

EXHIBIT E

Part 2

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

156. Admit CAIR shared a computer server with IAP.

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

200. Admit Sadoun is a former officer of MAYA.

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

209. Admit UASR received funds from Marzook.

Answer:

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

Answer:

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

Answer:

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

Answer:

213. Admit Sadoun supports Hamas.

Answer:

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

Answer:

215. Admit Sadoun believes:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

224. Admit Ahmed supports Hamas.

Answer:

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

Answer:

226. Admit Ahmed believes:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

230. Admit Khateeb is a Saudi national.

Answer:

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

Answer:

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

Answer:

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

Answer:

234. Admit Khateeb supports Hamas.

Answer:

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

Answer:

236. Admit Khateeb believes:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

247. Admit Al-Akhras believes:

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

Answer

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

257. Admit CAIR has received donations or contributions from the SAAR Foundation and/or its members and related entities.

Answer:

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

Answer:

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

Answer:

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

Answer:

261. Admit CAIR has received donations or contributions from the Islamic Assembly of North America.

262. Admit CAIR has received donations or contributions from the Islamic Circle of North America (ICNA).

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

278. Admit CAIR is a "public figure."

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

289. Admit Awad is a Named Person.

Answer:

290. Admit Ahmad is a Named Person.

Answer:

291. Admit Awad is identified in the FBI Memorandum.

Answer:

292. Admit Ahmad is identified in the FBI Memorandum.

Answer:

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

Answer:

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

Answer:

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

289. Admit Awad is a Named Person.

Answer:

290. Admit Ahmad is a Named Person.

Answer:

291. Admit Awad is identified in the FBI Memorandum.

Answer:

292. Admit Ahmad is identified in the FBI Memorandum.

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

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

Answer:

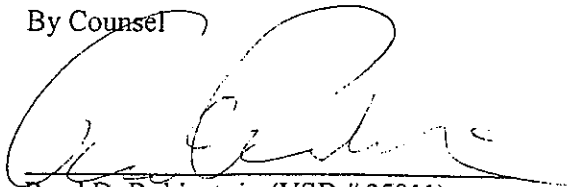
327. Admit CAIR issued a press release in 1994 stating in relevant part:

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

Answer:

Dated: January 7th, 2005.

Respectfully submitted,
ANDREW WHITEHEAD
By Counsel

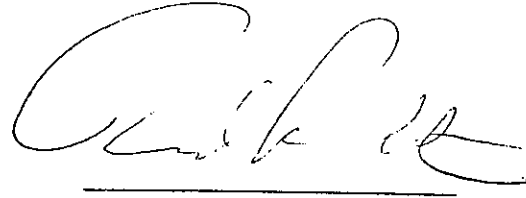


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CERTIFICATE OF SERVICE

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

Jeremiah A. Denton III
VBN#19191
477 Viking Drive, Suite 170
Virginia Beach, VA 23452



A handwritten signature in black ink, appearing to read "Jeremiah A. Denton III", is written over a horizontal line.