

Muslim and non-Muslim world. He was an invited guest of both the Bush and Clinton White Houses.

39. In 1996, when Hilary Clinton decided to host the first ever White House reception to celebrate the end of Ramadan (called the Iftar), Mrs. Clinton asked Mr. Alamoudi to prepare the guest list.

40. Mr. Alamoudi's 2004 criminal conviction had nothing to do with Islam or terrorism. He was convicted of doing business with Libya in violation of an economic embargo.

Sheikh Yussef Al-Qaradawi

41. The Defendants' statements that Sheikh Yussef Al-Qaradawi is a radical supporter of Islamic terrorism and that any association by the ISB or its leaders with him makes the ISB radical and a supporter of terrorism is misleading and fails to deal accurately with who Sheikh Yussef Al-Qaradawi is and how he is regarded in the Muslim world and the West. These statements were made as "proof" of the broader attack by these Defendants that the ISB and its leaders have ties to radical Islam and terrorism.

42. Sheikh Yussef Al-Qaradawi is a prominent and influential religious leader in the Muslim world. He lives in Qatar and appears weekly on television in the Middle East on his program Al-Shariaa wa Al-Haya (Islamic Law and Life). His website describes him as the most prominent voice of moderation in Islam (wasatiyya), building bridges between traditionalists and modernizers.

43. In January, 2004, Sheikh Qaradawi was one of the primary speakers at the US-Islamic World Forum in Qatar, along with Bill Clinton and the United States' former ambassador to the United Nations, Richard Holbrooke.

44. In July, 2004, Ken Livingstone, the Mayor of London, referred to Sheikh Qaradawi as a well-respected moderate “who preaches moderation and tolerance to all faiths throughout the world.” A true and accurate copy of the July 12, 2004 BBC News article where the Mayor was quoted is attached hereto as Exhibit C. The umbrella organization over which most of the Muslim organizations in Britain are affiliated, The Muslim Counsel of Britain, has described Sheikh Qaradawi as “the most authoritative Islamic scholar in the world today.”

45. Following Sheikh Qaradawi’s visit to London in 2004, Mayor Livingstone published a twenty-three (23) page dossier responding directly to the incomplete and/or inaccurate statements made about Sheikh Qaradawi in connection with his visit. I note that the Defendants recycle here many of the same incorrect and misleading contentions made by Sheikh Qaradawi’s critics in London. A true and accurate copy of the Dossier is attached hereto as Exhibit D. The Dossier addresses directly, with documentary proof, the suggestion that Sheikh Qaradawi is anti-Semitic, anti-woman and anti-democratic, among other things. I am quoted in the Dossier at page 9.

46. As noted in the Dossier, Sheikh Qaradawi has repeatedly condemned al-Qaeda and even urged Muslims to give blood after the September 11th attacks. At the time, he issued a Fatwa (or religious ruling) declaring:

Islam, the religion of tolerance, holds the human soul in high esteem, and considers the attack against innocent human beings a grave sin, this is backed by the Qur’anic verse which reads:

Who so ever kills a human being for other than manslaughter or corruption in the earth, it shall be as if he has killed all mankind, and who so ever saves the life of one, it shall be as if he had saved the life of all mankind," (Al-Ma’dah:32).

A true and accurate copy of this Fatwa is attached hereto as Exhibit E

47. In fact, after September 11th, the United States Department of State prepared and circulated a brochure quoting extensively from Sheikh Qaradawi in a favorable manner. Sheikh Qaradawi's photograph and Fatwa appear on page three of the brochure, immediately following quotes from President Bush. A true and accurate copy of the brochure is attached hereto as Exhibit F.

48. After the Bali bombings in 2002, Sheikh Qaradawi called the attacks barbaric and immoral.

49. Sheikh Qaradawi issued a Fatwa in support of the United States' invasion of Afghanistan and urged Muslims to join the coalition, even if it meant fighting against fellow Muslims (in that case, the Taliban) in Afghanistan.

50. Sheikh Qaradawi has condemned all hostage-taking, particularly hostage taking in Iraq, saying it is banned under Islamic law. See Exhibit D, pp. 7-8.

51. Sheikh Qaradawi has issued Fatwas against the United States' invasion of Iraq. In August, 2003, he was one of ninety-three (93) prominent Muslim figures who called upon Muslims around the world to support the resistance against the United States' occupying forces in Iraq. He has made clear that Iraqis and Muslims have the right to defend themselves against what he perceives to be an invading army. Sheikh Qaradawi is not alone in his criticism of the United States' invasion of Iraq. Most mainstream Christian religious leaders (Catholic and Protestant) also oppose the war.

52. After a dispute arose as to whether Sheikh Qaradawi had actually condemned the killing of civilians in Iraq, he made clear, through a September, 2004 letter he wrote to Al-Hayat newspaper in London, that he never issued any such ruling. He has specifically said:

I have not published a Fatwa on this issue. At the Egyptian Journalists' Union a few days ago I was asked about the permissibility of fighting against the occupation in Iraq, and I answered that it is permitted. Afterwards I was asked concerning the American civilians in Iraq and I merely responded with the question – are there American civilians in Iraq? It is a matter of common knowledge that in Fatwas such as these I do not use the word 'killing' but rather I say 'struggle,' which is a more comprehensive word than the word 'killing' and whose meaning is not necessarily to kill. In addition, I have condemned the taking of hostages on a number of occasions in the past and have demanded that they be released and that their lives *not be threatened*.

A true and accurate copy of Sheikh Qaradawi's comments are attached hereto as Exhibit G. Moreover, Mayor Livingstone's Dossier correctly notes that a leading Arab journalist obtained a tape recording of Sheikh Qaradawi's alleged remarks about the killing of civilians in Iraq and confirmed that Qaradawi's remarks had been completely misrepresented. See Exhibit D, p. 12.

53. Sheikh Qaradawi has received the greatest criticism, and caused the greatest controversy in the United States for his views on suicide bombings against Israel. I wish to make clear that I do not support his position on suicide bombings and I understand that the ISB does not support his position either. Sheikh Qaradawi has said "Islam never allows a Muslim to kill the innocent and the helpless." Nevertheless, he claims that Palestinian suicide bombings "are not in any way included in the framework of prohibited terrorism, even if the victims include some civilians." He has explained that this is so because Israel is "a society of invaders" and that "when Palestinians face such unjust aggression, they tend to stem bloodletting and destruction and not to claim the lives of innocent civilians."

54. Sheikh Qaradawi has repeatedly denied that his position on suicide bombings in Israel makes him anti-Semitic or anti-Jewish. He has stated: "we do not hold any enmity toward Jews" and "Judaism is regarded as a message with a divine origin

and a high status.” He has repeatedly emphasized that “we do not fight Israelis because they are Jews but because they took our land, killed our children and profaned our holy places.” See Exhibit D, p. 6.

55. Sheikh Qaradawi has made statements condemning suicide attacks outside of the Palestinian territories and on those other than Israeli targets. In particular he has been quoted as stating that he “agree[s] with those who do not allow such martyr operations to be carried out outside the Palestinian territories.”

56. For example, on March 20, 2005, Sheikh Qaradawi issued a condemnation of a suicide car-bombing that had occurred in Doha, Qatar the day before. Sheikh Qaradawi issued a statement: “Such crimes are committed by insane persons who have no religious affiliation and play well into the hands of the enemies.” and “I urge all Qataris to stand united in facing such an epidemic and uproot it to nip the infection in the bud, otherwise it will spread like wildfire. I, in the name of all scholars in Qatar, denounce such a horrendous crime and pray that it would be the last and implore God to protect this secure country.” A true and accurate copy of Sheikh Qaradawi’s remarks are attached hereto as Exhibit H.

57. The Defendants’ statements condemning the ISB as radical and worse because they years earlier voted to offer Sheikh Qaradawi an honorary trusteeship is thus inexcusably simplistic and highly misleading. At the time the ISB made its offer, Sheikh Qaradawi was regarded nearly universally as an Islamic scholar of the highest caliber and a moderate. I also understand that the Defendants have based a part of their attack on the ISB on the fact that a videotape made by Sheikh al Qaradawi was played at the ISB expressing support for the ISB’s new Mosque and Cultural Center project. I have not

reviewed the videotape myself but have reviewed a copy of his comments, which have been translated into English. A copy of the translated text is attached hereto as Exhibit I.

58. Assuming the translation of Sheikh al Qaradawi's comments are accurate, the videotape is an innocuous statement of the religious bases for Muslims to support the Mosque financially. It is not a political statement. It does not reference any aspect of the Israeli-Palestinian conflict or the issue of suicide bombings. It is simply an expression of support for a project which includes a cultural center dedicated to inter-faith dialogue and understanding. Indeed, the videotape message in support of the project is an indication of Sheikh Qaradawi's support for such efforts to promote an understanding of Islam.

The Contents of the ISB Library

59. The Defendants' suggestion that because the ISB library contains works from authors such as Sayid Qutb, Mawlana Mawdudi, Ahmad Sakr, Ibn Taymiya and others that this means that the ISB promotes or supports radical Islam truly is absurd. By way of example, the Boston Herald reported that the ISB library had a "noticable Muslim Brotherhood flavor." Neither Mawdudi nor Ibn Taymiyya (who lived centuries before the Brotherhood was founded) were Muslim Brothers nor, as far as I know, is Ahmad Sakr.

60. Had the Defendants performed even the most minimal investigation, they would have discovered that the works of these authors are contained in most well-regarded libraries which maintain publications by Islamic scholars and religious leaders. This includes the libraries at the Library of Congress, Harvard College, Georgetown University and others. In fact, given my background, I would consider works from any of these authors essential in trying to understand and appreciate Islam, the history of the

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