

No.	Fact	Cite
1.	The group now known as Islamic State of Iraq and the Levant (“ISIL”) or the Islamic State of Iraq and Syria (“ISIS”) has used over 31 aliases over the past 15 years, including, but not limited to, al-Qa’ida in Iraq; al-Qa’ida Group of Jihad in Iraq; al-Qa’ida Group of Jihad in the Land of the Two Rivers; al-Qa’ida in Mesopotamia; al-Qa’ida in the Land of the Two Rivers; al-Qa’ida of Jihad in Iraq; al-Qa’ida of Jihad Organization in the Land of the Two Rivers; al-Qa’ida of the Jihad in the Land of the Two Rivers; al-Tawhid; Jama’at al-Tawhid Wa’al-Jihad; Tanzeem Qa’idat al Jihad/Bilad al Raafidaini; Tanzim Qa’idat al-Jihad fi Bilad al-Rafidayn; The Monotheism and Jihad Group; The Organization Base of Jihad/Country of the Two Rivers; The Organization Base of Jihad/Mesopotamia; The Organization of al-Jihad’s Base in Iraq; The Organization of al-Jihad’s Base in the Land of the Two Rivers; The Organization of al-Jihad’s Base of Operations in Iraq; The Organization of al-Jihad’s Base of Operations in the Land of the Two Rivers; The Organization of Jihad’s Base in the Country of the Two Rivers; al-Zarqawi Network; Islamic State in Iraq; Islamic State in Iraq and al-Sham; Islamic State in Iraq and Syria; ad-Dawla al-Islamiyya fi al-’Iraq wa-sh-Sham; Daesh; Dawla al Islamiya; Al-Furqan Establishment for Media Production; Islamic State.	United States Department of State, <i>2016 Country Reports on Terrorism: Chapter 6: Foreign Terrorist Organizations</i> (2016) at 27-31 (under the heading for “Islamic State of Iraq and Syria”), available at https://www.state.gov/j/ct/rls/crt/2016/272238.htm (hereinafter “State Dept. 2016 Country Report on Terrorism”); see also U.S. Department of Treasury, <i>Treasury Designates Six Al-Qaida Terrorists</i> (Sept. 24, 2003), available at https://www.treasury.gov/press-center/press-releases/Pages/js757.aspx ; at 1; see also See United States Department of State, <i>Country Reports on Terrorism: Chapter 6; Foreign Terrorist Organizations</i> (2013) (under the heading for “Al-Qa’ida in Iraq”), available at https://www.state.gov/j/ct/rls/crt/2013/224829.htm (hereinafter, “State Dept. 2013 Country Report on Terrorism”); see also Global Security, <i>Al-Qaeda in Iraq</i> (June 13, 2014), available at https://www.globalsecurity.org/military/world/para/aqi-2.htm ; see also United Nations, <i>Security Council Committee Adds Seven A.K.A.’s of One Entity in Al-Qaida Section of Its Consolidated List</i> (Dec. 6, 2004), available at https://www.un.org/press/en/2004/sc8260.doc.htm . [Reports cited in FR, at n. 6, 14, 15, 18, 20, and 24.]
2.	ISIL founder Abu Musab al-Zarqawi (“al-Zarqawi”) was a close associate of Osama bin Laden.	United Nations Security Council, <i>Security Council Committee Pursuant to Resolutions 1267 (1999) 1989 (2011) and 2253 (2015) Concerning ISIL (Da’esh) Al-Qaida and Associated Individuals Groups Undertakings and Entities</i> (Jan. 18, 2018), available at https://www.un.org/sc/suborg/en/sanctions/1267/aq_sanctions_list/summaries/entity/al-qaida-in-iraq ; see also ECF No. 49, at ¶ 3. [Report cited in FR, at n. 9.]

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3.	Al-Zarqawi arranged for training for Jordanian terrorists in al-Qaida camps.	U.S. Department of Treasury, <i>Treasury Designates Six Al-Qaida Terrorists</i> (Sept. 24, 2003), at 1, available at https://www.treasury.gov/press-center/press-releases/Pages/js757.aspx . [Report cited in FR, n. 6.]
4.	Zarqawi's operatives began to arrive in Afghanistan in large numbers in 1999 and "[s]ome of these operatives trained at al-Qaida's al-Faruq Camp, where they received full support from al-Qaida."	U.S. Department of Treasury, <i>Treasury Designates Six Al-Qaida Terrorists</i> (Sept. 24, 2003), available at https://www.treasury.gov/press-center/press-releases/Pages/js757.aspx ; see also Global Security, <i>Al-Qaeda in Iraq</i> (June 13, 2014), available at https://www.globalsecurity.org/military/world/para/aqi-2.htm . [Reports cited in FR, at n. 6, 18.]
5.	In October 2000, al-Zarqawi was indicted in absentia in Jordan for his role in the al-Qaida Millennium bombing plot targeting the Radisson SAS hotel in Ammam, among other targets.	U.S. Department of Treasury, <i>Treasury Designates Six Al-Qaida Terrorists</i> (Sept. 24, 2003), at 2, available at https://www.treasury.gov/press-center/press-releases/Pages/js757.aspx . [Report cited in FR, at n. 6.]
6.	"[U]nder the regime of Saddam Hussein, [al-]Zarqawi and his network found refuge in Iraq and Zarqawi himself was treated in a Baghdad hospital."	U.S. Department of Treasury, <i>Treasury Designates Six Al-Qaida Terrorists</i> (Sept. 24, 2003), at 1, available at https://www.treasury.gov/press-center/press-releases/Pages/js757.aspx . [Report cited in FR, at n. 6.]
7.	Al-Zarqawi's network also "established a poisons and explosives training camp in Northwest Iraq."	U.S. Department of Treasury, <i>Treasury Designates Six Al-Qaida Terrorists</i> (Sept. 24, 2003), at 1, available at https://www.treasury.gov/press-center/press-releases/Pages/js757.aspx . [Report cited in FR, at n. 6.]
8.	Al-Zarqawi provided financial and material support for the October 28, 2002, assassination of U.S. diplomat Laurence Foley, an officer with U.S. Agency for International Development, which was planned and executed, in part, by al-Qaida.	U.S. Department of Treasury, <i>Treasury Designates Six Al-Qaida Terrorists</i> (Sept. 24, 2003), at 1-2, available at https://www.treasury.gov/press-center/press-releases/Pages/js757.aspx ; see also United States Department of State, <i>2008 Country Reports on Terrorism: Chapter 6 Terrorist Organizations</i> (2008) at 26 (under section for "Al-Qa'ida in Iraq"), available at https://www.state.gov/j/ct/rls/crt/2008/122449.htm ; see also United States Department of State, <i>2007 Country Reports on</i>

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		<p><i>Terrorism: Chapter 6 Foreign Terrorist Organizations</i> (2007) at 23 (under section for “Al-Qaida in Iraq (AQI)”), available at https://www.state.gov/j/ct/rls/crt/2006/82738.htm (hereinafter, “State Dept. 2007 Country Report on Terrorism”); see also United States Department of State, <i>2005 Country Reports, Chapter 6: Terrorist Groups</i>, at 36 (under section for “Tanzim Qa’idat al-Jihad fi Bilad al-Rafidayn (QJBR)”), available at https://www.state.gov/j/ct/rls/crt/45394.htm (hereinafter, “State Dept. 2005 Country Report on Terrorism”). [Reports cited in FR, at n. 3, 6, 10, 16, 17.]</p>
9.	<p>Soon after U.S. forces arrived in Iraq with the commencement of Operation Iraqi Freedom, al-Zarqawi’s network established cells in Iraq to “bring together jihadists and other insurgents in Iraq fighting against US and Coalition forces.”</p>	<p>State Dept. 2005 Country Report on Terrorism at 36; see also State Dept. 2016 Country Report on Terrorism, at 27; see also ECF No. 49, at ¶¶ 3-4. [Reports cited in FR at n. 3, 10, 20, 24.]</p>
10.	<p>By 2004, Al-Zarqawi’s network was known primarily as Jama’at al-Tawhid wa-al Jihad.</p>	<p>United States Department of State, <i>Foreign Terrorist Organization: Designation of Jama’at al-Tawhid wa’al-Jihad and Aliases</i> (Oct. 15, 2004), available at https://2001-2009.state.gov/r/pa/prs/ps/2004/37130.htm; United Nations Security Council, <i>Security Council Committee Pursuant to Resolutions 1267 (1999) 1989 (2011) and 2253 (2015) Concerning ISIL (Da’esh) Al-Qaida and Associated Individuals Groups Undertakings and Entities</i> (Jan. 18, 2018), at 2, available at https://www.un.org/sc/suborg/en/sanctions/1267/aq_sanctions_list/summaries/entity/al-qaida-in-iraq; see also 69 Fed. Reg. 61292 (Oct. 15, 2004). [Reports cited in FR, at n. 7-9.]</p>
11.	<p>In 2004, Jama’at al Tawhid wa’al-Jihad’s “main goal [was] to undermine the establishment of a free and pluralistic Iraqi state by fomenting civil war in Iraq.”</p>	<p>United States Department of State, <i>Foreign Terrorist Organization: Designation of Jama’at al-Tawhid wa’al-Jihad and Aliases</i> (Oct. 15, 2004), available at https://2001-2009.state.gov/r/pa/prs/ps/2004/37130.htm. [Report cited in FR, at n. 7-8.]</p>

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12.	By at least 2004, Jama'at al Tawhid wa'al-Jihad had “publicly admitted responsibility for the brutal abductions and videotaped executions of seven civilians,” as well as “the assassinations of the former Iraqi Governing Council President, the governor of Mosul, and U.S. diplomat Laurence Foley. . . .”	United States Department of State, <i>Foreign Terrorist Organization: Designation of Jama'at al-Tawhid wa'al-Jihad and Aliases</i> (Oct. 15, 2004), available at https://2001-2009.state.gov/r/pa/prs/ps/2004/37130.htm . [Report cited in FR at n. 7-8.]
13.	Jama'at al Tawhid wa'al-Jihad “specifically targets those Iraqi’s attempting to rebuild their country and provide for its security. Hundreds of innocent Iraqis have died and many hundreds more have been injured during the last year in the group’s targeted bombings throughout Iraq – in Mosul, Baqouba, Falujah, Ramadi, Najaf, and Baghdad. The group was also responsible for the U.N. headquarters bombing in Baghdad which killed U.N. Special Representative of the Secretary General for Iraq, Servio Vieira de Mello.”	United States Department of State, <i>Foreign Terrorist Organization: Designation of Jama'at al-Tawhid wa'al-Jihad and Aliases</i> (Oct. 15, 2004), available at https://2001-2009.state.gov/r/pa/prs/ps/2004/37130.htm ; see also United Nations Security Council, <i>Security Council Committee Pursuant to Resolutions 1267 (1999) 1989 (2011) and 2253 (2015) Concerning ISIL (Da'esh) Al-Qaida and Associated Individuals Groups Undertakings and Entities</i> (Jan. 18, 2018), at 2, available at https://www.un.org/sc/suborg/en/sanctions/1267/aq_sanctions_list/summaries/entity/al-qaida-in-iraq . [Reports cited in FR, at n. 7-9.]
14.	In October 2004, al-Zarqawi publicly pledged his group’s allegiance to bin Laden, and bin Laden publicly endorsed al-Zarqawi as al-Qaida’s leader in Iraq.	ECF No. 49, at ¶ 4; see also United Nations Security Council, United Nations Security Council, <i>Security Council Committee Pursuant to Resolutions 1267 (1999) 1989 (2011) and 2253 (2015) Concerning ISIL (Da'esh) Al-Qaida and Associated Individuals Groups Undertakings and Entities</i> (Jan. 18, 2018), at 2, available at https://www.un.org/sc/suborg/en/sanctions/1267/aq_sanctions_list/summaries/entity/al-qaida-in-iraq ; see also United States Department of State, <i>Addition of Al-Manar to the Terrorist Exclusion List</i> (Dec. 28, 2004) (On October 17, 2004, “Abu-Mus’ab al-Zarqawi pledged his group’s allegiance to al-Qaida and its leader, Usama bin Laden.”), available at https://2001-2009.state.gov/r/pa/prs/ps/2004/40081.htm . [Reports cited in FR at n. 9, 11, 13.]

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15.	Following this pledge, Zarqawi's group issued statements on October 20, 2004, on jihadist websites claiming responsibility for recent anti-U.S. attacks in Iraq.	United States Department of State, <i>Addition of Al-Manar to the Terrorist Exclusion List</i> (Dec. 28, 2004), available at https://2001-2009.state.gov/r/pa/prs/ps/2004/40081.htm ; see also United States Department of State, State Dept. 2005 Country Report on Terrorism at 22; see also Global Security, <i>Al-Qaeda in Iraq</i> (June 13, 2014) at 3, available at https://www.globalsecurity.org/military/world/para/aqi-2.htm . [Reports cited in FR, at n. 3, 10, 11, 13, 18.]
16.	Al-Qaida (a.k.a Usama Bin Ladin Organization) “[m]erged with Abu Musab al-Zarqawi’s organization in Iraq in late 2004, with al-Zarqawi’s group changing its name to ‘Qa’idat al-Jihad fi Bilad al-Rafidayn’ (al-Qa’ida in the Land of the Two Rivers).”	State Dept. 2005 Country Report on Terrorism at 18 (under section for “Al-Qa’ida a.k.a. Usama Bin Ladin Organization”); see also United Nations Security Council, <i>Security Council Committee Pursuant to Resolutions 1267 (1999) 1989 (2011) and 2253 (2015) Concerning ISIL (Da’esh) Al-Qaida and Associated Individuals Groups Undertakings and Entities</i> (Jan. 18, 2018), at 2, available at https://www.un.org/sc/suborg/en/sanctions/1267/aq_sanctions_list/summaries/entity/al-qaida-iniraq ; ECF No. 49, at ¶ 4 (identifying that “al-Zarqawi’s group adopted the name al-Qa’ida in Iraq (‘AQI’).”). [Report cited in FR at n. 3, 9-10.]
17.	From the time of the October 2004 merger with al-Qaida and “continuing through the time the U.S. and coalition forces left Iraq in 2011, AQI conducted fatal terrorist attacks against those forces, even after al-Zarqawi was killed by an airstrike in June 2006.”	ECF No. 49, at ¶ 4.
18.	“[T]he organization continued to engage in terrorist activities and claimed responsibility for the October 24 th [2004] massacre of 49 unarmed, out-of-uniform Iraqi soldiers and the October 26 th [2004] kidnapping and beheading of Japanese citizen Shosei Koda.”	United States Department of State, <i>Addition of Al-Manar to the Terrorist Exclusion List</i> (Dec. 28, 2004), available at https://2001-2009.state.gov/r/pa/prs/ps/2004/40081.htm . [Report cited in FR at n. 11, 13.]

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19.	The group now known as ISIL claimed responsibility for the 2004 beheadings of three Americans, Nicholas Berg, Jack Armstrong, and Jack Hensley.	State Dept. 2007 Country Report on Terrorism at 23; <i>see also</i> United States Department of State, <i>Foreign Terrorist Organization: Designation of Jama'at al-Tawhid wa'al-Jihad and Aliases</i> (Oct. 15, 2004), available at https://2001-2009.state.gov/r/pa/prs/ps/2004/37130.htm . [Report cited in FR at n. 7-8, 17.]
20.	By 2005, al-Qaida in Iraq had the “immediate goal” to “expel the Coalition -- through a campaign of bombings, kidnappings, assassinations, and intimidation -- and establish an Islamic state in Iraq.”	State Dept. 2005 Country Report on Terrorism at 36. [Report cited in FR at n. 3, 10.]
21.	“AQI increased its external operations in 2005 by claiming credit for three attacks: suicide bomber attacks against hotels in Amman on November 9; a rocket attack against U.S. Navy ships in the port of Aqaba in August . . . ; and the firing of several rockets into Israel from Lebanon in December.”	State Dept. 2007 Country Report on Terrorism at 23. [Report cited in FR at n. 17.]
22.	“In an attempt to unify Sunni jihadists in Iraq, in January 2006, al-Qaida in Iraq (AQI) created the Mujahidin Shura Council, an umbrella organization meant to encompass the various Sunni jihadist groups in Iraq. AQI claimed its attacks under the MSC until mid-October, when Abu Musab al-Zarqawi’s successor, Abu Ayyub al Masri, took the first step toward al-Qaida’s goal of establishing a caliphate in the region by declaring the ‘Islamic State of Iraq’ (ISI), under which AQI now claims its attacks.”	State Dept. 2007 Country Report on Terrorism at 23. [Report cited in FR at n. 17.]
23.	After al-Zarqawi was killed in a U.S. airstrike on June 7, 2006, Zarqawi’s successor, Abu Ayyub al-Masri, “issued a statement pledging to continue what Zarqawi had started, and AQI has continued its strategy of targeting Coalition Forces and Shi’a civilians in an attempt to foment sectarian strife.”	State Dept. 2007 Country Report on Terrorism at 23; <i>see also</i> United Nations Security Council, <i>Security Council Committee Pursuant to Resolutions 1267 (1999) 1989 (2011) and 2253 (2015) Concerning ISIL (Da’esh) Al-Qaida and Associated Individuals Groups Undertakings and Entities</i> (Jan. 18, 2018), at 2 (identifying Zarqawi’s death in June 2006), available at

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		https://www.un.org/sc/suborg/en/sanctions/1267/aq_sanctions_list/summaries/entity/al-qaida-in-iraq ; <i>see also</i> ECF No. 49, at ¶4. [Report cited in FR at n. 9, 17.]
24.	In October 2006, AQI publicly re-named itself the Islamic State of Iraq.	State Dept. 2013 Country Report on Terrorism, at 22. [Report cited in FR at n. 14.]
25.	Al-Qaida in Iraq carried out several major international attacks in Iraq that were aimed at the U.S. and Coalition forces, including, but not limited to, an August 2003 bombing of the Jordanian Embassy in Baghdad, a vehicle-borne improvised explosive device attack against the UN headquarters in Baghdad, and suicide attacks inside the Green Zone perimeter in Baghdad.	State Dept. 2007 Country Report on Terrorism at 23; U.S. Department of Treasury, <i>Treasury Designates Six Al-Qaida Terrorists</i> (Sept. 24, 2003), at 2, available at https://www.treasury.gov/press-center/press-releases/Pages/js757.aspx . [Report cited in FR at n. 6 and 17.]
26.	“As AQI, ISIS conducted numerous high profile attacks, including improvised explosive device attacks against U.S. military personnel and Iraqi infrastructure, videotaped beheadings of U.S. citizens, suicide bombings against both military and civilian targets, and rocket attacks.”	State Dept. 2016 Country Report on Terrorism, at 28. [Report cited in FR at n. 20, 24.]
27.	By April 2007, U.S. Department of State identified that “[a]lthough Coalition and Iraqi security force operations also have cost AQI dozens of lieutenants and high-ranking network members, overall violence in Iraq is at a higher level than it was while Zarqawi was alive.”	State Dept. 2007 Country Report on Terrorism 23. [Report cited in FR at n. 17.]
28.	AQI was responsible for the simultaneous attacks in July on prisons at al-Taji and Abu Ghraib[, near Baghdad,] that killed approximately 29 and freed hundreds of prisoners; a wave of bombings in Baghdad in August that killed approximately 52; and the September bombing of the Kurdistan Democratic Party’s Directorate of Security headquarters in Irbil[, Iraq] that killed six. On October 6, in Ninewa Province[, Iraq,] two Vehicle Borne Improvised Explosive Devices (VBIEDs) were	State Dept. 2013 Country Report on Terrorism, at 22; <i>see also</i> United States State Dept. 2005 Country Report on Terrorism at 23. [Report cited in FR at n. 3, 10, 14.]

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	detonated in the al-Aiyathiya neighborhood. The first VBIED was detonated near an elementary school and the second one targeted an Iraqi Police checkpoint. The attacks [injured many and] killed up to 13 school children and one Iraqi police officer.” “On October 17, near the end of Eid al-Adaha holiday, a suicide bomber detonated a VBIED in a Shabak minority neighborhood in eastern Mosul[, Iraq,] killing 15 ... and wounding more than 50 others. On December 23, five people were killed in a suicide bombing after armed AQI militants stormed a television complex in the city of Tikrit[, Iraq.]”	
29.	Abu Bakr al-Baghdadi (a.k.a. Ibrahim Awwad Ibrahim Ali al-Badri, a.k.a. Abu Du’a) “is in charge of running AQI operations currently based in Iraq and is responsible for managing and directing large scale [terrorist] operations, such as the August 28, 2011 attack on the Umm al-Qura mosque in Baghdad, which killed prominent Sunni lawmaker Khalid al-Fahdawi.”	United States Department of State, <i>Terrorist Designation of Ibrahim Awwad Ibrahim Ali al-Badri</i> (Oct. 4, 2011), available at https://2009-2017.state.gov/r/pa/prs/ps/2011/10/174971.htm ; see also State Dept. 2016 Country Report on Terrorism, at 27. [Report cited in FR at n. 24.]
30.	“In a statement eulogizing Usama Bin Laden, Abu Du’a threatened violent retaliation for bin Laden’s death.”	United States Department of State, <i>Terrorist Designation of Ibrahim Awwad Ibrahim Ali al-Badri</i> (Oct. 4, 2011), available at https://2009-2017.state.gov/r/pa/prs/ps/2011/10/174971.htm . [Report cited in FR at n. 19.]
31.	“Three days after bin Laden’s death, Abu Du’a claimed responsibility for an attack in Hilla, Iraq, that killed 24 policemen and wounded 72 others. The group claimed 23 other attacks south of Baghdad between March and April 2011; all of these attacks have been carried out under Abu Du’a’s guidance.”	United States Department of State, <i>Terrorist Designation of Ibrahim Awwad Ibrahim Ali al-Badri</i> (Oct. 4, 2011), available at https://2009-2017.state.gov/r/pa/prs/ps/2011/10/174971.htm . [Report cited in FR at n. 19.]

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32.	“On August 15, 2011, a wave of AQI suicide attacks began in Mosul, Iraq, which has resulted in over 70 deaths. Shortly thereafter, AQI, under Abu Du’a’s direction, pledged on its website to carry out 100 attacks across Iraq in retaliation for bin Laden’s death. The statement claimed the campaign would include varied attacks, including raids, suicide attacks, roadside bombs and small arms attacks in all cities and rural areas across Iraq.”	United States Department of State, <i>Terrorist Designation of Ibrahim Anwad Ibrahim Ali al-Badri</i> (Oct. 4, 2011), available at https://2009-2017.state.gov/r/pa/prs/ps/2011/10/174971.htm . [Report cited in FR at n. 19.]
33.	In 2013, led by Abu Bakr al-Baghdadi (a.k.a. Abu Du’a), the group changed its name to the Islamic State in Iraq and al-Sham (ISIS, also referred to as ISIL).	ECF No. 49, at ¶ 5; <i>see also</i> State Dept. 2013 Country Report on Terrorism, at 22. [Report cited in FR at n. 14.]
34.	Since 2013, ISIL “has continued to plot and execute attacks against U.S. persons and interests in Iraq, Syria, and the region. ISIL is directly responsible for the murder and beheading of at least four kidnapped American citizens in Syria and multiple fatal attacks against U.S. military personnel who were present in Syria and in Iraq (at the invitation of the Iraqi Government).”	ECF No. 49, at ¶ 5.
35.	When ISIL took Fallujah and Ramadi they did so with “convoys of up to 100 trucks with mounted heavy machine guns and anti-aircraft guns flying the black flag of al-Qaeda.”	Brett McGurk Testimony, United States Cong. House Comm. On Foreign Affairs, <i>Hearing on Al-Qaeda’s Resurgence in Iraq: A threat to U.S. Interests</i> , p. 7 (February 5, 2014). 113 th Cong., 2 nd Sess. Washington: GOP, 2014 (testimony of Brett McGurk, Deputy Assistant Secretary for Iraq and Iran, Bureau of Near Eastern Affairs, U.S. Department of State) (hereinafter “McGurk Testimony”), available at https://www.gpo.gov/fdsys/pkg/CHRG-113hhrg86588/pdf/CHRG-113hhrg86588.pdf . [McGurk Testimony cited in FR at n. 22-23.]

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36.	In January 2014, “ISIL fighters captured a group of Iraqi soldiers, paraded them around the city flying al-Qaeda’s black flag and then executed them.”	McGurk Testimony, at 8. [McGurk Testimony cited in FR at n. 22-23.]
37.	“In a rare audio statement, on January 21 st [2014] ISIL’s leader directed his fighters “to be on the front lines against the Shi’a and march toward Baghdad.” This audio statement also had “a direct message to the Americans: Soon we will be in direct confrontation so watch for us for we are with you watching.”	McGurk Testimony, at 8. [McGurk Testimony cited in FR at n. 22-23.]
38.	“ISIL basically is al-Qaeda in Iraq. Its leader was the al-Qaeda in Iraq leader since 2010.”	McGurk Testimony, at 6. [McGurk Testimony cited in FR at n. 22-23.]
39.	On May 14, 2014, the U.S. Government amended its designation of al-Qaida in Iraq to identify the Islamic State of Iraq and the Levant (“ISIL”) as the organization’s primary name.	United States Department of State, <i>Terrorist Designations of Groups Operating in Syria</i> (May 14, 2014), available at https://2009-2017.state.gov/r/pa/prs/ps/2014/05/226067.htm .
40.	“In June 2014, ISIS leader al-Baghdadi declared an Islamic caliphate.”	State Dept. 2016 Country Report on Terrorism, at 27. [Report cited in FR at n. 20, 24.]
41.	“ISIL split from al-Qa’ida in 2014. This rift was prompted by theological and strategic disagreements and included claims from ISIL that it is the true executor of bin Laden’s legacy, rather than al-Qa’ida’s current leadership.”	ECF No. 49, at ¶ 6.
42.	Since the 2014 announced split, “[s]ome members and factions of al-Qa’ida-aligned groups . . . publicly declared allegiance to ISIL.”	ECF No. 49, at ¶ 6.
43.	“ISIL continues to denounce the United States as its enemy and to target U.S. citizens and interests worldwide.”	ECF No. 49, at ¶ 6.
44.	“In November 2015, ISIS carried out a series of coordinated attacks in Paris, France, including at a rock concert at the Bataclan concert hall, killing approximately 130 people and	State Dept. 2016 Country Report on Terrorism, at 29. [Report cited in FR at n. 20, 24.]

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	injuring more than 350 others; 23-year-old U.S. citizen Nohemi Gonzalez was among the dead.”	
45.	“In March [2016], ISIS carried out a suicide attack at a crowded park in Iskandariya, Iraq at the end of a football match, killing approximately 29 and wounding more than 60 others.”	State Dept. 2016 Country Report on Terrorism, at 28. [Report cited in FR at n. 20, 24.]
46.	“Also in March [2016], at least 60 people were killed in an attack claimed by ISIS in Hilla, Iraq when an explosives-laden fuel tanker ran into an Iraqi security checkpoint.”	State Dept. 2016 Country Report on Terrorism, at 28. [Report cited in FR at n. 20, 24.]
47.	“In early May 2016, two suicide car bombs claimed by ISIS killed 32 and wounded another 75 in Samawa, in southern Iraq. In mid-May, ISIS conducted a series of attacks in and around Baghdad, including suicide bombings and a car bombing at a crowded market in Sadr City that killed at least 88 people”	State Dept. 2016 Country Report on Terrorism, at 28. [Report cited in FR at n. 20, 24.]
48.	“In July [2016], ISIS claimed a car bombing at a popular shopping center in Baghdad that killed nearly 300 people, making it the single deadliest bombing in Iraq’s capital city since 2003.”	State Dept. 2016 Country Report on Terrorism, at 28. [Report cited in FR at n. 20, 24.]
49.	“In October, it was revealed that ISIS was using hundreds to thousands of Iraqi civilians as human shields. The group reportedly rounded up and massacred 284 men and boys before dumping their bodies in a mass grave in northern Mosul, Iraq.”	State Dept. 2016 Country Report on Terrorism, at 28. [Report cited in FR at n. 20, 24.]
50.	“In Iraq and Syria, ISIS’s use of military equipment captured in the course of fighting gave the group greater capabilities in line with a more conventional military force, including the reported use of eastern bloc tanks, artillery, and self-developed unmanned aerial drones.”	State Dept. 2016 Country Report on Terrorism, at 28. [Report cited in FR at n. 20, 24.]

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51.	“ISIS also directs, enables, and inspires individuals to conduct attacks and act on behalf of the group around the world, including in the United States and Europe.”	State Dept. 2016 Country Report on Terrorism, at 29. [Report cited in FR at n. 20, 24.]
52.	“In March 2016, ISIS directed two simultaneous attacks in Brussels, Belgium – one at the Zaventem Airport and the other at a metro station. The attacks killed 32 people, including four U.S. citizens, and injured more than 250 people.”	State Dept. 2016 Country Report on Terrorism, at 29. [Report cited in FR at n. 20, 24.]
53.	“In June 2016, a gunman who pledged allegiance to ISIS killed 49 individuals and injured 53 others at the Pulse nightclub in Orlando, Florida.”	State Dept. 2016 Country Report on Terrorism, at 29. [Report cited in FR at n. 20, 24.]
54.	“In July 2016, ISIS claimed an attack in which a cargo truck drove into a crowd in Nice, France, during Bastille Day celebrations, resulting in 86 deaths, including three U.S. citizens.”	State Dept. 2016 Country Report on Terrorism, at 29. [Report cited in FR at n. 20, 24.]
55.	“In December 2016, ISIS claimed responsibility for a truck attack on a crowded Christmas market in Berlin, Germany that killed 12 people and injured 48 others.”	State Dept. 2016 Country Report on Terrorism, at 29. [Report cited in FR at n. 20, 24.]
56.	In a September 2017 statement, ISIL emir Abu Bakr al-Baghdadi highlighted the group’s continued intent on attacking the United States and its interests worldwide by specifically calling for attacks against the United States.”	ECF No. 49, at ¶ 6.
57.	ISIL occupied major cities in Iraq until driven out in 2017.	United Nations Sec. Council, <i>Sec. Council Comm. Pursuant to Resolutions 1267 (1999), 1989 (2011) and 2253 (2015) Concerning Islamic State in Iraq and the Levant (Da’esh), Al-Qaida and Associated Individuals, Groups, Undertakings, and Entities</i> , Twenty-first Report of the Analytical Support and Sanctions Monitoring Team, at 5, S/2018/14, (January 26, 2018) (“2018 UN Monitoring Report”), available at http://www.un.org/en/ga/documents/symbol.shtml

No.	Fact	Cite
		(cited in Respondent's Response in Support of Factual Return); <i>see also</i> McGurk Testimony, at 6. [McGurk Testimony cited in FR at 20, 24.]
58.	Recent U.N. reports note the possibility of "potential convergence" in some regions because "some members of both organizations have been willing and able to support each other in the preparation of [terrorist] attacks."	2018 UN Monitoring Report at 4; <i>see also</i> United Nations Sec. Council, <i>Sec. Council Comm. Pursuant to Resolutions 1267 (1999), 1989 (2011) and 2253 (2015) Concerning Islamic State in Iraq and the Levant (Da'esh), Al-Qaida and Associated Individuals, Groups, Undertakings, and Entities</i> , Eighteenth Report of the Analytical Support and Sanctions Monitoring Team, at 5, S/2016/629 (July 19, 2016), available at http://www.un.org/en/ga/documents/symbol.shtml (cited in Respondent's Response in Support of Factual Return).