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CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AHMED RESSAM,

Defendant.

NO. CR99-666C

REDACTED TRANSCRIPT OF VIDEO
DEPOSITION OF KAMAL
DAHOUMANE TAKEN 10-25-00 &
PLAYED TO THE JURY DURING
TRIAL IN LOS ANGELES, CALIFORNIA
ON 4-3-01

REDACTED TRANSCRIPT OF VIDEO DEP OF
KAMAL DAHOUMANE TAKEN 10-25-00 & PLAYED
AT TRIAL 4-3-01
(AHMED RESSAM)

FEDERAL PUBLIC DEFENDER
1111 Third Avenue, Suite 1100
Seattle, Washington 98101
(206) 553-1100

THE COURT: Yes. I will ask him to wait outside until defense counsel has had an opportunity to see it, and the moment that we get it, I will stop and we will ask Mr. Hillier to look at it, to see if it's necessary to re-call you, and if not we will release you right away.

MR. GONZÁLEZ: Thank you.

MR. FILIPOVICH: Your Honor, this is Mike Filipovich. May I have a moment to have a brief consultation with Mr. Hillier on the secure phone?

THE COURT: Yes.

MR. HILLIER: Thank you, Your Honor.

(RECESS)

MR. GONZÁLEZ: Kamal Dahoumane, please.

THIS twenty-fifth (25th) day of October, two thousand (2000), PERSONALLY CAME AND DID APPEAR:

SANA LADKI,

WHO, UPON HAVING BEEN DULY SWORN, DID TRANSLATE FROM ENGLISH TO FRENCH AND FROM FRENCH TO ENGLISH, as follows:

THIS twenty-fifth (25th) day of October, two thousand
(2000), PERSONALLY CAME AND DID APPEAR:

KAMAL DAHOUMANE,

WHO, UPON HAVING BEEN DULY SWORN, DID DEPOSE AND SAY,
as follows:

[Reporter's note: Answers shown are as translated
unless indicated as "BY THE WITNESS"]

EXAMINATION BY MR. GONZÁLEZ

on behalf of Plaintiff:

MR. GONZÁLEZ: Q. Please go ahead and take a
seat, and remember to keep your voice up when you
answer, and look directly in front. Would you please
state your name and spell it for us?

A. (through the interpreter) My name is
Dahoumane, Kamal, D-A-H-O-U-M-A; Kamal, K-A-M-A-L.

THE INTERPRETER: Oh, there's an N-E at the end of
Dahoumane.

MR. GONZÁLEZ: Q. And your date of birth, please?

A. I was born in seventy-two ('72) -- no, no, on
the twenty-ninth (29th) of the twelfth (12th), which is
December, sixty-eight ('68), nineteen sixty-eight

(1968).

Q. And where were you born, sir?

A. In Algiers, in Algeria.

Q. And when did you first come to Canada?

A. I arrived in nineteen ninety-four (1994).

Q. And have -- are you finished, sir?

A. Yes, yes.

Q. And that was May of ninety-four ('94)?

A. May, May.

Q. And have you lived in any province aside from Quebec in Canada?

A. I was in Halifax for one (1) month only.

Q. Have you received any higher education?

A. Yes, I studied -- five (5) years of university studies.

Q. And where was that?

A. In Algiers.

Q. And what was your major study?

A. Engineer in cryogénie, thermodynamiques appliquées, thermodynamiques appliquées. Applied thermodynamic.

Q. And what languages do you speak?

A. I speak Arabic, French and English, and Berber. I've studied back in Algeria a bit of German.

BY THE WITNESS: And some Spanish. I was in Spain

for two (2), three (3) months.

A. (through the interpreter) And some Spanish.
I was in Spain for --

BY THE WITNESS: Two (2) month, three (3) month,
something like that.

A. (through the interpreter) Two (2), three (3)
months, something like that.

BY THE WITNESS: Before.

Q. All right. Do you have any brothers?

A. (through the interpreter) Yes, yes, I do have
brothers.

Q. And have any of your brothers lived in Canada?

A. Actually right now?

Q. No, sir, at any time?

A. Before, my brother was here.

Q. And what is your brother's name who lived in
Canada?

A. Abdel-Majid, A-B-D-E-L, hyphen, M-A-J-I-D.
Yes, that is correct, Abdel-Majid.

Q. And his family name I assume is the same?

A. Dahoumane -- already spelled.

Q. And is he your older or your younger brother?

A. Elder brother.

Q. And when did you first arrive in Canada?

A. I arrived here at Montreal at Mirabel,

M-I-R-A-B-E-L, yes, at the airport.

Q. And that's the local airport?

A. Yes, of Montreal.

Q. And was your brother already here, or did he come later?

A. No, no, he wasn't here.

Q. And if I could ask that even if you understand my question, please wait for the interpreter to finish --

A. All right.

Q. -- and then answer.

A. All right. No problem.

Q. When more or less did your brother come to Canada?

A. When, you mean the date?

Q. Yes?

A. Ninety-five ('95), but I think it was October, concerning the month. I don't know; I'm not sure. I think it was October.

Q. Do you know if your brother has ever travelled to the United States?

BY THE WITNESS: Never, no, no, no.

A. (through the interpreter) No, never, no, no, no. If he did go, I don't think he would have come back. I don't think so.

Q. Have you yourself been to the United States?

A. No, no, no.

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MR. GONZÁLEZ: Q. Whose name was on the lease at 6585 du Parc?

A. Dahoumane, Majid.

Q. Is that Abdelmajid Dahoumane?

A. Yes, yes.

Q. Was he in that apartment before you, or were you there before him?

A. Before, before.

THE INTERPRETER: The gentleman replied in Arabic.

MR. GONZÁLEZ: Q. Did your brother ever express an opinion about whether you should have visitors at the apartment or not?

A. It is not an opinion. He is like that. Each person is free to live the way he wants or he likes.

Q. Did he ever make any statements to you about that?

A. No, no, no. No, he's like that.

Q. He's like what?

A. He wants to live alone, just like that.

Q. Do you know where your brother Abdelmajid Dahoumane was in November and December of nineteen ninety-nine (1999)?

A. I think he was abroad. He was in Vancouver.

Q. When you say abroad --

A. No, I said in Vancouver, but he told me he was going to Vancouver. As for the date, I do not know it exactly.

Q. What's your best estimate?

A. It is difficult. It is very difficult because after all the problems, everything was mixed up. It is difficult.

Q. How about an estimate of how long he was gone?

A. Because sometimes I do not remain at home. I could not know. It is difficult as well.

Q. Was it more than six (6) months or less than six (6) months?

A. Less, less.

Q. And was it more than three (3) months or less than three (3) months?

A. Maybe two (2) months, three (3) months, three (3), I don't know. He said two (2) months. It is difficult.

Q. Okay. When about did he return?

A. As for that I do not remember very well, but it was during the month of Ramadan, R-A-M-A-D-A-N, which is the fast, during the fast.

Q. And for those who don't know, what month would that have been in nineteen ninety-nine (1999)?

A. It was in December.

Q. And would it have been at the beginning of December or the end when he returned?

A. This is difficult as well, because the period between the tenth (10th) and the twentieth (20th), I think he was in Montreal for ten (10) days or something like that, but as for the exact days --

Q. Did you actually see him in Montreal in December of nineteen ninety-nine (1999)?

A. Yes, yes, yes, sure.

Q. And did he tell you where he was going next?

A. No, no, he did not say that.

Q. Did he say whether he was staying in Canada or leaving Canada?

A. Normally he was supposed to -- he was supposed to stay in Canada, but I don't know.

Q. Did he tell you whether or not you should stay in Canada?

BY THE WITNESS: I will not answer this question.

A. (through the interpreter) I will not answer this.

MR. GONZÁLEZ: Your Honor, would you please direct the witness to answer the question.

THE COURT: You have to answer the question, sir.

A. (through the interpreter) It is not my father --

BY THE WITNESS: -- to tell me to stay or to go.

A. -- to tell me to stay or to go.

MR. GONZÁLEZ: Q. Did he tell you to stay or to go?

BY THE WITNESS: Perhaps I tell him to go, not me.

A. (through the interpreter) Perhaps I tell him to go, not me. Tell him it is since a long time he wanted to go. Because I didn't have any papers I wanted to go, but where to go, this is a problem.

Q. Did he suggest that you leave Canada?

A. No, no, not really.

Q. Do you recall also having a discussion before you took the stand here today?

A. Yes, yes.

Q. And did we discuss this same question about --

A. Yes, yes, yes.

Q. And was your answer the same at that time?

A. Yes, yes.

Q. Your brother never suggested that you leave Canada?

A. Do you want the truth?

BY THE WITNESS: When he was in Germany, I told him not to -- don't come in Canada.

A. (through the interpreter) When he was in Germany, I told him don't come to Canada.

BY THE WITNESS: This is what I told him.

A. (through the interpreter) This is what I told him.

BY THE WITNESS: And he wasn't happy in Canada, too.

A. (through the interpreter) And he wasn't happy in Canada, too.

BY THE WITNESS: He liked to go to United States for this.

A. (through the interpreter) He liked to go to the United States.

BY THE WITNESS: He was in Vancouver, he come to Montreal, he find Montreal is shit, he go to Vancouver, he find nothing. He like to go to United States. I don't think he like to make bomb in United States. It's not true. He tried to get the visa to United States two (2) times. I give you it. Look.

THE COURT: There is no question. Can you ask another question, please? No, no, ask another question.

A. (through the interpreter) Nineteen ninety (1990).

MR. GONZÁLEZ: Q. While he was with you in December of nineteen ninety-nine (1999), did you make any phone calls back to your family in Algeria?

A. Yes, yes.

Q. And who did you call back in Algeria?

A. My father, my brother.

Q. And did you make that call with your brother, Abdelmajid Dahoumane?

A. Yes, yes, yes.

Q. And did he bring anything back with him from his trip to Vancouver?

A. Gift. Gifts. Gifts.

Q. And what did you do with those?

BY THE WITNESS: I send it to Algeria.

A. (through the interpreter) I sent them to Algeria.

Q. Did you send them under your name or your brother's name?

A. Under the name of somebody.

Q. And when did you do that?

BY THE WITNESS: I don't remember. It's not important.

A. (through the interpreter) I do not remember. It's not important.

THE INTERPRETER: Should I carry on translating, or --

THE COURT: Please speak in French so it will be consistent, okay?

MR. GONZÁLEZ: Q. Was it sometime after December?

A. Yes, yes, after, due to the problems. Yes, I was at somebody for two (2), three (3) months; that's why I made it till later.

Q. Do you know where your brother is?

A. Somewhere in the nature.

Q. No further questions.

THE COURT: Ms. Oliver?

MS. OLIVER: No cross, Your Honor.

THE COURT: All right. You may be excused.

MR. DISKIN: Could we recess briefly, Your Honor, so Monsieur Labelle can deliver that to the RCMP, who want to review it for accuracy, and then we'll take the next step in making it available to Mr. Hillier.

THE COURT: Why don't you just have them come in and take a look at it now.

MR. DISKIN: Yes, Your Honor.

Me LABELLE: Mr. Diskin --

MR. DISKIN: They don't want me to have it until the RCMP sees it.

Your Honor, this is the report of the interview of Nabil Ikhlef, and I will hand it to Mr. Hillier here in a minute, but I wanted to report to Your Honor that I thought we were going to get faxed whatever it was he in fact signed. That's not the case. What we have is

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