

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Civil File No. 09-CV-138 DWF/JJG

---

AMERICAN CIVIL LIBERTIES  
UNION OF MINNESOTA,

Plaintiff,

**DECLARATION OF**  
**JANEHA EDWARDS**

v.

TAREK IBN ZIYAD ACADEMY; et  
al.

Defendants.

---

Pursuant to 28 U.S.C. § 1746, I, Janeha Edwards, declare that:

1. My name is Janeha Edwards, and I reside at 1094 Dale Street, St. Paul, Minnesota, 55117. I was employed by Tarek Ibn Ziyad Academy as an administrative assistant for Mahrous Kandil, Hesham Hussein, and Asad Zaman from June 2004 through May 2009. I quit in the spring of 2009 because years of caustic treatment at the hands of TIZA officials made the prospect of continuing in my position intolerable. My husband currently works for the Muslim American Society on an ongoing basis.

2. Throughout my employment with TIZA, I was part of the school's daily operations. I was responsible for answering phones, welcoming guests to the school, keeping the books, paying bills, and a host of other administrative activities. I interacted on a daily basis with Kandil, Zaman, Hussein, and Magdy Rabeaa.

3. In my experience, there is no real distinction between the operations of TIZA and MAS. MAS does not have an office of its own, but instead simply operates out of TIZA's facilities. Their mail comes to the same mailbox, their faxes come through the same fax machine, and their telephone calls come to the same phone. MAS runs a daycare in the school building. MAS files and TIZA files are intermingled. Zaman, Rabeaa and Kandil make decisions about and carry on business on behalf of both institutions without distinguishing between them. Though I was technically employed by TIZA, I performed work for MAS on a daily basis.

4. The Islamic faith of Zaman, Rabeaa and Kandil and others associated with the organizations has a strong influence on the decisions they make about the school, and on the way they treat TIZA's teachers, staff members, and students. Zaman, Rabeaa, and others refer to Muslim employees as "Brother" or "Sister." Students recite an Islamic prayer in their Arabic course. I contacted the ACLU when I learned about this lawsuit because I feel that this kind of overlap between religious faith and a public school is inappropriate and illegal. I intend to make myself available to provide further testimony on these matters as the case goes forward.

5. TIZA officials are also highly secretive about TIZA's finances and other general operations. Zaman and Rabeaa maintain a room at TIZA to which only they have a key. No one else is allowed in the room without their permission. Before I left my job, they had even become secretive about the date and time of TIZA board meetings. They maintain these secrets by threatening those who know the information with their jobs. For example, through the fall of 2008 and winter of 2009, TIZA began making it

increasingly difficult to learn the dates and times of their board-meetings. Many people came to me on a regular basis requesting information about the subject. Zaman and Kandil did not provide me with the information. Once, I contacted Moira Fahey, herself a member of TIZA's board of directors, in search of the information. She told me that she could not give me the information, because she did not want to lose her job.

6. I am very concerned that I will be harassed, intimidated, or publicly embarrassed, and that my husband's relationship with the Muslim American Society of Minnesota will be affected as direct result of anyone finding out that I am or have been working with the ACLU.

7. I fear this treatment because TIZA officials resorted to intimidation and threats against my coworkers and me for nearly the entire time I worked at the school. For six years, I watched Asad Zaman, Magdy Rabeaa and Mahrous Kandil lash out in order to control those around them, and to retaliate against anyone who spoke poorly of the school, or otherwise challenged their authority.

8. One incident that leads me to this conclusion occurred in the spring of 2009. Two girls had recently been admitted as TIZA students. After a few days of classes, it became apparent that the girls' academic skills had been improperly assessed, and that they needed to be moved back a year to a more appropriate grade level. The girls' father had an extremely unhappy reaction when I gave him the news. He came to the school, yelled at me extensively in the school's public hallway, and demanded a meeting with Zaman and Rabeaa. After the meeting ended, Rabeaa brought me out to the parking lot, blamed me for the incident, and berated me. After my meeting with Rabeaa,

I told Zaman I felt that I was being treated unfairly over the situation. Zaman was extremely upset that I was challenging his authority, told me I should have made the man "feel like a king while they massacred his family," and suggested that "we could just kill you, yeah tell your husband we'll do his job for him."

9. That kind of extreme reaction, along with the generally aggressive behavior I witnessed during my tenure with the school, makes me fear what Zaman, Rabeaa, Kandil, and the others will do or say about me when they find out I am working with the ACLU. My husband still has weekly contact with all three men through MAS. I believe that, in addition to whatever else they do, they will try to get to me through him, which would cause serious stress within my family. I realize my participation in this lawsuit would be a public matter, but I fear what will happen to me and my family if the Court does not act to protect me and others who say unflattering things about the school.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26th day of January, 2010.

s/Janeha Edwards  
Janeha Edwards