

249. On December 14, 2001, Bosnian Federation Police searched the offices of Global Relief Foundation. The search confirmed Global Relief Foundation's sponsorship of al Qaida's activities in Bosnia and elsewhere. Accordingly, Bosnian officials shut down Global Relief Foundation's operations in the country.

250. On February 21, 2002, FBI officials interviewed Mustafa Ait-Idar, another employee of Taibah's Bosnian offices, who confirmed that Taibah International assumed representation of Global Relief Foundation's interests after the Bosnian government closed Global Relief Foundation's offices in Bosnia.

251. As the forgoing demonstrates, Taibah International has, for a period of many years and in diverse regions throughout the world, provided critical financial and logistical support to al Qaida in relation to that terrorist organization's global jihad.

252. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of Taibah International's participation in al Qaida's jihadist campaign.

#### **AL QAIDA'S PARTNERS IN THE INTERNATIONAL BANKING SYSTEM**

253. During testimony before Congress, U.S. Treasury Department General Counsel David Aufhauser estimated that al Qaida had an annual budget of approximately \$35 million in the years leading up to September 11, 2001.

254. Like any global criminal enterprise, al Qaida's survival required that it develop safe and efficient mechanisms to launder and distribute the funds required to sustain its global operations to individuals and entities operating within its infrastructure throughout the world.

255. The scope of al Qaida's global operations, the number of entities operating within its infrastructure, and the extent of its funding required that al Qaida resort to the international banking system to facilitate the distribution and laundering of its funds. At

the same time, al Qaida needed to avoid triggering any of the regulatory devices developed by the international banking system to identify money laundering and illicit financial transactions.

256. Al Qaida gained access to the international banking system, and concealed the illicit nature of the transactions it conducted through that system, by establishing its own financial institutions in under-regulated jurisdictions, and by establishing relationships with banks operating within the Islamic banking system that shared al Qaida's perverse worldview and were willing collaborators in its global jihad.

257. Like the charity defendants, the financial institutions established by al Qaida and its partner banks within the Islamic banking system operated as fully integrated components of the al Qaida's financial and logistical infrastructure. These banks knowingly maintained accounts for individuals and organizations operating within al Qaida's infrastructure, and facilitated transfers between those entities. Many of these banks also directly funded al Qaida's global operations. Once deposited with or laundered through one of the banks operating within its infrastructure, al Qaida could move funds throughout the world by exploiting correspondent banking relationships.

258. Absent the material support and sponsorship of the banks operating within its infrastructure, as further detailed herein, al Qaida would have remained a regional extremist organization incapable of conducting large scale terrorist attacks on a global scale.

### **THE AL TAQWA FINANCIAL NETWORK**

259. Bank Al Taqwa was established in 1988 by defendants Youssef Mustafa Nada and Ahmed Idris Nasreddin. Bank Al Taqwa is a close affiliate of Al Taqwa Management Organization, which changed its name in the spring of 2000 to the Nada

Management Organization. Youssef Nada also controlled Al-Taqwa Trade, Property and Industry Company, Ltd., B.A. Taqwa for Commerce and Real Estate Company, Ltd., and Nada International Anstalt.

260. In addition to his interest in Bank Al Taqwa, Ahmed Idris Nasreddin controlled the Mega-Malaysian Swiss, Gulf and African Chamber, Gulf Centre SRL, Nascoservice SRL, Nasco Business Residence Centre SAS, Nasreddin Company Nasco SAS, Nasreddin Foundation, Nascotex and Nasreddin International Group, Ltd. Holding.

261. Defendants Nada and Nasreddin also maintained controlling interests in the Akida Bank.

262. The corporations and organizations controlled by Nada and Nasreddin are deeply intertwined, and have long provided financial services and other forms of material support to al Qaida.

263. Nada and Nasreddin serve on the Boards of each other's banks and companies and, in many cases, operate those organizations from the same locations using the same employees. Nada and Nasreddin, and the companies they controlled, were closely tied in with several Islamic charities and business ventures, which have been linked to al Qaida financing, including the Milan Islamic Center, a major al Qaida recruiting center in Europe.

264. On November 7, 2001, the United States government designated Youssef Nada, Bank Al Taqwa, its affiliated businesses and key executives, under Executive Order 13224. Thereafter, on April 19, 2002, the United States Government designated Ahmed Idris Nasreddin pursuant to Executive Order 13224.

265. On August 29, 2002, the United States Government designated an additional fourteen companies associated with Nada and Nasreddin pursuant to Executive Order 13224.

266. In the press statement issued in conjunction with the August 29, 2002 designations, the Treasury Department stated as follows:

Based on information available to Italy and the United States, Youssef Nada (“Nada”) and Ahmed Idris Nasreddin (“Nasreddin”), through commercial holdings, operated an extensive financial network providing support for terrorist related activities. In the case of Nada and Nasreddin, this involves an extensive conglomeration of businesses from which they derive their income or through which they conduct transactions. Based on evidence of their support of terrorism, Nada and Nasreddin were previously designated by the international community as financiers of terror. Nada was designated by the United States on November 7, 2001, and by the United Nations on November 9, 2001. Nasreddin was designated by the G7 on April 19, 2002, and by the United Nations on April 24, 2002.

Nasreddin’s corporate holdings and financial network provide direct support for Nada and Bank Al Taqwa, which was also previously designated by the United State on November 7, 2001, and the United Nations on November 9, 2001. This designation of 14 additional entities owned or controlled by either Nada or Nasreddin will further restrict their assets and their network by precluding these companies from being used to provide funding or support for terrorism.

Nasreddin and Nada, who have worked closely together for many years, are both Directors of Bank Al Taqwa and the Akida Bank. Nada holds a controlling interest in Bank Al Taqwa and Nasreddin holds a controlling interest in Akida Bank. Bank Al Taqwa and Akida Bank are not functional banking institutions in the conventional sense. They are shell companies lacking a physical presence and sharing the same address in the Bahamas where they were licensed. For this reason, the licenses of Bank Al Taqwa and Akida Bank have been revoked by the Bahamian government.

Bank Al Taqwa, for which Nasreddin is a Director, was established in 1988 with significant backing from the

Muslim Brotherhood. They have been involved in financing radical groups such as the Palestinian Hamas, Algeria's Islamic Salvation Front and Armed Islamic Group, Tanzania's On-Nahda, and Osama Bin Laden and his al Qaida organization. Bank Al Taqwa was established in the Bahamas and is a close affiliate of the Al Taqwa Management Organization, which changed its name in the spring of 2000 to the Nada Management Organization. In 1997, it was reported that the \$60 million collected annually for Hamaas was moved to Bank Al Taqwa accounts. As of October, 2000, Bank Al Taqwa appeared to be providing a clandestine line of credit to a close associate of Osama bin Laden and as of late September 2001, Osama bin Laden and his al Qaida organization received financial assistance from Youssef M. Nada.

Nada and Nasreddin own or control a number of business entities through direct ownership, control, or in cooperation with each other. Fourteen of these entities are being designated in furtherance of the prior designation of these two individuals to disrupt their use of assets under their ownership or control that could be used to finance terrorist activities.

267. Many of al Qaida's most significant individual sponsors and supporters have held positions with one or more of the corporations and organizations controlled by Nada and Nasreddin. Youssef Al-Qardawi, a member of the Muslim Brotherhood, and Abdel Fattah Abu Ghadda, a member of the Syrian Muslim Brotherhood, both serve on Al Taqwa's Shariah Board. Albert Friedrich Armand Huber (a/k/a Ahmed Huber), and Ali Ghalib Himmat, both Executive Order 13224 designees, both served as officers of the bank. In addition, Suleiman Abdul Aziz Al Rajhi worked for the Akida Bank in the Bahamas. Al Rajhi is the CEO of Al Rajhi Banking and Investment, a member of the Board of Directors of IIRO, and the founder of the SAAR Network of charities and businesses.

268. As the forgoing demonstrates, the al Taqwa financial network has, for a period of many years, provided critical financial and logistical support to al Qaida in relation to that terrorist organization's global jihad.

269. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of the al Taqwa financial network's participation in al Qaida's jihadist campaign.

### **AL BARAKAAT GROUP**

270. The Al Barakaat Group is a financial conglomerate, headquartered in Dubai, that operates in 40 countries, including the United States. The founder of the organization, Shaykh Ahmed Nur Jemale, has close links with Osama bin Laden and has used the organizations within the Al Barakaat Group to facilitate the financing of al Qaida and other terrorist organizations.

271. The Al Barakaat Group includes business ventures in telecommunications, construction and currency exchange. According to former Treasury Secretary, John O'Neill, the Al Barakaat Companies are "a principal source of funding, intelligence and money transfers for bin Laden."

272. On November 7, 2001, the United States Government designated Al Barakaat Exchange LLC and the following affiliated organizations pursuant to Executive Order 13224, based on their material support and sponsorship of al Qaida: Aaron Money Wire Service, Inc., Al Baraka Exchange LLC, Al-Barakaat, Al-Barakaat Bank, Al-Barakat Bank of Somalia, Al-Barakat Finance Group, Al-Barakat Financial Holding Company, Al-Barakat Global Telecommunications, Al-Barakat Group of Companies Somalia Limited, Al-Barakat International (a/k/a Baraco Co.), Al-Barakat Investments, Al-Barakat Wiring Service, Baraka Trading Company, Barakaat Boston, Barakaat Construction Company, Barakaat Enterprise, Barakaat Group of Companies, Barakaat International, Barakaat International Foundation, Barakaat International, Inc., Barakaat North America, Inc., Barakaat Red Seat Telecommunications, Barakaat Telecommunications Co. Somalia, Barakat Bank and Remittances, Barakat Computer

Consulting (BCC), Barakat Consulting Group (BCG), Barakat Global Telephone Company, Barakat International Companies (BICO), Barakat Post Express (BPE), Barakat Refreshment Company, Barakat Wire Transfer Company, Barakat Telecommunications, Ltd. (BTelco), Barako Trading Company, LLC, Global Services International, Parka Trading Company, Red Sea Barakat Company, Ltd, Somalia International Relief Organization, Somalia Internet Company and Somalia Network AB.

273. As the forgoing demonstrates, the Al Barakaat Group has, for a period of many years, provided critical financial and logistical support to al Qaida in relation to that terrorist organization's global jihad.

274. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of the Al Barakaat Group's participation in al Qaida's jihadist campaign.

#### **AL RAJHI BANKING AND INVESTMENT GROUP**

275. Al Rajhi Banking and Investment Corporation (Al Rajhi Bank) is a Saudi Arabia based bank with 400 branch offices within the Kingdom, and 17 subsidiaries across the world.

276. Al Rajhi Bank is a family owned enterprise, in which defendant Suleiman Abdel Aziz Al Rajhi holds the largest personal investment. Suleiman Abdel Aziz Al Rajhi serves as the Chairman and Managing Director of Al Rajhi Bank.

277. Suleiman Abdel Aziz Al Rajhi also serves on the Board of Directors of the IIRO, and as a member of the Ibn Baz Foundation, which is chaired by Prince Salman. Al Rajhi is also the founder and principal financier of many of the ostensible charities and for-profit enterprises comprising the SAAR Network.

278. Al-Rajhi Bank has served as one of al Qaida's preferred banks for many years, maintaining accounts for many of the charity defendants that operate within al

Qaida's infrastructure, including the IIRO, MWL, WAMY, BIF and Al Haramain, among others.

279. In cooperation with the charities operating within al Qaida's infrastructure, Al Rajhi Bank advertises the existence and numerical designations of the accounts it maintains for those charities throughout the Muslim world, and provides a mechanism to allow al Qaida's supporters to deposit funds directly into those accounts. Through this mechanism, Al Rajhi Bank facilitates al Qaida's fundraising efforts.

280. The accounts maintained by Al Rajhi on behalf of the charities operating within al Qaida's infrastructure, and in particular accounts it maintained for al Haramain and IIRO, have been used to transfer funds to al Qaida cells throughout the world.

281. Al Rajhi Bank has long known that the accounts it maintained for many ostensible charities were being used to solicit and transfer funds to terrorist organizations, including al Qaida. In fact, Suleiman Abdul Aziz Al Rajhi directly participates in the management, funding and operation of several of those charities, including the MWL and IIRO. Through his involvement in the affairs of those charities, Al Rajhi has known, for a period of many years, of their extensive sponsorship of al Qaida's operations, and consequently that the accounts maintained by Al Rajhi Bank on behalf of those organizations were being used to channel funds to al Qaida.

282. Despite this knowledge, Al Rajhi Bank has continued to maintain those accounts. In doing so, Al Rajhi knowingly provided financial services and other forms of material support to al Qaida.



283. As the forgoing demonstrates, Al Rajhi Bank has, for a period of many years, provided critical financial and logistical support to al Qaida in relation to that terrorist organization's global jihad.<sup>35</sup>

284. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of Al Rajhi Bank's participation in al Qaida's jihadist campaign.

### **NATIONAL COMMERCIAL BANK**

285. The National Commercial Bank was established in 1950 by Salim bin Mahfouz, father of defendant Khalid bin Mahfouz.

286. With his father's death in 1996, Khalid bin Mahfouz became President and CEO of National Commercial Bank. Khalid bin Mahfouz served as President and CEO of National Commercial Bank until 1999, when the Kingdom of Saudi Arabia bought out bin Mahfouz's controlling interest in the bank.

287. Since 1999, the Kingdom of Saudi Arabia has owned a controlling interest in National Commercial Bank, and operated the bank as an agency, instrumentality and organ of the Kingdom.

288. Throughout the 1980s and early 1990s, the National Commercial Bank was closely related to, and often worked in collaboration with, the Bank of Credit and Commerce International (BCCI), a banking institution in which Khalid bin Mahfouz held a substantial equitable interest and served as the CEO. A federal investigation into BCCI's operations revealed extensive involvement in corrupt practices, including money laundering, hiding assets, the obstruction of a Senate investigation and the sponsorship of international terrorism.

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<sup>35</sup> Additional factual allegations relating to al Rajhi Bank's material sponsorship of al Qaida are set forth in the Amended RICO Statement attached hereto as Exhibit 31, which is incorporated herein by reference.

289. A 1992 U.S. Senate Investigative Report regarding BCCI's fraudulent activities directly implicated National Commercial Bank in BCCI's corrupt practices, including the manipulation of financial markets, arms trafficking and sponsorship of international terrorism, including handling the finances of Abu Nidal and his terrorist organization.

290. Consistent with the findings of the Senate Investigative Report, National Commercial Bank has served as one of al Qaida's preferred banks for many years, maintaining accounts for many of the charity defendants that operate within al Qaida's infrastructure, including the IIRO, MWL, WAMY, BIF, Blessed Relief (Muwafaq) Foundation and al Haramain, among others. Under the supervision of Suleiman Abdul Aziz al-Rajhi, National Commercial Bank also managed the budget of SJRC.

291. In cooperation with the charities operating within al Qaida's infrastructure, National Commercial Bank advertises the existence and numerical designations of the accounts it maintains for those charities throughout the Muslim world, and provides a mechanism to allow al Qaida supporters to deposit funds directly into those accounts. Through this mechanism, National Commercial Bank facilitates al Qaida's fundraising efforts.

292. The accounts maintained by National Commercial Bank on behalf of the charities operating within al Qaida's infrastructure, and in particular accounts it maintains for IIRO, SJRC and Blessed Relief Foundation, have been used to transfer funds to al Qaida cells throughout the World. During the 1990s, National Commercial Bank channeled in excess of \$74 million to al Qaida through IIRO, and also transferred significant funding to al Qaida through Blessed Relief Foundation accounts it maintained.

293. National Commercial Bank has long known that the accounts it maintains for many ostensible charities were being used to solicit and transfer funds to terrorist organizations, including al Qaida. In fact, Khalid bin Mahfouz directly participates in the management, funding and operation of several of those charities, including the Blessed Relief Foundation and BIF. Through his involvement in the affairs of those charities, bin Mahfouz has known, for a period of many years, of their sponsorship of al Qaida's operations, and consequently that the accounts maintained by National Commercial Bank on behalf of those organizations were being used to channel funds to al Qaida.

294. Despite this knowledge, National Commercial Bank has continued to maintain those accounts. In doing so, National Commercial Bank has knowingly provided financial services and other forms of material support to al Qaida.

295. Through accounts with the National Commercial Bank, wealthy relatives of defendant Abdulrahman Alamoudi, residing within Saudi Arabia, have transferred large sums of money to Alamoudi to support terrorist operations.

296. As the forgoing demonstrates, National Commercial Bank has, for a period of many years, provided critical financial and logistical support to al Qaida in relation to that terrorist organization's global jihad.<sup>36</sup>

297. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of National Commercial Bank's participation in al Qaida's jihadist campaign.

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<sup>36</sup> Additional factual allegations relating to National Commercial Bank's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 32, which is incorporated herein by reference.

## **AL BARAKA INVESTMENT AND DEVELOPMENT CORPORATION**

298. Al Baraka Investment and Development Compant (Al Baraka) is a wholly owned subsidiary of Dallah al Baraka Group, LLC. Al Baraka is headed by defendant Saleh Kamel.

299. Al Baraka has knowingly maintained accounts for many of the charity defendants that operate within al Qaida's infrastructure, including the IIRO, MWL, WAMY, BIF and Al Haramain, among others.

300. In cooperation with the charities operating within al Qaida's infrastructure, Al Baraka advertises the existence and numerical designations of the accounts it maintains for those charities throughout the Muslim world, and provides a mechanism to allow al Qaida's supporters to deposit funds directly into those accounts. Through this mechanism, Al Baraka facilitates al Qaida's fundraising efforts.

301. The accounts maintained by Al Baraka on behalf of the charities operating within al Qaida's infrastructure, and in particular accounts it maintained for al Haramain, have been used to transfer funds to al Qaida cells throughout the world. Accounts maintained by Al Baraka on behalf of al Haramain have served as a principal vehicle for funding al Qaida's operations in Bosnia, according to Bosnian officials.

302. Al Baraka has long known that the accounts it maintained for many ostensible charities were being used to solicit and transfer funds to terrorist organizations, including al Qaida.

303. Despite this knowledge, Al Baraka has continued to maintain those accounts. In doing so, Al Baraka knowingly provided financial services and other forms of material support to al Qaida.

304. In addition, Al Baraka has provided substantial support to al Qaida through its subsidiaries and affiliates, including Al Shamal Islamic Bank, Tadamon Islamic Bank and al Aqsa Bank, as further described herein.

305. As the forgoing demonstrates, Al Baraka has, for a period of many years, provided critical financial and logistical support to al Qaida in relation to that terrorist organization's global jihad.<sup>37</sup>

306. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of Al Rajhi Bank's participation in al Qaida's jihadist campaign.

#### **DAR-AL-MAAL AL ISLAMI**

307. Beginning in the early 1980's, Saudi Arabia channeled massive financial support for the spread of Wahhabism, the radical brand of Islam at the heart of the al Qaida ideology, through a complex banking system that had at its center two entities: Dar-Al-Maal Al Islami ("DMI"), chaired until recently by Prince Mohammed Al Faisal Al Saud; and Dallah Al-Baraka. Endowed with enormous funding, these institutions served the Saudi government's goals in two ways: they helped to boost the Kingdom's financial preeminence in the Arab World, and they gave extensive support for radical Islamic causes.

308. DMI, or the House of Islamic money, was created on July 29, 1981 and is headquartered in Switzerland. Its main subsidiaries are the Islamic Investment Company of the Gulf, the Faisal Islamic Bank of Bahrain, and Faisal Finance. Until October 1983, the President of DMI was defendant Ibrahim Kamel.

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<sup>37</sup> Additional factual allegations relating to the material sponsorship of al Qaida by Al Baraka, Saudi Dallah al Baraka Group and Saleh Kamel are set forth in the Amended RICO Statements attached hereto as Exhibits 33 and 34, both of which are incorporated herein by reference.

309. Kamel was replaced as President of DMI on October 17, 1983 by Prince Mohammad Al Faisal Al Saud, who ran the Bank until the year 2000.

310. Like other Islamic banking institutions, DMI abides by *sharia* or Islamic law, which prohibits the earning or payment of interest. DMI operates by participating in investments, sharing profits on projects, and earning fees for services performed. One of the obligations imposed on Islamic banking systems under *sharia* is the duty to contribute and manage Zakat funds. Consistent with this obligation, Islamic banking institutions set aside a percentage of funds associated with each transaction as Zakat. As a practical matter, these funds disappear from the bank's books and can be used to fund radical Islamic organizations.

311. DMI has actively sponsored and supported the al Qaida movement through several of its subsidiaries, including but not limited to, the Faisal Islamic Bank of Bahrain, Faisal Finance, Tadamon Islamic Bank, and Al Shamal Islamic Bank, as described herein.<sup>38</sup>

312. Mohammad Al Faisal Al Saud chairs Islamic Investment Company of the Gulf, as well as Faisal Islamic Bank of Sudan. Osama bin Laden's brother, Haydr Mohammad bin Laden, served as a Director of the Islamic Investment Company of the Gulf.

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<sup>38</sup> Additional factual allegations detailing the companies comprising DMI, the relationships among the DMI companies, and the material sponsorship of al Qaida by DMI member companies Dar Al Maal Al Islami Trust, DMI Administrative Services, S.A., Faisal Islamic Bank of Sudan, Al Shamal Islamic Bank of Sudan, and Tadamon Islamic Bank of Egypt, are set forth in the Amended RICO Statement attached hereto as Exhibit 35, which is incorporated herein by reference.

## **FAISAL ISLAMIC BANK – SUDAN**

313. Faisal Islamic Bank of the Sudan is a subsidiary of the Islamic Investment Company of the Gulf. Faisal Islamic Bank of the Sudan is one of the founders of Al Shamal Islamic Bank, which was largely capitalized by Osama bin Laden.

314. Faisal Islamic Bank of Sudan has long provided financial services and other forms of material support to al Qaida.

315. During the 2001 trial of the al Qaida conspirators who conducted the 1998 African Embassy bombings in Kenya and Tanzania, Jamal Ahmed Al-Fadl, al Qaida's financial chief in Khartoum, Sudan, testified that al Qaida maintained accounts with the Faisal Islamic Bank of the Sudan.

316. At all times material hereto, Faisal Islamic Bank of Sudan knew that al Qaida cells maintained accounts with the bank, and that those accounts were being used to launder and distribute funds for al Qaida operations and terrorist attacks.

317. Despite its express knowledge that accounts it maintained were being used to launder and distribute funds for al Qaida operations and terrorist attacks, Faisal Islamic Bank continued to maintain those accounts. In doing so, Faisal Islamic Bank knowingly provided financial services and other forms of material support to al Qaida.

318. As the forgoing demonstrates, Faisal Islamic Bank has, for a period of many years, provided critical financial and logistical support to al Qaida in relation to that terrorist organization's global jihad.<sup>39</sup>

319. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of Faisal Islamic Bank's participation in al Qaida's jihadist campaign.

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<sup>39</sup> Additional factual allegations relating to Faisal Islamic Bank's material sponsorship of al Qaida are set forth in the Amended RICO Statement attached hereto as Exhibit 36, which is incorporated herein by reference.

## **AL SHAMAL ISLAMIC BANK**

320. Al Shamal Islamic Bank (Al Shamal Bank) was established in the Republic of Sudan in or around 1983.

321. When Osama bin Laden relocated al Qaida's leadership structure to the Sudan in 1991, he invested heavily in businesses and infrastructure projects in the Sudan, in order to strengthen al Qaida's collaborative relationship with the ruling National Islamic Front regime. Bin Laden's extensive investment in the Sudan during this period is described in a 2002 Congressional Research Service Report as follows:

In 1991, bin Laden relocated to Sudan with the approval of Sudan National Islamic Front (NIF) leader Hasan al-Turabi. There, in concert with NIF leaders, [bin Laden] built a network of businesses including an Islamic bank (Al Shamal), an import/export firm, and firms that exported agricultural products. An engineer by training, bin Laden also used his family connections in the construction business to help Sudan build roads and airport facilities. The business in Sudan... enabled him to offer safe haven and employment in Sudan to al Qaida members, promoting their involvement in radical Islamic movements in their countries of origin (especially Egypt) as well as anti-US terrorism.

322. According to the State Department, bin Laden invested approximately \$50 million in Al Shamal Bank. Other shareholders of Al Shamal Bank include defendant Saleh Abdullah Kamel, Omar Abdullah Kamel, al Baraka Investment and Development, Faisal Islamic Bank and the Sudanese Government.

323. According to published reports, Osama bin Laden remains the principal shareholder in Al Shamal Bank.

324. Al Shamal Bank has long provided financial services and other forms of material support to al Qaida.



325. Al Shamal Bank has maintained accounts for many of the charity defendants that operate within al Qaida's infrastructure, including the IIRO, MWL, WAMY, BIF and al Haramain, among others.

326. The accounts maintained by Al Shamal Bank, on behalf of the charities operating within al Qaida's infrastructure, have been used to transfer funds to al Qaida cells throughout the world.

327. Al Shamal Bank also maintained accounts on behalf of, and invested capital in, many of the commercial enterprises established by Osama bin Laden in the Sudan to fund al Qaida's global operations, including: Wadi al-Aqiq Company, Ltd.; Ladin International Company; Taba Investment Company, Ltd.; al-Hijrah for Construction and Development; and the Themar al Mubarak Company.

328. According to Al Shamal Bank's general manager, Mohammad S. Mohammad, Al Shamal also maintained three personal accounts for Osama bin Laden between 1992 and 1997. Bin Laden wired al Qaida member Essam al Ridi \$230,000 from one of those accounts to purchase a used jet in Arizona. According to al Ridi, bin Laden wanted the plane to ship Stinger anti-aircraft missiles from Pakistan to Sudan.

329. According to Jamal Ahmed Mohamed al Fadl, an al Qaida operative convicted in the 1998 bombings of the U.S. embassies in Kenya and Tanzania, al Qaida used accounts at Al Shamal Bank to finance terrorist operations, including the embassy attacks. Al Fadl further testified that al Qaida operatives maintained accounts at the bank openly, and regularly received disbursements from accounts at the bank to fund their activities.

330. Al Shamal Bank has long known that the accounts it maintained for Osama bin Laden, members of al Qaida, and many businesses and ostensible charities,

were being used to solicit and transfer funds to terrorist organizations, including al Qaida. Despite this knowledge, Al Shamal Bank has continued to maintain those accounts. In doing so, Al Shamal Bank knowingly provided financial services and other forms of material support to al Qaida.

331. The transfer of funds to al Qaida through accounts maintained by the Al Shamal Bank has been facilitated by the direct involvement of several senior al Qaida officials in the bank's management and operation. Defendant Adel Abdul Jalil Batterjee serves as the Chairman of Al Shamal Islamic Bank. As discussed previously, Batterjee is a senior official of al Qaida, and has served as a chairman of BIF and WAMY. Batterjee's longstanding involvement in al Qaida's global operations is detailed at length in the U.S. government's Santiago proffer in the criminal prosecution of Enaam Arnaout.

332. As the forgoing demonstrates, Al Shamal Bank has, for a period of many years, provided critical financial and logistical support to al Qaida in relation to that terrorist organization's global jihad.

333. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of Al Shamal Bank's participation in al Qaida's jihadist campaign.

#### **TADAMON ISLAMIC BANK**

334. Tadamon Islamic Bank is a Sudanese based banking institution, established in or around 1983.

335. The shareholders of Tadamon Islamic Bank include al Baraka Investment and Development Corporation, Saleh Abdullah Kamel, National Company for Development and Trade, Dubai Islamic Bank and Faisal Islamic Bank of Sudan.

336. Tadamon Islamic Bank has long provided financial services and other forms of material support to al Qaida.

337. According to Jamal Ahmed Mohamed al Fadl, an al Qaida operative convicted in connection with the 1998 bombings of the U.S. embassies in Kenya and Tanzania, Tadamon Islamic Bank openly managed accounts of al Qaida operatives, including Abdouh al Mukhlafi, who served as Osama bin Laden's bodyguard while al Qaida's leadership structure was in the Sudan.

338. Tadamon Islamic Bank is also a shareholder of Al Shamal Bank, another institution that has provided material support and sponsorship to al Qaida.

339. At all times material hereto, Tadamon Islamic Bank was aware that al Qaida cells maintained accounts with the bank, and that those accounts were being used to launder and distribute funds for al Qaida operations and terrorist attacks.

340. Despite its express knowledge that accounts it maintained were being used to launder and distribute funds for al Qaida operations and terrorist attacks, Tadamon Islamic bank continued to maintain those accounts. In doing so, Tadamon Islamic Bank knowingly provided financial services and other forms of material support to al Qaida.

341. As the forgoing demonstrates, Tadamon Islamic Bank has, for a period of many years, provided critical financial and logistical support to al Qaida in relation to that terrorist organization's global jihad.

342. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of Tadamon Islamic Bank's participation in al Qaida's jihadist campaign.

#### **DUBAI ISLAMIC BANK**

343. Dubai Islamic Bank is a financial institution headquartered in the United Arab Emirates, which holds significant equitable interests in Tadamon Islamic Bank, Al Shamal Bank and entities associated with al Baraka Bank.

344. Dubai Islamic Bank has long provided financial services and other forms of material support to al Qaida, including the transfer of financial resources to al Qaida operatives who participated in the planning and execution of the September 11<sup>th</sup> Attack and African Embassy bombings.

345. Investigations into the financing of the September 11<sup>th</sup> Attack have confirmed that Mustafa Ahmed al Hisawi, a senior al Qaida financial official, transferred funds from an account at the Dubai Islamic Bank to September 11<sup>th</sup> hijackers Marwan al Sheehi and Mohamed Atta.

346. Dubai Islamic Bank has long known that accounts it maintained were being used to to launder and distribute funds for al Qaida operations and terrorist attacks.

347. Despite its express knowledge that accounts it maintained were being used to launder and distribute funds for al Qaida operations and terrorist attacks, Dubai Islamic bank continued to maintain those accounts. In doing so, Dubai Islamic Bank knowingly provided financial services and other forms of material support to al Qaida.

348. Dubai Islamic bank has further sponsored al Qaida through its interest in Al Shamal Bank, Al Tadamon Bank and various al Baraka entities.

349. As the forgoing demonstrates, Dubai Islamic Bank has, for a period of many years, provided critical financial and logistical support to al Qaida in relation to that terrorist organization's global jihad.<sup>40</sup>

350. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of Dubai Islamic Bank's participation in al Qaida's jihadist campaign.

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<sup>40</sup> Additional factual allegations relating to Dubai Islamic Bank's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 37, which is incorporated herein by reference.

### **ISLAMIC DEVELOPMENT BANK**

351. Islamic Development Bank formally began operations in 1975 under the rules of the organization of the Islamic Conference System, in accordance with the principles of Islamic *sharia*.

352. Of the 54 national shareholders, Saudi Arabia is by far the largest, contributing 27.33% of the subscribed capital.

353. Islamic Development Bank has allocated significant grants to several Islamic Centers in the United States, including the Al-Noor School in Brooklyn, New York, an institution which advocates Islamic extremism and jihad.

354. In July of 1999, the Islamic Development Bank gave a grant of \$250,000 for the Washington based Counsel on American Islamic Relations (CAIR) for refurbishment of its offices. Since September 11, 2001, three CAIR officials have been indicted by the Federal Government on terrorist charges. CAIR received a substantial portion of its initial seed money from the Holy Land Foundation for Relief and Development, an organization designated under Executive Order 13224 on December 4, 2001. CAIR has also received assistance from WAMY.

355. Through its funding of ostensible charities operating within al Qaida's infrastructure, Islamic Development Bank has long provided material support and resources to al Qaida.

356. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of Islamic Development Bank's participation in al Qaida's jihadist campaign.

### **ARAB BANK, PLC**

357. Arab Bank, PLC is a financial institution headquartered in Egypt, with branch offices throughout the world, including offices in New York.

358. Arab Bank has long provided financial services and other forms of material support to terrorist organizations, including al Qaida.

359. Spanish investigators have confirmed that al Qaida transferred money to the Spanish logistical cell that funded the September 11<sup>th</sup> Attack through Arab Bank. Arab Bank accounts have also been used to distribute funds to al Qaida cells in other parts of the world.

360. Arab Bank also maintains accounts for many of the charity defendants that operate within al Qaida's infrastructure, including the IIRO, MWL, WAMY, BIF, Blessed Relief (Muwafaq) Foundation and al Haramain, among others. The Kingdom of Saudi Arabia uses these accounts to fund al Qaida operations, and as the principal vehicle for supporting Palestinian suicide attacks.

361. More recently, Israeli officials seized funds associated with several accounts maintained by Arab Bank on behalf of known Hamas fronts. These accounts were identified to Israeli officials by Arab Bank employees, confirming the bank's specific knowledge that accounts it maintained were being used to sponsor terrorist activity.

362. Arab Bank has long known that accounts it maintained were being used to solicit and transfer funds to terrorist organizations, including al Qaida. Despite this knowledge, Arab Bank has continued to maintain those accounts. In doing so, Arab Bank knowingly provided financial services and other forms of material support to al Qaida.

363. As the forgoing demonstrates, Arab Bank has, for a period of many years, provided critical financial and logistical support to al Qaida in relation to that terrorist organization's global jihad.<sup>41</sup>

364. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of Arab Bank's participation in al Qaida's jihadist campaign.

#### **SAUDI AMERICAN BANK**

365. Saudi American Bank is a financial institution headquartered in Riyadh, Saudi Arabia. Saudi American Bank was established by royal decree in 1980, and operates as an agency and instrumentality of the Kingdom of Saudi Arabia.

366. Saudi American Bank has long provided financial services and other forms of material support to terrorist organizations, including al Qaida.

367. Saudi American Bank financed many of the projects undertaken by Osama bin Laden and al Qaida in the Sudan during the years that the al Qaida leadership structure operated from that country, including the construction of major roads and the Port of Sudan airport. The Saudi Binladin Group and Mohamed Binladin Organization provided technical assistance on these projects.

368. Through its participation in the projects undertaken by Osama bin Laden in Sudan, Saudi American Bank knowingly provided material support and resources to al Qaida.

369. Saudi American Bank has maintained accounts for many of the ostensible charities that operate within al Qaida's infrastructure, including MWL, WAMY, IIRO and al Haramain, among others.

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<sup>41</sup> Additional factual allegations relating to Arab Bank's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 38, which is incorporated herein by reference.

370. In cooperation with the charities operating within al Qaida's infrastructure, Saudi American Bank advertises the existence and numerical designation of the accounts it maintains for those charities throughout the Muslim world, and provides a mechanism to allow al Qaida supporters to deposit funds directly into those accounts. Through this mechanism, Saudi American Bank facilitates al Qaida's fundraising efforts.

371. The accounts maintained by Saudi American Bank on behalf of the charities operating within the al Qaida's infrastructure, and in particular, accounts it maintained for IIRO, WAMY and al Haramain, have been used to transfer funds to al Qaida cells throughout the World.

372. Saudi American Bank has long known that accounts it maintained for many ostensible charities were being used to solicit and transfer funds to terrorist organizations, including al Qaida. Despite this knowledge, Saudi American Bank has continued to maintain those accounts. In doing so, Saudi American Bank knowingly provided financial services and other forms of material support to al Qaida.

373. Saudi American Bank also serves as the Saudi Arabia correspondent for many other banks within al Qaida's infrastructure, including Al Shamal Bank.

374. As the forgoing demonstrates, Saudi American Bank has, for a period of many years, provided critical financial and logistical support to al Qaida in relation to that terrorist organization's global jihad.<sup>42</sup>

375. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of Saudi American Bank's participation in al Qaida's jihadist campaign.

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<sup>42</sup> Additional factual allegations relating to Saudi American Bank's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 39, which is incorporated herein by reference.