



# Exhibit B



AFFIDAVIT OF DR. SAMI AMIN AL-ARIAN

I, Dr. Sami Amin Al-Arian, declare under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

1. I have been called three times to appear before the Grand Jury of the U.S. District Court for the Eastern District of Virginia investigating individuals involved with the International Institute for Islamic Thought ("IIIT").

2. After I was acquitted in Florida of eight counts, I agreed to a plea agreement to end all business with the United States government. As I told the Magistrate Judge during the plea colloquy, it was in my best interest to plead guilty to one count of providing services to PIJ, specifically immigration related services. During the negotiations over the plea agreement, I insisted on removing provisions on cooperation with the government - including any testimony before any grand jury, - any demands for restitution, and any reference to any material support of terrorism. The government agreed to remove such provisions.

3. My refusal to sign the agreement with the cooperation provisions was based on my unwillingness to assist the government in doing to others what it had done to me and my family.

4. I signed the plea agreement under the express assurance that the government could not demand my cooperation in any criminal investigation and I would not have to deal any further with the Florida case or the underlying investigation. Indeed, I agreed to add time of incarceration in exchange for not having to cooperate with the government in future investigations.

5. I continue to believe that the plea agreement relieved me of the obligation to testify before this grand jury and I continue to pursue appeals to establish that right.



6. Without waiving any of my rights or appeals, I have agreed to make this statement to demonstrate to the government that I am not withholding any information related to IIIT or any other criminal behavior related to IIIT.

7. After my incarceration for civil contempt, I made a good-faith offer to demonstrate to the government that I have no information related to any criminal acts related to IIIT. Moreover, my counsel supplied an attorney proffer that explained the meaning of all of the documents raised by the government as the basis for my testimony.

8. I offered to answer questions about IIIT to show that I know of no crimes committed by that organization or its officers. I further offered to submit to a polygraph examination to establish that I had testified truthfully on the information and documents related to IIIT.

9. The government, however, insisted on asking questions about matters related to the Florida case and underlying allegations. This was precisely what I was told would be covered under the plea agreement.

10. I have agreed to supply this affidavit to show that I am not holding back information on any crime related to IIIT and to offer my full knowledge of the meaning of these documents and underlying facts.

**I. My Interaction with IIIT**

11. I offered to take a polygraph examination to establish the truth of this information.

12. To the best of my recollection and knowledge, my first contact with the International Institute for Islamic Thought ("IIIT") occurred in the fall of 1983 or early 1984. The president of IIIT at the time was the late Palestinian-American professor of religion at Temple University in Philadelphia, Dr. Ismail Al-Faruqi.




13. Dr. Al-Faruqi is from the same Palestinian family as my mother. He also was a contemporary of my father in their hometown city of Jaffa before the exile of 1948.

14. I have known Dr. Al-Faruqi since 1976 when I met him at different Islamic conferences and even shared the podium with him at a University of Michigan conference in the early 1980s.

15. During my discussions with Dr. Al-Faruqi, I was very impressed with the mission and concept of IIIT. I felt that it represented a new paradigm regarding the theory of knowledge, understanding, and analysis of Islamic history, theology, and the many different disciplines of social science and humanities.

16. After Dr. al-Faruqi passed away in 1986, Dr. Taha Jabir Al-Alwani became the second president of IIIT. I had met Dr. Al-Alwani many times before, in the mid-1980s, at the IIIT headquarters during my visits to Washington D.C. I was very impressed with the depth and breadth of Dr. Al-Alwani's knowledge regarding Islamic theology, jurisprudence and history. I felt that Dr. Al-Alwani represented a new kind of modern Islamic scholar and cleric who was willing, and not afraid, to explore a new interpretation of issues and rulings in contrast to many orthodox, conservative, or traditional clerics in the Middle East. This appealed to me greatly and I became good friends with Dr. Al-Awani because we shared many ideas, outlooks, and vision regarding these issues including a genuine critique of the orthodox and conservative interpretations of Islam as outlined by many Islamic clerics and movements.

17. Between 1988 and 1992, the Islamic Committee for Palestine ("ICP"), an organization that I had co-founded, held annual conferences. To the best of my recollection, Dr. Al-Alwani was a guest speaker at all five of the ICP annual conferences. The major themes of these conferences were two-fold: (1) The current (first) intifada in the occupied territories, and (2) the need for internal reform within the Islamic World and Islamic movements. Dr. Al-Alwani always addressed the second theme,




which I think was because Dr. Al-Alwani had limited involvement and knowledge of the Palestinian cause. None of the other individuals at IIIT attended any of the ICP annual conferences, although they might have received invitations.

18. I also co-founded the World and Islam Studies Enterprise (“WISE”), a Tampa-based research center. WISE’s mission and research interests are listed in its brochure and articles of incorporation which the FBI seized during its November 1995 search. WISE was in operation from the fall of 1990 until late 1995.

19. WISE and IIIT shared many ideas and interpretations regarding the major challenges and issues facing the Muslim World. In essence, they complemented each other. While IIIT focused on the abstract and theory, WISE focused on current events. Specifically, IIIT looked at issues facing the Muslim World on historical, theological, and epistemological levels. WISE focused on the relationship between the Islamic World and the West in the last two centuries from a political and analytical perspective. Each organization appreciated the other and considered its work important and vital in the continuous process of reform, understanding, and re-interpretation.

20. Although WISE was a much smaller organization (its entire budget over five years was in total less than \$600,000), its contributions and achievements have been recognized by the premiere American academics, specialists, and intellectuals in the field of Islamic history, Islamic studies, and the social sciences. WISE produced a quarterly quality journal (20 issues in five years). Each journal concentrated on a main theme as well as two or three other smaller themes. Translation of all the indices of all the issues of WISE’s journal can be found in the record of the 2005 Florida trial as well as within the seized material in the FBI office in Tampa. Only two issues concentrated on the Palestinian issue. I believe that Dr. Al-Alwani contributed to WISE’s journal several times. WISE also held two round-table discussions in 1992 and 1993. These involved a full-day discussion between



an Islamic scholar and leader with at least 20 American academics in the field. Publications of these proceedings were sold to the public.

## II. My Relationship with Dr. Al-Alwani

21. WISE had a board of advisors that included over 20 scholars. Dr. Al-Alwani was a member of that board and possibly even its chairman. I am not certain if that board ever held a formal meeting due to WISE's shortage of funds. I believe that some of the board members provided guidance and advice to WISE's publications and activities during its time of operation.

22. After the December 1990 ICP annual conference in Chicago, WISE and IIIT co-sponsored a one-day symposium in the same hotel that featured about three dozen guest speakers, including many of the ICP conference speakers. To the best of my recollection, the theme of this symposium was the challenges facing the Islamic World in the new world order after the collapse of the Soviet Union and on the eve of the Gulf War. The symposium was video-taped in its entirety. The videotapes were seized in the November 1995 FBI search. IIIT paid for the expenses of this symposium while WISE took care of the logistics and organization. I believe that Check #2911 for \$5,000, which was paid on January 30, 1991, and was referenced in Dr. Al-Alwani's September 30, 1992 letter constituted IIIT's payment for the above referenced symposium.

23. Sometime during May 1991, I approached Dr. Al-Alwani at IIIT's headquarters in Herndon, VA, and appealed to him to help WISE because it was struggling financially. Dr. Al-Alwani, after much discussion, pledged that IIIT would contribute \$50,000 to WISE during the following year. I recall that Dr. Al-Alwani asked how WISE would use these funds. I assured Dr. Al-Alwani that WISE would use the contribution to fund the publication of its journal as well as for the operational expenses of the center.






24. During a subsequent visit in November 1991, I again asked Dr. Al-Alwani to help cover part of the cost of the ICP conference in Chicago in December 1991. Dr. Al-Alwani was hesitant to provide ICP financial support because ICP was an advocacy organization and IIIT only supported academic and research institutions. I was able to convince Dr. Al-Alwani that one of the ICP's conferences' themes coincided with the IIIT mission – mainly the issue of reform and the Islamization of knowledge. Moreover, I was able to convince Dr Al-Alwani that the best way for IIIT to be effective was to reach out to the Muslim masses during these conferences to explain itself and its new approach to the challenges facing the Muslim World. Dr. Al-Alwani eventually agreed to contribute \$10,000 to ICP to cover part of the cost of the annual conference.

25. The following background relates to the September 30, 1992, October 26, 1992, and November 6, 1992 letters between myself and Dr. Al-Alwani. Earlier, I had asked Dr. Al-Alwani to fulfill his earlier commitment to WISE for \$50,000. Dr. Al-Alwani responded on September 30, 1992 stating that IIIT's pledge had been fulfilled. I responded on October 26, 1992 that there were basically two problems: (1) the check in January 1991 (for the December 1990 symposium) was prior to the May 1991 agreement and should not have counted towards the \$50,000 pledge to WISE and (2) the pledge to subsidize the ICP conference was totally separate and should not have counted towards the pledge to WISE. This was made plain by me in my October 26, 1992 response that WISE and ICP were totally separate entities and were not substitutes for each other.

26. I believe that Dr. Al-Alwani's letter dated November 6, 1992 was a disguised attempt by IIIT to get out of its commitment to ICP by saying that IIIT dealt with the individuals involved with WISE and/or ICP and those institutions themselves as "a group," and that WISE and ICP were basically "their" institutions where it did not matter to him whether the \$50,000 pledge was spent on WISE, ICP, or both, but that it was up to the individuals involved with WISE and/or ICP. I believe




that the letter was a pure turn-around by Dr. Al-Alwani in order to not pay the \$10,000 and I believe the letter invoked flowery and brotherly language to extricate Dr. Al-Alwani from the pledge so as to avoid the payment. I believe that when Dr. Al-Alwani had made the pledge to ICP for \$10,000, he might not have had prior approval from his Board, and when he did not get that approval later, he tried to back away by writing this letter and saying: "when we make a commitment to you or try to offer, we do it for you as a group (i.e. the people who ran WISE and ICP), regardless of the entity (not party as in the translation) or the affiliation (not façade as in the translation) you use the donations for." I believe that Dr. Al-Alwani meant that whether the individuals involved with WISE and/or ICP used the money for WISE or ICP, Dr. Al-Alwani did not care because some of the same individuals ran both organizations. Again, I believe it was Dr. Al-Alwani's explicit way to extricate himself from his second commitment to ICP (which I considered totally separate from WISE.). This could easily be seen in Dr. Al-Alwani's following statement: "As for the names (appellations in translation) whether they were in the name of the center (i.e. WISE) or the committee (i.e. ICP) they do not change anything of the fact of the matter (i.e. that some of the same individuals ran both organizations.)" I disagreed with Dr. Al-Alwani's interpretation and analysis and I believed that I was in hot water with the other members of WISE because they did not know about Dr. Al-Alwani's commitment to me regarding ICP, which made WISE short \$10,000 because of the back-tracking on Dr. Al-Alwani's commitment.

### **III. Dr. Nafi's Connection with IIIT**

27. Sometime in the Spring of 1994, Dr. Al-Alwani approached Dr. Bashir Nafi for a position at IIIT. Dr. Nafi was one of the editors of WISE's journal and its Director of Research. He was, at the time, residing in London. Dr. Nafi had earlier stayed in Tampa for several months and WISE had already initiated the process for his visa and residency to work for WISE in Tampa. Dr.





Nafi had already retained a local Tampa immigration lawyer and the process had been proceeding for several months when Dr. Al-Alwani contacted Dr. Nafi in London.

28. WISE was experiencing financial difficulties at the time, and Dr. Nafi accepted the IIIT offer until more funds were available at WISE. I was not happy about this arrangement. Dr. Nafi explained his reasoning for taking the position with IIIT to me and I understood it to be as follows:

- a. Dr. Nafi would still work at WISE in his capacity as Director of Research and its chief editor of the journal while also working for IIIT. It did not matter whether he worked out of London or the D.C. area for WISE. In fact, Washington D.C. was closer to Tampa.
- b. Dr. Nafi would be employed by IIIT as a managing editor of its English journal and chief assistant to Dr. Al-Alwani in addition to his duties for WISE.
- c. Dr. Nafi's salary would be paid by WISE while IIIT would contribute to WISE an annual amount that would exceed his salary. Dr. Nafi's rationale for this arrangement was three-fold:
  - i. Dr. Nafi did not want to submit immigration and visa papers to work for another institution and to pay legal fees for such papers because he had already paid over \$3,000 in legal fees. Dr. Nafi also did not want to restart the processing of his immigration papers by having to resubmit with a different sponsor.
  - ii. Dr. Nafi had already been working for WISE in London and the work for IIIT would be in addition to his duties for WISE. Dr. Nafi also wanted to be in the D.C. area because he was working on his second PhD dissertation in history and wanted to be near the Library of Congress and Georgetown University library.
  - iii. Dr. Nafi wanted to boost WISE's budget with the IIIT contributions. He had also promised that the moment WISE was able to raise enough funds through the



collective efforts of me and Dr. Nafi, and when Dr. Nafi was done with his research for his dissertation, Dr. Nafi would move back to Tampa. Hence, Dr. Nafi argued that his involvement with IIIT was temporary and in his view there was no need to go back and forth with the attorney about which organization would sponsor him. I recall that Dr. Nafi also said that he consulted with the attorney about whether he could work for WISE out of Washington D.C. and the attorney said that would be acceptable as long as he was paid by WISE.

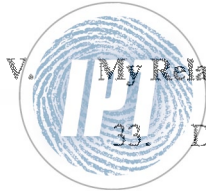
29. I was not a party to any discussions or understandings as to what Dr. Al-Alwani or other IIIT people might have known regarding Dr. Nafi's employment by, or involvement with, WISE.

30. After the November 1995 FBI raid on WISE and the freezing of its account, WISE effectively ceased operation and closed its offices. Dr. Nafi eventually transferred his visa to IIIT in early 1996.

#### **IV. My Knowledge of SAAR's Transactions**

31. I believe that the \$10,000 donation from the SAAR Foundation to WISE referenced in the October 7, 1994 letter by Dr. Muhammad A. Jaghlit was in connection with the cooperation between WISE and IIIT regarding personnel and programs. I believe that this \$10,000 donation was an added contribution that year on top of IIIT's payment to WISE as reimbursement for WISE's salary payments to Dr. Nafi that can be attributed to his service to IIIT.

32. A check for \$3,000 from SAAR Foundation to the Islamic Academy of Florida ("IAF"), a private community-based Islamic school which I founded in 1992, was sent either in 1993 or 1994. The funds were spent on the operation of the school. The FBI should have records relating to all of IAF's bank accounts and expenses.




V. My Relationship With Dr. Totonji

33. During 1994, I corresponded frequently with Dr. Ahmad Totonji, one of the individuals who was part of IIIT or its related organizations, in an effort to raise funds. Dr. Totonji was based in Saudi Arabia. I had seen him before at IIIT's headquarters and at various Islamic conferences. I was told (although I do not recall by whom) that Dr. Totonji had excellent contacts for fundraising in Saudi Arabia.

34. I engaged in fundraising in Saudi Arabia mainly to support the IAF school. I also mentioned two other projects to Dr. Totonji. One was to support an English language journal by WISE to be edited by me, and the other was to help find sponsors for the Orphan Sponsorship project in the occupied territories of Palestine. Dr. Totonji's response regarding the journal was to decline any seed money because as he said, people in Saudi Arabia did not appreciate intellectual work, especially in languages other than Arabic. I then asked Dr. Totonji if it was possible to find a sponsor for 1,000 subscriptions to the journal. Dr. Totonji's response was that it was probably too much but referred me to another person. Eventually, the idea for the journal died because I could not raise the seed money by the end of 1995 when WISE became defunct.

35. As for the Orphans project, Dr. Totonji referred me to a Saudi organization that specialized in helping and sponsoring orphans. I visited this organization in Saudi Arabia but the person in charge was outside the country at the time. Nothing came out of that attempt. It was clear to me that Dr. Totonji did not get involved personally in any fundraising activity. He simply referred people to others and it was up to me to make the contacts, the pitch, and the follow-up.

36. During my visit to Saudi Arabia in May 1994, Dr. Totonji never once accompanied me to any visit for fundraising on behalf of the school. I used some of the contacts Dr. Totonji gave me as well as some of my own contacts to raise funds for the school. The hundreds of faxes and intercepts



that I made as well as my itinerary (which was seized in the 2003 FBI search) confirm that all these contacts were on behalf of the IAF school.

37. From 1994 until 2002, I raised hundreds of thousands of dollars from sources overseas (mainly from Saudi Arabia and the UAE), and hundreds of thousands of dollars more from domestic sources for the IAF school. All the money raised on behalf of the IAF school was spent inside the United States for school operations as attested by the FBI financial analyst during his 2005 trial testimony. The records of all the donations and their disbursements were seized in the 2003 FBI search and are currently housed in the FBI Tampa office.


38. All the money that was in the WISE account from 1991 through 1995 was spent on WISE's operations in the United States, which was also attested to by the government's agent.

39. The government has a copy of all the bank accounts and checks involving WISE, IAF, and others. During the dozens of transactions shown in court, I do not recall a single transaction involving IIIT or related organizations shown to the jury during the FBI's financial analyst's testimony.

#### **VI. My Contact With Other Individuals Connected With IIIT**

40. Dr. Khalil Shikaki was the first Executive Director of WISE. I believe that he was a well respected scholar and academic, who continues to be respected by the American administration as well as the Israeli authorities. When Dr. Shikaki left WISE in 1992, I believe that he was supposed to have established a branch office for WISE in the West Bank. He spent about \$13,000 buying equipment, establishing the office and printing WISE's publications.

41. It became clear to me and to WISE management in late 1992 that the production level of Dr. Shikaki for WISE was not adequate as he was more occupied with other projects, most notably with IIIT. Shortly later, WISE ended its relationship with Dr. Shikaki.



42. I was aware that Dr. Shikaki was reprinting IIIT books and publications in the West Bank and Gaza region and holding academic symposia for IIIT, but I was not aware of the extent of that involvement.


43. I was shocked in 2004, during the discovery phase of my Florida trial, to see the amount of money that went from IIIT to Dr. Shikaki during that period in the 1990s. It was clear from my observations of the cancelled checks of Dr. Shikaki's bank account that the money was going towards reprinting books, publications, academic scholarships, support of universities, libraries, and a fair amount of compensation for Dr. Shikaki. I do not know what arrangements Dr. Shikaki had with IIIT.

44. The plan WISE had with Dr. Shikaki in 1992 for its research and publications was outlined in writing and is currently in the possession of the FBI office in Tampa as it was seized in the 1995 search.

45. Sometime in 1999 or 2000, I approached some of the individuals associated with IIIT (I cannot recall the exact individuals) among many others, and solicited contributions for the legal defense fund for my brother-in-law, Dr. Mazen Al-Najjar, who was held on secret evidence at the time in an immigration proceeding. I believe that I received a contribution of either \$5,000 or \$10,000 (I cannot recall the exact amount) from one of the charities in Herndon or perhaps some combined individual donations. I cannot recall these contributions exactly.

46. During the 1999-2000 presidential campaign and up until September 11, 2001, I was very much involved in lobbying activities before Congress and in lobbying the administration to ban the use of secret evidence in immigration proceedings, among other civil rights issues. I recall having contacted a couple of dozen Muslim leaders and intellectuals across the United States in the summer of 2001 to establish a permanent lobbying group and political training organization. Drs. Barzinji, al-Talib, Al-Alwani and possibly Totonji were among these people. They encouraged me to pursue the





project and promised to promote it as best they could when it got off the ground. The full plan for such organization was seized in the 2003 search and is currently in the FBI Tampa office.

47. I chaired a strategy and brain-storming session regarding this project in July 2001 in the northern Virginia area. I recall that it was attended by several of the above mentioned individuals. The minutes of this meeting and the attendance list were seized by the FBI during the 2003 search and is currently in the FBI office in Tampa.

48. After September 11, 2001, I chaired another meeting in the northern Virginia area (possibly in late 2001 or early 2002) which was attended by at least a dozen people including some people from IIIT. I believed that the objective of the meeting was to explore an effective strategy for the Muslim community in the United States to respond to the 9/11 tragedy. The minutes of this meeting, along with the attendance list, were seized by the FBI during the 2003 search and are currently being held in the FBI office in Tampa.

49. I had previously consulted in my professional capacity as a professor of Computer Engineering for the Graduate School of Islamic and Social Science (GSISS), a graduate-level school whose president at the time was Dr. Al-Alwani, in the spring of 2000. My task was to design a web-based or satellite-based system to establish off-site classes. I was paid \$10,000 from the school account for expenses. The study was delivered in the fall of 2000.

50. I also recall participating in at least four symposia held at IIIT headquarters during the 1990s. I was either a guest speaker, moderator, discussant, or participant. I was paid for my travel, lodging, and expenses.

51. Other than the above mentioned financial transactions, I do not recall any other financial transactions involving IIIT or organizations or individuals associated with IIIT.




52. My relationship with Dr. Abdulhamid Abu Sulaiman was very limited. I only recall three meetings with him, although I had seen him at other events. My first encounter with Dr. Sulaiman was in the mid-1980s and the topic of discussion was Dr. Sulaiman's political theory on international relations. The second meeting was in the late 1980s and the topic of discussion was Ibn Taymiyyah, the medieval Islamic reformer of the 14th century. The last meeting I recall was in the late 1990s and the topic of discussion was child psychology.

53. My involvement with Dr. Hisham al-Talib goes back to 1976. I have always enjoyed having intellectual discussions with him throughout the years. I do not, however, recall any dealing with Dr. al-Talib on any projects or transactions of a financial nature.

54. My involvement with Dr. Jamal Barzinji was similar to that with Dr. Hisham al-Talib. It dates back to 1976 when I had met Dr. Barzinji at different Islamic conferences, primarily the Muslim Students Association ("MSA"), and the Islamic Society of North America ("ISNA"). I always respected Dr. Barzinji, had many fruitful discussions with him, and sought his advice regarding some of my projects such as the lobbying and political training group. I felt that Dr. Barzinji was always encouraging.

55. I believe that IIIT's financial assistance to WISE and/or ICP was always handled through Dr. Al-Alwani. I do not recall discussing these issues with anyone else. Even when I was frustrated with Dr. Al-Alwani (as discussed above), whenever I approached Dr. Barzinji for assistance, Dr. Barzinji asked me to handle the financial issues through Dr. Al-Alwani and would refuse to discuss the issue further.

56. I also invited Dr. Al-Alwani to address the members of the Islamic Community of Tampa Mosque. Dr. Al-Alwani spoke about the challenges facing the internal reform process within



the Islamic nation and the role for American Muslims in facing these challenges. I believe that this occurred in 2000. Dr. Al-Alwani paid for his own plane ticket and expenses for this trip to Tampa.

57. During the entire period that I have known the main individuals involved with IIIT or its related organizations, many of them have been located overseas for extended periods of time (such as in Saudi Arabia, Malaysia and others). During these years, I lost contact with those individuals.

58. To the best of my recollection, all the financial transactions received from IIIT and/or other related organizations by any institution founded or co-founded by me (such as WISE, ICP, IAF, or Tampa Bay Coalition for Justice and Peace), were spent on the operations of those organizations inside the United States and for the purpose that such contributions were solicited for in the first place.


59. I have no knowledge regarding the internal structures or operations of IIIT, SAAR, other related organizations, or their finances. I know of no incriminating information regarding anyone related to these organizations. I know these individuals to be honorable, loyal, and conscientious citizens concerned about the well being of this country and all humanity at large.

60. Furthermore, during the entire period I have known these individuals, I have never discussed with nor solicited IIIT (or other IIIT related organizations or any individual involved with IIIT or IIIT related organizations) for any financial support, aid or contributions for or on behalf of any organizations based outside the U.S., including the Palestinian occupied territories.

## **VII. My Recollections of the Documents Provided by the Government Regarding IIIT**

### **A. Letter by Ramadan Abdullah to Dr. Mark Orr of USF dated 12/11/1991**

61. I was not aware of this correspondence until I saw a copy of it when the FBI gave me a copy of what they seized in 1995. I was aware of the negotiations taking place, first between Dr. Shikaki and the University of South Florida ("USF"), then followed by Dr. Abdullah and USF, but I was not privy to the details of those negotiations. These negotiations took place during a very busy time in my academic career, as I was preparing my tenure application for my department in November



1991. (I received my tenure in March 1992.) Even when the agreement between WISE and USF was signed and the subsequent lunch took place at WISE, I was not able to attend because of my schedule.

62. As a point of information, however, in May 1991 during my discussion with IIIT president Dr. Al-Alwani, he agreed to support WISE with \$50,000 during that fiscal year. I think that the letter was probably alluding to that pledge which was eventually fulfilled in the following months.

**B. Letter from Dr. Al-Alwani to Dr. Sami Al-Arian dated 9/30/92**

63. I believe that this letter relates to IIIT's pledge to support WISE with \$50,000 that year. Dr. Al-Alwani sent this letter with a check for \$15,000 to WISE and argued that with that amount, IIIT had fulfilled its pledge. Dr. Al-Alwani also included the \$5,000 that was paid to WISE to cover the Chicago symposium in December 1990, and promised to send another \$5,000. Dr. Al-Alwani also mentioned that IIIT looked at WISE as an extension of their school of thought. That is, both of the groups embraced a modern and progressive interpretation of Islam that was more attuned to the present than other traditions such as the orthodox or the conservative interpretations. After many discussions, conferences, symposia, and meetings, I came to believe that Dr. Al-Alwani and I were very close ideologically and intellectually when it came to their understanding of history, theology, jurisprudence, and the challenges of reforms and re-interpreting the texts. Dr. Al-Alwani also mentioned his support of Dr. Khalil Shikaki's thinking that he was still affiliated with WISE despite the fact that by that time, he was not. (Note: in the translation, Dr. Shikaki's center in the West Bank should have been translated as the Islamic Studies Center (not Enterprise). That center established by Dr. Shikaki in the West Bank had no relation to WISE.)

64. Also note that when Dr. Al-Alwani referred to institutions, I firmly believed that Dr. Al-Alwani was referring to institutions established in the United States or by Dr. Shikaki in the West Bank, but definitely not political entities or movements.



**C. Letter from Dr. Sami Al-Arian to Dr. Al-Alwani dated 10/26/92**

65. This was my response to Dr. Al-Alwani's September 30, 1992 letter. In this response, I pointed out that Dr. Al-Alwani's understanding of IIIT's commitment was incorrect. My calculation was that WISE had received by that time only \$30,000, which left a balance of \$20,000. The \$10,000 given to ICP was a different commitment and should not have been included as part of IIIT's pledge to WISE.

66. I also reminded Dr. Al-Alwani that WISE's mission was complementary to IIIT. I also told Dr. Al-Alwani that I had spoken to Dr. Totonji, whom I believe I had met in September 1992, and Dr. Totonji stated that the support to ICP should not have counted towards the WISE pledge and, according to the letter, Dr. Totonji had agreed with me (although I do not recall the conversation or the circumstances.)

67. I also explained that the ICP Conference was a platform to promote IIIT publications and its mission before hundreds of participants. I believe that this was basically my selling point to Dr. Al-Alwani.

**D. Letter from Dr. Al-Alwani to Dr. Sami Al-Arian dated 11/6/92**

68. Dr. Al-Alwani's November 6, 1992 letter responded to my letter of October 26, 1992. As discussed above, this letter represented Dr. Al-Alwani's attempt to extricate and distance himself from IIIT's \$10,000 contribution to ICP. My interpretation of Dr. Al-Alwani's letter is as follows:

- a. Dr. Al-Alwani considered the people at WISE, as a group, a part of, and an extension of, IIIT because both groups subscribed to the modern, progressive, and reform trend within the contemporary Islamic movement. Since the 1970s, this trend has manifested itself through an intellectual magazine called "The Modern Muslim," that was published in Cairo. I admired and participated in the heated discussion raised by this magazine. In fact, IIIT





bought the magazine in the late 1980s and became its chief sponsor, publisher and voice in the Middle East.

- b. Dr. Al-Alwani also mentioned Sheikh Abdel-Aziz because Dr. Al-Alwani had met Abdel-Aziz at the ICP conferences and the WISE-IIIT symposium after the 1990 conference. Dr. Alwani and Abdel-Aziz agreed on many issues regarding Islamic reform and re-interpretation of the texts, the primary focus of IIIT's mission. I do not interpret his words at all to refer to any particular political group or affiliation but they refer instead to the intellectual and ideological extension of what IIIT considers its school of thought.
- c. The rest of the letter reflected Dr. Al-Alwani's persistent attempt to extricate himself from his \$10,000 commitment regarding the ICP conference. It is my understanding that when Dr. Al-Alwani discussed "our institutions," he was referring to WISE and ICP in order to make the point that as far as Dr. Al-Alwani was concerned, IIIT helped these institutions collectively with \$50,000 and it was up to individuals involved with both institutions about where the \$50,000 would be spent. My argument had been that Dr. Al-Alwani's commitment was for \$50,000 to WISE and \$10,000 to ICP, and that these commitments were completely separate and distinct. That is why Dr. Al-Alwani later said that IIIT did not care where the money was spent (i.e. whether for ICP or for WISE). Interpreting this statement to refer to support of a political group is mistaken. Dr. Al-Alwani's next statement clarified his position when he said that whether the money was spent on the Center (i.e. WISE) or the committee (i.e. ICP) did not change the fact that they were both organizations that some of the same individuals founded or managed.
- d. I also recall, as mentioned in Dr. Al-Alwani's letter, that a check for \$3,000 was sent to help the IAF school. This was the result of another solicitation by me to help the then



newly established school. I recall that these funds came from either SAAR directly or from one of the other charities. A copy of the check is available in the IAF records which were seized in the 2003 search and are now with the FBI Tampa office.

**E. Letter from Ahmad Totonji (in Saudi Arabia) to Dr. Sami Al-Arian (in Tampa, FL) dated 2/22/1994**


69. After much solicitation by me to Dr. Totonji regarding the IAF school, Dr. Totonji promised to submit the application for support to a charitable committee of which he was a part. Dr. Totonji also declined to solicit any donations on behalf of the IAF from any other source. Other faxes and numerous FISA intercepts can confirm those facts and the fact that all solicitations were on behalf of the IAF school in Tampa.

**F. Letter from Dr. Sami Al-Arian to Dr. Totonji (in Saudi Arabia) (Translation date 3/24/94)**

70. I believe that "this Islamic project" as it referred to in the letter, was the IAF school, as this was in response to Dr. Totonji's letter above regarding the school. Please note that it appears that my counsel did not receive the Arabic text of this letter and that the translators claimed that there were several unintelligible words in the letter.

**G. Letter by Dr. Totonji (in Saudi Arabia) to Dr. Sami Al-Arian (in Tampa) dated 7/6/94**

71. This letter was in response to an earlier letter sent by me, as I had been in Saudi Arabia in May 1994 and sent Dr. Totonji a letter on June 23, 1994. Although I do not have access to the June 23, 1994 letter, I can infer from Dr. Totonji's response that it is likely that I raised in this letter the other issues that I had brought up with Dr. Totonji when I was in Saudi Arabia. These issues were the English language journal that WISE wanted to launch and the Orphans Sponsorship project about which I could not meet with the official in Saudi Arabia. Again, Dr. Totonji referred both matters to different people and declined to do anything for me. The journal never got off the ground because the seed money was never raised. The Orphans project was never supported because the individual to



whom Dr. Totonji had referred me to never responded. I cannot recall exactly why the individual did not get in contact with me.

**H. Letter from Dr. Totonji (in Saudi Arabia) to Dr. Sami Al-Arian (in Tampa) dated 7/18/94**

72. This letter was in response to an earlier request by me (on July 15, 1994) to arrange for a loan to construct a building for the IAF school. As usual, Dr. Totonji declined to provide direct support and referred me to others. The FISA intercepts during that period would confirm that this was a major undertaking by me. Eventually, I bought a building next to the mosque for the school in November 1994.

**I. A letter from M. Jaghlit to Dr. Sami Al-Arian dated 10/7/94**

73. As previously discussed, Dr. Nafi joined IIIT in addition to his WISE duties, and IIIT in exchange paid WISE to cover Dr. Nafi's salary. I also recall that SAAR donated \$10,000 as a sign of continued cooperation in personnel and programs. I believe that this letter reflected this donation.

74. I believe that Dr. Jaghlit did not want this publicized because SAAR did not want other organizations or individuals to solicit them. I believe that if one were to check SAAR's records, one might find that this was their standard policy to all their recipients including non-Muslim institutions. I believe that this was not unique to WISE.

**J. A fax from Dr. Sami Al-Arian to Nader Jawad dated 10/25/94 (J1) & Dr. Al-Alwani's recommendation letter (J2)**

75. During my visit to Saudi Arabia in May 1994, I filled out an application to the "Iqraa Foundation" on behalf of IAF. It came to my attention that Dr. Barzinji knew the president of that foundation – Dr. Mohammad Abdu Yamani – very well. I asked Dr. Barzinji, as shown in the fax, to write a recommendation letter on behalf of the school. I sent a copy of Dr. Al-Alwani's recommendation as a template. IAF eventually received \$15,000 from this foundation. The check and the IAF records are with the FBI Tampa office.



Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true

and correct.

Executed this <sup>7<sup>th</sup></sup> 12 day of June 2008.

Dr. Sami Amin Al-Arian