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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.)
)
 NADIA PIROSKA MARIA ROCKWOOD,)
)
)
)
 Defendant.)

Case No.

PLEA AGREEMENT

Unless the parties jointly inform the Court in writing of any additional agreements, this document in its entirety contains the terms of the plea agreement between the defendant and the United States. This agreement is limited to the District of Alaska; it does not bind other federal, state, or local prosecuting authorities.

I. TERMS OF AGREEMENT, FEDERAL RULE OF CRIMINAL PROCEDURE 11, WAIVER OF CLAIM FOR ATTORNEY'S FEES AND COSTS

A. Terms of Agreement

The defendant agrees to plead guilty to Count 1 of the Information in this case which charges her with Making False Statements in violation of 18 U.S.C. § 1001(a)(2). The United States agrees not to prosecute the defendant further, based upon facts now known, for any other offense related to the events that resulted in the charges contained in the Information. The parties agree pursuant to Fed.R.Crim.P. 11(c)(1)(C) that the provisions of the United States Sentencing Commission Guidelines (Guidelines) as detailed in Section III of this agreement shall apply to the defendant and further agree that the defendant shall be sentenced to a term of five years probation which can be served in the United Kingdom, the defendant's country of origin. The parties agree that the defendant and the United States may withdraw from this agreement or the guilty plea only if the court does not adopt the parties' agreement as to the Guideline provisions and

the sentence that shall be imposed in this case. The defendant will waive all rights to appeal the conviction and sentence imposed under this agreement, and will waive all rights to collaterally attack the conviction and sentence, except on the grounds of ineffective assistance of counsel or the voluntariness of the plea(s). Unless the parties inform the district court in writing of any additional agreements, this document contains the complete plea agreement between the defendant and the United States. The parties expressly agree that this agreement binds the District of Alaska, it does not bind other federal, state, or local prosecuting authorities.

B. Federal Rule of Criminal Procedure 11

Unless the parties otherwise inform the Court in writing, Federal Rule of Criminal Procedure 11(c)(1)(A) and (C) will control this plea agreement. If the Court accepts this plea agreement then the court is bound by the parties sentencing agreement as to the specific provisions of the Guidelines that apply and the sentence of probation that shall be imposed in this case. The United States and the defendant may withdraw from this agreement only if the court rejects this agreement.

C. Waiver of Claim for Attorney Fees and Costs

Because this is a negotiated resolution of the case, the parties waive any claim for the award of attorney fees and costs from the other party.

II. CHARGES, ELEMENTS, FACTUAL BASIS, STATUTORY PENALTIES AND OTHER MATTERS AFFECTING SENTENCE, FORFEITURE

A. Charges

1. The defendant agrees to plead guilty to Count I of the Information filed in this case charging her with Making Material False Statements in violation of 18 U.S.C. § 1001(a)(2). The defendant further agrees to waive presentment of this matter to the grand jury.

B. Elements

The elements of the charges to which the defendant is pleading guilty are as follows:

FIRST: NADIA PIROSKA MARIA ROCKWOOD, made a false statement in a matter within the jurisdiction of the Federal Bureau of Investigation;

SECOND: that NADIA PIROSKA MARIA ROCKWOOD, acted willfully, that is deliberately and with knowledge that the statement was untrue;

THIRD: the statement was material to the Federal Bureau of Investigation's activities or decisions in that it had a natural tendency to influence, or was capable of influencing, the decisions or activities of the Federal Bureau of Investigation.

C. Factual Basis

The defendant admits the truth of the allegations in Count 1 of the Information and the truth of the following statement, and the parties stipulate that the Court may rely upon this statement to support the factual basis for the guilty plea(s) and for the imposition of the sentence.

NADIA PIROSKA MARIA ROCKWOOD's (NADIA ROCKWOOD) husband, Paul Rockwood, converted to Islam in late 2001 or early 2002. After his conversion to Islam, Paul Rockwood began to study the teachings of the American born Islamic cleric, Anwar al-Awlaki (Al-Awlaki) who has professed hatred for, and supported terrorist acts against, the United States government. NADIA ROCKWOOD was aware of her husband's growing adherence to Al-Awlaki's ideology.

At a time unknown, but prior to moving to Alaska in 2006, Paul Rockwood began visiting websites on the internet that professed to identify individuals, including American servicemen, who were alleged by the websites to have committed crimes of violence against Muslim civilians. NADIA ROCKWOOD was aware of her husband's interest and belief in the statements he read on the websites.

NADIA ROCKWOOD was aware that sometime in late 2009 Paul

Rockwood began to voice his hatred for the individuals identified on the websites he was visiting including voicing his desire to seek revenge on the individuals identified on the websites. By early 2010, Paul Rockwood had created a list of the individuals he had identified for revenge from the websites for the purpose of sharing the names with another individual who Paul Rockwood believed supported revenge against those who committed crimes of violence against Muslims and against Islam.

Thereafter, and in April, 2010, Paul Rockwood gave his written list to NADIA ROCKWOOD for the purpose of delivering the list to the individual who Paul Rockwood believed shared his beliefs. In April, 2010, and while on a trip to Anchorage from King Salmon, NADIA ROCKWOOD knowingly delivered an envelope to the individual Paul Rockwood believed shared his beliefs with the knowledge that it contained a list of individuals against whom her husband had expressed a desire to seek revenge including the desire that they be punished for their believed acts against Muslims and against Islam. The list was subsequently obtained by investigators of the Federal Bureau of Investigation's Joint Terrorism Task Force ("JTTF")

On May 19, 2010, NADIA ROCKWOOD was interviewed in Anchorage, Alaska by agents of the JTTF. During the interview, JTTF agents questioned

NADIA ROCKWOOD about delivering Paul Rockwood's list to another person during her trip to Anchorage. In response to investigators' questions, NADIA ROCKWOOD knowingly provided materially false statements and explanations about delivering to another person what she believed to be a document created by her husband, including deceptively claiming that she delivered only a book or a common letter to another person, among other materially false and deceptive explanations. In truth and fact, NADIA ROCKWOOD knew what she delivered to another person included a list created by her husband containing the names of individuals who were at risk of harm.

D. Statutory Penalties and Other Matters Affecting Sentence

1. Statutory Penalties

The statutory penalties applicable to the charges to which the defendant is pleading guilty, based on the facts to which the defendant will admit in support of the guilty pleas, are as follows:

Count 1: False Statements to a Federal Agent, in violation to 18 U.S.C. §1001(a)(2).

- 1) a maximum term of 5 years imprisonment;
- 2) a maximum \$250,000 fine;

- 3) a maximum term of 3 years of supervised release; and
- 4) a \$100 mandatory special assessment.

2. Other Matters Affecting Sentence

a. Conditions affecting the defendant's sentence

The following conditions may also apply and affect the defendant's sentence: 1) pursuant to Comment 7 of U.S.S.G. § 5E1.2, the Court may impose an additional fine to pay the costs to the government of any imprisonment and supervised release term; 2) pursuant to 18 U.S.C. § 3612(f), unless otherwise ordered, if the Court imposes a fine of more than \$2,500, interest will be charged on the balance not paid within 15 days after the judgment date; 3) upon violating any condition of probation, a further term of imprisonment equal to the period of probation may be imposed, with no credit for the time already spent on probation; 4) the Court may order the defendant to pay restitution pursuant to 18 U.S.C. § 3663 and U.S.S.G. § 5E1.1. The parties agree that the defendant is unable to pay a fine in this case.

b. Payment of Special Assessment

The defendant agrees to pay the entire special assessment of \$100 in this case on the day the Court imposes the sentence. All payments will be by check or money order, and are to be delivered to the Clerk of Court, United States

District Court, 222 W. 7th Ave. Box 4, Rm. 229, Anchorage, AK 99513-7564.

c. Consequences of Felony Conviction

Any person convicted of a federal felony offense may lose or be denied federal benefits including any grants, loans, licenses, food stamps, welfare or other forms of public assistance, as well as the right to own or possess any firearms, the right to vote, the right to hold public office, and the right to sit on a jury. If applicable, any defendant who is not a United States citizen, may be subject to deportation from the United States following conviction for a criminal offense and will not be permitted to return unless the defendant specifically receives the prior approval of the United States Attorney General. With respect to this particular matter, and given that the defendant is a citizen of the United Kingdom, certain difficulties may arise with travel between the United States and the United Kingdom as a result of this felony conviction.

III. JOINT SENTENCING RECOMMENDATIONS

A. Advisory United States Sentencing Guidelines

The Court must consult the advisory United States Sentencing Commission Guidelines as well as the factors set forth in 18 U.S.C. § 3553(a) when considering the sentence to impose. The U.S.S.G. do not establish the statutory maximum or minimum sentence applicable to the offenses to which the defendant

is pleading guilty. The U.S.S.G. are not mandatory and the Court is not bound to impose a sentence recommended by the U.S.S.G.

B. Guideline Application Agreements

The parties have agreed that the guideline calculations set forth below apply to the facts of this case.

AGREED GUIDELINES CALCULATIONS:

Count 1:

Base Offense Level (§2B1.1)	6
Specific Offense Characteristics (§2B1.1(b))	+0
Subtotal	6
Acceptance of Responsibility (§3E1.1)	-2
Total	4
Criminal History Category	1
Estimated Advisory Guidelines Range	0-6 months
<i>SUPERVISED RELEASE</i>	<i>THREE YEARS</i>
<i>PROBATION</i>	<i>FIVE YEARS</i>
<i>FINE RANGE</i>	<i>Parties Agree Defendant Unable to Pay a Fine</i>

1. Acceptance of responsibility

Subject to the defendant satisfying the criteria set out in U.S.S.G. § 3E1.1 and the applicable application notes, the United States agrees to recommend the defendant for a two level downward adjustment for acceptance of responsibility and, if U.S.S.G. § 3E1.1(b) applies and additional one level departure. If, at any time prior to imposition of the sentence, the defendant fails to fully satisfy the criteria set out in U.S.S.G. § 3E1.1, or acts in a manner inconsistent with acceptance of responsibility, the United States will not make or, if already made, will withdraw this recommendation and motion.

C. Sentencing Agreement

The parties agree, pursuant to Federal Rule of Criminal Procedure 11(c)(1)(C), that the sentence to be imposed under this agreement is to be a term of five years probation. In addition, the parties agree that the defendant is unable to pay a fine. The United States Probation Office will prepare the defendant's pre-sentence report which will include a calculation of the defendant's sentencing range under the U.S.S.G.

IV. WAIVER OF TRIAL, APPELLATE RIGHTS, AND COLLATERAL ATTACK RIGHTS

A. Trial Rights

Being aware of the following, the defendant waives these trial rights:

- If pleading to an information, the right to have the charges presented to the grand jury prior to entering the guilty plea;
- The right to a speedy and public trial by jury on the factual issues establishing guilt or any fact affecting the mandatory minimum and statutory penalties, and any issue affecting any interest in any assets subject to forfeiture;
- The right to object to the composition of the grand or trial jury;
- The right to plead not guilty or to persist in that plea if it has already been made;
- The right to be presumed innocent and not to suffer any criminal penalty unless and until the defendant's guilt is established beyond a reasonable doubt;
- The right to be represented by counsel at trial and if necessary to have a counsel appointed at public expense to represent the defendant at trial -- the defendant is not waiving the right to

have counsel continue to represent the defendant during the sentencing phase of this case;

- The right to confront and cross examine witnesses against the defendant, and the right to subpoena witnesses to appear in the defendant's behalf;
- The right to remain silent at trial, with such silence not to be used against the defendant, and the right to testify in the defendant's own behalf;
- The right to contest the validity of any searches conducted on the defendant's property or person; and

B. Appellate Rights

The defendant waives the right to appeal the conviction(s) resulting from the entry of guilty plea(s) to the charges set forth in this agreement. The defendant further agrees that if the Court imposes a sentence that does not exceed the statutory maximum penalties— as set forth in section II D above in this agreement, the defendant waives without exception the right to appeal on all grounds contained in 18 U.S.C. § 3742 the sentence the Court imposes— including forfeiture (if applicable) or terms or conditions of probation (if applicable) or

supervised release, and any fines or restitution, and the right to appeal the district court's rulings on any subsequent motions under 18 U.S.C. § 3582(c).

C. Collateral Attack Rights

The defendant agrees to waive all rights to collaterally attack the resulting conviction(s) and/or sentence – including forfeiture (if applicable) or terms or conditions of probation (if applicable) or supervised release, and any fines or restitution – the Court imposes. The only exceptions to this collateral attack waiver are as follows: 1) any challenge to the conviction or sentence alleging ineffective assistance of counsel -- based on information not now known to the defendant and which, in the exercise of reasonable diligence, could not be known by the defendant at the time the Court imposes sentence; and 2) a challenge to the voluntariness of the defendant's guilty plea(s).

V. ADDITIONAL AGREEMENTS BY UNITED STATES

In exchange for the defendant's guilty plea(s) and the Court's acceptance of the defendant's plea and the terms of this agreement, the United States agrees that it will not prosecute the defendant further for any other offense -- now known -- arising out of the subject of the investigation related to the charges brought in the indictment in this case and the defendant's admissions set forth in Section II C. Provided, however, if the defendant's guilty plea(s) is/are rejected, withdrawn,

vacated, reversed, or set aside, or if the defendant's sentence is vacated, reversed, set aside, or modified, at any time, in any proceeding, for any reason, the United States will be free to prosecute the defendant on all charges arising out of the investigation of this case including any charges dismissed pursuant to the terms of this agreement, which charges will be automatically reinstated as well as for perjury and false statements.

VII. ADEQUACY OF THE AGREEMENT

Pursuant to Local Criminal Rule 11.2 (d)(7)(A) &(B) and (9), this plea agreement is appropriate in that the charges adequately reflect the seriousness of the offenses and it conforms with the sentencing goals that would otherwise be applicable to the defendant's case if the defendant had gone to trial and had been convicted on Count 1 of the charging instrument.

VIII. THE DEFENDANT'S ACCEPTANCE OF THE TERMS OF THIS PLEA AGREEMENT

I, NADIA PIROSKA MARIA ROCKWOOD, the defendant, affirm this document contains all of the agreements made between me— with the assistance of my attorney— and the United States regarding my plea(s). There are no other promises, assurances, or agreements the United States has made or entered into with me that have affected my decision to enter any plea of guilty or to enter into this agreement. If there are any additional promises, assurances, or agreements, I

and the United States will jointly inform the Court in writing before I enter my guilty plea(s).

I understand that no one, including my attorney, can guarantee the outcome of my case or what sentence the Court may impose if I plead guilty. If anyone, including my attorney, has done or said anything other than what is contained in this agreement, I will inform the Court when I stand before it to enter my plea. If there were, I would so inform the Court.

I enter into this agreement understanding and agreeing that the conditions set forth herein are obligatory and material to this agreement and that any failure on my part to fulfill these obligations will constitute a material breach of this agreement. If I breach this agreement, I agree the United States, in its sole discretion, may withdraw from this agreement and may reinstate prosecution against me on any charges arising out of the investigation in this matter. If my compliance with the terms of this plea agreement becomes an issue, at an appropriate hearing, during which I agree any of my disclosures will be admissible, the Court will determine whether or not I have violated the terms of this agreement. I understand the government's burden to prove a breach will be by a preponderance of the evidence.

I understand the Court will ask me under an oath to answer questions about the offense(s) to which I am pleading guilty and my understanding of this plea agreement. I understand that I may be prosecuted if I make false statements or give false answers and may suffer other consequences set forth in this agreement.

I have read this plea agreement carefully and understand it thoroughly. I know of no reason why the Court should find me incompetent to enter into this agreement or to enter my plea(s). I enter into this agreement knowingly and voluntarily. I understand that anything that I discuss with my attorney is privileged and confidential, and cannot be revealed without my permission. Knowing this, I agree that this document will be filed with the Court.

I am fully satisfied with the representation given me by my attorney and am prepared to repeat this statement at the time I stand before the Court and enter my guilty plea(s). My attorney and I have discussed all possible defenses to the charges to which I am pleading guilty. My attorney has investigated my case and followed up on any information and issues I have raised to my satisfaction. My attorney has taken the time to fully explain the legal and factual issues involved in my case to my satisfaction. We have discussed the statutes applicable to my offense and sentence as well as the possible effect the U.S.S.G. may have on my sentence.

Based on my complete understanding of this plea agreement, I therefore wish to enter a plea of guilty to Count 1 of the Information.

DATED: 7/20/10


NADIA PIROSKA MARIA ROCKWOOD
Defendant

As counsel for the defendant, I have discussed with the terms of this plea agreement with the defendant, have fully explained the charge(s) to which the defendant is pleading guilty and the necessary elements, all possible defenses, and the consequences of a guilty plea to a felony. Based on these discussions, I have no reason to doubt that the defendant is knowingly and voluntarily entering into this agreement and entering a plea of guilty. I know of no reason to question the defendant's competency to make these decisions. If, prior to the imposition of sentence, I become aware of any reason to question the defendant's competency to enter into this plea agreement or to enter a plea of guilty, I will immediately inform the court.

DATED: 7/20/2010

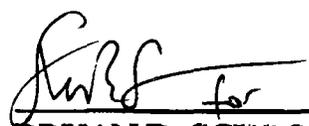

JAMES WENDT
Attorney for NADIA PIROSKA
MARIA ROCKWOOD

On behalf of the United States, the following accept NADIA PIROSKA MARIA ROCKWOOD's offer to plead guilty under the terms of this plea agreement.

DATED: 7/20/2010


STEVEN E. SKROCKI
Assistant U.S. Attorney

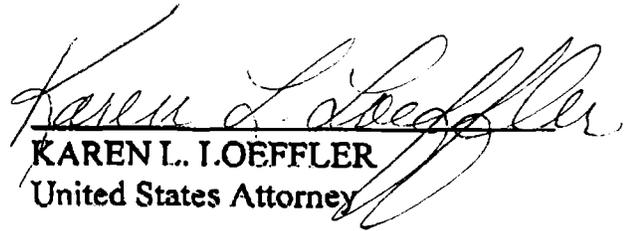
DATED: 7/20/2010


BRYAN D. SCHRODER
Assistant U.S. States Attorney

DATED: July 20, 2010


PAUL AHERN
United States Department of Justice
National Security Division
Counterterrorism Section

DATED: July 20, 2010


KAREN L. IOEFFLER
United States Attorney