Federal Bureau of Investigation (“FBI”) Victim Services Division (“VSD”), am responsible for the overall outreach and identification of victims in large scale and mass victimization investigations at the Headquarters level of the FBI throughout the United States and throughout the global reach where U.S. citizens are victims of federal crime. My primary responsibility is to assist victims of crime in federal criminal cases and assist to advise them of their rights as victims where the FBI has been the investigating agency, including in international terrorism cases.

2. I have assisted prosecutors and FBI agents in the case of the *United States v. Abu Agila Mohammed Mas’ud Kheir Al-Marimi* (DC-22-cr-392-DLF), the mid-air terrorism bombing of Pan Am Flight 103 on December 21, 1988, where 270 individuals were killed (190 U.S. nationals, 43 from the United Kingdom, 11 from Scotland, and victims from 19 other countries). Even though the bombing occurred over 35 years ago, the FBI and the U.S. Department of Justice have never stopped seeking justice for all the victims in this case.

3. Pursuant to my role as Victim Outreach Strategy and Support Program Manager for FBI VSD, and in working on this case, I have been made aware of the requirements of Public Law No. 118-37, passed by Congress, that are specific to the Pan Am 103 bombing case. I understand that this law requires the Court to make “reasonable efforts” to provide remote video and telephonic access to the trial for the victims of the bombing of Pan Am Flight 103, and also provides that the Court has discretion in

DECLARATION OF BENJAMIN B. SHANNON

**VICTIM OUTREACH STRATEGY AND SUPPORT PROGRAM MANAGER
FEDERAL BUREAU OF INVESTIGATION (FBI) – VICTIM SERVICES DIVISION**

EXHIBIT 1

controlling the manner, circumstances, or availability of remote video or telephonic transmissions where necessary to control the courtroom or protect the integrity of court proceedings or the safety of parties, witnesses, or other participants in the proceedings. I was also made aware that the law requires the Court to make whatever remote access it provides available “without regard to the location of the victim” of the crimes associated with the bombing of Pan Am Flight 103.

4. In reference to that law, I am aware that the Court issued a June 18, 2024 Minute Order ordering the government to gather information to understand the best and most reasonable way to implement that law. That Order directed the U.S. government to “finalize its list of individuals who meet the statutory definition of victim [under P.L. 118-37] and who wish to have access to court proceedings,” and “provide the Court with the total number of victims and geographic locations for each victim.” In response to the Court’s mandate, the government reviewed existing victim information contained in the Victim Notification System (“VNS”).¹ VNS is the primary electronic system for retaining victim data in criminal cases, including information such as an individual’s name and e-mail address. As a

¹ VNS provides victims of federal crime with information regarding their case as it proceeds through the criminal justice system. The agencies participating in VNS include the Federal Bureau of Investigation (“FBI”), U.S. Attorney’s Offices (“USAO’s”), and other Department of Justice components. VNS is the primary electronic system for retaining victim data in all criminal cases. The project is funded through the Crime Victims Fund managed by the Office for Victims of Crime. The Executive Office for the United States Attorneys is the lead agency for this project.

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FEDERAL BUREAU OF INVESTIGATION (FBI) – VICTIM SERVICES DIVISION**

EXHIBIT 1

system, VNS facilitates statutorily required victim notification and it contains the type of information needed to do that, however, the case file is where the victims are indexed, and VNS does not contain enough information for a user (in this case) to determine whether an individual would qualify as a “victim” under the broadly phrased statutory definition found in Public Law No. 118-37(a)(1)(B), 138 Stat.11. In a case such as this where victims may have submitted their information to the FBI many years ago, VNS does not necessarily provide accurate information concerning an individual’s current geographic location. Thus, the VNS database proved to be an inadequate source for compiling the information needed by this Court.

Victim Access Questionnaire (“VAQ”)

5. The trial team determined that it was necessary to collaborate with FBI-VSD to determine an accurate way to gather the information needed by the Court. The FBI-VSD and the trial team collaborated to design a “*Victim Access Questionnaire*” (VAQ) for use in obtaining the requisite information. **See also Exhibit 1-1 “VAQ” (PDF Copy).**

6. The VAQ was designed to enable the government to gather information from victim-respondents beyond the capabilities of the VNS, as it requested each victim’s connection to the case, their Personal Identification Information (PII) (e.g., full names, dates of birth, address, relationship to the decedents, full street addresses, zip codes, city, state, zip code), their actual geographic location, and information concerning the

DECLARATION OF BENJAMIN B. SHANNON

**VICTIM OUTREACH STRATEGY AND SUPPORT PROGRAM MANAGER
FEDERAL BUREAU OF INVESTIGATION (FBI) – VICTIM SERVICES DIVISION**

EXHIBIT 1

existence of any medical and/or logistical hardships that might impair their ability to access court proceedings in Washington, D.C. or at remote fixed locations.

U.S. Government Outreach to the Victims

7. The trial team and FBI-VSD undertook the following outreach efforts concerning victims: (1) posted messages to complete the VAQ on the FBI's case website; (2) sent repeated messages via VNS encouraging victims to fill out the VAQ; (3) asked victims, victim groups, and the Scottish authorities to urge other victims to complete the VAQ; and (4) held two virtual webinars for victims to explain the definition of who qualified as a "victim" under PL 118-37 and to encourage victims to sign up for VNS messages and to fill out the VAQ.

8. In addition to the government's efforts, I am aware that the British Broadcasting Company (BBC) published a story informing the public about the new U.S. law specific to this case, providing access to victim family members in the United Kingdom and elsewhere, and conveying the need to be identified as a victim by law enforcement and prosecutors, and to complete a victim questionnaire in time to ensure that they had access to the Court's proceedings.

VAQ Data Obtained

9. The accumulated VAQ data is attached to this Declaration, referred to as **Exhibit 1-2, "Accumulated Victim Data,"** and incorporated by reference. A total of **417** respondents responded to some or all of the VAQ questions. **244** respondents from 29

DECLARATION OF BENJAMIN B. SHANNON

**VICTIM OUTREACH STRATEGY AND SUPPORT PROGRAM MANAGER
FEDERAL BUREAU OF INVESTIGATION (FBI) – VICTIM SERVICES DIVISION**

EXHIBIT 1

states (and the District of Columbia) in the United States, and 173 respondents from nine foreign countries dispersed geographically around the globe.

10. The VAQ data will continue to be collected as more victims continue to respond. The information below is summarized as of October 21, 2024.

VAQ and the Results

11. In reviewing the data contained in **Exhibit 1-2**, the initial threshold question of geographic location showed the following:

a. **173** victim-respondents were from nine foreign countries as follows:

United Kingdom	164 (to include Scotland and Great Britian)
Spain	1
The Netherlands	2
Ireland	1
Czech Republic	1
Mozambique	1
Jamaica	1
Australia	1
Canada	1

These results are depicted visually in **Exhibit 1-3**, “Interactive Google Map of Victims Globally and Throughout the United States.”

b. 244 victim-respondents were from the United States, from 29 different states and the District of Columbia, as follows:

Arizona	4
California	28
Colorado	3
Connecticut	9
District of Columbia	2
Florida	11
Georgia	4

DECLARATION OF BENJAMIN B. SHANNON

**VICTIM OUTREACH STRATEGY AND SUPPORT PROGRAM MANAGER
FEDERAL BUREAU OF INVESTIGATION (FBI) – VICTIM SERVICES DIVISION**

EXHIBIT 1

Hawaii	3
Illinois	6
Massachusetts	20
Maryland	6
Michigan	16
Minnesota	3
Missouri	1
North Carolina	3
New Hampshire	4
New Jersey	26
New York	38
Ohio	6
Oregon	1
Pennsylvania	19
Rhode Island	2
South Carolina	4
Tennessee	5
Texas	5
Utah	1
Virginia	5
Washington	7
Wisconsin	1

These results are depicted visually in **Exhibit 1-3**, “Interactive Google Map of Victims Globally and Throughout the United States.”

Majority of Victims Prefer Video/Audio Access to Trial Proceedings Via Virtual Weblink/App

12. In response to Question number 3 (**Exhibit 1-2**) – i.e., whether the victims would be interested in attending the trial and/or other court proceedings in Washington, DC in May of 2025 in person – of those who responded to this question, 143 victims indicated, “Yes” that they would like to attend the trial in person and 181 responded “No.”

DECLARATION OF BENJAMIN B. SHANNON

**VICTIM OUTREACH STRATEGY AND SUPPORT PROGRAM MANAGER
FEDERAL BUREAU OF INVESTIGATION (FBI) – VICTIM SERVICES DIVISION**

EXHIBIT 1

13. In response to Question number 4 (**Exhibit 1-2**) – i.e., if a weblink or application (App) was made available to them to observe the trial and/or other court proceedings, would they be interested in observing the trial and/or those proceedings virtually (i.e., not in court) – the results from 325 individuals who responded were as follows.

- a. 305 indicated “Yes” that they would be interested in virtually watching and listening to the trial via a weblink or app provided by the Court.
- b. 20 responded “No.”

Audio Access Alone

14. In response to Question number 5 (**Exhibit 1-2**) – i.e., whether, if a toll-free number, weblink or app was made available to listen to the trial and/or other court proceeding, they would be interested in listening to the trial and/or the other proceedings virtually – the results from the 323 individuals who responded were as follows:

- a. 267 victims responded “Yes” that they would listen into the trial and/or the proceedings virtually if given that option.
- b. 56 indicated “No” to this option.

15. In Question number 6 (**Exhibit 1-2**), victims were asked specifically about “fixed site locations.” Specifically, they were asked that if the trial and/or other court proceedings were made available for remote viewing at a fixed location, such as a courthouse, embassy, or a police station within 50 miles (80 km) of their home, whether

DECLARATION OF BENJAMIN B. SHANNON

**VICTIM OUTREACH STRATEGY AND SUPPORT PROGRAM MANAGER
FEDERAL BUREAU OF INVESTIGATION (FBI) – VICTIM SERVICES DIVISION**

EXHIBIT 1

they would be interested in traveling to that location. **165** respondents answered “No” that they would not attend a fixed site location.

17. For the Court’s reference, a Google interactive map (**Exhibit 1-3**) displays the geographic location of each victim in the United States and globally (in pink), along with the superimposed locations (in white) of U.S. Courthouses and U.S. Embassies and U.S. Consulates world-wide.

18. VAQ Question number 7 (**Exhibit 1-2**) gathered information about whether victims have physical/medical hardships or limitations that would make it difficult for the victims to travel to/from a courthouse, embassy, or police station to watch a closed-circuit broadcast of the trial and/or other court proceedings. Respondents were invited, but not required, to give a narrative answer. Various respondents indicated that they would consider travel to a fixed site to be a medical or physical hardship. They provided written explanations for their hardship reasons. See **Exhibit 1-4**.

19. VAQ Question number 8 (**Exhibit 1-2**) gathered information about whether victims have other logistical hardship limitations that would hinder their ability to travel to a fixed-site location to attend the proceedings in this case. Respondents were invited, but not required, to give a narrative answer. Various respondents indicated that they would have a hardship of some type. They provided written responses and reasons explaining their hardships. See **Exhibit 1-5**.

20. I provide this information to assist the Court in making its reasonableness determination concerning victim access in the above-referenced case. I make these

DECLARATION OF BENJAMIN B. SHANNON

**VICTIM OUTREACH STRATEGY AND SUPPORT PROGRAM MANAGER
FEDERAL BUREAU OF INVESTIGATION (FBI) – VICTIM SERVICES DIVISION**

EXHIBIT 1

representations to the best of my ability, based on my personal knowledge and on information that has been relayed to me by other victim services professionals and case participants.

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



BENJAMIN B. SHANNON

Executed on: 10/23/2024
Date

[Home](#) • Seeking Victim Information Concerning Pan American Flight 103

**Seeking Victim Information Concerning Pan American Flight 103
(The Lockerbie Scotland Bombing)
United States v. Abu Agila Mohammed Mas'ud Kheir Al-Marimi
Case: DC-22-cr-392-DLF**

The Federal Bureau of Investigation's (FBI's) Counter Terrorism Division and the U.S. Department of Justice are engaging in an effort to identify all victims who have been affected by, and are eligible for, victim services in the case of the United States v Abu Agila Mohammed Mas'ud Kheir Al-Marimi (DC-22-cr-392-DLF), which has been set for a jury trial on May 12, 2025, in the U.S. District Court of the District of Columbia. The Defendant (Mas'ud) has been charged with destruction of an aircraft resulting in death, in violation of 18 U.S.C. §§ 32(a)(1) and (a)(2), and destruction of a vehicle used in foreign commerce by means of an explosive resulting in death, in violation of 18 U.S.C. § 844(i). 270 individuals were killed in the bombing (259 aboard the aircraft, and 11 on the ground in Lockerbie, Scotland).

The U.S. Congress has passed legislation to make remote access to court proceedings in this case available to victims. The law defines a "victim" of the attack on Pan Am Flight 103 as follows: (1) you were present at or near the scene in Lockerbie, Scotland, when the bombing occurred or immediately thereafter and you suffered direct or proximate harm (e.g., physical or emotional injury) as a result of the bombing of Pan Am Flight 103, or (2) you are the spouse, legal guardian, parent, child, brother, sister, next of kin, or other relative of someone who was killed aboard Pan Am 103 or killed or harmed on the ground in Scotland, or someone who possesses a relationship of similar significance to someone who was killed or harmed in the attack as defined above. If you believe you meet this definition of a victim and would like to receive remote access to the court proceedings and/or other victim services, please fill out this short form and click "submit" to send it to us.

We understand that this notice may be unexpected and raise questions for many who are connected to this tragedy. Please accept our apologies for any apprehensions caused by this sudden outreach, and rest assured that we have a team of dedicated individuals prepared to address any concerns you may have about this process. In the meantime, we are collecting this information in an effort to inform the court about the widespread geographic locations of our victim population, and to demonstrate how this may affect your personal and physical capabilities to access the trial proceedings in person.

Furthermore, the FBI is legally mandated to identify victims of federal crime in open FBI investigations. Identified victims are entitled to certain rights under federal and/or state law and may be eligible for certain services and restitution. Your responses to this survey are entirely **voluntary**, but will certainly assist our investigation and prosecution of this case while ensuring that you receive access to needed services as a potential victim. Based on your responses, you may be contacted by the FBI for additional information. Identifying information for all victims will be kept confidential.

Once again, please know that you may reach out to PanAm103families@fbi.gov with any questions prior to participating.

Contact Information

First Name
Middle Name
Last Name
Date of Birth
--
Phone Number
E-Mail Address
Address Line 1
Address Line 2
City
State
Country
ZIP/Postal Code

Questionnaire

1. Please share the name(s) of your loved one(s) that was/were killed or suffered direct and proximate harm as a result of the attack on Pan Am Flight 103 over Lockerbie, on December 21, 1988. If you personally suffered harm from that attack and were present on the scene or immediately thereafter, please write "self."

Pan Am Victim

2. Please provide your relationship to the victim(s) named in question number 1, if any. If you are that victim, please write "self."

3. Would you be interested in attending in person the trial and/or other court proceedings in Washington, D.C., in May of 2025?

Yes

No

4. If a weblink or application (app) was made available to you to observe the trial and/or other court proceedings, would you be interested in observing the trial and/or those proceedings virtually?

Yes

No

5. If a toll-free number, weblink, or app was made available to you to listen to the trial and/or other court proceedings, would you be interested in listening to the trial and/or other proceedings virtually?

Yes

No

6. If the trial and/or other court proceedings were made available for remote viewing at a fixed location, such as a courthouse, embassy, or police station within 50 miles (80 km) of your home, would you be interested to traveling to that location?

Yes

No

7. Do you have physical/medical hardships or limitations that would make it difficult for you to travel to/from a courthouse, embassy, or police station to watch a closed-circuit broadcast of the trial and/or other court proceedings? [You do not need to disclose the physical/medical hardship if you do not wish to do so.]

8. Do you have any reason to believe that you would be unable to physically travel to or from home to a courthouse, embassy, or police station to watch a closed-circuit television broadcast of the trial and/or other court proceedings if viewing were to be made available in that type of venue? In other words, do you have any physical/medical hardships in doing so? [You do not need to disclose the nature of those physical/medical hardships if you do not wish to do so.]

9. Would you need translation services to understand court proceedings that were held in English? If so, what language(s) do you speak?

Privacy Act Statement

The FBI is authorized to collect the information on this form by one or more of the following provisions: Title 28, United States Code, sections 533 and 534; Title 28, Code of Federal Regulations, section 0.85; and the Attorney General Guidelines for Victim and Witness Assistance. The information requested will assist the FBI in providing you with assistance to which crime victims are entitled under federal law. You do not have to provide the requested information; however, failure to do so may hinder the FBI in providing you with crime victim assistance. The information collected on this form is protected by the Privacy Act of 1974, as amended, Title 5, United States Code section 552a, and is maintained in the FBI's Central Records System, DOJ/FBI-002, a description of which was published in the Federal Register at 63 Fed. Reg. 8671 (Feb. 20, 1998) and which may be viewed at www.justice.gov/opcl/doj-systems-records#doj

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
2	Chicago	Illinois	United States	Sister	Yes	Yes	Yes	No
3	Dresher	Pennsylvania	United States		No	Yes	Yes	No
4	Fountain Valley	California	United States	Dad	Yes	Yes	Yes	Yes
5	Alexandria	Virginia	United States	wife	No	Yes	Yes	No
6	Birmingham	-----N/A-----	United Kingdom	Sister	Yes	Yes	Yes	Yes
7	Hamburg	New York	United States	brither	No	No	No	No
8	Hamburg	New York	United States	Brother	Yes	Yes	Yes	Yes
9	Birmingham	-----N/A-----	United Kingdom	Auntie	Yes	Yes	Yes	Yes
10	SCOTLAND	-----N/A-----	United Kingdom	SELF	No	Yes	Yes	Yes
11	DUMFRIES	-----N/A-----	United Kingdom	Granddaughter	No	Yes	Yes	Yes
12	wyndmoor	Pennsylvania	United States	sister	Yes	Yes	Yes	Yes
13	Washington	Pennsylvania	United States	Sister	Yes	Yes	Yes	Yes
14	Maricopa	Arizona	United States	Sister	Yes	Yes	Yes	Yes
15	New York	New York	United States	Brother	Yes	Yes	Yes	Yes
16	Hoboken	New Jersey	United States	Son	No	Yes	Yes	No
17	Glendale	California	United States	Brother	No	Yes	Yes	No
18	Denville	-----N/A-----	-----N/A-----	Wife	No	Yes	Yes	No
19	Saratoga	California	United States	Father	No	Yes	Yes	Yes
20	Moffat	-----N/A-----	United Kingdom	Self (firefighter)	No	No	Yes	No
21	Mountain Lakes	New Jersey	United States	Sibling	No	Yes	Yes	Yes
22	Big Pine Key	Florida	United States	Granddaughter (paternal)	Yes	Yes	Yes	Yes
23	Wayne	Pennsylvania	United States	daughter	Yes	Yes	Yes	Yes
24	Lockerbie	-----N/A-----	United Kingdom	Self	No	No	Yes	No
25	Ter apel	-----N/A-----	Netherlands	niece to my uncle / Aunt and a cousin to the kids	Yes	Yes	Yes	Yes
26	Dumfries	-----N/A-----	United Kingdom	self	No	No	No	No

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
27	MT PROSPECT	Illinois	United States	I AM HER DAUGHTER-IN-LAW	Yes	Yes	Yes	No
28	MOUNT PROSPECT	Illinois	United States	I AM HER SON	Yes	Yes	Yes	No
29	Arlington	Virginia	United States	He is my maternal uncle.	Yes	Yes	Yes	No
30	Jefferson City	Tennessee	United States	brother	No	Yes	Yes	No
31	Winchester	Massachusetts	United States	Brother	No	Yes	Yes	No
32	New York	New York	United States	Fiancee	Yes	Yes	Yes	Yes
33	Westwood	Massachusetts	United States	Sister	No	Yes	Yes	No
34	Memphis	Tennessee	United States	Wife	Yes	Yes	Yes	Yes
35	Dumfries	-----N/A-----	United Kingdom	Self	No	Yes	Yes	Yes
36	Battle Creek	Michigan	United States	Sister	Yes	Yes	Yes	Yes
37	Lockerbie	-----N/A-----	United Kingdom	Self	No	Yes	No	No
38	Lockerbie	-----N/A-----	United Kingdom	Self	No	Yes	No	No
39	Lockerbie	-----N/A-----	-----N/A-----	Self	No	Yes	Yes	No
40	Miami	Florida	United States	spouse	Yes	Yes	Yes	No
41	Annapolis	Maryland	United States	I am [REDACTED] aunt	Yes	Yes	Yes	No
42	Kirkbride	-----N/A-----	United Kingdom		No	Yes	No	No
43	Dover	Massachusetts	-----N/A-----	Spouse	Yes	Yes	Yes	No
44	QUEENSBURY, NY	New York	United States	sister	No	Yes	Yes	No
45	Hackettstown	New Jersey	United States	Sister	No	Yes	Yes	No
46	Scottsdale	Arizona	United States	Husband	No	Yes	Yes	Yes

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
47	Boston	Massachusetts	United States	Mother in-law	No	Yes	Yes	Yes
48	Towaco	New Jersey	United States	wife/spouse	Yes	Yes	Yes	No
49	Minneapolis	Minnesota	United States	Wife	Yes	Yes	Yes	Yes
50	DETROIT	Michigan	-----N/A-----	SISTER	No	Yes	Yes	No
51	Bendigo	-----N/A-----	Australia	Partner	No	Yes	Yes	No
52	Janesville	Wisconsin	United States	friend and colleague of her parents	No	Yes	Yes	Yes
53	Saratoga	California	United States	Grandfather	No	Yes	Yes	Yes
54	Boston	-----N/A-----	-----N/A-----	Daughter	No	No	Yes	Yes
55	Spokane	Washington	United States	Uncle	No	Yes	No	No
56	Kailua	Hawaii	-----N/A-----	I am his nephew	Yes	Yes	Yes	Yes
57	Lancaster	-----N/A-----	United Kingdom	Father	No	Yes	Yes	Yes
58	Chester	-----N/A-----	United Kingdom	Niece	Yes	No	No	No
59	Kingsville	Maryland	United States	Daughter, Granddaughter, Niece	Yes	Yes	Yes	Yes
60	Edina	Minnesota	United States	I'm [REDACTED] daughter	Yes	Yes	Yes	Yes
61	Camillus	New York	United States	Sister, Brother-in-law	Yes	Yes	Yes	Yes
62	Seattle	Washington	United States	Son of victim	Yes	Yes	Yes	No
63	Nashua	New Hampshire	United States	Sister	Yes	Yes	No	Yes
64	Aurora	Colorado	United States	My students at [REDACTED] were related to above.	Yes	Yes	Yes	No
65	Brooklyn	New York	-----N/A-----	Spouse	Yes	Yes	Yes	Yes
66	Towaco	New Jersey	United States	wife	Yes	Yes	Yes	No
67	Camillus	New York	United States	Sister to [REDACTED], Sister-in-law to [REDACTED]	Yes	Yes	Yes	Yes
68	Stamford	Vermont	United States		Yes	Yes	Yes	Yes
69	Cranston	Rhode Island	United States	sister	Yes	Yes	Yes	Yes
70	Dedham	-----N/A-----	-----N/A-----	Sister	No	Yes	Yes	Yes
71	Plattsburgh	New York	United States	parent/mother	No	Yes	Yes	No

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
72	Twickenham	-----N/A-----	United Kingdom	Sister	No	Yes	No	Yes
73	Oxford	-----N/A-----	United Kingdom	Paternal aunt and first cousin	No	Yes	Yes	No
74	Birmingham	-----N/A-----	-----N/A-----	Sister	Yes	Yes	Yes	Yes
75	MT PROSPECT	Illinois	United States	I AM HER GRANDDAUGHTER	Yes	Yes	Yes	No
76	Riverside	California	United States	Grandfather, Grandmother, Aunt, cousin, cousin	Yes	Yes	Yes	Yes
77	Dalkeith, Midlothian	-----N/A-----	United Kingdom	Brother of [REDACTED]	No	Yes	Yes	Yes
78	Twynholm	-----N/A-----	United Kingdom	Self	No	Yes	Yes	Yes
79	Balfron	-----N/A-----	United Kingdom	Self	No	No	Yes	Yes
80	Cleveland	Ohio	United States	[REDACTED] is my aunt	No	Yes	Yes	No
81	Dumfries	-----N/A-----	-----N/A-----	Self	No	Yes	Yes	No
82	Plainfield	Connecticut	United States	Sister	No	No	No	No
83	River Vale	New Jersey	United States	Brother	Yes	Yes	No	No
84	Old tappan	New Jersey	United States	Wife	Yes	Yes	Yes	Yes
85	Old tappan	New Jersey	United States	Daughter	No	Yes	Yes	No
86	Peebles	-----N/A-----	-----N/A-----	Self	No	Yes	No	No
87	Old Lyme	Connecticut	United States	brother and brother-in-law	Yes	Yes	Yes	Yes
88	East Bridgewater	Massachusetts	United States	father	Yes	Yes	Yes	Yes
89	Webster	New York	United States	Sister	Yes	Yes	Yes	Yes
90	Reading	-----N/A-----	United Kingdom	Uncle, Auntie, Cousin, Cousin	Yes	Yes	Yes	Yes
91	Saint Augustine	Florida	United States	Cousin	No	Yes	Yes	No
92	Ypsilanti	Michigan	United States	L [REDACTED] was my father	Yes	Yes	Yes	No
93	Grand Rapids	Michigan	United States	Son	No	Yes	Yes	No
94	Northville	Michigan	United States	Brother	No	Yes	No	No

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
95	Wylam	-----N/A-----	United Kingdom	Brother	No	Yes	No	Yes
96	Washington	District of Columbia	United States	Child	Yes	Yes	Yes	No
97	Chevy Chase	Maryland	United States	spouse	Yes	Yes		No
98	Dumfries	-----N/A-----	United Kingdom	Self	No	Yes	No	Yes
99	Detroit	Michigan	United States	Brother	Yes	Yes	Yes	Yes
100	W. Bloomfield	Michigan	United States	Sister	Yes	Yes	Yes	Yes
101	Nashua	New Hampshire	United States	Son	No	Yes	Yes	No
102	Halifax	-----N/A-----	United Kingdom	Brother	No	Yes	Yes	Yes
103	Shrewsbury	Massachusetts	United States	Sister	Yes	Yes	Yes	Yes
104	Lutterworth	-----N/A-----	United Kingdom	Self	No	Yes	Yes	Yes
105	Floyd,	Virginia	United States	Brother	No	Yes	Yes	No
106	Medford	Massachusetts	-----N/A-----	Son	Yes	Yes	Yes	No
107	Glasgow uk	-----N/A-----	-----N/A-----	Self	No	Yes	Yes	No
108	Catterick Garrison	-----N/A-----	United Kingdom	self	No	Yes	Yes	No
109	Hamburg	New York	United States	Sister	No	Yes	Yes	Yes
110	Hamburg	New York	United States	Sister	Yes	Yes	Yes	Yes
111	Wylie	Texas	United States	Daughter and Sibling	Yes	Yes	No	Yes
112	Dumfries	-----N/A-----	United Kingdom	self	Yes	Yes	Yes	Yes

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
113	Keene	New Hampshire	United States	Spouse	No	Yes	No	No
114	Long Beach	California	United States	Brother in Law	Yes	Yes	Yes	Yes
115	Long Beach	California	United States	Sister	Yes	Yes	Yes	Yes
116	East Linton	-----N/A-----	-----N/A-----	Self.	No	Yes	Yes	No
117	Waynesville	Ohio	United States	sister in law	Yes	Yes	Yes	
118	Waynesville	Ohio	United States	sister	Yes	Yes	Yes	Yes
119	ASHBOURNE	-----N/A-----	United Kingdom	Self	No	No	No	No
120	Woodcliff Lake	New Jersey	United States	Wife	Yes	Yes	Yes	Yes
121	Waltham	Massachusetts	United States	Son in law	Yes	Yes	Yes	Yes
122	Waltham	Massachusetts	United States	child	Yes	Yes	Yes	Yes
123	Richland Hills	Texas	United States	Sister	Yes	Yes	Yes	Yes
124	Rockbridge Baths	Virginia	United States	Father	Yes	Yes	Yes	Yes
125	North Attleboro	Massachusetts	United States	Brother	No	Yes	Yes	No
126	Settle. BD249PE	-----N/A-----	United Kingdom	SELF	No	Yes	Yes	No
127	HOLMESFIELD / DRONFIELD	-----N/A-----	United Kingdom	BROTHER	No	Yes	No	No
128	SHEFFIELD	-----N/A-----	United Kingdom	Step Daughter - Father now deceased	Yes	Yes	Yes	Yes
129	Mystic	Connecticut	United States	Son	Yes	Yes	Yes	Yes
130	Mystic	Connecticut	United States	Son	Yes	Yes	Yes	Yes
131	Oceanport	New Jersey	United States	Sister	No	Yes	Yes	No
132	Bishopton	-----N/A-----	United Kingdom	Daughter	No	Yes	Yes	No
133	Buckie	-----N/A-----	United Kingdom	Spouse	No	Yes	Yes	No
134	Dunfermline	-----N/A-----	United Kingdom	Daughter	No	Yes	Yes	No
135	Carlisle	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
136	Oban	-----N/A-----	-----N/A-----		No	Yes	No	No
137	Aberdeenshire	-----N/A-----	United Kingdom	widow	No	No	No	No
138	Nevada	Texas	United States	Sister	Yes	Yes	Yes	Yes
139	Workington	-----N/A-----	United Kingdom	Self	No	Yes	No	No
140	Pacifica	California	United States	Father	No	No	No	No

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
141	Oceanside	California	United States	Sister	Yes	Yes	Yes	Yes
142	Dumfries	-----N/A-----	United Kingdom	Self	No	Yes	No	No
143	Lockerbie	-----N/A-----	-----N/A-----	Self	Yes	Yes	Yes	Yes
144	New York	New York	United States	child	Yes	Yes	Yes	Yes
145	Glens Falls	New York	United States	son	Yes	Yes	Yes	Yes
146	Seattle	Washington	United States	Child	No	Yes	Yes	No
147	Washington	District of Columbia	United States	I am his daughter.	Yes	Yes	Yes	Yes
148	Rancho Santa Margarita	California	United States	Mother	Yes	No	Yes	No
149	Lockerbie	-----N/A-----	United Kingdom	Self	Yes	Yes	Yes	Yes
150	Philadelphia	Pennsylvania	United States	██████ was my father	Yes	Yes	Yes	No
151	Jamestown	Rhode Island	United States	wife	Yes	Yes	Yes	No
152	Wyndmoor	Pennsylvania	United States	Niece	Yes	Yes	Yes	Yes
153	Waxhaw	North Carolina	United States	My 1st Cousin	No	Yes	Yes	Yes
154	Dundee	-----N/A-----	United Kingdom	Mother	No	Yes	Yes	Yes
155	Dundee	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
156	Marcy	New York	United States	Sister	Yes	Yes	Yes	Yes
157	Kells	-----N/A-----	Ireland	Brother	No	Yes	Yes	No
158	Woking	-----N/A-----	United Kingdom	Sister	No	Yes	Yes	No
159	Lockerbie	-----N/A-----	United Kingdom	Self	No	Yes	Yes	Yes
160	Peebles	-----N/A-----	-----N/A-----	NA - note as above	Yes	Yes	No	No

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
161	Meriden	Connecticut	United States	Family friend, owner of suitcase she used	No	Yes	Yes	No
162	Fauldhouse	-----N/A-----	United Kingdom	Cousin	Yes	Yes	Yes	Yes
163	Ellon	-----N/A-----	United Kingdom	Self	No	Yes	Yes	Yes
164	Goxhill	-----N/A-----	United Kingdom	Self	No	No	No	No
165	Ave Maria	Florida	United States	Sister	No	No	No	No
166	Portland	Oregon	United States	Birth mother	Yes	Yes	Yes	Yes
167	zeist	-----N/A-----	Netherlands	I was the [REDACTED] Liaison Officer on site	Yes	Yes	No	No
168	Chirnside, Berwickshire	-----N/A-----	United Kingdom	Self	No	Yes	Yes	Yes
169	London	-----N/A-----	United Kingdom	Aunt	No	Yes	No	No
170	Edinburgh	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
171	Middlesbrough	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
172	Brampton	-----N/A-----	United Kingdom	self	No	Yes	No	No
173	Brighton	-----N/A-----	-----N/A-----	Spouse	Yes	Yes	Yes	Yes
174	Edinburgh	-----N/A-----	United Kingdom	Self	Yes	Yes	Yes	Yes
175	Hawick	-----N/A-----	United Kingdom	Self	No	Yes	No	No
176	Whitehouse Station	New Jersey	United States	Step father	Yes	Yes	No	Yes
177	Airdrie	-----N/A-----	United Kingdom	Self	No	Yes	No	No
178	Cochrane	-----N/A-----	Canada	Self	No	Yes	Yes	No
179	Tiburon	California	-----N/A-----	wife	No	No	No	No
180	Musselburgh	-----N/A-----	-----N/A-----	Self	No	Yes	Yes	No
181	Valencia	California	-----N/A-----	Sister	No	Yes	Yes	Yes
182	Lockerbie	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
183	Gretna	Alaska	-----N/A-----	Self	No	Yes	Yes	Yes
184	Lockerbie	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
185	London	-----N/A-----	United Kingdom	Sister	No	Yes	No	No

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
186	Dumfries	-----N/A-----	United Kingdom	self	No	Yes	No	No
187	Dolton	Illinois	United States	Brother	Yes	Yes	Yes	Yes
188	Stone Mountain	Georgia	United States	Sister	No	Yes	Yes	No
189	Perry Hall	Maryland	United States	Husband	Yes	Yes	Yes	No
190	Edinburgh	-----N/A-----	United Kingdom		No	Yes	Yes	Yes
191	Knoxville	Tennessee	United States	cousin	No	Yes	Yes	No
192	Lockerbie	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
193	Broseley Wood	-----N/A-----	United Kingdom		No	No	No	No
194	Edinburgh	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
195	Darnick	-----N/A-----	United Kingdom	was my flatmate, was his fiance	No	No	Yes	No
				Sister, sister-in-law, aunt,				
196	East Lansing	Michigan	United States	aunt	Yes	Yes	Yes	No
197	Stony Brook	New York	United States	Niece	Yes	Yes	Yes	No
198	Greensburg	Pennsylvania	United States	Mother	No	Yes	Yes	No
199	Birmingham	-----N/A-----	-----N/A-----	Auntie	Yes	Yes	Yes	Yes
200	Greensburg	Pennsylvania	United States	Father	Yes	Yes	Yes	No
201	Greensburg	Pennsylvania	United States	Father	Yes	Yes	Yes	No
202	Kingsbury	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
203	DUMFRIES	-----N/A-----	United Kingdom	Self	No	Yes	Yes	Yes
204	Eastriggs	-----N/A-----	United Kingdom		No	Yes	No	No
205	DUMFRIES	-----N/A-----	United Kingdom	Self	Yes	Yes	Yes	Yes
206	Lockerbie	-----N/A-----	United Kingdom	Father	No	Yes	Yes	No
207	Peabody	Massachusetts	United States	Father of	Yes	Yes	No	Yes
208	Athens	Georgia	United States	Cousin	No	Yes	Yes	No
209	Rose Valley	Pennsylvania	United States	Sister	No	Yes	Yes	No

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
210	Lockerbie	-----N/A-----	-----N/A-----	Self	No	Yes	No	No
211	Lockerbie	-----N/A-----	United Kingdom	Self	No	Yes	Yes	Yes
212	Des Moines	Washington	United States	2nd Cousin	No	Yes	Yes	Yes
213	Seattle	Washington	United States	Daughter in Law	Yes	Yes	Yes	Yes
214	Brighton	-----N/A-----	-----N/A-----	Spousr	Yes	Yes	Yes	Yes
215	San Rafael	California	United States	Daughter	No	Yes	Yes	No
216	Praha	-----N/A-----	Czechia	She was my sister	No	Yes	No	No
217	Brooklyn	New York	United States	Daughter	Yes	Yes	Yes	Yes
218	Ballymena	-----N/A-----	United Kingdom	Self	Yes	Yes	Yes	No
219	Inverurie	-----N/A-----	-----N/A-----	Self	No	Yes	Yes	Yes
220	Evanston	Illinois	United States	Brother	Yes	Yes	No	No
221	Glasgow	-----N/A-----	United Kingdom	Self	Yes	Yes	Yes	Yes
222	Kings lynn	-----N/A-----	United Kingdom	Uncle Aunt Cousin	Yes	Yes	Yes	Yes
223	Landenberg	Pennsylvania	-----N/A-----	Sister	No	Yes	Yes	No
224	Dumbarton	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
225	Weston-Super-Mare	-----N/A-----	United Kingdom	self	Yes	Yes	Yes	Yes
226	Scottsdale	Arizona	United States	Son	No	Yes	Yes	No
227	Dumfries	-----N/A-----	United Kingdom	Self	Yes	Yes	Yes	Yes
228	Sekirk	-----N/A-----	United Kingdom	Self	No	Yes	Yes	Yes
229	Haddonfield	New Jersey	United States	Sister	No	Yes	Yes	Yes
230	Lockerbie	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
231	Perthshire	-----N/A-----	-----N/A-----	Self	Yes	Yes	Yes	Yes
232	bridgewater	New Jersey	United States	brother	No	Yes	Yes	Yes

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
233	DUMFRIES	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
234	Pitlochry	-----N/A-----	United Kingdom	Self	Yes	Yes	Yes	Yes
235	Dumfries	-----N/A-----	-----N/A-----	Self	No	No	No	Yes
236	Lincoln	-----N/A-----	United Kingdom	Self	No	Yes	Yes	Yes
237	Dumfries	-----N/A-----	United Kingdom	Self	No	Yes	Yes	Yes
238	Edinburgh	-----N/A-----	-----N/A-----	Self	Yes	Yes	No	Yes
239	Lockerbie	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
240	Thaxton	Virginia	United States	Self	Yes	Yes	Yes	Yes
241	Huntingdon	-----N/A-----	United Kingdom	Self	Yes	Yes	Yes	Yes
242	Edinburgh	-----N/A-----	United Kingdom	Self	No	Yes	Yes	Yes
243	MARCY	New York	United States	Daughter	No	Yes	Yes	No
244	Honolulu	Hawaii	United States	My stepdaughter	No	Yes	No	No
245	Honolulu	Hawaii	United States	My daughter, my only child	No	Yes	Yes	No
246	hove	-----N/A-----	-----N/A-----		Yes	Yes	Yes	No
247	Maputo	-----N/A-----	Mozambique	Self	No	Yes	No	Yes
248	Lockerbie	-----N/A-----	United Kingdom	Aunt and uncle	No	Yes	Yes	No
249	Lockerbie	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
250	Cherry Hill	New Jersey	United States	I am his Mother	Yes	Yes	Yes	Yes
251	Cherry Hill	New Jersey	United States	Father-Son	Yes	Yes	Yes	No
252	Derbyshire	-----N/A-----	United Kingdom	Self	No	Yes	Yes	Yes
253	Hawick	-----N/A-----	United Kingdom	Self	Yes	Yes	Yes	Yes
254	Motherwell	-----N/A-----	-----N/A-----	Self	Yes	Yes	Yes	Yes
255	Reidsville	North Carolina	United States	Self	No	Yes	Yes	No
256	Moffat							
256	Dumfriesshire	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
257	Summit	New Jersey	United States	Cousin	No	No	No	No
258	Swynerton	-----N/A-----	United Kingdom	Self	Yes	Yes	Yes	Yes
259	Mt Juliet	Tennessee	United States	step-brother	No	No	Yes	No
260	Brooklyn	New York	United States	Nephew	Yes	Yes	No	Yes
261	BOSTON	Massachusetts	United States	Sister	Yes	Yes	Yes	Yes
				liaison to families & secretary for				
262	Jamesville	New York	-----N/A-----		No	Yes	Yes	No
263	Dumfries Scotland	-----N/A-----	-----N/A-----	SELF	No	Yes	Yes	No
264	W BLOOMFIELD	Michigan	United States	Sister	Yes	Yes	Yes	Yes
265	Newcastle	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
266	Westlake Village	California	United States	Nephew	No	Yes	No	No
267	Lee-on-the-Solent	-----N/A-----	United Kingdom	Self	Yes	Yes	Yes	Yes
268	Doylestown	Pennsylvania	United States	Sister	No	Yes	Yes	No
269	Ann Arbor	Michigan	United States	Sister	No	Yes	No	No
270	Lockerbie	-----N/A-----	United Kingdom	Self	Yes	Yes	Yes	Yes
271	Dumfries	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
272	MEMPHIS	Tennessee	United States	daughter	No	Yes	Yes	No
273	Seattle	Washington	United States	son	Yes	Yes	Yes	Yes
274	Kalamazoo	Michigan	United States	Sister	Yes	Yes	Yes	Yes
275	Chester	-----N/A-----	-----N/A-----	Self	No	Yes	Yes	Yes
276	Oban	-----N/A-----	United Kingdom	self	No	Yes	Yes	Yes
277	Greensburg	Pennsylvania	-----N/A-----	brother	Yes	Yes	Yes	Yes
278	Greensburg	Pennsylvania	United States	daughter	No	Yes	Yes	No
279	wakefield	Massachusetts	United States	sister		Yes	Yes	Yes
280	Birmingham	-----N/A-----	United Kingdom	Auntie	Yes	Yes	Yes	Yes
281	Lockerbie	-----N/A-----	-----N/A-----	self	No	Yes	Yes	Yes
282	New York	New York	United States	Spouse	No	Yes	No	No

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
283	Edinburgh	-----N/A-----	-----N/A-----	[REDACTED] was my fathers neice.	No	Yes	Yes	Yes
284	Kirkland	Washington	United States	Step-daughter	Yes	Yes	Yes	Yes
285	Quincy	Massachusetts	United States	DAUGHTER	No	Yes	Yes	No
286	Chatham	New York	United States	Step brother	No	Yes	Yes	Yes
287	Darien	Connecticut	United States	Daughter of [REDACTED]	Yes	Yes	Yes	Yes
288	Darien	Connecticut	United States	Husband of his daughter ([REDACTED] r)	Yes	Yes	Yes	Yes
289	Sandhurst	-----N/A-----	-----N/A-----	[REDACTED] my Brother, [REDACTED] sister in law. Nieces	No	Yes	Yes	Yes
290	MANCHESTER	-----N/A-----	United Kingdom	Cousin	No	Yes	No	No
291	Lucas	Texas	United States	Son	No	Yes	Yes	No
292	Montvale	New Jersey	United States	Wife	No	Yes	Yes	No
293	Pennsylvania Furnace	Pennsylvania	United States	Next of Kin (niece)	Yes	Yes	Yes	Yes
294	Strongsville	Ohio	United States	Best friend, best man at wedding, virtual brother	Yes	Yes	Yes	Yes
295	Kirkconnel	-----N/A-----	-----N/A-----	Self	Yes	Yes	Yes	Yes
296	Lockerbie	-----N/A-----	-----N/A-----	Self	No	Yes	Yes	No
297		-----N/A-----	United Kingdom	Self	No	Yes	Yes	No

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
298	Columbia	South Carolina	United States	Wife	Yes	Yes	Yes	Yes
299	Columbia	South Carolina	United States	Wife	Yes	Yes	Yes	Yes
300	MAI laga	-----N/A-----	Spain	Daughter	No	Yes	Yes	No
301	Stoke on Trent	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
302	Jacksonville	Florida	-----N/A-----	First cousin. My fathers nephew	Yes	Yes	Yes	No
303	Giffnock	-----N/A-----	United Kingdom	Self	No	Yes	No	No
304	Dumfries	-----N/A-----	United Kingdom	Self	No	Yes	Yes	Yes
305	Pembroke	Massachusetts	United States	My brother	No	Yes	Yes	Yes
306	Lochmaben	-----N/A-----	United Kingdom	self	No	Yes	No	No
307	Wakefield	-----N/A-----	United Kingdom	Self	No	Yes	Yes	No
308	Oceanport	New Jersey	United States	Mother	No	Yes	Yes	No
309	Springfield	New Jersey	United States	First cousin once removed	No	Yes	Yes	No
310	Neptune	New Jersey	United States	sister	No	Yes		No
311	Oceanport	New Jersey	United States	father	No	Yes	Yes	No
312	Pittsburgh	Pennsylvania	United States	son	No	Yes	Yes	No
313	Great Neck	New York	United States	spouse	Yes	Yes	Yes	Yes
314	Great Neck	New York	-----N/A-----	SPOUSE	Yes	Yes	Yes	Yes
315	Wellesley	Massachusetts	United States	Sister	Yes	Yes	Yes	Yes
316	Abington	Massachusetts	United States	wife	Yes	Yes	Yes	
317	Sarasota	Florida	United States	Father, brother, sister	Yes	Yes		Yes
318	Mount Laurel	New Jersey	United States	My uncle	No	Yes	Yes	No
319	Mount Laurel	New Jersey	United States	Brother in Law	No	Yes	Yes	Yes

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
320	Mt. Laurel	New Jersey	United States	Sister	Yes	Yes	Yes	No
321	Dunfermline	-----N/A-----	United Kingdom	Self	No	Yes	Yes	Yes
322	Dalbeattie	-----N/A-----	United Kingdom	Self	Yes	Yes	Yes	Yes
323	Pittsburgh	Pennsylvania	United States	Child	Yes	Yes	No	Yes
324	Burghead	-----N/A-----	United Kingdom	Self rescue team leader			No	No
325	Carlisle England	-----N/A-----	-----N/A-----	Self	No	Yes	Yes	Yes
326	Westland	Michigan	United States	sister	Yes	Yes	Yes	No
327	Westland	Michigan	United States	sister	Yes	Yes	Yes	No
328	Dumfries	Scotland	Scotland					
329	Lockerbie	Dumfries and Galloway	United Kingdom					
330	Lockerbie	Dumfries and Galloway	United Kingdom					
331	Lockerbie	Dumfries and Galloway	Scotland					
332	Jenkintown	PA	United States	Daughter				
333	Dunnet	Caithness	Scotland	Cousin				
334	Long Lake	MN	USA	Sibling				
335	Brooklyn	NY	USA	Sibling				
336	Santa Barbara	CA	United States	Daughter				
337	Palm Beach Gardens	Florida	USA	Step-parent				
338	Lockerbie	Dumfriesshire	Scotland					
339	Berkeley	CA	USA	Spouse				
340	LOCKERBIE	Dumfries & Galloway	Scotland					
341	Hamburg	New York	United States	Niece/nephew				
342	Templand, Lockerbie	Dumfriesshire, Scotland	Uk					

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
343	Moffat	Dumfries and Galloway	United Kingdom	Aunt				
344	Wellesley	MA	USA	Parent				
345	Sausalito	California	USA	Son				
346	atlanta	ga	usa	Next-of-kin				
347	Bluffdale	Utah	USA	Sibling				
348	Dumfries	Scotland	United Kingdom					
349	Lockerbie	Dumfriesshire	United Kingdom					
350	Chevy Chase	MD	USA	Sibling				
351	Bethesda	Maryland	United States	Sibling				
352	Aspen	CO	United States	Son				
353	Marlton	NJ	USA	Sibling-in-law				
354	Petaluma	CA	United States	Uncle				
355	Pittsburgh	PA	USA	Spouse				
356	Dumfries and galloway	Dumfriesshire	Scotland	Aunt				
357	East Kilbride	Glasgow	Scotland	Niece/nephew				
358	Walnut Creek	CA	United States	Niece/nephew				
359	Denholm	Scottish Borders	United Kingdom					
360	Battle Creek	MICHIGAN	United States	Parent				
361	Centennial	CO	United States	Sibling				
362	Coral Gables	FL	United States	Sibling				
363	Sarasota	Florida	USA	Parent				
364	Sarasota	Florida	USA	Sibling				
365	Eastover	SC	USA	Fianc��/fianc��e				
366	Wildwood	Missouri	USA	Spouse				
367	Blairstown	New Jersey	USA	Daughter				
368	Marlborough	Wiltshire	United Kingdom	Niece/nephew				
369	Saratoga	Californa	United States of America	Grandparent				
370	Saratoga	CA	United States	Grandparent				
371	South Lyon	MI	United States	Niece/nephew				

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
372	San Francisco	California	United States of America	Next-of-kin				
373	Birmingham	West Midlands and	United Kingdom	Niece/nephew				
374	Birmingham	West Midlands	United Kingdom	Niece/nephew				
375	st.Andrews	fife	scotland	Guardian				
376	Montauk	NY	United States	Parent				
377	Quogue	NY	USA	Sibling				
378	Peebles	Scotland	Scotland					
379	Lebanon	Ohio	United States	Sibling				
380	Murrells Inlet	SC	USA	Sibling				
381	Lockerbie	Dumfriesshire, Scotland	Scotland					
382	Dover	Kent	Great Britain - United Kingdom	Guardian				
383	Stranraer	United Kingdom	Scotland					
384	Phoenix	AZ	United States	Daughter				
385	lawrence	new york	United States	Son				
386	Hamburg	NY	United States	Sibling				
387	East Northport	NY	USA	Son				
388	East Northport	NY	USA	Spouse				
389	Lockerbie	Dumfriesshire	Scotland					
390	Rockville Crntr	New York	USA	Sibling				
391	Katonah	New York	United States of America	Parent				
392	Suwanee	Georgia	Gwinnett	Spouse				
393	WALTHAM	Massachusetts	United States	Sibling				
394	Priory	St.Ann	Jamaica	Daughter				
395	Chicopee	MA	United States	Sibling-in-law				
396	Scotland	United Kingdom	United Kingdom					
397	Brooklyn	New York	US	Spouse				
398	Brooklyn	NY	USA	Sibling				

	A	B	C	D	E	F	G	H
1	City	State	Country	Relationship to Victim	Q3	Q4	Q5	Q6
399	Lockerbie	Dumfriesshire	United Kingdom					
400	Dayton	Ohio	USA	Spouse				
401	Orange	California	United States	Sibling				
402	Orange	California	United States	Daughter				
403	VERO BEACH	Florida	United States	Cousin				
404	Stamford	CT	USA	Parent				
405	san francisco	CA	usa	Sibling				
406	Carmel	CA	USA	Sibling				
407	West Lebanon	New Hampshire	USA	Son				
408	lockerbie	dumfries and galloway	scotland					
409	Remsen	NY	United States	Sibling				
410	Chipping Campden	Gloucestershire UK	UK	Parent				
411	Chipping Campden	Gloucestershire (UK)	United Kingdom	Parent				
412	Clemmons	NC	USA	Sibling				
413	Detroit	Michigan	United States	Sibling				
414	Fairfax	CA	United States	Sibling				
415	Mendocino	California	United States	Parent				
416	Lockerbie	Dumfries and Galloway.	Scotland					
417	West Nyack	NY	United States	Parent				
418	Fairfield	CT	USA	Sibling				

EXHIBIT 1-4

Question Number 7: Medical/Physical Hardship Responses from Victims

Do you have physical/medical hardships or limitations that would make it difficult for you to travel to/from a courthouse, embassy, or police station to watch a closed-circuit broadcast of the trial and/or other court proceedings?

Responses from the victims included:

“I am a solo parent of three children and paying for childcare for them to go view trial is not in my budget. Additionally, the added time off work to travel would be too much lost income.”

“I am being treated for stage 4 metastatic colon cancer at Memorial Sloan Kettering in NYC and cannot travel far from there or my home in New Jersey.”

“No, I can drive and walk. It would be nice though if I could watch [on] my TV or computer.”

“No, but my wife is recovering from a lymphoma and other ailments.”

“Work may make it difficult to travel. I also do not have a car, so travel outside of NYC would require additional cost.”

“Travel is difficult for me due to my arthritis.”

“I live in Honolulu, Hawaii and I am 89 years old.” (Two family members)

“Yes. I'm 91 years old. In September...2024...I will be 92. I'm disabled (wheelchair bound) and can no longer travel.”

“[No] “I use a rollator...”

“I have 2 young children (2 and 4 years old respectively), and would unlikely be able to secure child care during proceedings.”

“I LIVE IN THE UK.”

“I suffer from C-PTSD [Complex-PTSD] and have a hearing impairment.”

“No, I do not have any physical or medical hardship.”

“Stage 4 cancer, limited mobility.”

“I intend to attend in person.”

“50 miles travel too far.”

“I have childcare/transportation responsibilities that would make it very difficult, and may not allow,

EXHIBIT 1-4

for me to travel to another location to watch a closed-circuit broadcast.”

“No, due to work commitments.”

“Yes, we all have PTSD and shouldn’t be forced to travel to a public location to view the trial we should be able to watch the trial and grieve privately from our homes regardless of our proximity to D.C.”

“Yes, I am totally bed-bound.”

“It would be difficult.”

“I have small children.”

EXHIBIT 1-5

Question Number 8: Logistical and/or Other Physical Difficulty Posing Problems of Travel to Hard Sites to Observe Court

Do you have any reason to believe that you would be unable to physically travel to or from home to a courthouse, embassy, or police station to watch a closed-circuit television broadcast of the trial and/or other court proceedings if viewing were to be made available in that type of venue?

Responses include:

“Yes, my child is medically complex and the COVID risk for that child from an in-person viewing is too high.”

“No, but virtual will mean not taking off work, so it will allow me to actually follow all of it, as opposed to only occasionally being able to attend. It’s a massive difference for me.”

“No, I don’t have problems traveling but of course it would be much better for me to see it on my TV or computer.”

Would need approval from work...”

I would be unable to travel.”

“Travel is difficult for me due to my arthritis.”

“I’m 89 and unable to travel. My husband.... will be 92...in September...He’s disabled, and I’m his caregiver.”

“Yes, my age and disabilities make travel impossible for me.”

“Yes, unable because of time constraints and other commitments.”

“Yes, I am physically/medically handicapped and can only drive distances less than 15 miles, round trip, daily.”

“No I do not have physical problems, but I would prefer to be in person in the court in the states but if it is the only option to watch the trial here in the Netherlands then I accept that.”

“I do not have a car.”

“It’s possible that we would not be able to travel based on age, ability and medical conditions at the time of the trial. Today, we can both walk, but a fall can change that ability in a second.”

“Medical condition, but, if necessary, I would make the effort to travel.”

“Yes, depending on the distance...but I can travel.”

“I suffer from anxiety.”

“I can travel but have Parkinson’s disease and chronic pain from spinal degenerative disc disease which may limit how long...”

“Yes, unfortunately, due to assisting an RAF pathologist at the ice-rink changing room in a number of post-mortems, I have severe PTSD and would not be able to watch [the trial] in the company of others.”

“Travel gets harder with age. It's possible we could not travel based on age, ability and medical condition dependent on where the closed-circuit viewing was available.”

“I would not travel to a remote venue.”

“I also would note that the ICC provided a live stream of video during their trial, and I was very happy to follow along two decades ago.”

“I LIVE IN THE UK.”

“I do not have a medical or physical hardship.”

“I have a young son and my wife and I are employed full time. I am unable to travel to a remote site so it is necessary for me to have online access. It would be difficult for me to attend the entire trial in person or every day in a remote location. I think it is important for the family of every victim to have remote access. I really can’t leave my home for more than a couple of hours.”

“Not at this time.”

“50 miles travel [would be] too far, have a child to collect from primary school.”

“I have childcare/transportation responsibilities that would make it very difficult, and may not allow, for me to travel to another location to watch a closed-circuit broadcast.”

“I do not wish to travel anywhere to watch a closed-circuit broadcast.”

“Yes, I have little children...[difficult]”