

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF VIRGINIA BEACH

COUNCIL ON AMERICAN-ISLAMIC
RELATIONS, INC.
Plaintiff/Counterclaim Defendant,

v.

ANDREW WHITEHEAD
Defendant/Counterclaim Plaintiff.

Law No. CL 04-926

DEFENDANT'S FIRST REQUEST FOR ADMISSIONS TO PLAINTIFF

Pursuant to Rule 4:11 of the Rules of the Supreme Court of Virginia, Defendant, Andrew Whitehead, hereby submits these requests for admission to Plaintiff Council on American-Islamic Relations, Inc. ("CAIR").

DEFINITIONS

1. "Ahmad" means the person sometimes known as "Omar Ahmad" or "Omar Yehya" or "Omar Yehya Ahmad" and who is sometimes identified as the "chairman of the board" of CAIR.
2. "Awad" means the person sometimes known as "Nihad Awad," "Nihad Hammad," or "Abu Haitham" and who is sometimes identified as the "executive director" of CAIR.
3. "CAIR" means (a) the plaintiff in this action, its past and present officers, directors, (including, but not limited to, Ahmad, Awad, Hooper as defined below, and Jaber, as defined below), advisory board members, agents, attorneys, and representatives, and (b) each and every "chapter" listed at www.cair-net.org/default.asp?Page=chapters (Appendix

EXHIBIT

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A), and each and every past and present officer, director, advisory board member, agent, attorney, and representative thereof.

4. “Communication” means (a) a conversation, letter, note, document (as defined below), memorandum, telephone call, email, facsimile, recording, video, or any other method of relaying or communicating information, and/or (b) any one of definitions 1-7 given in The American Heritage Dictionary, p.290 (4th Ed. 2002)(Appendix B).

5. “Copy” has the meaning given in Black ’s Law Dictionary, p. 360 (8th Ed. 2004)(Appendix C).

6. “Document” or “documents” means all items within the scope of Rule 4:9 of the Rules of the Supreme Court of Virginia.

7. “Donation or contribution” means the donation or contribution of any (a) cash, checks, funds, wire transfers, or monies of any kind or nature; (b) goods or services of any type, including, but not limited to, computer, internet, banking, fund-raising, publishing, or public relations services, whether direct, indirect, or in-kind; (c) extensions of credit on anything other than a fair commercial market basis; and (d) any property, whether real or personal (including use or access thereto), whether direct, indirect, or in-kind, and including, but not limited to, use of or access to office space, computer services, or otherwise, on anything other than a fair commercial market basis.

8. “Elashi” or “Ghassen Elashi” means the person identified in paragraph 13 of the Indictment filed on July 26, 2004 in *United States v. Holy Land Foundation, et al* (Exhibit 1) and in paragraph 3 of the Superseding Indictment filed on December 17, 2002, in *United States v. Elashi, et al.* (U.S.D.C. ND Tx) (Exhibit 2).

9. "FBI Memorandum" means, the Memorandum from Dale L. Watson dated November 5, 2001 (Exhibit 3).

10. "Foreign Terrorist Organization" or "FTO" means any foreign organization designated by the Secretary of State in accordance with Section 219 of the Immigration and Nationality Act, as amended ("INA") (Exhibit 4).

11. "Global Relief Foundation, Inc." or "GRF" a/k/a "Fondation Secours Mondial", means the organization of the same name identified in United States Department of the Treasury Announcement 2003-74 titled "Suspension of Tax Exempt Status of Organizations Identified with Terrorism," its officers, directors, employees, managers, and representatives.

12. "Holy Land Foundation for Relief and Development" or "HLF" means the organization of the same name identified in Exhibit 1 and/or United States Department of the Treasury Announcement 2003-74 titled "Suspension of Tax Exempt Status of Organizations Identified with Terrorism," its officers, directors, employees, managers, representatives, and predecessors, including, but not limited to, the organization known as the "Occupied Land Fund."

13. "Hooper" means Doug or Douglas aka "Ibrahim" Hooper, the person sometimes identified as National Communications Director of CAIR.

14. "Identified Terrorist" means any person identified under Executive Order 13224, effective September 24, 2001, including those listed in the U.S. Department of The Treasury Office of Foreign Assets Control publication titled "Terrorism: What You Need To Know About U.S. Sanctions" ("Terrorist List") (Exhibit 5).

15. "Infocom" means the corporation identified in paragraph 1 of Exhibit 2.

16. "Jaber" means the person sometimes known as "Rafeeq Jaber."
17. "Major Donor or Contributor" means any person who has made a donation or contribution valued in excess of \$1,000.00.
18. "Marzook" means the person identified in paragraph 1 of the Second Superseding Indictment in *United States v. Marzook, et al*, Case No. 03 CR 978 (U.S.D.C. ND II) (Exhibit 6).
19. "Named Persons" means (a) any FTO, (b) any Identified Terrorist, (c) any person known to you to either, now or in the past "engage in Terrorist Activity," (d) the (i) Islamic Charity Society of Hebron, (ii) Dar El-Salam Hospital, (iii) Islamic Science and Culture Committee, (iv) Ramallah Charitable Committee; a/k/a Committee of Charity and Religious Alms in Ramallah a/k/a/ Charity Committee of Ramallah a/k/a Ramallah Zakat Committee, (v) Nablus Charitable Committee a/k/a Nablus Zakat Committee, (vi) Qalgilia Zakat Committee, (vii) Jenin Charitable Committee a/k/a Jenin Zakat Committee, (viii) Tulkarem Zakat Committee a/k/a Tulkarem Charitable Committee a/k/a Committee of Charity and Religious Alms in Tulkarem (ix) Al-Ansar Charity, (x) the Islamic Association (Gaza) a/k/a Al Jamaya Al-Islamiya, (xi) al-Mujama al-Islami, (xii) Islamic Charitable Society Al-Bireh, (xiii) al-Islah Charitable Society, (xiv) the Association de Secours Palestinien (ASP)(Basel, Switzerland), (xv) Commite de Bienfaisance et de Secours aux Palestiniens (CBSP), (xvi) Palestinian Association in Austria, (xvii) Interpal (London), (xviii) Al-Ihsan Charitable Society, (xviii) Dar al-Huda Society, and (xx) Islamic An-Naqqa Society for Women, Bethlehem, (e) the Islamic Association for Palestine, and its corporate predecessors and affiliates ("IAP"), (f) the Muslim Brotherhood, and its corporate

predecessors, successors, and affiliates, (g) any person specifically identified in any of the following:

- Exhibits 1 - 6.
- Declaration in Support of Pre-Trial Detention by David Kane, *United States v. Biheiri*, Case No. 03-365-A (U.S.D.C. ED Va.) (Exhibit 7).
- Affidavit in Support of Criminal Complaint by Brett Gentrup, *United States v. Alamoudi*, (U.S.D.C. ED Va.) (Exhibit 8).
- Supplemental Declaration in Support of Detention by Brett Gentrup, *United States v. Alamoudi*, Appeal from Case No. 03-1009M (U.S.D.C. ED Va.) (Exhibit 9).
- Indictment filed in *United States v. Sami Al-Arian, et al*, (U.S.D.C. MD Fl.) (Exhibit 10).
- Memorandum Opinion, *Holy Land Foundation v. Ashcroft*, CA 02-442 (GK) (U.S.D.C. D DC) (Exhibit 11).
- Third Amended Complaint, *Burnett et al. v. Al-Baraka Investment and Development Corporation, et al.*, Case Number 1:02CV01616 (JR) (U.S.D.C. D DC) (Exhibit 12).
- Special April 2002 Grand Jury Charge, *United States v. Arnaout*, No. 02 CR 892 (U.S.D.C. ED IL) (Exhibit 13).
- Affidavit of Robert Walker, *United States v. Benevolence International Foundation, Inc. et al.*, 02 CR 0414 (U.S.D.C. ED IL) (Exhibit 14).

20. "Opinion" has the meaning given in *Chaves v. Johnson*, 230 Va. 112 (1985) and *Williams v. Garrahty*, 249 Va. 224 (1995).

21. "Person" or "persons" means natural persons, individuals, private or public associations, non-profit corporations, corporations, foundations, banks, investment organizations, companies, partnerships, joint ventures, trusts, estates, agencies, non-governmental organizations, or government entities, foreign or domestic, as appropriate.

22. "Person associated with" a natural person means any past or present: (a) spouse, (b) children, (c) siblings, (d) aunts and uncles, (e) grandparents, (f) first and second cousins, (g) in-laws, including former in-laws, to the level of first cousin.

23. "Person associated with" any person other than a natural person means any past or present (a) officer, (b) director, (c) salaried employee, (d) subsidiary, (e) related company, investment organization, trust, or foundation, (f) contractor for more than two consecutive months, (g) advisory board member, (h) partner, (i) co-venturer, (j) lender, or (k) legal person with one or more common directors, officers, or employees.

24. "Public figure" and "limited public figure" have the meaning given in *Gertz v. Robert Welch, Inc.*, 418 U.S. 323 (1974).

25. "Public concern" has the meaning given in *James v. Haymes*, 163 Va. 873 (1935).

26. "Relating to" means concerning, containing, alluding to, responding to, connected with, regarding, discussing, involving, showing, describing, analyzing, reflecting, identifying, incorporating, referring to, or in any way pertaining to.

27. "Request," and "requested" as used in connection with "donations or contributions" shall have the meaning given in The American Heritage College Dictionary, p.1183 (4th Ed.)(2002) (Appendix D), and shall include any type or form of solicitation, suggestion, encouragement, or request for donations or contributions, whether made in person, by mail, by facsimile, by wire, by phone, by email (including, but not limited to, CAIR-NET), by website links, or otherwise.

28. "Saudi Funding Sources" means any or all of the following: (a) the government of the Kingdom of Saudi Arabia ("KSA"), (b) the Islamic Development Bank

("IDB"), (c) the World Association of Muslim Youth ("WAMY"), (d) the Muslim World League ("MWL"), (e) the International Islamic Relief Organization ("IIRO"), (f) the al-Haramain Islamic Foundation ("Haramain"), (g) al-Walid Bin Talal ("Talal"), (h) the International Islamic Federation of Students Organizations ("IIFSO"), (i) the Sanabel al-Kheer ("Sanabel"), (j) members of the Saudi Arabian Royal Family ("SARF"), (k) Benevolence International Foundation, Inc. ("BIF"), (l) Lajnat al-Birr al-Islamiah ("LBI"), (m) World Islam Studies Enterprise ("WISE"), (n) American Muslim Council ("AMC"), (o) International Institute of Islamic Thought ("IIIT"), (p) Mercy International – USA ("MIUSA"), (q) Islamic Council of North America ("ICNA"), (r) any other non-governmental organization with an office in Saudi Arabia ("Saudi NGOs"), (s) persons associated with any of the persons identified in sections (a) – (r) of this paragraph.

29. "Saudi Government" means any official, employee, representative, agent, ambassador, consulate officer of, or person associated with, the KSA, the Islamic Affairs Department of the Saudi Embassy ("IAD") and/or SARF.

30. "Support" has the meaning given: (a) by Awad at Barry University on March 22, 1994, when he stated "I am in support of the Hamas movement," and/or (b) in definitions 5, 6, 7a and 7b, 9, and all synonyms listed underneath thereto in The American Heritage College Dictionary, p.1387 (4th Ed.)(2002) (Appendix E).

31. "Suspect Territory" ("Suspect Territories" in the plural) means any or all of the following countries and/or territories: (a) Saudi Arabia, (b) Qatar, (c) Jordan, (d) Afghanistan, (e) Chechnya, (f) United Arab Emirates, (g) Iraq, (h) Lebanon, (i) Iran, (j) Egypt, (k) Libya, (l) the territories commonly called the West Bank and Gaza, (m) Sudan, (n) Yemen, (o) France, (p) Germany, (q) Italy, (r) the United Kingdom, and (s) Morocco.

32. "Terrorism" has the meaning given at §140(d)(2) of the Foreign Relations Authorization Act, FY 1988 and 1989.

33. "Terrorist Activity" and "Engage in Terrorist Activity" have the meaning given at INA §212(a)(3)(B).

34. "United States Government" shall mean: (a) any agency, bureau, or representative of the United States, including, but not limited to, the Federal Bureau of Investigation, the Immigration and Naturalization Service, the Department of State, the Department of Homeland Security, the Department of the Treasury, and the Internal Revenue Service; (b) any federal official, whether appointed or elected, including United States Senators and Representatives and their staff members; (c) any federal or local law enforcement agency, including police, customs, and other similar agencies, local prosecutors, and United States Attorneys.

35. "You", "your" or "yourself" means CAIR.

GENERAL INSTRUCTIONS

A. This case involves persons who have or use Arabic names. Arabic names and words may be transliterated into English in a number of ways. It is a violation of law to refuse or fail to answer any of the following Requests on the grounds that a "correct" English transliteration is not used. So long as you are able to reasonably ascertain the identity of the person in question, you must either admit or deny in accordance with Rule 4.11(a).

B. The word "and" includes the word "or," and vice versa, as appropriate based on a fair reading of the Request.

C. The use of the singular includes the plural, the masculine includes the feminine, and vice versa, as appropriate based on a fair reading of the Request.

REQUESTS

1. Admit Exhibit 1 is a complete and/or true Copy.

Answer:

2. Admit Exhibit 2 is a complete and/or true Copy.

Answer:

3. Admit Exhibit 3 is a complete and/or true Copy.

Answer:

4. Admit Exhibit 4 is a complete and/or true Copy.

Answer:

5. Admit Exhibit 5 is a complete and/or true Copy.

Answer:

6. Admit Exhibit 6 is a complete and/or true Copy.

Answer:

7. Admit Exhibit 7 is a complete and/or true Copy.

Answer:

8. Admit Exhibit 8 is a complete and/or true Copy.

Answer:

9. Admit Exhibit 9 is a complete and/or true Copy.

Answer:

10. Admit Exhibit 10 is a complete and/or true Copy.

Answer:

11. Admit Exhibit 11 is a complete and/or true Copy.

Answer:

12. Admit Exhibit 12 is a complete and/or true Copy.

Answer:

13. Admit Exhibit 13 is a complete and/or true Copy.

Answer:

14. Admit Exhibit 14 is a complete and/or true Copy.

Answer:

15. Admit Exhibit 15 is a complete and/or true Copy of text posted at www.cair-net.org/default.asp?Page=formcairchapter on or about 1/5/2005.

Answer:

16. Admit Exhibit 16 is a complete and/or true Copy of text posted at www.cair-austin.org/files/constitution.htm on or about 12/18/2004.

Answer:

17. Admit Exhibit 17 is a complete and/or true Copy of text posted on “CAIR-Seattle” website on or about 12/28/2004.

Answer:

18. Admit Exhibit 18 is a complete and/or true Copy of text posted at www.cairhouston.org/about.htm on or about 12/28/2004.

Answer:

19. Admit Exhibit 19 is a complete and/or true Copy of text posted at www.cair-ohio.com/about.htm on or about 12/28/2004.

Answer:

20. Admit Exhibit 20 is a complete and/or true Copy of text posted on CAIR-New Jersey’s website at www.cair-nj.org/about.htm on or about 12/28/2004.

Answer:

21. Admit Exhibit 21 is a complete and/or true Copy of text posted on the CAIR-CT website at www.cair-ct.com/links/preseereleases.asp?newsid=62 on or about 12/28/2004.

Answer:

22. Admit Exhibit 22 is a complete and/or true Copy of text posted at www.ain-al-yaqeen.com/issues/20020712/feat10en.htm.

Answer:

23. Admit Exhibit 23 is a complete Copy of an article published in the Washington Post dated October 31, 1998, titled "FBI Terror Probe Focuses on U.S. Muslims."

Answer:

24. Admit Exhibit 24 is complete and/or true Copy of a substantially accurate English translation of the Hamas charter (the "Hamas Charter").

Answer

25. Admit Exhibit 25 is a complete and/or true Copy of an article in the San Ramon Valley Herald dated July 4, 1998 (underlining excepted).

Answer:

26. Admit Exhibit 26 is a complete and/or true Copy of the CAIR website homepage on or between September 17, 2001.

Answer:

27. Admit Exhibit 27 is a complete and/or true Copy of the CAIR website homepage on or about September 25, 2001.

Answer:

28. Admit Exhibit 28 is a complete and/or true Copy of the memorandum opinion and order issued in *Boim, et al., v. Quranic Literacy Institute, et al*, Case No. 00 C 2905 (N.D. Ill. 2004), docketed November 10, 2004.

Answer:

29. Admit Exhibit 29 is a complete and/or true Copy of the Report Submitted by Majority Staff of the United States Senate, Committee on the Judiciary, Subcommittee on Terrorism, Technology and Homeland Security, 1st Session, 108th Congress (March 2004).

Answer:

30. Admit Exhibit 30 is a complete and/or true Copy or an article titled: "Muslim group sponsors controversial speaker; Jews control U.S. policy, Awad says" by Shaun Tandon in The Georgetown Voice, February 26, 1998.

Answer:

31. Admit Exhibit 31 is a complete and/or true Copy of the article titled: "Calls for "oceans of blood" came during Kansas Muslim convention" by Rich Montgomery, Knight Ridder Newspapers, February 2, 2002.

Answer:

32. Admit Exhibit 32 is a complete and/or true Copy of the "Affidavit in Support of Arrest Warrant" in the case of *United States v. Mohammed Ali Hasan Al-Moayad*.

Answer:

33. Admit Exhibit 33 is a complete and/or true Copy of an article in the Los Angeles Times dated November 4, 2001 by Lisa Getter, et al, titled "Islamic American Nonprofits Face Increased Scrutiny in U.S."

Answer:

34. Admit Exhibit 34 is a complete and/or true Copy of the definition of "jihad" found at www.islamicity.com/dialogue/Q308.HTM.

Answer:

35. Admit Exhibit 35 is a complete and/or true Copy of the U.S. Department of State "Fact Sheet" regarding Executive Order 13224.

Answer:

36. Admit Exhibit 36 is a complete and/or true Copy of an article in the Wall Street Journal by Glenn R. Simpson titled: "U.S. Tries to Tie Maze of Firms, Charities, Based in Herndon Into a Global Network; Bin Laden's 'Golden Chain'" and dated June 21, 2004.

Answer:

37. Admit Exhibit 37 is a complete and/or true Copy of text posted on the IAP website at www.iap.org/islamiccause.htm.

Answer:

38. Admit Exhibit 38 is a complete and/or true Copy of an article published in the Daily Gopher titled "Arab-Israeli talks spark dialogue" by Kiyosha Takenaka dated 11/08/1993.

Answer:

39. Admit Exhibit 39 is a complete and/or true Copy of the deposition of Ahmad in *Boim v. Quaranic Literacy Institute, et al.*

Answer:

40. Admit Exhibit 40 is a complete and/or true Copy of the deposition of Awad in *Boim v. Quaranic Literacy Institute, et al.*

Answer:

41. Admit Exhibit 41 is a complete and/or true Copy of the deposition of Jaber in *Boim v. Quaranic Literacy Institute, et al.*

Answer:

42. Admit Exhibit 42 is a complete and/or true Copy of an article published in the Salt Lake Tribune, Monday, September 2, 2002, with the byline of Matt Canham.

Answer:

43. Admit Exhibit 43 is a complete and/or true Copy of text posted at www.islamicsupremecouncil.org and titled "WAMY Supports CAIR Campaign Against US Anti-Islamic Sentiment."

Answer:

44. Admit CAIR was formed in or about 1994 by, among others, Ahmad, Awad, and Jaber.

Answer:

45. Admit Ahmad is or was a person associated with IAP.

Answer:

46. Admit Awad is or was a person associated with IAP.

Answer:

47. Admit IAP supported the destruction of the State of Israel, and/or its replacement with an Islamic state, while Ahmad was a person associated with IAP.

Answer:

48. Admit IAP supported the destruction of the State of Israel, and/or its replacement with an Islamic state, while Awad was a person associated with IAP.

Answer:

49. Admit Exhibit 37 states, in part:

[T]he real nature of the conflict is a civilizational conflict waged between, on the one hand (sic) Islamic Civilization with its divinely inspired laws and mission to create on this earth the society of justice and freedom which has been ordained by God; and on the other hand, Western Civilization with its materialistic culture, worship of ethnicity and the state, and denial of God's supremacy. The existence of a Jewish state in the heart of the Muslim World and the occupation of Masjid Al-Aqsa is symbolic of the weakness of the Muslim Ummah and Muslims' own straying from the path of Islam in embracing imported ideologies. Masjid Al-Aqsa, Baitul-Maqdis, and the Blessed Lands of Palestine do not belong to the Palestinians or Arabs alone but to all Muslims, and only when the Muslim's (sic) return to their faith and see the conflict in its real terms can they liberate Palestine as was done in the 12th Century by Salah al-Din Al-Ayyubi who, while not an Arab, knew his Islamic responsibility in undertaking the civilization struggle against the West....

Answer:

50. Admit Ahmad agrees with the statement quoted in Request 49.

Answer:

51. Admit Awad agrees with the statement quoted in Request 49.

Answer:

52. Admit Hooper agrees with the statement quoted in Request 49.

Answer:

53. Admit Marzook was a person associated with IAP while Awad was a person associated with IAP.

Answer:

54. Admit Marzook was a person associated with IAP while Ahmad was a person associated with IAP.

Answer:

55. Admit Marzook, at the time he was a person associated with IAP, was a person associated with the "Harakat al-Muqawamah al-Islamiyyah," or "Hammas."

Answer:

56. Admit Marzook, at the time he was a person associated with IAP, was a person associated with an organization commonly known as the "Muslim Brotherhood."

Answer:

57. Admit Hamas is responsible for the murder of innocent civilians.

Answer:

58. Admit Hamas is an FTO.

Answer:

59. Admit Article Seven of the Hamas Charter states in part:

[T]he Hamas has been looking forward to implement Allah's promise whatever time it might take. The prophet, prayer and peace be upon him, said: The time will not come until Muslims will fight the Jews (and kill them); until the Jews hide behind rocks and trees, which will cry: O Muslim! there is a Jew hiding behind me, come on and kill him!

Answer:

60. Admit Awad believes:

The prophet, prayer and peace be upon him, said: The time will not come until Muslims will fight the Jews (and kill them); until the Jews hide behind rocks and trees, which will cry: O Muslim! there is a Jew hiding behind me, come on and kill him!

Answer:

61. Admit Ahmad believes:

The prophet, prayer and peace be upon him, said: The time will not come until Muslims will fight the Jews (and kill them); until the Jews hide behind rocks and trees, which will cry: O Muslim! there is a Jew hiding behind me, come on and kill him!

Answer:

62. Admit Hooper believes:

The prophet, prayer and peace be upon him, said: The time will not come until Muslims will fight the Jews (and kill them); until the Jews hide behind rocks and trees, which will cry: O Muslim! there is a Jew hiding behind me, come on and kill him!

Answer:

63. Admit Jaber believes:

The prophet, prayer and peace be upon him, said: The time will not come until Muslims will fight the Jews (and kill them); until the Jews hide behind rocks and trees, which will cry: O Muslim! there is a Jew hiding behind me, come on and kill him!

Answer:

64. Admit each current CAIR officer or director believes:

The prophet, prayer and peace be upon him, said: The time will not come until Muslims will fight the Jews (and kill them); until the Jews hide behind rocks and trees, which will cry: O Muslim! there is a Jew hiding behind me, come on and kill him!

Answer:

65. Admit Article Fifteen of the Hamas Charter states in part:

When our enemies usurp some Islamic lands, Jihad becomes a duty binding on all Muslims. In order to face the usurpation of Palestine by the Jews, we have no escape from raising the banner of Jihad. This would require the propagation of Islamic consciousness among the masses on all local, Arab, and Islamic levels. We must spread the spirit of Jihad among the [Islamic] Umma, clash with the enemies and join the ranks of the Jihad fighters. The 'ulama as well as educators and teachers, publicity and media men as well as the masses of the educated, and especially the youth and elders of the Islamic movement, must participate in this raising of consciousness.

Answer:

66. Admit Awad agrees with the statement that: "When our enemies usurp some Islamic lands, Jihad becomes a duty binding on all Muslims."

Answer:

67. Admit Ahmad agrees with the statement that: "When our enemies usurp some Islamic lands, Jihad becomes a duty binding on all Muslims."

Answer:

68. Admit Hooper agrees with the statement that: "When our enemies usurp some Islamic lands, Jihad becomes a duty binding on all Muslims."

Answer:

69. Admit Jaber agrees with the statement that: "When our enemies usurp some Islamic lands, Jihad becomes a duty binding on all Muslims."

Answer:

70. Admit each current CAIR officer or director agrees with the statement that: "When our enemies usurp some Islamic lands, Jihad becomes a duty binding on all Muslims."

Answer:

71. Admit Awad agrees with the statement that: "In order to face the usurpation of Palestine by the Jews, we have no escape from raising the banner of Jihad. This would require the propagation of Islamic consciousness among the masses on all local, Arab, and Islamic levels. We must spread the spirit of Jihad among the [Islamic] Umma, clash with the enemies and join the ranks of the Jihad fighters."

Answer:

72. Admit Ahmad agrees with the statement that: "In order to face the usurpation of Palestine by the Jews, we have no escape from raising the banner of Jihad. This would require the propagation of Islamic consciousness among the masses on all local, Arab, and

Islamic levels. We must spread the spirit of Jihad among the [Islamic] Umma, clash with the enemies and join the ranks of the Jihad fighters.”

Answer:

73. Admit Hooper agrees with the statement that: “In order to face the usurpation of Palestine by the Jews, we have no escape from raising the banner of Jihad. This would require the propagation of Islamic consciousness among the masses on all local, Arab, and Islamic levels. We must spread the spirit of Jihad among the [Islamic] Umma, clash with the enemies and join the ranks of the Jihad fighters.”

Answer:

74. Admit Jaber agrees with the statement that: “In order to face the usurpation of Palestine by the Jews, we have no escape from raising the banner of Jihad. This would require the propagation of Islamic consciousness among the masses on all local, Arab, and Islamic levels. We must spread the spirit of Jihad among the [Islamic] Umma, clash with the enemies and join the ranks of the Jihad fighters.”

Answer:

75. Admit each current CAIR officer or director agrees with the statement that: “In order to face the usurpation of Palestine by the Jews, we have no escape from raising the banner of Jihad. This would require the propagation of Islamic consciousness among the masses on all local, Arab, and Islamic levels. We must spread the spirit of Jihad among the [Islamic] Umma, clash with the enemies and join the ranks of the Jihad fighters.”

Answer:

76. Admit Awad agrees with the statement that: “The ‘ulama as well as educators and teachers, publicity and media men as well as the masses of the educated, and especially

the youth and elders of the Islamic movement, must participate in this raising of consciousness.”

Answer:

77. Admit Ahmad agrees with the statement that: “The ‘ulama as well as educators and teachers, publicity and media men as well as the masses of the educated, and especially the youth and elders of the Islamic movement, must participate in this raising of consciousness.”

Answer:

78. Admit Hooper agrees with the statement that: “The ‘ulama as well as educators and teachers, publicity and media men as well as the masses of the educated, and especially the youth and elders of the Islamic movement, must participate in this raising of consciousness.”

Answer:

79. Admit Jaber agrees with the statement that: “The ‘ulama as well as educators and teachers, publicity and media men as well as the masses of the educated, and especially the youth and elders of the Islamic movement, must participate in this raising of consciousness.”

Answer:

80. Admit each current CAIR officer and director agrees with the statement that: “The ‘ulama as well as educators and teachers, publicity and media men as well as the masses of the educated, and especially the youth and elders of the Islamic movement, must participate in this raising of consciousness.”

Answer:

81. Admit Article Twenty-Two of the Hamas Charter states in part: "They also used the money to establish clandestine organizations which are spreading around the world, in order to destroy societies and carry out Zionist interests. Such organizations are: the Freemasons, Rotary Clubs, Lions Clubs, B'nai Brith and the like."

Answer:

82. Admit Awad believes the statement quoted in Request 81 is true.

Answer:

83. Admit Ahmad believes the statement quoted in Request 81 is true.

Answer:

84. Admit Hooper believes the statement quoted in Request 81 is true.

Answer:

85. Admit each current CAIR officer and director believes the statement quoted in Request 81 is true.

Answer:

86. Admit Article Twenty-Eight of the Hamas Charter states in part:

The Zionist invasion is a mischievous one....It relies to a great extent, for its meddling and spying activities, on the clandestine organizations which it has established, such as the Freemasons, Rotary Clubs, Lions, and other spying associations. All those secret organizations, some which are over, act for the interests of Zionism and under its directions, strive to demolish societies, to destroy values, to wreck answerableness, to totter virtues and to wipe out Islam....We cannot fail to remind every Muslim that when the Jews occupied Holy Jerusalem in 1967 and stood at the doorstep of the Blessed Aqsa Mosque they shouted with joy: "Muhammad is dead, he left daughters behind." Israel, by virtue of its being Jewish and of having a Jewish population, defies Islam and the Muslims.

Answer:

87. Admit Awad believes the "Zionist invasion" relies "to a great extent...on the clandestine organizations which it has established, such as the Freemasons, Rotary Clubs, Lions, and other spying associations."

Answer:

88. Admit Ahmad believes the "Zionist invasion" relies "to a great extent...on the clandestine organizations which it has established, such as the Freemasons, Rotary Clubs, Lions, and other spying associations."

Answer:

89. Admit Hooper believes the "Zionist invasion" relies "to a great extent...on the clandestine organizations which it has established, such as the Freemasons, Rotary Clubs, Lions, and other spying associations."

Answer:

90. Admit each current CAIR officer or director believes the "Zionist invasion" relies "to a great extent...on the clandestine organizations which it has established, such as the Freemasons, Rotary Clubs, Lions, and other spying associations."

Answer:

91. Admit Awad believes the Jews in 1967 "stood at the doorstep of the Blessed Aqsa Mosque, they shouted with joy: 'Muhammad is dead, he left daughters behind.'"

Answer:

92. Admit Ahmad believes the Jews in 1967 "stood at the doorstep of the Blessed Aqsa Mosque, they shouted with joy: 'Muhammad is dead, he left daughters behind.'"

Answer:

93. Admit Hooper believes the Jews in 1967 “stood at the doorstep of the Blessed Aqsa Mosque, they shouted with joy: ‘Muhammad is dead, he left daughters behind.’”

Answer:

94. Admit present CAIR officers and directors each believe the Jews in 1967 “stood at the doorstep of the Blessed Aqsa Mosque, they shouted with joy: ‘Muhammad is dead, he left daughters behind.’”

Answer:

95. Admit Awad believes Israel, by virtue of its being Jewish and of having a Jewish population, defies Islam and the Muslims.

Answer:

96. Admit Ahmad believes Israel, by virtue of its being Jewish and of having a Jewish population, defies Islam and the Muslims.

Answer:

97. Admit Hooper believes Israel, by virtue of its being Jewish and of having a Jewish population, defies Islam and the Muslims.

Answer:

98. Admit CAIR’s current officers and directors each believe Israel, by virtue of its being Jewish and of having a Jewish population, defies Islam and the Muslims.

Answer:

99. Article Thirty-One of the Hamas Charter states in part:

Under the shadow of Islam it is possible for the members of the three religions: Islam, Christianity, and Judaism to coexist in safety and security. Safety and security can only prevail under the shadow of Islam, and recent and ancient history is the best witness to that effect. The members of other religions must desist from struggling against Islam over sovereignty in this region.

Answer:

100. Admit Awad believes the statement quoted in Request 99 is true.

Answer:

101. Admit Ahmad believes the statement quoted in Request 99 is true.

Answer:

102. Admit Hooper believes the statement quoted in Request 99 is true.

Answer:

103. Admit CAIR's officers and directors each believes the statement quoted in Request 99 is true.

Answer:

104. Admit Article Eleven of the Hamas Charter states in part:

Palestine is an Islamic Waqf throughout all generations and to the Day of Resurrection....This is the status [of the land] in Islamic Shari'a, and it is similar to all lands conquered by Islam by force, and made thereby Waqf lands upon their conquest, for all generations of Muslims until the Day of Resurrection.

Answer:

105. Admit Awad believes the statement quoted in Request 104 is true.

Answer:

106. Admit Ahmad believes the statement quoted in Request 104 is true.

Answer:

107. Admit Hooper believes the statement quoted in Request 104 is true.

Answer:

108. Admit CAIR's current officers and directors each believe the statement quoted in Request 104 is true.

Answer:

109. Admit Ahmad has had one or more communications with Marzook.

Answer:

110. Admit Awad has had one or more communications with Marzook.

Answer:

111. Admit Hooper has had one or more communications with Marzook.

Answer:

112. Admit Jaber has had one or more communications with Marzook.

Answer:

113. Admit past or present CAIR officers, directors, or agents have had one or more communications with Marzook.

Answer:

114. Admit Awad at Barry University on March 22, 1994, stated "after I researched the situation inside and outside of Palestine, I am in support of the Hamas movement."

Answer:

115. Admit Jaber is or was a person associated with IAP.

Answer:

116. Admit Mohammed Nimer is or was a person associated with the United Association for Studies and Research.

Answer:

117. Admit Marzook is or was a person associated with the United Association for Studies and Research.

Answer:

118. Admit Hooper is or was a person associated with IAP.

Answer:

119. Admit Hooper would like the government of the United States "to be Islamic sometime in the future."

Answer:

120. Admit Hooper supports payments of monies to the families of suicide bombers who kill Jews.

Answer:

121. Admit CAIR has distributed materials, including books and newspaper advertisements, using funds provided by foreign nationals, for the purpose of promoting Islam in the United States.

Answer:

122. Admit CAIR protested Marzook's extradition.

Answer:

123. Admit beginning on or about September 13, 2001, and continuing up until September 25, 2001, the CAIR website contained a section titled "What you can do for the victims of the WTC and Pentagon attacks" that solicited contributions for "the NY/DC Emergency Relief Fund."

Answer:

124. Admit the "NY/DC Emergency Relief Fund" link led directly to the HLF website.

Answer:

125. Admit on or about September 25, 2001, the "NY/DC Emergency Relief Fund" link disappeared and was replaced with direct links to HLF and the Global Relief Foundation ("GRF").

Answer:

126. Admit United States President George W. Bush stated HLF funded Hamas propaganda and terrorist recruitment efforts.

Answer:

127. Admit United States Treasury Secretary Paul O'Neill stated HLF masqueraded as a charity, while its primary purpose was to fund Hamas.

Answer:

128. Admit CAIR has received donations or contributions from HLF.

Answer:

129. Admit the United States Department of the Treasury ("Treasury") has stated GRF, and its officers and directors, were connected to, and provided support for, Usama bin Ladin ("UBL"). Al-Qaida, and other known terrorist groups.

Answer:

130. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from Saudi Funding Sources.

131. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from WAMY.

Answer:

132. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from IDB.

Answer:

133. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from MWL.

Answer:

134. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from IIRO and/or persons associated with IIRO.

Answer:

135. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from Haramain, and/or persons associated with Haramain.

Answer:

136. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from Talal, and/or persons associated with Talal.

Answer:

137. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from IIFSO, and/or persons associated with IIFSO.

Answer:

138. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from Sanabel, and/or persons associated with Sanabel.

Answer:

139. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from SARF, and/or persons associated with SARF.

Answer:

140. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from BIF, and/or persons associated with BIF.

Answer:

141. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from WISE, and/or persons associated with WISE.

Answer:

142. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from AMC, and/or persons associated with AMC.

Answer:

143. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from IIIT, and/or persons associated with IIIT.

Answer:

144. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from ICNA, and/or persons associated with ICNA.

Answer:

145. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from the Saudi Government, and/or persons associated with the Saudi Government.

Answer:

146. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from KSA, and/or persons associated with KSA.

Answer:

147. Admit Randall Todd Royer, a/k/a "Ismail" Royer ("Royer") was an employee of CAIR.

Answer:

148. Admit Royer engaged in illegal activity while he was an employee of CAIR.

Answer:

149. Admit Bassem Khafagi ("Khafagi") was a person associated with CAIR.

Answer:

150. Admit Khafagi engaged in illegal activity while he was a person associated with CAIR.

Answer:

151. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have requested donations or contributions for HLF.

Answer:

152. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have requested donations or contributions for GRF.

Answer:

153. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have requested donations or contributions for Hamas.

Answer:

154. Admit Elashi is or was a person associated with CAIR.

Answer:

155. Admit Elashi is or was a person associated with HLF.

Answer:

156. Admit CAIR shared a computer server with IAP.

Answer:

157. Admit CAIR, Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have obtained donations or contributions (including, but not limited to, goods, services, and computer-related assistance) from Infocom.

Answer:

158. Admit Siraj Wahaj ("Wahaj") is an un-indicted co-conspirator in the first World Trade Center bombing.

Answer:

159. Admit Wahaj has said the American government should be replaced with an Islamic caliphate

Answer:

160. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have had communications with persons associated with KSA.

Answer:

161. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have had communications with persons associated with SARF.

Answer:

162. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have had communications with persons associated with the Saudi Government.

Answer:

163. Admit one or more of these communications with KSA, or SARF, or the Saudi Government, in whole or in part, related to the use of CAIR and/or CAIR financial or bank accounts as a means or "conduit" for funding Islamic causes in the United States.

Answer:

164. Admit one or more of these communications with KSA, or SARF, or the Saudi Government, in whole or in part, related to the use of CAIR and/or CAIR financial or bank accounts as a means or "conduit" for funding opposition to the existence of the State of Israel.

Answer:

165. Admit one or more of these communications with KSA, or SARF, or the Saudi Government, in whole or in part, related to donations or contributions to CAIR.

Answer:

166. Admit one or more of these communications with KSA, or SARF, or the Saudi Government, in whole or in part, related to Saudi and/or Islamic public relation efforts in the United States.

Answer:

167. Admit one or more of these communications with KSA, or SARF, or the Saudi Government, in whole or in part, related to promoting Moslem religious beliefs in the United States.

Answer:

168. Admit one or more of these communications with KSA, or SARF, or the Saudi Government, in whole or in part, related to CAIR's efforts to promote Muslim political and social activism and/or media relations in the United States.

Answer:

169. Admit one or more of these communications with KSA, or SARF, or the Saudi Government, in whole or in part, related to responses to, and/or steps that could be taken to "neutralize," supporters of Israel, Judaism, and/or evangelical Christianity.

Answer:

170. Admit one or more of these communications with KSA, or SARF, or the Saudi Government, in whole or in part, related to donations or contributions for CAIR through Saudi Funding Sources.

Answer:

171. Admit these communications with KSA, or SARF, or the Saudi Government, in whole or in part, related to actions or measures CAIR and/or other Muslim groups could take to influence the result of the 2004 United States presidential election.

Answer:

172. Admit these communications with KSA, or SARF, or the Saudi Government, in whole or in part, related to actions or measures CAIR and/or other Muslim groups could take to influence outcome of 2004 United States House and Senate election races.

Answer:

173. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have requested donations or contributions from persons in Suspect Territories to assist CAIR in conducting its activities in the United States.

Answer:

174. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from persons in Suspect Territories to assist CAIR in conducting its activities in the United States.

Answer:

175. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have made donations or contributions to persons resident in, nationals or, or operating in Suspect Territories who seek the destruction of the State of Israel.

Answer:

176. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have requested donations or contributions for persons in Suspect Territories who advocate the destruction of the State of Israel.

Answer:

177. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have requested, or made, donations or contributions to persons who desire to transform the United States into a Muslim country.

Answer:

178. Admit CAIR has received donations or contributions from persons who support the conversion to Islam of Christians and Jews in the United States.

Answer:

179. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, support making the United States a Muslim country.

Answer:

180. Admit CAIR has had one or more communications with Marzook between 1994 and the present.

Answer:

181. Admit CAIR, Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have had one or more communications with person or persons associated with GRF.

Answer:

182. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have had at least one direct communication with persons associated with the Palestinian Authority since September 11, 2001.

Answer:

183. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have had at least one direct communication with persons associated with the Government of Syria since September 11, 2001.

Answer:

184. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have had at least one direct communication with a Named Person since September 11, 2001.

Answer:

185. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from Talal.

Answer:

186. Admit bin Talal is or has been a Major Donor or Contributor to CAIR.

Answer:

187. Admit CAIR has received donations or contributions from WAMY to publish advertisements in U.S. newspapers.

Answer:

188. Admit on September 16, 2000, Awad stated: "They [the Jews] have been saying 'next year to Jerusalem', we say 'next year to all of Palestine.'"

Answer:

189. Admit on September 16, 2000, Awad stated: "Hollywood has shown freedom fighters as terrorists. Hollywood has done the work that Zionists cannot do."

Answer:

190. Admit on October 13, 2000, CAIR co-sponsored a rally outside the Israeli Embassy in Washington where the speakers led the crowd in a chant: "*Khybar, Khybar, ya, ya Yahood, jesh Mohammed sofa ya'ud.*"

Answer:

191. Admit the phrase cited above translates as "Khybar Khybar, oh Jews, the army of Mohammed is coming for you."

Answer:

192. Admit the phrase referenced above is a refrain heard at demonstrations sponsored by Hamas.

Answer:

193. Admit Awad was editor of the Muslim World Monitor.

Answer:

194. Admit Awad was editor of the Muslim World Monitor at the time it published the statement that "there is ample evidence indicating that both the Mossad and the Egyptian Intelligence played a role in the explosion" during the first World Trade Center bombing.

Answer:

195. Admit Ahmad spoke at an IAP conference in 1999.

Answer:

196. Admit that at this conference, Ahmad said about suicide bombings: "Fighting for freedom, fighting for Islam – that is not suicide. They kill themselves for Islam."

Answer:

197. Admit CAIR Board Member Ihsan Bagby was quoted in Steve A. Johnson, "Political Activities of Muslims in America," in *The Muslims of America*, ed. Yvonne Yazbeck Haddad (New York: Oxford University Press, 1991), p. 115 substantially as follows: "Ultimately we can never be full citizens of this country...because there is no way we can be fully committed to the institutions and ideologies of this country."

Answer:

198. Admit CAIR Board Member Nabil Sadoun ("Sadoun") is or was a director of the Muslim Arab Youth Association ("MAYA").

Answer:

199. Admit Sadoun attended a MAYA conference in Los Angeles, CA, in or about December, 1994.

Answer:

200. Admit Sadoun is a former officer of MAYA.

Answer:

201. Admit a person known as Mohammed Siam or Siyam ("Siam") spoke at the MAYA conference referenced in Request 160.

Answer:

202. Admit Siam was introduced as: "head of operations of Al Jihad Al Ismalia in Gaza, the Hamas military wing."

Answer:

203. Admit Siam made the statement attributed to him in the fourth sentence of paragraph 41, Exhibit 32.

Answer:

204. Admit funds for Hamas were raised during MAYA meetings or conventions.

Answer:

205. Admit Sadoun was aware funds for Hamas were raised during MAYA meetings or conventions.

Answer:

206. Admit Sadoun is a former director of American Products International, Inc. ("API").

Answer:

207. Admit API has been identified as part of the Safa Group by federal authorities.

Answer:

208. Admit Sadoun was a director of the United Association for Studies and Research ("UASR") in Springfield, VA.

Answer:

209. Admit UASR received funds from Marzook.

Answer:

210. Admit UASR has sponsored, published, or approved documents calling for the destruction of the State of Israel.

Answer:

211. Admit UASR has sponsored, published, or approved documents calling for the killing of Jews or Zionists.

Answer:

212. Admit Sadoun supports the establishment of an Islamic state in place of the State of Israel.

Answer:

213. Admit Sadoun supports Hamas.

Answer:

214. Admit Sadoun has had at least one communication with Marzook since January 1, 1996.

Answer:

215. Admit Sadoun believes:

The prophet, prayer and peace be upon him, said: The time will not come until Muslims will fight the Jews (and kill them); until the Jews hide behind rocks and trees, which will cry: O Muslim! there is a Jew hiding behind me, come on and kill him!

Answer:

216. Admit Sadoun has made donations or contributions to a Named Person.

Answer:

217. Admit Sadoun has requested others make donations or contributions to a Named Person.

Answer:

218. Admit API is or has been a Major Donor or Contributor to CAIR.

Answer:

219. Admit MAYA is or has been a Major Donor or Contributor to CAIR.

Answer:

220. Admit USAR is or has been a Major Donor or Contributor to CAIR.

Answer:

221. Admit CAIR Board Member Parvez Ahmed ("Ahmed") is the registered agent for the Independent Writers Syndicate ("IWS").

Answer:

222. Admit IWS syndicates Arsalan Tariq Iftikhar, Riad Z. Abdelkarim, and Fedwa Wazwaz.

Answer:

223. Admit Ahmed supports the establishment of an Islamic state in place of the State of Israel.

Answer:

224. Admit Ahmed supports Hamas.

Answer:

225. Admit Ahmed has had at least one communication with Marzook.

Answer:

226. Admit Ahmed believes:

The prophet, prayer and peace be upon him, said: The time will not come until Muslims will fight the Jews (and kill them); until the Jews hide behind rocks and trees, which will cry: O Muslim! there is a Jew hiding behind me, come on and kill him!

Answer:

227. Admit Ahmed has made donations or contributions to a Named Person.

Answer:

228. Admit Ahmed has requested others make donations or contributions to a Named Person.

Answer:

229. Admit CAIR Board Member Fouad Khateeb ("Khateeb") is also known as Fouad Al-Khateeb and/or Muhammad Fouad Al-Khateeb.

Answer:

230. Admit Khateeb is a Saudi national.

Answer:

231. Admit Khateeb is a person affiliated with the Saudi government.

Answer:

232. Admit Khateeb is a person affiliated with the Saudi royal family.

Answer:

233. Admit Khateeb supports the establishment of an Islamic state in place of the State of Israel.

Answer:

234. Admit Khateeb supports Hamas.

Answer:

235. Admit Khateeb has had at least one communication with Marzook.

Answer:

236. Admit Khateeb believes:

The prophet, prayer and peace be upon him, said: The time will not come until Muslims will fight the Jews (and kill them); until the Jews hide behind rocks and trees, which will cry: O Muslim! there is a Jew hiding behind me, come on and kill him!

Answer:

237. Admit Khateeb has made donations or contributions to a Named Person.

Answer:

238. Admit Khateeb has requested others make donations or contributions to a Named Person.

Answer:

239. Admit CAIR Board Member Ahmad Al-Akhras ("Al-Akhras") is or was a member of IAP.

Answer:

240. Admit Al-Akhras has made donations or contributions to HLF.

Answer:

241. Admit Al-Akhras has requested others make donations or contributions to HLF and GRF.

Answer:

242. Admit Al-Akhras is or was a MAYA member.

Answer:

243. Admit Al-Akhras has had at least one direct communication with person(s) affiliated with the Saudi government.

Answer:

244. Admit Al-Akhras supports the establishment of an Islamic state in place of the State of Israel.

Answer:

245. Admit Al-Akhras is a supporter of Hamas.

Answer:

246. Admit Al-Akhras has had at least one direct communication with Marzook.

Answer:

247. Admit Al-Akhras believes:

The prophet, prayer and peace be upon him, said: The time will not come until Muslims will fight the Jews (and kill them); until the Jews hide behind rocks and trees, which will cry: O Muslim! there is a Jew hiding behind me, come on and kill him!

Answer

248. Admit Al-Akhras has made donations or contributions to a Named Person.

Answer:

249. Admit Al-Akhras has requested others make donations or contributions to a Named Person.

Answer:

250. Admit CAIR has had at least one direct communication with Elashi.

Answer:

251. Admit Ahmad has had at least one direct communication with Elashi.

Answer:

252. Admit Awad has had at least one direct communication with Elashi.

Answer:

253. Admit Hooper has had at least one direct communication with Elashi.

Answer:

254. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have requested donations or contributions for Named Persons.

Answer:

255. Admit CAIR has received donations or contributions from HLF.

Answer:

256. Admit CAIR has received donations or contributions from GRF.

Answer:

257. Admit CAIR has received donations or contributions from the SAAR

Foundation and/or its members and related entities.

Answer:

258. Admit CAIR has received donations or contributions from the Muslim Arab

Youth Association.

Answer:

259. Admit CAIR has received donations or contributions from the Muslim Student

Association.

Answer:

260. Admit CAIR has received donations or contributions from IAP.

Answer:

261. Admit CAIR has received donations or contributions from the Islamic

Assembly of North America.

262. Admit CAIR has received donations or contributions from the Islamic Circle

of North America (ICNA).

Answer:

263. Admit CAIR has received donations or contributions from the Islamic

Foundation of America.

Answer:

264. Admit CAIR has received donations or contributions from Named Persons.

Answer:

265. Admit CAIR has received donations or contributions from nationals, residents, or persons with operations in those territories commonly called the West Bank and Gaza.

Answer:

266. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have requested third persons make donations or contributions to one or more Named Persons.

Answer:

267. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have made donations or contributions to one or more Named Persons.

268. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have made donations or contributions to nationals, residents, or persons with operations in those territories commonly called the West Bank and Gaza.

Answer:

269. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have solicited donations or contributions for Named Persons at the request of Named Persons.

Answer:

270. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have requested third persons make donations or contributions to Identified Terrorists.

Answer:

271. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from Identified Terrorists.

Answer:

272. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have requested third persons make donations or contributions to persons who support Terrorism.

Answer:

273. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have requested third persons make donations or contributions to persons who support Terrorist Activity.

Answer:

274. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have requested third persons make donations or contributions to persons who Engage in Terrorist Activity.

Answer:

275. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from persons who support Terrorism.

Answer:

276. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from persons who support Terrorist Activity.

Answer:

277. Admit CAIR, and/or Ahmad, Awad, Jaber, Hooper, and/or past or present CAIR officers, directors, or agents, have received donations or contributions from persons who Engage in Terrorist Activity.

Answer:

278. Admit CAIR is a "public figure."

Answer:

279. Admit CAIR is a "limited-purpose public figure."

Answer:

280. Admit the alleged defamatory statements in this action relate to "matters of public concern" as a matter of law.

Answer:

281. Admit the alleged defamatory statements in this action are statements of Opinion.

Answer:

282. Admit Awad believes "jihad" is correctly defined in Exhibit 34.

Answer:

283. Admit Ahmad believes "jihad" is correctly defined in Exhibit 34.

Answer:

284. Admit Hooper believes "jihad" is correctly defined in Exhibit 34.

Answer:

285. Admit Sadoun believes "jihad" is correctly defined in Exhibit 34.

Answer:

286. Admit Ahmed believes "jihad" is correctly defined in Exhibit 34.

Answer:

287. Admit Khateeb believes "jihad" is correctly defined in Exhibit 34.

Answer:

288. Admit Al-Akhras believes "jihad" is correctly defined in Exhibit 34.

Answer:

289. Admit Awad is a Named Person.

Answer:

290. Admit Ahmad is a Named Person.

Answer:

291. Admit Awad is identified in the FBI Memorandum.

Answer:

292. Admit Ahmad is identified in the FBI Memorandum.

Answer:

293. Admit Ahmad attended a meeting in Philadelphia, PA, in August 2004.

Answer:

294. Admit he met and/or had communications with some or all of the following persons: Abdelhaleem Ashqar, Haitham Maghawri, Shukri Abu Bakr, Elashi, Mohamed El-Mezain, Abdel-Jabbar Hamdan, Ismail Elbarasse, Abdul Rahman Baraski (or "Barajki").

Answer:

Answer:

285. Admit Sadoun believes "jihad" is correctly defined in Exhibit 34.

Answer:

286. Admit Ahmed believes "jihad" is correctly defined in Exhibit 34.

Answer:

287. Admit Khateeb believes "jihad" is correctly defined in Exhibit 34.

Answer:

288. Admit Al-Akhras believes "jihad" is correctly defined in Exhibit 34.

Answer:

289. Admit Awad is a Named Person.

Answer:

290. Admit Ahmad is a Named Person.

Answer:

291. Admit Awad is identified in the FBI Memorandum.

Answer:

292. Admit Ahmad is identified in the FBI Memorandum.

Answer:

293. Admit Ahmad attended a meeting in Philadelphia, PA, in August 2004.

Answer:

294. Admit he met and/or had communications with some or all of the following persons: Abdelhaleem Ashqar, Haitham Maghawri, Shukri Abu Bakr, Elashi, Mohamed El-Mezain, Abdel-Jabbar Hamdan, Ismail Elbarasse, Abdul Rahman Baraski (or "Barajki").

Answer:

295. Admit Ahmad shared a hotel room with Baraski/Barajki.

Answer:

296. Admit Ahmad stated: “[w]e can’t, as an American organization, say we represent Samah. Can we go to Congressman and tell him, I am Omar Yehya, Chairman of the Union, Yassir Arafat doesn’t represent me, but Ahmad Yasin does?”

Answer:

297. Admit Awad attended the meeting identified in request 293.

Answer:

298. Admit Ahmad was a person associated with the American Middle Eastern League for Palestine.

Answer:

299. Admit Baraski (or Barakji) was a member of CAIR’s “National Board” in 1995.

Answer:

300. Admit Baraski (or Barakji) was a director of CAIR-Northern California.

Answer:

301. Admit Exhibit 43 is a true and complete Copy of a document titled “al-Taqiyya/Dissimulation” which appears in three parts at www.al-islam.org/encyclopedia/chapter6b/1.html, www.al-islam.org/encyclopedia/chapter6b/2.html, and www.al-islam.org/encyclopedia/chapter6b/3.html, respectively.

Answer:

302. Admit Ahmad believes the concept of “al-Taqiyya” is a part of the religion of Islam.

295. Admit Ahmad shared a hotel room with Baraski/Barajki.

Answer:

296. Admit Ahmad stated: "[w]e can't, as an American organization, say we represent Samah. Can we go to Congressman and tell him, I am Omar Yehya, Chairman of the Union, Yassir Arafat doesn't represent me, but Ahmad Yasin does?"

Answer:

297. Admit Awad attended the meeting identified in request 293.

Answer:

298. Admit Ahmad was a person associated with the American Middle Eastern League for Palestine.

Answer:

299. Admit Baraski (or Barakji) was a member of CAIR's "National Board" in 1995.

Answer:

300. Admit Baraski (or Barakji) was a director of CAIR-Northern California.

Answer:

301. Admit CAIR issued a press release in 1994 stating in relevant part:

1. Palestine is an Islamic and Arabic land which no one has the right to trade, sell, or give up
2. The current situation of the Arab states is at a weakness stage that must end sooner or later, and rights can't be lost with signing agreements.
3. Rabin-Hussien [sic] agreement is merely a step taken to establish coexistence between the two countries in order to pave the way for the Zionists to dominate and penetrate the ME region....

Answer:

303. Admit Awad believes the concept of “al-Taqiyya” is a part of the religion of Islam.

Answer:

304. Admit Hooper believes the concept of “al-Taqiyya” is a part of the religion of Islam.

Answer:

305. Admit Sadoun believes the concept of “al-Taqiyya” is a part of the religion of Islam.

Answer:

306. Admit Jaber believes the concept of “al-Taqiyya” is a part of the religion of Islam.

Answer:

307. Admit Khateeb believes the concept of “al-Taqiyya” is a part of the religion of Islam.

Answer:

308. Admit Ahmed believes the concept of “al-Taqiyya” is a part of the religion of Islam.

Answer:

309. Admit Al-Ahkras believes the concept of “al-Taqiyya” is a part of the religion of Islam.

Answer:

310. Admit the concept of “al-Taqiyya” allows a Muslim to lie when necessary to prevent harm or injury to herself.

Answer:

311. Admit the concept of “al-Taqiyya” allows a Muslim to lie when necessary to prevent harm or injury to Islam.

Answer:

312. Admit the concept of “al-Taqiyya” is sanctioned during war.

Answer:

313. Admit Awad has stated “Islam is under attack” in the United States.

Answer:

314. Admit Ahmad has stated “Islam is under attack” in the United States.

Answer:

315. Admit Hooper has stated “Islam is under attack” in the United States.

Answer:

316. Admit CAIR, in a press release dated December 19, 2002, stated federal charges against Elashi “result from what appears to be a ‘war on Islam and Muslims’ rather than a ‘war on terror.’”

Answer:

317. Admit CAIR, in a press release dated November 19, 2004, stated “the perception held by many in the Muslim world [is] that the war on terror is turning into a war on Islam.”

Answer:

318. Admit Ahmad shares the perception that the war on terror is turning into a war on Islam.

Answer:

319. Admit Awad shares the perception that the war on terror is turning into a war on Islam.

Answer:

320. Admit Hooper shares the perception that the war on terror is turning into a war on Islam.

Answer:

321. Admit Sadoun shares the perception that the war on terror is turning into a war on Islam.”

Answer:

322. Admit Khateeb shares the perception that the war on terror is turning into a war on Islam.

Answer:

323. Admit Al-Ahkras shares the perception that the war on terror is turning into a war on Islam.

Answer:

324. Admit Ahmed shares the perception that the war on terror is turning into a war on Islam.

Answer:

325. Admit CAIR stated that freezing HLF assets “could could create the impression that there has been a shift from a war on terrorism to an attack on Islam.”

Answer:

326. Admit Hooper stated in response to the nomination of Daniel Pipes to the United States Institute of Peace: "Pipes' appointment calls into question all of President Bush's previous statements claiming that the war on terrorism is not an attack on Islam and shows disdain(sic) for the democratic process."

Answer:

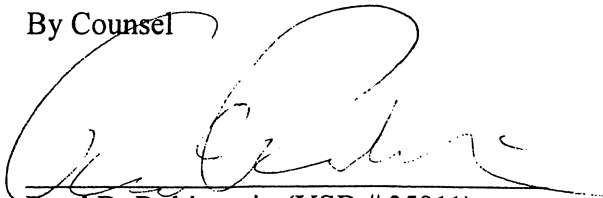
327. Admit CAIR issued a press release in 1994 stating in relevant part:

1. Palestine is an Islamic and Arabic land which no one has the right to trade, sell, or give up
2. The current situation of the Arab states is at a weakness stage that must end sooner or later, and rights can't be lost with signing agreements.
3. Rabin-Hussien [sic] agreement is merely a step taken to establish coexistence between the two countries in order to pave the way for the Zionists to dominate and penetrate the ME region....

Answer:

Dated: January 7th, 2005.

Respectfully submitted,
ANDREW WHITEHEAD
By Counsel



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CERTIFICATE OF SERVICE

I certify that on January 16, 2005, I mailed a copy of the foregoing Defendant's First Set of Requests to Admit via first class mail to:

Jeremiah A. Denton III
VBN#19191
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Virginia Beach, VA 23452

