

Charity Work Abroad,<sup>15</sup> have aided and abetted, conspired with, and provided material support and resources to, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons, as described herein.

## **II. JURISDICTION**

67. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1332(a)(2) (diversity), and 28 U.S.C. § 1350 (Alien Tort Claims Act).

68. The jurisdiction of this Court over defendants Iran, Iraq, Sudan, Syria and Saudi Arabia is invoked pursuant to 28 U.S.C. § 1330, as the claims against those defendants fall within the exceptions to immunity set forth at 28 U.S.C. §§ 1605(a)(2), 1605(a)(5) and 1605(a)(7) (Foreign Sovereign Immunities Act).

69. Venue in this district is proper pursuant to § 408(b)(3) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, and 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1).

## **III. FACTUAL BACKGROUND**

70. On September 11, 2001, nineteen (19) members of the al Qaida terrorist network hijacked four (4) commercial airliners, and used those planes as weapons in a coordinated terrorist attack on the World Trade Center Complex in New York and the Pentagon in Arlington, Virginia (the “September 11<sup>th</sup> Attack”).

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<sup>15</sup> The claims against the Saudi Committee for Relief and Charity Work Abroad are predicated on the conduct of its predecessor in interest charities, including Al Haramain Islamic Foundation, Benvolence International Foundation, Waqf Foundation, Saudi Joint Relief Committee for Kosovo and Chechnya and Saudi High Commission for Bosnia and Herzegovina. Additional Factual allegations relating to the Saudi Committee for Relief and Charity Work Abroad’s status as successor in interest to those charities are set forth in the More Definite Statement attached hereto as Exhibit 17, which is incorporated herein by reference.

71. The September 11<sup>th</sup> Attack resulted in the tragic loss of several thousand lives, personal injuries to countless other persons, and property damage on a catastrophic scale, including the complete destruction of the World Trade Center Complex.

72. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of a larger conspiracy among the defendants, to commit acts of international terrorism against the United States, its nationals and allies.

73. The conspiracy among the defendants to commit acts of international terrorism against the United States, its nationals and allies, included the provision of material support and resources to defendant al Qaida and affiliated foreign states, FTOs, persons, organizations, commercial entities and other parties, as discussed herein.

74. Absent the material support and resources provided by the co-defendants, both directly and indirectly, al Qaida would not have possessed the financial resources, physical assets, membership base, technological knowledge, communication skills, and global reach required to conceive, plan and execute the September 11<sup>th</sup> Attack.

### **ORIGINS OF AL QAIDA**

75. The al Qaida movement has its origins in the “holy war” against the Soviet occupation of Afghanistan. During the 1980s, mujihadeen fighters from throughout the Muslim world came to Afghanistan to fight the Soviet Red Army and defend Afghani Muslims. From the early stages of the conflict, Osama bin Laden provided financial, organizational, and engineering aid to the mujihadeen in Afghanistan, at the behest of the Kingdom of Saudi Arabia. Together with Abdullah Azzam, bin Laden founded an organization known as the Makhtab al Khidmat (“The Office of Services”), to facilitate the provision of financial and logistical support to the mujihadeen.

76. Throughout the conflict with the Soviet Red Army, the Makhtab al Khidmat worked closely with a number of purported charities and relief organizations to provide travel documents, funds, transportation, training, facilities, arms, physical assets and other logistical support to the mujihadeen. In collaboration with one another, these ostensible charities and relief organizations established a vast financial and logistical infrastructure to support the mujihadeen opposition to the Soviet occupation of Afghanistan. The ostensible charities that operated within that infrastructure included the Muslim World League, International Islamic Relief Organization, Benevolence International Foundation a/k/a Lajnat al-Birr al-Islamiyya, and the Saudi Red Crescent, among others.

77. Shortly before the Soviet Army withdrew from Afghanistan in 1989, Osama bin Laden became determined to spread the jihadist movement to regions outside of Afghanistan, and to wage war with the United States of America, which he believed to be the true enemy of Islam. In furtherance of that objective, bin Laden established al Qaida. At the time of its establishment, al Qaida had only fifteen (15) members. Over the course of the next thirteen- (13) years, al Qaida grew to include several thousand members, associates, and supporters, with operational and logistical cells in every corner of the globe. By September 11, 2001, al Qaida also served as an umbrella organization for other like minded terrorist groups, through which it frequently conducted terrorist attacks.

78. Using the system developed to support the mujihadeen fighters in Afghanistan as a model, al Qaida relied, from its inception, on a complex infrastructure of ostensible charities, relief organizations, mosques, banks, financial institutions, wealthy sponsors, and for-profit enterprises to fuel its phenomenal development and

global expansion. This international support infrastructure sustained al Qaida when it moved from Afghanistan to the Sudan in 1991, and when it was forced to relocate back to Afghanistan in 1996. Absent this international support infrastructure, al Qaida would have remained a regional extremist organization, without the capacity to conduct acts of international terrorism.

### **GENERAL ALLEGATIONS COMMON TO ALL CHARITY DEFENDANTS**

79. Ostensible charitable organizations, and in particular, Islamic charities under the control of the Kingdom of Saudi Arabia, have played a singularly important role in al Qaida's development and pursuit of its perverse ambitions. These "charities" have served as the primary vehicle for raising, laundering and distributing funds on behalf of al Qaida from its inception. In addition, these charities have provided arms, false travel documentation, physical assets and logistical support to al Qaida. In many cases, senior members of the al Qaida movement have served as senior representatives of the charities, and used their employment status with the charities to shield their direct involvement in planning, coordinating, organizing, funding and conducting acts of international terrorism. Facilities of the charities, including the branch offices, have served as safe houses for al Qaida operatives, and bases for planning and launching operations. These charities are fully integrated components of al Qaida's organizational structure, and are actively involved at every level of al Qaida's operations, from recruitment and training of new members, to the planning and conduct of terrorist attacks.

80. In describing the integral role of charitable organizations in al Qaida's global operations, the United Nations Security Council Committee concerning al Qaida and the Taliban recently stated:

From its inception, al-Qaida has relied heavily on charities and donations from its sympathizers to finance its

activities. Charities provide al-Qaida with a very useful international channel for soliciting, collecting, transferring and distributing the funds it needs for indoctrination, recruitment, training, and logistical and operational support. These funds are often merged with and hidden among funds used for other legitimate humanitarian or social programs. Al-Qaida supporters and financiers have also established front charity networks whose main purpose is to raise and deliver funds to al-Qaida. The roots of these charity networks stem from the anti-Soviet Jihad in Afghanistan during the last 1980s. During that time, al-Qaida could draw on a number of state-assisted charities and other deep pocket donors that supported the anti-Soviet cause.

Today, al-Qaida continues to rely heavily on those charities to facilitate and mask the collection and movement of its funds.

81. The longstanding involvement of purported charities in the sponsorship of Islamic terrorist organizations is further evidenced by a recently declassified 1996 Report of the Central Intelligence Agency. In that report, the author states as follows:

Of the 250 local and foreign-based non-governmental charitable organizations (NGOs) that operate worldwide, over 50 are international Islamic NGOs conducting humanitarian work. Available information indicates that approximately 1/3 of the Islamic NGOs support terrorist groups or employ individuals who are expected of having terrorist connections.

82. International investigations since September 11, 2001 have further exposed the pervasive involvement of purported charitable organizations in the al Qaida movement. As a result of those investigations, the United States Government has designated the following purported charities as sponsors and supporters of al Qaida or an affiliated FTO under the Executive Order 13224 designation program: al Haramain Foundation, Benevolence International Foundation, Blessed Relief (Muwafaq) Foundation, Holy Land Foundation for Relief and Development, Global Relief Foundation, al Rashid Trust, Wafa Humanitarian Organization and Revival of Islamic

Heritage Society. Investigations regarding the terrorist activities of a number of additional ostensible charities, including the Muslim World League, World Assembly of Muslim Youth and International Islamic Relief Organization, are continuing.

83. Absent the pervasive and critical infrastructure and support provided by the charity defendants, as further described herein, al Qaida would have forever remained a regional extremist organization, without the capacity to conduct large scale terrorist attacks on a global scale.

#### **BENEVOLENCE INTERNATIONAL FOUNDATION**

84. Defendant Benevolence International Foundation (BIF) is an ostensible charity, with offices located throughout the World.<sup>16</sup> BIF is the successor in interest to Lajnat al Biarr al Islamiyya, which was established by defendant Adel Batterjee in 1987 in Pakistan. BIF is a subsidiary body of the Muslim World League, and has frequently shared common officers and directors with that organization.

85. BIF is an agency, instrumentality and organ of the Kingdom of Saudi Arabia. The Kingdom controls and directs BIF operations, appoints and terminates BIF personnel, provides BIF with virtually all of its funding, determines how funds will be distributed throughout the World, and otherwise stringently controls BIF's operations. In many countries, BIF conducts operations from the local Saudi embassy, under the supervision of the embassy's Islamic Affairs Division.

86. BIF has long acted as a fully integrated component of al Qaida's logistical and financial support infrastructure, and provided material support and resources to al Qaida and affiliated FTOs.

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<sup>16</sup> The various offices comprising BIF's international operations, all of which operate under the direction and control of the organization's headquarters, are identified with greater particularity in the More Definite Statement attached hereto as Exhibit 18, which is incorporated herein by reference.

87. On November 19, 2002, the United States government designated BIF, and several related entities, as financiers of terrorism pursuant to Executive Order 13224.

The Treasury Department press release relating to the designation stated as follows:

Benevolence International Foundation (“BIF”) is a US tax-exempt not-for-profit organization whose stated purpose is to conduct humanitarian relief projects through the World. BIF was incorporated in the State of Illinois on March 30, 1992. Although BIF is incorporated in the United States, it operates around the World, in Bosnia, Chechnya, Pakistan, China, Ingushetia, Russia, and other nations. BIF operates as Benevolence International Fund in Canada and as both Bosanska Idealna Futura in Bosnia.

Enaam Arnaout, BIF’s chief executive officer and a member of the Board of Directors, recently was indicted in the United States for operating BIF as a racketeering enterprise and providing material support to organizations, including al Qaida that are engaged in violent activities.

Substantial evidence documents the close relationship between Arnaout and Usama bin Laden, dated from the mid-1980s. An article in the Arab News from 1998, reporting on bin Laden’s activities at the “al Masada” mujahideen camp in Afghanistan, included a photograph of Arnaout and bin Laden walking together. In a March 2002 search of BIF’s offices, Bosnia law enforcement authorities discovered a host of evidence linking Arnaout to bin Laden and al Qaida. Among the files were scanned letters between Arnaout and bin Laden, under their aliases.

In one handwritten letter, bin Laden indicates that Arnaout is authorized to sign on bin Laden’s behalf.

Various documents also establish that Arnaout worked with others – including members of al Qaida – to purchase rockets, mortars, rifles, and offensive and defensive bombs, and to distribute them to various mujahideen camps, including camps operated by al Qaida.

Arnaout claimed to the Chicago Tribune last winter that he did not know bin Laden personally, that he had never been to the “al Masada” camp (at which he had been photographed walking with bin Laden), and that he was working in a restaurant in the Persian Gulf area during the

relevant time frame. BIF's counsel later acknowledged in court that "it would appear that the nature of [Arnaout] contacts [with bin Laden] may have been of a deeper nature than what he described to the Tribune.

BIF has also provided additional support for and has been linked in other ways to al Qaida and its operatives. First, BIF lent direct logistical support in 1998 to Mamdouh Mahmud Salim, a bin Laden lieutenant present at the founding of al Qaida. Salim was indicted for conspiring to kill U.S. nationals. Testimony at the 2001 trial of United States v. bin Laden, et al., implicated Salim in efforts to develop chemical weapons on behalf of al Qaida in the 1990s. As early as 1992, Salim and bin Laden made efforts to develop conventional weapons and to obtain nuclear weapons components. BIF is also linked to Mohamed Loay Bayazid, who was implicated in the US embassy bombing trial for his efforts, approved by Salim, to obtain weapons components on behalf of bin Laden in 1993 – 1994. Bayazid's driver's license application, dated September 12, 1994, identifies his address as the address of BIF's Illinois office. In the late 1990s, Saif al Islam el Masry, a member of al Qaida's Maglis al Shura (consultation counsel), served as an officer in BIF's Chechnya office.

88. On January 6, 2003, federal prosecutors filed a Santiago proffer in the criminal prosecution of Enaam Arnaout referenced above. The evidentiary proffer, which is incorporated herein by reference, details at length the pervasive involvement of BIF, and of its executives and employees, in sponsoring al Qaida's global operations, describing the provision of material support and sponsorship to al Qaida as BIF's "core mission."

89. As set forth in greater detail in the Santiago proffer, BIF materially supported al Qaida and al Qaida affiliated militants in Afghanistan, Sudan, Bosnia-Herzegovina, Chechnya and other areas. For a period of more than 15 years, BIF representatives used the cover of their employment with BIF to shield their direct involvement in providing material support to Osama bin Laden, al Qaida, Gulbuddin



Hekmatyar and Hezb e Islami. The support provided by BIF included purchasing large quantities of weapons, operating radio communications, providing physical assets and false travel documents to al Qaida fighters, and sponsoring al Qaida camps throughout the World.

90. BIF worked closely with several other purported charities, including the World Assembly of Muslim Youth, Muslim World League, International Islamic Relief Organization, and Al Haramain Foundation, in connection with its efforts to sponsor al Qaida's activities.

91. Founding members of al Qaida, including Enaam Arnaut, Wa'el Julaidan, Abu Rida al Suri (Mohammed Loay Bayazid), and Abu Hajar al Iraqi (Mandouh Salim), have served as officials of BIF.

92. In 1990, while Enaam Arnaut was ostensibly working for BIF, he participated with other al Qaida members in the purchase of weapons for al Qaida, including AK assault rifles and mortar rounds. These weapons were ultimately delivered to al Qaida camps within Afghanistan, under Enaam Arnaut's supervision.

93. In 1991, Osama bin Laden decided to relocate al Qaida's leadership structure and principal training camps to the Sudan, under the protection of the ruling National Islamic Front regime. Al Qaida remained in Sudan for a period of five (5) years, during which it worked closely with the National Islamic Front, the Sudanese Intelligence Service, and the Popular Defense Force.

94. When the al Qaida leadership structure relocated to Sudan in 1991, BIF immediately opened an office in the Sudan, to support al Qaida in its new location. BIF's sponsorship of al Qaida in the Sudan mirrored how it had worked with al Qaida in Afghanistan prior to 1991.

95. In 1992 the al Qaida leadership, including Osama bin Laden, made a strategic decision to become deeply involved in the ongoing ethnic conflict in the Balkan region, in order to establish relationships and a base of operations to support future al Qaida attacks in Europe. Towards that objective, al Qaida sent its mujihadeen fighters to Bosnia, to train and fight alongside members of the Bosnian Muslim Army.

96. From the outset, BIF played a pivotal role in al Qaida's efforts to establish operations in Bosnia. BIF provided food, clothing, money and communications' equipment to al Qaida affiliated fighters in Bosnia. BIF facilitated the movement of hundreds of al Qaida mujihadeen fighters into the region, by falsely representing to authorities that those terrorists would be working as BIF relief workers.

97. Within the Muslim world, BIF made little effort to conceal its support for al Qaida's operations in Bosnia. In its Arabic language fundraising appeals, BIF advertised itself as a "trustworthy hand for the support of [both] the Mujahideen and refugees" in Bosnia. Similarly, documents recovered during a federal raid of BIF's Illinois office in December 2001 included handwritten Arabic notations explaining that its headquarters in Croatia was established "for relief operations in support of Jihad in Bosnia/Herzegovina...contribute with your Mujahideen brothers to repel the Crusader/Zionist attack on Muslim lands."

98. The federal raid of BIF's Illinois office uncovered the following additional documents confirming the scope and extent of BIF's sponsorship of al Qaida's efforts in Bosnia: a receipt dated July 21, 1994, from the "Black Swans" Bosnian Muslim commando brigade for 300 blankets and 200 pairs of boots obtained from BIF; a receipt from the BiH Army dated June 3, 1994, for 2000 uniforms, 2000 pairs of shoes, and 10 "mass communication stations" donated by BIF to "this military unit;" a request dated

December 31, 1994, from the Bosnian military for a combat ambulance, later delivered as promised in January 1995; and, a memorandum to BIF director Enaam Arnaout, dated November 17, 1995 describing the recent contribution of 200 tents to the Muslim army.

99. In March 2002, Bosnian police raided BIF's Sarajevo offices. During the raid, investigators recovered extensive documentation relating to al Qaida's operations from BIF's computer system, including internal al Qaida documents detailing the contributions of various individuals and purported charities to the terrorist organization's development and expansion. As is discussed in greater detail in the U.S. government's Santiago proffer in the Arnaout prosecution, the computer system housed a file labeled "Tareekh Osama" ("Osama's History"), containing scanned images of documents chronicling the formation of al Qaida. BIF also maintained scanned documents in a voluminous "Tareekh al Musadat" file, detailing the history of al Qaida's Al Masada training camp, as well as an "Al Jabal" file containing daily reports of activities at the Al Jabal camp, operated by the al Qaida affiliated Hizb e Islami.

100. The documents contained within the aforementioned files confirm the long term and global participation of BIF, MWL, Rabita Trust, and other purported charities in al Qaida's support infrastructure.

101. Within the Tareekh Osama file, investigators also uncovered a document called the "Golden Chain." According to officials of the U.S. government, this document is "a list of people referred to within al Qaida" as wealthy donors to the al Qaida movement. Among the individuals identified in the Golden Chain as al Qaida's principal sponsors are Suleiman al-Rashid, Abdulkader al Bakri a/k/a Abdel Qader Bakri, Bakr Bin Laden, Youseff Jameel, Ibrahim Muhammad Afandi, Saleh Abdullah Kamel, Suleiman Abdulaziz al Rajhi, Mohammad bin Abdullah al-Jomaih, Abulrahman Hassan Sharbalty,

Ahmed Mohamed Naghi, Khalid Bin Mahfouz Adel Faqih a.k.a Abdel Qader Faqeeh, Salahuddin Abduljawad a/k/a Salah al-Din Abdel Jawad, Ahmad Turki Yamani a/k/a Ahmed Zaki Yamani, Abdul Hadi Taher, Ahmad al Harbi Mohammed al-Issai, Hamad al Hussaini, Mohamed Omar and al Kuwait.

102. In conjunction with the March raid of BIF's regional headquarters in Sarajevo, Bosnian police detained its manager, Munib Zahiragic, a former intelligence officer affiliated with the Bosnian Foreign Ministry. Zahiragic turned over secret documents regarding al Qaida activities in Bosnia, including transcripts of communications between BIF management and senior commanders of al Qaida based in Afghanistan. The Bosnian officials also discovered firearms, ski masks, numerous military manuals on topics including small arms and explosives, fraudulent passport materials, and photographs of Osama bin Laden during the raid.

103. BIF played an equally important role in the infrastructure supporting al Qaida's activities in Chechnya. Recognizing that the best way to transfer supplies into Chechnya was through Azerbaijan, BIF established a branch office in Baku, Azerbaijan to serve as a conduit for military supplies to al Qaida militants in Chechnya. Al Qaida lieutenant Saif ul Islam al Masri (a/k/a Abu Islam al Masri) served as BIF's charge d'affaires in the Chechen capital of Grazni, at the end of the supply chain. Saif ul Islam was a member of al Qaida's military committee and had graduated from an expert training course in explosives conducted by the Iranian backed Hezbollah terrorist group in Southern Lebanon. Saif also trained Somali Muslim militiamen to shoot down U.S. helicopters during the United Nations' humanitarian mission in the Horn of Africa in the early 1990s. His passport photograph was recovered during a search in 1997 of Kenyan residents suspected of belonging to a local al Qaida cell. During this time period, Saif

was in direct contact via telephone from Baku with the Kenyan terrorist cell led by Wadih el Hage, who was responsible for relaying messages between Saif ul Islam in the Caucuses and the military committee of al Qaida in Afghanistan, which included Muhammed Atef and Osama bin Laden.

104. Within Chechnya, BIF provided material support to al Qaida fighters supporting the Chechen mujihadeen in the form of anti-mine boots, an x-ray machine, military uniforms and cash, in direct contravention of governing United Nations resolutions.

105. Within the United States, BIF's operations within the United States were headquartered in Illinois and run by senior al Qaida lieutenants Enaam Arnaout and Mohammed Laoy Bayazid, both founding members of the al Qaida movement. In the New York area, BIF was represented by Saffet Abid Catovich, a prominent leader of radical islamic elements in Bosnia-Herzegovina.

106. BIF engaged in extensive efforts to cover the nature of its operations within the United States from the public, going so far as to draft separate mission statements for internal and external purposes. While the external drafts portray BIF as a pure relief agency, the internal documents make clear that BIF's primary mission was the support of jihad and al Qaida mujihadeen.

107. Enaam Arnaout spoke with Munib Zahiragic while he was in the custody of Bosnian officials. During the conversation, Zahiragic advised Arnaout that the Bosnian officials had recovered various documents relating to al Qaida activities in Bosnia. Upon learning of the nature of the materials recovered in the raid, Arnaout ordered Zahiragic to conceal from authorities the involvement of other BIF

representatives in the sponsorship of al Qaida activities, including Arnaout's own involvement.

108. BIF's U.S. arm used the U.S. financial system extensively to launder money for al Qaida and support its terrorist operations throughout the world. Between June 2000 and September 2001, members of the al Qaida movement transferred in excess of \$1,000,000 via wire from an account at Union Bank at Switzerland to BIF's checking account in the United States. Those funds were co-mingled in BIF's checking account with donations the BIF Enterprise received from other sources and dispersed in large part to BIF offices overseas.

109. BIF substantially understated the amount of funds it received from the Swiss bank account in its 2000 tax returns, and did not attribute a substantial portion of the funds to a known source.

110. Between January 4, 2000 and April 11, 2000, BIF sent 19 wire transfers from its checking account with Citibank to the bank accounts of Jordan Relief Association, MADLEE in Tbilisi, Georgia and BIF's accounts in Baku, Azerbaijan; Moscow, Russia; and Riga, Latvia, to support al Qaida mujihadeen fighters in Chechnya.

111. As the forgoing demonstrates, BIF 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.

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

### **THE MUSLIM WORLD LEAGUE**

113. Founded in 1962 by the Kingdom of Saudi Arabia, the Muslim World League (MWL) is among the world's largest Islamic charitable organizations, with

offices in more than thirty (30) countries.<sup>17</sup> The MWL serves as an umbrella organization for a number of other Islamic charities, commonly referred to as bodies or members of the League, including the International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain & al Aqsa Mosque Foundation, Benevolence International Foundation and Rabita Trust, among others.

114. MWL is an agency, instrumentality and organ of the Kingdom of Saudi Arabia. The Kingdom controls and directs MWL operations, appoints and terminates MWL personnel, provides the MWL with virtually all of its funding, determines how funds will be distributed throughout the world, and otherwise stringently controls the MWL's operations. In many countries, MWL conducts operations from the local Saudi embassy, under the supervision of the embassy's Islamic Affairs Division.

115. Senior officials of the MWL have expressly acknowledged that the MWL and its subsidiary bodies are agencies, instrumentalities and organs of the Kingdom of Saudi Arabia. During court proceedings in *Minister of Citizenship and Immigration v. Mahmoud Jaballah*, Federal Court of Canada, Docket DES-6-99, an immigration proceeding initiated against an employee of the International Islamic Relief Organization based on his sponsorship of terrorist organizations, Arafat El Asahi, the director of the International Islamic Relief Organization in Canada and a full time employee of the Muslim World League, testified as follows:

Let me tell you one thing, the Muslim World League, which is the mother of IIRO, is a fully government funded organization. In other words, I work for the government of Saudi Arabia. I am an employee of that government. Second, the IIRO is the relief branch of that organization which means that we are controlled in all of our activities

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<sup>17</sup> The various offices comprising MWL's international operations, all of which operate under the direction and control of the organization's headquarters, are identified with greater particularity in the More Definite Statement attached hereto as Exhibit 18, which is incorporated herein by reference.

and plans by the government of Saudi Arabia. Keep that in mind, please ... I am paid by my organization which is funded by the [Saudi] government ... the [IIRO] office, like any other office in the world, here or in the Muslim World League, has to abide by the policy of the government of Saudi Arabia. If anybody deviates from that, he would be fired; he would not work at all with IIRO or with the Muslim World League.

116. The MWL has long operated as a fully integrated component of al Qaida's financial and logistical infrastructure, and provided material support and resources to al Qaida and affiliated FTOs.

117. The MWL's close affiliation with Osama bin Laden and other high ranking al Qaida officials dates to the 1980's. During the war against the Soviet occupation of Afghanistan, Abdullah Azzam, bin Laden's spiritual mentor and partner in Makhtab al Kidhmat, headed the office of the MWL in Peshawar, Pakistan, which served as the rear base for mujihadeen operations. That office was thereafter led by Wa'el Julaidan, who also served as Director General and a member of the Board of Trustees of Rabita Trust, a financial arm of the MWL. Wa'el Julaidan is a founding member of al Qaida. On September 6, 2002, the United States Department of Treasury designated Julaidan as a Specially Designated Global Terrorist pursuant to Executive Order 13224. The Treasury Department statement regarding the designation provided as follows:

Wa'el Hamza Julaidan, a Saudi citizen, is an associate of Osama bin Laden. Julaidan fought with bin Laden in Afghanistan in the 1980s. Julaidan is also associated with several individuals and entities linked to al Qaida, including bin Laden's lieutenants, Ayman al Zawahri, Abu Zubaida, and Mohammed Atef; and the organizations: Maktab al Khidmat, the Rabita Trust, and al-Gamma al Islamiya. These individuals and entities have been previously designated under President Bush's Executive Order and by the United Nations.



Bin Laden himself acknowledged close ties to Julaidan during a 1999 interview with al-Jazeera TV. When referring to the assassination of al Qaida co-founder Abdullah Azzam, bin Laden stated that “we were all in one boat, as is known to you, including our brother, Wa’el Julaidan.” Julaidan has established contacts with several known Islamic extremists, including bin Laden’s principal lieutenant, Ayman al-Zawahri. Another bin Laden lieutenant, Abu Zubaida, claimed that he had accompanied Julaidan from Pakistan to Kandahar, Afghanistan during the summer of 2000. Zubaida said that Julaidan met with bin Laden and senior bin Laden lieutenant Mohammed Atef soon after arriving in Kandahar.

In February 2000, Julaidan was appointed to the Board of Trustees of the Rabita Trust and served as its director general. The Rabita Trust is an NGO designated under President Bush’s Executive Order as an organization that provided logistical and financial support to al-Qa’ida.

#### **BASIS FOR DESIGNATION**

The United States has credible information that Wa’el Hamza Julaidan is an associate of Osama bin Laden and several of bin Laden’s top lieutenants. Julaidan has directed organizations that have provided financial and logistical support to al-Qa’ida. Accordingly, the United States is designating Julaidan under Executive Order 13224 as a person who supports terror.<sup>18</sup>

118. From the earliest stages of al Qaida’s development, the MWL has served as a front to conceal the terrorist organization’s existence and true purpose, as confirmed by documents seized throughout the world in conjunction with investigations into al Qaida’s global support infrastructure.

119. An internal al Qaida document seized during the March 2002 search of BIF’s Sarajevo offices, written on the joint letterhead of the MWL and International

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<sup>18</sup> Additional factual allegations relating to Wa’el Julaidan’s material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 19, which is incorporated herein by reference.

Islamic Relief Organization, suggests using the name of the “League” as “an umbrella which you can stay under.”

120. In another letter seized in Bosnia, the MWL suggests the use of “League offices” for launching al Qaida attacks.

121. A separate document recovered during the same raid includes a list of orders from Osama bin Laden regarding the management of Islamic charities. At point 10 of his list, Bin Laden urges the creation of a committee to receive and distribute donations to al Qaida, and suggests the participation of the Saudi Red Crescent, Rabita Trust [MWL] and the Relief Agency.

122. As al Qaida developed and expanded its operations into new geographical regions over the years, the MWL extended its infrastructural support accordingly. While working for the MWL in Kenya, Ihab Ali relayed messages between Osama bin Laden and Wadi El-Hage in connection with the coordination of the bombings of the U.S. embassies in Kenya and Tanzania. El Hage, who was convicted for his role in the embassy bombings, was himself at one time an employee of the MWL.

123. The MWL also provided direct financial assistance to al Qaida members involved in the attempted assassination of Egyptian President Hasni Mubarak in 1995.

124. The MWL further sponsored al Qaida through its participation in the Saudi Joint Relief Committee (SJRC), a body established by the Kingdom of Saudi Arabia to coordinate ostensible relief efforts among several charitable organizations under its control and direction in Kosovo and Chechnya. The other purported charities compromising the SJRC include the International Islamic Relief Organization, Saudi Red Crescent Society, World Assembly of Muslim Youth, al Haramain Foundation, Islamic Endowments and Makk Establishment, among others.

125. The United Nations' mission in Kosovo declared that the SJRC in Pristina, Kosovo served as a cover for several al Qaida operatives, including Adel Muhammad Sadi bin Kazam and Wa'el Hamza Julaidan, both of whom served as directors of SJRC.

126. Between 1998 and 2000, the Kingdom of Saudi Arabia, through SJRC, diverted more than \$74 million to al Qaida members and loyalists affiliated with SJRC bureaus. Throughout this time, the Committee was under the supervision and control of Saudi Interior Minister Prince Naif bin Abdul Aziz.

127. As further detailed herein, the MWL has also provided substantial material support and resources to al Qaida through its subsidiary bodies, including the International Islamic Relief Organization, World Assembly of Muslim Youth, Rabita Trust, Benevolence International Foundation and International Islamic Relief Organization.

128. As the forgoing demonstrates, MWL 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.<sup>19</sup>

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

### **INTERNATIONAL ISLAMIC RELIEF ORGANIZATION (IIRO)**

130. The International Islamic Relief Organization (IIRO) is a subsidiary body of the MWL, with offices throughout the globe.<sup>20</sup> According to MWL officials, the MWL provides "humanitarian assistance" through the arms of IIRO.

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<sup>19</sup> Additional factual allegations relating to MWL's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 19, which is incorporated herein by reference.

<sup>20</sup> The various offices comprising IIRO's international operations, all of which operate under the direction and control of the organization's headquarters, are identified with greater particularity in the More Definite Statement attached hereto as Exhibit 18, which is incorporated herein by reference.

131. Like the MWL, the IIRO is an agency, instrumentality and organ of the Kingdom of Saudi Arabia. The Kingdom controls and directs IIRO operations, appoints and terminates IIRO personnel, provides the IIRO with virtually all of its funding, determines how funds will be distributed throughout the world, and otherwise stringently controls the IIRO's operations. In many countries, IIRO conducts operations from the local Saudi embassy, under the supervision of the embassy's Islamic Affairs Division.

132. As set forth previously, senior officials of the IIRO have expressly acknowledged that the IIRO and the other subsidiary bodies of the MWL are agencies, instrumentalities and organs of the Kingdom of Saudi Arabia.

133. The IIRO has long operated as a fully integrated component of al Qaida's logistical and financial support infrastructure, and provided material support and resources to al Qaida and affiliated FTOs.

134. According to the recently declassified 1996 CIA report regarding the involvement of Islamic charities in the sponsorship of terrorism, the IIRO funded six al Qaida training camps in Afghanistan, including camps from which al Qaida planned, approved and coordinated the September 11<sup>th</sup> Attack, and at which some or all of the September 11 hijackers received indoctrination and training.

135. Outside of Afghanistan, the IIRO has used its branch offices throughout the world to facilitate al Qaida's activities. According to the December 2, 2003 report of the United Nations Security Council Committee Concerning al Qaida and the Taliban, the Philippine branch of the IIRO served as the coordinating center for Islamic extremists in the Far East throughout the 1990's, and channeled funds to the Abu Sayyaf group, a terrorist organization operating under the al Qaida umbrella.

136. The IIRO office in the Philippines was established and run by Mohammed Jamal Khalifa, the brother-in-law of Osama bin Laden. According to the U.S. government, Khalifa and the Philippine office of the IIRO participated in the planning of al Qaida's plots to kill the Pope during a planned January, 1995 visit to the Philippines and to simultaneously attack multiple U.S. airliners while in flight. The plot to target U.S. airliners developed by the Philippine office of the IIRO served as the inspiration and foundation for the September 11<sup>th</sup> Attack.

137. American law enforcement officials detained Khalifa on December 16, 1994, as he was returning to the Philippines from San Francisco, California. Traveling with Khalifa at the time of his detention was Mohamed Loay Bayazid, an al Qaida founding member and top official. Investigators discovered documents in Khalifa's possession referring to the plot to kill the Pope and church bombings carried out by al Qaida the prior year.

138. In 1993, officials linked members of the Zagreb office of the IIRO to an Islamic extremist group headed by Muhammad Sa'd Darwish Al-Shazy, which was planning to conduct anti-Jewish bombings in Croatia. In addition to representatives of IIRO, Al-Shazy's organization included the heads of the Zagreb offices of the Saudi High Commission and the Kuwaiti Joint Relief Committee, representatives of the Human Relief International and members of the Qatar Charitable Society.

139. Through its offices in Kenya, the IIRO provided direct financial and logistical support to al Qaida terrorists involved in the 1998 bombings of the United States Embassies in Dar Es Salam, Tanzania and Nairobi, Kenya. As a result of an investigation into the involvement of the IIRO in the bombings, Kenyan officials deregistered the IIRO's Nairobi office.

140. According to the Indian government, IIRO officials were behind the 1999 al Qaida plot to attack the U.S. consulates in Madras and Calcutta, in response to the American military retaliation for the African embassy bombings.

141. The operational cell designated to carry out the planned attacks on the U.S. consulates was led by Sayed Abu Nesir, a Bangladeshi national who was directed to launch the attacks by Shaykh Ahmed al-Gamdin, Director of IIRO operations in Asia.

142. During subsequent interrogation, Abu Nesir declared that 40 to 50% of IIRO's charitable funds were being diverted to finance terrorist training camps in Afghanistan and Kashmir. Among other duties, Abu Nesir visited the training camps on behalf of IIRO to assess their funding needs. At the direction of al-Gamdin, Nesir himself attended one of the al Qaida camps to receive training, where he met Osama bin Laden.

143. IIRO's Bosnia office has been directly involved in al Qaida operations as well. One of the heads of that office, Abdel Aziz Zaher, was expelled from his residence in Belgrade in early 1993 after officials linked him to terrorist activity in the region. Zaher was also affiliated with the MWL and Sanabil Relief Agency. Zaher's top lieutenant at IIRO, Jamal Al-Jibouri, was personally responsible for oversight of a massive logistical operation to provide al Qaida and al Qaida affiliated Islamic militants in the Balkans with weapons and ammunition.

144. In October 2001, Pakistani officials identified and expelled some two dozen al Qaida members who had been working for the IIRO in Pakistan.

145. Mahmoud Jaballah, head of IIRO's Canadian office, was arrested and jailed by Canadian officials based on his links to al Qaida and al Jihad.

146. In 1991, the IIRO established a US branch in Virginia, under the name International Relief Organization, Inc. (IRO). The IRO operated from offices at 360 South Washington Street, Washington, DC, where it shared office space with the MWL. The Washington, DC offices of the IIRO and MWL were part of a complicated web of for-profit and ostensible charitable organizations within the United States, commonly known as the SAAR Network, the majority of which maintained offices at 555 Gross Street, Herndon, VA. The SAAR Network of businesses and charities was created to provide funding, money laundering and other material support to terrorist organizations, including al Qaida. In March of 2003, federal authorities executed search warrants at the offices of IIRO in Washington, DC, in connection with an ongoing federal investigation of the illegal activities of the Northern Virginia and Washington based charities and for-profit enterprises within the SAAR Network. Through that investigation, the details of which are further discussed herein, federal authorities determined that the IIRO and MWL offices in Washington, DC provided funding and material support to al Qaida and Hamas.

147. The IIRO further sponsored al Qaida through its participation in the Saudi Joint Relief Committee. As set forth previously, the SJRC offices in Pristine, Kosovo served as a cover for al Qaida operatives. Furthermore, between 1998 and 2000, the Kingdom of Saudi Arabia, through SJRC, diverted more than \$74 million to al Qaida members and loyalists affiliated with SJRC bureaus.

148. As the forgoing demonstrates, IIRO 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.<sup>21</sup>

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<sup>21</sup> Additional factual allegations relating to IIRO's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 19, which is incorporated herein by reference.

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

### **WORLD ASSEMBLY OF MUSLIM YOUTH**

150. World Assembly of Muslim Youth (WAMY) is a subsidiary body of the MWL, with more than 60 offices throughout the world.<sup>22</sup>

151. Like the MWL, WAMY is an agency, instrumentality and organ of the Kingdom of Saudi Arabia. The Kingdom controls and directs WAMY operations, appoints and terminates WAMY personnel, provides WAMY with virtually all of its funding, determines how funds will be distributed throughout the world, and otherwise stringently controls WAMY's operations. In many countries, WAMY conducts operations from the local Saudi embassy, under the supervision of the embassy's Islamic Affairs Division.

152. As set forth previously, senior officials of the MWL have expressly acknowledged that the MWL and its subsidiary bodies are agencies, instrumentalities and organs of the Kingdom of Saudi Arabia.

153. WAMY has long acted as a fully integrated component of al Qaida's financial and logistical infrastructure, and provided material support and resources to al Qaida and affiliated FTOs.

154. Through its offices in Peshawar, Pakistan, WAMY has provided extensive support to al Qaida operatives, Afghan warlords and al Qaida affiliated Kashmiri terrorists. In November 2001, Pakistani intelligence officials, operating in conjunction with the Federal Bureau of Investigation, raided WAMY's Peshawar, Pakistan offices,

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<sup>22</sup> The various offices comprising WAMY's international operations, all of which operate under the direction and control of the organization's headquarters, are identified with greater particularity in the More Definite Statement attached hereto as Exhibit 18, which is incorporated herein by reference.



based on its suspected ties to al Qaida militants. The close relationship between that WAMY office and al Qaida was vividly confirmed shortly after the search, when an employee of the office hand-delivered a recorded message from Osama bin Laden to the local media.

155. According to Indian officials, Nazir Qureshi, an Assistant Secretary General of WAMY, has supplied money and other assets to Khasmiri terrorist groups associated with al Qaida.

156. Mohammed Ayyub Thukar, President of the World Khasmir Freedom Movement and a principal financier of the al Qaida affiliated Hizbul Mujihadeen, served as a WAMY official during exile in Saudi Arabia.

157. WAMY has provided military training to prospective jihadists, and members of the organization have fought under Gulbadin Hekmatyar's Hizb e Islami in Afghanistan. On February 19, 2003, the United States government designated Hekmatyar pursuant to Executive Order 13224, based on his affiliation with al Qaida.

158. Philippine authorities are currently investigating links between WAMY's offices in the Far East and al Qaida operations in the region.

159. WAMY also has served as a distribution channel for training documentation between the al Qaida leadership in Afghanistan and operational cells throughout the world. When he was arrested in 1992, Ahmed Ajaj, who was subsequently convicted for his role in the 1993 World Trade Center bombing, had in his possession an al Qaida Manual entitled "*Military Lessons In The Jihad Against The Tyrants*" which detailed how to establish and maintain clandestine operational sales. The manual was distributed to Ajaj by WAMY. The same manual was subsequently

recovered from the London apartment of African embassy bomber Khalid al-Fawwaz in 1998.

160. In 1992, Abdullah Bin Laden, Osama bin Laden's brother, established a WAMY office within the United States, in Falls Church, Virginia. At least through 1998, Abdullah Bin Laden served as the president of WAMY's U.S. operations. WAMY's U.S. office was part of the SAAR Network of businesses and charities created to provide funding, money laundering and other material support to terrorist organizations, including al Qaida. WAMY's U.S. operations were raided by federal authorities in conjunction with the ongoing investigation of the SAAR Network's material sponsorship of al Qaida and affiliated FTOs.

161. WAMY also has provided financial support to the U.S. based Council on American Islamic Relations (CAIR), a civil rights organization which received its initial seed money from the Holy Land Foundation for Relief and Development. On December 4, 2001, the Treasury Department listed Holy Land Foundation for Relief and Development as a specially designed terrorist pursuant to Executive Order 13224.

162. WAMY has also supported al Qaida affiliated extremists through its participation in the Islamic Coordination Council, an umbrella organization established in Peshawar, Pakistan in 1985 to coordinate and maximize the funding of the mujihadeen in Afghanistan. Other members of the ICC included IIRO, Saudi Red Crescent and Qatar Charitable Society. Following the withdrawal of Soviet forces from Afghanistan, the ICC continued to sponsor mujhadeen elements which joined Osama Bin Laden's al Qaida.

163. WAMY further sponsored al Qaida through its participation in the SJRC. As set forth previously, the SJRC offices in Pristine, Kosovo served as a cover for al

Qaida operatives. Furthermore, between 1998 and 2000, the Kingdom of Saudi Arabia, through SJRC, diverted more than \$74 million to al Qaida members and loyalists affiliated with SJRC bureaus.

164. WAMY is closely affiliated with defendant BIF. In fact, WAMY and BIF shared a common address in Peshawar, Pakistan, and frequently shared common officers and directors. As outlined in further detail herein, BIF long has provided material support and resources to al Qaida.

165. As the forgoing demonstrates, WAMY 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.<sup>23</sup>

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

#### **AL HARAMAIN ISLAMIC FOUNDATION**

167. Defendant al Haramain Islamic Foundation (al Haramain) is a Saudi Arabia-based ostensible charity, with branch offices in approximately 49 countries.<sup>24</sup>

168. Al Haramain is an agency, instrumentality and organ of the Kingdom of Saudi Arabia. The Kingdom controls and directs al Haramain operations, appoints and terminates al Haramain personnel, provides al Haramain with virtually all of its funding, determines how funds will be distributed throughout the world, and otherwise stringently controls al Haramain's operations. In many countries, al Haramain conducts operations

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<sup>23</sup> Additional factual allegations relating to WAMY's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 20, which is incorporated herein by reference.

<sup>24</sup> The various offices comprising al Haramain's international operations, all of which operate under the direction and control of the organization's headquarters, are identified with greater particularity in the More Definite Statement attached hereto as Exhibit 18, which is incorporated herein by reference.

from the local Saudi embassy, under the supervision of the embassy's Islamic Affairs Division.

169. Al Haramain officials have acknowledged that their operations are under the control and direction of the Kingdom of Saudi Arabia. According to al Haramain's general director, Sheik Aqeel al-Aqeel, "we work under the supervision of Saudi government." Al-Aqeel has also acknowledged that more than 95% of al Haramain's funding comes directly from the Kingdom of Saudi Arabia. In an August 25, 2002 report posted on al Haramain's website, the Chairman of the Africa Committee of al Haramain, al-Sheikh Muhmad al Tujri, declared that al Haramain's activities in Kenya were under the "direct supervision" of the Saudi embassy in that country. A separate report on al Haramain's website that month indicated that the Saudi Interior Minister had directed the organization to provide assistance to Afghani refugees.

170. Al Haramain has long acted as a fully integrated component of al Qaida's logistical and financial support infrastructure, and provided material support and resources to al Qaida and affiliated FTOs.

171. International investigations have confirmed al Haramain's direct complicity in al Qaida's operations and attacks throughout the world. On March 11, 2002, the United States designated the Bosnia and Herzegovina branches of al Haramain, based on their extensive and pervasive involvement in the funding of al Qaida's activities in those two countries. In describing the close links between the two al Haramain offices and terrorist activity, the United Nations Security Council Committee Concerning al Qaida and the Taliban succinctly stated as follows:

The Somalia and Bosnia branches had been directly implicated in al Qaida funding activities. Al Haramain Somalia had funneled money to al-Ittihad al-Islami, a designated terrorist group, by disguising the funds as

contributions for an orphanage project and for Islamic School and Mosque construction. The Bosnia office was linked to al-Jemaah al-Islamiyah, al-Masriyah and to Osama Bin Laden.

172. On January 22, 2004, the United States designated the al Haramain branches in Indonesia, Kenya, Tanzania and Pakistan as well. The Indonesian Office of al Haramain had diverted funds to al Qaida affiliated terrorists for weapons procurement, and directly funded the deadly October 12, 2002 Bali nightclub bombing. According to Omar al-Faruq, a senior al Qaida official apprehended in Southeast Asia, al Haramain served as a primary source of al Qaida funding throughout Southeast Asia.

173. In the press release issued in conjunction with the designation of the Kenyan and Tanzanian offices of al Qaida, the Treasury Department described al Haramain's extensive involvement in terrorist activity within Africa as follows:

- As early as 1997, U.S. and other friendly authorities were informed that the Kenyan branch of AHF was involved in plotting terrorist attacks against Americans. As a result, a number of individuals connected to AHF in Kenya were arrested and later deported by Kenyan authorities.
- In August 1997, an AHF employee indicated that the planned attack against the U.S. Embassy in Nairobi would be a suicide bombing carried out by crashing a vehicle into the gate of the Embassy. A wealthy AHF official outside East Africa agreed to provide the necessary funds. Information available to the U.S. shows that AHF was used as a cover for another organization whose priorities include dislike for the U.S. government's alleged anti-Muslim stance and purposed [sic] U.S. support for Christian movements fighting Islamic countries.
- Also in 1997, AHF senior activities in Nairobi decided to alter their (then) previous plans to bomb the U.S. Embassy in Nairobi and instead sought to attempt the assassination of U.S. citizens. During this time period, an AHF official indicated he had obtained five hand grenades and seven "bazookas" from a source in Somalia. According to the information available to the U.S., these weapons were to be used in a possible assassination attempt against a U.S. official.
- Information available to the U.S. shows that a former Tanzania AHF director was believed to be associated with UBL [Usama Bin Laden] and was responsible for making preparations for the advance party that planned the August 7, 1998 bombings of the U.S. Embassies in Dar Es Salaam, Tanzania, and Nairobi, Kenya. As a result of these attacks, 224 people were killed.

- Shortly before the dual-Embassy bombing attacks in Kenya and Tanzania, a former AHF official in Tanzania met with another conspirator to the attacks and cautioned the individual against disclosing knowledge of preparations for the attacks. Around the same time, four individuals led by an AHF official were arrested in Europe. At that time, they admitted maintaining close ties with EIJ and Gamma Islamiyah.
- Wadih-El-Hage, a leader of the East African al Qaida cell and personal secretary to UBL [Osama Bin Laden], visited the Kenya offices of AHF before the 1998 dual Embassy attacks. Searches conducted by authorities revealed that El-Hage possessed contact information for a senior AHF official who was head of AHF's Africa Committee, then overseeing authority for AHF's offices in Kenya and Tanzania.
- In early 2003, individuals affiliated with AHF in Tanzania discussed the status of plans for an attack against several hotels in Zanzibar. The scheduled attacks did not take place due to increased security by local authorities, but planning for the attacks remained active.
- Information made available to the U.S. shows that AHF offices in Kenya and Tanzania provided support, or act for or on behalf of al Qaida and AIM.

174. The Pakistan office of al Haramain provided funding and logistical support for the acquisition and delivery of Zenit missiles, Sting anti-aircraft missiles, and hand-held anti-tank weapons to al Qaida and al Qaida affiliated militants. In addition, the Pakistan office was closely associated with Makhtab al-Khidmat, the organization co-founded by Osama Bin Laden to support the Jihad against the Soviets in Afghanistan. In 2000, the Director of Makhtab al-Khidmat instructed that funds be deposited into al Haramain accounts in Pakistan, and from there transferred to other accounts.

175. Al Haramain has also sponsored al Qaida activity within Europe, through the al Nur Mosque. According to German officials, the al Nur Mosque served as a meeting place, recruitment center and base of operations for al Qaida within Germany. At the direction of the Kingdom of Saudi Arabia, al Haramain contributed in excess of \$1 million dollars to the Mosque, funding the purchase of the land for the Mosque as well as its construction.

176. Al Haramain also sponsored al Qaida operations in Chechnya and Kosovo through its participation in the Saudi Joint Relief Committee. As set forth previously, the

SJRC offices in Pristine, Kosovo served as a cover for al Qaida operatives. Furthermore, between 1998 and 2000, the Kingdom of Saudi Arabia, through SJRC, diverted more than \$74 million to al Qaida members and loyalists affiliated with SJRC bureaus.

177. On February 19, 2004, in conjunction with its ongoing investigation of Al Haramain's extensive involvement in al Qaida's global operations, federal officials executed a search warrant against property purchased on behalf of Al Haramain in the United States, located in Ashland, Oregon. The search was conducted pursuant to a criminal investigation into violations of the Internal Revenue Code, Money Laundering Control Act and Bank Secrecy Act.

178. As the forgoing demonstrates, al Haramain 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.<sup>25</sup>

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

### **SAUDI HIGH COMMISSION**

180. The Saudi High Commission is a Saudi Arabia-based charity, established by Prince Slaman bin Abdul Aziz al Saud.

181. The Saudi High Commission is an agency, instrumentality and organ of the Kingdom of Saudi Arabia. The Kingdom controls and directs Saudi High Commission operations, appoints and terminates Saudi High Commission personnel, provides the Saudi High Commission with virtually all of its funding, determines how funds will be distributed throughout the world, and otherwise stringently controls the

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<sup>25</sup> Additional factual allegations relating to the material sponsorship of al Qaida by al Haramain and al Haramain officials, including Perouz Sedaghaty, are set forth in the RICO Statement attached hereto as Exhibit 21, which is incorporated herein by reference.

Saudi High Commission's operation. In many countries, the Saudi High Commission conducts operations from the local Saudi embassy, under the supervision of the embassy's Islamic Affairs Division.

182. The Saudi High Commission has long acted as a fully integrated component of al Qaida's logistical and financial support infrastructure, and provided material support and resources to al Qaida and affiliated FTOs.

183. According to Bosnian officials, al Qaida mujihadeen fighters began entering Bosnia-Herzegovina in 1992, frequently disguised as relief workers for the Saudi High Commission.

184. For the next ten years, the Saudi High Commission funneled millions of dollars to al Qaida operations in Bosnia. To this date, investigators have been unable to account for approximately \$41 million donated to the charity.

185. In September 2000, Prince Salman received a letter from a Bosnian association called the "Mothers of Srebrenica and Podrinje" advising Prince Salman that funds donated to the Saudi High Commission were being improperly diverted.

186. In October 2001, officials of the U.S. government raided the Sarajevo offices of the Saudi High Commission. During the raid, investigators found computer hard drives with photographs of the World Trade Center before and after its collapse, as well as photographs of the United States embassies in Kenya and Tanzania and the U.S.S. Cole. Investigators also discovered files on pesticides and crop dusters, information about how to make fake state department badges, and photographs and maps of Washington, marking prominent government buildings.



187. Following the raid, the Financial Police of the Federation of Bosnia Herzegovina Ministry of Finance described the Saudi High Commission as a front for radical and terrorism-related activities, stating:

Members of the SFOR (stabilization forces) have on premises on the Saudi high commission relief for Bosnia and Herzegovina confiscated some documentation for which it can be claimed with certainty that it does not belong in the scope of work of a humanitarian organization  
...

188. As the forgoing demonstrates, the Saudi High Commission 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.<sup>26</sup>

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

### **SAUDI RED CRESCENT SOCIETY**

190. The Saudi Red Crescent Society (Saudi Red Crescent) is a Saudi Arabia-based ostensible charity, which conducts operations throughout the world.

191. The Saudi Red Crescent is an agency, instrumentality and organ of the Kingdom of Saudi Arabia. The Kingdom controls and directs Saudi Red Crescent operations, appoints and terminates Saudi Red Crescent personnel, provides the Saudi Red Crescent with virtually all of its funding, determines how funds will be distributed throughout the world, and otherwise stringently controls the Saudi Red Crescent's operation. In many countries, the Saudi Red Crescent conducts operations from the local Saudi embassy, under the supervision of the embassy's Islamic Affairs Division.

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<sup>26</sup> Additional factual allegations relating to the Saudi High Commission's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 22, which is incorporated herein by reference.

192. The Saudi Red Crescent has long acted as a fully integrated component of al Qaida's logistical and financial support infrastructure, and provided material support and resources to al Qaida and affiliated FTOs.

193. Throughout the 1980's the Saudi Red Crescent provided extensive financial and logistical support to the mujihadeen in Afghanistan. During this time, the Saudi Red Crescent was populated and run by Islamic militants who would become the future founders of al Qaida. Indeed, Wa'el Julaidan served as an officer of the Saudi Red Crescent for many years, and continued to fill that role following the establishment of al Qaida. Ayman-Zawahiri, al Qaida's second in command, joined the Saudi Red Crescent in 1985. In 1995, he presented himself as a representative of the Saudi Red Crescent and raised \$500,000 in the San Francisco area.

194. Following the withdrawal of Soviet troops from Afghanistan, the Saudi Red Crescent redirected its efforts towards the fulfillment of the objectives of the newly established al Qaida movement.

195. The Saudi Red Crescent's integral role in the growth and development of the nascent al Qaida movement has been confirmed by documents seized in Bosnia and Herzegovina, during the searches of the BIF's offices. As set forth previously, during those searches, investigators recovered a list of orders from Osama Bin Laden regarding the management of Islamic charities. On point 10 of his list, Bin Laden urges the creation of a committee to receive and distribute donations to al Qaida, and suggests the participation of the Saudi Red Crescent, Rabita Trust and the Relief Agency.

196. During that same search, investigators found a letter on Saudi Red Crescent stationary to Abu Rida, another founding member of al Qaida, requesting that

“weapons be inventoried.” At the bottom of the letter is a note from Osama Bin Laden to Wa’el Julaidan stating that al Qaida has an extreme need for weapons.

197. Saudi Red Crescent employees have repeatedly been implicated in al Qaida attacks and plots. In 1996, two Sudanese members of the Saudi Red Crescent, Muhammed Ali Syad and Bashir Babar Quadim, were arrested in connection with the 1995 Egyptian Embassy bombing in Pakistan.

198. In 2001, two administrators for the Saudi Red Crescent in Bosnia, Boumediene Lakhdar and Nechle Mohammed, were arrested for plotting terrorist attacks against the U.S. and British Embassies in Sarajevo.

199. In October of 2001, Pakistan deported several dozen representatives of the Saudi Red Crescent, after confirming their affiliation with al Qaida.

200. The Saudi Red Crescent further sponsored al Qaida through its participation in the SJRC. As set forth previously, the SJRC offices in Pristine, Kosovo served as a cover for al Qaida operatives. Furthermore, between 1998 and 2000, the Kingdom of Saudi Arabia, through SJRC, diverted more than \$74 million to al Qaida members and loyalists affiliated with SJRC bureaus.

201. As the forgoing demonstrates, Saudi Red Crescent 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.<sup>27</sup>

202. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of Saudi Red Crescent’s participation in al Qaida’s jihadist campaign.

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<sup>27</sup> Additional factual allegations relating to the material sponsorship of al Qaida by the Saudi Red Crescent and its Director Dr. Abdul Rahman al Swailem are set forth in the Amended RICO Statement attached hereto as Exhibit 23, which is incorporated herein by reference.

## **SAUDI JOINT RELIEF COMMITTEE FOR KOSOVO AND CHECHNYA**

203. As set forth previously, the Saudi Joint Relief Committee (SJRC) is a body established by the Kingdom of Saudi Arabia to coordinate ostensible relief efforts among several charitable organizations under its control and direction in Kosovo and Chechnya. The purported charities comprising the SJRC include the IIRO, Saudi Red Crest Society, WAMY, al Haramain Foundation, and Islamic Endowments and Makk Establishment, among others.

204. Between 1998 and 2000, the Kingdom of Saudi Arabia, through SJRC, diverted more than \$74 million dollars to al-Qaida members and loyalists affiliated with SJRC bureaus. Throughout this time, the committee was under the supervision and control of Saudi Interior Minister Prince Naif Bin Abdul Aziz.

205. The United Nation's mission in Kosovo has declared that the SJRC office in Pristina, Kosovo, served as a cover for several al-Qaida operatives, including Adel Muhammad Sadi Bin Kazam and Wa'el Hamza Julaidan, both of whom served as Directors of SJRC.

206. As the forgoing demonstrates, SJRC 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>28</sup>

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

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<sup>28</sup> Additional factual allegations relating to SJRC's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 24, which is incorporated herein by reference.

## **RABITA TRUST**

208. Defendant Rabita Trust is a subsidiary body of the MWL, with headquarters in Lahore, Pakistan and offices throughout the world. Rabita Trust is an agency, instrumentality and organ of the Kingdom of Saudi Arabia. The Kingdom controls and directs Rabita Trust operations, appoints and terminates Rabita Trust personnel, provides Rabita Trust with virtual all of its funding, determines how funds will be distributed throughout the world, and otherwise stringently controls Rabita Trust operations. In many countries, Rabita Trust conducts operations from the local Saudi embassy, under the supervision of the embassy's Islamic Affairs Division.

209. As set forth previously, senior officials of the MWL have expressly acknowledged that the MWL and its subsidiary bodies are agencies, instrumentalities and organs of the Kingdom of Saudi Arabia.

210. Rabita Trust has long acted as a fully integrated component of al Qaida's logistical and financial support infrastructure, and provided material support and resources to al Qaida and affiliated FTOs.

211. Rabita Trust's direct participation in al Qaida's operations dates to the establishment of Bin Laden's terrorist movement, as confirmed by the internal al Qaida document recovered from BIF's computer files in which Osama bin Laden suggests Rabita Trust's involvement in a committee to collect and distribute funds to al Qaida.

212. Rabita Trust's material sponsorship of al Qaida has been facilitated by the direct participation of senior al Qaida officials in the management and operation of Rabita Trust. In fact, Rabita Trust was, for several years prior to September 11, 2001, headed by al Qaida founding member Wa'el Hanza Julaidan.

213. In addition, Rabita Trust has shared common officers and directors with several other charities operating within al-Qaida's infrastructure, including the MWL and SAAR Network of charities and businesses. Abdullah Omar Naseef served as a Chairman of Rabita Trust and as Secretary General of the MWL. Naseef is also an Officer of Makkahl-Mukarramah, Inc., a Virginia based charity operating within the SAAR network. The Vice Chairman of the Board of Trustees of Rabita Trust, Abdullah al-Obaid, also served as an Officer of the MWL and Sanabell al-Kheer organizations within the SAAR network. Al-Obaid also serves as a Senior Executive of al-Watania Poultry in Saudi Arabia, one of the many businesses owned by Suleiman Abdel Aziz al-Rajhi, the founder of the SAAR Network, member of the Board of Directors of IIRO, CEO of al Rajhi Banking and Investment and a defendant herein.<sup>29</sup>

214. Given its pervasive and ongoing involvement in al-Qaida's operations, and the direct participation of senior al Qaida officials in its management, the United States government designated Rabita Trust as a Specially Designated Global Terrorist on October 12, 2001 pursuant to Executive Order 13224.

215. As the forgoing demonstrates, Rabita Trust 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.<sup>30</sup>

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

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<sup>29</sup> Additional factual allegations relating to Abdullah al-Obaid's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 25, which is incorporated herein by reference.

<sup>30</sup> Additional factual allegations relating to Rabita Trust's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 19, which is incorporated herein by reference.

## **GLOBAL RELIEF FOUNDATION**

217. Defendant Global Relief Foundation is an ostensible charity organized under the law of Illinois in 1992.

218. On October 18, 2002, the United States government designated Global Relief Foundation under the authority of Executive Order 13224. Prior to that designation and the consequent blocking of its assets, Global Relief Foundation had long-acted as a fully integrated component of al-Qaida's logistical and financial support infrastructure, and provided material support and resources to al-Qaida and affiliated FTOs.

219. In the press release issued in conjunction with the designation of Global Relief Foundation, the Treasury Department described Global Relief Foundation extensive and long-term involvement in furthering the objectives of the al-Qaida movement as follows:

### **TREASURY DEPARTMENT FACT SHEET ON THE GLOBAL RELIEF FOUNDATION**

The Global Relief Foundation (GRF), also known as Fondation Secores Mondial (FSM), and its officers and directors have connections to, and have provided support for and assistance to, Usama Bin Laden (UBL), al Qaida, and other known terrorist groups. These includes groups previously designated by the United States under President Bush's September 2001 Executive Order 13224 regarding terrorism and included on the United Nation's 1267 Sanctions Committee's consolidated list of individuals and entities whose assets are required to be frozen pursuant to UN Security Council Resolutions (UNSCRs) 1267 and 1390.

Links to UBL and al-Qaida:

Rabih Hadad, a senior GRF official who co-founded GRF and served as its President throughout the 1990s and in the year 2000, worked for Makhtab al-Khidamat (MAK) in

Pakistan in the early 1990s. MAK was co-founded by Sheik Abdullah Azzam and UBL in the 1980s and served as the precursor organization to al Qaida. MAK was designated by President Bush in E.O. 13224 and was subsequently included on the UN 1267 Sanctions Committee's consolidated list. The organization has helped funnel fighters and money to the Afghan resistance in Peshuwar, Pakistan, and establish recruitment centers worldwide to fight the soviets. Azzam, who served as a mentor to UBL, was killed in 1989. He is also regarded as a historical leader of HAMAS, which was designated under E.O. 13224. At a recent immigration hearing, Haddad conceded that he met Azzam in Pakistan and characterized him as a "hero."

In addition, GRF has provided financial and other assistance to, and received funding from, individuals associated with al Qaida. Mohammad Galeb Kalaje Zouaydi, a suspected financier of al Qaida's worldwide terrorist efforts, was arrested in Europe in April 2002. GRF has admitted receiving funds from Zouaydi.

GRF and FSM personnel had multiple contacts with Wadih El-Hage, UBL's personnel secretary when UBL was in Sudan. El-Hage was convicted in a U.S. District Court in May 2001, for his role in the UBL-directed 1998 bombings of the U.S. embassies in Kenya and Tanzania. At the time that El-Hage was playing an active role in an al-Qaida terrorist cell in Kenya, he was in contact with GRF. For example, documents recovered from a search in Kenya indicated that El-Hage was in contact with GRF after he returned from visiting al Qaida leadership in Afghanistan in February 1997. GRF has acknowledged that El-Hage and Nabil Sayadi, FSM's director in Belgium, were in contact during this period.

#### Links to Taliban and Other Entities and Background:

A GRF employee also dealt with officials of the Taliban, which at the time was an entity subject to U.S. Sanctions pursuant to United States E.O. 13129 (prohibiting trade and most transactions with the Taliban because it provided a safe haven and base of operations for UBL and al-Qaida) and subject to international sanctions pursuant to UNSCs 1267 and 1333. In November 2001, during the air strikes in Afghanistan, a GRF medical relief coordinator traveled to Kabul, against the advice of the U.S. Department of



State, and engaged in dealings and negotiations with Taliban officials until the collapse of the Taliban regime.

A set of photographs and negatives discovered in 1997 in a trash dumpster outside of GRF's office in Illinois depict large shipping boxes displayed under a GRF banner. The boxes were full of sophisticated communications equipment, including approximately 200 handheld radio transceivers, long-range radio antennas, and portable power packs, with an estimated total value of \$120,000. Other photographs depict fighters armed with automatic rifles, a sandbagged bunker with a radio antenna mounted outside, and mutilated corpses with the name "KPI" (Kashmir Press International) printed alongside. Yet another photograph displays two dead men with the caption "Hizbul Mujahideen," a known terrorist organization operating in the Kashmir region. On the reverse side of the photograph was handwritten in Arabic, "two martyrs killed by the Indian government."

GRF has stocked and promoted audiotapes and books authored by Sheik Abdullah Azzam, discussed above, which glorify armed jihad, including "The international conspiracy against Jihad" and "The Jihad in its present stage." Despite Azzam's terrorist background, GRF has enthusiastically promoted Azzam's materials to the public: "His [Azzam's] theology is a sea, his words are jewels, and his thoughts are a light for those who are holding the smoldering embers. He lived the Jihad experiences of the 20<sup>th</sup> century in Afghanistan... and Palestine, and produced a new theory for saving the [Islamic] nation from disgrace, shame, weakness, and submission to others."

GRF has published several Arabic newsletters and pamphlets that advocate armed action through jihad against groups perceived to be un-Islamic. For example, one 1995 GRF pamphlet reads, "God equated martyrdom through JIHAD was supplying funds for the JIHAD effort. All contributions should be mailed to: GRF." Another GRF newsletter requested donations "for God's cause – they [the Zakat funds] are disbursed for equipping the raiders, for the purchase of ammunition and food, and for their [the Mujahideen's] transportation so that they can raise God the Almighty's word... it is likely that the most important of disbursement of Zakat in our times is on the jihad for God's cause..."

GRF received \$8,521.00 from The Holy Land Foundation for Relief and Development (HLF) in 2000. HLF, a Dallas, Texas base Islamic charitable organization, was designated under E.O. 13224 on December 4, 2001, and under the European Union's regulation (EC) No. 2580/2001 on June 17, 2002, for its ties to terrorism. HLF's designation was upheld in a recent decision by a U.S. District Court.

220. As the forgoing demonstrates, Global Relief Foundation 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.

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

### **THE SAAR NETWORK**

222. Beginning in the 1980s, several prominent and wealthy sponsors of al Qaida's global jihad began establishing a network of interrelated ostensible charities, think tanks and for-profit businesses within the United States, commonly referred to as the "SAAR Network," to generate and surreptitiously transfer funds to terrorist organizations, including al-Qaida.<sup>31</sup>

223. Many of the organizations within the SAAR Network were established and funded by, or closely affiliated with, defendant Suleiman Abdul Aziz al Rajhi, including SAAR Foundation, SAAR International, Safa Group, Mar-Jac Poultry, Mar-Jac Holdings, Inc., Safa Trust, Inc. and Aradi, Inc.

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<sup>31</sup> Additional factual allegations relating to the material sponsorship of al Qaida by SAAR Network executives Taha Al-Awani, M. Omar Ashraf, Iqbal Yunus, Muhammad Ashraf, M. Yaqub Mirza and Dr. Jamal Barzinji are set forth in the RICO Statement attached hereto as Exhibit 26, which is incorporated herein by reference. Additional factual allegations relating to the material sponsorship of al Qaida by SAAR Network executive Sherif Sedky are set forth in the RICO Statement attached hereto as Exhibit 27, which is incorporated herein by reference. Additional factual allegations relating to the material sponsorship of al Qaida by SAAR Network executives Ahmad Totonji and Mohammed Jaghlit are set forth in the RICO Statement attached hereto as Exhibit 28, which is incorporated herein by reference.

224. By September 11, 2001, more than one hundred ostensible charities and for-profit businesses functioned under the umbrella of the SAAR Network, including the U.S. branches of the MWL, IIRO and WAMY. Other organizations operating within the SAAR Network included defendants African Muslim Agency, Grove Corporate, Inc., Heritage Education Trust, International Institute of Islamic Thought, Mar-Jac Investment, Inc., Mena Corporation, Reston Investments, Inc., Sterling Charitable Gift Fund, Sterling Management Group, Inc., Success Foundation and York Foundation.<sup>32</sup>

225. Many of the organizations operating within the SAAR Network are related by common management and parent/subsidiary relationships. The vast majority of the entities within the Network maintained no physical presence at their purported principal place of business.

226. The entities operating within the SAAR Network have long acted as fully integrated components of al Qaida's logistical and financial support infrastructure, and provided material support and resources to al Qaida and affiliated FTOs.

227. On March 20 and 21, 2002, federal authorities raided the offices of the SAAR Network entities, the vast majority of which were located at a single address in Herndon, Virginia, as well as the residences of several prominent SAAR Network officials, pursuant to a search warrant issued by the United States District Court for the Eastern District of Virginia.

228. The ongoing investigation of the SAAR network entities, which prompted the March 2002 searches, has revealed that SAAR entities' funds have been transferred to

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<sup>32</sup> Additional factual allegations relating to the material sponsorship of al Qaida by the SAAR Network, including SAAR Network entities Mar-Jac Poultry, Grove Corporate, International Institute of Islamic Thought, Mena Corporation, Safa Trust, Sterling Management Group, Inc., African Muslim Agency, Heritage Trust, Mar-Jac Investments, Reston Investments, Sterling Charitable Gift Fund and York Foundation, are set forth in the RICO Statement attached hereto as Exhibit 29, which is incorporated herein by reference.

Youssef Nada and Ahmed Idris Nasreddin, both of whom have been designated under Executive Order 13224 based on their material support and sponsorship of al-Qaida. The funds were transferred through Bank al-Takwa and Akida Bank Private Ltd., two Bahamas based banks controlled by Nada and Nasreddin. Both of those banks have been designated by the U.S. government pursuant to Executive Order 13224, based on their involvement in financing radical groups throughout the world, including Hamas and al Qaida, both before and after the September 11<sup>th</sup> attack.

229. The ongoing investigation of the SAAR Network has also revealed that SAAR entities, including the U.S. branch of the IIRO and Sana-bell, Inc., engaged in financial transactions with Bait Ul-mal, Inc., (BMI, Inc.) an Islamic investing firm established by defendant Soliman Biheiri in New Jersey in 1996. According to federal authorities, BMI and its affiliates have transferred funds to terrorists and terrorist organizations, including al Qaida, Yasin al-Qadi, Musa Abu Marzook, Mohammad Salah and Hamas.

230. During the course of the federal investigation into BMI's financing of terrorism, a BMI accountant contacted an FBI agent and stated that "funds the accountant was transferring overseas on behalf of the company may have been used to finance the Embassy bombings in Africa."

231. As the forgoing demonstrates, the SAAR Network 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.

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

### **BLESSED RELIEF (MUWAFaq) FOUNDATION**

233. The Blessed Relief Foundation, also known as the Muwafaq Foundation, is an ostensible charity established by defendant Yasin al-Qadi.

234. Blessed Relief has long acted as a fully integrated component of al-Qaida's financial and logistical infrastructure, and provided material support and resources to al-Qaida and affiliated FTOs. According to the U.S. government, the Blessed Relief Foundation is a front organization through which wealthy Saudis send millions of dollars to al Qaida.

235. On October 12, 2001, the United States government designated Yasin al-Qadi and the Blessed Relief Foundation under Executive Order 13224, based on their longstanding and integral role in advancing the al-Qaida movement.

236. As the forgoing demonstrates, Blessed Relief Foundation 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.

237. The September 11<sup>th</sup> Attack was a direct, intended and foreseeable product of Blessed Relief Foundation's participation in al Qaida's jihadist campaign.

### **TAIBAH INTERNATIONAL AID ASSOCIATION**

238. Taibah International Aid Association (Taibah) is a charitable organization headquartered in Falls Church, Virginia.<sup>33</sup> Taibah was co-founded by Abdullah A. Bin Laden in 1991.

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<sup>33</sup> The various offices comprising Taibah's international operations, all of which operate under the direction and control of the organization's headquarters, are identified with greater particularity in the More Definite Statement attached hereto as Exhibit 18, which is incorporated herein by reference.

239. Taibah International has long acted as a fully integrated component of al Qaida's financial and logistical infrastructure, and provided material support and resources to al-Qaida and affiliated FTOs.

240. Taibah International has been particularly active in furthering al Qaida's efforts to establish a base of operations in Bosnia. Mustafa al-Kadar, one of five al-Qaida members arrested in 2001 for plotting to attack the United States Embassy in Bosnia, gained entry into Bosnia and Bosnian citizenship rights based on his employment with Taibah International.

241. Based on substantial evidence of pervasive involvement in al Qaida's activities within Bosnia, police raided the offices of Taibah International on December 13, 2001. The raid and subsequent investigation of Taibah International's financial records confirmed that Taibah International diverted donated funds to al Qaida and al Qaida affiliated militants in Bosnia.

242. The investigation further revealed that Taibah International facilitated the entry of al Qaida members into Bosnia by falsely claiming that those terrorists would be serving as employees for the organization in the region.

243. Within Bosnia, Taibah International worked closely with the Global Relief Foundation and Saudi High Commission, from which it received the vast majority of its funding.

244. Taibah International has been directly implicated in al Qaida operations outside of Bosnia as well, including the 1998 United States Embassy bombings in Kenya and Tanzania.

245. Samir Sala and Abdulrahman Alamoudi, two officers of Taibah International's United States branch, are intimately affiliated with several organizations

within the SAAR network. According to Alamoudi's resume, he served as Executive Assistant to the President of SAAR Foundation between 1985 and 1990. Alamoudi also served as President of the Hajj Foundation and Secretary of Success Foundation.

246. On August 16, 2003, officials of Britain's National Terrorist Financial Investigations Unit detained Alamoudi when he attempted to travel from London, England to Damascus, Syria. A search of al-Amoudi's belongings conducted by United Kingdom customs officers discovered approximately \$340,000 in sequentially numbered \$100 dollar bills, two U.S. passports and one Yemeni passport.

247. Federal officials arrested Alamoudi when he returned to the United States on September 28, 2003. In an eighteen count indictment filed shortly thereafter, federal authorities charged Alamoudi with engaging in prohibited financial transactions with the Libyan government, misuse of a passport, procuring naturalization by fraudulent means, and failure to report foreign bank accounts. According to federal officials, Alamoudi used his control of Taibah International, Success Foundation and the Happy Hearts Trust to funnel money to al Qaida through various al Qaida funds, including the designated terrorist organizations Global Relief Foundation and The Foundation for Human Rights and Humanitarian Relief, which supported al Qaida operatives associated with the millennium bombing plot.<sup>34</sup>

248. On December 15, 2001, FBI officials interviewed Ali Hamid el-Tayeb, and employee of Taibah International's Sarajevo, Bosnia office. El-Tayeb advised FBI officials that Mohamed el-Nagmy was, at that time, an employee of the Bosnian offices of both Taibah International and Global Relief Foundation.

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<sup>34</sup> Additional factual allegations relating to Abdul Rahman Alamoudi's material sponsorship of al Qaida are set forth in the RICO Statement attached hereto as Exhibit 30, which is incorporated herein by reference.

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