

EXHIBIT E

Part 1

From: Daniel Horowitz [mailto:bdega@earthlink.net]
Sent: Thursday, February 28, 2008 7:03 AM
To: Burke, Thomas
Subject: Our Discovery

Tom: This is the broad outlines of where we want to go with our initial discovery. I am attaching the Whitehead Request for Admissions as we will be using that with the irrelevant sections excised. I'll have a CMC draft for you later today.

Daniel

Depositions

Note: Some of these people are CAIR board members others are third party witnesses. If some of the names are unclear (e.g. your clients think they know them but with a different spelling, let me know and we will clarify).

Omar Ahmad

Nihad Awad

Bayan Elashi

Ghassen Elashi

Khairy Al Agha (K&A Overseas)

Rackspace.com (PMK)

Miller Musmar PC (PMK)

United Bank of Kuwait (Ahli United Bank) (PMK)

Nehad Hammad

Hussam Aloush

Nabil Sadoun

Mohamed Nimer

Areas of Production

Washington D.C. Real Estate

Transactional documents for purchases/sales/loans, mechanics liens, notes, mortgages etc.

relating to:

929, 923, 917 2nd St. NE Washington DC

205, 208 K Street, Washington DC

453 New Jersey Street, NE Washington, DC

208 "G" Street, Washington, DC

Documents relating to Zahara Investment Corporation and Greater Washington LLC

Holy Land Foundation Documents

Accountings and documents relating to business with HLF in English and in Arabic.

Islamic Association for Palestine

Accountings and documents relating to business with HLF in English and in Arabic.

Organizational Documents

Minutes of meetings, elections, corporate business documentation

Accounting Documents

IRS filings and supporting documentation 2000 to present.

Website

Ownership, hosting (Infocom etc), financial, administrator and related documents.

Content

Activities

"Demonstrations", meetings, seminars, fund-raising.

Fund raising and related conduct (speaking engagements) for legal defense of

the following persons:

Musa Abu Marzook

The Elashi's & Infocom

Abdurahman Alamoudi

Rabith Hadid

Omar Abdel Rahman

Bassam Khafagi

Rafiq Sabir

Yousef Megahed & Ahmed Mohamed

Sami Al-Arian

Jamil Al-Amin (aka Rap Brown)

and groups such as the HLF

(To list just a few)

CAIR Lawsuits / Media

Lawsuits filed by/against.

Demands, threats, negotiations with media personalities e.g. "Dr. Laura", Bill Cunningham, Cong. Ballenger, media entities, eg. YAF

Foreign Funding Sources

E.g. Accountings of money donated by the man you call the "Saudi Warren Buffett" (byw, was Warren Buffett born a billionaire? Did the Saudi Buffett donate all of his money to charity upon his death ?) Cost of Quran's and accountings of where they

were "donated".

Loan activities between Board members and overseas banks e.g. home loans

by AHLI.

Loans, donations to and from overseas sources.

Financial Issues re: Savage

Documentation as to what was copied, how used, donations received via that page link, CAIR's communications with various businesses, entities etc., website hits, website data (probably nothing private e.g. probably not IP's)

Urban Legends

Documentation of the contents of that page <http://www.cair.com/AboutUs/urbanlegends.aspx> esp. contacts / statements by FBI as referenced therein.

Political Donations

Donations made by CAIR affiliated officers to politicians on or about 9/11/2001.

Aggregate Donations

Accountings of donations in the aggregate to various groups among all CAIR entities.

Donations in the aggregate to CAIR groups.

Loans in the aggregate to CAIR groups.

Request for Admissions

We will be filing the Whitehead case Requests absent the portions that are particularly targeted to the facts of his case (I am attaching a copy that you can review).

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF VIRGINIA BEACH

COUNCIL ON AMERICAN-ISLAMIC)
RELATIONS, INC.)
Plaintiff/Counterclaim Defendant,)
)
v.)
)
ANDREW WHITEHEAD)
Defendant/Counterclaim Plaintiff.)
_____)

Law No. CL 04-926

DEFENDANT'S FIRST REQUEST FOR ADMISSIONS TO PLAINTIFF

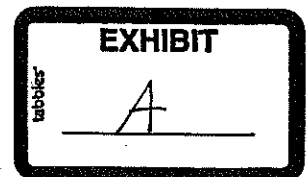
Pursuant to Rule 4:11 of the Rules of the Supreme Court of Virginia, Defendant, Andrew Whitehead, hereby submits these requests for admission to Plaintiff Council on American-Islamic Relations, Inc. ("CAIR").

DEFINITIONS

1. "Ahmad" means the person sometimes known as "Omar Ahmad" or "Omar Yehya" or "Omar Yehya Ahmad" and who is sometimes identified as the "chairman of the board" of CAIR.

2. "Awad" means the person sometimes known as "Nihad Awad," "Nihad Hammad," or "Abu Haitham" and who is sometimes identified as the "executive director" of CAIR.

3. "CAIR" means (a) the plaintiff in this action, its past and present officers, directors, (including, but not limited to, Ahmad, Awad, Hooper as defined below, and Jaber, as defined below), advisory board members, agents, attorneys, and representatives, and (b) each and every "chapter" listed at www.cair-net.org/default.asp?Page=chapters (Appendix



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

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

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

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

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

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

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

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

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

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

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

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

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

16. "Jaber" means the person sometimes known as "Rafeeq Jaber."

17. "Major Donor or Contributor" means any person who has made a donation or contribution valued in excess of \$1,000.00.

18. "Marzook" means the person identified in paragraph 1 of the Second Superseding Indictment in *United States v. Marzook, et al*, Case No. 03 CR 978 (U.S.D.C. ND II) (Exhibit 6).

19. "Named Persons" means (a) any FTO, (b) any Identified Terrorist, (c) any person known to you to either, now or in the past "engage in Terrorist Activity," (d) the (i) Islamic Charity Society of Hebron, (ii) Dar El-Salam Hospital, (iii) Islamic Science and Culture Committee, (iv) Ramallah Charitable Committee; a/k/a Committee of Charity and Religious Alms in Ramallah a/k/a/ Charity Committee of Ramallah a/k/a Ramallah Zakat Committee, (v) Nablus Charitable Committee a/k/a Nablus Zakat Committee, (vi) Qalgilia Zakat Committee, (vii) Jenin Charitable Committee a/k/a Jenin Zakat Committee, (viii) Tulkarem Zakat Committee a/k/a Tulkarem Charitable Committee a/k/a Committee of Charity and Religious Alms in Tulkarem (ix) Al-Ansar Charity, (x) the Islamic Association (Gaza) a/k/a Al Jamaya Al-Islamiya, (xi) al-Mujama al-Islami, (xii) Islamic Charitable Society Al-Bireh, (xiii) al-Islah Charitable Society, (xiv) the Association de Secours Palestinien (ASP)(Basel, Switzerland), (xv) Commite de Bienfaisance et de Secours aux Palestiniens (CBSP), (xvi) Palestinian Association in Austria, (xvii) Interpal (London), (xviii) Al-Ihsan Charitable Society, (xviii) Dar al-Huda Society, and (xx) Islamic An-Naqqa Society for Women, Bethlehem, (e) the Islamic Association for Palestine, and its corporate predecessors and affiliates ("IAP"), (f) the Muslim Brotherhood, and its corporate

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

- Exhibits 1 - 6.
- Declaration in Support of Pre-Trial Detention by David Kane, *United States v. Biheiri*, Case No. 03-365-A (U.S.D.C. ED Va.) (Exhibit 7).
- Affidavit in Support of Criminal Complaint by Brett Gentrup, *United States v. Alamoudi*, (U.S.D.C. ED Va.) (Exhibit 8).
- Supplemental Declaration in Support of Deteration by Brett Gentrup, *United States v. Alamoudi*, Appeal from Case No. 03-1009M (U.S.D.C. ED Va.) (Exhibit 9).
- Indictment filed in *United States v. Sami Al-Arian, et al.* (U.S.D.C. MD Fl.) (Exhibit 10).
- Memorandum Opinion, *Holy Land Foundation v. Ashcroft*, CA 02-442 (GK) (U.S.D.C. D DC) (Exhibit 11).
- Third Amended Complaint, *Burnett et al. v. Al-Baraka Investment and Development Corporation, et al.*, Case Number 1:02CV016 16 (JR) (U.S.D.C. D DC) (Exhibit 12).
- Special April 2002 Grand Jury Charge, *United States v. Arnaout*, No. 02 CR 892 (U.S.D.C. ED II) (Exhibit 13).
- Affidavit of Robert Walker, *United States v. Benevolence International Foundation, Inc. et al.*, 02 CR 0414 (U.S.D.C. ED II) (Exhibit 14).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

GENERAL INSTRUCTIONS

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

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

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

REQUESTS

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

49. Admit Exhibit 37 states, in part:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

58. Admit Hamas is an FTO.

Answer:

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

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

Answer:

60. Admit Awad believes:

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

Answer:

61. Admit Ahmad believes:

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

Answer:

62. Admit Hooper believes:

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

Answer:

63. Admit Jaber believes:

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

Answer:

64. Admit each current CAIR officer or director believes:

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

Answer:

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

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

122. Admit CAIR protested Marzook's extradition.

Answer:

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

Answer:

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

Answer: