UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	**Case No. 22-cr-392 (DLF)**
	:	
ABU AGILA MOHAMMAD MAS'UD KHEIR AL-MARIMI,	:	
	:	
Defendant.	:	

GOVERNMENT RESPONSE TO DEFENSE'S UPDATED NOTICE OF JERRY TAYLOR

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully responds to the defense's updated notice of the proposed expert testimony of Jerry Taylor at trial.

ARGUMENT

The Testimony is Not Relevant

At the August 4, 2026 hearing, the Court ordered the defense to clarify in writing Mr. Taylor's qualifications to provide his conclusions and the relevant of his testimony. Aug. 4. 2026 Tr. at 41. On August 11, 2026, the defense filed an updated notice. See Attachment A. However, the notice appears to have changed very little in substance from the original notice. See Attachments B and C. The June 10, 2026 notice was 15 pages long, and the August 11, 2026 notice was 14 pages long. The government notes that defense added two sentences about Mr. Taylor's work experience on the investigation of the crash of TWA Flight 800 (which was not the result of a bomb). However, based on representations from defense counsel, his experience consisted of approximately five days of meetings and briefings, with no hands-on or field experience. This limited experience does not change the government's position that Mr. Taylor's testimony is not relevant to this case, as he does not have the qualifications to opine on the conclusions he drew in this case.

Additionally, narrowing the expert notice by one page does not clarify anything as it relates to Mr. Taylor's potential testimony. Accordingly, the government reiterates its original arguments in ECF 500 and ECF 521 and maintains its position that Mr. Taylor's testimony as stated is irrelevant.

CONCLUSION

For the foregoing reasons, the Court should GRANT the government's motion to limit the testimony of Mr. Taylor.

Respectfully submitted,

JEANINE FERRIS PIRRO
UNITED STATES ATTORNEY

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August 11, 2026

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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. Jerry Taylor as an expert witness at trial. His attached *curriculum vitae* sets forth his extensive credentials. Mr. Taylor recalls that he wrote an article for "Security" magazine over 35 years ago regarding letter and package bomb recognition and the response to the same. He has not testified in the past four years.

We intend to call Mr. Taylor 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.

Qualifications

Mr. Taylor received his initial training in explosives while attending the Naval Aviation Ordnanceman Course in the Naval Air Technical Training Unit. He received instruction on military, specifically Navy, bombs, missiles, rockets, air-dropped mines and how to store them, how to store explosives, how to operate explosives and munitions storage magazines, how to load those munitions on aircraft after assembling the fuse, and how to unload them and defuse them. After working in that field for a year, Mr. Taylor then became an apprentice for an explosive ordnance disposal team, where he learned the rudimentary aspects of diving, commercial and military explosives and their use, demolition.

Mr. Taylor then attended the Explosive Ordnance Disposal School, operated by the U.S. Navy, which is an intensive course attended by members of all branches of services for training to become explosive ordnance disposal technicians. Instruction about ordnance is provided by approximately a dozen countries about how to identify and render safe rockets, mines, missiles, and mortars and special weapons.

Mr. Taylor also served in the Navy during four deployment tours during the Vietnam War utilizing the training he had received to that point. In combat, Mr. Taylor and fellow military members were responsible for destroying caches of explosives and weapons. Mr. Taylor also cleared booby traps for multiple branches, including the Vietnamese military and the United States Army. Mr. Taylor was also service certified as a Master Explosives Ordnance Disposal technician during this time.

When Mr. Taylor left active duty service in the Navy in 1979, he became a member of the Active Naval Reserve in a Special Warfare Unit. That same year he joined the Bureau of Alcohol, Tobacco and Firearms (ATF), where he worked for 20 years as an explosives enforcement officer. His duties in that role included analyzing and classifying thousands of suspected IEDs, homemade bombs, and destructive devices, processing post-blast scenes, as well as conducting hundreds of rendering safe and exploiting procedures. He also provided consultation for local police

departments, and served as an affiant for ten to twelve search warrants, , for which his representations in the affidavits pertained to explosives and destructive devices and their components

While employed by the ATF as an explosives enforcement officer, Mr. Taylor also created and supervised training programs in explosives and incendiaries, including the first post-blast post-certified course and developed a model for a recertification course.

Mr. Taylor served as ATF's lead explosive enforcement officer during the Oklahoma City bombing investigation, where his role included identifying potential explosives and destructive devices, both for safety and for evidentiary purposes, and rendering them safe, when necessary. His efforts also identified where the drums filled with explosives were manufactured and sold, other post-blast critical information, including a report of the device and positioning in the truck. Mr. Taylor was the primary EOD and explosives enforcement officer for the Waco incident. Mr. Taylor retained the suspect's IEDs as evidence and ensured that the compound was void of hazardous items. He was also responsible for providing a route free of explosive devices for the Hostage Rescue Team during the Ruby Ridge investigation, and was the senior explosive enforcement officer for other significant investigations.

During his 20-plus year ATF law enforcement career, Mr. Taylor received over 140 letters of recognition, including the ATF Medal of Valor, the Distinguished Service Award from the International Association of Bomb Technicians and Investigators and the United States Treasury Gallatin Award for exemplary service.

Throughout his career with the BATF, Mr. Taylor routinely worked with other agencies, including the Federal Bureau of Investigation, including teaching at the International Police Academy in Budapest, Hungary. Mr. Taylor also served as a consultant to the FBI during the investigation of the TWA 800 accident. During the days following the crash, he participated in closed daily briefings, to review the information and updates presented by witnesses and law enforcement, and provide

consultation to then-Assistant Director in Charge of the New York field office about the possibility that an explosive device was involved in the incident.

After retiring from the ATF in 2000, Mr. Taylor continued working in the field of explosives and incendiaries and taught explosives and terrorism methods, including the FBI's International Police Academy Course in Quantico, Virginia, as well as developing a proactive course on Explosive Incident recognition for chemicals and components for the Institute of Intergovernmental Research (IIR). Mr. Taylor worked with a team that included members of the FBI to educate thousands of law enforcement officers in the United States.

Mr. Taylor was employed briefly by the State Department in the Middle East where he provided specific training to the Jordanian federal police and for classified anti-terrorism activity for the United States Army Office of Commissions, regarding explosive devices and their components.

Mr. Taylor has previously testified in federal court as an expert in the field of explosives and incendiary devices IEDs, and their uses, effects, and functioning, including in the District Court for the District of Colorado in 2018 and the Western District of Texas in 2021.

General Explosives Background

High Explosive. A material that is capable of sustaining a reaction front that moves through the unreacted material at a speed equal to or greater than that of sound in that medium [typically 1000 m/sec (3280 ft/sec); a material capable of sustaining a detonation. This definition comes verbatim from the National Fire Protection Association (NFPA), as a recognized authority.

Low Explosives and Deflagration. A deflagration is an explosion where the flame speed is lower than the speed of sound, which is approximately equal to 335 m/sec (750 mph). Explosives that deflagrate are known as low explosive (not low order explosive). The actual speed of the explosion can vary from 1–350 m/s (2–780 mph). Peak pressures produced by low explosives are orders of magnitude lower than those

produced by high explosives, and the damage inflicted by low explosives can vary greatly depending on the fuel and confinement. For example, if black powder is ignited outside of containment, it just fizzles, but when it is confined, it creates an explosion that can propel bullets. In addition to the black powder example, examples of deflagrations involving low explosives include the ignition of propane gas for a cooking grill and fuel powering of a combustion engine in a car. This definition comes verbatim from the NFPA.

Blasting Agent. Any material or mixture, consisting of fuel and oxidizer, that is intended for blasting and not otherwise defined as an explosive; if the finished product, as mixed for use or shipment, cannot be detonated by means of a number 8 test blasting cap when unconfined. A number 8 test blasting cap is one containing 2 grams of a mixture of 80 percent mercury fulminate and 20 percent potassium chlorate, or a blasting cap of equivalent strength. An equivalent strength cap comprises 0.40-0.45 grams of PETN base charge pressed in an aluminum shell with bottom thickness not to exceed 0.03 of an inch, to a specific gravity of not less than 1.4 g/cc. and primed with standard weights of primer depending on the manufacturer. This definition comes from 27 CFR § 555.

Definition of an Explosion. An explosion is a sudden, rapid release of energy that produces potentially damaging pressures. When a gaseous fuel fills a space, it needs to mix to a certain air-fuel concentration to create an explosive atmosphere. When an ignition source is introduced into the explosive atmosphere, it creates a flame that travels away from the ignition site and expands the burned gases behind the flame front. When an explosion is confined, it creates a restraint of the expanding gases and results in an increased pressure within the enclosure. However, explosions don't always need to be confined. The flame speed in explosions can be quick enough to produce compression waves and cause damage with little or no confinement. The damage potential of an explosion depends on the pressure that is created from the explosion as well as how quickly energy is released from the explosion. Explosions

can be either detonations or deflagrations depending on their flame speed. This definition comes verbatim from the NFPA.

Definition of a Detonation. A detonation is an explosion where the flame speed is greater than the speed of sound. Detonations are louder and often more destructive than deflagrations. While deflagration occurs when a fuel and oxidizer mix, a detonation doesn't always need an external oxidizer. Explosives that detonate are referred to as high explosives and have a detonation speed in the range of 2,000–8,200 m/sec (4,500–18,000 mph). High explosives are typically designed to cause destruction—often for demolition, mining, or warfare. Examples of high explosives that detonate include dynamite, TNT, and C4, a plastic-based explosive.

The term explosion can include the definition deflagration and detonation, but these are two separate phenomena. Confining some low explosives such as double base smokeless powder in a hardened container can produce high explosive damage effects. This definition comes verbatim from the NFPA.

What constitutes an explosive or incendiary weapon commonly referred to as an Improvised explosive Device (IED) or homemade bomb.

In general, there are three required components, at a minimum: an igniter or initiator, a detonator, and a main charge. Some of these terms are interchangeable depending upon the bomb's explosive train. Examples of igniters/initiators include a pull friction igniter, a match, or a battery. It is the item that permits or causes the action of exploding a bomb to begin. Examples of other types of initiators include an electric model rocket igniter, an electric squib and a mechanically actuated primer**.**

Examples of detonators include electric and non-electric blasting caps, the high explosive item that directly causes the explosion when functioned

Main charges are the bulk explosive of any type. Low explosives require a hard container to produce blast, thermal and fragmentation effects.

Explosives trains defined and examples of them: In order for a bomb to function it must have an appropriate explosive train, defined as the correct type of components arranged in the correct connected order to result in an explosion. Suicide bombs generally have the least components and few, if any, safety mechanisms for safe separation between the target and the bomber (the person carrying out the act of perpetrating a bombing.

Typical electric bomb train: A battery connected to a timer (mechanical or electric) that, after a pre-set delay, permits electricity to enter a connected electric blasting cap (detonator) that has been placed into the main charge (explosives). The safe separation component between the initiator and the detonator could also be a barometric switch or photo-electric cell. Any component that is correctly connected to serve as safe separation between the bomber and the target qualifies as a safe separation component

Another example of an electric bomb train would be a battery connected to a delay component that is connected to an electric match, squib or hobby igniter that has been placed in confined low explosives, as in a pipe bomb. The type and variety of safe separation components are only limited by the bomb builder's knowledge of proper explosive trains. What is important is that the component between the power source/initiator and the main charge/explosive permits the perpetrator to be somewhere else, in a safe location.

Typical non-electric bomb trains. Removing the safety pin on a grenade permits a mechanical component to strike a primer that spits a flame into a delay (the length of time fuse that burns when ignited). At the end of the burning delay, the time fuse spits flame into a non-electric blasting cap that has been positioned in the main charge.

Another example would be using a match or connected pull-friction igniter (initiator examples) to provide a spit of flame to ignite a length of hobby or

commercial fuse that was cut to a specific length to provide a specific time delay that, at the end of the delay, provides a spit of flame to a non-electric blasting cap (detonator) that has been placed in the main charge (explosive).

Training for bomb scene investigator

The United States has no single source of training or standard. It is critical to have documented formal training coupled with actual hands-on training in explosive identification and use, post-blast bomb scene processing and associated evidence evaluation and collection processes.

Basic explosives training should include the types of explosives as identified in the applicable law and statutes. Different countries have similar classifications, but not precisely the same.

Basic explosive recognition training should also be incorporated, including knowledge of various explosives used in the world and by militaries, minimum components required to make up what is called an Explosive Train (components required to initiate an explosion process to the point of explosion).

Without exception, military courses are the most in depth, longest and provide the most classroom and hands-on training/experiences. Major federal law enforcement agencies and training centers also provide basic explosive recognition and use training to include the FBI, BATFE and the Federal Law Enforcement Training Center (FLETC). Many countries worldwide have similar training and that can be identified and explored through the International Association of Bomb Technicians and Investigators (IABTI). Being a member is also important as they offer continued education on explosives, post blast and bomb scene training, evidence collection and evidence evaluation (identification of blast damaged items, what items should be documented, preserved and or collected) and so much more related to Improvised Explosive or Incendiary Devices (IEDs, IIDs) including render safe procedures and review of major post blast investigation by various worldwide bomb investigators and bomb technicians.

In the United States, a qualified explosives investigator should have access to and knowledge of references that include:

- The now out of date (widely copied and circulated) International Association of Chiefs of Police (IACP), professional standards manuals series detailing explosives, IEDs, IIDs, detonators and chemical agents, or the numerous similar publications available.

-Various FBI/ BATFE introduction/identification of explosives/explosions training courses and documents.

-Military Technical manuals (TMs) that provide detailed information on Explosives and the explosive process and components.

-Fire protection Guide to Hazardous Materials that provides detailed information on chemicals that react violently or that can be used in IEDs, IIDs.

A trained explosives examiner should also have actual hands-on experience identifying and processing post blast scenes beginning with a scene involving an individual or a vehicle with just one or two experienced investigators. They should progress on to larger, more complex scenes.

Another near-mandatory experience is learning how to set up and correctly operate sifting operations as this involves taking an amount of gathered material (dirt, rocks, general debris, etc.) from a specific pre-marked post blast scene area and then identifying and documenting possible evidence for later analysis.

An investigator should also have basic knowledge of post blast scene parameters and requirements (size, hazards, obstacles, scene processing layout, security required, etc., and Scene Control (identification of people involved and others that enter and why) should be documented.

A trained explosives investigator should also have knowledge concerning Control Samples. These are collections logged into evidence via swabbings and small materials that are thought to be in an unaffected/clean area to rule out contamination already present. This eliminates, or identifies, areas that are inside the post blast

process area that have no chemical link to the evidence, or that may have been previously contaminated legally or illegally which may provide false indicators as to the chemicals or explosives utilized.

Finally, evidence-recovery techniques to best preserve items/materials for laboratory analysis are a must for all stages of experience.

In summation, after receiving basic training in several disciplines, coupled with documented hands-on experience (as in multiple post blast scene work and evidence gathering/analysis), these individuals add credibility to the science of post blast scene processing and evidence collection/interpretation including assembling mock up devices that represent what device was employed and testing of live explosive mock up devices to duplicate or represent functioning and effects of the used device.

Process for bomb scene investigator

A qualified explosives examiner should:

1. Attempt to acquire information concerning the suspected target, size of the post blast area, current security, need for a bomb squad to make certain that there are no secondary IEDs in the immediate area, assemble required security tape, tools, and evidence containers plus documentation materials;

2. Identify the most outer perimeter and the area needing post blast processing (which can always be altered depending upon developing information);

3. Decide the type of search pattern to use: line, circular, quadrants, etc. that permits documenting evidence recovery locations;

4. Depending upon circumstances, and to prevent the loss of evidence, decide where to begin searching: close- in to what seems like the point of the explosion or at the farthest distance.

5. Decide as early as possible the need for sifting operations to have equipment and trained personnel available;

6. Video or picture document the post-blast scene before any work is started;

7. Decide the need, and the where and when to acquire control samples on a continuous basis;

8. Properly, bag, tag and document evidence recovery, separate any evidence that could cause cross contamination (blood, explosive residence, chemicals);

9. Evaluate as much evidence as possible on scene for communication with the field investigating team;

10. Make informed decisions using input from witnesses and other trained personnel (laboratory, scientific and highly experienced post blast scene processors) on what is of evidentiary importance;

11. Properly secure and transport evidence maintaining/documenting a chain of custody.

Opinions and Conclusions

During the course of my evaluation of the materials and exhibits associated with this incident, I reviewed the following government discovery provided by defense counsel. I took the following information at face value for purposes of my analysis, but I cannot independently verify such evidence as fact.

- Exhibit 301-RARDE report, particularly the information on pages 8 and 9, which I then attempted to visually compare this information to Exhibits 302. 039, 302.040, 302.041, and to the computer-generated diagram in exhibit 302.031;
- Photographs from the RARDE report;

- Photographs of suitcase-loaded luggage containers prior to their explosion and associated results;
- Photographs of and notes of explosive testing;
- Other information provided from discovery documents.

No information was provided stating whether there were additional tests at different locations under different criteria other than what has been mentioned in the materials received for review and evaluation.

Variables that I considered in providing my opinion included:

- What was the actual condition of the luggage container involved in this incident such as handler abuse, dents or normal wear and tears. I presumed the condition to be used with expected dents and dings.
- How accurately the explosively damaged container pieces could be reassembled to provide precise measurements.
- That the pitting or dimpling marks in the diagram would be somewhat difficult to pinpoint within one or two centimeters during the reassembly process. Further, attesting to the accuracy of precise location to the pitting/cratering in relationship to the point of explosion is difficult for me to accept to the exclusion of all other scenarios without detailed proof. The point of explosion and the resulting damage can be documented to approximates, but consideration of variables should be noted.
- The position of the IED suitcase in the luggage container. Two possible positions are offered, but those are done without knowing the precise position of the Toshiba radio in the IED suitcase and the precise position of the explosive main charge within the radio. These are variables that I considered, and they can present probable changes to a final conclusion. In my opinion, the two positions offered are definitely to be considered but are not verified fact.

My conclusion was that the IED suitcase could have been touching the bottom of the luggage container or in proximity to the bottom and also touching or in proximity to the upward slanted side. I base this on the fact that the location of the Toshiba radio within the suitcase is unverified, the location of the explosive main charge within the Toshiba radio is unverified and the amount of the explosives used is unverified. However, the amount of explosives used and the damage documented does imply the use of a plastic high explosive and approximately a pound in weight that might equate to one brick of Semtex, the explosive that appears to be scientifically verified.

Additionally, the position of the clothes, their type and condition in relationship to the radio and the encased explosives could alter the precise position of the radio and the explosive charge. I did see what appears to be part of a radio speaker, but no indication that a second speaker was present.

Based upon my review and evaluation, and consideration given to these variables of which there probably more, I cannot state with professional certainty the precise location of the IED suitcase, the location of the radio within the suitcase, the location of the explosives main charge within the radio, nor the amount of explosives used. I don't disagree with the approximates provided, but not to the exclusion of other possibilities.

Having approximately fifty plus years of experience (1968 to 2021) involving explosive training, demolition work, post blast training and testing involving IEDs with known and unknown variables, I am aware that results can vary significantly depending upon the test criteria and parameters.

In conclusion, my opinion is that approximately one pound (453 grains), or one brick of high explosives, identified as Semtex by laboratory analysis, was positioned inside a radio that was positioned inside of a suitcase along with other clothing and items, and that this suitcase was touching or very close to the bottom of the luggage container and touching or close to the upward slanted side.

Additionally, I am unable to reflect on the variables of what the vibrating aircraft in flight does to the entire scenario and what the pressure inside of that part of the aircraft means to the resulting effects and positions. It is also my opinion that adding in other materials and chemicals, or removing/deleting materials during testing will most likely provide somewhat different results.

Mr. Taylor will be offered as an expert witness in the in the field of explosives, both foreign and domestic, improvised explosive devices (IEDs), improvised incendiary devices (IIDs) and their components, assembly, functioning and effects. 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:

Jerry Taylor

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

Sincerely,

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

Counsel for Mr. Al-Marimi

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June 10, 2026

Via E-mail

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Washington, DC 20530

Re: *United States v. Abu Agila Mohammad Mas'ud Kheir Al-Marimi*
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homemade bombs, and destructive devices, processing post-blast scenes, as well as conducting hundreds of rendering safe and exploiting procedures. He also provided consultation for local police departments, served as an affiant for ten to twelve search warrants, and participated in serving over 100 search warrants.

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of deflagrations involving low explosives include the ignition of propane gas for a cooking grill and fuel powering of a combustion engine in a car. This definition comes verbatim from the NFPA.

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Definition of an Explosion. An explosion is a sudden, rapid release of energy that produces potentially damaging pressures. When a gaseous fuel fills a space, it needs to mix to a certain air-fuel concentration to create an explosive atmosphere. When an ignition source is introduced into the explosive atmosphere, it creates a flame that travels away from the ignition site and expands the burned gases behind the flame front. When an explosion is confined, it creates a restraint of the expanding gases and results in an increased pressure within the enclosure. However, explosions don't always need to be confined. The flame speed in explosions can be quick enough to produce compression waves and cause damage with little or no confinement. The damage potential of an explosion depends on the pressure that is created from the explosion as well as how quickly energy is released from the explosion. Explosions can be either detonations or deflagrations depending on their flame speed. This definition comes verbatim from the NFPA.

Definition of a Detonation. A detonation is an explosion where the flame speed is greater than the speed of sound. Detonations are louder and often more destructive than deflagrations. While deflagration occurs when a fuel and oxidizer

(typically air) mix, a detonation doesn't always need an external oxidizer. Explosives that detonate are referred to as high explosives and have a detonation speed in the range of 2,000–8,200 m/sec (4,500–18,000 mph). High explosives are typically designed to cause destruction—often for demolition, mining, or warfare. Examples of high explosives that detonate include dynamite, TNT, and C4, a plastic-based explosive.

The term explosion can include the definition deflagration and detonation, but these are two separate phenomena. Confining some low explosives such as double base smokeless powder in a hardened container can produce high explosive damage effects. This definition comes verbatim from the NFPA.

What constitutes an explosive or incendiary weapon commonly referred to as an Improvised explosive Device (IED) or homemade bomb.

In general, there are three required components, at a minimum:. an igniter or initiator, a detonator, and a main charge. Some of these terms are interchangeable depending upon the bomb's explosive train. Examples of igniters/initiators include a pull friction igniter, a match, or a battery. It is the item that permits or causes the action of exploding a bomb to begin. Examples of other types of initiators include an electric model rocket igniter, an electric squib and a mechanically actuated primer**.**

Examples of detonators include electric and non-electric blasting caps, the high explosive item that directly causes the explosion when functioned

Main charges are the bulk explosive of any type. Low explosives require a hard container to produce blast, thermal and fragmentation effects.

Explosives trains defined and examples of them: In order for a bomb to function it must have an appropriate explosive train, defined as the correct type of components arranged in the correct connected order to result in an explosion.

Suicide bombs generally have the least components and few, if any, safety mechanisms for safe separation between the target and the bomber (the person carrying out the act of perpetrating a bombing.

Typical electric bomb train: A battery connected to a timer (mechanical or electric) that, after a pre-set delay, permits electricity to enter a connected electric blasting cap (detonator) that has been placed into the main charge (explosives). The safe separation component between the initiator and the detonator could also be a barometric switch or photo-electric cell. Any component that is correctly connected to serve as safe separation between the bomber and the target qualifies as a safe separation component

Another example of an electric bomb train would be a battery connected to a delay component that is connected to an electric match, squib or hobby igniter that has been placed in confined low explosives, as in a pipe bomb. The type and variety of safe separation components are only limited by the bomb builder's knowledge of proper explosive trains. What is important is that the component between the power source/initiator and the main charge/explosive permits the perpetrator to be somewhere else, in a safe location.

Typical non-electric bomb trains. Removing the safety pin on a grenade permits a mechanical component to strike a primer that spits a flame into a delay (the length of time fuse that burns when ignited). At the end of the burning delay, the time fuse spits flame into a non-electric blasting cap that has been positioned in the main charge.

Another example would be using a match or connected pull-friction igniter (initiator examples) to provide a spit of flame to ignite a length of hobby or commercial fuse that was cut to a specific length to provide a specific time delay that, at the end of the delay, provides a spit of flame to a non-electric blasting cap (detonator) that has been placed in the main charge (explosive).

Training for bomb scene investigator

The United States has no single source of training or standard. There is a significant difference between those that infer they have sufficient explosive investigation training and those that have documented formal training coupled with actual hands-on training in explosive identification and use, post-blast bomb scene processing and associated evidence evaluation and collection processes.

Basic explosives training should include the types of explosives as identified the applicable law and statutes. Different countries have similar classifications, but not precisely the same.

Basic explosive recognition training should also be incorporated, including knowledge of various explosives used in the world and by militaries, minimum components required to make up what is called an Explosive Train (components required to initiate an explosion process to the point of explosion).

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In the United States, a qualified explosives investigator should have access to and knowledge of references that include:

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-Various FBI/ BATFE introduction/identification of explosives/explosions training courses and documents.

-Military Technical manuals (TMs) that provide detailed information on Explosives and the explosive process and components.

-Fire protection Guide to Hazardous Materials that provides detailed information on chemicals that react violently or that can be used in IEDs, IIDs.

A trained explosives examiner should also have actual hands-on experience identifying and processing post blast scenes beginning with a scene involving an INDIVIDUAL or a VEHICLE with just one or two experienced investigators. They should progess on to larger, more complex scenes.

Another near-mandatory experience is learning how to set up and correctly operate sifting operations as this involves taking an amount of gathered material (dirt, rocks, general debris, etc.) from a specific pre-marked post blast scene area and then identifying and documenting possible evidence for later analysis.

An investigator should also have basic knowledge of post blast scene parameters and requirements (size, hazards, obstacles, scene processing layout, security required, etc., and Scene Control (ID of people involved and others that enter and why) should be documented.

A trained explosives investigator should also have knowledge concerning Control Samples. These are collections logged into evidence via swabbings and small materials that are thought to be in an unaffected/clean area to rule out contamination already present. This eliminates, or identifies, areas that are inside the post blast process area that have no chemical link to the evidence, or that may have been

previously contaminated legally or illegally which may provide false indicators as to the chemicals or explosives utilized.

Finally, evidence-recovery techniques to best preserve items/materials for laboratory analysis are a must for all stages of experience.

In summation, after receiving basic training in several disciplines, coupled with documented hands-on experience (as in multiple post blast scene work and evidence gathering/analysis), these individuals add credibility to the science of post blast scene processing and evidence collection/interpretation including assembling mock up devices that represent what device was employed and testing of live explosive mock up devices to duplicate or represent functioning and effects of the used device.

Process for bomb scene investigator

A qualified explosives examiner should:

1. Attempt to acquire information concerning the suspected target, size of the post blast area, current security, need for a bomb squad to make certain that there are no secondary IEDs in the immediate area, assemble required security tape, tools, and evidence containers plus documentation materials;

2. Identify the most outer perimeter and the area needing post blast processing (which can always be altered depending upon developing information);

3. Decide the type of search pattern to use: line, circular, quadrants, etc. that permits documenting evidence recovery locations;

4. Depending upon circumstances, and to prevent the loss of evidence, decide where to begin searching: close- in to what seems like the point of the explosion or at the farthest distance.

5. Decide as early as possible the need for sifting operations to have equipment and trained personnel available;

6. Video or picture document the post-blast scene before any work is started;

7. Decide the need, and the where and when to acquire control samples on a continuous basis;

8. Properly, bag, tag and document evidence recovery, separate any evidence that could cause cross contamination (blood, explosive residence, chemicals);

9. Evaluate as much evidence as possible on scene for communication with the field investigating team;

10. Make informed decisions using input from witnesses and other trained personnel (laboratory, scientific and highly experienced post blast scene processors) on what is of evidentiary importance;

11. Properly secure and transport evidence maintaining/documenting a chain of custody.

Opinions and Conclusions

During the course of my evaluation of the materials and exhibits associated with this incident, I reviewed the following government discovery provided by defense counsel. I took the following information at face value for purposes of my analysis, but I cannot independently verify such evidence as fact.

- Exhibit 301-RARDE report, particularly the information on pages 8 and 9, which I then attempted to visually compare this information to Exhibits 302. 039, 302.040, 302.041, and to the computer-generated diagram in exhibit 302.031;
- Photographs from the RARDE report;

- Photographs of suitcase-loaded luggage containers prior to their explosion and associated results;
- Photographs of and notes of explosive testing;
- Other information provided from discovery documents.

No information was provided stating whether there were additional tests at different locations under different criteria other than what has been mentioned in the materials received for review and evaluation.

Variables that I considered in providing my opinion included:

- What was the actual condition of the luggage container involved in this incident such as handler abuse, dents or normal wear and tears. I presumed the condition to be used with expected dents and dings.
- How accurately the explosively damaged container pieces could be reassembled to provide precise measurements.
- That the pitting or dimpling marks in the diagram would be somewhat difficult to pinpoint within a couple of centimeters during the reassembly process. Further, attesting to the accuracy of precise location to the pitting/cratering in relationship to the point of explosion is difficult for me to accept to the exclusion of all other scenarios without detailed proof. The point of explosion and the resulting damage can be documented to approximates, but consideration of variables should be noted.
- The position of the IED suitcase in the luggage container. Two possible positions are offered, but those are done without knowing the precise position of the Toshiba radio in the IED suitcase and the precise position of the explosive main charge within the radio. These are variables that I considered, and they can present probable changes to a final conclusion. In my opinion, the two positions offered are definitely to be considered but are not verified fact.

My conclusion was that the IED suitcase could have been touching the bottom of the luggage container or in proximity to the bottom and also touching or in proximity to the upward slanted side. I base this on the fact that the location of the Toshiba radio within the suitcase is unverified, the location of the explosive main charge within the Toshiba radio is unverified and the amount of the explosives used is unverified. However, the amount of explosives used and the damage documented does imply the use of a plastic high explosive and approximately a pound in weight that might equate to one brick of Semtex, the explosive that appears to be scientifically verified.

Additionally, the position of the clothes, their type and condition in relationship to the radio and the encased explosives could alter the precise position of the radio and the explosive charge. I did see what appears to be part of a radio speaker, but no indication that a second speaker was present.

Based upon my review and evaluation, and consideration given to these variables of which there probably more, I cannot state with professional certainty the precise location of the IED suitcase, the location of the radio within the suitcase, the location of the explosives main charge within the radio, nor the amount of explosives used. I don't disagree with the approximates provided, but not to the exclusion of other possibilities.

Having approximately fifty plus years of experience (1968 to 2021) involving explosive training, demolition work, post blast training and testing involving IEDs with known and unknown variables, I am aware that results can vary significantly depending upon the test criteria and parameters.

In conclusion, my opinion is that approximately one pound (453 grains), or one brick of high explosives, identified as Semtex by laboratory analysis, was positioned inside a radio that was positioned inside of a suitcase along with other clothing and items, and that this suitcase was touching or very close to the bottom of the luggage container and touching or close to the upward slanted side.

Additionally, I am unable to reflect on the variables of what the vibrating aircraft in flight does to the entire scenario and what the pressure inside of that part of the aircraft means to the resulting effects and positions. It is also my opinion that adding in other materials and chemicals, or removing/deleting materials during testing will most likely provide somewhat different results.

Mr. Taylor will be offered as an expert witness in the in the field of explosives, both foreign and domestic, improvised explosive devices (IEDs), improvised incendiary devices (IIDs) and their components, assembly, functioning and effects. 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:

_____

Jerry Taylor

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

Sincerely,

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

Counsel for Mr. Al-Marimi

Page: 1

Text Replaced
[Old]: "June 10,"
[New]: "August 11,"

FEDERAL PUBLIC DEFENDER
EASTERN DISTRICT OF VIRGINIA
1650 KING STREET, SUITE 500
ALEXANDRIA, VIRGINIA 22314
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Whitney E.C. Minter
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whitney_minter@fd.org
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August 11, 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. Jerry Taylor as an expert witness at trial. His attached *curriculum vitae* sets forth his extensive credentials. Mr. Taylor recalls that he wrote an article for "Security" magazine over 35 years ago regarding letter and package bomb recognition and the response to the same. He has not testified in the past four years.

We intend to call Mr. Taylor 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.

Qualifications

Mr. Taylor received his initial training in explosives while attending the Naval Aviation Ordnanceman Course in the Naval Air Technical Training Unit. He received instruction on military, specifically Navy, bombs, missiles, rockets, air-dropped mines and how to store them, how to store explosives, how to operate explosives and munitions storage magazines, how to load those munitions on aircraft after assembling the fuse, and how to unload them and defuse them. After working in that field for a year, Mr. Taylor then became an apprentice for an explosive ordnance disposal team, where he learned the rudimentary aspects of diving, commercial and military explosives and their use, demolition.

Mr. Taylor then attended the Explosive Ordnance Disposal School, operated by the U.S. Navy, which is an intensive course attended by members of all branches of services for training to become explosive ordnance disposal technicians. Instruction about ordnance is provided by approximately a dozen countries about how to identify and render safe rockets, mines, missiles, and mortars and special weapons.

Mr. Taylor also served in the Navy during four deployment tours during the Vietnam War utilizing the training he had received to that point. In combat, Mr. Taylor and fellow military members were responsible for destroying caches of explosives and weapons. Mr. Taylor also cleared booby traps for multiple branches, including the Vietnamese military and the United States Army. Mr. Taylor was also service certified as a Master Explosives Ordnance Disposal technician during this time.

When Mr. Taylor left active duty service in the Navy in 1979, he became a member of the Active Naval Reserve in a Special Warfare Unit. That same year he joined the Bureau of Alcohol, Tobacco and Firearms (ATF), where he worked for 20 years as an explosives enforcement officer. His duties in that role included analyzing and classifying thousands of suspected IEDs, homemade bombs, and destructive devices, processing post-blast scenes, as well as conducting hundreds of rendering safe and exploiting procedures. He also provided consultation for local police

Page: 2

Text Replaced
[Old]: "airdrop"
[New]: "air-dropped"

Text Deleted
"taught about"

Text Replaced
[Old]: "an explosive magazine, how to load those"
[New]: "explosives and munitions storage magazines, how to load those munitions"

Text Replaced
[Old]: "rockets, mines, missiles, mortars."
[New]: "and render safe rockets, mines, missiles, and mortars and special weapons."

Text Inserted
"Taylor was also service certified as a Master Explosives Ordnance Disposal technician during this time."

Text Replaced
[Old]: "While serving on"
[New]: "Mr."

Text Deleted
"Beginning"

Text Replaced
[Old]: "active duty from 1964 to 1979, Mr. Taylor was awarded over a dozen medals, including two Bronze Stars with combat V, Navy commendations with the combat V, Presidential Unit Citations, Purple Heart, and the Vietnamese Cross of Gallantry, Brigade Level, for heroic activity. Mr."
[New]: "When Mr. Taylor left active duty service in the Navy"

Text Replaced
[Old]: "Mr. Taylor was"
[New]: "he became"

Text Deleted
"Taylor was also service certified as a Master Explosives Ordnance Disposal technician during this time."

Text Replaced
[Old]: "Unit, when"
[New]: "Unit. That same year"

departments, and ~~served as an affiant~~ for ten to twelve search warrants, , for which his representations in the affidavits pertained to explosives and ~~destructive~~ devices and their components

While employed by the ATF as an explosives enforcement officer, Mr. Taylor also created and supervised training programs in explosives and incendiaries, including the first post-blast post-certified course and developed a model for a recertification course.

Mr. Taylor served as ATF's lead explosive enforcement officer during the Oklahoma City bombing investigation, where his role included identifying potential explosives and destructive devices, both for safety and for evidentiary purposes, and rendering them safe, when necessary. His efforts also identified where the drums filled with explosives were manufactured and sold, other post-blast critical information, including a report of the device and positioning in the truck. Mr. Taylor was the primary EOD and explosives enforcement officer for the Waco incident. Mr. Taylor retained the suspect's IEDs as evidence and ensured that the compound was void of hazardous items. He was also responsible for providing a route free of explosive devices for the Hostage Rescue Team during the Ruby Ridge investigation, and was the senior explosive enforcement officer for other significant investigations.

During his 20-plus year ATF law enforcement career, Mr. Taylor received over 140 letters of recognition, including the ATF Medal of Valor, the Distinguished Service Award from the International Association of Bomb Technicians and Investigators and the United States Treasury Gallatin Award for exemplary service.

Throughout his career with the BATF, Mr. Taylor routinely worked with other agencies, including the Federal Bureau of Investigation, including teaching at the International Police Academy in Budapest, Hungary. Mr. Taylor also served as a consultant to the FBI during the investigation of the TWA 800 accident. During the days following the crash, he participated in closed daily briefings, to review the information and updates presented by witnesses and law enforcement, and provide

Page: 3

Text Replaced
[Old]: "and participated in serving over 100 search warrants."
[New]: ", for which his representations in the affidavits pertained to explosives and destructive devices and their components"

Text Inserted
"and"

Text Replaced
[Old]: "in leadership roles for investigations into the Oklahoma City Bombing as ATF's lead explosive enforcement officer wherein he participated in serving a search warrant, developed and identified critical information including keys to a storage location and where he checked for booby-traps and located explosives."
[New]: "as ATF's lead explosive enforcement officer during the Oklahoma City bombing investigation, where his role included identifying potential explosives and destructive devices, both for safety and for evidentiary purposes, and rendering them safe, when necessary."

Text Replaced
[Old]: "was also responsible for providing a safe path for travel for the Hazardous Rescue Team, during the Ruby Ridge investigation and was the primary EOD and explosives enforcement officer for the Waco incident. Mr. Taylor made first entry with one other law enforcement officer, located the last individual, retained that individual's IEDs as evidence, and ensured that the compound was void of hazardous items. He"
[New]: "was the primary EOD and explosives enforcement officer for the Waco incident. Mr. Taylor retained the suspect's IEDs as evidence and ensured that the compound was void of hazardous items. He was also responsible for providing a route free of explosive devices for the Hostage Rescue Team during the Ruby Ridge investigation, and"

Text Inserted
"Mr. Taylor also served as a consultant to the FBI during the investigation of the TWA 800 accident. During the days following the crash, he participated in closed daily briefings, to review the information and updates presented by witnesses and law enforcement, and provide"

consultation to then-Assistant Director in Charge of the New York field office about the possibility that an explosive device was involved in the incident.

After retiring from the ATF in 2000, Mr. Taylor continued working in the field of explosives and incendiaries and taught explosives and terrorism methods, including the FBI's International Police Academy Course in Quantico, Virginia, as well as developing a proactive course on Explosive Incident recognition for chemicals and components for the Institute of Intergovernmental Research (IIR). Mr. Taylor worked with a team that included members of the FBI to educate thousands of law enforcement officers in the United States.

Mr. Taylor was employed briefly by the State Department in the Middle East where he provided specific training to the Jordanian federal police and for classified anti-terrorism activity for the United States Army Office of Commissions, regarding explosive devices and their components.

Mr. Taylor has previously testified in federal court as an expert in the field of explosives and incendiary devices IEDs, and their uses, effects, and functioning, including in the District Court for the District of Colorado in 2018 and the Western District of Texas in 2021.

General Explosives Background

High Explosive. A material that is capable of sustaining a reaction front that moves through the unreacted material at a speed equal to or greater than that of sound in that medium [typically 1000 m/sec (3280 ft/sec); a material capable of sustaining a detonation. This definition comes verbatim from the National Fire Protection Association (NFPA), as a recognized authority.

Low Explosives and Deflagration. A deflagration is an explosion where the flame speed is lower than the speed of sound, which is approximately equal to 335 m/sec (750 mph). Explosives that deflagrate are known as low explosive (not low order explosive). The actual speed of the explosion can vary from 1–350 m/s (2–780 mph). Peak pressures produced by low explosives are orders of magnitude lower than those

Page: 4

Text Inserted
"consultation to then-Assistant Director in Charge of the New York field office about the possibility that an explosive device was involved in the incident."

Text Replaced
[Old]: "Commissions."
[New]: "Commissions, regarding explosive devices and their components."

Text Replaced
[Old]: "(3000"
[New]: "(3280"

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produced by high explosives, and the damage inflicted by low explosives can vary greatly depending on the fuel and confinement. For example, if black powder is ignited outside of containment, it just fizzles, but when it is confined, it creates an explosion that can propel bullets. In addition to the black powder example, examples of deflagrations involving low explosives include the ignition of propane gas for a cooking grill and fuel powering of a combustion engine in a car. This definition comes verbatim from the NFPA.

Blasting Agent. Any material or mixture, consisting of fuel and oxidizer, that is intended for blasting and not otherwise defined as an explosive; if the finished product, as mixed for use or shipment, cannot be detonated by means of a number 8 test blasting cap when unconfined. A number 8 test blasting cap is one containing 2 grams of a mixture of 80 percent mercury fulminate and 20 percent potassium chlorate, or a blasting cap of equivalent strength. An equivalent strength cap comprises 0.40-0.45 grams of PETN base charge pressed in an aluminum shell with bottom thickness not to exceed 0.03 of an inch, to a specific gravity of not less than 1.4 g/cc. and primed with standard weights of primer depending on the manufacturer. This definition comes from 27 CFR § 555.

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Page: 6

Text Deleted
"(typically air)"

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[Old]: "minimum:."
[New]: "minimum:"

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Typical non-electric bomb trains. Removing the safety pin on a grenade permits a mechanical component to strike a primer that spits a flame into a delay (the length of time fuse that burns when ignited). At the end of the burning delay, the time fuse spits flame into a non-electric blasting cap that has been positioned in the main charge.

Another example would be using a match or connected pull-friction igniter (initiator examples) to provide a spit of flame to ignite a length of hobby or

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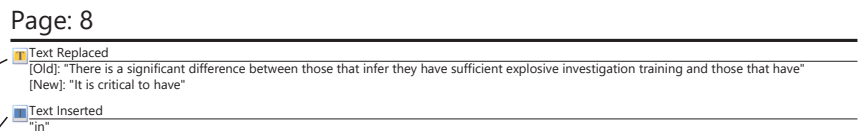

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-Various FBI/ BATFE introduction/identification of explosives/explosions training courses and documents.

-Military Technical manuals (TMs) that provide detailed information on Explosives and the explosive process and components.

-Fire protection Guide to Hazardous Materials that provides detailed information on chemicals that react violently or that can be used in IEDs, IIDs.

A trained explosives examiner should also have actual hands-on experience identifying and processing post blast scenes beginning with a scene involving an individual or a vehicle with just one or two experienced investigators. They should progress on to larger, more complex scenes.

Another near-mandatory experience is learning how to set up and correctly operate sifting operations as this involves taking an amount of gathered material (dirt, rocks, general debris, etc.) from a specific pre-marked post blast scene area and then identifying and documenting possible evidence for later analysis.

An investigator should also have basic knowledge of post blast scene parameters and requirements (size, hazards, obstacles, scene processing layout, security required, etc., and Scene Control (identification of people involved and others that enter and why) should be documented.

A trained explosives investigator should also have knowledge concerning Control Samples. These are collections logged into evidence via swabbings and small materials that are thought to be in an unaffected/clean area to rule out contamination already present. This eliminates, or identifies, areas that are inside the post blast

Page: 9

Text Replaced
[Old]: "INDIVIDUAL"
[New]: "individual"

Text Replaced
[Old]: "VEHICLE"
[New]: "vehicle"

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[Old]: "progess"
[New]: "progress"

Text Replaced
[Old]: "(ID"
[New]: "(identification"

process area that have no chemical link to the evidence, or that may have been previously contaminated legally or illegally which may provide false indicators as to the chemicals or explosives utilized.

Finally, evidence-recovery techniques to best preserve items/materials for laboratory analysis are a must for all stages of experience.

In summation, after receiving basic training in several disciplines, coupled with documented hands-on experience (as in multiple post blast scene work and evidence gathering/analysis), these individuals add credibility to the science of post blast scene processing and evidence collection/interpretation including assembling mock up devices that represent what device was employed and testing of live explosive mock up devices to duplicate or represent functioning and effects of the used device.

Process for bomb scene investigator

A qualified explosives examiner should:

1. Attempt to acquire information concerning the suspected target, size of the post blast area, current security, need for a bomb squad to make certain that there are no secondary IEDs in the immediate area, assemble required security tape, tools, and evidence containers plus documentation materials;

2. Identify the most outer perimeter and the area needing post blast processing (which can always be altered depending upon developing information);

3. Decide the type of search pattern to use: line, circular, quadrants, etc. that permits documenting evidence recovery locations;

4. Depending upon circumstances, and to prevent the loss of evidence, decide where to begin searching: close- in to what seems like the point of the explosion or at the farthest distance.

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5. Decide as early as possible the need for sifting operations to have equipment and trained personnel available;

6. Video or picture document the post-blast scene before any work is started;

7. Decide the need, and the where and when to acquire control samples on a continuous basis;

8. Properly, bag, tag and document evidence recovery, separate any evidence that could cause cross contamination (blood, explosive residence, chemicals);

9. Evaluate as much evidence as possible on scene for communication with the field investigating team;

10. Make informed decisions using input from witnesses and other trained personnel (laboratory, scientific and highly experienced post blast scene processors) on what is of evidentiary importance;

11. Properly secure and transport evidence maintaining/documenting a chain of custody.

Opinions and Conclusions

During the course of my evaluation of the materials and exhibits associated with this incident, I reviewed the following government discovery provided by defense counsel. I took the following information at face value for purposes of my analysis, but I cannot independently verify such evidence as fact.

- Exhibit 301-RARDE report, particularly the information on pages 8 and 9, which I then attempted to visually compare this information to Exhibits 302. 039, 302.040, 302.041, and to the computer-generated diagram in exhibit 302.031;
- Photographs from the RARDE report;

- Photographs of suitcase-loaded luggage containers prior to their explosion and associated results;
- Photographs of and notes of explosive testing;
- Other information provided from discovery documents.

No information was provided stating whether there were additional tests at different locations under different criteria other than what has been mentioned in the materials received for review and evaluation.

Variables that I considered in providing my opinion included:

- What was the actual condition of the luggage container involved in this incident such as handler abuse, dents or normal wear and tears. I presumed the condition to be used with expected dents and dings.
- How accurately the explosively damaged container pieces could be reassembled to provide precise measurements.
- That the pitting or dimpling marks in the diagram would be somewhat difficult to pinpoint within one or two centimeters during the reassembly process. Further, attesting to the accuracy of precise location to the pitting/cratering in relationship to the point of explosion is difficult for me to accept to the exclusion of all other scenarios without detailed proof. The point of explosion and the resulting damage can be documented to approximates, but consideration of variables should be noted.
- The position of the IED suitcase in the luggage container. Two possible positions are offered, but those are done without knowing the precise position of the Toshiba radio in the IED suitcase and the precise position of the explosive main charge within the radio. These are variables that I considered, and they can present probable changes to a final conclusion. In my opinion, the two positions offered are definitely to be considered but are not verified fact.

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Text Replaced
[Old]: "a couple of"
[New]: "one or two"

My conclusion was that the IED suitcase could have been touching the bottom of the luggage container or in proximity to the bottom and also touching or in proximity to the upward slanted side. I base this on the fact that the location of the Toshiba radio within the suitcase is unverified, the location of the explosive main charge within the Toshiba radio is unverified and the amount of the explosives used is unverified. However, the amount of explosives used and the damage documented does imply the use of a plastic high explosive and approximately a pound in weight that might equate to one brick of Semtex, the explosive that appears to be scientifically verified.

Additionally, the position of the clothes, their type and condition in relationship to the radio and the encased explosives could alter the precise position of the radio and the explosive charge. I did see what appears to be part of a radio speaker, but no indication that a second speaker was present.

Based upon my review and evaluation, and consideration given to these variables of which there probably more, I cannot state with professional certainty the precise location of the IED suitcase, the location of the radio within the suitcase, the location of the explosives main charge within the radio, nor the amount of explosives used. I don't disagree with the approximates provided, but not to the exclusion of other possibilities.

Having approximately fifty plus years of experience (1968 to 2021) involving explosive training, demolition work, post blast training and testing involving IEDs with known and unknown variables, I am aware that results can vary significantly depending upon the test criteria and parameters.

In conclusion, my opinion is that approximately one pound (453 grains), or one brick of high explosives, identified as Semtex by laboratory analysis, was positioned inside a radio that was positioned inside of a suitcase along with other clothing and items, and that this suitcase was touching or very close to the bottom of the luggage container and touching or close to the upward slanted side.

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Additionally, I am unable to reflect on the variables of what the vibrating aircraft in flight does to the entire scenario and what the pressure inside of that part of the aircraft means to the resulting effects and positions. It is also my opinion that adding in other materials and chemicals, or removing/deleting materials during testing will most likely provide somewhat different results.

Mr. Taylor will be offered as an expert witness in the in the field of explosives, both foreign and domestic, improvised explosive devices (IEDs), improvised incendiary devices (IIDs) and their components, assembly, functioning and effects. 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:

Jerry Taylor

Date: 8/11/2026 10:36:38 PM

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

Date: 8/11/2026 10:36:57 PM

Sincerely,

Date: 8/11/2026 10:36:40 PM

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

Counsel for Mr. Al-Marimi

Date: 8/11/2026 10:36:42 PM

Date: 8/11/2026 10:37:09 PM

Date: 8/11/2026 10:37:20 PM

Date: 8/11/2026 10:37:02 PM

Whitney Minter Date: 8/11/2026 11:01:27 PM