IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
v.	)	**Case No. 22CR392 (DLF)**
	)	
ABU AGILA MOHAMMAD	)	
MAS'UD KHEIR AL-MARIMI,	)	
Defendant.	)	

NOTICE OF UPDATED EXPERT NOTICE

COMES NOW Mr. Al-Marimi, by counsel, Laura Koenig, Whitney E.C. Minter, and Brooke Sealy Rupert, Assistant Federal Public Defenders, and hereby advises the Court that an updated expert notice for Anthony May was provided to the government on April 17, 2026.

Respectfully submitted
By Counsel,
Geremy C. Kamens,
Federal Public Defender

By: /s/

Whitney E.C. Minter
Va. Bar # 47193
Brooke Sealy Rupert
Va. Bar #79729
Assistant Federal Public Defender
Attorney for Mr. Al-Marimi
1650 King Street, Suite 500
Alexandria, Virginia 22314
(703) 600-0855 (telephone)
(703) 600-0880 (facsimile)
Whitney_Minter@fd.org (email)

Laura Koenig
Va. Bar #86840
Assistant Federal Public Defender
Attorney for Mr. Al-Marimi
701 E. Broad Street, Suite 3600
Richmond, Virginia 23219
(804) 343-0800 (telephone)
(804) 648-5033 (facsimile)
Laura_Koenig@fd.org (email)

FEDERAL PUBLIC DEFENDER
EASTERN DISTRICT OF VIRGINIA
1650 KING STREET, SUITE 500
ALEXANDRIA, VIRGINIA 22314
TELEPHONE: (703) 600-0800
FAX: (703) 600-0880

Geremy C. Kamens
Federal Public Defender

Whitney E.C. Minter
Assistant Federal Public Defender
Direct Dial: (703) 600-0855
whitney_minter@fd.org
Fax: (703) 991-5592

April 17, 2026

Via E-mail

Brittany Keil, Esq.
Erik Kenerson, Esq.
Conor Mulroe, Esq.
Assistant United States Attorneys
United States Attorney's Office – DDC
601 D Street, NW
Washington, DC 20530

Re: *United States v. Abu Agila Mohammad Mas'ud Kheir Al-Marimi*
Case No. 1:22CR392

Dear Counsel:

This letter is to formally advise you that, on behalf of Mr. Al-Marimi, we expect to call Mr. Anthony May as an expert witness at trial. His attached *curriculum vitae* sets forth his extensive credentials and lists his publications and examples of other cases in which he has testified in the past.

Mr. May has been qualified as an expert witness in United States courts in criminal violations of federal and state explosives laws in device design characteristics, functioning, and explosion effects. He has worked with the State Department conducting Anti-terrorism Assessments for foreign governments and has investigated explosions and fire scenes to determine cause and origins.

During his nineteen years in the United States Army, Mr. May served as an Explosive Ordnance Disposal (EOD) Response Team member. He was responsible for

the accurate identification, rendering safe and disposal of military ordnance, commercial explosives, chemical and nuclear weapons, and improvised explosive devices. He received extensive hands-on experience with explosives and explosives effects, and other hazardous material, while mitigating the hazards presented by these materials. Mr. May obtained the rank of First Sergeant, ultimately responsible for managing, coordinating, and supervising EOD operations.

Mr. May worked as an Explosives Enforcement Officer for the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) for twenty years. He provided technical support to ATF Special Agents and other law enforcement officers on matters related to explosives and explosives effects of improvised explosive devices (IED), and post blast investigations. Mr. May was responsible for investigating violations of federal explosives laws according to state and federal regulations. He examined and evaluated reports, materials and exhibits related to explosive incidents to determine their classification under federal law. He prepared final case statements upon completion of full investigations and lab analysis. His technical support included on-site investigative assistance for post-blast investigations to determine the cause and seat of the blast, examination of recovered evidence, and the identification, reconstruction, and testing of homemade bombs and other destructive devices; As a certified Hazardous Device Technician, Mr. May further conducted rendered safe procedures and coordinated safe disposal of explosives and explosive devices.

Mr. May further conducted safety and certification training classes for ATF employees and other federal, state and local law enforcement agencies throughout the United States. These classes train agents on identification and destruction of hazardous materials, post blast investigation procedures, bomb threat searches, collection of evidence, and explosive safety training related to explosive effects.

Mr. May assisted in the investigation of cause of the explosion of TWA Flight 800. He was responsible for examining physical wreckage to locate the explosion (seat of the blast) on the aircraft and what caused the explosion.

Mr. May was a member of ATF's National and International Response team for Explosive Post Blast and Fire Investigation. He was assigned to the US State Departments Anti-Terrorist Assessment Team tasked with evaluating a host country's ability to protect the US Embassy and US Citizens. He conducted Antiterrorism and Threat Assessments for the US State Department Embassies and Consulates throughout South America, Middle East, and North Africa.

Mr. May assisted in the investigation of the 1996 Atlanta Olympic Park bombing, which included working the post-blast scene collecting evidence recovered, and using the evidence to reconstruct the device used. He also participated in the investigation of Eric Rudolph, suspected of and convicted of the bombing of a Birmingham abortion clinic and two other locations in Atlanta.

Mr. May worked post-blast investigation and explosive exploitation in Baghdad, Iraq. He was assigned to a team responsible for examining the scenes of attacks on U.S. and Coalitions forces where explosives or improvised explosives devices where used. The team collected evidence of the devices to determine their construction and exploited the evidence to assist in safeguarding military operations.

Mr. May holds a degree in Security Management, a Master Explosives Ordnance Disposal Badge, and certifications in Hazardous Waste Management. While working with ATF he was a Certified Hazardous Device Technician and is a Certified International Post Blast Investigator with the International Association of Bomb Technicians and Investigators (IABTI).

We intend to call Mr. May as an expert witness primarily in response to the government's expert, Mr. Allen Feraday – including testimony and the RARDE report that the Government may offer as evidence at trial against Mr. Al-Marimi – however, his testimony could respond to any expert the government calls regarding forensic explosives analysis and their methodology to satisfy Daubert.

Specifically, Mr. May may testify to the following:

Training & Experience of Investigators

When responding to, and working on, the scene of an explosion, the investigator should have a working knowledge of a diverse set of disciplines related to this field of expertise. These include the ability to assess the incident to determine if, in fact, there has been an explosion; investigate the scene for evidence; identify bomb components; properly collect the evidence, and recognize and document the dynamics of the explosion, including what occurs when an explosive is initiated and the results of that initiation. An investigator trained in this discipline should have the knowledge to understand what they see at the site of an explosion and allow them to come to a logical conclusion regarding the incident. This can only be achieved through proper training and work experience.

An explosive investigator should have training in explosives and explosive effects, crime scene and post-blast investigations procedures, and evidence collection and documentation. A sufficiently experienced investigator should receive this training in the field of explosives through formal, organized study. This should include textbooks or materials, and classroom instruction, as well as practical field experience. This training can be obtained from various sources, including military experience, or law enforcement agencies. It is misleading to suggest that there is no formal training in the field of explosives for a bomb scene investigator.

The reasonable scope of expert testimony is determined by review of physical damage and evidence collection to determine cause of the explosion and its location. In any given case, an investigator should:

1. Conduct a thorough evaluation of the alleged explosive scene;
2. Conduct, participate in, or directly instruct collection of evidence. Evidence is generally found in three areas of a suspected explosion: the target, victims, and outside the immediate scene. The evidence collection should encompass all items and materials that are suspected to be related to the

explosive device and include items that demonstrate significant explosive damage, which provides information about the original location of the device. Any recovered item should be photographed prior to collection, in order to preserve the location where it was found, and its condition at the time of collection. The collection of evidence of a bombing is one aspect of scene documentation that involves the correct selection and use of containers to hold the evidence materials. Once collected by members of the search team, all evidence should be labeled, photographed, and stored in appropriate containers. The containers must be appropriately marked for identification and accountability purposes. These markings should include the evidence number, the location where the evidence was found, the finder's name or initials, and the date found. The containers should be selected based on the type of evidence recovered, and they should afford sufficient protection and preserve the materials in their found conditions to permit their collection, storage, transport to the laboratory for examination, and subsequent use in any legal proceedings. For example, any explosives, explosive residue, IED components, or swabs to be subject to laboratory analysis should be stored in an anti-static bag, which should then be placed in a protective metal container. Other items, such as clothing or other items damaged by the explosion (to show explosive effects), can be stored in a paper bag or box. A chain of custody should be maintained that documents where the items are stored, moved or who has handled it.

3. All collected evidence should be reviewed and its relationship to the event determined. The investigators should identify parts of the original device for signs of explosive damage or other indicia that it was part of, or in proximity to, the explosive event. Explosive damage consists of incendiary or thermal effects, fragmentation, and blast damage to structures that would indicate the initial location of the blast seat. Thermal damage is defined as melted, charred or physically burned material. Forensic chemical examination should be conducted to determine the type of

explosives used, and identification of parts recovered as evidence. This examination should be conducted by a qualified laboratory and chemist trained in explosives analysis.

Testimony of an Investigator

After the materials are reviewed, if sufficient evidence is available, the investigator can reasonably draw conclusions about the following:

i. The location of the seat of the blast;
ii. The type of explosives contained in the device;
iii. The components that made up the device;
iv. The direction of the shock wave created by the explosion; and
v. A reconstruction of the device if warranted.

Nature of an Explosive Device

The core components of an explosive device and their role in creating an explosive event consist of:

i. a power source, specifically a battery, if it is an electronic-initiated explosive device;
ii. an igniter or blasting cap depending on the type of explosives used, which consists of an electrically initiated or burning fuse;
iii. the explosives, meaning the chemical compound that causes an explosion, once initiated;
iv. a switch or means of initiation of the power source of the device, which could be triggered by a timer, command/remote control, or altitude switch, which closes allowing electrical current to flow from the power source to the initiator, initiating the explosives.

Nature of Explosives

Explosives fall into two different categories, based on their velocity of detonation: high explosives and low explosives. High explosives are designed to create a shattering, breaking, or tearing effect. Low explosives, such as propellants, are designed to create a pushing or shoving effect. Different explosives have different velocities of detonation (VOD). Velocity of detonation is defined as the rate at which the detonation or combustion wave travels through a confined quantity of explosives. The effects of the velocity of detonation (VOD) are based on the nature of the explosives. High explosives have a VOD of over 3,300 feet per second (FPS) to 29,000 FPS. TNT is an example of a high explosive and is the base line that other high explosives are based on. In an explosion involving a high explosive, an investigator would expect to see ripping and shattering of materials such as metal. Low explosives have a VOD lower than the speed of sound, in the range less than 1,500 FPS. The type of confinement of low explosives could affect or increase the VOD of low explosives. An example of a low explosive is smokeless or black powder. In an explosion involving a low explosive, an investigator would expect to see primarily thermal damage.

Nature of an Explosion

An explosive event is defined as a transformation of usable energy in a sudden and rapid production of gases accompanied by heat, shock wave and noise. A mechanical event is defined as a gradual buildup in pressure until that pressure overcomes the confines of the containment vessel, which causes a mechanical rupture of the container. Determining if an incident is an explosive event, versus a mechanical event, is done by physically examining the evidence collected to determine if an explosive device was used. In particular, this requires examination of the physical damage to look for blast and thermal damage to its environment In an explosive event, an examiner can expect to see such blast and thermal damage. In a mechanical event, this physical evidence will not be present, as it is caused by pressure that exceeds the structural integrity of the container, leading to a rupture.

An explosive event initially causes a positive pressure wave, which is defined as blast over pressure. Blast overpressure is the rapid generation of expanding gases, creating high pressure, or a shock wave, moving outward from the explosion. The larger the explosion, the higher the peak shock wave, resulting in more damage. This occurs because, when a high order explosion is initiated, a very rapid exothermic chemical reaction occurs. As the reaction progresses, the solid or liquid explosive material is converted to very hot, dense, high-pressure gas. The explosion products initially expand at very high velocities in an attempt to reach equilibrium with the surrounding air, causing a shock wave. A shock wave consists of highly compressed air, traveling radially outward from the source at supersonic velocities.

This initial shock wave also creates a negative pressure wave, resulting in a second wave traveling back toward the seat of the explosion. Each of these shock waves have damaging effects on the items near the seat of the blast, the surroundings, and the displacement of the evidence. The results of this blast wave, consisting of both the positive and negative pressure displacement, are observed by the investigator by the surrounding damage and location of critical parts to identify the bomb. For example, while most items near the seat of the blast would be forced away from their original location by the blast overpressure, lighter components of the device and surrounding material could be pulled back into the blast seat by the negative pressure wave. The blast wave can be affected by the surrounding environment where the explosion occurs. If the blast wave encounters a solid surface, the resulting pressure wave will be reflected, amplifying the shock wave and causing it to be more destructive, due to the shock wave reflection. Altitudes such as those found in an aircraft at 30,000 feet could affect the generation of the positive and negative pressure waves and therefore, will be more intense than one in an open container or outdoor area.

The seat of the blast is the physical location where the explosion originated. Examination of the surrounding structures for evidence of physical and thermal damage is critical for determining the seat of the blast, as an explosion typically

creates a crater or other obvious physical damage caused by an explosion. Depending on the explosive used these temperatures could reach 7,000 degrees Fahrenheit. Generally speaking, the items or evidence with a greater degree of thermal damage are assumed to have been closer to seat of the blast; those with less thermal damage are assumed to have been further away. This observation allows the investigator to conclude where the explosion originated from. The degree of specificity that can be determined regarding location of seat of blast, depends on the physical and thermal damage of the surrounding environment and, typically, the formation of a "crater." A crater occurs at the epicenter or "seat" of the explosion, and the investigator can reasonably conclude that the seat of the blast is where the crater is observed. For an explosion that takes place outdoors on or near the ground, the crater would be observed as an indentation in the ground. In an explosion that takes place indoors on or near a floor or in a vehicle, it would be observed as a hole in the floorboard of the house or car. Because the examination of the physical evidence is critical to determining how the explosive device was assembled, recovering more items or partial items allows the investigator to be more precise in concluding the seat of the blast. The degree of damage to the items also impacts the ability to determine the origins. If items are severely damaged, they can reasonably be assumed to have been near the seat of the blast, however, if they cannot be reassembled to their original form, this impacts the ability to pinpoint their exact relationship to the explosives. In examining the explosion of a large aircraft, where the physical evidence was either not recovered or significantly damaged recovered over the course of many miles, it is unreasonable for an investigator to claim that he/she can identify the seat of the blast within centimeters.

The ability to determine the original location of the explosive device is based on the physical characteristics of blast-involved evidence. One measure of a specific location is outward damage to metal structures. Outward damage describes the damage that occurs from the outward expansion of pressure, blast waves, and fragmentation from the seat of the blast. If the damage to a piece of evidence shows

the material has been pushed outward and exhibits thermal damage, the investigator can reasonably conclude that this evidence was near the seat of the blast.

Chemical Testing

RDX and PETN are chemical explosives that a trained explosives investigator should be familiar with. If both RDX and PETN are found in the same explosion, it is probable that the explosive chemical used was Semtex. It is possible, however, for the two substances to be used separately in an explosion. It is also possible for RDX and PETN to be used individually in a single explosive event. For example, RDX could be used as a base charge and PETN can be used in the detonator or booster charges.

Investigator Testimony

An investigator in an explosives event should maintain an unbiased approach when examining the evidence. Conclusions about the explosive event should be drawn from a strict methodology in examining the physical evidence and an explosives expert should limit his/her post-blast investigation to the physical evidence that is available and the analysis of that physical evidence. Accordingly, an expert in this field should limit his/her testimony to what the physical evidence demonstrates. An explosives expert should not seek outside evidence or engage in independent investigation.

Testing

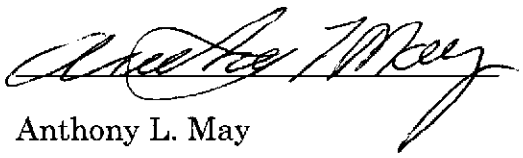
When conducting comparison explosive tests, examiners should attempt to replicate the environment in which the incident occurred as specifically as possible. Similarly, examiners should seek to prevent conditions that vary from the suspected explosive incident. Variation in conditions are likely to taint or produce different conclusions. If the testing conducted does not sufficiently replicate the circumstances of the suspected explosive event, the results should not be relied upon as evidence or illustration of what occurred during the suspected explosive event.

Atmospheric conditions affect the velocity of detonation (VOD) of an explosion. There would, therefore, be a difference in the velocity of detonation occurring at a height of 30,000 feet versus at sea level (or slightly above). Atmospheric pressure provides the medium - air - that an explosion compresses to create a shock wave. Higher initial atmospheric pressure can result in a blast wave with a lower peak overpressure or generation of the initial shock wave and duration of time. This may also affect the negative pressure wave (i.e. the wave of pressure that occurs after the initial shock wave which displaces the air at the blast seat, drawing items back into the vacuum created). Lower ambient pressure which is the pressure of the surrounding medium, such as a gas or liquid in contact with the object, can lead to a higher velocity for the blast wave. The force of a shock wave increases as ambient pressure decreases, possibly causing more damage. The air pressure difference between sea level and 31,000 feet is approximately 10.5 psi, as the air pressure at sea level is approximately 14.7 psi and is 4.18 to 4.26 psi at an elevation of 31,000 feet. Any testing that occurs at or near sea level would not adequately replicate an explosion that takes place at 31,000 feet.

Other variables in testing must also appropriately replicate the circumstances of the explosion under investigation. Failure to account for all relevant factors, such as the confinement of an explosion, will impact the results. An investigator should expect to get different results when testing in an open aircraft fuselage (or a different aircraft fuselage) than those that occurred in the closed pressurized fuselage of an aircraft in flight. Likewise, the amount and the type of explosive will impact the results of the testing. Accordingly, the testing that took place at Indian Head, Maryland and Atlantic City, New Jersey would not reliably replicate the alleged conditions of the Pan Am 103 incident.

Mr. May will be offered as an expert witness in device design, functions, effects, post-blast procedures, and evidence collection. He will testify to his training and background, and his review of the exhibits and reports presented in discovery.

In accordance with Federal Rule of Criminal Procedure 16(b)(1)(c)(v), I approve this disclosure:



Anthony L. May

Please feel free to call me should you have any questions.

Sincerely,

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Whitney E.C. Minter
Laura J. Koenig
Brooke S. Rupert
Assistant Federal Public Defenders

Counsel for Mr. Al-Marimi