



In The Matter Of:

*Stanley Boim, et al. v.
Quranic Literacy Institute, et al.*

*Deposition of Nihad Awad
October 22, 2003*

*Miller Reporting Company
735 8th Street, SE
Washington, DC USA 20003
(202) 546-6666*

*Original File 1022AWAD.ASC, 235 Pages
Min-U-Script® File ID: 0920425094*

Word Index included with this Min-U-Script®

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

STANLEY BOIM, et al.,
Plaintiffs,
v. : Civil Action
: No. OOC 2905

QURANIC LITERACY INSTITUTE, et al., :
Defendants.
Washington, D.C.

Wednesday, October 22, 2003

The video deposition of NIHAD AWAD, called
for examination by counsel for the Plaintiffs in
the above-entitled matter, pursuant to notice, at
the law offices of Lewin & Lewin, 1828 L Street,
N.W., Washington, D.C., convened, pursuant to
notice, at 10:10 a.m., before Catherine B. Crump, a
notary public in and for the District of Columbia,
when were present on behalf of the parties:

APPEARANCES:

On behalf of the Plaintiffs:

STEPHEN J. LANDES, ESQ.
DAVID M. OPPENHEIM, ESQ.
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On behalf of the Witness:

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Transnational Business Attorney Group
1150 Connecticut Avenue, N.W.
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VIDEOGRAPHER: RON MEEK,
Ron Meek & Video Associates

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PROCEEDINGS

[1] [2] **VIDEOGRAPHER:** This is Tape No. 1 in the
[3] video deposition of Nihad Awad in the matter of
[4] Stanley Boim, et al. v. Quranic Literacy Institute,
[5] et al., to be conducted in the United States Court
[6] for Northern District of Illinois, Eastern
[7] Division, Case No. OOC 2905.

[8] Today's date is October 22, 2003. The
[9] time is 10:10 a.m. We are located at the offices
[10] of Lewin & Lewin at 1828 L Street, Northwest,
[11] Washington, D.C.

[12] Will counsel identify themselves and
[13] anyone with them, beginning with the attorney
[14] giving notice?

[15] **MR. LANDES:** My name is Stephen J.
[16] Landes, attorney for the plaintiffs.

[17] **MR. OPPENHEIM:** David Oppenheim,
[18] attorney for the plaintiffs.

[19] **MR. LANDES:** I better—they don't have
[20] microphones. So David Oppenheim with Wildman,
[21] Harrold, Allen & Dixon for the plaintiffs; Alyza
[22] Lewin of Lewin & Lewin, counsel of record for

1—10:11:33 22—10:12:17

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(1) plaintiffs; and John Eubanks is a law clerk at
(2) Vin & Lewin.

(3) **MR. BOYD:** On behalf of Defendant The
(4) Holy Land Foundation, John Boyd.

(5) **MR. McMAHON:** On behalf of the deponent,
(6) Nihad Awad, Martin F. McMahon.

(7) **MR. LANDES:** Would you please swear the
(8) witness?

(9) Whereupon,
(10) NIHAD AWAD

(11) was called to testify and, having first been duly
(12) sworn by the notary public, was examined and
(13) testified as follows:

(14) **EXAMINATION BY COUNSEL FOR THE PLAINTIFFS**
(15) **BY MR. LANDES:**

(16) **Q:** Please state your name.

(17) **MR. McMAHON:** Mr. Landes, before we
(18) begin the deposition, I want to note my objections
(19) on the record to various items. Number one, when
(20) we received the notice of subpoena, there was no
(21) reference on there that this would be videotaped.
(22) You were not—in a professional spirit, did not

1—10:12:22 22—10:13:21

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(1) even alert me to that. If I had known that, I
(2) would have moved for a protective order in this
(3) district court for a lot of reasons.

(4) I understand from Mr. Meek that there
(5) will be an original made of this which will be in
(6) your possession and that he will have one copy.
(7) We will buy his copy, sir. I want you to put on
(8) the record the universe of potential people who
(9) will have access to this original videotape.

(10) **MR. LANDES:** I'll say to you that at the
(11) present time, the videotape will be used among
(12) counsel and their consultants and experts; however,
(13) if you wish to have a protective order, and we
(14) could decide then ultimately how this tape can be
(15) used, we'll do that after you file a motion for
(16) protective order.

(17) **MR. McMAHON:** Okay. At this time, would
(18) you please identify the consultants and experts
(19) that would have potential access to this tape?

(20) **MR. LANDES:** We have one expert that's
(21) been identified on the record, which is Mr. Muvane
(22) Paz, Dr. Muvane Paz; however we have consulting

1—10:13:24 22—10:14:15

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(1) experts we have not identified and we will not
(2) identify them at the deposition.

(3) **MR. McMAHON:** Okay. In connection with
(4) this case, sir, preparing for it at any time, have
(5) your or anybody in your office had contact with one
(6) Steven Emerson?

(7) **MR. LANDES:** It's not my deposition.
(8) I'm not going to answer the question, and I think
(9) that what counsel should do is file the motion for
(10) a protective order, and then we can have it out in
(11) front of the Court has to how this is going to be
(12) used and whether you have any right to oppose our
(13) selection of any consultant, and it's not a
(14) statement on my part as to who our consultants may
(15) or may not be. I think the appropriate venue for
(16) that discussion is in the context of a motion for a
(17) protective order.

(18) **MR. McMAHON:** Is there reason why you
(19) didn't advise us that this would be a videotaped
(20) deposition?

(21) **MR. LANDES:** We only advised counsel, I
(22) think last week. I don't know why you didn't get

1—10:14:20 22—10:15:14

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(1) that notice. We were not aware at the time that
(2) you were counsel to Mr. Awad. We didn't have
(3) access to him.

(4) I think this matter can be resolved
(5) through a motion for protective order, and I
(6) suggest we do it at that time.

(7) **MR. McMAHON:** Yeah. Well, you certainly
(8) served him with a subpoena and could have
(9) referenced on the subpoena that it's a videotape
(10) consistent with 30[B]2. I'm just very upset about
(11) that, and I want to go further on the record, sir,
(12) that should your law firm in any way publicize this
(13) videotape in any manner inconsistent with the
(14) litigation principles in our court here in the
(15) District of Columbia, we will initiate suitable
(16) legal proceedings against you as the custodian of
(17) that tape and your law firm. I want you to be on
(18) specific notice of that.

(19) **MR. LANDES:** I think ultimately we'll
(20) have the district court here make that decision as
(21) to who can have access to the tape under the
(22) applicable standards.

1—10:15:15 22—10:15:54

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[1] MR. McMAHON: Right. Well, they won't
[2] make any decision about initiation of a lawsuit
[3] against yourself or your law firm, sir. Let me
[4] tell you that.
[5] MR. LANDES: Fine.
[6] MR. McMAHON: And if you breach any
[7] professional obligations, this man will also pursue
[8] professional grievances against you.
[9] MR. LANDES: Fine. I would suggest to
[10] you that if you wish to protect the videotape, that
[11] you should file a motion for protective order or we
[12] could file the motion for protective order.
[13] I think we should move on with the
[14] deposition.
[15] MR. McMAHON: It's your deposition.
[16] MR. LANDES: That's right.
[17] BY MR. LANDES:
[18] Q: So please state your name.
[19] A: Nihad Awad.
[20] Q: How do you spell that?
[21] A: N-I-H-A-D, A-W-A-D.
[22] Q: All right. Are you known by any other

1—10:15:54 22—10:18:06

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[1] names as well?
[2] A: My full and complete name is Nihad Awad
[3] Hammad.
[4] MR. LANDES: Let me just show you a
[5] document that we have. I'll ask the court reporter
[6] to mark this as Awad Deposition Exhibit No. 1.
[7] [Awad Exhibit No. 1 was
[8] marked for identification.]
[9] BY MR. LANDES:
[10] Q: Have you seen this document before, sir?
[11] MR. McMAHON: Read it carefully, Nihad.
[12] [Witness peruses exhibit.]
[13] MR. McMAHON: The question is have you
[14] ever seen that document before, and it's either a
[15] yes or a no.
[16] BY MR. LANDES:
[17] Q: Let me ask you this: Is this your
[18] signature on the document?
[19] A: It looks like it, yes.
[20] Q: The document says: "The undersigned
[21] Nihad Awad hereby certifies, deposes, and says that
[22] Nihad Awad is/are one in the same persons as Nihad

1—10:18:12 22—10:19:05

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[1] Hamad and Nihad Hammad", one H-A-M-A-D and
[2] H-A-M-M-A-D. Is that correct?
[3] A: I read it here. As I said in the first
[4] question, Nihad Awad and Nihad Hammad are the same
[5] person. It's me, just a different spelling of my
[6] name.
[7] Q: And you can spell Hammad either with one
[8] M or two Ms?
[9] A: Mainly with two Ms, but I have seen it
[10] written in some papers sometimes Nihad Hammad, so I
[11] want to make sure that it is the same person.
[12] That's me.
[13] Q: Either way? Now, are you known by any
[14] other names?
[15] A: No.
[16] Q: A name by Abu or anything?
[17] A: No.
[18] Q: I ask because sometimes we've come
[19] across witnesses in this case who have maybe a
[20] diminutive name or some other name that's Abu or—
[21] A: Nothing on papers.
[22] Q: What about in individual interaction?

1—10:19:07 22—10:19:48

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[1] A: That's like a social thing among
[2] ourselves, between me and my wife.
[3] Q: Okay. Beyond your wife, and I'm not
[4] asking about that, but outside, your friends or
[5] colleagues or associates, are you known by any
[6] other name?
[7] A: In the Arab culture, people are called
[8] and named by the oldest son of their children.
[9] Q: Are you referred to by that name
[10] sometimes?
[11] A: Very seldom.
[12] Q: What would that be?
[13] A: Abu Haitham.
[14] Q: H-A-I-T-H-A "M" or "N"?
[15] A: M, as in Mary.
[16] Q: As in Mary, fine. Thank you. Mr.—I'll
[17] refer to you then as Mr. Awad. Are you comfortable
[18] with that?
[19] A: Yes. Yes.
[20] Q: Fine. Now, have you ever had your
[21] deposition taken before?
[22] A: No.

1—10:19:49 22—10:20:41

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[1] Q: Okay. So I'm going to ask you a series
[2] questions today. We have a court reporter here
[3] who is taking it down, and we've obviously had an
[4] interchange of the fact that this is on videotape.

[5] The lawyers will straighten that out later on.

[6] At any time if you don't understand my
[7] question, feel free to ask me to restate it, to
[8] clarify it if there's something you don't
[9] understand in the question. I will make the best
[10] effort I can to make the question clear. Is that
[11] understood?

[12] A: Yes.

[13] Q: And otherwise I'll assume you understand
[14] the question; is that fair?

[15] A: Yes.

[16] Q: Let's just go back to this document. Do
[17] you believe that this is your signature on this
[18] document?

[19] A: It looks like it.

[20] Q: Okay. You have no reason to believe
[21] this is not an authentic document?

[22] A: I have to see when it was signed. '96.

1—10:21:00 22—10:21:46

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[1] I don't remember this document.

[2] Q: Okay. Now, it says Council of American
[3] Islamic Relations, Inc. on the top. Do you see
[4] that?

[5] A: Yes.

[6] Q: It appears to be your company
[7] stationery.

[8] A: No.

[9] Q: Is that a correct address at the time?

[10] A: No, it's not.

[11] Q: It's not? Okay.

[12] A: Also, the name is misspelled of the
[13] organization.

[14] Q: In which way?

[15] MR. McMAHON: And when you state that
[16] it's his company, is that your—

[17] MR. LANDES: The company he's related to
[18] or he is positioned with. That's all I meant.

[19] MR. McMAHON: Okay.

[20] [Witness confers with counsel.]

[21] BY MR. LANDES:

[22] Q: Speak to me.

1—10:21:48 22—10:22:32

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[1] A: Yeah.

[2] MR. McMAHON: If the address is not
[3] correct, tell him. If the name is not correct,
[4] tell him. Let's move on.

[5] MR. LANDES: Yeah.

[6] THE WITNESS: It should be Council on
[7] American Islamic Relations. Second, the suite
[8] number, what does it say?

[9] MR. LANDES: I see it saying 307.

[10] THE WITNESS: I don't know if it's the
[11] right suite number.

[12] BY MR. LANDES:

[13] Q: All right. But in 199—and I don't want
[14] to belabor the point. In 1996, was the Council on
[15] American Islamic Relations located at 1511 K
[16] Street, Northwest, Washington, D.C.?

[17] A: Yes.

[18] Q: Where were you born?

[19] A: In Jordan.

[20] Q: And would it be fair to say that you're
[21] a native speaker of Arabic?

[22] A: Yes.

1—10:22:35 22—10:23:09

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[1] Q: And you read Arabic?

[2] A: Yes.

[3] Q: So if you see a document written in
[4] Arabic, I would expect you to be able to read it
[5] and translate it into English.

[6] A: Yes.

[7] Q: Have you discussed—let me backup. Are
[8] you familiar with this lawsuit, Boim v. Quranic
[9] Literacy Institute?

[10] A: No.

[11] Q: You've never heard of this?

[12] A: Just recently.

[13] Q: When?

[14] A: Weeks ago, months ago.

[15] Q: How did you hear about it?

[16] A: Just maybe newspapers.

[17] Q: You didn't hear about this case when it
[18] was filed?

[19] A: No.

[20] Q: It was filed in the year 2000.

[21] A: No.

[22] Q: Have you ever discussed this case with

1—10:23:11 22—10:23:35

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[1] anybody from IAP?

[2] A: No.

[3] Q: Or anybody—

[4] MR. McMAHON: Would you identify who IAP
[5] is for the record, please?

[6] BY MR. LANDES:

[7] Q: You've heard of an organization called
[8] the Islamic Association for Palestine?

[9] A: Yes.

[10] Q: In fact, you once worked in that
[11] organization. Correct?

[12] A: Yes.

[13] Q: And has anybody from IAP ever discussed
[14] this case with you?

[15] A: No.

[16] Q: Are you familiar with an organization
[17] known as the Holy Land Foundation?

[18] A: Yes.

[19] Q: Has anybody in the Holy Land Foundation
[20] discussed this case with you?

[21] A: No.

[22] MR. McMAHON: I'll state for the record

1—10:23:37 22—10:24:19

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[1] that I had, as his counsel, conversations with Mr.
[2] Boyd and which I think are totally protected, and
[3] other than that, I just want to clarify the record.

[4] MR. LANDES: I'm not inquiring as to any
[5] conversations you had with your lawyer.

[6] MR. McMAHON: And his answer stands, no.

[7] BY MR. LANDES:

[8] Q: All right. Have you ever discussed this
[9] lawsuit with a man named Omar Ahmad?

[10] A: Yes.

[11] Q: How recently?

[12] A: Two days ago.

[13] Q: And what did he tell you?

[14] A: I asked if he did the deposition, and he
[15] said yes, he did.

[16] Q: Did he tell you what he testified to?

[17] A: No.

[18] Q: Did he make any suggestions as to the
[19] questions you'd be asked at this deposition?

[20] A: No.

[21] Q: Did he give you a copy of his transcript
[22] of his deposition?

1—10:24:19 22—10:25:15

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[1] A: Yes.

[2] Q: His transcript?

[3] A: Yes.

[4] Q: and Did you read it?

[5] A: Not all of it.

[6] Q: How much of it?

[7] A: Maybe one-fourth.

[8] Q: All right. Can you share with me your
[9] impressions of that deposition?

[10] A: I can't make anything of it.

[11] Q: Why don't you tell me in short your life
[12] story so we don't have to go through a question and
[13] answer. You give me a thumbnail description of
[14] where—when you came to this country, where you
[15] were educated, the jobs you've held and so on.

[16] MR. McMAHON: Can you, before you answer
[17] that question, proffer as to why this gentleman is
[18] the subject of discovery in your lawsuit?

[19] MR. LANDES: You know, it should be
[20] obvious, if you'd read the complaint, that the
[21] Islamic Association for Palestine is a defendant in
[22] this lawsuit. This gentleman was a—we'll develop

1—10:25:19 22—10:25:51

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[1] on the record, obviously involved with that
[2] organization, and therefore he is the subject of a
[3] deposition here.

[4] MR. McMAHON: And what time frame are we
[5] talking about with his involvement with IAP?

[6] MR. LANDES: We'll take the deposition
[7] and we'll find out.

[8] MR. McMAHON: Okay.

[9] BY MR. LANDES: All right?

[10] MR. McMAHON: Condensed life story to
[11] move this on.

[12] THE WITNESS: Okay. Was born in Jordan,
[13] moved to the U.S., and I'm here.

[14] MR. LANDES: That's pretty condensed.

[15] THE WITNESS: You asked me short.

[16] MR. LANDES: But I asked you also—

[17] MR. McMAHON: Education.

[18] MR. LANDES: Let me ask the questions.
[19] Okay?

[20] MR. McMAHON: You did.

[21] MR. LANDES: Well, I don't think I need
[22] your comments. All right? I know you're in a

1—10:25:52 22—10:26:25

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1) hurry to get out of here, but the fact of the
2) matter is this is an important witness who was
3) involved in important things having to go to the
4) matters in this lawsuit. Okay? If you're going to
5) interfere with it, it's just going to take that
6) much longer.

7) **MR. BOYD:** I'm going to interpose an
8) objection to your testifying that this is an
9) important witness.

10) **MR. LANDES:** Fine.

11) **MR. BOYD:** I don't know he is at all.

12) **MR. LANDES:** We'll find out. That's
13) why—

14) **MR. BOYD:** And I don't want you
15) characterizing it on the record. Thank you.

16) **MR. LANDES:** Mr. Boyd, you know, we take
17) discovery depositions to find out facts in cases.
18) Okay?

19) **MR. BOYD:** Ask your question, sir.

20) **MR. LANDES:** We cannot predict until the
21) deposition is over as to what information the
22) witness has. That's why we take depositions.

1—10:26:27 22—10:27:05

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1) **MR. BOYD:** I couldn't agree more. So
2) please don't characterize it on the record.

3) **MR. LANDES:** All right. I would say
4) potentially important witness.

5) **BY MR. LANDES:**

6) **Q:** All right. Mr. Awad, when came to this
7) country, how old were you?

8) **A:** I came in 19—I think 1984, yes, so I
9) was 23, 24 years old.

10) **Q:** So you were born in 1960?

11) **A:** '61.

12) **Q:** And did you come here to get an
13) education?

14) **A:** Yes.

15) **Q:** And where did you go to school?

16) **A:** University of Minnesota.

17) **Q:** All right. And what did you did study?

18) **A:** Civil engineer.

19) **Q:** And did you get a degree?

20) **A:** No.

21) **Q:** How many years with the University of
22) Minnesota?

1—10:27:08 22—10:27:42

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1) **A:** I don't remember exactly how many years,
2) but from '84, probably late eighties. I don't
3) remember the exactly when.

4) **Q:** You were there more than four years?

5) **A:** Yes.

6) **Q:** But you didn't get a degree?

7) **A:** No.

8) **Q:** Did you get a college degree anywhere
9) else?

10) **A:** No.

11) **Q:** What did you do upon graduating from the
12) University of Minnesota?

13) **A:** Prior?

14) **Q:** After.

15) **A:** After, I worked.

16) **Q:** For who?

17) **A:** At the University of Minnesota.

18) **Q:** Doing what?

19) **A:** In the hospital.

20) **Q:** In what position?

21) **A:** Material management.

22) **Q:** How long did you have that job?

1—10:27:51 22—10:28:30

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1) **A:** Several years. Over five years.

2) **Q:** To what year?

3) **A:** Probably until '93.

4) **Q:** Okay. And then what did you do?

5) **A:** I worked for IAP for one year.

6) **Q:** What year was that?

7) **A:** Between '93 and '94.

8) **Q:** All right. And then what did you do
9) after that?

10) **A:** I moved to Washington.

11) **Q:** For what reason?

12) **A:** To work for CAIR.

13) **Q:** C-A-I-R?

14) **A:** Yes.

15) **Q:** And that's the Council on Arab Islamic
16) Relations. Correct?

17) **A:** No.

18) **Q:** What is it?

19) **A:** Council on American Islamic Relations.

20) **Q:** I'm sorry. Council on American Islamic
21) Relations. We'll call it CAIR, C-A-I-R, for the
22) court reporter?

1--10:28:31 22--10:29:28

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[1] A: Correct.
[2] Q: Okay. Now, you received a subpoena to
[3] come to here today. Correct?
[4] A: Correct.
[5] MR. LANDES: Putting aside the
[6] disagreement about the video, the subpoena, I'll
[7] ask this to be marked Exhibit 2.
[8] [Awad Exhibit No. 2 was
[9] marked for identification.]
[10] MR. McMAHON: Was there a check sent
[11] with this?
[12] MR. LANDES: I believe so.
[13] MR. McMAHON: Did you receive a check?
[14] THE WITNESS: Yes.
[15] BY MR. LANDES:
[16] Q: Is this the subpoena, copy of the
[17] subpoena you received, sir?
[18] A: Looks like it.
[19] Q: All right. Now, if you look at the
[20] subpoena, the third page, Exhibit A—do see
[21] that?—and it asks you to bring documents of a
[22] certain character. Do you see that?

1--10:29:30 22--10:30:11

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[1] A: I see it.
[2] Q: All right. Now, we asked you to produce
[3] documents, and you haven't produced any documents.
[4] Is that because you don't have any documents that
[5] responsive to the subpoena?
[6] A: That's right.
[7] Q: All right. You looked at this before
[8] you came today?
[9] A: Yes, I did.
[10] Q: And it's your testimony that you have no
[11] responsive documents?
[12] A: That's correct.
[13] Q: Okay. Now, for the purposes of this
[14] deposition, Mr. Awad, I'm going to use some terms,
[15] and it's not my intention to get involved in any
[16] political disagreement from either side. Okay?
[17] Just so that we use a few terms so we just know
[18] what we're talking about.
[19] So if you use the term "Israel, I mean
[20] Israel with the 1967 borders. Do you under that?
[21] A: Yes.
[22] Q: Okay. If I say "Historic Palestine", I

1--10:30:15 22--10:30:58

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[1] mean Palestine within the borders of the British
[2] mandate. Do you understand what that is?
[3] A: Yes.
[4] Q: Okay. And if I say occupied
[5] territories, it would be the territories if you
[6] took Israel, minus Historic Palestine and come up
[7] with the difference, which is the occupied
[8] territories, occupied in 1967. Is that
[9] understandable?
[10] A: Yes.
[11] Q: Okay. So just for frame of reference.
[12] A: Okay.
[13] Q: So there's no disagreement as to what
[14] we're talking about.
[15] A: Okay.
[16] Q: Okay? Now, you said that you worked at
[17] the Islamic Association for Palestine, IAP.
[18] Correct?
[19] A: Yes.
[20] Q: And what was the period of time that you
[21] worked there? When in 1993 did you go to work
[22] there?

1--10:30:59 22--10:31:56

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[1] A: That was almost nine or ten years ago.
[2] I believe it was from '93 to '94.
[3] Q: Do you remember if it was the beginning
[4] of '93? The end? '93-'93 is a total of 24 months.
[5] So would you just tell us what your recollection is
[6] as to when in '93 you came and when in '94 you
[7] left?
[8] A: I'm not sure, but it could be after
[9] January in beginning of '93. I was almost one
[10] year. I remember leaving IAP around April or May.
[11] Q: Of '94?
[12] A: So that means maybe I started on—after
[13] January. It could be March, April. I don't
[14] remember.
[15] Q: All right. And what was your position?
[16] A: Public relations.
[17] Q: Did you have a title?
[18] A: Director of public relations.
[19] Q: How did you come to get a position at
[20] IAP?
[21] A: I was offered that position.
[22] Q: By whom?

1—10:31:57 22—10:32:43

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[1] A: By one of their staffers.
 [2] Q: And who was that?
 [3] A: Ghassan.
 [4] Q: Ghassan Alaji?
 [5] A: No. Ghassan Saleh.
 [6] Q: Could spell that please?
 [7] A: G-H-A-S-S-A-N, S-A-L-E-H.
 [8] Q: S-A-L-E-H, okay. What was his position
 [9] there?
 [10] A: He was office manager.
 [11] Q: And now we've been told and there's been
 [12] testimony in this case that IAP had a number of
 [13] different offices and related organizations.
 [14] You've heard of an organization called the American
 [15] Middle East League for Palestine?
 [16] A: No.
 [17] MR. BOYD: Object to the form of the
 [18] question.
 [19] BY MR. LANDES:
 [20] Q: Have you heard of an organization called
 [21] A-M-E-L-P?
 [22] A: No.

1—10:32:48 22—10:33:35

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[1] Q: All right. Where was it? I'm sorry.
 [2] You were in Dallas; is that where you were working?
 [3] A: Yes.
 [4] Q: Richardson, Texas?
 [5] A: Yes.
 [6] Q: At that time, did IAP have other
 [7] offices?
 [8] A: I don't remember.
 [9] Q: Was there an office in Chicago?
 [10] A: I did not remember.
 [11] Q: As far as you know, the one office was
 [12] in Richardson, Texas?
 [13] A: Yes.
 [14] Q: Was Ghassan Saleh also known as Dahduli?
 [15] A: Yes.
 [16] Q: D-A-H-D-U-L-I?
 [17] A: I believe so.
 [18] Q: What was his position at IAP at the
 [19] time?
 [20] A: I remember his was office manager.
 [21] Q: Okay. Was Mr. Ahmad at IAP at the time?
 [22] A: Yes. Yes, he was.

1—10:33:38 22—10:34:24

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[1] Q: What position did he hold?
 [2] A: If I'm not forgetting, he was probably
 [3] the president.
 [4] Q: He was the president. Now, as the
 [5] spokesman, what was your responsibility, or public
 [6] relations person; what was your job?
 [7] A: Many. Reaching out to the larger
 [8] community and the Muslim community, giving
 [9] presentations and speeches.
 [10] Q: When you say larger community and Muslim
 [11] community, are you talking about two different
 [12] communities?
 [13] A: The wider American society and the
 [14] Muslim Arab community.
 [15] Q: Inside and outside, essentially? I mean
 [16] the inside Muslim community and the outside not
 [17] Muslim community.
 [18] A: Yes.
 [19] Q: To use a phrase in literature.
 [20] A: Yes.
 [21] Q: Now, in terms of doing your work, if you
 [22] were to go out and you were to make a statement or

1—10:34:27 22—10:35:14

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[1] issue a press release or come out with something in
 [2] public, did you have to have your statements or
 [3] releases approved by anyone?
 [4] MR. McMAHON: Nihad, before you answer
 [5] that question, there is an assumption that he's
 [6] issuing press releases and making all these
 [7] statements. I'd like you to develop that if you
 [8] want to ask him a specific question.
 [9] MR. LANDES: Fine.
 [10] BY MR. LANDES:
 [11] Q: All right. Did you in the course of
 [12] your work write press releases?
 [13] A: I don't remember writing press releases.
 [14] Q: Public statements, written public
 [15] statements?
 [16] A: I don't recall.
 [17] Q: Okay. What did you do?
 [18] A: Mainly going out, reaching out the
 [19] program.
 [20] Q: Made speeches?
 [21] A: Yes, working with low medias, and that
 [22] was my interest before joining IAP, public

1--10:35:19 22--10:36:23

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[1] relations, working in public relations, helping
[2] local communities in how to work with local media,
[3] reaching out to non-Muslims around the community.

[4] Q: So in a literal sense, you were a
[5] spokesman; you went out and spoke to people?

[6] A: I don't say spokesman because spokesman
[7] means you represent the organization in any sense.

[8] That was not my position.

[9] Q: So you were just acting for yourself?

[10] A: No. I was promoting the—working
[11] between the organization and the community, between
[12] the Muslim and Arab community and the larger
[13] society.

[14] Q: Were you promoting the purposes of IAP
[15] in doing this work?

[16] A: No. Promoting the larger cause of
[17] Palestine and Muslims and Arabs in the country.

[18] Q: Okay. At the time you took the job at
[19] IAP, what was your understanding of IAP's function?

[20] A: Cultural association.

[21] Q: How would you define cultural
[22] association?

1--10:36:24 22--10:37:16

Page 34

[1] A: Promoting and educating people about the
[2] Palestinian culture and issues.

[3] Q: Including political issues as well?

[4] A: The political issues were very diverse.

[5] Q: Diverse in what understand sense?

[6] A: Political spectrum.

[7] Q: IAP, I think, has had publicity. You
[8] can quarrel with me if I'm stating it wrong. It is
[9] said that it's the largest grass roots organization
[10] for Palestine in North America. Have you heard
[11] that?

[12] MR. McMAHON: I'm sorry. Are we in the
[13] '93-'94 time frame?

[14] MR. LANDES: '93-'94 time frame.

[15] THE WITNESS: I don't remember making
[16] that statement myself.

[17] BY MR. LANDES:

[18] Q: But did you ever hear that statement
[19] made by others?

[20] A: Maybe occasionally.

[21] Q: Okay. During the '93-94—

[22] A: I don't remember.

1--10:37:17 22--10:38:03

Page 35

[1] Q: All right. Would it be fair to say that
[2] the Islamic Association for Palestine held itself
[3] out in a general sense as an organization speaking
[4] for the Palestinian cause?

[5] A: No.

[6] Q: All right. Why am I wrong?

[7] A: Because there are many voices and many
[8] organizations.

[9] Q: It was not a spokesman for the Palestine
[10] cause?

[11] A: I don't believe so.

[12] Q: All right. So it was just a cultural
[13] organization?

[14] A: Well, it speaks about Palestine, but
[15] it's not the—

[16] Q: Okay. Was it was a—

[17] A: Spokesman. I believe it was a.

[18] Q: A spokesman for the Palestinian—

[19] A: I was an active organization, promoting
[20] Palestine culture and Palestinian issues.

[21] Q: And did it publish magazines and books
[22] and articles about the situations in Palestine?

1--10:38:06 22--10:38:57

Page 36

[1] MR. McMAHON: Are we still '93-'94?

[2] MR. LANDES: Yes, we are.

[3] THE WITNESS: It did publish newspapers.

[4] BY MR. LANDES:

[5] Q: All right. And did it have published
[6] press releases, statements, written statements, to
[7] the media?

[8] A: It may or it may have not.

[9] Q: Well, that's the question. Did it or
[10] didn't it?

[11] A: That was nine years ago.

[12] Q: Okay. Now, currently, just to put the
[13] frame, IAP has a very active service in which I
[14] think on a daily basis, I understand it, it
[15] publishes on its web page all types of
[16] announcements of news taking place in the Middle
[17] East; is that correct?

[18] A: I don't know.

[19] Q: You don't know?

[20] A: Yes. I don't know.

[21] Q: As you sit here today?

[22] A: Yes.

1—10:38:57 22—10:40:02

Page 37

[1] Q: Okay. So you don't know whether IAP
[2] ay publishes a web page and an E-mail service of
[3] saving out news?

[4] A: I don't receive any and I don't visit
[5] that web site that you talk about.

[6] Q: Okay. At the time when you worked there
[7] in 1993 to 1994, did it have an organized system of
[8] commenting publicly on events in the Middle East?

[9] A: Organized system? No. I don't think it
[10] was an organized system.

[11] Q: Was it disorganized? Was it an
[12] intermittent system? Did it have occasion to
[13] comment publicly on events in the Middle East?

[14] A: The organization was very small to my
[15] recollection with limited resources.

[16] Q: So when you went out to be the
[17] spokesman, what was the purpose of being the
[18] spokesman, more specifically?

[19] A: My main interest had been, before
[20] joining the IAP, is to promote a better
[21] understanding of Islam, Muslims, and Arab issues in
[22] the American society, and probably that was the

1—10:40:05 22—10:41:00

Page 38

[1] reason IAP want me to join them.

[2] Q: Typically, when you went out, were you
[3] identified as somebody from IAP?

[4] A: Yes, for that particular year.

[5] Q: Yes. I'm asking about the year when you
[6] worked there.

[7] A: Yes. Yes.

[8] Q: So when you went out and say you were
[9] going to go out and meet the press on some issue or
[10] going to speak in a community, did you have to
[11] report to anyone wherein IAP as to what you were
[12] going say and what you were going to do?

[13] A: Occasionally to the office manager.

[14] Q: Now, did he cover the substance of your
[15] remarks with you in advance or were you free to
[16] offer whatever comments you wished on your own?

[17] A: I was given the freedom.

[18] Q: Now, did you have any formal training in
[19] public relations before you took this job?

[20] : I attended seminars. It's my nature and
[21] inclination and instinct, public relations.

[22] Q: So public relations essentially followed

1—10:41:02 22—10:41:45

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[1] your personality, you would say?

[2] A: Yes.

[3] Q: You're an outgoing personal, articulate
[4] personal; that's your view of yourself?

[5] A: Correct.

[6] Q: Therefore you felt suited for this job?

[7] A: Yes.

[8] Q: All right. Now, had you to take this
[9] job undertaken any formal education on, say, the
[10] history, the culture, the politics of the Middle
[11] East?

[12] A: My own readings and attending some
[13] classes here and there.

[14] Q: Where were those classes?

[15] A: At the university.

[16] Q: At Minnesota?

[17] A: Yes.

[18] Q: At that time, were you—did you make it
[19] a practice to stay up to date on developments in
[20] the Middle East?

[21] A: To a larger extent, yes.

[22] Q: And you read the press in Arabic and in

1—10:41:49 22—10:42:38

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[1] English, I assume?

[2] A: Mainly in English.

[3] Q: But you had access to Arabic
[4] publications as well?

[5] A: Not much.

[6] Q: But some?

[7] A: Very little.

[8] Q: At the time that you took this position
[9] with IAP, were you at that time a member of any
[10] other organizations?

[11] A: Yes, I was.

[12] Q: Which were those?

[13] A: The Muslim Student Association and the
[14] General Union of Palestinian Students.

[15] Q: So the first one is? I'm sorry.

[16] A: The Muslim Students Association.

[17] Q: And what kind of organization is that?

[18] A: That's a student organization on campus.

[19] Q: And when did you join that organization?

[20] A: I don't remember exactly when.

[21] Q: Sometime when you were an undergraduate?

[22] A: During my studies at the university.

1—10:42:41 22—10:43:21

Page 41

- [1] Q: And who sponsors the Muslim Student
[2] Organization?
- [3] A: It's a nationwide student movement since
[4] the sixties.
- [5] Q: And what's the purpose of that
[6] organization?
- [7] A: To have and help Muslim students on
[8] campus and educate the student community about
[9] Islam and Muslim issues.
- [10] Q: So that means Islam in the religious
[11] sense?
- [12] A: Yes.
- [13] Q: And political as well?
- [14] A: Yes, in a way.
- [15] Q: Okay. And what was the second
[16] organization?
- [17] A: The General Union of Palestine Students.
- [18] Q: When did you join that organization?
- [19] A: I don't remember exactly when, but
[20] almost around the same time.
- [21] Q: So there were two separate
[22] organizations?

1—10:43:21 22—10:44:00

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- [1] A: Yes.
- [2] Q: Now, do they have separate sponsorship?
- [3] A: Yes.
- [4] Q: They're national organizations?
- [5] A: In a way they are local chapters, but
[6] part of national organizations.
- [7] Q: You were at the University of Minnesota.
[8] If I went, say, to Duke University or New York
[9] University, I could find chapters of both of those
[10] organizations?
- [11] A: It depends on the presence of the
[12] community there.
- [13] Q: Well, other large schools had it?
- [14] A: Probably.
- [15] Q: Was there a national structure to these
[16] organizations?
- [17] A: Yes, there was.
- [18] Q: I think you once commented, and we can
[19] get to the document later, that the General Union
[20] of Palestinian Students was affiliated with the
[21] PLO. Is that correct?
- [22] A: Politically.

1—10:44:01 22—10:44:40

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- [1] Q: Was it sponsored by them financially?
- [2] A: No.
- [3] Q: It essentially followed the PLO line; is
[4] that a fair statement?
- [5] MR. BOYD: Objection.
- [6] MR. McMAHON: Can we have a time frame
[7] here?
- [8] MR. LANDES: At the time he was a
[9] member.
- [10] MR. McMAHON: When did you cease being a
[11] member of this organization?
- [12] THE WITNESS: It was a student movement.
[13] I think it reflected views of the secular
[14] Palestinian factions.
- [15] BY MR. LANDES:
- [16] Q: Okay. Was the Muslim Student
[17] Association a nonsecular organization?
- [18] A: It was religious.
- [19] Q: Okay. So one was secular and one was
[20] religious?
- [21] A: Correct.
- [22] Q: And you were a member of both?

1—10:44:41 22—10:45:28

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- [1] A: Yes.
- [2] Q: Were you a member of any other
[3] organizations at the time you joined IAP?
- [4] A: I was a member of the Islamic Center.
- [5] Q: What is the Islamic Center?
- [6] A: The main Islam Center in Minnesota.
- [7] Q: Is that the mosque?
- [8] A: Yes.
- [9] Q: Is that part of the—my understanding is
[10] that mosques in the United States are part of a
[11] greater organization. Is that correct?
- [12] MR. McMAHON: Are we talking today?
- [13] THE WITNESS: Repeat the question,
[14] please.
- [15] BY MR. LANDES:
- [16] Q: My understanding today is that for some
[17] period of time, the mosques are part of a larger
[18] organization, that each mosque is—there's a
[19] national organization of mosques. Is that correct?
- [20] A: No.
- [21] Q: Okay. So the mosque you were a member
[22] of was the mosque in Minnesota?

1—10:45:30 22—10:46:30

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1) A: Correct.

2) Q: And when you came to Richardson, Texas,

3) I assume you joined a different mosque.

4) A: Just by being in the congregation?

5) Q: By attending?

6) A: Not maybe a membership. I don't

7) remember.

8) Q: Okay. Now, during the period of

9) time—let me just also say that at any time if you

10) need to take a break to go to the facilities or

11) anything else, just let me know. We'll create

12) space for that.

13) You said in your testimony you went out

14) and made speeches at the time you were public

15) relations director of IAP. In fact, one of those

16) talks you gave was at Barry University; is that

17) correct?

18) A: Correct.

19) Q: And that was in 1994?

20) A: I'm not sure exactly.

21) MR. LANDES I'm going to show you a tape

22) on television and ask you just to identify whether

1—10:46:33 22—10:47:47

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1) you, in fact, spoke at a conference in 1994 at

2) Barry University. Let me give you a document you

3) can look at while we're cuing up the tape. I'll

4) ask that this be marked.

5) [Awad Exhibit No. 3 was

6) marked for identification.].

7) MR. McMAHON: In terms of a foundation,

8) would you tell me who prepared this tape? Where

9) did you source it from?

10) MR. LANDES: I'm going to ask him if he

11) sees the tape, if this is him speaking on the tape.

12) MR. McMAHON: I'd like to know where you

13) got the tape. What's the source of the tape?

14) MR. LANDES: I'm not going to tell you.

15) MR. McMAHON: Why not?

16) MR. LANDES: Because it's not my

17) deposition.

18) MR. McMAHON: Well, you want us to look

19) at a film.

20) MR. LANDES: Right

21) MR. McMAHON: And you're not willing to

22) tell us what the source of that film is—

1—10:47:47 22—10:48:28

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1) MR. LANDES: That's right.

2) MR. McMAHON: —how you got possession

3) of that?

4) MR. LANDES: That's right.

5) MR. McMAHON: And you're not willing to

6) tell us how you got this transcript here?

7) MR. LANDES: No.

8) MR. McMAHON: Okay. And the reason is?

9) MR. LANDES: I don't have to. I'm not

10) going to tell you because it's not my deposition.

11) I'm going to ask the witness to look at—first to

12) look at the document and ask if he recalls making

13) these remarks at Barry University in March of 1994,

14) and then he's going to tell me whether he remembers

15) that or not. If he doesn't, we'll show him the

16) tape, and he can sit and look at the tape and read

17) the transcript and tell me if it's accurate, tell

18) me whether it's him on the tape or not.

19) MR. McMAHON: And can you please proffer

20) why whether or not he made these statements at

21) Barry University has any relevancy to this lawsuit?

22) MR. LANDES: You know, Mr. McMahon,

1—10:48:30 22—10:49:14

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1) you're not a—you know, you're a third-party

2) witness. You're not a counsel in this lawsuit. He

3) was a spokesman for IAP at a time that is essential

4) in this lawsuit. Okay?

5) MR. McMAHON: Why is the '93-'94 time

6) frame essential in your lawsuit?

7) MR. LANDES: You know, I'm not going to

8) answer the question, and I am not going to sit here

9) and have you question me as to the merits of this

10) lawsuit. Okay? The witness made a statement.

11) It's within the time zone covered by the lawsuit.

12) Okay? Let him answer the questions.

13) If you have a problem with it, you know,

14) we can call the judge and we can deal with it.

15) MR. McMAHON: I'm not questioning the

16) merits of your lawsuit. What I am questioning is

17) that this is at best an attenuated witness to any

18) of the allegation pertaining to your lawsuit.

19) MR. LANDES: Well, I don't think you're

20) very familiar with the lawsuit, and I don't

21) really—

22) MR. McMAHON: And you're not willing to

1—10:49:15 22—10:51:08

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[1] familiarize me with the lawsuit?
[2] **MR. LANDES:** I will tell you I have,
[3] quite frankly, never been in a situation where
[4] we've taken a third-party witness where it's turned
[5] into an examination of the lawyer. This lawsuit,
[6] Mr. McMahon, is a very well-known lawsuit. It's
[7] reported in the Seventh Circuit Court of Appeals.
[8] It has a caption. You could have looked it up.
[9] You could have studied it. You could have looked
[10] at the record. I know you've talked to Mr. Boyd.
[11] I'm sure you had every opportunity to make that
[12] decision.
[13] If you felt your witness was not a part
[14] of this, you could have filed a motion to quash and
[15] so on. You didn't do it. So let me ask the
[16] witness the questions.
[17] **MR. McMAHON:** Please proceed.
[18] **MR. LANDES:** Okay.
[19] [Witness peruses exhibit.]
[20] **MR. McMAHON:** Just don't mark on that.
[21] **THE WITNESS:** I can't mark on it?
[22] **MR. LANDES:** No. We can give you an

1—10:51:09 22—10:53:57

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[1] extra copy if you'd like to mark on it. Here's
[2] counsel's copy. Let him hold on to that one. That
[3] one goes back to the record, goes to the court
[4] reporter.
[5] **MR. McMAHON:** I think he's going to ask
[6] you questions about that.
[7] [Witness further peruses exhibit.]
[8] **MR. BOYD:** Steve, before you go ahead, I
[9] will put in my two cents and say that I do think
[10] that any evidence such as this that predates the
[11] identification of Hamas as a terrorist organization
[12] is genuinely completely irrelevant to this lawsuit.
[13] **MR. LANDES:** I know that's your theory
[14] of the lawsuit, Mr. Boyd, but I think that—
[15] **MR. BOYD:** I'm just making my objection,
[16] Steve. I don't want to engage in a colloquy.
[17] **MR. LANDES:** We've had this—we'll have
[18] this argument also in front of the judge. Okay?
[19] **MR. BOYD:** I'm just putting my objection
[20] on the record, Steve.
[21] **MR. LANDES:** All right.
[22] **BY MR. LANDES:**

1—10:53:58 22—10:54:58

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[1] **Q:** Mr. Awad, do you remember speaking at
[2] Barry University?
[3] **A:** Yes.
[4] **Q:** Does this document appear to be an
[5] accurate transcript of your remarks?
[6] **A:** This is—I don't remember everything
[7] here, of course. So it was nine years ago
[8] apparently.
[9] **Q:** All right. But does it appear familiar
[10] to you, sir?
[11] **A:** Yes.
[12] **Q:** All right.
[13] **A:** I'm not sure of every point here.
[14] **Q:** Well, we can take the time and run the
[15] tape and you can follow this if you'd like.
[16] **A:** Okay.
[17] **Q:** Okay. First of all, it's correct, isn't
[18] it, that when you spoke there, you were identified
[19] as being with IAP; is that correct?
[20] **A:** I don't remember.
[21] **MR. LANDES:** Why don't we show you this
[22] tape?

1—10:55:01 22—11:01:01

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[1] [Video presentation.]
[2] **BY MR. LANDES:**
[3] **Q:** Do you recall—that's you on the tape,
[4] isn't it?
[5] **A:** Yeah. It looks like it.
[6] **Q:** And you recall being introduced now at
[7] this meeting; is that correct?
[8] **A:** Yeah.
[9] **Q:** You have no reason to doubt the
[10] authenticity of that tape?
[11] **A:** It's the first time I see it. So I have
[12] to see probably the entire thing to make sure.
[13] **Q:** Is there anything offhand that strikes
[14] you as being not consistent with your recollection
[15] of the events?
[16] **A:** I don't remember everything, of course,
[17] there, but you asked me to comment.
[18] **Q:** Now, I will show you the tape which
[19] you're making the speech, and you can follow.
[20] Go ahead.
[21] [Video presentation.]
[22] **BY MR. LANDES:**

1—11:01:01 22—11:01:42

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[1] Q: Now, you've looked at the tape, and
[2] 's yourself speaking on the tape; is that
[3] correct?

[4] A: Yes.

[5] Q: And you've looked at this transcript.
[6] Correct?

[7] A: Yes.

[8] Q: And this a transcript appears, I would
[9] say with maybe one or two slight grammatical
[10] issues, to be about 99 percent accurate. Would you
[11] agree with that?

[12] A: Yes.

[13] Q: There's nothing substantively inaccurate
[14] about this translation; is that correct?

[15] A: No.

[16] Q: This transcription. I'm sorry.

[17] A: No.

[18] Q: Now, you said that you had conducted an
[19] investigation to reach the conclusion that you
[20] favor Hamas over the PLO; is that correct?

[21] A: Research.

[22] Q: Well, research, you said as a

1—11:01:43 22—11:02:38

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[1] journalist. Right?

[2] A: Yes. My personal capacity.

[3] Q: And you said you talked to people there?

[4] A: That was said in the tape.

[5] Q: Did you, in fact, talk to people?

[6] A: I don't remember how it was. Maybe
[7] speakers who came and visited then and I
[8] interviewed them for my personal interest and
[9] publications on campus.

[10] Q: Now, you said that you left Jordan in
[11] 1984; is that correct?

[12] A: Yes.

[13] Q: Since 1984 did you have occasion to
[14] return to Israel or occupied territories at all?

[15] A: I just did once.

[16] Q: When was that?

[17] A: I'm not sure. '91.

[18] Q: Before you made this speech?

[19] A: Yes.

[20]): Okay. And when you were there, where
[21] were you? Did you go throughout the occupied
[22] territories?

1—11:02:39 22—11:03:10

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[1] A: No.

[2] Q: Were you in Gaza?

[3] A: No.

[4] Q: Where were you?

[5] A: I visited my sister.

[6] Q: Where was she?

[7] A: Ramallah.

[8] Q: So did you—you just went to Ramallah;
[9] you didn't go, say, to Gaza during that trip.

[10] A: Never.

[11] Q: Never been there?

[12] A: Never in my life.

[13] Q: Okay. Have you been to Nablus?

[14] A: Never.

[15] Q: Been to Janin?

[16] A: Bethlehem?

[17] A: Never.

[18] Q: So you really never did any on the
[19] ground research when you made this statement;
[20] didn't reflect being actually in the territories
[21] themselves?

[22] A: I visited my family.

1—11:03:14 22—11:03:48

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[1] Q: Except for Ramallah?

[2] A: And Jerusalem, of course.

[3] Q: And in Jerusalem. East Jerusalem?

[4] A: I don't know the geography very well.

[5] Q: Well, let's say—

[6] A: I went to—

[7] Q: Okay. So the old city?

[8] A: Yes.

[9] Q: But you were , in fact, in Ramallah?

[10] A: Yes.

[11] Q: And when you were there, did you talk to
[12] the people from the Islamic movement?

[13] A: Just people in the mosque.

[14] Q: Okay.

[15] MR. McMAHON: Can you define what the
[16] Islamic movements is at that time?

[17] MR. LANDES: Well, the witness
[18] understood was I was saying. The witness talked
[19] about there being a sort or secular or Palestinian
[20] movement and Islamic movement. I think the witness
[21] understands the question.

[22] BY MR. LANDES:

1--11:03:48 22--11:04:33

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[1] Q: You understand the question when I say
[2] Islamic movement, don't you?

[3] A: When I say the Islamic movement?

[4] MR. McMAHON: He used the term "Islamic
[5] movement" in his question, and my question is do
[6] you understand what he's making a reference to as
[7] the Islamic movement?

[8] THE WITNESS: Now, when I say Islamic
[9] movement, I mean people who practice Islam and they
[10] consider themselves active.

[11] BY MR. LANDES:

[12] Q: Okay. Now, you made a distinction
[13] before, secular Palestinians. Correct?

[14] A: Right.

[15] Q: And you consider them part of the
[16] Islamic movement?

[17] A: No.

[18] Q: Okay. Now, in making the statement that
[19] you made a Barry University—

[20] A: Yes.

[21] Q: —you say in it that Hamas is
[22] destructive and involved in violence.

1--11:04:39 22--11:06:20

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[1] A: No, I did not say that. I said—

[2] Q: Doesn't it say that? "I'm in support of
[3] Hamas movement more than the PLO, not because Hamas
[4] is destructive and involved in violence." Isn't
[5] that a statement at Hamas at that time was involved
[6] in violence?

[7] A: When I made that statement, it was, as
[8] you can tell, in response to a question from the
[9] floor. That was made in an academic and
[10] intellectual setup at the university. I was making
[11] a reflection on an impression that I have over that
[12] movement compared to the PLO. Then that
[13] organization was gaining popularity among the
[14] Palestinians in general for providing educational
[15] social services, and it was gaining momentum and
[16] popularity.

[17] It has not attacked civilians then, and
[18] it was not designated by the United States
[19] Government as a terrorist organization. Therefore,
[20] it was not a controversial statement to make in
[21] that time in 1994 or '93-'94. Former Presidential
[22] Candidate Michael Dukakis spoke at the conference.

1--11:06:24 22--11:07:38

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[1] I personally and my organization have condemned
[2] Hamas when they started attacking Israeli
[3] civilians. And that's my personal view. It is
[4] obvious also from this statement that I encourage
[5] people to look at ways that will lead to peace and
[6] to ignore the extremists and to look at the
[7] moderates.

[8] That was nine years ago. It was an
[9] innocuous statement and should not be
[10] misinterpreted or misused.

[11] Q: I understand that, Mr. Awad. I'm not
[12] trying to read anything into your remarks. All I'm
[13] trying to do is just try to understand what you
[14] were saying. Okay? And the only question I have
[15] is you said—and let's go back to the quote: "Not
[16] because Hamas is destructive and involved in
[17] violence." My question for you is not that a
[18] recognition that at the time you made the speech,
[19] that Hamas had taken credit for acts of violence?

[20] MR. BOYD: Object to the form of the
[21] question.

[22] MR. LANDES: Read it back.

6--11:07:56 22--11:08:57

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[1] [Whereupon, the pending question was
[2] read back by the court reporter.]

[3] MR. BOYD: Okay. What I objected to was
[4] the prefatory monologue.

[5] MR. LANDES: Well, then I will restate
[6] the question so there is no objection.

[7] BY MR. LANDES:

[8] Q: At the time you made the statement in
[9] March of 1994, is it not true that Hamas had
[10] already taken public credit for acts of violence in
[11] either Israel or the occupied territories?

[12] A: I was not aware of any, and that's why
[13] in that statement it was very clear that I was
[14] looking at the intellectual, social, and academic
[15] services that that movement has given to the
[16] Palestinians in comparison to the PLO, and that's
[17] why people like myself at that time had positive
[18] impressions of that organization, because it was
[19] less corrupt than the PLO.

[20] Q: Okay. My question is a simple question,
[21] and obviously in 1994 there was a—just to set a
[22] context, let me back up. Isn't it true 1994 was a

1—11:09:01 22—11:09:55

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[1] year after the Oslo Accords were signed?

[2] **A:** Yes.

[3] **Q:** In fact, when you had the introduction
[4] that was given to being on the panel, that was the
[5] background for your speech. Mr. Sabri was going to
[6] talk, apparently, in favor of the PLO's view on the
[7] Oslo Accords, and you were going to provide some
[8] commentary not necessarily in opposition, but
[9] different than Mr. Sabri's line; is that correct?

[10] **A:** I don't remember exactly what he said
[11] and what I said.

[12] **Q:** All right. But you heard the
[13] introduction?

[14] **A:** Yes.

[15] **Q:** And at the time, you didn't say, Hey,
[16] that's not what I came to do?

[17] **A:** I don't see—I don't remember if I
[18] objected or not.

[19] **Q:** Okay.

[20] **A:** But my statement was very clear. It was
[21] very balanced, and I look at it in nine years
[22] later. It was very balanced, very objective in an

1—11:09:59 22—11:10:55

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[1] intellectual and academic setting, recognizing the
[2] importance of working with for peace and also
[3] recognizing that the organization was not involved
[4] in attacks on civilians and was not designated by
[5] the United States Government as a terrorist
[6] organization.

[7] **Q:** But you didn't know in 1994 that in 1995
[8] they were going to be designated as a terrorist
[9] organization?

[10] **A:** I'm sorry?

[11] **Q:** You obviously couldn't know, right, in
[12] 1994 that a year later they would be designated as
[13] a terrorist organization. Right? You couldn't
[14] know that?

[15] **A:** I don't know how to answer your
[16] question.

[17] **Q:** I'm just saying—it was a rhetorical
[18] question, but you couldn't know that, but that not
[19] what I'm asking you. I'm just asking you when you
[20] le this one statement, "Not because Hamas is
[21] uestructive and involved in violence", what was the
[22] basis of that statement? What were you referring

1—11:10:58 22—11:12:07

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[1] to? And I'm not questioning the balanced nature of
[2] your commentary. I'm not quarrelling with that,
[3] and, you know, you're a defendant here. What I'm
[4] trying to ask you is what was your knowledge in
[5] 1994 as to what Hamas had claimed it did with
[6] respect to violence and destruction?

[7] **A:** Sir, you're asking me about nine years
[8] ago.

[9] **Q:** Right.

[10] **A:** And I don't have recollection of
[11] specific events except that statement, it was very
[12] clear that it was balanced within the expectations
[13] of people, and it was innocuous. Nine years later,
[14] I look at it and I thought it was a very balanced
[15] statement coming from a person like me.

[16] **Q:** A person like you who was a spokesman
[17] for IAP?

[18] **A:** A person who is a Muslim and was a
[19] Palestinian and an American citizen.

[20] **Q:** But what you're telling me is, though,
[21] you cannot shed any more light on this statement?
[22] When I ask you "not because Hamas is destructive

1—11:12:10 22—11:13:13

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[1] and involved in violence", you're telling me that
[2] you made this statement, but you can't recall
[3] whether there were any facts that supported your
[4] saying that Hamas is destructive and involved in
[5] violence?

[6] **A:** If people then had criticism of Hamas, I
[7] did not oppose to that. That was very obvious in
[8] my statement.

[9] **Q:** All right.

[10] **A:** I wanted just to shed light on other
[11] aspects that people should learn in an academic
[12] setting.

[13] **Q:** Now, you said just, and just to be
[14] clear, that Hamas wasn't listed as a specially
[15] designated terrorist organization until 1995, but
[16] the State Department had as early as 1991 listed
[17] Hamas as an organization engaged in terrorist acts;
[18] isn't that correct?

[19] **A:** I did not know.

[20] **Q:** You didn't know that at the time?

[21] **A:** No.

[22] **MR. McMAHON:** What's your source for

1--11:13:14 22--11:14:07

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[1] that statement? I'm asking you what is the source
[2] of that statement that the State Department had—
[3] **MR. LANDES:** The State Department had
[4] publications, and we can produce that at the
[5] appropriate time if people in the lawsuit want to
[6] see it. I'm sure they know about. I just asked
[7] the witness if he knew about it. Apparently he
[8] didn't.

BY MR. LANDES:

[9] **Q:** Have you ever seen a publication by the
[10] State Department called "Patterns of Global
[11] Terrorism", either the 1991, 1992, or 1993
[12] editions?
[13]

[14] **A:** No, I did not.

[15] **Q:** So when you made that statement, you
[16] weren't referring to that State Department
[17] publication?

[18] **A:** No.

[19] **Q:** Now, when you reached what you say is a
[20] balanced presentation in 1994 in this talk between
[21] Hamas and the PLO, had you had occasion at that
[22] time to become familiar with the Hamas Covenant?

1--11:14:12 22--11:15:03

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[1] **A:** No.

[2] **Q:** You hadn't read it?

[3] **A:** No.

[4] **Q:** Have you ever read it?

[5] **A:** No.

[6] **Q:** Your testimony is you've never read the
[7] Hamas Covenant?

[8] **A:** Yes. I never read it .

[9] **Q:** So did you feel, then, it was
[10] appropriate for you to make an evaluation of how to
[11] balance Hamas and PLO without looking at their own
[12] public statements of what they stood for?

[13] **A:** I was referring to my impressions at the
[14] time.

[15] **Q:** Now, you're aware, aren't you, that the
[16] Islam Association for Palestine had itself
[17] published the Hamas Covenant, aren't you?

[18] **A:** I did not know that.

[19] **Q:** You didn't know that?

[20] **A:** No.

[21] **Q:** No one ever told you that when you were
[22] working there?

1--11:15:03 22--11:16:18

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[1] **A:** No.

[2] **MR. LANDES:** Let me hand you a document.
[3] I've have it re-marked. It was actually introduced
[4] at Mr. Ahmad's deposition as 11, but it will be 4.

[5] [Awad Exhibit No. 4 was
[6] marked for identification.]

[7] **BY MR. LANDES:**

[8] **Q:** Have you seen this document before?

[9] **A:** No.

[10] **Q:** Never seen it?

[11] **A:** No.

[12] **Q:** Let me hand you—I'm not putting it in
[13] the record. I'll save this for the trial, but this
[14] pamphlet, which this is a xerox of, appears to be
[15] the same document. Correct?

[16] **A:** Yes.

[17] **Q:** Now, take a look what would be in yours
[18] the second to the last—well, you can just look
[19] through this if you like. Take some time.

[20] **MR. McMAHON:** Is there an English
[21] translation available of this document?

[22] **MR. LANDES:** We're coming out with that

1--11:16:21 22--11:17:34

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[1] next.

[2] **THE WITNESS:** What do you want me to
[3] look at?

BY MR. LANDES:

[4] **Q:** Just does this appear to you to be the
[5] Hamas Covenant? I know you haven't seen it before,
[6] but does this seem to be a document that talks
[7] about Hamas' position?
[8]

[9] [Witness peruses document.]

[10] **MR. McMAHON:** Before you answer the
[11] question, could I have that last question read
[12] back, please?

[13] [Whereupon, the pending question was
[14] read back by the court reporter.]

[15] **BY MR. LANDES:**

[16] **Q:** Can you answer the question?

[17] **MR. McMAHON:** Well, you reference the
[18] Hamas position and the Hamas Covenant, and it's a
[19] little confusing.

[20] **MR. LANDES:** All right. Then I'll
[21] restate the question.

[22] **BY MR. LANDES:**

[1] Q: Does this document appear to you to be a
[2] element of Hamas policy?

[3] A: I did not read it.

[4] Q: You don't know?

[5] A: No.

[6] Q: Take a look at the second to the last
[7] page, I guess, of the xerox copy that you have. I
[8] think it's stamped—well, it's the third from the
[9] last, and you—the one before that, sir—and that
[10] corresponds to this pamphlet also right here. Do
[11] you see that?

[12] A: Um-hum.

[13] Q: Now, this does list a number of
[14] addresses of IAP, does it not?

[15] MR. McMAHON: Excuse me. Do you have a
[16] year for this document, this pamphlet?

[17] MR. LANDES: All right. Fine. We can
[18] ask the witness. The witness can look at the front
[19] page.

[20] BY MR. LANDES:

[21] Q: Do you see a date on the bottom in
[22] Arabic?

[1] A: Yes.

[2] Q: And it's the English date?

[3] A: Excuse me?

[4] Q: It has the English date as well in
[5] Arabic?

[6] A: I don't see an English date.

[7] Q: The last line. No?

[8] A: It's only Arabic.

[9] Q: What does it say on the last line all
[10] the way on the bottom?

[11] A: It says August 18th.

[12] Q: All right. Does it give a year?

[13] A: '88.

[14] Q: So it does have a date?

[15] A: Yes.

[16] Q: Okay. So it's August 18, 1988, and it
[17] has the Islamic date as well, correct, above it?

[18] A: Yes.

[19] Q: What is that?

[20] A: First Maharum, 1409.

[21] Q: Do you want to spell that for the court
[22] reporter?

[1] A: First Maharrum. You write it as it
[2] sounds. My spelling is as good as yours when it
[3] comes to—

[4] Q: Okay. Well, she has to write it down.
[5] So we have to help here.

[6] A: Yes. Maharrum, I don't know how—

[7] Q: M-A-H-A-R-U-M? How about this:
[8] M-U-H-A-R-R-A-M?

[9] A: Yes.

[10] Q: That's it. All right. So it's your
[11] testimony you've never seen this document in any
[12] form; you've never read the Hamas Covenant; is that
[13] your testimony?

[14] A: Yes.

[15] MR. LANDES: Let me show you a document
[16] in English and ask this be marked as No. 5.

[17] [Awad Exhibit No. 5 was
[18] marked for identification.]

[19] MR. McMAHON: Can you make a statement
[20] on the report as to what this is vis-a-vis the
[21] Exhibit No. 11 from the Ahmad deposition?

[22] MR. LANDES: Now, this exhibit, you can

[1] actually look down at the bottom to satisfy
[2] yourself, Mr. McMahon. It says source. It's
[3] from a website at Cornell University. It says on
[4] the top, the first, of the Covenant of the Islamic
[5] Resistance Movement, Hamas Palestine. If you look
[6] at the second to the last page, it purports to be a
[7] verbatim reproduction of the Palestine Hamas
[8] Movement's own English version of its covenant.
[9] The paginations and line divisions are the same as
[10] in the original.

[11] BY MR. LANDES:

[12] Q: Have you ever seen this document before
[13] in any form?

[14] A: No.

[15] Q: If you look at the second to the last
[16] page, have you ever seen these symbols, these logos
[17] that are here before? Page 20 of 21 of the
[18] document.

[19] A: Well, in some newspapers.

[20] Q: You don't know what these two
[21] organizations, these represent?

[22] A: It's the logo of Hamas.

1—11:21:50 22—11:22:25

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[1] Q: What is it? The one on the left is
[2] what?
[3] A: The left?
[4] Q: Yes. Do you know?
[5] A: Do I know it?
[6] Q: Could the one of the left be the Muslim
[7] Brotherhood's logo?
[8] A: I don't know.
[9] Q: You don't know. What about the one on
[10] the right?
[11] A: I don't know either.
[12] Q: You don't know either one of these?
[13] A: No.
[14] Q: Never seen these before?
[15] A: Well, maybe in some newspapers.
[16] Q: But not enough to make an impression on
[17] you?
[18] A: Not necessarily.
[19] Q: You're not familiar with them? Can you
[20] read the Arabic in the banner part of the one on
[21] the right?
[22] A: Yes, I can.

1—11:22:28 22—11:23:15

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[1] Q: And what does it say?
[2] [Witness speaks in Arabic.]
[3] BY MR. LANDES:
[4] Q: What is that? Is that the Hamas name?
[5] A: Yes.
[6] Q: Now, is it your testimony you've never
[7] read the—I mean you did testify that you've never
[8] read the Hamas Covenant in English either?
[9] A: Correct.
[10] Q: Have you ever been in a situation where
[11] people have gone to any intellectual or any
[12] speeches where people have tried to explain to you
[13] what the Hamas Covenant stood for?
[14] A: No.
[15] MR. McMAHON: This is at any time?
[16] MR. LANDES: Yeah, at any time.
[17] THE WITNESS: No.
[18] BY MR. LANDES:
[19] Q: So if I were to ask you about certain
[20] positions Hamas has taken in its covenant, this
[21] would come as something you're hearing for the
[22] first time from me?

1—11:23:16 22—11:25:10

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[1] A: Probably.
[2] Q: So if you were to look—let's see—at
[3] Article 11 on page 6 of 21.
[4] A: Which page?
[5] Q: Page 6 of this document. You see it's
[6] up in the upper corner? It's says—
[7] A: Yes.
[8] Q: You want to take a look and read Article
[9] 11?
[10] MR. McMAHON: Do you want him to read
[11] the entire article?
[12] MR. LANDES: The article is—yes. He
[13] can read it. It's less than a full page.
[14] [Witness peruses exhibit.]
[15] THE WITNESS: The whole thing?
[16] BY MR. LANDES:
[17] Q: Well, why don't you just—you can read
[18] the first paragraph. You know, it flips after the
[19] 10, and then it goes to—the paragraph says: "This
[20] is the law governing the land of Palestine."
[21] A: Okay. I read the first part.
[22] Q: Okay. You've seen the part "This is the

1—11:25:11 22—11:26:11

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[1] law governing the land of Palestine in the Islam
[2] Sharia, and the same goes for any land the Muslims
[3] have conquered by force"; do you see that?
[4] A: You mean below?
[5] Q: This.
[6] A: Okay.
[7] Q: Okay?
[8] A: Yes.
[9] Q: Now, have you ever seen that expression
[10] of opinion before?
[11] MR. McMAHON: Can you be more specific?
[12] Which paragraph?
[13] MR. LANDES: I told him. I asked him to
[14] look at the first two paragraphs. He said he
[15] looked at the first two paragraphs of Article 11 on
[16] page 6 of 21.
[17] MR. McMAHON: Okay. Does the second
[18] paragraph end "the day of judgment"?
[19] MR. LANDES: Yes.
[20] MR. McMAHON: Okay.
[21] BY MR. LANDES:
[22] Q: Have you looked at that?

1—11:26:13 22—11:27:04

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[1] **A:** I see it.

[2] **Q:** What does that mean? What's your
[3] expression of what this means?

[4] **MR. BOYD:** Objection to form.

[5] **THE WITNESS:** Can you be more specific?

[6] **BY MR. LANDES:**

[7] **Q:** Okay. Let me say this to you: Doesn't
[8] it seem to say that Hamas believes that Palestine,
[9] it says, is an Islamic wok consecrated for future
[10] Muslim generations; is that correct?

[11] **A:** That's what it says.

[12] **Q:** What does that mean in your knowledge as
[13] a person with some background in Islamic history
[14] and war?

[15] **A:** It means what it means.

[16] **Q:** All right. Would it be fair to say that
[17] Palestine should be an Islamic state?

[18] **A:** I don't see it there.

[19] **Q:** Okay. What does it mean to you to be a
[20] Islamic wok consecrated for future Muslim
[21] generations until judgment day; what does that
[22] mean?

1—11:27:06 22—11:27:55

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[1] **A:** I'm not a theologian.

[2] **Q:** So you don't know?

[3] **A:** No.

[4] **Q:** Okay. So look at the second paragraph.
[5] **It says:** "This is the law governing the land of
[6] Palestine in the Islamic Sharia law, and the same
[7] goes for any land the Muslims have conquered by
[8] force." Is says: "During the times of Islamic
[9] conquest, the Muslims consecrated these lands to
[10] Muslim generations until the day of judgment."
[11] Now, as a person who doesn't pretend to be an
[12] expert on this, it seems to me that it says that
[13] any lands that have ever been conquered by Muslims
[14] are forever Islamic lands. Does that seem to be a
[15] fair statement of what this says?

[16] **A:** That's your explanation.

[17] **Q:** Does its seem fair to you? You don't
[18] know?

[19] **A:** I'm not interested in explaining things
[20] t are written beyond—

[21] **Q:** Fine.

[22] **MR. BOYD:** I just want to—I'm sorry. I

1—11:27:57 22—11:28:47

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[1] didn't mean to interrupt you. I thought you were
[2] through. I just want to interject an objection for
[3] the record. You're asking this man who obviously
[4] has no expert opinion about this opinion questions
[5] about the meaning of the charter of whatever this
[6] is of Hamas, and just as a litigant who is spending
[7] time in this, I object. I think you've gone far
[8] beyond the scope of discovery. This man hasn't
[9] been qualified as an expert. Your questioning of
[10] him has nothing to do with this lawsuit. I object.

[11] **MR. LANDES:** I'm going to finish this in
[12] a second.

[13] **BY LANDES:**

[14] **Q:** I'm just going to ask you now, you've
[15] read this and you—

[16] **MR. McMAHON:** I'm sorry. I'm going to
[17] note a somewhat similar objection. I was going to
[18] say this before. That second paragraph or anything
[19] in the first paragraph, how does that have any
[20] relevancy to this witness in terms of your lawsuit?
[21] I don't see it.

[22] **MR. LANDES:** Fine. You don't have to

1—11:28:48 22—11:29:42

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[1] see it.

[2] **BY MR. LANDES:**

[3] **Q:** But let me just say that having seen
[4] this and having made the comment that you support
[5] Hamas PLO, does this cause you now to question
[6] whether you did a thorough enough examination to
[7] reach that conclusion?

[8] **MR. BOYD:** I object to the form of that
[9] question because I think you're mischaracterizing
[10] the witness' testimony. The statement as you
[11] produced it to him is very careful to say that he's
[12] in favor of democracy, that he opposes violence,
[13] etc., etc., and to simply highlight that statement
[14] in that document, to which I also object to the
[15] highlighting in the document, and to repeat that
[16] without repeating all the rest of what he said, I
[17] think is distorting the record, and I think it's
[18] intentional.

[19] **MR. LANDES:** Well, the question is if
[20] you come out and you say you support Hamas, you
[21] have to understand that there's certain attendant
[22] aspects to that, and my question is whether this

1—11:29:43 22—11:30:26

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[1] witness who was a spokesman for the IAP at the time
[2] was conversant with what Hamas stood for so that
[3] when he the made the statement, it was an informed
[4] statement and it was one that's based on knowledge
[5] of the fact that Hamas was taking the position that
[6] all lands that Muslims ever occupied should revert
[7] to being Muslim lands, and I think that in terms of
[8] understanding the position the IAP was taking
[9] publically, which he says it was not in favor of
[10] Hamas, what that means. I think that's a fair
[11] statement.

[12] **MR. BOYD:** My objection is that that's
[13] not what the witness said in that statement. What
[14] he said is in the statement.

[15] **MR. McMAHON:** And I have a continuing
[16] objection. Do we have a pending question?

[17] **MR. LANDES:** Yeah. I think we do, but
[18] I'll restate the question.

[19] **MR. McMAHON:** Please.

[20] **BY MR LANDES:**

[21] **Q:** My question to you, sir, is having seen
[22] this covenant, and he's answered to it, you said

1—11:30:29 22—11:31:36

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[1] you hadn't seen it before; it's the first time
[2] today sitting in this deposition, your testimony is
[3] you've never looked at the Hamas Covenant.
[4] Correct?

[5] **A:** Correct.

[6] **Q:** Okay. Having seen that and gone back
[7] and reflecting on the statement you made before, do
[8] you still think that that was an appropriate
[9] statement on behalf of IAP?

[10] **A:** I would invite you to re-read my
[11] statement again that was made nine years ago about
[12] my impressions of the reputation of the
[13] organization then by the Palestinians, providing
[14] them services, not attack civilians, not being
[15] designated by the United States as an illegal
[16] terrorist entity. It was an innocuous statement,
[17] and I clearly said that I believe in democracy, I
[18] believe in peace, and we should not focus on the
[19] radical or extremist elements or aspects regardless
[20] of who they are.

[21] **Q:** Okay. Fine. Just to ask one question,
[22] you say attacking civilians. How do you define

1—11:31:39 22—11:32:23

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[1] civilians in the context of this dispute?

[2] **MR. McMAHON:** Are we talking about he
[3] '93-'94?

[4] **MR. LANDES:** When he made the statement
[5] in '94.

[6] **BY MR. LANDES:**

[7] **Q:** How did you understand civilians in '94?

[8] **A:** Civilians who are non-combatants.

[9] **Q:** All right.

[10] **A:** Not fighting and—

[11] **Q:** Obviously a member of the Israel Defense
[12] Forces would not be a civilian?

[13] **A:** No.

[14] **Q:** An active—I'll back that up. An active
[15] member, not a reserve member, an active member of
[16] the Israel Defense Forces we would agree is not
[17] civilian?

[18] **A:** I'm not a military expert—

[19] **Q:** As a person—

[20] **A:** —to go through the categories of these
[21] terms, because I know I'm speaking to the Court,
[22] and so please understand my limited knowledge of

1—11:32:29 22—11:33:22

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[1] what you're talking about.

[2] **Q:** But you used the word "civilians", and I
[3] just ask what you meant by it.

[4] **A:** Because we live in the civil society.

[5] **Q:** Right.

[6] **A:** And we know what civilians mean.

[7] **Q:** Well, I ask you what you mean by it.

[8] **A:** Just like me and you.

[9] **Q:** Okay. So we'd be civilians?

[10] **A:** Yes.

[11] **Q:** Would a person living in the settlement
[12] be a civilian in the occupied territories?

[13] **A:** Yes.

[14] **Q:** Okay. Now just back to what you say the
[15] focus of the talk was. You were, I guess—I don't
[16] want to mischaracterize your statement. You were
[17] talking about what one would call the social
[18] elements of Hamas in the occupied territories; is
[19] that correct?

[20] **A:** Yes.

[21] **Q:** How would you define that?

[22] **A:** Providing help to the needy.

1—11:33:24 22—11:34:38

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1) Q: Now, what—how did they go about
2) providing the help to the needy?

3) A: I have not been there, and I do not have
4) any knowledge.

5) Q: But you said—all right. Mr. Awad, we
6) can shorten this deposition. You said providing
7) help to the needy. How do they provide help? Did
8) they just hand out dollar bills? Did they have
9) institutions? Did they have facilities? What did
10) they do?

1) A: You will not scrutinize every statement
2) that was given by any American when they talk about
3) social services, and I have no knowledge of the
4) details of what I meant by the statement except my
5) impression as a Palestinian in 1994, speaking in a
6) university setting, focusing on my impression of
7) what I learned, what I knew then of the movement
8) that was gaining popularity among the majority of
9) Palestinians probably.

10) Q: But you took the position that one
11) Palestinian organization, Hamas, was becoming more
12) popular than the PLO; is that correct?

1—11:34:40 22—11:35:59

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1) A: Yes.

2) Q: Okay. And why did you feel they were
3) becoming more popular?

4) A: I was the president of a secular
5) organization on campus, and I deal with people from
6) all political spectrum, and I respect them and they
7) respect me, and that was the discussion. So
8) through discussions and work on campus, I came to
9) that impression.

10) Q: So you just took a poll of people you
11) ran into, an informal or just an episodic or
12) anecdotal evidence that people seemed to be more in
1) favor of the Islamic organization?

2) A: Yes. Being a president of a secular
3) organization, people within the student movement,
4) and they started to prefer the reputation and less
5) corrupt organization, Islamic Hamas, then that did
6) not attack civilians and was not designated by the
7) government as a terrorist organization. There was
8) the support to it then, the organization we worked
9) within.

10) Q: I'm sorry. Are you finished?

1—11:36:01 22—11:36:47

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1) A: Yes.

2) Q: So you say: "Go ahead and visit the
3) area. You will feel and find that the Islamic
4) Hamas along with the other Islamic movements in the
5) area are the most popular movements in the area,
6) the most people who respond to the daily needs of
7) the people." So it seems from your comment that
8) you were talking not simply about what you were
9) hearing from fellow Muslim students in the United
10) States, but you were talking about what you
11) understood or had observed the situation to be in
12) the occupied territories. Is that correct?

13) MR. BOYD: Object to form.

14) THE WITNESS: That was my impression of
15) that.

16) BY MR. LANDES:

17) Q: And when you said that—

18) A: I—

19) Q: I'm sorry.

20) A: I did not have documents to provide. I
21) just maybe reflected the views of my people I know
22) then.

1—11:36:48 22—11:37:56

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1) Q: Where were these people? Were they
2) here? Were they in the United States or were they
3) in Palestine?

4) A: Mainly on campus.

5) Q: Okay. When you talked about the most
6) people who respond to the daily needs of the
7) people, what were you talking about?

8) A: It just means what it means then.

9) Q: Well, what did it mean?

10) A: I'm not a relief expert to—I have not
11) been there, and you don't want to hold me
12) accountable to a statement that was innocuous,
13) again, and I don't know why you want to take me to
14) a task knowing that my involvement with that
15) organization was limited, in limited capacity, and
16) I just gave my personal reflections.

17) Q: Okay.

18) A: And we live in a free society, and
19) people under the freedom of expression can talk
20) about their feelings, and that was my feeling.

21) Q: All right. And, you know, it's either
22) one of two things. Either you're telling me that

1—11:37:59 22—11:38:50

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[1] you really based these comments on very limited
[2] knowledge—is that what you're saying?
[3] **MR. McMAHON:** I object to—
[4] **MR. LANDES:** Or you have—
[5] **MR. McMAHON:** You've asked him so many
[6] questions pertaining to so many statements in here.
[7] You know, I want to cut this off at some point, but
[8] I want to give the right to examine him regarding
[9] all this stuff, but how many questions are you
[10] going to pose with respect to these statements?
[11] **MR. LANDES:** Until, you know, I
[12] understand exactly how it was that the witness made
[13] this statement and what he was referring to, what
[14] information he had, whether he had any knowledge of
[15] any institutions in the occupied territories or
[16] services provided by Hamas. Is he just speaking in
[17] the most broad generalities, or is he speaking to
[18] something specific that Hamas was doing for the
[19] people in the occupied territories?
[20] **THE WITNESS:** It was my general
[21] impression. Like when you asked people then, many
[22] people will give you the same idea. I was not an

1—11:38:53 22—11:39:49

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[1] expert then. I'm not an expert now.
[2] **BY MR. LANDES:**
[3] **Q:** I'm not asking you to testify as an
[4] expert. Okay? Were you aware at the time you made
[5] this statement—let's try it a different way—that
[6] Hamas sponsored various social welfare agencies in
[7] the occupied territories?
[8] **MR. BOYD:** Object to form.
[9] **THE WITNESS:** I think in my statement, I
[10] refer to Islamic movement in general.
[11] **BY MR. LANDES:**
[12] **Q:** You said Hamas along with other Islamic
[13] movements in the area. Right?
[14] **A:** That was my general impression of—those
[15] were Muslims and actively working in the
[16] territories.
[17] **Q:** Working in which way?
[18] **A:** The way I described.
[19] **Q:** Which was?
[20] **A:** I'll just go back to my statement again.
[21] **Q:** My question is were you speaking to any
[22] specific types of services that Hamas was providing

1—11:39:54 22—11:40:54

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[1] in the occupied territories?
[2] **A:** Not specifically.
[3] **Q:** Generally?
[4] **A:** If you asked me this nine years ago, I
[5] don't know what further elaboration I would have
[6] made.
[7] **Q:** Okay.
[8] **A:** So—and nine years ago, I don't have
[9] exact recollection of my memory. So I just
[10] examined what you showed me, and I commented on it.
[11] **Q:** As you sit here today, you're telling—
[12] **A:** So I cannot revive my memory and my
[13] feelings and knowledge nine years ago.
[14] **Q:** All right. Then let me ask you this.
[15] Just maybe this will help. Did you subsequently
[16] learn, after you gave this talk, that Hamas, in
[17] fact, had a network of social welfare organizations
[18] in the occupied territories?
[19] **A:** Not beyond what I've read in the
[20] newspapers.
[21] **Q:** So you have no personal knowledge?
[22] **A:** No.

1—11:40:56 22—11:42:23

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[1] **Q:** No one's ever told you that they were in
[2] the occupied territories and they had any occasion
[3] to visit a social welfare agency that was sponsored
[4] by Hamas?
[5] **A:** No.
[6] **Q:** So you never looked into that? You
[7] never thought it was important to know in terms of
[8] your position that you've had since then in terms
[9] of what's going on on the ground in the occupied
[10] territories, of who provides for the needs of the
[11] people?
[12] **A:** No.
[13] **Q:** Now, you were subsequently, in November
[14] of 1994, interviewed by Mike Wallace, correct, on
[15] "60 Minutes"?
[16] **A:** Yes.
[17] **Q:** And I know, Mr. Awad, that I'm asking
[18] you these questions and your lawyer is going to
[19] think that there's, you know, some conspiracy here,
[20] but the fact of the matter here is if I put your
[21] name in Google, right, I get this stuff. It
[22] doesn't come from any, you know, get this Mike

1--11:42:28 22--11:43:13

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(1) Wallace transcript, it's just out there. Right?
(2) you agree with that? I'll give it to you.
(3) A: Yes.

(4) MR. McMAHON: Does he agree to what?
(5) That he was interviewed by Mike Wallace or that
(6) when you Google, you come up with—

(7) MR. LANDES: That he's the man—
(8) BY MR. LANDES:

(9) Q: It's true, isn't it—let me just ask you
(10) this question: You have a public role that you
(11) fulfill every day; isn't that correct?

(12) A: Yes.

(13) Q: On behalf of the Islamic community in
(14) the United States. It's a very public role?

(15) A: Correct.

(16) Q: And it's in your CV, and it's something
(17) I'm sure that you're proud of.

(18) A: Yes.

(19) Q: Okay. So, therefore, information that
(20) any person could obtain about you is obviously in
(21) the public domain?

(22) A: Yes.

1--11:43:13 22--11:44:32

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(1) [Awad Exhibit No. 6 was
(2) marked for identification.]

(3) MR. LANDES: This is 6, and this has
(4) actually been stamped BO 2184 through 2190 on the
(5) bottom, Bates stamped.

(6) MR. McMAHON: Do you want him to read
(7) this whole thing or a specific section?

(8) MR. LANDES: No. I'm going to ask
(9) him—he's not in the whole thing, and references to
(10) Mr. Awad are on page 2188 to 2189. Do you to see
(11) that?

(12) BY MR. LANDES:

(13) Q: Now, Mr. Awad, you can take the time to
(14) actually look at the whole document, but the first
(15) question I'm going to ask you is whether this, in
(16) fact, appears to be the transcript of a television
(17) program, "60 Minutes", on November 13, 1994 in
(18) which you were one of the participants.

(19) A: Participants in what?

(20) Q: In this television program.

(21) A: Do you want me to read the whole thing?

(22) Q: Well, you don't have to read it. You

1--11:44:40 22--11:46:44

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(1) can just look at it enough just to see whether you
(2) can tell me that this appears to be the transcript
(3) of the television program in which you were a
(4) participant.

(5) [Witness peruses exhibit.]

(6) [Discussion held off the record.]

(7) THE WITNESS: Yes?

(8) BY MR. LANDES:

(9) Q: Does this appear to be the transcript of
(10) the interview that you participated in?

(11) A: Yes, it does.

(12) Q: Let's take a look at page 2188.

(13) A: Yes.

(14) Q: And you see that there is a reference at
(15) the—the second reference to Wallace, it's about a
(16) third of the way down the page. Right? Do you see
(17) that?

(18) A: Yes.

(19) Q: Okay. And he quotes Steve Emerson and
(20) he makes some reference, Mr. Wallace does, to the
(21) Islamic Association for Palenstine producing a
(22) video that apparently was shown on the television

1--11:46:45 22--11:47:59

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(1) showing Hamas soldiers training in Gaza and makes
(2) the statement the Islamic Association for
(3) Palenstine sells audiotapes, pamphlets, and
(4) booklets showing Hamas soldiers, apparently, trying
(5) to influence the American people. Do you see that?
(6) Just read the Wallace statement. Okay? It

(7) says—one that says Wallace voice-over Emerson
(8) says. Do you see that?

(9) A: Yes.

(10) Q: Okay. Now, at the time you were at IAP,
(11) did IAP produce videos showing Hamas soldiers
(12) training in Gaza for their holy war against Israel?

(13) A: I don't recall that.

(14) Q: You never saw videos of that sort?

(15) A: No.

(16) Q: Not when you were working there?

(17) A: No.

(18) Q: Ever?

(19) A: Ever.

(20) Q: Okay. Now, have you ever heard of an
(21) organization called Oqsavision?

(22) A: An organization?

1—11:48:00 22—11:49:06

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[1] Q: Well, have you ever heard of Oqsavision,
[2] A-Q-S-A-V-I-S-I-O-N?
[3] A: I think, if I remember, it been within
[4] the office there.
[5] Q: And that organization produced
[6] videotapes. Correct?
[7] A: I used to see TV sets, one or two TV
[8] sets, and VCRs.
[9] Q: All right. Did you ever see any of the
[10] videotapes that Oqsavision produced?
[11] A: Maybe one. I don't remember.
[12] Q: You don't remember. You were involved
[13] in outreach and public relations and as a spokesman
[14] for the organization, IAP, and it's strikes me as
[15] strange that you would not have had contact with
[16] any videos that they produced. Is that—am I wrong
[17] or right?
[18] MR. McMAHON: It may strike you as
[19] strange, and I don't like the colloquy. If you
[20] have a question, pose the question for him.
[21] MR. LANDES: I'm asking him whether he's
[22] seen any of those videos.

1—11:49:08 22—11:49:51

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[1] MR. McMAHON: I think that was asked and
[2] answered.
[3] MR. LANDES: All right.
[4] MR. McMAHON: He said no.
[5] BY MR. LANDES:
[6] Q: So no is the answer; is that it?
[7] A: As I indicated earlier, most of my work
[8] was outreach and outside the office.
[9] Q: Now look at the bottom of the page.
[10] A: Yes.
[11] Q: Wallace, apparently showing a literature
[12] display, says above, paren, footage of literature
[13] display. Do you see that?
[14] A: Yes.
[15] Q: Then it says: Wallace, paren,
[16] voice-over, closed paren, We asked him, and that's
[17] you, about the IAP pamphlets denigrating Jews, and
[18] then you have a response. All right? Do you want
[19] to read that response? Have you read it?
[20] A: I read it.
[21] Q: You said: "I asked them to remove that
[22] from the shelf, and I asked them to clean all these

1—11:49:54 22—11:51:18

Page 99

[1] things because it only—does only damage to the
[2] organization, to cause of the Palestinians, and to
[3] Muslims in general. Did you make—you made that
[4] statement?
[5] A: Yes, I did.
[6] Q: Okay. Now, do you recall sitting here
[7] today who the "them" is that you asked to remove
[8] these pamphlets from the shelf?
[9] A: If I remember, there was one of the
[10] booklets, that I don't recall exactly, that
[11] has—was brought to my attention as being
[12] antisemitic, and I took it upon myself to make sure
[13] that the organization should remove all of these
[14] antisemitic and hateful material from the office,
[15] and I think they responded, because I made the
[16] argument then, nine years ago, that does not—that
[17] that is not representative or should not be
[18] representative of the Palestinians and their
[19] approach and attitudes towards Jews.
[20] Q: Do you recall specifically who you asked
[21] to remove these pamphlets?
[22] A: I made the recommendation to the office

1—11:51:21 22—11:52:13

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[1] manager then.
[2] Q: Who was that? Was that Mr. Dahduli?
[3] A: Yes.
[4] Q: Did you mention it to anybody else who
[5] was in a higher position than Mr. Dahduli?
[6] A: No.
[7] Q: Do you know whether, in fact, he removed
[8] the pamphlets?
[9] A: I think he did.
[10] Q: Do you know whether IAP ceased selling
[11] or publishing or distributing those pamphlets?
[12] A: To my knowledge, during my presence
[13] there, they did because it was offensive to me and
[14] I made it very clear.
[15] Q: So you took care of that?
[16] A: Yes.
[17] Q: Okay. You can put the document away.
[18] MR. LANDES: Let's go off the record a
[19] second. Do you want to take a break now? It's
[20] been about two hours.
[21] VIDEOGRAPHER: We're now going off the
[22] video record at 11:51 a.m.

1—12:06:51 22—12:07:47

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[1] [Recess.]

[2] GEOGRAPHER: We're now back on the
[3] video record. The time is 12:06 p.m.

[4] MR. LANDES: All right. Back on the
[5] record now.

[6] Mr. Awad, I'm going to ask you some
[7] questions about the time you worked at IAP and
[8] whether you worked with certain individuals there.
[9] I thought maybe we'd just go through this list, and
[10] you can tell me pretty quickly what your
[11] relationship was with them then and is with them
[12] presently. Okay?

[13] I'm going to hand you an exhibit. I'd
[14] ask that it be marked.

[15] [Awad Exhibit No. 7 was
[16] marked for identification.]

[17] BY MR. LANDES:

[18] Q: This is—this is not—this is just a
[19] document we have. It's our document put together
[20] of the Islamic Association for Palenstine. Just to
[21] go back, I asked you, I believe, when you worked
[22] there, who did you report to?

1—12:07:49 22—12:08:22

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[1] A: The office manager.

[2] Q: Mr. Dahduli?

[3] A: Yes.

[4] Q: What was your understanding; who did he
[5] report to?

[6] A: To the board.

[7] Q: All right. Was there—was Mr. Ahmad the
[8] president at the time?

[9] A: Probably.

[10] Q: Was he essentially the person ultimately
[11] in charge?

[12] A: I wasn't sure.

[13] Q: You don't know?

[14] A: No.

[15] Q: All right. You just reported to Mr.
[16] Dahduli?

[17] A: Yes.

[18] Q: Okay. But you couldn't find him now.
[19] Right? He's not in the country anymore as far as
[20] you know?

[21] A: I don't know.

[22] Q: When was the last time you spoke to him?

1—12:08:25 22—12:09:16

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[1] A: I don't recall.

[2] Q: In the past year or two?

[3] A: Way before that.

[4] Q: I'm sorry?

[5] A: Way before.

[6] Q: Way before. Now, we have you—turn to
[7] the left part of the chart. It says IAP Board of
[8] Directors, slash, Shura Council. Would you tell us
[9] what a Shura Council is?

[10] A: Consultative council.

[11] Q: And at the time you worked at IAP, was
[12] there a Shura Council?

[13] A: I wasn't sure.

[14] Q: Did you ever meet with A Shura Council
[15] of IAP?

[16] A: I don't remember.

[17] Q: You don't just know?

[18] A: No.

[19] Q: Do you know whether at the time you were
[20] at IAP the Shura Council had regular meetings?

[21] A: I did not know.

[22] Q: Did you at the time you were at IAP ever

1—12:09:20 22—12:10:14

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[1] have—come into contact with Rafeeq Jaber?

[2] A: Around that time, yes, I did.

[3] Q: And what was Mr. Jaber's position at IAP
[4] at the time you worked there?

[5] A: I don't remember.

[6] Q: And Mr. Rafeeq Jaber is located in
[7] Chicago; is that correct?

[8] A: To my knowledge.

[9] Q: All right. And you have no knowledge as
[10] to what his responsibilities at IAP were?

[11] A: No.

[12] Q: Can you recall why you had occasion to
[13] talk to him or deal with him when you were there?

[14] A: I know him more through the Arab
[15] American Institute meetings.

[16] Q: What is that? Arab American Institute?

[17] A: Yes.

[18] Q: What organization is that, sir?

[19] A: It's a secular organization in
[20] Washington.

[21] Q: And when did that organization come into
[22] existence?

1—12:10:14 22—12:11:23

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- [1] A: I did not know.
- [2] Q: When did you first come into contact
- [3] with that organization?
- [4] A: To the best of my recollection,
- [5] during—around the time of my involvement with the
- [6] General Union of Palestine Students.
- [7] Q: So that predates your involvement with
- [8] IAP?
- [9] A: I'm not sure what year, but I know
- [10] him—I knew him more through the Arab American
- [11] Institute functions that I attended at times.
- [12] Q: Do you have any knowledge as to what
- [13] role Mr. Jaber played for IAP?
- [14] A: Not specifically.
- [15] Q: Well, what do you know?
- [16] A: I know he was known within the IAP.
- [17] Q: Do you know whether he had
- [18] responsibilities at IAP?
- [19] A: Not to my best recollection.
- [20] Q: All right. So if someone were to ask
- [21] you to comment on anything he said or did for IAP,
- [22] that would be beyond your knowledge?

1—12:11:25 22—12:12:10

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- [1] A: I don't remember being involved actively
- [2] and closely with him.
- [3] Q: Did you go out and speak at any of the
- [4] Chicago events at the time you were spokesman for
- [5] IAP?
- [6] A: I can't remember.
- [7] Q: The next person on the list, Abdelbaset
- [8] Hamayel. Did you know that person?
- [9] A: No.
- [10] Q: Never met him?
- [11] A: I don't think so.
- [12] Q: Have you ever heard of him?
- [13] A: This is the first time.
- [14] Q: The first time?
- [15] A: Yes.
- [16] Q: Okay. So you would have no knowledge as
- [17] to any involvement he had with IAP; is that
- [18] correct?
- [19] A: No.
- [20] Q: It's correct. Right? You had no
- [21] knowledge?
- [22] A: I have no knowledge. I have no

1—12:12:12 22—12:12:56

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- [1] knowledge of him being involved, because I did not
- [2] know him.
- [3] Q: Have you had any contact with him
- [4] subsequent to your involvement with IAP?
- [5] A: Never.
- [6] Q: What about Mohammad El-Natour?
- [7] A: Same.
- [8] Q: He was, at least in our—according to
- [9] our records, he was chief financial officer at IAP
- [10] in Illinois. It's your testimony you don't know
- [11] this man?
- [12] A: I don't know. What year are you asking
- [13] me about?
- [14] Q: Well, let's say at the time you worked
- [15] at IAP.
- [16] A: I don't recollect meeting or knowing
- [17] him.
- [18] Q: What about afterwards?
- [19] A: Neither.
- [20] Q: Okay. What about Salah Daoud?
- [21] A: The same.
- [22] Q: Never heard of him?

1—12:12:57 22—12:13:41

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- [1] A: No.
- [2] Q: Emad Sarsour?
- [3] A: I met him once or twice.
- [4] Q: When?
- [5] A: In Milwaukee.
- [6] Q: All right. That was where, but when?
- [7] Do you remember?
- [8] A: During a media seminar that I had given,
- [9] I think.
- [10] Q: Was that at the time you were at IAP?
- [11] A: No.
- [12] Q: It was subsequent to then?
- [13] A: Yes.
- [14] Q: So you would have no knowledge as to
- [15] what Mr. Sarsour's responsibilities were at IAP?
- [16] A: That's true.
- [17] Q: Do you know where Mr. Sarsour is at the
- [18] present time?
- [19] A: My guess is in Wisconsin.
- [20] Q: Do you know if he holds positions in any
- [21] other Arab or Islamic organizations?
- [22] A: Probably the local Islamic Center. I'm

1—12:13:44 22—12:14:18

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[1] not sure.
[2] Q: Beyond that, you have no knowledge?
[3] A: I'm not sure if he's with IAP or not.
[4] Q: What about Muhammad—oh, I'm sorry. I
[5] skipped one—Sufian An-Nabhan?
[6] A: Never met him.
[7] Q: Nabhn, I guess, N-A-B-H-A-N?
[8] A: Never met him.
[9] Q: Don't know him?
[10] A: No.
[11] Q: So you would know nothing he did for
[12] IAP?
[13] A: That's true.
[14] Q: There's a name Muhammad Abdel'al.
[15] A: Same thing.
[16] Q: You don't know him?
[17] A: No.
[18] Q: Never had contact with him at IAP?
[19] A: No.
[20] Q: Have you had contact with him
[21] subsequently?
[22] A: No.

1—12:14:21 22—12:15:00

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[1] Q: Mahmoud Shafeeq, is that a person you
[2] know?
[3] A: No.
[4] Q: You had no contact with him at IAP?
[5] A: No.
[6] Q: And not any subsequent to that?
[7] A: No.
[8] Q: IAP D.C., Fawaz Mushtah, M-U-S-H-T-A-H?
[9] A: Yes.
[10] Q: Do you know him?
[11] A: Yes.
[12] Q: Now, did you know him when you were
[13] working at IAP?
[14] A: No.
[15] Q: So it's all subsequent?
[16] A: Yes.
[17] Q: All right. And what—could that be—do
[18] you think that's the correct spelling? Is there a
[19] "Q" at the end or an "H"? We weren't sure.
[20] A: Arabic names have different spelling.
[21] Q: Okay.
[22] A: But it sounds familiar.

1—12:15:01 22—12:15:45

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[1] Q: Okay. How do you know this person?
[2] A: He's a travel agent in Washington.
[3] Q: And do you do business with him?
[4] A: Yes, we do.
[5] Q: CAIR?
[6] A: Yes.
[7] Q: Beyond his business, okay, do you have
[8] any—do you do any work with him in any of
[9] political or social activities?
[10] A: No.
[11] Q: So he's not active in CAIR or any other
[12] organization that you're aware of?
[13] A: Not to my knowledge.
[14] Q: Now let's go to the right side here.
[15] The first person on the list is Musa Abu Marzook.
[16] Right?
[17] A: Yes.
[18] Q: And he was, according to our records, at
[19] one time the chairman of the advisory board of IAP.
[20] Do you know that to be the case?
[21] A: No.
[22] Q: You've never heard that Mr. Marzook,

1—12:15:49 22—12:16:37

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[1] Dr. Marzook was the chairman of IAP?
[2] A: No.
[3] Q: Did you have any contact with Mr. Musa
[4] Abu Marzook while you were working at IAP?
[5] A: No.
[6] Q: When you were at IAP, did you learn
[7] anything about Mr. Marzook's activity at any time
[8] on behalf of IAP?
[9] A: Never.
[10] Q: No one ever told you anything with
[11] respect to Marzook having had a role in the
[12] formation of IAP, for example?
[13] A: Never.
[14] Q: Have you ever met Mr. Marzook?
[15] A: No.
[16] Q: All right. Now, the next person on the
[17] list—and if I asked you where Mr. Marzook is, I
[18] assume you couldn't tell me?
[19] A: Excuse me?
[20] Q: You wouldn't know where he is right now?
[21] A: I don't know.
[22] Q: Okay. He'd been a defendant in this

1—12:16:38 22—12:17:18

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[1] case, but we couldn't serve him. We couldn't find
[2] him.

[3] Sami Al Arian, is that a person that you
[4] know?

[5] A: Yes.

[6] Q: That is Mr. Arian who was for many years
[7] in south Florida; is that correct?

[8] A: Yes.

[9] Q: Okay. Now, at the time you worked at
[10] IAP, was Sami Al Arian involved in IAP?

[11] A: I don't remember. I don't think so.

[12] Q: You're not sure?

[13] A: Yeah.

[14] Q: Okay. You had no contact with him with
[15] respect to IAP activities?

[16] A: No.

[17] Q: Did anybody ever tell you that Sami Al
[18] Arian was a founder of IAP?

[19] A: I heard it from somewhere.

[20] Q: Do you remember from whom?

[21] A: No.

[22] Q: At the time you were there, did anybody

1—12:17:20 22—12:18:07

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[1] ever tell you that Mr. Arian continued to have a
[2] relationship with IAP?

[3] A: I don't remember.

[4] Q: Okay. At any time that you were at IAP,
[5] was Mr. Arian invited to participate in any IAP
[6] activities?

[7] A: I have no recollection.

[8] Q: Did you attend any IAP functions—let me
[9] restate that question. It's true, isn't it, that
[10] IAP, for example, had a regular annual convention;
[11] isn't that correct?

[12] A: Yes.

[13] Q: Different cities, some years in Chicago,
[14] some years in Kansas City, sort of from place to
[15] place?

[16] A: Right.

[17] Q: And those conventions typically invited
[18] a variety of speakers to come to address the
[19] members of IAP; is that correct?

[20] A: Yes.

[21] Q: In fact, they invited speakers both
[22] domestically and from abroad to come and speak?

1—12:18:11 22—12:19:03

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[1] A: Yes.

[2] Q: Okay. Did Sami Al Arian ever speak at
[3] any of the IAP events that you attended?

[4] A: I have no knowledge of that.

[5] Q: Well, I'm asking—

[6] A: My involvement with IAP was limited to
[7] one year.

[8] Q: Okay. Aside from your involvement when
[9] you had a responsibility, did you ever go to IAP
[10] events before or after you actually worked there?

[11] A: Probably the year I worked during IAP.

[12] Q: So you went—if there was a convention
[13] in, say—it's my impression that those conventions
[14] were usually in December each year. Is that true?

[15] A: Probably.

[16] Q: Yeah. So you probably attended a
[17] meeting, the national meeting, in December of 1993;
[18] is that fair statement?

[19] A: Probably, but I'm not sure.

[20] Q: Okay. So you don't remember Al Arian
[21] speaking at that meeting?

[22] A: I don't remember.

1—12:19:04 22—12:20:13

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[1] Q: Did you attend any IAP conventions or
[2] meetings after the time that you left the
[3] organization in a formal capacity?

[4] A: My involvement was in the functions I
[5] was invited to during my one-year employment there.
[6] Which ones exactly, I don't remember.

[7] Q: Okay.

[8] A: That was, again, nine years ago.

[9] Q: All right. But my impressions is that
[10] IAP conventions get a large attendance.

[11] A: That's your statement.

[12] Q: Okay. Are you still a member of IAP?

[13] A: No.

[14] Q: When did you—let me ask you this: IAP
[15] is a membership organization. People can actually
[16] join it; isn't that correct?

[17] A: I don't know if they had a membership or
[18] they had membership.

[19] Q: At the time you were there, did they
[20] have—was it a membership organization?

[21] A: I don't recall. Again, that was nine
[22] years ago.

1—12:20:13 22—12:21:07

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1] Q: Well, for example, CAIR, is that a
2] membership organization?
3] A: It has members.
4] Q: In other words, if a person wants to
5] join, they can send in dues and become a member?
6] A: Right.
7] Q: Okay. But you don't recall whether IAP
8] or any of the different parts of IAP were
9] membership organizations?
10] A: I have to ask them on that particular
11] year of my involvement with them if they had
12] membership or not, but again, you're asking me nine
13] years later.
14] Q: All right. Okay. So as far as you
15] know, you never attended any IAP event where Sami
16] Al Arian participated?
17] A: I don't remember.
18] Q: When you were at IAP, did they keep
19] records of the different conventions, who came
20] there, who spoke at them? Were there files—you
21] were the spokesman—that you could look at of the
22] history of their conventions or meetings?

1—12:21:10 22—12:22:04

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1] A: I think—I don't think they were very
2] organized.
3] Q: But that wasn't the question. The
4] question is do you recall whether they had any
5] files or collections that would tell a person who
6] spoke at the various IAP conventions or regional
7] meetings at any time?
8] A: The only thing I remember, maybe in some
9] drawers you would see like a bunch of pictures and
10] publications, but they were very not very
11] organized.
12] Q: In other words, if they had, say, a
13] convention in 1989, I mean, you would assume that
14] you could go to a file, look at it. I assume if
15] there's a convention, you send out a notice.
16] People send back—
17] A: I had no—
18] Q: —that they're coming.
19] A: I'm not sure.
20] Q: Okay. That people are coming and so on
21] and forth and that they keep a record, but you know
22] of no records of that sort?

1—12:22:07 22—12:22:45

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1] A: I don't know if they had any records of
2] that.
3] Q: Because we haven't gotten any, and I
4] just wondered if you ever saw them?
5] A: As I said, my impression is that it was
6] not very organized.
7] Q: Okay. Do you know Mr. Shukri Abu Baker?
8] A: Yes.
9] Q: And did you know him when you worked at
10] IAP?
11] A: Yes.
12] Q: In what capacity did you know him?
13] A: He was a known person in the community.
14] Q: Was he active in IAP?
15] A: I'm not sure if he was active with IAP.
16] Q: Did anybody tell you that he was on the
17] advisory board of IAP?
18] A: No.
19] Q: Did you ever consult with him while you
20] were at IAP concerning your activities?
21] A: No.
22] Q: Have you maintained contact with Mr. Abu

1—12:22:48 22—12:23:37

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1] Baker since you left IAP?
2] A: I think he visited us some time ago in
3] Washington.
4] Q: In what? The past year?
5] A: Maybe two or three years ago or more. I
6] don't remember exactly.
7] Q: Was Mr. Abu Baker the person that IAP
8] dealt with when they had to deal with HLF at the
9] time you were there?
10] A: I'm not sure exactly.
11] MR. BOYD: Objection to form.
12] BY MR. LANDES:
13] Q: Did you deal directly with him on IAP
14] matters?
15] A: No.
16] Q: Okay. Do you know Basman Elashi?
17] A: I heard of his name.
18] Q: Was he an officer, director, or—of IAP
19] when you were there?
20] A: I don't remember that.
21] Q: You don't know?
22] A: No.

1—12:23:39 22—12:24:20

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- [1] Q: Have you had contact with Basman Elashi
[2] since you left IAP?
[3] A: No.
[4] Q: You just—you had no contact with him
[5] since 1994?
[6] A: To the best of my memory, yes.
[7] Q: What about Amer Shawa; do you know that
[8] person?
[9] A: I heard his name.
[10] Q: Do you know him personally?
[11] A: No.
[12] Q: Never met him?
[13] A: Probably once.
[14] Q: When you say probably once, I mean, once
[15] is once.
[16] A: Maybe in one of the conferences.
[17] Q: All right. Was he an active participant
[18] in IAP when you were there?
[19] A: He was known to IAP.
[20] Q: What does that mean?
[21] A: Like one of the active people in the
[22] Palestine community.

1—12:24:23 22—12:25:55

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- [1] Q: Where was he located in 1993-94, do you
[2] know?
[3] A: I don't remember.
[4] Q: Have you had contact with him since you
[5] left IAP?
[6] A: No.
[7] MR. LANDES: We'll just take a break now
[8] to change the tape.
[9] VIDEOGRAPHER: We're now going off the
[10] video record at 12:23 p.m., and this is the end of
[11] Tape 1.
[12] [Recess.]
[13] VIDEOGRAPHER: We're now back on the
[14] video record. The time is 12:24 p.m., and this is
[15] the start of Tape 2.
[16] BY MR. LANDES:
[17] Q: Okay. The last question was asked about
[18] Amer Shawa; is that correct?
[19] A: Yes.
[20] Q: Now, is that the same Amer Al Shawa who
[21] was on the board or directors of CAIR?
[22] A: I don't know. Amer Al Shawa?

1—12:25:56 22—12:27:08

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- [1] Q: Yes. It says Amer Shawa. Okay?
[2] A-M-E-R, S-H-A-W-A. Right?
[3] A: As I told you, I don't remember if he
[4] was in this capacity or not.
[5] Q: Okay. But I asked you if you had had
[6] contact with him subsequently.
[7] A: No, not to my knowledge.
[8] Q: So he would not—is there an individual
[9] named Amer Al Shawa who was on the board of
[10] directors at one time, either now or at one time,
[11] of CAIR?
[12] A: Repeat the question, please.
[13] Q: Is there an individual Amer Al Shawa who
[14] was or is a board member of CAIR?
[15] A: Not to my knowledge.
[16] Q: What about Muhammad Al Hanooti; do you
[17] know that person?
[18] A: Yes, I do.
[19] Q: Was he active at IAP when you were
[20] there?
[21] A: I can't remember.
[22] Q: Was he once, as far as you know, the

1—12:27:10 22—12:27:52

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- [1] president of IAP?
[2] A: I don't know.
[3] Q: All right. Have you had contact with
[4] Muhammad Al Hanooti since you left IAP?
[5] A: Yes.
[6] Q: In what capacity?
[7] A: He's a known scholar in Virginia.
[8] Q: In Virginia?
[9] A: Yes.
[10] Q: He is—is he the same Mr. Al Hanooti who
[11] is the head of a large mosque in Virginia?
[12] A: I don't think he's the head a mosque.
[13] Q: An active participant in the—
[14] A: He's imam.
[15] Q: He's imam?
[16] A: Or he was imam.
[17] Q: Excuse me for the misprecision, but
[18] would he be the spiritual leader of the mosque?
[19] A: I don't know if that term is accurate,
[20] spiritual leader.
[21] Q: Okay. Then we'll just keep it the way
[22] it is. He's the imam of the mosque; is that

1—12:27:54 22—12:28:55

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[1] correct?
[2] : Used to be.
[3] Q: During what period of time?
[4] A: I don't remember exactly.
[5] Q: Until recently?
[6] A: Like a few years ago.
[7] Q: Do you recall specifically—I'll ask you
[8] again whether he had any active role in IAP when
[9] you were there.
[10] A: I don't remember that.
[11] Q: Was he one of the people that you spoke
[12] to at IAP when were upset about the nature of some
[13] of the materials that IAP was producing?
[14] A: As I said in my earlier statement—
[15] MR. BOYD: First of all, I'll object.
[16] THE WITNESS: —to the best of my
[17] recollection, my dealing was with the office
[18] manager, and that's where I took my things to.
[19] BY MR. LANDES:
[20] Q: Now, Omar Ahmad, that's the same
[21] gentleman who was the president of IAP at the time
[22] you were there?

1—12:28:57 22—12:29:54

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[1] A: He was a leader in the organization, but
[2] I'm not sure if during the time I was there he was
[3] the president or someone else, but he was in the—
[4] Q: He was active?
[5] A: Yes.
[6] Q: And he's the same Omar Ahmad who became
[7] the chairman of your organization. Correct?
[8] A: Correct.
[9] Q: And who is Yasser Saleh? Do you know
[10] that name?
[11] A: Yes.
[12] Q: Was he active at IAP when you were
[13] there?
[14] A: I think more active Omar Ahmad than
[15] Yasser, but I mix the two who was in charge.
[16] Q: Is Yasser Saleh know as known Yasser
[17] Bushnaq?
[18] A: To my knowledge, yes.
[19] Q: Yes. And he's been quite active in IAP
[20] many years; is that correct?
[21] A: That's my impression when I was there.
[22] Q: Has he been active in your organization

1—12:29:55 22—12:30:43

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[1] as well?
[2] A: No.
[3] Q: Do you know Rasmi Almallahma?
[4] A: During my stay there, yes.
[5] Q: What was he doing at IAP when you were
[6] there?
[7] A: He was just a business man. I'm not
[8] sure if he played any official role with the
[9] organization.
[10] Q: You said, though, that he was there. Do
[11] you recall specifically dealing with him on IAP
[12] matters?
[13] A: No.
[14] Q: So what does it mean to be there?
[15] A: As I said, he's known to the community
[16] and to the organization.
[17] Q: As an activist; is that what you're
[18] saying?
[19] A: Yes.
[20] Q: Did he provide you with any direction or
[21] advice on how you should perform your job?
[22] A: No.

1—12:30:50 22—12:31:26

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[1] Q: Ghassan Al Madani, who is he?
[2] A: I don't know.
[3] Q: That name is not familiar to you?
[4] A: No.
[5] Q: So you wouldn't have known whether he
[6] was active at IAP when you were there?
[7] A: No.
[8] Q: What about—
[9] A: Can I ask a question to make it shorter?
[10] Q: All right.
[11] A: Can you tell me what year is this?
[12] Q: This is a copulation over the years.
[13] A: Okay.
[14] Q: It's hard for us to tell when people are
[15] active or not. We're asking you so we can get an
[16] idea of creating a time frame for ourselves.
[17] A: Okay.
[18] Q: That's our problem.
[19] MR. BOYD: This is not an IAP document?
[20] This is your document?
[21] MR. LANDES: This is a document we put
[22] together.

1--12:31:26 22--12:32:05

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[1] MR. OPPENHEIM: Work product.
 [2] MR. BOYD: Well, was work product.
 [3] MR. LANDES: It's just for the ease of
 [4] trying to move the deposition along to create a
 [5] list.
 [6] BY MR. LANDES:
 [7] Q: Where are we up to?
 [8] MR. BOYD: Well, you know, I don't know
 [9] about the accuracy of the list, and I'm just going
 [10] to put an objection on the record and leave it
 [11] there that this is testimony in a sense—
 [12] MR. LANDES: Right. And it's just a
 [13] effort to—
 [14] MR. BODY: I don't know that it's
 [15] accurate, and to the extent that it's inaccurate, I
 [16] object.
 [17] MR. LANDES: Okay. I'm sure you'd
 [18] agree, Mr. Boyd, that we get a lot of names thrown
 [19] at us, and it's very hard to keep track of who the
 [20] people are and where they are and what organization
 [21] they're with and when they were there. That's what
 [22] we're trying to find out.

1--12:32:06 22--12:32:49

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[1] MR. BOYD: Okay. No. The only
 [2] reason—my principal objection is because you're
 [3] handing this to the witness and asking him to
 [4] accept your representation that all these people
 [5] held the offices that this document reflects, and
 [6] it may be perfectly accurate as far as I know, but
 [7] I have no idea, and unless the witness knows—
 [8] MR. LANDES: Fine. Ultimately, we'll
 [9] find out.
 [10] BY MR. LANDES:
 [11] Q: We're up to do—did we do Ghassan Al
 [12] Madani? Did you answer that?
 [13] A: Yes.
 [14] Q: I think you said you didn't know him.
 [15] A: No.
 [16] Q: Did you know Mohammad Abbas?
 [17] A: No.
 [18] Q: That's not the same Abbas who was in the
 [19] newspapers a lot lately, I assume.
 [20] A: I think that's—
 [21] Q: Okay. But this is not a person who is
 [22] known to you when you were at IAP or subsequent

1--12:32:52 22--12:33:44

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[1] thereto?
 [2] A: I don't recall it.
 [3] Q: Okay. Abdul Rahman?
 [4] A: That's like John.
 [5] Q: Is that John Smith?
 [6] A: No. That's like John.
 [7] Q: John, period?
 [8] A: Yeah.
 [9] Q: Yeah. Okay. All right. How about
 [10] Abdul Rahman Barakji, Barakju, B-A-R-A-K-J-I?
 [11] A: Yes.
 [12] Q: Is that a person who was at IAP when you
 [13] were there?
 [14] A: I don't remember.
 [15] Q: All right. In what context do you know
 [16] him?
 [17] A: I think he was an active member of the
 [18] community in California.
 [19] Q: Was he a member of IAP as far as you
 [20] know?
 [21] A: Probably, but I'm not sure.
 [22] Q: So you have no personal knowledge?

1--12:33:46 22--12:34:25

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[1] A: No.
 [2] Q: Do you know whether he was active, say,
 [3] in the Holy Land Foundation.
 [4] A: Not to my knowledge.
 [5] Q: What about Ismail El Barasse?
 [6] A: Yes.
 [7] Q: All right. And he's—what's your
 [8] contact with him?
 [9] A: Can you be specific?
 [10] Q: Was he a participant at IAP when you
 [11] were there?
 [12] A: I don't recall that.
 [13] Q: Okay. Then how do you know Mr. El
 [14] Barasse? Do you know him personally? Let me ask
 [15] you that.
 [16] A: He lived in Virginia.
 [17] Q: All right. And do you know when he
 [18] lived in Virginia?
 [19] A: Until recently, I think.
 [20] Q: Until fairly recently?
 [21] A: Or now.
 [22] Q: Do you know whether he held any

1—12:34:27 22—12:35:30

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[1] positions with any Islamic or Arab organizations?

[2] : Not to my knowledge.

[3] Q: Okay. How is it that you claim to know
[4] him?

[5] A: He is a known person at the mosque I
[6] used to attend in Virginia.

[7] Q: Which mosque is that, sir?

[8] A: [Indiscernible].

[9] Q: Okay. And he just was a member or a
[10] coworshipper of yours in the mosque?

[11] A: Yes.

[12] Q: Did you have any contact with him in the
[13] context of any of the organizations you've been
[14] involved in?

[15] A: No.

[16] Q: Have you ever heard any claim that Mr.
[17] Barasse was a colleague of Musa Abu Marzook's?

[18] A: From people.

[19] Q: Do you know that personally?

[20] A: What do you mean?

[21] Q: Did Mr. Barasse ever tell you personally
[22] that he worked with Marzook?

1—12:35:38 22—12:36:25

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[1] A: No.

[2] Q: Did Mr. Barasse ever tell you that he
[3] had personal involvement Muhammad Saleh? Do you
[4] know who Muhammad Saleh is?

[5] A: No.

[6] Q: Do you know person named Muhammad Saleh?

[7] A: No.

[8] Q: Never heard of him?

[9] A: Just in the past few days.

[10] Q: Did you know that Muhammad Saleh was an
[11] individual we allege in our complaint—I'll just
[12] put in a note—that he's an individual in Chicago
[13] who traveled to Israel and occupied territories in
[14] 1992 and 1993 and was arrested for having directed
[15] money to Hamas operatives. That's alleged in our
[16] complaint, and he was convicted of that in Israel
[17] and returned to the United States and lives in the
[18] Chicago area, in fact, gave him his deposition in
[19] this case. He's one of the defendants.

[20] So the first question I have is do you
[21] know Muhammad Saleh?

[22] A: No.

1—12:36:26 22—12:37:13

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[1] Q: You've never met him?

[2] A: No.

[3] Q: Never heard about his case?

[4] A: Just in the past few days.

[5] Q: Okay. So you wouldn't know whether he
[6] had a relationship with Ismail El Barasse?

[7] A: No.

[8] Q: Mr. Barasse has never said anything to
[9] you about Muhammad Saleh?

[10] A: No.

[11] Q: Never said anything to you about the
[12] fact that Muhammad Saleh was convicted of a crime
[13] in Israel and that there is something unjust about
[14] it?

[15] A: My knowledge of Mr. Barasse is limited.

[16] Q: Okay. What about did you ever at CAIR
[17] conduct any campaign on behalf of Muhammad Saleh?

[18] A: Never.

[19] Q: When you were at IAP, Mr. Saleh was then
[20] in prison in Israel, and my question is did you as
[21] the spokesman for IAP ever become involved in
[22] conducting any campaign trying to secure his

1—12:37:17 22—12:38:16

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[1] release and having to do with his imprisonment?

[2] A: Never to my knowledge.

[3] Q: So if I were to show—we can shorten
[4] this—different documents that IAP prepared during
[5] the period of Mr. Saleh's incarceration and when he
[6] came back to the United States, this is something
[7] you would have no recollection of sitting here
[8] today?

[9] A: I don't know. I don't have a
[10] recollection.

[11] Q: You did not work on the Saleh campaign?

[12] A: I don't remember that.

[13] Q: Just again to refresh your recollection,
[14] when Mr. Saleh was arrested, he was a United States
[15] citizen, and his arrest drew very great attention
[16] from Senator Paul Simon of Illinois. You've
[17] probably heard of Senator Paul Simon.

[18] A: Yes.

[19] Q: Did you have anything to do at IAP or at
[20] care in terms of dealing with Senator Simons'
[21] office with respect to Muhammad Saleh?

[22] A: You asked me two questions.

1—12:38:16 22—12:39:05

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[1] Q: Okay.

[2] A: Can you ask them one by one?

[3] MR. LANDES: Okay. Let's repeat it.

[4] [Whereupon, the pending question was

[5] read back by the court reporter.]

[6] THE WITNESS: I don't remember that.

[7] BY MR. LANDES:

[8] Q: Let me divide it. When you were at IAP,

[9] I think your testimony is you had nothing to do

[10] with the campaign on behalf of Muhammad Saleh?

[11] A: I don't remember that.

[12] Q: You don't remember that? Okay. When

[13] you were at CAIR, did you have any anything to do

[14] with attempting to advocate on behalf of Muhammad

[15] Saleh?

[16] A: I don't believe so.

[17] Q: But you don't remember?

[18] A: I know the history of this organization

[19] that I worked in, CAIR, very well.

[20] Q: Right.

[21] A: So the answer is no.

[22] Q: So the answer for CAIR is no?

1—12:39:06 22—12:39:41

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[1] A: Yes.

[2] Q: And the answer for IAP is you don't

[3] recall?

[4] A: I don't remember. Mostly likely, no.

[5] Q: Do you know a person named Tawfeeq

[6] El-Deek?

[7] A: No.

[8] Q: So you had no contact with him at IAP?

[9] A: No.

[10] Q: And you've had obviously no contact with

[11] him since then?

[12] A: That's true.

[13] Q: Okay. What about Kifah Mustapha; do you

[14] know that person?

[15] A: Yes.

[16] Q: Who was that person?

[17] A: He's an active member of the community

[18] in Chicago.

[19] Q: Okay. Was that a person you dealt with

[20] when you were at IAP?

[21] A: No.

[22] Q: Is that a person you dealt subsequently?

1—12:39:43 22—12:40:22

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[1] A: When I say no, that means I don't

[2] remember.

[3] Q: Okay. I think your counsel would agree

[4] that when you say no, it's no, and you don't

[5] remember, you don't remember. I think you probably

[6] should tell us which one that means.

[7] A: I'm speaking to the Court and—

[8] Q: Well, just on the record, it's better

[9] for you and better for us.

[10] A: Sure.

[11] Q: Let's go back. Let's start again with

[12] Kifah Mustafa. Did you have anything to do with

[13] Kifah Mustafa when you were at IAP?

[14] A: I don't remember.

[15] Q: Okay. What about subsequently thereto?

[16] A: I know he's an active member of the

[17] community in Chicago.

[18] Q: Did you deal with him directly?

[19] A: No.

[20] Q: So you have no knowledge about anything

[21] he's done for IAP?

[22] A: That's true.

1—12:40:24 22—12:41:12

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[1] Q: What about Hassan Sabri?

[2] A: Yes.

[3] Q: Who is that?

[4] A: He was an employee by IAP.

[5] Q: At the time you were an employee?

[6] A: Yes.

[7] Q: What was his—

[8] A: I remember that.

[9] Q: Do you remember what his job was?

[10] A: I think he was working on functions and

[11] speakers.

[12] Q: Speakers for like conventions and things

[13] of that nature?

[14] A: Yes, probably.

[15] Q: Did he ever discuss with you the events

[16] he was planning to do?

[17] A: If it has to do with my work, probably.

[18] Q: You didn't help him plan the

[19] conventions?

[20] A: No.

[21] Q: Okay. Have you had contact with him

[22] since you left IAP?

1—12:41:13 22—12:42:02

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[1] A: No.
[2] Q: Okay. And Sabri Samirah, do you know
[3] that gentleman?
[4] A: Yes.
[5] Q: Did you know him when you were at IAP?
[6] A: Yes.
[7] Q: What was his role at IAP when you were
[8] there?
[9] A: I don't remember his role, but I
[10] remember him being active.
[11] Q: He was located in the Chicago area?
[12] A: I don't know exactly where he lived
[13] then.
[14] Q: What was his involvement with IAP when
[15] you were there?
[16] A: I don't remember exactly, but I had the
[17] impression that he was active.
[18] Q: After you left, did you have contact
[19] with him?
[20] A: No.
[21] Q: So when he was at IAP—after you left
[22] IAP, your testimony is Sabri Samirah, you had no

1—12:42:02 22—12:42:38

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[1] contact with him?
[2] A: He was an active member of the community
[3] in Chicago.
[4] Q: Okay. Was he a member of your
[5] organization, CAIR?
[6] A: I don't think so.
[7] Q: So you didn't work with him on CAIR
[8] projects?
[9] A: No.
[10] Q: Is that the same Sabri Samirah who
[11] apparently cannot get re-admitted to the United
[12] States at the present time?
[13] A: That's what I read in the newspapers.
[14] Q: Did CAIR advocate on behalf of him?
[15] A: I don't think so.
[16] Q: Okay. Are you familiar with what the
[17] allegations are against Sabri Samirah?
[18] A: No.
[19] Q: So you wouldn't know if there's any
[20] is to the facts that are alleged against him?
[21] A: I have no knowledge of these details.
[22] Q: Okay. What about Youssef Shahin?

1—12:42:41 22—12:43:31

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[1] A: I don't know him.
[2] Q: Never heard of him?
[3] A: No.
[4] Q: And you're next, so we can skip you.
[5] A: Well, that's me.
[6] Q: Okay. Who is Mohammad Al-Hassan?
[7] A: As it states here, editor of the Muslim
[8] World Monitor.
[9] Q: Okay. What is the Muslim World Monitor?
[10] A: A publication published by—newspaper
[11] published by IAP.
[12] Q: Now, I'm asking you—all right. Now, do
[13] you know that of your own personal knowledge or
[14] because it's on this list?
[15] A: I remember working with him.
[16] Q: What was his responsibility?
[17] A: Writing news items and editing the
[18] newspaper.
[19] Q: He is the person who was really in
[20] charge of that publication?
[21] A: Mostly, yes.
[22] Q: Is that publication published in

1—12:43:33 22—12:44:05

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[1] English?
[2] A: Yes.
[3] Q: Now, when you say it's published in
[4] English, is it a publication that essentially takes
[5] an Arabic publication and translates it to English,
[6] or is it its own publication that writes the
[7] articles in English?
[8] A: Mostly English.
[9] Q: Okay. Did you have anything to do with
[10] that publication when you worked at IAP?
[11] A: I wrote a couple of stories, I remember.
[12] Q: Do you recall what they were?
[13] A: Yes.
[14] Q: About what?
[15] A: About a con artist.
[16] Q: Sorry?
[17] A: Con artist.
[18] Q: Con artists?
[19] A: Yes.
[20] Q: Telling people to be careful and not to
[21] get fooled, that type of thing?
[22] A: Yes.

1—12:44:05 22—12:44:49

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- [1] Q: Consumer-oriented types of things?
[2] A: He used to claim that he's a scholar,
[3] coming to airports and wants people to help him and
[4] he's been stranded in airports, and he wants people
[5] to wire him money.
[6] Q: In other words, somebody would come and
[7] pretend to be something they weren't and try to get
[8] people to give donations?
[9] A: So that was brought to my attention
[10] and—
[11] Q: You didn't write about political things?
[12] A: No.
[13] Q: Just consumer things?
[14] A: Not that either.
[15] Q: Do you know where we could get a
[16] complete set of the Muslim World Monitor? Are
[17] copies kept anywhere that you're aware of?
[18] A: I don't know.
[19] Q: You don't know?
[20] A: No.
[21] Q: You don't have them?
[22] A: I don't have a single issue.

1—12:44:50 22—12:45:33

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- [1] Q: Not a single one?
[2] A: No.
[3] Q: Okay. Do you happen to know when you
[4] were there, did Mohammad Al-Hassan, did he report
[5] to anyone? Is there like a publisher of the
[6] magazine?
[7] A: Mainly to the office manager.
[8] Q: Mr. Dahduli?
[9] A: To my knowledge.
[10] Q: If somebody said to Mr. Al-Hassan that
[11] we don't like what you wrote or you shouldn't be
[12] doing something, who would that have been?
[13] A: Mainly the office manager.
[14] Q: Dahduli?
[15] A: Yes.
[16] Q: Have you ever become aware of any
[17] disputes Mohammad Al-Hassan had with the people who
[18] were charge at IAP with respect to his
[19] publications?
[20] A: I don't remember.
[21] Q: You don't know? You just don't
[22] remember?

1—12:45:36 22—12:46:41

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- [1] A: It's coming about nine years ago.
[2] Q: Okay. Do you—so you have no knowledge
[3] that anybody called him on the carpet or said to
[4] him we don't like what you're doing; you're writing
[5] articles that you shouldn't be writing?
[6] A: I cannot say yes or no.
[7] Q: You just don't know personally?
[8] A: I don't remember.
[9] Q: Okay. Now, who is Sabro Obrajo? Is he
[10] the editor of Al-Zaitonah?
[11] A: I thought you asked me this, about this
[12] guy.
[13] Q: I asked you about Sabri—I haven't asked
[14] you about Sabri Ibrahim, editor
[15] Al-Zaitonah-Chicago?
[16] A: I'm not sure if you're talking about the
[17] same person.
[18] Q: Could he also be Sabri Samirah?
[19] A: Probably. I'm not sure.
[20] Q: Did you know Sabri Samirah to be the
[21] editor of Al-Zaitonah?
[22] A: I don't remember.

1—12:46:42 22—12:47:26

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- [1] Q: What is Al-Zaitonah?
[2] A: An Arabic newspaper published by IAP.
[3] Q: And do you know was it published at the
[4] time that you were working at IAP?
[5] A: I believe so.
[6] Q: Okay. Did you have anything to do with
[7] Al-Zaitonah?
[8] A: That particular story, I was following
[9] throughout the year.
[10] Q: Which story?
[11] A: The con artist story.
[12] Q: So you wrote both in the English
[13] publication and the Arabic publication?
[14] A: Right.
[15] Q: Anything else?
[16] A: That's it.
[17] Q: Okay. So if we found issues of
[18] Al-Zaitonah from then—
[19] A: To my recollection, that's the main
[20] story I worked and I followed until now.
[21] Q: So you still work on that?
[22] A: Right.

1—12:47:26 22—12:48:04

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[1] Q: It still happens?
[2] A: Correct.
[3] Q: Okay. Now, but you're saying you think
[4] that Sabri Ibrahim and Sabri Samirah are the same
[5] people?
[6] A: I'm not sure.
[7] Q: Did you know Sabri Samirah to be—well,
[8] you said you wrote articles for Al-Zaitonah. Who
[9] did you give them to?
[10] A: Can you restate the question?
[11] Q: You said—I mean, just maybe to try to
[12] refresh your recollection, you said you wrote
[13] articles for Al-Zaitonah.
[14] A: I know the person Sabri.
[15] Q: Sabri, you did know him?
[16] A: His last name is either Samirah or
[17] Ibrahim. I remember a person who was active the
[18] way I described it to you.
[19] Q: Was he based in Chicago?
[20] A: Probably.
[21] Q: You just don't remember?
[22] A: I don't know exactly.

1—12:48:10 22—12:48:43

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[1] Q: Now, there's someone named Salah Hassan,
[2] editor, Ila Falastin. Do you know that person?
[3] A: No.
[4] Q: Had you ever heard of a publication
[5] called Ila Falastin?
[6] A: I heard it.
[7] Q: What is it?
[8] A: Just in the past few days.
[9] Q: Never heard of it before?
[10] A: I don't remember?
[11] Q: Is it—what do you know about now?
[12] A: Just it was allegedly a publication of
[13] IAP.
[14] Q: Did you learn it from reading Mr.
[15] Ahmad's deposition transcript?
[16] A: Yes.
[17] Q: Mr. Ahmad testified he never heard of
[18] it.
[19] A: Well, that's my answer.
[20] Q: So you never heard of it either?
[21] A: Yes.
[22] Q: Aside from—aside from reading the

1—12:48:45 22—12:49:42

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[1] transcript of Mr. Ahmad's deposition, it's your
[2] testimony that you never heard of a publication Ila
[3] Falastin?
[4] A: That's correct.
[5] Q: As far as you know, IAP—you don't know
[6] whether IAP did or did not publish Ila Falastin?
[7] A: Again, my engagement with the
[8] organization was for one year, and I don't remember
[9] that, seeing that publication or being published
[10] during the time I served in the organization.
[11] Q: Now, but before you went to work for
[12] IAP, did you ever come across a magazine called Ila
[13] Falastin?
[14] A: No.
[15] Q: Okay. So you have zero knowledge about
[16] Ila Falastin?
[17] A: That's true.
[18] Q: You wouldn't know who wrote it, who
[19] published it, who edited it?
[20] A: That's true.
[21] Q: Okay. Did you ever hear of a
[22] publication called Ila Falastin Muslima?

1—12:49:42 22—12:50:19

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[1] A: Yes.
[2] Q: What is that publication?
[3] A: I used to see it at IAP.
[4] Q: Okay. And do you know who wrote that
[5] publication?
[6] A: I don't remember.
[7] Q: Is that a publication that was published
[8] in Europe.
[9] A: I believe so.
[10] Q: Do you know whether IAP had anything to
[11] do with that publication?
[12] A: I have no knowledge.
[13] Q: Do you don't know whether IAP was
[14] responsible for distributing that publication in
[15] the United States?
[16] A: I'm not sure, but I used to see, you
[17] know, some copies there.
[18] Q: They were in the office?
[19] A: Yes.
[20] Q: Did you subscribe to it personally?
[21] A: No.
[22] Q: So you wouldn't be able to know one way

1—12:50:22 22—12:51:11

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[1] or the other who published that magazine?
[2] **A:** That's correct.
[3] **Q:** Now, they give another name after that,
[4] Usama Ahmed AKA Usama Muhammad, editor,
[5] Al-Zaitonah. Do you know that person?
[6] **A:** Yes.
[7] **Q:** Who is that?
[8] **A:** The editor of the Arabic version or the
[9] Arabic newspaper Al-Zaitonah.
[10] **Q:** There's one Al-Zaitonah. Right? It's
[11] always been in Arabic. Right?
[12] **A:** To my knowledge.
[13] **Q:** Okay. There's not an English version?
[14] **A:** I don't know. Then, I know it was in
[15] Arabic.
[16] **Q:** Okay. And was—let me just make sure
[17] we've got all the names here: Usama Ahmad AKA
[18] Usama Muhammad. Do you know him by any other
[19] names?
[20] **A:** I just—
[21] **Q:** Because those seem to be fairly common
[22] names.

1—12:51:12 22—12:52:01

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[1] **A:** I know Usama.
[2] **Q:** That is Usama?
[3] **A:** Yes.
[4] **Q:** Okay. Now he's a person who was very
[5] active in IAP. Correct?
[6] **A:** I know that he was editor of the
[7] newspaper.
[8] **Q:** Do you know whether he also president of
[9] IAP at any time?
[10] **A:** Not to my knowledge.
[11] **Q:** Was he also known as Zaher Salman?
[12] **A:** I don't know.
[13] **Q:** You don't know? Is that name familiar
[14] to you, Zaher, Z-A-Y-E-R—
[15] **A:** No.
[16] **Q:** Z-A-H-E-R, S-A-L-M-A-N?
[17] **A:** No.
[18] **Q:** You never heard of that name?
[19] **A:** No.
[20] **Q:** You've never heard that name as Usama
[21] Ahmad?
[22] **A:** That's true.

1—12:52:03 22—12:52:57

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[1] **Q:** And Usama is sometimes Osama. Right?
[2] **A:** Osama?
[3] **Q:** I mean because we see it different
[4] spellings. Okay. Now, what's your contact been
[5] with him since you left IAP?
[6] **A:** None.
[7] **Q:** Okay. What about Ghassan Saleh, also
[8] publisher Al-Zaitonah and Muslim World Monitor?
[9] **A:** That was the office manager.
[10] **Q:** That's the same one?
[11] **A:** Correct.
[12] **Q:** As Dahduli?
[13] **A:** Right.
[14] **Q:** So he had a lot of roles? He was the
[15] office manager and the publisher?
[16] **A:** To my recollection, the organization was
[17] small and had very limited resources.
[18] **Q:** Okay. So people did a number of jobs?
[19] **A:** Probably.
[20] **Q:** Okay. Did anybody ever tell you how
[21] these publications sustained themselves
[22] financially?

1—12:53:01 22—12:53:46

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[1] **A:** No. Maybe through advertisement.
[2] **Q:** There were advertisements. Right?
[3] **A:** Yes.
[4] **Q:** Okay. And Ahmad Bin Yousef, do you know
[5] who that is?
[6] **A:** Yes.
[7] **Q:** Who is that?
[8] **A:** He's a researcher Washington or
[9] Virginia.
[10] **Q:** Is he currently working for IAP as far
[11] as you know?
[12] **A:** I don't know.
[13] **Q:** Now, at the time you were at IAP, that
[14] was probably before they had a website; is that
[15] correct?
[16] **A:** I don't remember.
[17] **Q:** You don't remember?
[18] **A:** I don't remember having a website when I
[19] was working for them.
[20] **Q:** Okay. Let me ask you this: I've given
[21] you a long list of names, and I appreciate the
[22] patience you've taken in going through them, and I

1—12:53:46 22—12:54:36

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[1] think they're very helpful to us. Are there
[2] er—any other individuals who you recall having
[3] been on boards or advisory councils or employees of
[4] IAP at the time you worked there?

[5] **A:** I don't remember.

[6] **Q:** Nobody that we're missing as far as you
[7] know?

[8] **A:** I don't remember.

[9] **Q:** I mean, you worked there. You can think
[10] back to when—

[11] **A:** You're asking me nine years ago.

[12] **Q:** Well, we all had jobs nine years ago. I
[13] can probably tell you the names of some people I
[14] worked with.

[15] **A:** That was not an interest of me, of mine,
[16] to know who was doing what. I was doing just my
[17] work.

[18] **MR. LANDES:** Why don't we—let's take a
[19] lunch break.

[20] **VIDEOGRAPHER:** Okay. We're now going
[21] off the video record at 12:53 p.m.

[22] [Whereupon, at 12:53 p.m., a lunch

1—12:54:36 2—12:54:36

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[1] recess was taken, to reconvene at 2:30 p.m. this
[2] same day.]

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1—14:40:52 22—14:41:58

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AFTERNOON SESSION

[1] **VIDEOGRAPHER:** We're now back on the
[2] video record. The time is 2:40 p.m.

[3] **MR. LANDES:** All right. Resuming the
[4] deposition, Mr. Awad, just know you're still under
[5] oath. You don't have to do it again when you come
[6] back from lunch.

[7] I asked you before when CAIR was
[8] founded. We have here a document I'll give you. I
[9] just want to set some dates. It appears to be the
[10] certificate of incorporation of CAIR.

[11] Can you mark this please?

[12] [Awad Exhibit No. 8 was
[13] marked for identification.]

[14] **MR. McMAHON:** I don't want this to turn
[15] into a CAIR deposition. Obviously, he's not a
[16] representative of the place.

[17] **BY MR. LANDES:**

[18] **Q:** Do you see page 5 has different
[19] signatures and dates?

[20] **A:** Yes.

[21] **Q:** Yes? All right. Would it appear to

1—14:42:01 22—14:43:05

Page 160

[1] you, then, that CAIR was formed sometime on or
[2] about August 1994?

[3] **A:** What's the question?

[4] **Q:** I asked you before when CAIR was
[5] started.

[6] **A:** Yes.

[7] **Q:** The signatures on these articles of
[8] incorporation are August of '94. Correct?

[9] **A:** Yes.

[10] **Q:** Would it seem to you that that was about
[11] the time you started the organization?

[12] **A:** Correct.

[13] **Q:** Okay. Now, when you started—I'm sorry?

[14] **A:** Sometime before that, maybe a couple of
[15] months.

[16] **Q:** So sometime late or sometime in the
[17] summer?

[18] **A:** June.

[19] **Q:** Oh, June?

[20] **A:** Yeah.

[21] **Q:** Now, the incorporators of CAIR,

[22] according to page 4—well, and a couple of other

1—14:43:10 22—14:44:13

Page 161

[1] places—are Rafeeq Jaber, Omar Ahmad, and Nihad
[2] Awad, which is yourself. Correct?

[3] A: Yes.

[4] Q: At the time that you formed this
[5] corporation, each of you had some position with
[6] IAP; is that correct?

[7] A: I don't know if Rafeeq had any position
[8] with IAP.

[9] Q: But you did?

[10] A: When it was formed, no, it was none of
[11] us. I did not have any position with IAP.

[12] Q: When had you left IAP?

[13] A: Probably in May.

[14] Q: All right. Was it the most recent
[15] employment that you had before you came to CAIR?

[16] A: Yes.

[17] Q: Was it—was Mr. Ahmad an officer,
[18] director of IAP before he formed CAIR?

[19] A: I don't exactly remember what was his
[20] position, but I know he was active.

[21] Q: And you know—you testified that Mr.
[22] Jaber were active in IAP.

1—14:44:15 22—14:45:15

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[1] A: I don't recall exactly in what capacity,
[2] except I said he was known to me within IAP, but
[3] more so he was known me through his involvement and
[4] appearances in the larger conferences that I
[5] attend, including the Arab American Institute
[6] functions.

[7] Q: At the time you went to CAIR, did
[8] you—you had then severed all your relationship
[9] formally with IAP; is that correct?

[10] A: That's correct.

[11] Q: Did IAP as an organization provide
[12] you—provide CAIR with any assistance in forming
[13] that organization?

[14] A: No.

[15] Q: So they never gave CAIR any money?

[16] A: No.

[17] Q: Have they ever donated any money to
[18] CAIR?

[19] A: No.

[20] Q: Has there been any other relationship
[21] between CAIR and IAP?

[22] A: Not to my knowledge.

1—14:45:17 22—14:45:59

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[1] Q: Well, you would be the most

[2] knowledgeable person, wouldn't you?

[3] A: Not to my knowledge that IAP had a
[4] relationship with CAIR.

[5] Q: I'm not embarking on a deposition of
[6] CAIR here. I understand that, but just to make
[7] sure I understand, are you the most senior person
[8] in CAIR?

[9] A: No.

[10] Q: Who is?

[11] A: The board.

[12] Q: Okay. But in terms of people who work
[13] there every day, are you like the senior officer?

[14] A: I'm the executive director.

[15] Q: Okay. And you report to the board?

[16] A: Right.

[17] Q: You don't report to another individual
[18] ahead of you in some kind of an operational
[19] hierarchy?

[20] A: I report to the board.

[21] Q: So that means you'd be knowledgeable
[22] about relationships CAIR has had with other

1—14:46:02 22—14:46:48

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[1] organizations?

[2] A: I'm talking about the national office.

[3] Q: Are there more than one office?

[4] A: There are chapters and affiliates.

[5] Q: Are they independent?

[6] A: I don't have all the legal terms of what
[7] it means, you know, chapters, but they carry the
[8] name CAIR in their work and they do the work we do
[9] in Washington.

[10] Q: I'm sorry?

[11] A: They do similar work that we do in
[12] Washington.

[13] Q: Which is a civil rights organization?

[14] A: Advocacy organization.

[15] Q: So if there is a CAIR chapter in Texas,
[16] for example—is there one?

[17] A: I believe so.

[18] Q: Are they free to go out and do what they
[19] want?

[20] MR. McMAHON: I think you're intruding
[21] up CAIR organizational stuff.

[22] MR. LANDES: All right. Just one

1—14:46:49 22—14:47:31

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[1] question, just to get an idea.

[2] **THE WITNESS:** Your question is?

[3] **BY MR. LANDES:**

[4] **Q:** Just for example, if there is a CAIR
[5] organization in Texas, and just to know, are they
[6] free to do what they want in terms of representing
[7] CAIR, or do they have to run things by you?

[8] **MR. McMAHON:** I think that calls for a
[9] legal conclusion in part. To you best or your
[10] ability, you can answer.

[11] **MR. LANDES:** I'm just asking—don't
[12] testify. I'm just asking him—

[13] **MR. McMAHON:** That's a very serious
[14] question.

[15] **THE WITNESS:** The local offices just are
[16] independent within the state or the city they
[17] operate in.

[18] **BY MR. LANDES:**

[19] **Q:** Do you—does CAIR engage in any joint
[20] publications with IAP?

[21] **A:** Never.

[22] **Q:** Do you sponsor—

1—14:47:32 22—14:48:18

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[1] **A:** To my knowledge.

[2] **Q:** Do you sponsor any conventions with IAP?

[3] **A:** I don't recall any.

[4] **Q:** Have you participated in IAP conventions
[5] as a representative of CAIR?

[6] **A:** I don't remember any.

[7] **Q:** Ever spoken at an IAP convention since
[8] you left?

[9] **A:** I doubt it.

[10] **Q:** You don't remember?

[11] **A:** I don't remember.

[12] **Q:** Do you know whether any of your
[13] colleagues at CAIR have spoken at an IAP
[14] convention?

[15] **A:** I'd have to check.

[16] **Q:** How would—do you know whether Mr. Omar
[17] Ahmad has spoken at an IAP convention as a
[18] representative of CAIR?

[19] **A:** I don't track everyone's movement and
[20] appearances.

[21] **Q:** All right. Do you have any knowledge of
[22] an organization called American Muslim Society?

1—14:48:20 22—14:49:30

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[1] **A:** No.

[2] **Q:** Never heard of it?

[3] **A:** In just the past few days.

[4] **Q:** Okay. You never heard of AMS, American
[5] Muslim Society, as being a different way of
[6] speaking about IAP that—

[7] **A:** I don't remember anything.

[8] **Q:** Did you ever hear AMS being the IAP
[9] organization in Chicago?

[10] **A:** I don't recall that.

[11] **Q:** Now, is there a relationship between
[12] CAIR and HLF?

[13] **A:** No.

[14] **Q:** To your knowledge, does CAIR and HLF
[15] have any common officers or directors?

[16] **A:** Not to my knowledge.

[17] **Q:** Did they ever have common officers and
[18] director?

[19] **A:** Not to my knowledge.

[20] **Q:** There's been some controversy over
[21] whether HLF provided funds for the establishment of
[22] CAIR. I'm sure your familiar with that

1—14:49:32 22—14:51:16

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[1] controversy.

[2] **A:** Establishment of CAIR?

[3] **Q:** Well, whether HLF was an early donor to
[4] CAIR.

[5] **A:** I don't recall that.

[6] **Q:** Well, I think you sent testimony just a
[7] few weeks ago to the—I didn't make copies of this.

[8] I thought you'd be familiar with it—to Senator
[9] Kyle, the Senate Subcommittee on Terrorism. Are
[10] you familiar with that committee?

[11] **A:** Yes, I am.

[12] **Q:** And I believe that on September 9th, you
[13] sent in some testimony to his committee; isn't that
[14] correct?

[15] **A:** Yes, I did.

[16] **Q:** Okay. And in that testimony, you had
[17] a—

[18] [Telephone interruption.]

[19] VIDEOGRAPHER: We're now going off the
[20] video record at 2:49 p.m.

[21] [Recess.]

[22] VIDEOGRAPHER: We're now back on the

1—14:51:18 22—14:56:00

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[1] video record. The time is 2:50 p.m.

[2] **BY MR. LANDES:**

[3] **Q:** All right. Let me just go back. Do you
[4] recall that you sent testimony to Senator Kyle's
[5] committee last month?

[6] **A:** Yes, I did.

[7] **Q:** and Part of that testimony was in a form
[8] which you said myth and then fact. Do you recall
[9] that?

[10] **A:** Yes. I need to—

[11] **Q:** I'm sorry?

[12] **A:** I need to look at it.

[13] **MR. LANDES:** Fine. We'll copy this

[14] page. Off the record.

[15] **VIDEOGRAPHER:** We're now going off the
[16] video record at 2:51 p.m.

[17] [Recess.]

[18] **VIDEOGRAPHER:** We're now back on the
[19] video record. The time is 2:55 p.m.

[20] [Awad Exhibit No. 9 was
[21] marked for identification.]

[22] **MR. McMAHON:** Is this 9?

1—14:56:00 22—14:56:54

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[1] **BY MR. LANDES:**

[2] **Q:** Mr. Awad, let me hand you what's been
[3] marked by the court reporter as Exhibit 9. Have
[4] you seen this document before, sir?

[5] **A:** Yes, I did.

[6] **Q:** What is this document?

[7] **A:** It's testimony I submitted to the
[8] Congress.

[9] **Q:** Okay. So it is what I was talking to
[10] you about before. All right. And this is
[11] testimony you gave in writing on or about September
[12] 9th; is that correct?

[13] **A:** Yes.

[14] **Q:** The testimony is the letter—the cover
[15] letter is September 9th. The testimony is
[16] September 10. Correct?

[17] **A:** Yes.

[18] **Q:** Okay. Turn to page 19, please. Let me
[19] just ask you first, I mean, this does appear to be
[20] the document that you submitted; is that correct?

[21] **A:** Yes.

[22] **Q:** And you see that a quarter of the way

1—14:57:00 22—14:57:59

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[1] down the page, you see it says myth and then fact?

[2] **A:** Yes.

[3] **Q:** The myth: "In a recent Congressional
[4] hearing, Mr. Emerson proclaimed that CAIR received
[5] some of its initial seed from the Holy Land
[6] Foundation for relief and development." Do you see
[7] that?

[8] **A:** Yes, I see.

[9] **Q:** And then you say: "This is an outright
[10] lie." Do you see that?

[11] **A:** Yes.

[12] **Q:** Does that—did that turn out to actually
[13] be a correct statement on your part?

[14] **A:** I believe so.

[15] **Q:** Now, did CAIR receive any money from
[16] HLF?

[17] **A:** When you say seed money, it gives the
[18] impression of start-up money.

[19] **Q:** Right.

[20] **A:** I don't remember receiving money from
[21] HLF as start-up money or seed money.

[22] **Q:** How would you define? What's your

1—14:58:02 22—14:59:33

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[1] understanding of seed money?

[2] **A:** Seed money in my understanding is money
[3] that will start something. Seed is when you plant
[4] seed in the soil. Then something comes out of it.

[5] **Q:** I think a venture capitalist would say
[6] an early stage investment.

[7] **A:** That's my understanding of my second
[8] language, English.

[9] **MR. LANDES:** Okay. Just let me hand you
[10] this document, the next one.

[11] [Awad Exhibit No. 10 was
[12] marked for identification.]

[13] **BY MR. LANDES:**

[14] **Q:** Have you seen this before?

[15] **A:** Is this is a copy of—what is this a
[16] copy of?

[17] **Q:** This appears to be—it says wire
[18] transfer advice. Do you see that at the top?

[19] **A:** Yes.

[20] **Q:** Okay. Nations Bank, and if you look in
[21] the box here, it goes across. Right? It says
[22] sender, Bank One, Texas in Dallas, originator, Holy

[1] Land Foundation.

[2] **A:** Yes.

[3] **Q:** Beneficiary, CAIR, and the date up in

[4] the upper right-hand corner is 10-31-94.

[5] **A:** Yes.

[6] **Q:** So that would suggest to me, at least

[7] this document does, that in October of 1994, which

[8] is sometime in the first months of CAIR being

[9] started, that it got a \$5,000 check or wire

[10] transfer from the Holy Land Foundation.

[11] **MR. BOYD:** Object to form.

[12] **BY MR. LANDES:**

[13] **Q:** Is that correct?

[14] **A:** It says so here.

[15] **Q:** I'm sorry?

[16] **A:** It says so here.

[17] **Q:** Okay. Now does this refresh your

[18] recollection as to whether Holy Land Foundation

[19] gave any money to CAIR?

[20] **A:** I have to double check.

[21] **Q:** You've not seen this?

[22] **A:** This one? I don't remember seeing this.

[1] **Q:** Have you ever seen anything that

[2] suggested that Holy Land Foundation donated money

[3] to CAIR in 1994?

[4] **A:** I have to double check and see.

[5] **Q:** So sitting here today, you don't

[6] remember that?

[7] **A:** That takes me to nine years ago.

[8] **Q:** Okay. But you took the position in your

[9] testimony that the statement the CAIR received some

[10] of its initial seed money from the Holy Land

[11] Foundation was an outright lie, and you're telling

[12] me also you don't remember whether you got any

[13] money from HLF on October 31, 1994; is that

[14] correct?

[15] **A:** I stand by my statement in my

[16] understanding of the term "seed".

[17] **Q:** Okay.

[18] **A:** In my understanding of the term, it

[19] means start-up money. That means before the

[20] organization started, money was given, and I'm

[21] saying that was not true.

[22] **Q:** All right.

[1] **A:** If this is a true document, it would

[2] been months after that organization started, and I

[3] have to, of course, double check. So I cannot deny

[4] or say that this is a right document, but what I'm

[5] saying, the word "seed" does not apply to this in

[6] my understanding, and I stand by it when I say it

[7] is an outright lie. It meant money to start

[8] organization. The organization started and took

[9] off.

[10] **Q:** Okay. I don't want to get into the

[11] details of your organization.

[12] **A:** No. That's important to me, because I

[13] submitted this testimony to the Congress, and I

[14] stand by it, and I know that our organization is

[15] subject to a political smear campaign by Mr.

[16] Emerson.

[17] **Q:** Okay. And my question is we're

[18] interested in the Holy Land Foundation, what they

[19] do with their money, and my question is did they,

[20] in fact, give you money, and we found some evidence

[21] that they did, and we're talking about when or

[22] what, but it seems me that they did give you money.

[1] **A:** When and what is very important.

[2] **Q:** You're not denying that the Holy Land

[3] Foundation donated money to CAIR, though, are you?

[4] **A:** I'm looking at this document. Probably

[5] it did, and I have just to verify this with our

[6] records.

[7] **Q:** Fine. Is it simply because it's such a

[8] long time ago that you can't recall?

[9] **A:** That's, of course, an important factor,

[10] yes.

[11] **Q:** And is it also because you had large

[12] numbers of donors, and it's hard to remember who's

[13] giving what?

[14] **A:** That could be it, yes.

[15] **Q:** Let me just give you, then—in terms of

[16] the testimony, I think you also supplemented your

[17] testimony later; is that correct? To the

[18] Congressional committee.

[19] **A:** Yes.

[20] **MR. LANDES:** Let me hand this to you as

[21] well and ask that this be marked.

[22] **MR. McMAHON:** Is this 11?

1—15:03:47 22—15:06:16

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[1] [Awad Exhibit No. 11 was
[2] marked for identification.]
[3] MR. LANDES: It's a supplement—the
[4] front page says "Supplemental Testimony of Nihad
[5] Awad".

[6] [Witness peruses exhibit.]

[7] **BY MR. LANDES:**

[8] **Q:** Take a look at page 6, Item 5. Now, did
[9] you prepare this document, Mr. Awad?

[10] **A:** Can I read this?

[11] **Q:** Before you look at it, did you prepare
[12] this document?

[13] **A:** Can I read it, please?

[14] **Q:** Sure. Go ahead.

[15] [Witness peruses exhibit.]

[16] **THE WITNESS:** What's your question?

[17] **BY MR. LANDES:**

[18] **Q:** Did you—is this your testimony?

[19] **A:** Yes, it is.

[20] **Q:** You prepared this document?

[21] **A:** Not by myself.

[22] **Q:** But you read it before it was submitted

1—15:06:58 22—15:07:41

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[1] "seed".

[2]

BY MR. LANDES:

[3] **Q:** Right, but my question, putting "seed"
[4] aside, and I'm not here to quibble on that, that's
[5] not my—

[6] **A:** That's important to me.

[7] **Q:** That's important to you. I understand.

[8] **A:** Because it's sends the wrong impression
[9] to people.

[10] **Q:** But my only question is whether you
[11] received money from HLF in 1994, and it would seem
[12] from your supplemental testimony that you did.

[13] **A:** Definitely I did not pay attention to
[14] all the details of the testimony, and, you know, I
[15] stand by the statement, and I don't think there's
[16] any contradiction.

[17] **Q:** Okay. Fine.

[18] **A:** In my statement.

[19] **Q:** Now, you said you didn't get any money
[20] from IAP—the different defendants in this case
[21] and you didn't get any money that you—we've just
[22] covered HLF. Right?

1—15:06:18 22—15:06:53

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[1] to Congress?

[2] **A:** Yes, I did.

[3] **Q:** You take responsibility for this
[4] document, I assume.

[5] **A:** I had other people prepare for it me,
[6] but it was in a rush.

[7] **Q:** But it does say on the front page
[8] "Supplemental Testimony of Nihad Awad"?

[9] **A:** Correct.

[10] **Q:** That means ultimately you're
[11] responsible?

[12] **A:** No question.

[13] **Q:** Okay. All right. So does this change
[14] your testimony as to whether you received money
[15] from HLF during 1994?

[16] **MR. BOYD:** Object to the form of the
[17] question.

[18] **THE WITNESS:** By the time I prepared
[19] this, I did not have access to this.

[20] **MR. LANDES:** Right.

[21] **THE WITNESS:** So that did not change the
[22] content of my statement where I dispute the word

1—15:07:44 22—15:08:39

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[1] **A:** Repeat the question.

[2] **Q:** You said that CAIR did not receive any
[3] money from IAP.

[4] **A:** Not to my knowledge.

[5] **Q:** Okay.

[6] **A:** Not to my recollection.

[7] **Q:** We'll just talk about HLF. Did—

[8] **A:** Now, if you're presenting me with
[9] things, I can of course refresh my memory.

[10] **Q:** Of course. By all means. At any time
[11] did the former defendants in this case Musa Abu
[12] Marzook give any money to CAIR?

[13] **A:** I don't think so.

[14] **Q:** Do you know that? Are you pretty sure?

[15] **A:** Yes.

[16] **Q:** In 1994, it was before Mr. Marzook was
[17] incarcerated; isn't that true?

[18] **A:** I don't know.

[19] **Q:** Do you recall whether—I may have asked
[20] you this before. Then I'll skip it. I did ask you
[21] whether Marzook ever spoke at any IAP events that
[22] you attended, and I think your testimony was not to

1—15:08:42 22—15:09:47

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[1] my knowledge. Is that correct?
[2] : I don't know if you asked me that
[3] question.
[4] Q: But is that—what is your knowledge
[5] whether Marzook ever speak at any IAP events?
[6] A: I don't know.
[7] Q: Have you heard of—have you ever heard
[8] of an organization called United Association for
[9] Scholarship and Research, UASR?
[10] A: Scholarship and Research? No.
[11] Q: Studies and Research. I'm sorry.
[12] United Association for Studies and Research, UASR,
[13] have you heard of that organization?
[14] A: Yes, I did.
[15] Q: What is your knowledge of the purpose of
[16] that organization.
[17] A: I don't know exactly.
[18] Q: You don't know?
[19] A: Just except from its name, research and
[20] studies.
[21] Q: Okay. Have you—do you know a Mr. Ahmad
[22] Bin Yousef?

1—15:09:47 22—15:10:39

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[1] A: I answered that question. Yes.
[2] Q: Okay. And he's from UASR; is that
[3] correct?
[4] A: I believe so.
[5] Q: Did UASR do anything to help establish
[6] CAIR?
[7] A: I don't remember that.
[8] Q: Do you recall any representatives of
[9] UASR speaking at IAP conventions?
[10] A: I don't recall that.
[11] Q: Do you recall whether IAP made use of
[12] materials that UASR published?
[13] A: I have no recollection of that.
[14] Q: Do you know—do you have any knowledge
[15] as to what type of materials UASR does publish?
[16] A: You're asking me about IAP nine years
[17] ago?
[18] Q: No. I'm asking you about UASR just in
[19] general.
[20] A: I don't know the full scope of their
[21] work and what they do.
[22] Q: Have you ever heard of the Quranic

1—15:10:41 22—15:11:22

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[1] Literacy Institute?
[2] A: Just in the past few days.
[3] Q: Not before?
[4] Q: Just in terms of preparing for this
[5] case?
[6] A: Correct.
[7] Q: So you never heard of Mr. Haleem from
[8] the Quranic Literacy Institute?
[9] A: No.
[10] Q: Did you ever hear of a case that was
[11] brought in Chicago in connection with a mosque or
[12] real estate development that QLI was building that
[13] was the subject of litigation?
[14] A: No.
[15] Q: Have you ever heard of a person called
[16] Yasim Kadi?
[17] A: No. Again, just in the past few days.
[18] Q: All right. But not before that?
[19] A: No.
[20] Q: How did you hear about him? Just in
[21] terms of reading the pleadings in this case?
[22] A: From press reports.

1—15:11:23 22—15:12:32

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[1] Q: What type of press reports?
[2] A: Just the internet.
[3] Q: I'm sorry?
[4] A: Just internet reports.
[5] Q: So at the time—you never heard of a
[6] Muafak Foundation?
[7] A: No.
[8] Q: And you never heard—there was an
[9] article in the Wall Street Journal, I believe,
[10] within the past eight months that showed a whole of
[11] development of Kadi giving money to QLI, giving
[12] money to Saleh. You don't recall seeing that?
[13] A: I'm not a reader, frequent reader, of
[14] the Wall Street Journal.
[15] Q: So you know nothing about QLI?
[16] A: That's true.
[17] Q: All right. I asked you about Dr.
[18] Marzook. It's a fact, isn't it, that you did work
[19] towards attempting to secure his release from jail;
[20] isn't that true?
[21] A: Repeat the question.
[22] Q: Did you take a public position in favor

1—15:12:34 22—15:13:26

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{1} of Marzook when he was in the process of his
{2} extradition trial in New York?

{3} **A:** You'd have to refresh my memory exactly
{4} what I recollect.

{5} **Q:** Okay. Have you heard of Abu Musa
{6} Marzook?

{7} **A:** I didn't—I did answer that question by
{8} saying yes.

{9} **Q:** You did, yes. Did you ever hear the
{10} accusation this Musa Abu Marzook occupied the
{11} position of military head of Hamas?

{12} **A:** A few years ago, yes.

{13} **Q:** Did you hear about it—you say a few
{14} years ago. Did you hear about that in 1995 and
{15} 1996?

{16} **A:** I don't exactly remember the time, date.

{17} **Q:** Did you hear that actually in court
{18} papers there was evidence that Marzook admitted to
{19} be the military head of Hamas, which you haven't—

{20} **A:** I don't recall that.

{21} **Q:** Do you recall that there was trial in
{22} federal court in New York where Marzook was

1—15:13:29 22—15:14:10

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{1} trying to—there was an attempt to extradite
{2} Marzook to Israel? Do you recall that?

{3} **A:** Vaguely.

{4} **Q:** There was a trial that went on for many
{5} weeks, and I believe it was heavily covered in the
{6} press. You don't recall that?

{7} **A:** As I said, vaguely.

{8} **Q:** Okay. Have you ever heard of something
{9} called the Marzook legal fund?

{10} **A:** Yes.

{11} **Q:** What do you know about the Marzook legal
{12} fund.

{13} **A:** Maybe you know more about it than I do.

{14} **Q:** Sorry?

{15} **A:** You know about it more than I do.

{16} **Q:** I'm just asking you before I show you
{17} this if you remember it.

{18} **A:** Just probably a legal defense fund for
{19} me.

{20} **MR. LANDES:** Okay. Let me hand this to
{21} you as well.

{22} [Awad Exhibit No. 12 was

1—15:14:25 22—15:15:47

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{1} marked for identification.]

{2} **BY MR. LANDES:**

{3} **Q:** Take a look this. This is a document
{4} called "Justice Forum Newsletter, The Marzook Legal
{5} Fund", and I'll direct your attention to the first
{6} page, the column on the right about a press
{7} conference.

{8} **A:** Yes.

{9} **Q:** Do you remember participating in a press
{10} conference in favor of Dr. Marzook?

{11} **A:** Vaguely, yes.

{12} **Q:** Take a look at the third page, the
{13} second full paragraph. It says: "Nihad Awad
{14} wrapped up by making three points." Do you see
{15} that?

{16} **A:** Yes.

{17} **Q:** Take a minute and read it.

{18} [Witness peruses exhibit.]

{19} **MR. McMAHON:** Can you give me a proffer
{20} as to if he went on the record in support of Dr.
{21} Abu Marzook, whether as a political prisoner or
{22} otherwise, what does that have to do with your

1—15:15:50 22—15:16:25

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{1} lawsuit?

{2} **MR. LANDES:** I can explain it to you
{3} later, but I'm not going to get involved in
{4} proffers right now. You'll listen to the questions
{5} and you'll see. Marzook was a defendant in this
{6} case and would be a defendant in this case.

{7} **THE WITNESS:** Do you want me to read the
{8} whole thing?

{9} **MR. LANDES:** No. Just read the
{10} paragraph about yourself.

{11} **THE WITNESS:** Okay.

BY MR. LANDES:

{13} **Q:** Do you recall making these statements?

{14} **MR. McMAHON:** Starting with "wrapped up
{15} by making three points"?

{16} **MR. LANDES:** Yes.

{17} **THE WITNESS:** Probably, but I do not
{18} have a vivid recollection of it.

{19} **MR. LANDES:** Okay.

{20} **THE WITNESS:** Ask me a question.

BY MR. LANDES:

{22} **Q:** To ask you the question, in part Marzook

1—15:16:29 22—15:18:00

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[1] was charged with engaging a defendant in this case,
[2] hammad Saleh, to take money to support Hamas
[3] terrorists in Israel. Saleh is a defendant in this
[4] case. I asked you about him before, and we have
[5] your testimony. My question is when you made these
[6] statements, did you conduct any investigation to
[7] determine whether or not the case against Marzook
[8] had any merit?

[9] **A:** When I made that statement, apparently I
[10] made a political statement as a civil rights
[11] organization to make sure that there is due
[12] process. Second, I am entitled to that opinion
[13] that I made then. If I believe that his detention
[14] was politically motivated, that's within the realm
[15] of free speech in America, and as a leader in a
[16] civil rights movement in this case country, I am
[17] entitled to express my opinions.

[18] **Q:** I—

[19] **A:** Before the court of public opinion.

[20] **Q:** And I don't quarrel with that.

[21] **A:** Regardless of how accurate my point of
[22] view was, whether I did research or I did not.

1—15:18:07 22—15:19:03

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[1] **Q:** Okay. Fine. And that's really not
[2] where I'm headed. My question is in reaching this
[3] conclusion whether you conducted any investigation
[4] and discovered any facts that relate to whether or
[5] not Marzook conspired with Saleh to do acts in
[6] support of Hamas.

[7] **MR. BOYD:** Object to form.

[8] **MR. McMAHON:** That calls for a legal
[9] conclusion as to whether or not the Federal
[10] Government has suffer evidence. What do you want
[11] this man to opine on?

[12] **MR. LANDES:** You're telling him what to
[13] say, but I will restate the question.

[14] **BY MR. LANDES:**

[15] **Q:** This article, for example, talks about
[16] Marzooks wife, Nadia Al Elashi, being present at
[17] the press conference. Do you know a Nadia Al
[18] Elashi?

[19] **A:** I met her then.

[20] **Q:** In fact, she's related to, I think some
[21] of the Elashis I asked you about before. Do you
[22] know that.

1—15:19:04 22—15:19:55

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[1] **A:** I don't know these things.

[2] **Q:** Fine. Now, my question is whether in
[3] reaching the conclusions you reached, and I'm not
[4] quarrelling with your ability to express your
[5] opinion and your position as a civil rights leader,
[6] but since we don't have access to Mr. Marzook, and
[7] I don't think we have access to Ms. Elashi, my
[8] question is did you learn any facts in reaching
[9] that conclusion that shed any light on whether or
[10] not Marzook conspired or participated with or
[11] engaged Muhammad Saleh to provide funds in support
[12] of terrorism in Israel?

[13] **A:** No.

[14] **MR. McMAHON:** Before you answer that
[15] question—well, you did. It's not stated in this
[16] paragraph that he was of that view.

[17] **MR. LANDES:** I didn't suggest he was.

[18] **MR. McMAHON:** So you want him to
[19] speculate on some allegation that's in an
[20] indictment against Marzook?

[21] **MR. LANDES:** No. You haven't read—we
[22] have seen the files and the testimony in the

1—15:19:55 22—15:20:51

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[1] Marzook case. Okay?

[2] **MR. McMAHON:** Right.

[3] **MR. LANDES:** And we have seen, you know,
[4] all of it in the Saleh case. Okay? Saleh is a
[5] defendant here. Saleh has been accused and Marzook
[6] has been accused of working together to provide
[7] funds for terrorist acts. It goes to the heart of
[8] this lawsuit. It's obvious that this witness had
[9] contact with people who knew Marzook at or about
[10] the time that he was being brought to trial in
[11] Israel. He expressed an opinion. My question is
[12] did he do any factual research of his own that he
[13] could share us with us today in terms of whether or
[14] not Marzook participated with Saleh in doing what
[15] he was accused of having done.

[16] That's a simple question. It's a fair
[17] question. It's in the scope of discovery.

[18] **MR. McMAHON:** Since it's not one of the
[19] opinions that he expressed in this document, that's
[20] what I have issue with. You've give him Awad No.
[21] 12 and had him read this paragraph.

[22] **MR. LANDES:** You can read the whole

1—15:20:52 22—15:21:40

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[1] magazine if you'd like.

[2] MR. McMAHON: Well, it's not expressed
[3] in there that there's a potential link between this
[4] defendant and Marzook.

[5] Try to answer the question so we can get
[6] out of here. I guess you did answer it.

[7] MR. LANDES: He did answer the question.

[8] MR. McMAHON: So let's move on.

[9] MR. LANDES: That's good. You learned
[10] something about the case.

[11] MR. BOYD: By the way, for the record,
[12] if you consider whatever testimony it is you just
[13] referred to be evidence that's relevant to the Holy
[14] Land Foundation providing some sort of support to
[15] Hamas, I think you have an obligation to produce it
[16] to us, and I would ask that you do so.

[17] MR. LANDES: I don't know how that
[18] follows from this question.

[19] MR. BOYD: I'm sorry. I missed the
[20] first part.

[21] MR. LANDES: We're asking about Saleh
[22] here. What's your objection to this question?

1—15:21:44 22—15:22:34

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[1] MR. BOYD: I'm not objecting to the
[2] question. I'm stating on the record. I'm trying
[3] to say you have discovery obligations to us, and if
[4] you have that, I'm asking you for it.

[5] MR. LANDES: Yeah. You've asked for
[6] that before. We talked about that in front of the
[7] judge. Okay? We've been through that.

[8] MR. BOYD: Saleh's testimony?

[9] MR. LANDES: Saleh produced—and I don't
[10] want to use up their time.

[11] MR. BOYD: All right. Let's talk about
[12] it later.

[13] MR. LANDES: Saleh produced a large
[14] volume of documents in this case, okay, that talked
[15] about his incarceration and trial in Israel? Okay.
[16] His confession and everything else, that's what I
[17] was referring to, not documents we produced,
[18] documents Saleh produced.

[19] MR. BOYD: But you have them?

[20] MR. LANDES: I have them. The other
[21] defendant produced them. I assume that you were
[22] given access to the documents that the other

1—15:22:36 22—15:24:07

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[1] defendants produced in this litigation. If not,
[2] call Mary Roland and ask her for them. That's what
[3] I'm referring to.

[4] MR. BOYD: What I'm referring to is that
[5] we asked you for any documents that you thought
[6] supported those allegations. If you think they do,
[7] then I ask you to provide them, identify them and
[8] provide them.

[9] MR. LANDES: Well, let's just talk about
[10] that after, after this discovery—after this
[11] deposition.

BY MR. LANDES:

[12] Q: Mr. Awad, in October of 1993, did you
[13] attend a meeting in Philadelphia together with
[14] representatives of HLF, IAP, the Al Aqsa Fund, and
[15] other organizations?
[16] other organizations?

[17] A: I don't think so.

[18] Q: You said you don't think so?

[19] A: I don't remember.

[20] Q: Are you familiar with something called
[21] the Watson Report?
[22] A: No.

1—15:24:08 22—15:25:15

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[1] Q: Are you familiar with the litigation
[2] that's taking place or has taken place in the
[3] District of Columbia between Mr. Boyd's client, the
[4] Holy Land Foundation and the Federal Government
[5] concerning the fact that the funds of the Holy Land
[6] Foundation have been frozen?

[7] A: What's the question?

[8] Q: Are you familiar with the fact that
[9] there's been litigation pending?

[10] A: I know that the Holy Land Foundation's
[11] assets were frozen.

[12] Q: Okay. Now—

[13] A: I don't know a lot about the particulars
[14] of the case.

[15] Q: I'm sorry?

[16] A: I do not know a lot of the particulars
[17] of the case.

[18] Q: Okay. Is has been alleged that in
[19] October, October 1st through October 3, 1993, a
[20] meeting took place in Philadelphia, and among the
[21] participants in that meeting was Shukri Abu Baker,
[22] Abdelhaleem Al Ashqar, and you've testified I think

(1) that you know both of those individuals. Well, you
(2) identified you know Shukri Abu Baker.

(3) A: Yes.

(4) Q: Do you know a person named Abdelhaleem
(5) Al Ashqar?

(6) A: Yes.

(7) Q: Has he been involved in an organization
(8) called a Asqa Foundation?

(9) A: I don't know.

(10) Q: You don't know. Let's go back to your
(11) testimony, your supplemental testimony that's
(12) Exhibit No. 11.

(13) MR. McMAHON: Yeah. It's 11.

(14) MR. LANDES: And I ask you to turn to
(15) page 7. Look at page 7, item 7.

(16) [Witness peruses exhibit.]

(17) THE WITNESS: Yes. Your question?

(18) BY MR. LANDES:

(19) Q: All right. Do you know what this
(20) question is referring to that you're responding to
(21) or this quotation?

(22) A: When I—when we saw it, we contacted

(1) Omar Ahmad, and that was his explanation.

(2) Q: So Omar Ahmad prepared, essentially
(3) drafted this?

(4) A: No, he did not.

(5) Q: Or gave you the information you needed
(6) to respond?

(7) A: You know, we talked to him about it, and
(8) people within organization helped in this response.

(9) Q: Now, did you speak personally with Omar
(10) Ahmad about this response?

(11) A: I'm not sure if I did.

(12) Q: This is less than a month ago?

(13) A: That's true. Ask me three hours ago
(14) what I did exactly, and I wouldn't be able to tell
(15) you.

(16) Q: Do you recall any conversations with
(17) anybody making reference to FBI wire taps recorded
(18) in 1993 of a meeting in Philadelphia of a variety
(19) of Islamic and Muslim leaders?

(20) A: Just from the documents that were
(21) presented by the investigative project.

(22) Q: Nothing else?

(1) A: Not to my recollection.

(2) Q: Do you know someone named Muin Shabib?

(3) A: No.

(4) Q: Goes by the name Abu Muhammad?

(5) A: No.

(6) Q: Do you know somebody by the name of Muin
(7) Muhammad?

(8) A: No.

(9) Q: But you know Shukri Abu Baker?

(10) A: Yes.

(11) Q: And you know Ashqar?

(12) A: I know Ashqar because he lives in
(13) Virginia and he's a known person in the community.

(14) Q: Right. He's currently in jail?

(15) A: Yes.

(16) Q: In Chicago. On or about September of
(17) 1993, did you receive a phone call from Muin or
(18) Muhammad or Shukri or anybody else inviting you to
(19) attend a meeting in Philadelphia?

(20) A: You're asking me in '93?

(21) Q: '93.

(22) A: I don't remember.

(1) Q: You don't remember. Okay. At any time
(2) in the fall of '93, did you ever hear of the fact
(3) that a meeting was held in Philadelphia that was
(4) attended by representatives of the Islamic
(5) Association for Palenstine, the Holy Land
(6) Foundation, distinguished guests of the occupied
(7) territories and so on?

(8) A: No.

(9) MR. BOYD: Object to form.

(10) BY MR. LANDES:

(11) Q: SO as far as you know, any reports that
(12) there was a meeting of—and I'll give you a list of
(13) names and maybe that will refresh your
(14) recollection—is something you—in Philadelphia in
(15) the first week of October 1993, something you just
(16) know nothing about?

(17) A: I don't remember anything of this, and I
(18) never took interest even in knowing what it was.

(19) Q: Let me ask you this: How do you say
(20) Islamic Association for Palestine in Arabic?

(21) A: [Witness speaks in Arabic.]

(22) Q: Is that association?

1—15:31:40 22—15:33:22

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[1] A: Yes.
[2] Q: Can it also be translated union?
[3] A: Could be.
[4] Q: Okay. Have you ever heard Omar Ahmad to
[5] be referred to as Omar Yikya.
[6] A: I know him as Omar Ahmad only.
[7] Q: You've never heard him used as Omar
[8] Yikya?
[9] A: I don't remember.
[10] MR. LANDES: Okay. I'm going to hand
[11] you an exhibit. You can take time, No. 13.
[12] [Awad Exhibit No. 13 was
[13] marked for identification.]
[14] MR. LANDES: This is—
[15] THE WITNESS: Can I have some water,
[16] please?
[17] MR. LANDES: Sure.
[18] [Pause.]
[19] MR. LANDES: This is Exhibit 28 from a
[20] government report that's been introduced in the
[21] case Holy Land Foundation against Ashcroft, and it
[22] purports to be the FBI's report on a meeting him

1—15:33:28 22—15:34:44

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[1] and they're talking about October 1st through 3rd,
[2] 1993 in Philadelphia; and, you know, I think it
[3] would be very difficult for you to sit and read
[4] this in detail, but you can take time, as much as
[5] you need, just to see by going through this report
[6] if it refreshes your recollection, first as to
[7] whether you ever heard of such a meeting and,
[8] secondly, as to whether you attended that meeting.
[9] [Witness peruses exhibit.]
[10] MR. BOYD: I think for the sake of the
[11] record we ought to caution the witness that this
[12] does not purport to be a verbatim transcript.
[13] MR. LANDES: I never told him it was.
[14] MR. BOYD: Well, he might get the
[15] impression from looking at it, and I don't have—
[16] MR. McMAHON: What is it you want the
[17] witness to do ?
[18] MR. BOYD: I don't have any reason to
[19] believe that it's accurate.
[20] MR. LANDES: Well, that's your opinion.
[21] MR. BOYD: I understand. I'm sure you
[22] wouldn't intentionally offer him something that you

1—15:34:47 22—15:35:41

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[1] thought was inaccurate.
[2] MR. LANDES: No. I'm not vouching for
[3] it. We have that issue. We understand that.
[4] The witness testified that he never
[5] heard of such a meeting, and my question is if he
[6] looks at this FBI report about the meeting, whether
[7] it refreshes his recollection as to whether he was
[8] or heard about this meeting. That's all.
[9] MR. McMAHON: Where in this document do
[10] you want him look at? It would take us two hours
[11] to read this. I'm accepting your representation
[12] that this is an FBI report. Do you know who the
[13] author of this report is?
[14] MR. BOYD: It's anonymous.
[15] MR. LANDES: I don't know. It's
[16] submitted in the case. It's been referred to many
[17] articles. It's been referred to in lawsuits, and
[18] my question is to ask the witness whether he
[19] attended a meeting in October 1st to 3rd. If he
[20] says he didn't and he knows nothing about it,
[21] that's fine; that's his testimony. All I'm trying
[22] to do is in a variety of ways is to see by looking

1—15:35:42 22—15:36:34

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[1] at this and what the FBI purports to be a report of
[2] a meeting, whether it reminds him of going to such
[3] a meeting.
[4] MR. McMAHON: Where are the pages that
[5] reference Mr. Awad, for example? Why do we have to
[6] torturously going through this long document to
[7] find something? What is he supposed to do?
[8] MR. LANDES: Well, you know, he's an
[9] intelligent man. He can look at this and he can
[10] make a determination of whether it reminds him.
[11] MR. McMAHON: Seventy-eight pages.
[12] MR. LANDES: Right.
[13] MR. BOYD: I object to the form of the
[14] question, and—
[15] THE WITNESS: This is a huge document.
[16] MR. BOYD: —the method of the question.
[17] MR. LANDES: Fine. Then just tell me
[18] even—you can take time. You can take a half hour
[19] if you'd like, you know, and I can ask you, because
[20] it's important, whether this refresh your
[21] recollection as to whether you were at a meeting in
[22] Philadelphia October 1 through 3, 1993.

1—15:36:49 22—15:38:17

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[1] And to respond to your counsel's
[2] question, if you look at page 1413—
[3] MR. BOYD: Page what?
[4] MR. LANDES: It's page stamped, Bates
[5] stamped 1413.
[6] MR. OPPENHEIM: Page 16.
[7] MR. LANDES: Page 16 of the report.
[8] MR. McMAHON: 16.
[9] MR. LANDES: If you look about halfway
[10] down, it says speakers for the third session. Do
[11] you see the first session, second session, third
[12] session. Do you see that?

[13] MR. McMAHON: Speakers for the third
[14] session would include.

[15] MR. LANDES: Jawad, Abu Wahad, Ghassan,
[16] Saleh, Nihad, and Ahmad. Okay?

BY MR. LANDES:

[18] Q: If you look at page 18, there's also a
[19] reference to a Nihad, speakers of the third
[20] session, if you look one, two, three, four, five,
[21] six, seven lines from the top.

[22] A: Which page?

1—15:38:18 22—15:43:02

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[1] MR. McMAHON: 18, and the next one is
[2] what?

[3] MR. OPPENHEIM: 78.

[4] MR. LANDES: Second line from the top.

[5] MR. McMAHON: So do you want to state
[6] your question with specificity concerning pages 16,
[7] 18, and 78?

[8] MR. LANDES: The specific question is by
[9] looking at this document, looking at references to
[10] the name Nihad, and I understand this is ten years,
[11] almost exactly ten years ago, looking at the
[12] subject matters discussed, I will then after this
[13] ask the witness another question, the names of
[14] participants the government claims were there. My
[15] question is does he remember being at this meeting.

[16] [Witness peruses exhibit.]

[17] MR. McMAHON: Off the record.

[18] [Discussion held off the record.]

[19] [Witness further peruses exhibit.]

[20] MR. McMAHON: Is there a question
[21] pending?

[22] MR. LANDES: The witness is looking at

1—15:43:03 22—15:47:12

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[1] the document.

[2] MR. McMAHON: Okay.

[3] MR. BOYD: I take it you haven't
[4] persuaded anyone in the government to actually
[5] produce the tapes of the meeting?

[6] MR. LANDES: As you know, Mr. Boyd, we
[7] just sent out the subpoena.

[8] MR. BOYD: Oh, you did?

[9] MR. LANDES: Well, if we didn't—okay.

[10] I signed off on them. I don't know. If we
[11] haven't, then it's any day.

[12] MR. BOYD: Great. I'll be there routing
[13] you on.

[14] MR. OPPENHEIM: I'm pretty sure it went
[15] out Friday.

[16] MR. McMAHON: Did the government give
[17] all of its files to you?

[18] MR. LANDES: You know, is this on the
[19] record?

[20] MR. McMAHON: This is off the record.

[21] [Discussion held off the record.]

[22] BY MR. LANDES:

1—15:47:12 22—15:48:05

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[1] Q: Is this helping you at all, Mr. Awad?

[2] A: You gave me a very big document that I
[3] don't have any recollection of.

[4] Q: Well, I know you never saw the document
[5] before. The question then—I guess I'll repeat
[6] it—whether having looked at this, and I understand
[7] it's limited and you've never seen it before even
[8] though it's been in the public domain, whether this
[9] just reminds you whether you were at such series of
[10] meetings. That's all.

[11] A: No, I don't remember.

[12] Q: Okay. Let me try it a different way,
[13] just by giving you a list of names, and I'm not
[14] going to burden you like I did the last time, but
[15] we have put together—you saw there were many names
[16] listed in this document. Okay? And we've put
[17] together our own list. I was going to hand it out,
[18] but it's kind of marked up. But the government
[19] claims, and, you know, part of this is discovery
[20] and we want to find out about it too. All right?

[21] The government claims that this
[22] conference, that individuals who attended included

1—15:48:12 22—15:49:33

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[1] Ghassan Elashi, Omar Yikya, also known as Omar
[2] Ahmad, Abdul Rahman Barakji, Nihad last name
[3] unknown—you saw the name Nihad there, didn't give
[4] a last name, and that's why we're asking
[5] you—Ghassan Elashi, Shukri Abu Baker, Mohammad El
[6] Mezain. Do you know—I don't know if we mentioned
[7] that name. Is that a person you know?

[8] **A:** I've heard of him.

[9] **Q:** Abdul Jabbar Hamdan, Haitham Maghawri,

[10] Ghassan Elashi, I mentioned. Sorry. Ghassan
[11] Saleh, Ismail El Barasse, Hassan Sabri, Yasser
[12] Bushnaq, Muhammad Al Hanooti, Akram Kharroubi,
[13] Abdelhaleem Al Ashqar, Muin Shabib, Jamal Said, and
[14] Hisham Darwish, as well as Hiram Alareefi,
[15] Ahmad—no. Those people. This is a long names of
[16] people, many of whose names you've testified before
[17] are people you know. Correct?

[18] **A:** Yes.

[19] **Q:** Okay. Do does that refresh your
[20] recollection as to whether you attended that
[21] meeting?

[22] **A:** No.

1—15:49:33 22—15:50:47

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[1] **Q:** All right. Did you ever hear of any of
[2] report from anyone that a meeting was held in
[3] October of '93 to discuss what impact the Oslo
[4] Accords would have on Islamic organizations in the
[5] United States?

[6] **A:** I can't remember that.

[7] **Q:** Do you recall hearing any report of a
[8] meeting in which a decision was made by
[9] representatives of IAP, HLF, and the Al Aqsa
[10] Educational Fund to take steps to oppose the Oslo
[11] Accords and to work to the detriment of the
[12] Palestinian authority?

[13] **A:** I don't remember that.

[14] **Q:** You never heard that report?

[15] **A:** Just as I said, again, just in the past
[16] few days.

[17] **Q:** Did—I asked you before when we were
[18] referring to your testimony before, you know, a
[19] reference to a statement that Omar Ahmad was
[20] reported to having made at that meeting. Now, did
[21] Omar Ahmad ever ask you since the time of his
[22] deposition, which was May 31st of this year,

1—15:50:50 22—15:51:54

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[1] whether you recall having been at that meeting?

[2] **A:** No.

[3] **Q:** He didn't say somebody asked me about
[4] the meeting in Philadelphia in October of 1993, and
[5] I didn't remember being there; do you remember
[6] being there? Words to that effect, did he never
[7] ask you?

[8] **A:** I can't remember.

[9] **Q:** Did anybody ever tell you that—ever
[10] hear a report that Ghassan Elashi was asked whether
[11] he attended that meeting, and he said he didn't,
[12] but when he was shown receipts, hotel receipts of
[13] having been there, that that may have changed his
[14] view on that subject? Did anyone anybody ever tell
[15] you that?

[16] **A:** No.

[17] **Q:** Did you ever hear of a meeting in—or a
[18] meeting in Oxford, Mississippi in 1994 in which a
[19] decision was made that the Holy Land Foundation
[20] would become the primary fund-raising organization
[21] for Islamic causes in the United States as opposed
[22] to the Al Aqsa Foundation?

1—15:52:03 22—15:53:06

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[1] **MR. BOYD:** Object to the form of
[2] question. It's—I object to the form, and it
[3] assumes facts not in evidence.

[4] **BY MR. LANDES:**

[5] **Q:** Okay. Did you ever hear of a meeting
[6] that took place in Oxford, Mississippi on or about
[7] March 1, 1994 with Abdelhaleem Ashqar, Sheik Jamil
[8] Hamami, and Dr. Siam?

[9] **A:** No.

[10] **Q:** No one ever told you about that?

[11] **A:** No.

[12] **Q:** So you're unaware of any discussion that
[13] was held, then, concerning who would take the
[14] primary role for raising funds for the occupied
[15] territories in the United States?

[16] **A:** That's correct.

[17] **Q:** So you know nothing about that?

[18] **A:** No.

[19] **Q:** Had you heard about it before I asked
[20] you questions today?

[21] **A:** No.

[22] **Q:** Let me ask you this: You said, I think,

1—15:53:09 22—15:54:19

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[1] in reference to your supplemental testimony that
[2] I weren't the person who talked to Omar Ahmad
[3] about his purported quote at the 1993 meeting, that
[4] somebody on your staff had that conversation with
[5] him; is that correct?

[6] **A:** I believe so.

[7] **Q:** Do you know who that person was? Could
[8] you identify that person for us, please?

[9] **A:** Can you repeat the question?

[10] **Q:** You testified in reference to paragraph
[11] 7 on page 7 of your supplemental testimony at the
[12] Congressional committee that you did not collect
[13] the facts from Omar Ahmad that are reported on this
[14] document; is that correct?

[15] **A:** Maybe not directly. I don't exactly
[16] remember the procedure we followed, but definitely,
[17] I had the staffers who helped me put this document
[18] together.

[19] **Q:** But here's a quote that you have on page
[20] 7 and goes on to page 8, and you read it, in terms
[21] of the quote allegedly made by Omar Ahmad at this
[22] October 1993 meeting and a rebuttal. Right? Okay.

1—15:54:26 22—15:55:28

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[1] Who worked on preparing this testimony?

[2] **A:** This testimony was given on behalf of
[3] our organization.

[4] **Q:** I understand that.

[5] **A:** And put my name.

[6] **Q:** Right. But who collected the
[7] information to put this testimony together?

[8] **A:** Different people at the organization.

[9] **Q:** What are their names?

[10] **MR. McMAHON:** Would you tell me again—I
[11] hate to trouble you with this—but what relevance
[12] to the lawsuit is the identity of people at the
[13] CAIR staff level who worked on this report, the
[14] identify of those folks?

[15] **MR. LANDES:** Well, I'll tell you.

[16] **MR. McMAHON:** Are you now going to
[17] depose them?

[18] **MR. LANDES:** He'll understand the
[19] question. Mr. Ahmad testified at his deposition
[20] that he didn't recall the meeting. Okay? Now we
[21] have testimony in Congress from CAIR which
[22] purportedly reflects a quotation that Mr. Ahmad

1—15:55:31 22—15:56:21

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[1] made at that meeting that nobody seems to know
[2] anything about. I asked the witness, the head of
[3] the organization, how he came to make these
[4] comments about Mr. Ahmad's statement. He said he
[5] didn't collect that information.

[6] There are people who have had
[7] conversations with Mr. Ahmad about what appears to
[8] be his participation at this meeting. I want to
[9] ask them what he told them. I'm entitled to do
[10] there, because at the time of the meeting, Mr.
[11] Ahmad testified that he was the president of one of
[12] the defendant organizations and this meeting was a
[13] meeting that involved virtually all the defendants
[14] in this case.

[15] So you know what? It's a fair discovery
[16] question, and if I notice up their depositions, you
[17] can object at that time, but there is no basis,
[18] there is no privilege for this witness not to
[19] answer the question.

[20] **MR. McMAHON:** I'll have to think about
[21] that.

[22] **MR. LANDES:** What's the privilege?

1—15:56:24 22—15:57:22

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[1] **MR. McMAHON:** This is a deposition of
[2] this individual. It's not a deposition of CAIR. I
[3] mentioned that earlier. You could have noticed
[4] this deposition consistent with 30[B]6, I think it
[5] is, to have a corporate spokesperson be here to
[6] address these questions. He's told you that
[7] various people at CAIR worked on various issues
[8] regarding Exhibit No. 11, I think.

[9] **THE WITNESS:** Yes.

[10] **MR. McMAHON:** Eleven. And I don't see
[11] of what relevance it is that he should identify all
[12] the people at CAIR that worked on this rebuttal
[13] testimony.

[14] **MR. LANDES:** Just give me the name of
[15] everybody who talked to Mr. Omar Ahmad in
[16] connection with preparing this document.

[17] **MR. BOYD:** I'm going to interpose an
[18] objection here now. The question I think that was
[19] on the table earlier, because I think it
[20] misrepresented this statement, I think you
[21] suggested that the author of this document
[22] expressed some actual knowledge of what the

1—15:57:25 22—15:58:24

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[1] statement was when the author of this document at
[2] page 8 appears to be simply commenting on what
[3] appears in the transcript you just showed us.

[4] **MR. LANDES:** No. This isn't
[5] complicated. The witness produced a document, a
[6] document of public record. It goes to the
[7] statement that an important witness in this case—

[8] **MR. McMAHON:** It's a CAIR document, not
[9] Nihad Awad document.

[10] **MR. LANDES:** "Supplemental Testimony of
[11] Nihad Awad." Okay? That's about as Mr. Awad
[12] document as you're going to find.

[13] **THE WITNESS:** That's in connection to
[14] the previous one, supplement to the first one, and
[15] the first one says Council on American Islamic
[16] Relations, CAIR.

[17] **MR. LANDES:** The witness testified what
[18] the witness testified. It's his testimony.

[19] There's obviously some effort—

[20] **THE WITNESS:** I think, if I may
[21] something here, it must have been very logical for
[22] anyone who responded to this by Mr. Epstein that

1—15:58:34 22—15:59:50

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[1] read Mr. Epstein's allegations in the testimony
[2] that he presented to the Congress and examined the
[3] context of that text itself, and so that Mr.
[4] Ahmad's position most likely would be the one
[5] that's written here. When we prepare testimonies,
[6] we consult definitely with people, staffers and so
[7] on, and we did not have a video camera to see
[8] exactly who talked to whom and what.

[9] **MR. LANDES:** I think, with all due
[10] respect, it's a fair question, and I'm not asking
[11] for the whole document, to ask who worked on the
[12] testimony with respect to Item No. 7, and it's a
[13] fair question to ask in a discovery deposition. If
[14] I then go out and try to notice up that person for
[15] a deposition, you know, you're free to file a
[16] motion to quash and we can have it out there. We
[17] came all the way here. We've asked these
[18] questions. It goes to an issue that we think is
[19] important.

[20] **MR. McMAHON:** Let's go outside for a
[21] second.

[22] **MR. LANDES:** Wait a minute. I want to

1—15:59:52 22—16:05:48

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[1] know what's the pending privilege.

[2] **THE WITNESS:** Can we—

[3] **MR. LANDES:** I don't know why—I don't
[4] think it's appropriate to step out now.

[5] **MR. McMAHON:** You made an extensive
[6] statement on the record. The report can read it
[7] back if you want.

[8] **THE WITNESS:** Can I consult with my
[9] legal counsel?

[10] **MR. LANDES:** Fine.

[11] **THE WITNESS:** Thank you.

[12] **VIDEOGRAPHER:** We're now going off the
[13] video record at 3:59 p.m.

[14] [Recess while witness confers with
[15] counsel.]

[16] **MR. LANDES:** The witness was out of the
[17] room with his counsel for at least minutes.

[18] **VIDEOGRAPHER:** We're back on the video
[19] record at 4:05 p.m.

[20] **MR. BOYD:** That was an exaggeration.

[21] **MR. LANDES:** All right. Five minutes.

[22] **MR. McMAHON:** Fifteen minutes?

1—16:05:48 22—16:06:50

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[1] **MR. LANDES:** Five minutes.

[2] **MR. McMAHON:** Five minutes, I'll agree.

[3] **MR. LANDES:** I'm not going to quibble.
[4] The record is the record.

[5] **MR. LANDES:** We asked the witness to
[6] identify the people at his organization who worked
[7] on preparing the response to Paragraph No. 7.

[8] **MR. McMAHON:** And your answer is what?

[9] **THE WITNESS:** Arsalan Iftikar is one of
[10] the staffers who helped draft this document.

[11] **BY MR. LANDES:**

[12] **Q:** Did you say Arsalan?

[13] **A:** Yes. Let me just write it down.

[14] **MR. McMAHON:** A-R-S-A-L-A-N, Iftikhar,
[15] I-F-T-I-K-A-R.

[16] **THE WITNESS:** Arsalan.

[17] **MR. McMAHON:** I did Arsalan. Iftikhar

[18] is I-F—

[19] **THE WITNESS:** T-I-K-H-A-R.

[20] **MR. McMAHON:** K-H-A-R.

[21] **BY MR. LANDES:**

[22] **Q:** Now, I understand from speaking to Mr.

1—16:06:54 22—16:07:54

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[1] Iftikhar when we sent up the deposition that he is
 [2] a lawyer at CAIR; is that true?
 [3] A: He's a director of legal affairs.
 [4] Q: I just don't want to wind up in a
 [5] privilege issue with him, but he was not acting as
 [6] a lawyer when he did this; he was acting as a staff
 [7] person?
 [8] MR. McMAHON: Well, you're potentially
 [9] getting into that because he's the director of
 [10] legal affairs, and Mr. Awad's statement—and that's
 [11] why I wanted to talk to him about that, because of
 [12] potential CAIR in-house counsel privilege, and Mr.
 [13] Awad does not know whether or not Arsalan Iftikhar
 [14] actually spoke with Omar Ahmad. That's the answer,
 [15] and I would suggest if you're going to explore this
 [16] further, that, you know, you serve a subpoena on,
 [17] you know, a corporate spokesman for CAIR.

BY MR. LANDES:

[18] Q: Can you identify any other people who
[19] worked on this?

[20] MR. McMAHON: The supplement?

[21] MR. LANDES: Right.

1—16:07:57 22—16:09:08

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[1] THE WITNESS: I have to ask him to see
 [2] if he sought help from other people.
 [3] MR. LANDES: All right. Would counsel
 [4] agree that we just could get this some other way,
 [5] you could send us a letter giving us the names so
 [6] we don't have to—

[7] MR. McMAHON: You don't want to come
[8] back to Washington?

[9] MR. LANDES: I come here all the time.
[10] Don't worry.

[11] MR. McMAHON: I think we can take that
[12] up. The sole request is the identify of any
[13] persons who at CAIR worked on the supplement?

[14] MR. LANDES: That's fine.

[15] MR. LANDES: Let's go back to one more
[16] question on the Barry University thing. I looked
[17] at that at lunchtime, and I just want to ask you
[18] one more question. I think it was No. 3.

[19] MR. McMAHON: The one that marked 3 on.
[20] It's it.

BY MR. LANDES:

[21] Q: The second line from the bottom, maybe
[22]

1—16:09:12 22—16:10:07

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[1] you've answered this, but I don't think so. You
 [2] said: "I spoke to leaders of the Hamas, and I
 [3] interviewed them as a journalist." Do you recall
 [4] sitting here today who you spoke, who you were
 [5] referring to in that statement?

[6] A: No, I don't remember exactly whom I
[7] spoke to, but it was my overall impression and
[8] assessment.

[9] Q: You testified that you had taken one
[10] trip to Ramallah, in environs of Ramallah
[11] basically, a suburb of Jerusalem, Ramallah and
[12] Jerusalem. You don't recall whether it was on that
[13] trip that you had these considerations?

[14] A: No.

[15] Q: Do you recall whether it was
[16] interviewing people who came to North America from
[17] Palestine?

[18] A: Probably in conferences or visits in
[19] some cities.

[20] Q: How did you know that they were from
[21] Hamas?

[22] A: They might have identified themselves or

1—16:10:10 22—16:12:16

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[1] associated with the movement.

[2] Q: All right. We're going to show a tape
[3] just to ask you two things, whether you were at a
[4] particular IAP convention and then also to help us
[5] identify some people who appear on the tape. We're
[6] not sure who they are. But you obviously testified
[7] you know a lot of people. Maybe you can help us
[8] with that?

[9] A: A lot of people? That's not accurate.

[10] Q: Well, I think it's a fair comment that
[11] you know many people that are active in causes,
[12] speakers and so on, and if you know who they are,
[13] you know who they are. If you don't, you don't.

[14] We won't take long with this. Don't
[15] worry.

[16] [Video presentation.]

[17] MR. BOYD: There is copyright 1990?

[18] MR. LANDES: Something like that.

BY MR. LANDES:

[19] Q: This is obviously something for the
[20] Islamic Association for Palenstine. That's their
[21] emblem; is that correct?
[22]

1—16:12:17 22—16:12:53

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[1] A: Yes.

[2] Q: So this would appear to be a tape that
[3] they produced; is that a fair comment?

[4] A: Apparently.

[5] MR. McMAHON: Let me know that this is a
[6] copyright from 1990.

[7] MR. LANDES: He knows. I didn't say
[8] that.

[9] MR. McMAHON: Well, I picked on that and
[10] wrote that down. So we're taking some footage here
[11] that allegedly was made in 1990 and has the IAP
[12] stamp on it.

[13] BY MR. LANDES:

[14] Q: All right. Does that appear to be the
[15] IAP stamp?

[16] MR. BOYD: Steve, so we're clear and I
[17] don't have to object, we reserve all objections of
[18] this type until trial.

[19] MR. LANDES: I understand. We're
[20] just trying to take a little discovery here.

[21] MR. McMAHON: And we do too.

[22] BY MR. LANDES:

1—16:12:53 22—16:13:47

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[1] Q: Okay. Move on to the people. All
[2] right. What does that say?

[3] MR. McMAHON: Well, stop that tape. Are
[4] you having him here as a translator?

[5] MR. LANDES: You know what? I'm not
[6] going to quibble with you. Just move forward. You
[7] know, I can get it translated somewhere else.

[8] MR. McMAHON: Well, why don't you have a
[9] translator here then?

[10] MR. LANDES: Don't worry about it.

[11] MR. McMAHON: I'm not going to.

[12] BY MR. LANDES:

[13] Q: Let's get to the names. Let's see the
[14] people. Do you know who that is?

[15] A: This is a famous scholar.

[16] Q: What is his name?

[17] A: Youssef Caridou.

[18] Q: All right. Now, did you—have you heard
[19] Youssef Caridou speak before?

[20] A: On Al Jazeera.

[21] Q: Sorry?

[22] A: On Al Jazeera.

1—16:13:47 22—16:14:26

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[1] Q: Have you ever seen him speak in person?

[2] A: No.

[3] Q: So that means having seen that tape, you
[4] had not attended any IAP convention in which he
[5] spoke?

[6] A: I don't remember.

[7] Q: Well, he is a pretty important person,
[8] isn't he?

[9] A: Yes.

[10] Q: Okay. So—

[11] A: He became important after Al Jazeera
[12] took off, which is maybe in '95.

[13] Q: Okay. But so you can't tell me whether
[14] you ever heard him speak in person at an IAP
[15] convention?

[16] A: I don't remember.

[17] Q: Okay. So by seeing this, you don't
[18] remember attending an IAP convention that he spoke
[19] at?

[20] A: I don't remember.

[21] Q: Okay. Who is this person, do you know?

[22] A: I don't know.

1—16:14:27 22—16:15:30

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[1] Q: Go to the next one. Do you know who
[2] that is?

[3] A: No.

[4] Q: All right. Do you know that is?

[5] A: No.

[6] Q: Do you know that is?

[7] A: No. Can I ask a question?

[8] Q: Sure.

[9] A: What year is this?

[10] Q: 1989. Well, you came there in 1993. So
[11] maybe you know who some of these people are. They
[12] come to more than one convention. They're
[13] well-known people. We're having the same problem,
[14] so we're asking you.

[15] A: Okay.

[16] Q: Do you know who that is?

[17] A: No.

[18] Q: All right. Did you hear a name like
[19] Muhammad Siam, I think you said?

[20] A: No.

[21] Q: Does it say—what does it say? Does it
[22] have the names there?

1—16:15:32 22—16:16:07

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[1] MR. McMAHON: I'm going to object to him
[2] slating anything on this tape for you. If you
[3] want to ask him a question, have somebody certify
[4] that on this particular tape that says something in
[5] English, fine.

[6] MR. LANDES: All right. Fine.

[7] BY MR. LANDES:

[8] Q: Go ahead. Do you know who this person
[9] is? You said no?

[10] A: No.

[11] Q: Do you know who this person is?

[12] A: No.

[13] Q: The next one, this one?

[14] A: Yes.

[15] Q: Who is that?

[16] A: Rashid Galassi.

[17] Q: I'm sorry?

[18] A: Rashid Galassi.

[19] Q: Who is he?

[20] A: He's a known Tunisian leader.

[21] Q: Tunisian?

[22] A: Yes.

1—16:16:08 22—16:17:09

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[1] Q: Did you ever hear him speak at an IAP
[2] convention?

[3] A: No.

[4] Q: Go ahead. Do you know who that is?

[5] A: No.

[6] Q: This person?

[7] A: No.

[8] Q: Do you know who that is?

[9] A: No. I'm sorry. I'm sorry. Go back.

[10] Yes.

[11] Q: I'm sorry?

[12] A: Yes, I know.

[13] Q: Who is it?

[14] A: Dr. Hatem Husseini.

[15] Q: I'm sorry?

[16] A: Hatem Husseini.

[17] Q: Hatem Husseini?

[18] A: Yes.

[19] Q: Let me try that. H-O-S?

[20] A: Like Hussein, but maybe "I" at the end.

[21] Q: Hussein, H-U?

[22] A: Um-hum.

1—16:17:11 22—16:18:08

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[1] Q: H-U-S-S-E-I-N-I.

[2] A: Do you want more information on him?

[3] Q: Sure. Do you have any?

[4] A: He used to be, I think, a PLO

[5] representative or associated with the PLO, used to

[6] be a professor at the university, and I think came

[7] and spoke at a conference in Minneapolis.

[8] Q: You heard him speak there?

[9] A: I heard him on the radio.

[10] Q: Do you know which university?

[11] A: I don't know, but I remember hearing a

[12] good discussion on the radio.

[13] MR. McMAHON: Excuse me. What about

[14] your prayers?

[15] THE WITNESS: Yeah. Maybe five or seven

[16] minutes. I have to do my prayers.

[17] MR. LANDES: That's fine.

[18] BY MR. LANDES:

[19] Q: Was it a university here or in the

[20] Middle East?

[21] A: No. In Minneapolis.

[22] Q: In Minneapolis. I'm sorry. Okay. Does

1—16:18:11 22—16:19:08

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[1] he—that's where he taught or he came to speak?

[2] A: I think he came to speak.

[3] Q: Do you know where his normal position

[4] is?

[5] A: He's dead.

[6] Q: Oh, he's dead. Okay. Well, before he

[7] died.

[8] A: No. No. I know that he was an

[9] associate with the PLO.

[10] Q: Okay.

[11] A: I just knew him because of my presence

[12] with the General Union of Palestine Students.

[13] Q: Okay. Do you know who that is?

[14] A: No.

[15] Q: You would know who that is.

[16] MR. McMAHON: We'll stipulate.

[17] MR. LANDES: All right. Hear him talk,

[18] and maybe you can see if you recognize his voice.

[19] [Pause.]

[20] MR. LANDES: Oh, I guess he's going to

[21] speak later. So we'll get him later.

[22] BY MR. LANDES:

1—16:19:10 22—16:21:02

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[1] Q: All right. Let me ask you this: Was it
[2] common to have people come dressed like that?
[3] A: I never seen that before.
[4] Q: Never saw that before. Go ahead. Okay.
[5] MR. BOYD: How close are we, Steve?
[6] MR. LANDES: Pretty close.
[7] BY MR. LANDES:
[8] Q: Do you know who that person is?
[9] A: Yes.
[10] Q: Who is that?
[11] A: I believe Yasser.
[12] Q: I'm sorry?
[13] A: Yasser Bushnaq.
[14] Q: Is that Yasser Bushnaq?
[15] A: I believe so.
[16] Q: Okay.
[17] A: It was a long time ago.
[18] Q: Okay. Thank you.
[19] MR. LANDES: Do you want to—are you
[20] almost done with your tape?
[21] VIDEOGRAPHER: Thirty seconds left.
[22] MR. LANDES: Why don't we do this? Mr.

1—16:21:04 22—16:36:37

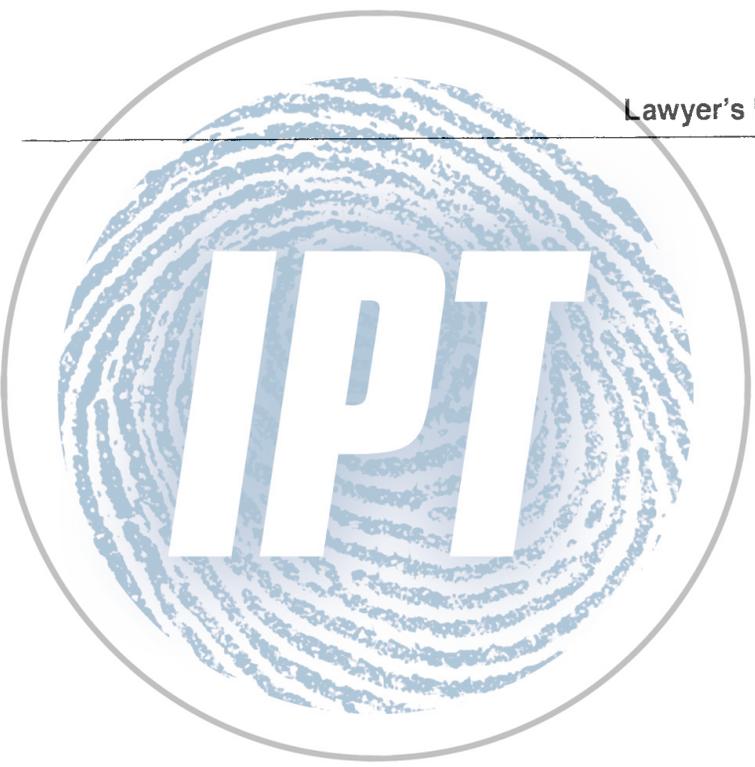
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[1] Awad, how long will it take you to do your prayers?
[2] THE WITNESS: Five, ten minutes.
[3] MR. LANDES: Do you want to do that?
[4] Because I don't know that I can finish in ten
[5] minutes. If you want to do that now, because I
[6] don't want you to be late.
[7] THE WITNESS: Okay.
[8] MR. LANDES: And then we'll find the
[9] next spot on the tape, and then I think we're just
[10] about ready to go.
[11] THE WITNESS: Okay.
[12] VIDEOGRAPHER: We're now going off the
[13] video record at 4:20 p.m., and this is the end of
[14] Tape 2.
[15] [Recess.]
[16] VIDEOGRAPHER: We're now back on the
[17] video record. The time is 4:35 p.m., and this is
[18] the start of Tape 3.
[19] MR. LANDES: Mr. Awad, I have no further
[20] questions. I thank you for coming today.
[21] MR. BOYD: I have only a couple of
[22] questions.

1—16:36:37 15—16:36:56

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[1] EXAMINATION BY COUNSEL FOR THE DEFENDANTS
[2] BY MR. BOYD:
[3] Q: Are you a member of Hamas?
[4] A: No, I am not.
[5] Q: Were you a member of Hamas in 1993?
[6] A: Never.
[7] Q: Never?
[8] A: Never.
[9] MR. BOYD: Okay. Thank you. No further
[10] questions.
[11] MR. LANDES: Thank you.
[12] MR. McMAHON: No questions.
[13] VIDEOGRAPHER: We're now going off the
[14] video record at 4:36 p.m., and this is the end of
[15] Tape 3.
[16] [Whereupon, at 4:36 p.m., the deposition
[17] concluded.]
[18] [Signature not waived.]
[19]
[20]
[21]
[22]



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