

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

STANLEY BOIM, Individually and  
as Administrator of the Estate  
of DAVID BOIM, Deceased, and  
JOYCE BOIM,

Plaintiff,

-vs-

No. 00 C 2905

QURANIC LITERACY INSTITUTE,  
et al.,

Defendants.

Videotaped continued deposition of RAFAQ JABER  
taken before Sylvia A. Gerut, C.S.R., and Notary Public,  
pursuant to the Federal Rules of Civil Procedure for the  
United States District Courts pertaining to the taking  
of depositions, at Suite 3000, 225 West Wacker Drive, in  
the City of Chicago, Cook County, Illinois, commencing  
at 11:00 o'clock a.m. on the 28th day of July, A.D.  
2003.

PRESENT:

WILDMAN, HARROLD, ALLEN & DIXON  
By MR. RICHARD M. HOFFMAN  
225 West Wacker Drive  
Suite 2800  
Chicago, Illinois 60606-1229  
(312) 201-2000

on behalf of the Plaintiffs;

HEDLUND & HANLEY, LLC  
By MS. SARAH J. DENEEN  
30 W. Monroe Street  
Suite 500  
Chicago, Illinois 60603  
(312) 441-8615

on behalf of the Defendant,  
Holy Land Foundation for Relief and  
Development.

JAMES R. FENNERTY & ASSOCIATES, L.L.C.  
By MR. JAMES R. FENNERTY  
36 South Wabash  
Suite 1310  
Chicago, Illinois 60603  
(312) 345-1704

on behalf of the Defendants,  
American Muslim Society and  
Islamic Association for Palestine.

VIDEOGRAPHER: LEGAL VIDEO SERVICES, INC.  
MR. BRUCE WITTY.

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CONTINUED DEPOSITION OF  
RAFAQ JABER

07/06/03

EXAMINATION BY:

PAGE

Mr. Hoffman  
Mr. Fennerty

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THE VIDEOGRAPHER: This is Bruce Witty of Legal  
Video Services, Incorporated. 205 West Randolph Street,  
Chicago, Illinois. I am the operator of this camera and  
this videotaped deposition of Rafeeq Jaber, as being  
taken pursuant of Federal Rules of Civil Procedure on  
behalf of the Plaintiffs.

We're on the record on August 6th, 2003. The  
time is 10:35 a.m. as indicated on the video screen. We  
are at 225 West Wacker Drive, Chicago, Illinois.

The case is captioned Stanley Boim, individually  
and as administrator of the estate of David Boim,  
deceased, and Joyce Boim versus the Quranic Literary  
Institute, et al., Case Number 00 C 2905.

Will the attorneys please identify themselves  
for the video record?

MR. HOFFMAN: For the record, Rick Hoffman on behalf  
of the Plaintiffs. Also with me here today are two of  
our summer associate clerks, Dave Rotenberg and Debra  
Morgan.

MR. FENNERTY: And James Fennerty, that's  
F-e-n-n-e-r-t-y, on behalf of Rafeeq Jaber who is here  
today.

MS. DENEEN: Sarah Deneen on behalf of Defendant  
Holy Land Foundation.

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1 THE VIDEOGRAPHER: The court reporter today is  
2 Sylvia A. Gerut from Sylvia Gerut Reporting. Will the  
3 court reporter please swear in the witness.

4 (Witness duly sworn.)

5 THE VIDEOGRAPHER: Please proceed.

6 RAFEeq JABER

7 recalled as a witness herein, having been previously  
8 duly sworn, was examined upon oral interrogatories and  
9 testified as follows:

10 EXAMINATION

11 by Mr. Hoffman:

12 MR. HOFFMAN: Q Mr. Jaber, during your last session  
13 of your deposition, you had testified that you had  
14 previously given a deposition before, do you recall  
15 that?

16 A Yes.

17 Q Okay. Could you please tell me how many times  
18 you've been deposed before?

19 A Before last time?

20 Q Before the last time. Let's not count the last  
21 time we were here together.

22 A I think once.

23 Q Can you tell me --

24 A I don't think more than once.

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1 Q I'm sorry?

2 A I think once. I don't remember more than that.

3 Q Can you tell me what type of a case it was that  
4 you gave a deposition in?

5 A I don't even remember. It's been so long. But  
6 it will come back to me, and I'll tell you. But I don't  
7 remember at this moment what it is exactly.

8 Q Okay. Was it a lawsuit in which you were  
9 personally a party or was it a lawsuit in which you were  
10 a what we call a third-party witness, a witness who was  
11 not a plaintiff or a defendant in the lawsuit?

12 A I don't recall exactly, but I remember I had a  
13 deposition. But what was it for, what was it for, I  
14 know I was not part of it. It was not against me I mean  
15 per se.

16 Q So you were not a defendant?

17 A No. Ad I was not a defendant, no.

18 Q Okay.

19 A But I'm trying to remember exactly what it was.

20 Q Okay. If it comes back to you, will you let me  
21 know?

22 A Sure.

23 Q We also had some discussion during your last  
24 session of your deposition about Exhibit No. 2, and I

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1 have provided you here with a stack of the exhibits we  
2 used last time. We may refer to some of them  
3 occasionally. Discovery -- Exhibit No. 2 was some  
4 discovery responses prepared on behalf of AMS and IAP.  
5 Do you recall that we had some discussion about those  
6 discovery responses?

7 A Yeah, we talked about it last time. I remember  
8 now what it is for. I think that -- it just came to me.  
9 It just escaped me. Yeah, that's that hotel. Somebody  
10 drowned into a hotel room, and my organization, the IAP,  
11 had held that conference at that hotel, Ramada Inn, and  
12 there was a civil lawsuit for the parents of the  
13 deceased against the hotel.

14 Q Okay. You're referring now to the deposition  
15 that you couldn't remember a minute ago?

16 A The deposition, yeah. It came to me. I'm  
17 getting a little old. But that's okay.

18 Q I appreciate it. I just want to make sure on  
19 the record which question you're answering.

20 Getting back to Exhibit No. 2, the  
21 interrogatory responses and the document responses, you  
22 recall that there were a number of responses to document  
23 requests that we had talked about in which the answer is  
24 investigation continues, and I asked you a series of

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1 questions about what investigation it was that was  
2 performed at the time those discovery request responses  
3 were submitted?

4 A Yeah, just speak when you said. I don't  
5 remember them exactly what they are, but all the  
6 inquiries, and I told you that either we had it or we  
7 would try to dig into it. We looked into them, and we  
8 did our best to bring all the documents or anything that  
9 we have in our possession, and we send you whatever we  
10 find out.

11 Q Okay. The reason I wanted to follow up is  
12 during the course of the first session of your  
13 deposition, I tried to get you to differentiate if you  
14 could between the steps you had taken at the time that  
15 those responses were submitted, and you indicated  
16 investigation continues as opposed to efforts that have  
17 taken place subsequently, and your testimony was that  
18 you really wouldn't -- couldn't recall. And what I  
19 wanted to find out today is whether as you sit here  
20 today you are able to recall what particular steps were  
21 taken at the time those discovery responses were  
22 submitted when the indication investigation continues,  
23 what had been done to date?

24 A You're talking about the last requests?

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Q The requests that are in front of you there, Exhibit No. 2?

A Which one are you talking specifically so I can tell you?

Q Let me borrow that for a moment. I'll point you to specific requests.

A Sure.

Q If you look at Interrogatory No. 11 and Document Requests 2, 4, 5 and 6 and 11, in each instance, the response is only investigation continues, and my question is as you sit here today, can you recall what steps had been taken at the time these responses were submitted to gather responsive documents?

A Okay. Which response again? I'm sorry. The number?

Q 2, 4 --

A 6

Q 5, 6, 11?

A That's request for production, is that what you're talking about?

Q Yes, exactly.

A Page 7?

Q Yes. And if you look at No. 2, for example, under response, it says investigation continues. Do you

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see that?

A Yeah. We gave you whatever we have and all the reports, the statements that -- financial statements and the annual reports that we found out.

Q Well, now, as we've seen during the course of this, we've received some documents from IAP in different stages. There's materials that you've given us at one point in time, there's other materials you've gone back and provided subsequently, and what I'm trying to determine is at the time these responses were prepared, what investigation had been conducted to identify responsive documents, can you recall?

A Well, actually what these -- some of the documents we talked about from this deposition that we were not asked about it specifically. All the generality. Then when we talked about last time in the deposition that you were specific about certain things you wanted, which was not specific before, and I says we look into these things what we have.

So for instance, like there was nothing about something we kept as ledger by hand except other than the computer. I says yes, we did, and we brought you these questions.

So whatever we did the same steps we did before

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that we looked into our records about the certain things that you want. I mean I did not move the whole office and bring it to you here, just specific whatever you wanted or you requested the second time, we did the same thing like we went through our computers or whatever, files that we have to look them up.

Q So if I understand your testimony correctly, the steps that you have taken to identify responsive documents as you've testified to in your first session of your deposition were the same each time you were asked to go look for documents, the only difference would be that in subsequent cases, you were looking for more specific items?

A Yeah, the same steps, because only the same steps we go through the computers, whatever records we have in our files and so forth.

Q And did the -- without getting into specific communications you had with Mr. Fennerty, did you work with him at all in terms of determining what sorts of efforts to undertake to review documents prior to submitting this response?

A Yeah, we send me the copy, you know, what you sent to him and ask me to look whatever we can. I says yeah, we look everywhere, we can the additional thing.

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The only thing that different probably that you asked if you wanted somebody to look into the computers that broke or something, because I'm not an expert on computers. I had to go look, you know, something in the hardware, something like that. And he recommended somebody, and that person came to our office. And I says here are the computers. I don't know, whatever, you know, look whatever these things in there. Because no other way. There's nobody in our office or the people who work with us that has that capacity or capability of, you know, getting into the computer.

So he did. And we got -- put them all on whatever we recovered from that, we put them on if I remember I think on a diskette or on a CD or something, and we send it to you.

(Document marked as Exhibit No. 36 for ID.)

Q Okay. Mr. Jaber, you've been handed what's been marked as Exhibit 36. This is a document that was submitted in this case by your organization, the AMS as well as IAP in connection -- as an attachment to a pleading. It's an affidavit that you signed, is that correct?

A Hm-hm. Yes.

Q Who prepared this affidavit?

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1 A My lawyer.

2 Q Mr. Fennerty?

3 A Yes.

4 Q And at the time that this affidavit was  
5 prepared, what efforts did you undertake to assure that  
6 the statement that's contained in this affidavit was  
7 accurate?

8 A We did whatever we can. We searched our office,  
9 you know, our files, whatever we can find, and we did  
10 the same procedure, the same routine that we did after,  
11 still the same thing. We do the same procedures. Only  
12 different, like I said, we never thought of it, because  
13 the computer we cannot do anything about except until we  
14 got that professional to help us dig those, you know,  
15 whatever in there.

16 Q Now, when you talk about doing the same things  
17 you had done before, in connection with submitting this  
18 affidavit, did you go back again to make sure that you  
19 hadn't missed anything or were you relying on the prior  
20 searches?

21 A No, we did. I asked the people who work in the  
22 office and to look into everywhere, every possible,  
23 wherever it is, to dig them out, whatever information  
24 requested specifically and to have them ready. And we

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1 did the same thing.

2 Q Okay. I'm not sure if that answered my  
3 question. I guess what I need to know is when you  
4 submitted this affidavit, did you rely on prior searches  
5 to say that everything was complete or did you go back  
6 and confirm that?

7 A Yeah.

8 Q You confirmed?

9 A Yes.

10 Q Okay. Now, the statement in here that to the  
11 best of your knowledge, the attached documents is  
12 complete, was that statement made with respect to both  
13 IAP and AMS documents or only AMS?

14 A No, it was IAP from the time I was president to  
15 on the AMS when I was president.

16 Q In preparing this affidavit and executing it,  
17 did you go back again to the folks at IAP and Dallas and  
18 contact them to make sure that they had given you  
19 everything?

20 A Not on IAP and AMS, only later on when you asked  
21 me, I think, about Dallas. And I called them and I says  
22 whatever information you have, you should get them ready  
23 and send them to us, which is specifically like  
24 documents for financial statements, bank accounts, bank

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1 statements, checks, whatever they have. And they  
2 gathered whatever they have, and they sent it to us, and  
3 then we sent them to you in turn.

4 Q Oka. You know, let me go back. I want to make  
5 sure that we're clear on this. We had talked before  
6 about using the term IAP Dallas versus IAP National. So  
7 let me -- let me go back to clarify your answer. When  
8 you prepared this affidavit, did you take any steps to  
9 go to IAP Dallas to confirm whether they had any  
10 additional documents or materials?

11 A IAP Dallas has nothing to do with me. I was not  
12 responsible for. It's a separate entity. So I did not  
13 have anything to do with them. I did what it is for  
14 National IAP, Nationally AMS.

15 Q So when you state in your affidavit that the  
16 attached documents is complete, you're referring to the  
17 production of AMS or IAP National and not IAP Dallas, is  
18 that correct?

19 A That's correct.

20 Q Okay. Does AMS have an internet service  
21 provider?

22 A No, the IAP only we have.

23 Q IAP National?

24 A Right.

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1 Q Okay. Do you know whether IAP Dallas has an  
2 internet service provider?

3 A I don't know if they had or if they have.

4 (Document marked as Exhibit No. 37 for ID.)

5 Q Mr. Jaber, you've been handed what's been marked  
6 as Exhibit 37. It's a collection of documents Bates  
7 numbered IAP 2743 through 2755. I'll represent to you  
8 that this is part of the most recent production of  
9 documents that was provided by you subsequent to your  
10 last deposition session, and I wanted to ask you some  
11 questions about these documents. First of all, these  
12 documents appear to be documents generated from or  
13 gathered from IAP Dallas, is that correct?

14 A Yes, that's what looks there.

15 Q And who at IAP Dallas did you deal with to get  
16 these documents?

17 A Well, they have employees who work there,  
18 part-timers, and sometimes the guy who had more  
19 knowledge of it was, we asked them, whatever you have  
20 there, just submit it.

21 Q So who was the person, though, that you dealt  
22 with?

23 A Like I said, there's two people who are there.  
24 Usually if I call for them, you know, and they're there,

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1 I tell them that's what we want, and they'll look  
2 whatever we have. There's two employees or part-timers.  
3 And I also sometimes talk to Osama Mohammed, and he will  
4 ask them to produce whatever that he has if he knows  
5 anything about it.

6 Q The two employees I think you had testified  
7 earlier, the two Mohammeds, is that who you're referring  
8 to?

9 A Yes.

10 Q Okay. And you don't recall which one of those  
11 two gentlemen you may have spoken with in connection  
12 with this particular document?

13 A No, not really.

14 Q All right. And, I'm sorry. And you said that  
15 there was somebody else that you had spoken to, was it  
16 Osama?

17 A Osama Mohammed.

18 Q Mohammed. Okay. And do you know what is his  
19 position currently with IAP Dallas, do you know?

20 A He doesn't have any official capacity, you know,  
21 with IAP Dallas. Just he is a volunteer, and he works  
22 for a long time as a volunteer.

23 Q Okay. Make sure I'm pronouncing, is that --  
24 Osama's last name is spelled is it A-h-m-a-d?

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1 A No, Hamad.

2 Q Hamad, H-a-m --

3 A Mohammed.

4 Q Hm?

5 A Mohammed.

6 Q Osama Mohammed?

7 A Osama Mohammed.

8 Q Okay. I don't think that's a name we talked  
9 about last time, is it?

10 A I don't remember.

11 Q Okay. Referring to Exhibit 37, these appear to  
12 be various invoices and documents from Infocom  
13 Corporation, are you familiar with Infocom?

14 A A little bit. The news.

15 Q What is your familiarity with Infocom, what do  
16 you know about them?

17 A Not much except I think they are computer, they  
18 sell computer, deal with computer stuff and, you know,  
19 that's all what I knew until had the news when they said  
20 they was searching, you know, the FBI sort of went over  
21 their headquarters and took their computers. Then I  
22 found out that they provide services and internet  
23 services, but I don't know much about their operation.

24 Q I take it from your testimony that you've never

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1 had any personal dealings with Infocom?

2 A No, I never.

3 Q The first page is an invoice, and it is dated  
4 4-1-01 billed to IAP In North America, that would be IAP  
5 Dallas?

6 A Dated 4 what?

7 Q The first page, if you look under date on the  
8 right-hand side?

9 A Yes. Okay. I see that.

10 Q The description of the services provided is a  
11 Domain Name REG, R-e-g, IAP, do you know what that  
12 relates to?

13 A I have no idea.

14 Q Does the IAP National website, is any aspect of  
15 getting that registered handled through IAP Dallas?

16 A Maybe. I don't know.

17 Q So it's possible that this domain name  
18 registration may have related to the IAP National  
19 website, you just don't know?

20 A Anything is possible. I don't know.

21 Q Okay. And you'll see the salesperson listed is  
22 Basman Elashye, you know him to have been the president  
23 of IAP Dallas, correct?

24 A Yes.

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1 Q If you turn to the second page, there's a  
2 statement dated 10-20-98, and it lists the customers IAP  
3 In North America, and then there's a mobile phone number  
4 for Osama, do you know is that Osama Mohammed or who  
5 that is?

6 A I have no idea.

7 Q Okay.

8 A Your guess is as good as mine. Where is the  
9 phone number?

10 Q Mobile Osama 841-3143 under IAP In North America  
11 at the top?

12 A Oh, okay. I don't know.

13 Q I take it that you don't have any knowledge then  
14 about what services are described in this particular  
15 statement?

16 A No.

17 Q If you look at there's an entry here for 8-1-98,  
18 it says August '98, IAP and CAIR, C-A-I-R. Now, you're  
19 familiar with CAIR, aren't you?

20 A Yes.

21 Q Do you know why it is that CAIR would be  
22 reflected or referenced in this bill from Infocom to IAP  
23 Dallas?

24 A I have no idea. This is the first time I see

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1 it, I know about it.

2 Q Are you aware of any relationship that CAIR has  
3 with IAP Dallas?

4 A Any relationship, official relationship?

5 Q Yes.

6 A None whatsoever.

7 Q Are you aware of any relationship that CAIR has  
8 with IAP National?

9 A No. They have no relationship whatsoever,  
10 because I was one of the founders of CAIR. So we had no  
11 relation. All separate. Has different missions has  
12 altogether different than the IAP.

13 Q Now, you mentioned that you were -- you  
14 testified earlier that you're a founder of CAIR, are you  
15 still active in that organization?

16 A No.

17 Q When did your activities cease?

18 A I think when I took over the IAP National that I  
19 resigned from CAIR.

20 Q In 1996?

21 A Conflict of interest.

22 Q Okay. 1996 then?

23 A Something like that.

24 Q Turning to the third page, there are some

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1 handwritten notes at the bottom. This is a statement  
2 for an invoice there, an amount due \$2,795, and at the  
3 bottom there's a handwritten note that says balance  
4 zero, \$2,500 donated plus 1999 internet service. I  
5 assume I know the answer to this, but do you have any  
6 idea what that note refers to?

7 A No, I have no idea. Like I said, all these, I  
8 never seen them. I don't know the relationship between  
9 IAP of North Dallas with Infocom. I don't have anything  
10 to do with their balance sheets or checks and what they  
11 do, because it's a separate organization altogether than  
12 what I was in charge of -- what I'm in charge of.

13 Q I know I asked you before about whether you knew  
14 who Osama was as referred to in these documents. Do you  
15 know of any other people named Osama who were actively  
16 involved with IAP Dallas other than Osama Mohammed who  
17 you've already mentioned?

18 A The other Osama is the one in charge of the  
19 editor of the Al-Zaytuna.

20 Q I'm sorry. His last name again was?

21 A Abu, A-b-u Irshaid, I-r-s-h-a-i-d.

22 Q Other than Abu -- Osama Abu Irshaid or  
23 Osama Mohammed, do you know of any other Osamas who were  
24 actively involved with IAP Dallas?

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1 A No.

2 Q If you turn to the page marked IAP 2748, this  
3 invoice up on the upper left-hand corner indicates that  
4 it was ordered by Hassan, do you know anyone who was  
5 actively involved at IAP Dallas in or around 1997 whose  
6 first name was Hassan?

7 A That would be probably Hassan Sabri. That's my  
8 guess.

9 Q On Page 2753, there are some handwritten notes  
10 at the bottom, do you recognize that handwriting?

11 A No.

12 Q I take it it's not yours?

13 A No, it's not mine.

14 Q And there's a reference on the Item No. 3  
15 transferred to CARE, this time spelled C-A-R-E, although  
16 the next page has a reference to transfer to CAIR,  
17 C-A-I-R, do you have any idea what this reference to  
18 transfer to CARE is about?

19 A No. It's the same amount. It's the same amount  
20 as in 3 on the second page.

21 Q Right. Now, when was CAIR formed?

22 A I think in 1995 to the best of my knowledge and  
23 recollection.

24 Q You testified that its mission was different,

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1 and that there was -- might be some conflict of interest  
2 with you being involved with both CAIR and IAP National.  
3 What is CAIR?

4 A CAIR is a civil right organization that takes  
5 care or concerns itself by the civil liberties and the  
6 civil rights of the Muslim communities of North America.

7 Q What is it about CAIR's mission that led you to  
8 believe that there could be a conflict of interest in  
9 your being actively involved in both that and IAP  
10 National?

11 A Well, the mission of the IAP is different. The  
12 mission of the IAP is very specific about the  
13 Palestinian cause to promote it and to explain the other  
14 side of different point of view that usually is  
15 presented by the Israelis and their supporters in the  
16 United States, which is completely different. We don't  
17 want people to get confused with these things.

18 So just a judgment that I don't think that  
19 would be appropriate, plus time-wise would be almost  
20 impossible for me to be on the board, you know, on CAIR  
21 and then IAP at the same time would be just very  
22 difficult.

23 Q Are you aware of anybody else who was actively  
24 involved in IAP, and by that I mean any other officers

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or directors of IAP National during the course of the years who were also actively involved in CAIR?

A Not when -- when it was founded CAIR that whoever had any relationship with IAP was severed, all of it.

Q I'm sorry. Was what?

A Severed.

Q Oh, severed?

A Severed.

Q So it's your understanding that anybody who had -- who was involved with IAP would not have been involved actively with CAIR?

A Not at the same time.

Q Who were the other co-founders of CAIR with you?

A Omar Ahmad and Nihad Awad.

Q Do you know whether both of those gentlemen are still actively involved with CAIR?

A Yes, they are, to the best of my knowledge.

Q Are you aware of any relationship that CAIR has to Infocorn?

A No, I have no.

Q Since the last time we met, what efforts have you taken to determine what documents IAP Dallas might have that would be the subject of the discovery requests

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in this case?

A As I indicated earlier in the questions before this one, I said to you we got into the computer, we got the professional to look if there's anything in the hardware that we deleted that, you know, for the case that you wanted. And whatever documents we found and we looked into, you know. So the same thing, we brought it to you all specifically was requested.

Q That's with respect to IAP Dallas, the computers?

A No. I'm talking about IAP Chicago.

Q Okay. All right. My question is focused on IAP Dallas?

A Well, IAP Dallas, as you know, I don't have any much knowledge about it, what their operation or whatever documents they have.

Q I understand. What I'm trying to determine is what steps, if any, you took since the last time we were here to either learn more about the operations or to identify additional documents?

A I asked them the same question, do you have any more things or documents. I said we gave you whatever we have.

Q Okay. So you didn't go down there?

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A I was there. No, I was there actually last month.

Q Okay. And when you were down in Dallas at the IAP Dallas offices, did you work with them to try to identify documents that might be responsive to the Plaintiff's discovery requests?

A I asked them the same question, if you have any documents that's responsive that or needed to be given to us other than what you described, just give it to us. There's nobody there as I told you. Even those two part-timers practically are not there. The office, almost there's nothing much in it.

Q Were you able in your visit to Dallas to learn anything more about how IAP Dallas maintains its records or what kinds of documents it has?

A Oh, yeah. I met with the accountant, and he has all the records, and I asked him the same thing, all the documents that you send, for instance, I said I gave to you whatever we have. So I met with them. And as a matter of fact, I told them to do me a whole complete things about Dallas and all the information things to transfer to me. I want to take a look at them before -- actually, I want to close it down. There is no need for. It does not function anymore. I cannot run it

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either so --

Q All right. Let me take a step back. Who is the accountant that you talked to?

A His name is Hisham, I think or Hisham, H-i-s-h-a-m. I don't recall his last name.

Q How is it that you got in touch with this individual, I mean did you have his name from someplace that you recall?

A Oh, yes. I got his name from Osama before he left. And people know that he was the accountant, because he does all their work regularly for years.

Q Okay. So you contacted him then and asked him --

A Yes.

Q -- to go through with you any financial information, any financial documents that IAP Dallas might have?

A No. I asked him to prepare all the things that he has, to prepare all the financial statements, and I need the whole thing, whatever he has, to complete it and to complete the closing of the office.

Q Now, with respect to the closing of the office, has that in fact happened yet?

A Not yet, no. In the process.

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1 Q Is there -- is it your intention to irrespective  
2 of whether you closed the office to close down the  
3 corporation, in other words to contact the state and say  
4 that we are dissolving the corporation?

5 A Yes, exactly.

6 Q My recollection is that there were aspects of  
7 the IAP National operation that did operate out of  
8 Dallas, I think you had testified to some matters  
9 relating to the publication of Al-Zaytuna as well as the  
10 merchandise that were conducted out of Dallas, do you  
11 recall that?

12 A Yes.

13 Q And what is the -- what was your interpretation  
14 in terms of what will happen with those operations once  
15 you close down IAP Dallas?

16 A Well, Al-Zaytuna publication, either move it to  
17 Washington, because the editor is in Washington anyhow  
18 or if it's not feasible just transfer from Chicago,  
19 because it's not that hard to run it actually. We don't  
20 need Dallas for it anymore. Actually it's expense  
21 business-wise does not make sense anymore. We did this  
22 actually discussed over two years ago before even this  
23 case came about that we need to -- there's cause that  
24 unnecessary that we can do without.

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1 Q Now, is it your anticipation that there would be  
2 a local chapter of the IAP in the Dallas area even after  
3 the IAP Dallas office is shut down?

4 A Well, this is a matter that did not come up. We  
5 are not thinking about anything like that. But that  
6 doesn't mean we're no gonna -- in the future that if  
7 there's a need for it, we'll do it. But at this point,  
8 there's no plans, no discussions of that nature.

9 Q I think you had testified the last time that IAP  
10 Dallas had some of its own functions that it conducted  
11 down in the Dallas area, that you attended various  
12 activities tied to holidays or festivals, fund raising,  
13 et cetera. Is it your anticipation now that those will  
14 not be continued in the future?

15 A No, I cannot say that. The future only God  
16 knows. I don't know.

17 Q Well, do you have -- have you come up with any  
18 ideas or plans as to how those programs would take place  
19 if IAP Dallas is closed down?

20 A When it comes, if there's, you know, we'll deal  
21 with it when it comes. There's a need for it if it  
22 comes, if somebody will help us to put something  
23 together, we'll do it. If there isn't, there isn't.  
24 We'll deal with it when it comes.

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1 Q Okay. But I guess my question is is there any  
2 current plan to address that?

3 A Not at this moment.

4 Q Getting back to the efforts that you took while  
5 you were down in Dallas to get a better understanding of  
6 the IAP Dallas documents and what might exist and how  
7 they're organized, you testified about meeting with the  
8 accountant. Did you take any other steps to get a  
9 better understanding of IAP Dallas documents?

10 A No, not more than just meeting with the  
11 accountant. That's what I needed to do. Most important  
12 thing in my mind that to see the financial aspects of.

13 Q Did you personally do any looking or searching  
14 while you were down there in the IAP Dallas office to  
15 see if there were any materials that might have been  
16 missed?

17 A Not specifically, no.

18 Q You mentioned Mr. Osama Abu -- is it pronounced  
19 Irshaid?

20 A Abu Irshaid.

21 Q I'll never get it right.

22 A Abu Irshaid.

23 Q Irshaid.

24 A That's close enough.

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1 Q Irshaid.

2 A Irshaid.

3 Q Have you since the last deposition session  
4 talked to Mr. Abu Irshaid about whether he has any  
5 additional materials that might have been called for in  
6 our document request?

7 A Abu Irshaid just look over not too long ago. So  
8 he doesn't have any knowledge of all these things. He  
9 just about a couple years ago took over the Al-Zaytuna,  
10 and his mission is just only editing. It has nothing to  
11 do with bookkeeping or documents keeping or file  
12 keepings or anything like that.

13 Q So I take it from your answer that you didn't  
14 have any subsequent conversations with him about whether  
15 he had any documents?

16 A The only thing I asked him if he has any copies.  
17 Actually he's looking for the copies, because he wants  
18 to keep for himself for as reference in the future as an  
19 editor of the paper. He talked to me about it. I says,  
20 well, I don't know of any. I don't know where those  
21 copies are. I don't know if there is any. Look around.  
22 He looked around probably in Dallas. I says look, if  
23 you find them, take them. I don't know if they keep.  
24 Like I told you before, we are not that big organization.

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1 with that big people, many people, that who can work and  
2 document things. So the easiest thing, you're done with  
3 it, throw it away, unfortunately.

4 Q Okay. When you're talking about copies now,  
5 you're talking about copies of old editions of  
6 Al-Zaytuna?

7 A No. These are copies that he edited himself or  
8 he was part of it or written, you know, because he used  
9 to write it.

10 Q We're talking about copies of Al-Zaytuna?

11 A Right.

12 Q All right. Any other conversations you had with  
13 Mr. Abu Irshaid since your last deposition about  
14 documents?

15 A No, not about documents.

16 Q Okay. Since your last deposition session, have  
17 you undertaken any efforts to determine whether Sean  
18 Smith had any documents or materials that would be  
19 responsive to the document requests?

20 A That's why I talked to him. That's the CD or  
21 that's whatever he has in the computer, whatever  
22 information that he has.

23 Q So the CD-Rom disk of files that was sent as  
24 part of the production, those are the materials that

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1 came about as your -- as a result of your request that  
2 Mr. Smith provide you with whatever materials he had?

3 A Yes.

4 Q Now, we talked some in the last session about  
5 financial books and records, and there were a couple of  
6 additional documents produced. I wanted to spend a  
7 little bit of time asking you about that sort of fall  
8 under that broad category.

9 (Document marked as Exhibit No. 38 for ID.)

10 MR. HOFFMAN: Q Mr. Jaber, you've been handed  
11 what's been marked as Deposition Exhibit No. 38. It is  
12 a multi-page document that again I'll represent to you  
13 has been produced in the most recent batch of production  
14 by AMS and IAP subsequent to your last deposition. It's  
15 Bates marked IAP 2861 through 2867, and these appear to  
16 be a series of annual account balance reports. Are you  
17 familiar with these documents?

18 A Yes.

19 Q What is this report?

20 A Well, let's see, the account balance sheet here  
21 as of, what is it, December 31st, '02. The first one  
22 tells you what the assets and liabilities we have.

23 Q Now, can you tell me when it was that these  
24 documents, these various pages, were created?

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1 A I don't know exactly.

2 Q There is up in the upper left-hand corner of  
3 each page what appears like it could be a date of  
4 4-15-03. Are you able to tell whether that's a date,  
5 and, if so, whether it's the date that it was created?

6 A I don't know.

7 Q Is this a type of report that IAP or AMS have  
8 used in the past?

9 A Yes, that's for the summer for the board  
10 meetings and for myself when I ask for them, too.

11 Q Okay. Now, the accounts that we're referring  
12 to, are these the accounts of AMS and IAP National?

13 A Yes.

14 Q If I understand correctly, they wouldn't include  
15 any accounts for IAP Dallas, correct?

16 A Correct.

17 Q The upper left-hand corner under what appears to  
18 have been the date, there's also a reference to, it says  
19 selected accounts, do you know what that means?

20 A I don't know.

21 Q Let's turn, if you look, let's take for example  
22 the first page. There are identified under the assets  
23 column cash and bank accounts. Do you see that?

24 A Hm-hm. Yes, I see.

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1 Q All right. There don't appear to be any other  
2 types of assets identified, would you agree with me?

3 A Yes.

4 Q IAP National and AMS do have assets other than  
5 cash, don't they?

6 A It depends. You see the definition of assets  
7 for the purpose of keeping records and our organization,  
8 we don't count, you know, like some people from  
9 accounting purposes like computers or disks or, you  
10 know, stuff like that they might count as assets. But  
11 the way we do it, we don't count it, because it keeps  
12 changing. So we don't keep any of these kind of things  
13 to be added.

14 Q What I'm trying to determine is whether that  
15 reference to selected accounts was a reference to the  
16 fact that this report deals only with cash and bank  
17 accounts as opposed to other types of assets that may or  
18 may not exist?

19 A Yes, these with cash and money and liquid.

20 Q Okay. Do you know whether there are similar  
21 account balance reports of this type that relate to any  
22 other accounts other than cash and bank accounts?

23 A No, that should be the cash accounts that we  
24 have.

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Q Okay. So there wouldn't be a similar report that would show other assets or other liabilities?

A No. It should, like I said, from accounting purposes, but don't feel like these assets if it's not liquid to be added for bookkeeping purposes, because we don't have the capacity to keep updating and changing computers and all these things even though I ask personally now I says we should keep even numbers and serial numbers of computers, whatever they have. But before we never had any, because we never thought that there is any need for that.

Q Okay. So if I understand you correctly, it has not been the practice of AMS or IAP National to keep formal accounting records with respect to assets other than cash and bank accounts, is that correct?

A That's correct.

Q All right. Now, who prepared these account balance reports?

A Well, this was prepared by the man who works, you know, as the executive director Abdel Based, his name.

Q I'm sorry?

A Abdel Based.

Q Abdel Based.

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A A-b-d-e-l, B-a-s-e-d. I suppose that's the best, H-a-m-a-y-e-l, I think.

Q And we talked about Mr. Hamayel last time, right?

A Right, I think we did.

Q We did?

A To my recollection I think we did.

Q Okay. And do you know what sources of information Mr. Hamayel referred to when he created this, where he got the information that went into these reports?

A The way he has the Quicken, I think he uses Excel sometimes he uses, I don't know which one, but I think the Quicken report that whatever he has, the checks of course, the canceled checks, the bank statements that we get and whatever, you know, receipts, deposits, all these things that compose for this report on the computer. So he used a computerized account.

Q These Quicken reports that you're describing, have those reports been produced to us?

A Yeah, we produced to you. It's right there.

Q I'm not referring to the summary report that came from them, but whatever records that Mr. Hamayel referred to that you've just described, the checking

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records, the Quicken reports, whatever sources of information he used, I'm asking whether those have been produced to us?

A I'm sure they did. They did give you financial statements, the last long time ago whenever you asked for them from the beginning.

MR. HOFFMAN: Mr. Fennerty, I'm just going to request if they have been, if we could get an identification on them as to where they are or what documents those are, because I'm not sure --

THE WITNESS: If I go here, I can find it for you.

MR. HOFFMAN: Q Is it Exhibit -- look at Exhibit 8, is that what you're referring to?

A One of transaction report, let's see Exhibit 8, yeah. Exhibit 9, Exhibit --

Q Well, I think we established last time that Exhibit 9 related to IAP Dallas if you'll recall?

A Yeah. Financial report of American. This is also 1993. Exhibit 10, Exhibit 11, Exhibit 12, 13. And we gave you all these records for the government, 14, 15. All these reports that you needed or you asked for, we give to you.

Q Okay. So if I understand you correctly, is it your testimony then that the records that Mr. Hamayel

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would have used to prepare Exhibit 38 are the documents you've just identified that were previously marked as exhibits at your deposition?

A Yeah, that would be the same information.

Q Okay. Now, on the first page of Exhibit 38, there are listed four different accounts, do you see that, there's an AMS and IAP bank, a CONV, which I assume is convention?

A Hm-hm.

Q And TCF General and TCF Merchant, could you tell me what each of those accounts are?

A Okay. Well, this is because they changed accounts from one bank to another. We used to have LaSalle Bank, and you have that document and everything. And LaSalle charges lot of money. We moved it to TSF -- or TCF. I'm sorry. This way they have free checking account. So we moved it. But we kept one small account in the IAP which is -- I assume that's the one, the \$867. We kept that in LaSalle for the purpose, because there is automatic with a draw that people monthly pledges, because that account is set up. So that goes into there. But whatever amount goes there, we can transfer it always to the TCF. The convention as you see it is closed, zero. We closed it, because there is

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1 no need for it anymore.

2 Q I think you testified in the last session about  
3 the two different accounts, there's the general account  
4 and the convention account, correct?

5 A Right.

6 Q So would the TCF general account correspond to  
7 the old IAP AMS general account?

8 A Yes.

9 Q And the TCF Merchant account would correspond to  
10 the old convention account?

11 A No. The Merchant is people want to buy  
12 something or they want to donate money through credit  
13 cards, that's the way to set it up.

14 Q Okay. So is there no longer a separate  
15 convention account?

16 A Not at this moment until we have a convention.

17 Q Okay. The next time a convention approaches,  
18 the plan would be to open a new account for that?

19 A Possibly.

20 Q Now, we talked about the fact that this didn't  
21 list all of the assets for the reasons you've described.  
22 The liability section, here it shows zero liabilities.  
23 Does that include all liabilities of the company or,  
24 again, is this somehow limited in focus?

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1 A Well, the liability like, again, because he's  
2 not an accountant. Like for instance if we owe some  
3 money outside, he doesn't consider that liability,  
4 because usually we pay the bills as they come. So we  
5 don't continue account payables from accounting  
6 procedure, because he's not an accountant, you know.  
7 And so the bills that come in, we pay them. There is no  
8 need to do it.

9 But actually there is other liabilities should  
10 be included like money we owe to the lawyers, stuff, but  
11 it's not. I keep trying to teach, but he doesn't learn.

12 Q I guess that's what I wanted to understand is  
13 whether this is intended to be a comprehensive list of  
14 all liabilities or is it some, you know, less complete  
15 list of the liabilities?

16 A Like I said, the liabilities from accounting  
17 procedure, he doesn't understand that. So he doesn't  
18 think of bills we owe as a liability.

19 Q Okay.

20 A Even though I try.

21 Q Let's move on to the next exhibit.

22 (Document marked as Exhibit No. 39 for ID.)

23 MR. HOFFMAN: Q Mr. Jaber, you've been handed  
24 what's been marked as Deposition Exhibit No. 39. This

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1 appears to be -- this is a multi-page document again  
2 produced since your last deposition session. Do you  
3 recognize this document?

4 A Yes, I do.

5 Q Do you know whose handwriting this is?

6 A Mine.

7 Q You had testified in your last session about a  
8 handwritten ledger, is that what this is?

9 A Yes.

10 Q And am I correct that this ledger generally  
11 speaking corresponds to Exhibit No. 8 which was the  
12 transaction report for AMS?

13 A No, not necessarily, because like I said, I  
14 stopped doing it, because time, you know, I don't have  
15 the time to do it. So I stopped at certain points doing  
16 it. And then I started doing it on the computer,  
17 because you start doing it on the computer found out,  
18 well, there is no need to duplicate everything. But in  
19 my profession as a financial planner, I always used to  
20 do things by hand. But then finally I found out I don't  
21 have the time. So it changed or converted to the  
22 computer handling of it.

23 But these are my -- as a matter of fact, the  
24 last pages, these are not my handwriting. It's a

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1 different handwriting. Like 62, for instance, which I  
2 opened here, 61, 60, because this is not my handwriting.  
3 Actually I hired an accountant to go over the checks and  
4 balances, write them himself, because I don't have the  
5 time. So he actually start writing these things himself  
6 from 59. If you see that, that's not my handwriting.

7 Q So from Page IAP 3159?

8 A Yeah, that's the accountant. And I gave him the  
9 books, and I says you bring it up to date, and he did  
10 the auditing, too. You know, up to date.

11 Q Would it be fair to say, though, that there is  
12 some overlap of the information that's here and what's  
13 in Exhibit 8 in terms of checks that were written on  
14 these accounts?

15 A Oh, definitely.

16 Q If you'd look at the first page of this exhibit,  
17 there is at the very top before you reach Item No. 1,  
18 the Check No. 359, there's a handwritten note. It says  
19 carry forward from other -- I think that's book, is that  
20 right?

21 A Yeah, the other books, that I used there, which  
22 is like the checkbook thing.

23 Q Okay. So there was a balance that you had in  
24 there that was a carryover from what source?

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1 A Like, you know, like balance book, like  
2 checkbook we used to use, you know, when we opened the  
3 accounts. So we use that. So we carried forward the  
4 balance on there. That's to my, you know, best  
5 knowledge or recollection.

6 Q And these checkbook registers that you are  
7 referring to here on this note or the balance is carried  
8 forward, are those still in AMS's possession or are  
9 those gone now?

10 A They are gone, because we looked for everything  
11 that we have. They must have been gone.

12 (Document marked as Exhibit No. 40 for ID.)

13 MR. HOFFMAN: Q Mr. Jaber, you've been handed  
14 what's been marked as Group Exhibit No. 40. This is a  
15 series of pages that we've pulled from the most recent  
16 production subsequent to your last deposition session.  
17 First of all, do you recognize these as being copies of  
18 checks on the IAP or AMS accounts?

19 A Yes.

20 Q You had testified earlier in your last session  
21 that in addition to the bank statements, there were  
22 copies of the checks that were attached on the  
23 statements, is this what you were referring to?

24 A Yes, because they sent us copies. We don't get

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1 the physical checks.

2 Q Now, am I correct, sir, that the checks that are  
3 reflected on this Group Exhibit 40 should be also  
4 reflected on the forms -- the documents that we saw that  
5 were Exhibit 8, which was that transaction report, the  
6 computerized version?

7 A Sure.

8 Q And to the extent that you were still using it  
9 at the time, the document that we just looked at,  
10 Exhibit 39, your handwritten journal?

11 A Well, like I said, it depends when these checks  
12 were issued. If they were issued at the time when I,  
13 you know, when I was keeping record, of course reflect  
14 on the ones when I was writing. Everything should be  
15 also that statements include all these dates should  
16 reflect there check by check, yes.

17 Q On Exhibit 8?

18 A Right.

19 Q All right. Let's take a look at some of these  
20 if we could. On the first page in the upper left-hand  
21 corner, the first check we see is Check No. 551, do you  
22 see that?

23 A Hm-hm. Yes, I do.

24 Q All right. Now, that's a \$2,000 check -- I'm

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1 sorry, \$2,500 check made payable to IAP. Is that your  
2 signature?

3 A Yes, that's my signature.

4 Q Okay. When you write a check like this to IAP,  
5 is that a check to IAP Dallas or IAP National?

6 A I don't remember.

7 Q At this time in 1997, AMS was the national  
8 office for IAP, correct?

9 A Yes.

10 Q Would there have been a separate -- a reason or  
11 a mechanism for providing a check to IAP National from  
12 an AMS account in 1997?

13 A Could be, because we've established the accounts  
14 for IAP for the conventions and so forth. That's a  
15 possibility. It could be for IAP Dallas. I don't know.

16 Q All right. As you sit here today, you can't  
17 tell?

18 A No, I can't remember even.

19 Q All right. Next to that there's check 552 in  
20 the amount of \$5,000 made out to AMEL, and I think we  
21 had agreed last time that's the American Middle Eastern  
22 League for Palestine?

23 A Right.

24 Q Again, that's your signature?

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1 A Right.

2 Q And are you able to tell me just looking from  
3 this what the purpose of this payment was?

4 A Not from looking of this, but the procedure  
5 usually like I said earlier at the last deposition that  
6 when some people specifically donate to AMEL through us,  
7 and then we would transfer to them in a check, we  
8 deposit, because when they give us especially cash or  
9 something, we're not going to send cash. So we deposit  
10 in our account or something or they write on their check  
11 on the memo that this is for AMEL. They write it. Then  
12 we transfer that money to them.

13 Q Now, you mentioned the check memo, I noticed in  
14 some of these you have entries in the check memo section  
15 and others there is nothing written. Did you have any  
16 particular practice or procedure as to why some might  
17 have references and others don't?

18 A Not unless something that is not usual, okay.  
19 So we write something there to remember. But if  
20 something within the operation itself, maybe I felt  
21 there is no need for that, but there is something  
22 needed, I wanted to recognize it.

23 First of all, some of these actually, as you  
24 see, it's not my signature on them. So probably he

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1 wrote something in the memo. Like for me, like I wrote  
2 one on the 556, I wrote the date which is that to refer  
3 to the credit card probably, you know, that was paid  
4 for. So we know why we're paying LaSalle Bank this  
5 money. So I put the number, the credit card number,  
6 which I can recognize. The other is that the other  
7 personal who signed this, I don't know why he's writing  
8 it. That says practice obviously.

9 Q If you'd look at Page IAP 3070, and these aren't  
10 all sequential, but they are at least in order lowest to  
11 highest. So that should help you find it.

12 A Okay.

13 Q Now, IAP 3070 in the middle of the page on the  
14 right there's a check from the IAP convention account to  
15 IAP in the amount of \$5,000. Do you see that?

16 A Yes, I do.

17 Q It looks to be Check No. 1130?

18 A Yes.

19 Q That's your signature, correct?

20 A Yes.

21 Q On that instance, you've entered something in  
22 the memo section. Are you able to read that?

23 A No, I can't, but I know we transfer because, you  
24 know, the money was built in the convention account,

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1 okay. The purpose we have a convention account so we  
2 know what the convention does for us and how much it  
3 loses and so forth and so on. So whatever money left  
4 over, we always transfer to the general account for  
5 running the operation.

6 Q Okay. And in this instance then the payment to  
7 IAP, would that be a payment to IAP National?

8 A Most likely, yes.

9 Q If you'd look ahead to Page IAP 3078, there's a  
10 Check No. 1154. Do you see that?

11 A Yes.

12 Q All right. That one also is made payable to  
13 IAP, and there's a reference in the memo section there,  
14 can you read that?

15 A Seems like Chicago, L.A. and New Jersey  
16 something. I don't know that's --

17 Q That looks like a CC?

18 A CC seems like. I don't know what it is.

19 Q Does that have any meaning?

20 A Maybe DC.

21 Q D.C.? Do you know what that is a reference to?

22 A My guess is that these expenses that incurred by  
23 the reimbursement like for incurred by the IAP for the  
24 convention for those people. So we paid by the IAP

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1 itself. So we transfer from the convention to the IAP.  
2 That's the best I can think of.

3 Q All right. So in this instance, would the IAP  
4 be the IAP National or IAP Dallas?

5 A It could be either. I don't know. I don't  
6 remember.

7 Q You had testified about your understanding about  
8 the payments to AMELP, and you certainly are free to go  
9 through these records in Exhibit 8. I will tell you  
10 I've done that, and I show payments of \$5,000 each to  
11 AMELP in May '97, June '97, July '97, August '97, one  
12 payment early September '97, another 5,000 in late  
13 September '97 all in the amount of \$5,000. And I'm  
14 wondering if you're able to tell me why it is that these  
15 regular payments of \$5,000 were being made to AMELP in  
16 1997?

17 A That could be, like I said, one of the things  
18 that either donations that came to us or sometimes we  
19 made donations also to them if they needed some money  
20 like we did other donations to, you know, to other  
21 organizations, even police organizations sometimes we do  
22 to them if they call us and fire departments, you know,  
23 and so forth.

24 So that could be the combination of both or it

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1 could be like -- I cannot recall exactly which is what,  
2 but we usually even, you know, some donations like I  
3 said for bookkeeping purposes and easier for us, we  
4 collected maybe this amount, we think it's worth  
5 transferring, it looks good, something like that it  
6 could be.

7 Q Okay. But it's your recollection that in  
8 addition to forwarding donations originally directed to  
9 AMELP, there were times when AMS may have made its own  
10 donations to AMELP to provide it with additional  
11 support?

12 A Sure. Or they may have incurred sometimes could  
13 be some expenses on our behalf. Like I say, if they  
14 helped us in putting together a festivity or something  
15 like that, that's like donation or a fee you consider  
16 whatever.

17 Q Okay. Would you please turn to Page 3090 of  
18 this exhibit. There's a check in the lower right-hand  
19 corner, and it's made out to AIV in the amount of  
20 \$1,000, can you tell me what AIV is?

21 A Arabic TV.

22 Q And that's a separate corporation from --  
23 unaffiliated with IAP?

24 A Yes, separate corporation.

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Q In the upper left-hand corner there's a check made payable from the IAP convention account to IAP, and there's a note in that memo column. Can you read that?

A It looks like Salah.

Q Do you have any understanding what that's a reference to?

A No, I don't remember. That could be the convention, my guess would be probably for those people who worked at the convention like baby-sitting or taking care of the schools or the children or the youth. So we hire them, and we pay them probably reimbursed, maybe IAP paid the check to this woman which is not supposed to be paid from the convention. So it's a reimbursement in this case. That's my best guess.

Q Okay. Now, I've gone through and tried to match up these checks and the transaction record that's Exhibit 8, and it appears to me at least that there are some checks that are not recorded on that transaction record. Do you know why that would be?

A Because the IAP, the convention would be separate record. They would keep separate accounting, because they are two separate accounts. Are you talking about the IAP convention? It should be.

Q If you take a look again at Exhibit 8,

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refreshing your recollection what we already covered in the last session, there are throughout Exhibit 8 a number of references under account, some of them say AM, but others say, CONN, and I think you had testified that that related to the convention account?

A Right.

Q Okay. So Exhibit 8 should contain records of both the convention account and the regular general AMS account, correct?

A That's -- your guess is as good as mine. Ask the guy when he did it, what he included, but that makes sense what you're saying.

Q Okay. Now, given that, let me ask you again, do you have any understanding as to why it is that some of the checks that are contained in the documents produced most recently are not reflected on Exhibit 8, the transaction report?

MR. FENNERIY: Could you show us which checks you're referring to?

MR. HOFFMAN: Q Sure. That one doesn't have a sticker on it. For example, on Page IAP 3070 of Group Exhibit 40, there is a Check No. 1130 which I have not been able to locate on Exhibit 8.

MR. FENNERIY: Which check are we at?

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MR. HOFFMAN: Q Check No. 1130 in the middle of the page on the right. Also on Page IAP 3078, there's a Check No. 1154, it's the only check on the page. Again, I don't see that anywhere.

A Talking about 1125, is that what you said?

Q No. 1130.

A 1130. Okay. I see.

MR. FENNERIY: You see that?

THE WITNESS: Yeah, I see.

MR. HOFFMAN: Q And 1154. Also on Page 3111 of Exhibit 40, there's Check No. 1364? On Page 3117 of Exhibit 40, there's Check No. 1318?

A Take them one at a time.

Q Okay.

A I'm not keeping up with you. Let's see. You said 1130. This is 1-6-98 IAP convention. Exhibit 8 that only contains the IAP general. I don't see anything containing the convention.

Q Let's take a look at that. Exhibit 8, if you look at, I'll give you an example, Page 2464 has several checks. Probably roughly half of the checks on the page make reference to CONN account. And you can go throughout this report if you look at Page 2457, the majority of the --

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A 2464, which are you talking about reference to conventions?

Q Well, the fourth item down on the page under account CONN, and if you look down in that column, there are a series of references to CONN under the name of the account, and in your prior testimony, you had indicated that that was a reference to the convention account?

A That's not checks. These are cash paid. That's why I don't see any numbers of the convention. With the conventions, a lot of things we do with these things because people take a taxi or go print something or copy, you know, something, it's all done with cash. He's not going to give checks to, you know.

Q Mr. Jaber, look under December 27th of '01. There are a series of entries there under account CONN all of which have numbers. Same page you're on, 2464?

A Okay.

Q 12-27-01 CONN, and they all have numbers, 1366, 1367 and so on. Now, it's not your testimony, sir, that those are not checks, is it?

A I got to look it up there what he's talking, because I really don't know. I can't answer, because here that should not -- unless he started doing this later on, but you can ask him, because he would have the

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1 answer and tell you what it is.

2 Q And him would be who?

3 A Abdel Based. Actually I don't think he was even  
4 there in 1996. Is this 1996? This is a December date.  
5 He should be there, yes. He would know.

6 Q So is it now your testimony, sir, that you're  
7 not sure whether or not the convention account is  
8 reflected on Exhibit No. 8?

9 A I don't know. I never said, but I'm saying  
10 convention when it says CONV, it means convention. This  
11 I know for sure. But whether these accounts included in  
12 this statement would be any of the checks, the  
13 convention would be included in this statement, that I  
14 cannot tell, okay. But my guess, only just a guess,  
15 they should be, you know, the convention has separate  
16 account. It should be separate. If he put it in here,  
17 I don't know.

18 Q See if we can take this out of the realm of  
19 guesswork.

20 MR. FENNERTY: Rick, before you go on, you left off  
21 on Exhibit 8, 3117, which you said checks weren't  
22 listed, and I don't think you finished. I think there's  
23 seven more pages. Were there more pages where the  
24 checks were?

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1 MR. HOFFMAN: This is not all the pages with checks.  
2 This is a collection of some of the pages that were  
3 produced that had checks.

4 MR. FENNERTY: All right.

5 MR. HOFFMAN: That's it.

6 MR. FENNERTY: But on this exhibit, you started  
7 naming all the ones that weren't listed on these balance  
8 sheets, and you ended at 3117.

9 MR. HOFFMAN: The check numbers that I have  
10 identified are 1130, 1154, 1364, 1318, 1320 and 1321.

11 MR. FENNERTY: Thank you.

12 THE WITNESS: 1320 you said the last one?

13 MR. HOFFMAN: 1321 is the last one.

14 MR. FENNERTY: 1320 and 1321.

15 THE WITNESS: 1320 and 1321.

16 MR. HOFFMAN: Q All right. Let's do this. Would  
17 you look at Exhibit 40, Page 3106. All right. There is  
18 a check on the right-hand side there, Check No. 1355,  
19 would you agree with me, sir, that that is from the IAP  
20 convention account?

21 A Yes.

22 Q Now, it's a check made payable to it looks like  
23 MI, Islamic Association for Palestine, would you agree  
24 with that?

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1 A Yes.

2 Q Your signature, correct?

3 A Yes.

4 Q And that would be the payee is the -- would that  
5 be the Michigan chapter of IAP?

6 A Probably, that's possible, yes.

7 Q As you sit here today, do you know why this  
8 payment was made to the Michigan chapter of IAP?

9 A Oh, yeah, we did. We tried to establish  
10 actually a chapter. They wanted to start receive money  
11 to rent an office and to, you know, build whatever  
12 needed to pay for the rent and for the telephone and  
13 whatever needed for an office. And we gave them that  
14 \$5,000 cede money. Actually we asking them further to  
15 give it back. They spend it, because the office never  
16 really took what it was supposed to do. But I remember  
17 that very well.

18 Q Now, this check is in the amount of \$5,000,  
19 correct?

20 A Right. Yes.

21 Q Now, turn to Exhibit 8, Page IAP 2462, and if  
22 you look about now an inch and a half up from the bottom  
23 of the page there is on the date 7-19-01, there is an  
24 entry, do you see that?

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1 A Okay.

2 Q And it's under account it says CONV, Check No.  
3 is 1355?

4 A Right.

5 Q Michigan ILSA, and then it trails off in the  
6 amount of \$5,000?

7 A Right.

8 Q Would you agree with me, sir, that that entry  
9 corresponds to the check that we just looked at, Check  
10 No. 1355 on the IAP convention account?

11 A Yes.

12 Q Okay. And that would suggest to you, would it  
13 not, that the IAP convention account is in fact included  
14 in the transaction report that is Exhibit 8, correct?

15 A That's a good conclusion, yes.

16 Q Okay. Now, since we've reached agreement on  
17 that, let me go back again and ask you whether you have  
18 any understanding as to why certain checks that are  
19 included in Exhibit 40 might not be reflected on the  
20 transaction report that is Exhibit 8?

21 A Again, like I said, I have to ask him, but my  
22 guess it seems like there's a pattern here. See all the  
23 checks that you mentioned that they're all paid IAP, the  
24 national obviously or the transferred to it. Maybe he

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1 for some reason, because this is not expense to him,  
2 because that's transferred money from one to another,  
3 maybe he took it there is no need to document it or put  
4 it in here.

5 That's just my guess about, you know, kind of  
6 procedure that he's probably following in his own mind  
7 that he felt there is no need. Because I looked at all  
8 these here all payable to IAP, which means the transfer  
9 of money specifically. It's not expense outside the  
10 office, like transfer one account to another.

11 Q And are you aware of any other types of  
12 transactions that might have been left off of the  
13 transaction report that's Exhibit 8?

14 A Not really. I don't have any idea why even  
15 these should be there, but like I said, knowing him, my  
16 guess he thought this would be the right, you know, not  
17 an expense. So it doesn't need to go on the account or  
18 the transaction report. Because all of them for IAP,  
19 nothing else, at least from what you have mentioned is  
20 not recorded, except those are payable directly from  
21 which is transfer. Actually it's not payable. It's a  
22 transfer. He considers it as a transfer from one  
23 account to another. So it's an interior thing that has  
24 nothing to do with expenses.

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1 Q All right. Let me ask you about a couple more  
2 questions about Exhibit 40, and maybe we'll take a short  
3 break if that's okay or even a lunch break. We're  
4 around that time so.

5 First of all, would you turn to Page IAP 3105.  
6 There is a check there, \$40,000 check from the IAP  
7 convention account to AMS/IAP, is this another example  
8 of clearing out the convention account?

9 A Yes.

10 Q I'm just curious as to why that transaction took  
11 place in June of 2001 when the conventions are in  
12 December, do you have an understanding?

13 A Well, there is no special reason except when we  
14 needed money, we transferred, because it's both our  
15 pockets, just take it from one pocket to another.

16 Q Now, in looking through Exhibit 8, which lists  
17 these checks in chronological order, in some instances,  
18 the numbers are out of order, are you able to tell me  
19 whether that is because checks were cut out of order or  
20 is the date reflecting when checks cleared?

21 A Would you give me an example?

22 Q Yeah. If you look on Exhibit 8, let's take  
23 Page 2453, and are you there?

24 A Yes.

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1 Q The entries on December 28th of 1997, 1103,  
2 1092, 1091, 1094, I think we can agree that's not in  
3 numerical order?

4 A Right, they are not.

5 Q What I'm trying to determine is whether that's  
6 because this report reflects dates that checks cleared  
7 or whether checks were cut out of order?

8 A No. What reflects because the IAP account  
9 checks we write to the people, okay. I kept the records  
10 of that, I mean the checkbook. So what he does, he  
11 takes it from the bank account. So when it comes on the  
12 bank statement, he puts it in there and obviously don't  
13 all come in order. Some people hold the check for a  
14 month, some people actually held it for two, three  
15 months and so on and so forth.

16 Q Okay. Let me ask you -- one more document I  
17 want to ask you about before we break here.

18 (Document marked as Exhibit No. 41 for ID.)

19 MR. HOFFMAN: Q All right. Mr. Jaber, you've been  
20 handed what's been marked as Exhibit 41. This is  
21 another list or copies of some of the additional checks  
22 that were produced. If you take a look on the  
23 right-hand side, the second check from the bottom,  
24 Check No. 1184 on the AMS account, correct?

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1 A Hm-hm.

2 Q You have to say yes?

3 A Yes. I'm sorry.

4 Q And that's your signature on the check, correct?

5 A Yes.

6 Q Now, the check is payable to CAIR, do you see  
7 that?

8 A Yes.

9 Q And there is a reference in the memo, are you  
10 able to tell me what this check was for?

11 A This is I think CAIR, my recollection, they put  
12 together an event with other organizations including our  
13 organization which is media, you know, exposition or  
14 something like that in Michigan. So this is our share  
15 of the expenses that we paid to CAIR for putting it all  
16 together.

17 Q Other than this 2001 media exposition, are there  
18 any other events that IAP or AMS have put on along with  
19 CAIR, co-sponsored or --

20 A I don't remember. I don't even remember this  
21 except until I read it now.

22 Q Can you tell me what the nature or purpose of  
23 the particular event that's referenced in the memo of  
24 this check was, can you explain to me what that was?

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1 A I don't know the detail, but to the best of my  
2 recollection that that's like putting together a  
3 workshop, media, how to work with the media, how to, you  
4 know, to deal with the media and so on and so forth,  
5 because they are expert on that, and they put that  
6 together.

7 Q And that was in Michigan?

8 A Michigan I think to my recollection. That's  
9 what it says in Michigan, I assume.

10 Q Now, was this a local event, and by that I mean  
11 was it only local organizations that attended that or  
12 was this bringing in organizations in people from around  
13 the country?

14 A I don't remember.

15 Q Let me go off the record.

16 THE VIDEOGRAPHER: Going off the record at  
17 11:59 a.m.

18 (Whereupon, a brief recess was taken.)

19 THE VIDEOGRAPHER: Going back on the record at  
20 12:06 p.m. Please proceed.

21 MR. HOFFMAN: Q Okay. Mr. Jaber, I want to go back  
22 and clarify a couple of things you had testified about  
23 last time. We talked quite a bit about the concept of  
24 this IAP National, and I think you had testified that

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1 prior to AMS serving as the national office if you will  
2 for IAP, that the national office was down in Dallas,  
3 correct?

4 A Yes.

5 Q Now, was that the IAP Dallas office or the AMELP  
6 office?

7 A I would assume that, you know, that would be the  
8 IAP Dallas office.

9 Q When you say assume, you don't have a firm  
10 understanding?

11 A That's my understanding that the IAP Dallas. I  
12 don't even know that ever was part of the IAP, you know,  
13 whatever.

14 Q Now, you had testified earlier that when the  
15 national office was transferred up to Chicago from  
16 Dallas that there were funds that were also transferred  
17 up there to go along with the national operation,  
18 correct?

19 A Very small fund, I remember probably list 5,000  
20 or less.

21 Q Do you recall where those funds were transferred  
22 from, was it IAP Dallas or AMELP?

23 A IAP Dallas.

24 Q Now, you testified previously, I had asked you

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1 whether you knew anything about IAP Dallas' relationship  
2 with any of the other defendants in this action, and  
3 your response was that you didn't know the details. My  
4 question is do you have any general understanding as to  
5 what relationship, if any, IAP Dallas had with any of  
6 the other defendants in this action?

7 A You talking about the QLI and HLF and --

8 Q UASR.

9 A UASR?

10 Q Yes.

11 A I don't think they have anything in particular  
12 to the best of my knowledge except like any other  
13 organization, the work, you know, they might meet across  
14 some points, and sometimes they might defer.

15 Q How is it that AMS came to be a part of IAP  
16 National?

17 A Well, you know, we asked. We wanted to be part  
18 of the IAP National, because we have just about the same  
19 goals and mission.

20 Q When you say that we asked them, who is them?

21 A The IAP National.

22 Q Who in particular did you talk to at IAP  
23 National about having AMS be a part of that  
24 organization?

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1 A Well, Osama Ahmad, he was the president.

2 Q Do you recall when that conversation took place?

3 A No, I don't remember.

4 Q What year?

5 A It has to be somewhere before we became IAP  
6 National.

7 Q Okay. You became IAP National in '96?

8 A So it has to be sometime by that time or before  
9 it.

10 Q Now, in 1993 when the corporation was initially  
11 formed, was it part of the IAP National?

12 A It was separate entity. It has its own board.  
13 It has its own functions and meetings and whatever,  
14 their accounts, and everything is separate.

15 Q All right. So prior to 1996, did you have any  
16 involvement with IAP National?

17 A Well, we have involvement with all kind of  
18 organization that we work on the same cause, yes.  
19 Sometimes, like I said, we cross paths, and sometimes we  
20 do things on our own.

21 Q I think you had testified earlier, and referring  
22 to Page 9 of your prior testimony, also Page 225 that  
23 you didn't have any knowledge of IAP nationally prior to  
24 1996 of their operations, is that correct?

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1 A Well, specifically what I said, I remember from  
2 my recollection, I didn't have anything personally to do  
3 with the national office, with their operation, their  
4 meetings, their board, because before that I did not  
5 have any direct input to the IAP National.

6 Q Did you have any involvement with IAP prior to  
7 1996?

8 A National?

9 Q Any IAP, any entity known as IAP other than AMS?

10 A I don't remember in particular if there is any  
11 particular thing. I don't remember any. Like I said,  
12 sir, whatever we work with other organization, if that's  
13 something that like help us some information or exchange  
14 information and stuff like that.

15 Q Was the AMS did it serve -- prior to its  
16 incorporation, was that a chapter of IAP National?

17 A Yes, we change to become a chapter IAP Chicago,  
18 yes.

19 Q Okay. When did that effort first start?

20 A Probably a year later or something. I don't  
21 remember.

22 Q A year later from when, after the formation of  
23 AMS?

24 A Yes.

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1 Q Okay. Were you involved with any local chapter  
2 of IAP prior to your formation of AMS?

3 A I didn't know if there was a chapter  
4 specifically for IAP. I'm not aware there was one.

5 Q Now, you testified earlier also that you have  
6 been involved over the years with the Mosque Foundation,  
7 correct?

8 A Yes.

9 Q How long have you been involved with that  
10 entity?

11 A Since its inception.

12 Q Which is when?

13 A 1980. Yeah, probably the 70's actually when I  
14 was involved in raising funds to build it, yes, before  
15 it was built. The IAP, just to clarify one thing, the  
16 inception of the Mosque Foundation was four years old  
17 actually when I go back. The Mosque Foundation was to  
18 my knowledge, I think, was formed in 1954. So I was not  
19 old enough even to be part of it. So to correct that.

20 (Document marked as Exhibit 42 for ID.)

21 Q Now, Mr. Jaber, you've been handed what's been  
22 marked as Exhibit 42. It's a document that on its face  
23 purports to be entitled the Islamic Post from the Mosque  
24 Foundation of Chicago. That's the Mosque Foundation

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1 that you're involved with, correct?

2 A Yes.

3 Q And have been since at least the 1980's?

4 A Yes.

5 Q It's dated November 1991, do you see that on the  
6 upper left?

7 A Yes, I see.

8 Q All right. You were involved with the Mosque  
9 Foundation in 1991, correct?

10 A Yes.

11 Q Is this a copy of a newsletter that was put  
12 together by the Mosque Foundation?

13 A It looks like it.

14 Q Would you turn to the second page, please. At  
15 the bottom there is an article or a section entitled  
16 anniversary gathering for the Intifada at Bogan High  
17 School, Sunday 17, November. Do you see that?

18 A Yes.

19 Q And it starts off by saying that Muslims will be  
20 focusing on the Intifada and the Islamic position for  
21 genuine peace in Palestine in light of the Madrid  
22 conference during the Fifth Anniversary Celebration of  
23 the Intifada. Now, the Madrid conference, do you  
24 understand what that's a reference to?

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1 A Yes.

2 Q What's your understanding?

3 A Well, that's gathered by President Bush, Senior  
4 that trying to put together a peace process which is  
5 after that the Alsa agreement, but that's when it  
6 started the process after the second Golf War that  
7 President Bush tried to make peace in the Middle East.

8 Q Okay. Now, skipping down to -- skipping over to  
9 the next paragraph there's a paragraph that reads  
10 jointly sponsored by the Islamic Association for  
11 Palestine, IAP, and the Mosque Foundation, the event is  
12 expected to draw about 1,500 supporters. Now, are you  
13 aware of any activities of the IAP in November of 1991?

14 A The IAP, the national, they put, you know, like  
15 every year from -- I think from the 1980's, late 80's  
16 from Intifada that put on these kind of can call  
17 celebration or gathering certain times. That's usually  
18 at the anniversary of the Intifada.

19 Q Okay.

20 A And people usually got to work on that.

21 Q All right. And you were aware of these annual  
22 events that were put on by the IAP on the anniversary of  
23 the Intifada going back to the late 80's?

24 A Yes, I was.

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Q If you look down at the next paragraph, it says this is a celebration of the fruits of the Intifada to stress the idea that Palestine is an Islamic cause especially in this time of the conference on the Middle East. And it's quoting you as president of IAP's Chicago chapter. Do you see that?

A I see it.

Q And in fact were you in November of 1991 the president of the Chicago chapter of IAP?

A There was no chapter. This is, like I said, these are committees. At the time we need to put something together, the committee gathers, okay. Let's say they want to put this, which is like for this instance or before it or after it, they put the committee on.

I chaired the committee, but maybe the people they call it chapter, sometimes maybe they call it whatever they want to, but particularly it's not the chapter that's formed or existed or has this kind of chapter, my knowledge this is my definition of a chapter, just a committee.

Q So --

A When the event is gone, you know, they work event by event. People change. People come and go from

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these committees.

Q So this was a committee, though, that was working with IAP National in connection with this particular event, correct?

A Right.

Q And you were the head of that committee in 1991?

A Yes.

Q Do you have any understanding as to how the Mosque Foundation in which you were actively involved would have come to characterize your position as being the president of IAP Chicago chapter?

A Probably whoever wrote it, that's his, you know, conclusion. That's his understanding or that's the way he wants to define it. That's something that has to be referred to whoever wrote the article.

Q Would it be fair to say, though, sir, that at least in November of 1991, you were actively involved in this committee that was working with IAP to sponsor this event?

A Yes, its committee.

Q Were you involved in any other IAP events during this time frame?

A If there they put together an event, and they ask me would you like to chair the committee, I would.

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Q Okay. So there are other committees that you were involved with for IAP National relating to other events?

A Possible, yes. I don't remember, but that's possible if they ever ask me to do like they did in this one and the ones before, I would do it, yes. And I would do it again.

Q Now did you -- you've mentioned that these were annual conferences, the annual events on the anniversary of the Intifada. Were you involved in planning or organizing with IAP any of the events in earlier years prior to 1991?

A Yes, I said from the late, I think, '88 or '89 or something like that. I remember they asked if I was part of the committee. It was like committee, temporary committee, usually like when they gather they says, okay, you lead it, and somebody leads it.

Q Okay. So from 1988 forward, each year during this annual event celebrating the anniversary of the Intifada, you would be involved in the committee that was working with IAP National to set up this program?

A Yes.

Q And you may well have also been involved in other committees for IAP working on IAP National events

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during that time frame as well, correct?

A I don't remember, but if there was, they ask me, like I said, to help out, I would help out, because I believed in the cause, and I still do. It has not changed.

Q During that same time frame, did you attend any other IAP conventions or events that they sponsored, late 80's, early 1990's?

A I don't remember if they sponsored any conventions in particular, but I would go to conventions all the time whenever there's conventions or Islamic conventions. The only thing I remember like I went to MAYA conventions and ISNA conventions. I attend a lot of conventions.

Q Okay. When you were involved in working on this Fifth Anniversary Celebration of the Intifada, who at IAP National did you deal with?

A I think I remember the president then, I don't know if it was Omar Ahmad or Jasser Bushnaq, one of them.

Q In any of the prior years when you were dealing with IAP National in connection with these annual celebrations, who did you deal with at IAP National?

A Like I said, you know, the president at one

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1 point was Jasser Bushnaq or Omar Ahmad.

2 Q Did you ever have dealings with anyone at IAP  
3 National other than the president, whoever it may have  
4 been at any given time?

5 A Not that I recall.

6 Q Now, if you'd look farther down towards the  
7 bottom of the right-hand column, five lines up from the  
8 bottom, there's a sentence that says that proceeds will  
9 go to the Occupied Land Fund to help Palestinians who  
10 have been victimized by oppression. Last year's event  
11 netted about \$60,000. Do you see that?

12 A Yes, I see.

13 Q The Occupied Land Fund, that is today what is  
14 know as the Holy Land Foundation?

15 A Yes.

16 Q Do you know how it is that it came about that  
17 Occupied Land Fund was chosen to be the recipient of the  
18 proceeds of this event?

19 A That's the business of the IAP National. I have  
20 nothing to do with choose or not to choose. I had no  
21 say in that.

22 Q That was not something that was decided at your  
23 level, it was an IAP National decision?

24 A Yes.

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1 Q It makes reference to the prior event netting  
2 about \$60,000, do you know whether that money was also  
3 donated to the Occupied Land Fund?

4 A I would assume. If that's what they said -- if  
5 that's way they say, that's what they say. But I don't  
6 have a trace of the money. When it's collected, it's  
7 collected. It goes to the Holy Land Foundation.  
8 Whether after that or before that like when we dealt  
9 with them, it goes to them. What they do with it and  
10 how it goes after that, we have no control or even a say  
11 in it.

12 We just a committee that work together, put the  
13 things together, get the, you know, the place rented  
14 and, you know, sell the tickets, encourage people,  
15 distribute flyers and so forth.

16 Q Do you know how much money was raised at the  
17 event that's referenced here, this Fifth Anniversary  
18 celebration?

19 A No, I don't remember.

20 Q Now, you talked about a chapter of IAP National  
21 and your understanding of what is and is not a chapter.  
22 Can you explain to me how you -- what you understand to  
23 be a chapter and why you believe that these committees  
24 you were working on were not a chapter?

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1 A My understanding of chapter which I said before  
2 that usually the IAP works and we work with people that  
3 when we need to put on an event in any city, we just  
4 form a committee. Sometime they call themselves  
5 chapters. They call themselves whatever they want to  
6 call themselves. Usually we don't get involved in, you  
7 know.

8 But the chapter mean it's affiliated, has tax  
9 number, it has board, it has meetings, they keep minutes  
10 and so on and so forth. Committees for an event, they  
11 don't keep those things. If they keep anything,  
12 probably keep temporary until they're finished with it,  
13 then they throw it away, because it's not an entity --  
14 official entity. Chapter is an official entity.  
15 Committee is just a committee. Works for certain events  
16 for the particular time and particular place, and when  
17 it's done, it's dissolved.

18 Q In your experience throughout the history of IAP  
19 National including the time that you've been the  
20 president, have the chapters, what have been referred to  
21 as chapters in the documents we've seen, have they  
22 always been entities, corporations or some other legal  
23 entity?

24 A Well, that's the way it should be. If they are

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1 referred to sometimes like I said, because the committee  
2 would like to be called a chapter. That I don't know.  
3 I don't remember. But my definition of a chapter,  
4 again, that would be an official entity with a tax  
5 number and so forth. Like the chapter -- like we  
6 considered Dallas a chapter. Chicago is a chapter. At  
7 one point we had, you know, the New Jersey, they were  
8 organized in the state of law that they wanted to become  
9 a chapter. We tried to establish a chapter in Michigan.  
10 That's why we paid the money we referred to earlier.

11 But other than that, there's always committees.  
12 They call themselves chapters sometimes whether  
13 North Carolina or could be in Milwaukee. It could be in  
14 any other place.

15 But, you know, they call themselves chapter  
16 either because usually the same people work out, you  
17 know, these events when we ask them or the same contacts  
18 or because it's more prestigious probably for them to  
19 call themselves chapters.

20 Q Just to clarify then, I know you had talked  
21 about the late 80's, can you tell me when the first time  
22 that you recall being involved in a committee for or  
23 working with IAP National?

24 A Late 80's.

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Q Would that have been in connection with one of these annual Intifada celebrations or some other event?

A Most likely, yes.

Q The annual Intifada celebration?

A Yes.

Q We're talking about the first one would have been -- the first anniversary would have been in '87?

A No. It started in '87. So the first anniversary would be '88.

Q '88. Okay. Now, I take it that the activities that you've been describing, these committees, at no time prior to the formation of AMS were any of these activities that you were involved in part of a legal entity?

A No, no, not before that. That's why I wanted to establish AMS, because if you wanted to function, they become regular, they says make it official, make it a chapter. We have everything documented. We have control over these things. We don't want to be an entity just -- I mean a committee that just comes.

Q In forming AMS, you had years of experience in dealing with IAP National at various events, correct?

A I don't know if you call it experience. Yes, I had contacts.

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Q You had worked on events with them since 1988, correct?

A Right. I don't know if '88 or '89. So I don't remember, but I know, you know, late 80's we started working with them, but to very limited work or activities.

Q And I take it that in 1993, when you formed AMS, it was part of a decision that you wanted to have something that was more structured and ongoing, an ongoing entity that would act as part of IAP, correct?

A Yes. Yes.

Q Were the members of the committee that you worked on, were those all local people?

A Yes.

Q Do you recall typically how many people would have been on these various committees working on the annual Intifada celebration?

A Could be sometimes from 3 to sometimes we have 50 people. Depends on the people, who wants to come in. Open, it was open meetings, open committees. Those who were willing to work and want to help, they volunteer. Some they come the first meeting, some they come two meetings. Like I said, it's not something organized structure. That's why I would not call it as a chapter.

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Q Did any of the people who ultimately ended up becoming officers or employees of AMS get involved in those earlier committees?

A Most likely.

Q For example, Sabri Samirah?

A Yes.

Q He was involved in the committees earlier?

A Right.

Q As you sit here today, you don't recall, though, any other specific events or activities that you may have been involved in committees with prior to the formation of AMS other than these Intifada celebrations?

A I don't remember anything in particular.

Q Do you know were there committees similar to yours that were set up in other cities to work on these annual events?

A I would assume so.

Q Do you know one way or the other?

A No, I don't know for sure, but I assume they work the same way.

Q This particular event that is referenced in Exhibit No. 42, where was it held?

A I think in Bogan High School.

Q Which is where?

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A That's in Chicago.

Q Were these annual celebrations, were they a national celebration or smaller celebrations held around the country?

A I think several celebrations in each country. Each city has different date, probably different time. Depends on the city, I assume.

Q So you would be working -- this Chicago committee was working to organize an event to be held in Chicago with Chicago area people attending, and then there may have been others around in other cities?

A Yes. I'm not aware of it. I don't know about other stuff, but I know about Chicago. We did that, yes.

Q We're sort of approaching a tape limit here. Let me just ask you are you -- this document we talked about as a Mosque Foundation document, are you aware of any relationship which the Mosque Foundation had with the Holy Land Foundation?

A There's no official relationship with the Mosque Foundation or any other organization to my knowledge since I was involved with. The only thing that we work with all kind of organizations. They come from all over the country for fund raising, for different various

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goals and for various reasons. The Mosque Foundation always open its door to help out people everywhere, but there's no official relationship with any of them.

Q All right. Has the Mosque Foundation had any unofficial relationship with the Holy Land Foundation that you're aware of?

A Depends what the definition of unofficial. Define it to me. Then I can tell you.

Q You're the one who used the term official.

A You have some relation that's growing, communication and so forth. Is it unofficial to talk to somebody on the street, call it unofficial or official. If we agree on the definition, then I can tell you.

Q Are you aware of any situation in which the Mosque Foundation was involved in any programs sponsored by the Holy Land Foundation?

A It's not sponsored, because the Mosque Foundation does not sponsor Mosque Foundation's policy since I was on the board. Our policy, we open our doors for all legitimate organizations that do good work and cause that we think it's good, and we think it's worth opening for. So we open the doors, and they come in, and we'll help them out. They put their flyers. We'll announce it, and, you know, the prayers and so on and so

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forth.

Q So, for example, would there have been solicitations for donations to the Holy Land Foundation at various times at the Mosque Foundation?

A Oh, yes. Many times.

Q So when you're differentiating between official and unofficial here, by that do you mean that there's no official agreement by which the Mosque Foundation will formerly go out and undertake particular efforts for the Holy Land Foundation?

A No, there's no agreement whatsoever to my knowledge about between the Mosque Foundation or any other organization for that matter.

Q But there may have been any number of circumstances, in fact there were a number of circumstances in which the Mosque Foundation undertook announcements or other efforts that were helpful to the Holy Land Foundation and its mission?

A That's the Holy Land Foundation. Like I said, all different organizations. It could be hundreds of them over the years.

Q IAP for example?

A IAP for example, yes.

Q Okay. So that was another situation where the

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Mosque Foundation may have provided assistance to IAP in terms of announcements or solicitations over the course of the years?

A Yes.

Q Why don't we break for lunch.

MR. FENNER: How long?

MR. HOFFMAN: How long to go, how long to break for lunch? About 45 minutes.

THE VIDEOGRAPHER: Going off the record at 12:34 p.m.

(Whereupon, a recess was taken.)

THE VIDEOGRAPHER: Going back on the record at 1:21 p.m. at the beginning of Tape 2 in the deposition of Rafeeq Jaber. Please proceed.

MR. HOFFMAN: Q Mr. Jaber, how did your affiliation with IAP National first come about?

A Well, like I said, you know, talking about the AMS or are you talking about me personally?

Q No, you personally?

A That's when we founded the AMS do a lot of things together, projects, the same mission, the same cause. So it doesn't make sense to stay separate. I said we should be part of IAP National.

Q Well, let's go back. You actually had

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involvement with IAP National before AMS was formed, we talked about that before lunch, correct?

A Concerning the making some activities only.

Q Right. You were involved in committees working with IAP National on various events, correct?

A Yes.

Q Okay. How did that affiliation begin?

A I think very simple as a Palestinian American, was born and raised in Palestine and who suffered the brutal occupation of Israel and his family suffered and still suffering. It's very natural for me to come to that cause and try to help -- try as much as possible hopefully that we will alleviate that cause or at least to prevent that cause to the American public.

Q All right. So you took steps to become involved with IAP National, correct?

A I don't know how the steps are taken, but I'm against the occupation since it came about in 1967. So it's not something with the IAP. I'm a free man. I believe in freedom, and I don't believe in occupation. So it's very simple and very natural for me to come and work with organizations who would share that view with me.

Q Okay. What I'm trying to figure out is I'm not

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1 asking you about the IAP's mission that led you to  
2 become involved, I'm trying to figure out did you  
3 contact somebody, did you -- how was it you actually got  
4 involved with the organization?

5 A I don't really remember exactly I mean what  
6 exactly took place. The specifics, I don't remember.  
7 But like I said, you know, I'm known. I was always  
8 against the occupation. Technically I was expelled  
9 from, you know, Israel. So obviously -- something how  
10 it came about, I don't know.

11 Q So you don't recall whether you were contacted  
12 by somebody else or whether you sought out IAP National  
13 to get involved with these committees or how that came  
14 about?

15 A I don't remember the specifics.

16 Q And then just for clarification, you had  
17 testified about how IAP National and AMS were  
18 affiliated, but if I understood your testimony before  
19 lunch, part of the reason you formed AMS was to give a  
20 more concrete and permanent if you will organization to  
21 the activities that you were doing associated with IAP  
22 National, correct?

23 A Yes. You can raise funds for the organization,  
24 becomes legal, you know, entity that you can open

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1 accounts. All these things needed in order to be able  
2 to function as an organization. You have to have an  
3 account. You have to have tax I.D. number and so forth  
4 and so on. So we needed to make it real official way  
5 and the legal way.

6 Q Okay. But you've in forming AMS, it was always  
7 expected that you would be in some fashion working with  
8 or affiliated with IAP National?

9 A Yeah, we would be working, yes, with the IAP  
10 National, yes, or any other organization for that  
11 matter, not just IAP National.

12 Q We talked a little bit before lunch about  
13 whether or not you were involved in another activities  
14 with IAP National during the late 80's and early 90's  
15 other than these early annual Intifada celebrations. I  
16 have a little different question this time. Regardless  
17 of whether you were involved in it, do you know what  
18 other activities IAP National engaged in during that  
19 time period?

20 A I don't remember what they are. Like I said, I  
21 was not an official with them. I was not part of them.  
22 So I don't keep up with their schedules, what they do or  
23 what they do not do.

24 Q Was there to your knowledge ever any sort of an

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1 effort by IAP National to get the various people they  
2 were working with in different communities be they  
3 called chapters or something less formal to create  
4 corporate entities to affiliate with IAP National?

5 A That you can ask them that question, because I  
6 don't know if they did or did not. I have no idea.

7 Q Well, do you know whether -- was AMS ever part  
8 of any such program to try and get corporations formed  
9 around the country or was that something you did  
10 independently?

11 A No. We formed the committee that we need to do  
12 something probably and document it, like I said, have  
13 accounts and tax I.D. numbers and so forth so everything  
14 would be accounted for.

15 Q Okay.

16 A So I took the initiative, and I said we need to  
17 do that.

18 Q All right. So the -- but the initiative in  
19 terms of forming AMS, that was your initiative and not  
20 some request or directive that came from IAP National to  
21 start incorporating?

22 A Well, maybe when we met, we discussed this  
23 possibility or something. That could have happened.  
24 But I don't remember specifically like official request

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1 or something like that. Maybe we have talked about it  
2 like, you know, doing that, and I'm assuming that they  
3 would encourage something like that, because that's  
4 something that would help them out.

5 Q You testified a few minutes ago about some of  
6 your views about the occupation and how they relate to  
7 your involvement with IAP National, and what I wanted to  
8 ask you is what about IAP National in particular would  
9 lead you given your views and so on to join that  
10 organization as opposed to some other organization or  
11 staying unaffiliated?

12 A Well, like I said, the mission, their mission  
13 fits with what I think is right and good in defending  
14 the cause and trying to promote it and try to explain it  
15 to the public here, and that fits what I think.

16 Q And how would you define that mission?

17 A The mission to promote the Palestinian cause  
18 and, you know, and the information to put out for the  
19 public at large to understand the realities and what  
20 exactly goes on in Palestine posing what the Israeli  
21 point of view which is all lies and deception. We try  
22 to make that deception and lies clear to the people.

23 Q Were there any particular activities or events  
24 that IAP National engaged in that attracted you to that

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1 organization?

2 A Like I said, information that they are  
3 structured, that they have the publications that go out  
4 and the brochures, you know, the events, it seems makes  
5 a lot of sense to me or it made a lot of sense to me  
6 then, and it still does that this is the right way to go  
7 to defend this cause.

8 Q When you say publications, what publications are  
9 you referring to?

10 A Well, they put out publications, newsletters or  
11 brochures or flyers, Al-Zaytuna, you know, all these  
12 things that to me -- publish the World Monitor, Muslim  
13 World Monitor, very reason -- very good reasons to join.

14 Q Do you recall that during the years when you  
15 were working on these various Intifada Anniversary  
16 committees that IAP was publishing an Arabic newspaper  
17 known as Ilafilastine?

18 A I seen it in the magazine, but I don't know who  
19 published it.

20 Q You saw it during that time frame?

21 A I don't remember when, but I seen that, you  
22 know, probably a couple few times I seen it, you know,  
23 because every publication is everywhere. Just go to any  
24 Arabic store. You find all kind of publications. And I

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1 for one like to read, and I pick up everything I see  
2 there.

3 Q So you had seen Ilafilastine and have read it,  
4 but you didn't know specifically who it was that  
5 published it, is that fair?

6 A I didn't care really who published it. I was  
7 just reading information. A lot of publication I read,  
8 I don't care who published it.

9 Q I'm not asking you if you care. I'm just asking  
10 you if you knew?

11 A I don't remember, because I didn't care. So I  
12 don't know if I made the effort even to know who or did  
13 not.

14 Q When you first formed AMS, did you have any  
15 discussions with anybody at IAP National about the  
16 formation of the corporation and what it would be doing  
17 in connection with IAP National?

18 A Yeah, we talked to Omar Ahmad. Then he was the  
19 president. He encouraged that.

20 Q Do you recall anything more specific about what  
21 you discussed with Omar Ahmad?

22 A Would you help us, because he says, yeah, they  
23 would give us whatever help they can and to promote and  
24 to work with us.

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1 Q When you're talking about helping, you're  
2 talking about financial help?

3 A Whatever help they can. I said whatever help  
4 they can. I don't remember them giving us any cash. If  
5 they did, I don't remember it at least. But they said  
6 whatever they can, promote it, maybe put it in their  
7 publications, whatever it is, but they said they're  
8 willing to help.

9 Q Was there any discussion during that time frame  
10 when you were looking at forming AMS with Mr. Ahmad  
11 about what AMS might be able to do for IAP National to  
12 help its cause?

13 A Not in particular. We want to work for the  
14 cause, I mean the same cause, the same mission  
15 practically, you know, to try to help out in Chicago.  
16 Chicago is a very large community, Palestinian community  
17 specifically and Arab community and Muslim community and  
18 is very viable and needs somebody to work and inform  
19 them, because people, they looking for somebody to  
20 inform them what's going on in the old country.

21 Q As you sit here today, do you recall what other  
22 cities had sort of committees that worked on the annual  
23 Intifada celebrations besides Chicago?

24 A I heard of a lot of cities were working there.

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1 I don't know which one. Major cities, most of them  
2 probably were working there at that time, you know,  
3 Los Angeles, New Jersey, Dallas, all these major cities,  
4 they were having something very similar what we had.  
5 But I don't know if particular who did and what if it  
6 happened or if it did not happen. This I was not privy  
7 to, neither I cared to follow up on it what happened.

8 Q Did your committee in connection with the  
9 planning of these annual festivities ever have dealings  
10 with committees from other cities?

11 A No, not in particular I remember.

12 Q I wanted to follow up on something you testified  
13 about last time in your deposition on Page 115. I had  
14 asked you about whether you had ever heard of an IAP  
15 corporation being formed in California. Do you recall  
16 that?

17 A No, not specifically.

18 Q I'll read you the question and answer just to  
19 refresh your recollection starting on Page 115, Line 15.  
20 Do you have any knowledge or understanding of this  
21 incorporation of California of IAP, and this is  
22 referring to Exhibit 17 if you're interested, and you  
23 answered I don't recognize this document. I have never  
24 seen it before. And I'm not aware. I heard only in the

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1 news when things came out there was an IAP in  
2 California, do you recall that?

3 A Not specifically. I don't remember either the  
4 question.

5 MR. FENNERTY: Do you want to look at Exhibit 17?

6 MR. HOFFMAN: Q What I wanted to ask you about is  
7 you had made some reference to hearing news when things  
8 came out that there was an IAP in California, and I was  
9 wondering what news you had been referring to in your  
10 testimony?

11 A The people, when I took over people that will  
12 help out in Los Angeles. I never heard that is  
13 incorporation. As a matter of fact, I asked them when I  
14 took over if there is any organization officially there.  
15 They said no. I am not aware even still even though  
16 probably I looked last time. Still to me it's very  
17 strange that even there was an organization in  
18 California with the IAP.

19 Q Well, in your answer previously you had said  
20 something about you had heard only in the news, and I  
21 wasn't sure what news you're referring to.

22 A When people talk about.

23 Q Okay. So not like news as we typically think of  
24 it in terms of journalists reporting news?

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1 A No, not that kind of.

2 Q And this news that you heard about there being  
3 an IAP in California, when did you hear that?

4 A I don't remember.

5 Q Was it during your stint as president of IAP  
6 National?

7 A Well, when I came, the IAP National of course I  
8 inquired about, you know, where is this organization  
9 that they are incorporated. The only ones that I was  
10 aware of and still think that's the only ones that still  
11 exist that the IAP Chicago and the IAP Dallas, and there  
12 was committees in Los Angeles but not as corporation or  
13 anything like that.

14 (Document marked as Exhibit No. 43 for ID.)

15 MR. HOFFMAN: Q Mr. Jaber, you've been handed  
16 what's been marked as Deposition Exhibit 43. It's three  
17 pages, three separate documents as a group exhibit here.  
18 These are all documents that were, again, produced, the  
19 most recent batch of productions since your last  
20 deposition session.

21 Take as long as you'd like to look at these, but  
22 it would be fair to say that these are all documents  
23 generated by IAP National or AMS relating to efforts to  
24 assist the Holy Land Foundation in connection with

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1 government investigations or forfeitures?

2 A Okay.

3 Q Are these all documents generated by AMS or IAP  
4 National relating to efforts to rally support for the  
5 Holy Land Foundation after its assets were ceased?

6 A That's what it seems like, yes.

7 Q Whose idea was it to organize these efforts?

8 A Actually when that happened, I was out of  
9 country. I wasn't even here. But Sabri, says here  
10 Sabri Samirah.

11 Q In fact Mr. Samirah's name is up at the top as  
12 the contact person on Page 1, right?

13 A Right.

14 Q Do you know why it is that Mr. Samirah organized  
15 these efforts to rally support for the Holy Land  
16 Foundation?

17 A The question should be why they shouldn't,  
18 because we believed and still believe that the Holy Land  
19 Foundation is innocent to the charges or even there was  
20 no due process even to close it. So that was not  
21 something that should happen without due process and to  
22 prove that the HLF had anything to do with terrorism or  
23 something like that.

24 So it was in my opinion or in our opinion that

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1 arbitrary decision by President Bush, it's a political  
2 decision more or less than actually has anything to do  
3 with the laws or the securities of the United States.

4 Q Do you know whether there were any  
5 communications between IAP National or AMS on the one  
6 hand -- are you okay?

7 A I'm okay. It went to the wrong pipe.

8 Q Let me start over. Do you know whether there  
9 were any communications between your organization on the  
10 one hand and HLF principals or officers or directors on  
11 the other hand regarding these rallies?

12 A No. This is just something we initiated from  
13 what I understood from Sabri. Then he initiated in his  
14 own, which is natural reaction.

15 Q I wanted to go back and clarify something you  
16 had testified about last time. I had asked you whether  
17 you were aware of Mousa Abu Marzook ever having any  
18 relationship with IAP or AMS, and your response was not  
19 when I am in charge of it. He never had in any capacity  
20 whatsoever. And my only question to you then is are you  
21 aware of Abu Marzook having any affiliation with either  
22 IAP or AMS prior to your being in charge of IAP  
23 National?

24 A No, I didn't even know him until when it came

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1 out, and like I said, the news and they started saying  
2 Marzook have something to do originally with the IAP,  
3 original IAP or the HLF or whatever it is, just what  
4 I've read in, you know, and I heard after that came out  
5 to be public. But before that, I did not even know of  
6 Marzook. I still never met him in my life.

7 Q Okay. But I just wanted to make sure, because  
8 your testimony had been limited to since you've been in  
9 charge, but you're not aware of him being involved in  
10 IAP National or AMS before your involvement with IAP  
11 National either, are you?

12 A Actually I never even heard of him until the  
13 news came out that he's somebody with, you know, an  
14 official of Hamas. Then the news starts coming out that  
15 he had something to do with IAP or all these things.

16 Q Are you aware of any financial contributions  
17 that Mr. Abu Marzook made to IAP National or IAP or AMS,  
18 any of those entities?

19 A Not at the time what I read again for the news  
20 and, you know, the papers and so on.

21 Q No personal knowledge beyond what you read in  
22 the media?

23 A No.

24 Q During your last session of your deposition on

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1 Page 228 you testified that -- I had asked you the  
2 question is there any, for example, does the IAP support  
3 people regardless of whether it has information or  
4 belief as to their guilt or innocence in a particular  
5 matter. And your answer was, well, we believe everybody  
6 is innocent until proven guilty. So everybody is  
7 innocent. So we support all the innocent people. Once  
8 they are proven guilty, it's over. And I take it from  
9 that once they're proven guilty, then IAP doesn't  
10 support them any longer?

11 A No, we don't go after support, because the case  
12 is over with. So there's no need to go anywhere after  
13 that.

14 Q Okay. I just want to clarify what you mean by  
15 proven guilty, though. Now, for example, Mohammed Salah  
16 was convicted in Israel, as you recall, found guilty  
17 through a plea agreement, and yet we've seen  
18 documentation in which your organization continued to  
19 support him, correct?

20 A Yes.

21 Q So I take it that's not the kind of guilty plea  
22 that would cause you to stop supporting a particular  
23 individual?

24 A First of all, I do not recognize the Israeli

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1 courts as courts that would have any justice or to do  
2 justice ever with the Palestinians. So that's not  
3 part -- that's not part of the equation or the plea  
4 guilty. What I'm talking about if he's proven guilty  
5 that broke any United States laws.

6 Q Okay.

7 A And proven in a court of law that he's done  
8 this, and he's convicted with that.

9 Q Okay. Well, let me ask you about Abu Marzook.  
10 We have a United States court that has "found more than  
11 sufficient evidence to show that Abu Marzook was a  
12 member of the conspiracy known as Hamas." And my  
13 question to you is that finding sufficient in your mind  
14 to establish some level of guilt that would cause your  
15 organization not to support Abu Marzook?

16 A I'm not aware of any procedure of court, court  
17 procedure that ever convicted Abu Marzook. That's the  
18 first time I hear from you, but I don't know if that's  
19 true or not, but that's what you're reading. But I  
20 never -- I'm not to this moment that Abu Marzook ever  
21 been tried in a court of law in the United States and  
22 proven guilty.

23 Q And to be fair, this was in connection with his  
24 extradition hearing that the court made this finding,

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1 does that --

2 A I am not aware of that.

3 Q Would that be something you'd need to look into  
4 more before you'd decide whether to further support  
5 Abu Marzook?

6 A Yes, of course have to look into more. We don't  
7 support Marzook as a leader of Hamas or anything. We  
8 support people as individuals as humans, and that's more  
9 important to us than their title.

10 Q Okay. Now, you understand, for example, that  
11 Basran Elashye who you've referred to repeatedly during  
12 your deposition is currently under indictment and  
13 scheduled to go on trial in Dallas, correct?

14 A That's what I heard. That's what the media  
15 says. I'm not privy to allegations or the indictments  
16 or anything of these sorts. I did not see it. I did  
17 not look at it. I'm not knowledgeable of it. So  
18 that's, again, from what goes on in the news from the  
19 media.

20 Q And obviously, you know, he hasn't been tried  
21 yet, but if in fact Mr. Elashye is tried and found  
22 guilty, would that be the kind of guilty finding that  
23 would cause IAP to no longer support Mr. Elashye as an  
24 individual?

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1 A Well, as a matter of fact, when somebody's  
2 guilty, and the case is over, it's over. There's no  
3 need to go after supporting him except in the human for  
4 his family or something like that, but other than that,  
5 it would be over, I guess.

6 Q Mr. Fennerty would probably tell you that  
7 most -- even if you're convicted, most defendants  
8 recognize that there are rights of appeal?

9 A Well, that's what I'm talking about. Once it's  
10 over, if that's the appeal, this process, that means  
11 there's process yet.

12 Q Okay.

13 A But if it's over, all the process, and all the  
14 legal is exhausted, you know, then that's different.

15 Q And now when you say that once the process is  
16 over, the support for the individual would stop if they  
17 are determined to be guilty, is that because they're  
18 guilty or is it because there's nothing further that IAP  
19 can do?

20 A Because they are guilty, there's nothing  
21 further, both, there's nothing further the IAP can do  
22 for them.

23 Q Another point I wanted to clarify about your  
24 prior testimony, I had asked you whether -- I said

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1 anybody who you know of that's been an officer or  
2 director of UASR that's also held a position with AMS or  
3 IAP, and your answer was again not when I am in charge,  
4 no. And, again, I wanted to find out whether you are  
5 aware of anyone who was involved with UASR but also held  
6 a position with IAP Dallas or IAP National prior to the  
7 time that you were in charge of IAP National?

8 A I don't know before prior that, I don't know.

9 Q Okay. During your last session of your  
10 deposition I had asked you some questions about who was  
11 registered with the Illinois Secretary of State as being  
12 the directors of AMS, and I think you had indicated that  
13 you could look into it and find out, but you didn't know  
14 offhand. My question to you is whether you are in a  
15 position today to tell me who are the directors as  
16 listed with the Illinois Secretary of State for AMS?

17 MR. FENNERTY: What years?

18 MR. HOFFMAN: Q Today.

19 A I did not look exactly who's -- no, I did not  
20 look into it.

21 (Document marked as Exhibit No. 44 for ID.)

22 MR. HOFFMAN: Q Mr. Jaber, you've been handed  
23 what's been marked as Exhibit 44. Again, this is a  
24 document that was produced after your last deposition

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1 session, and it purports to be bylaws apparently for  
2 AMS; is that correct?

3 A Yes.

4 Q If you could look at the last page, it appears  
5 as though these are certified by Mr. Abdel Baset  
6 Hamayel, correct?

7 A Yes.

8 Q I wanted to ask you some questions some of the  
9 things that appear in the text of these bylaws, but  
10 first I'm curious on the signature page there, the date  
11 that's written in is June 1 of 2002, do you see that?

12 A Yes, I see that.

13 Q Were there bylaws that existed prior to this  
14 document?

15 A No, I think these ratified, but the same bylaws,  
16 but what was ratified finalized June 1st.

17 Q Okay. So just so I understand, it's your  
18 testimony that these same bylaws have always been in  
19 effect but they were never ratified until June 1st of  
20 2002?

21 A That's possible, yes.

22 Q When you say it's possible, do you know one way  
23 or the other?

24 A Most likely they were there. I would say yes,

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1 they were there before, but officially to be adopted by  
2 the, you know, the AMS, it seems like it from this date,  
3 you know, Mr. Hamayel was the secretary who kept the  
4 dates of course that seems like it's when it was  
5 adopted.

6 Q So would it be fair to say that in the years  
7 prior to June 1, 2002, AMS conducted its activities  
8 consistent with these bylaws even if they weren't  
9 formally adopted?

10 A Most likely, yes.

11 Q All right. Let's look at the first page.  
12 Article 4 is the mission and general objectives, do you  
13 see that?

14 A Hm-hm. Yes, I do.

15 Q Under Section 2, the third numbered item says  
16 rallying efforts in support of the true solution to the  
17 Palestinian problem, do you see that?

18 A Yes, I see that.

19 Q What is the true solution that's referenced  
20 there?

21 A Just and comprehensive solution.

22 Q Is that a particular solution in terms of  
23 political or geographical results or is it a broader  
24 notion?

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A It's broad, just and comprehensive which takes in account all the issues that are standing or that we have in this cause including the right of returns including Jerusalem, including settlements, including anything that has to do with the case to be comprehensive instead of piece by piece like the Alsa agreement, this so-called road map to nowhere, you know, peace, that's the kind.

Q So in your mind when you talk about a just and comprehensive resolution, do you have a particular set of circumstances that will exist at the end of this resolution?

A In my personal view?

Q Yes.

A Should be dealt with from A to Z. The only solution I believe that would ever solve this conflict that the two sides come in with a clear intentions and good faith, that to deal with all the issues from A to Z, all of it together, the table, not peace by peace, not to start with X, Y like what they're doing. That's the problem with this issue. Nobody wants to recognize, specifically the Israeli. Also government does not want to deal with the issues from A. You know, there's the occupation, there is people who being dispelled from

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their homes, people done injustice for the last 55 years. There is people who, you know, they lost their land. There's people who lost their land to the settlers. There's people who get killed. There's people suffering in jail.

All these things in my opinion has to be at the front, not at the back, like the way it's doing now. That's why it's failing, and it's going to fail. That's why it failed also. I am against also because I knew it does not work, and that's why it failed. This one also I am against the road map, because this is going to fail. It's not going to work.

And I need some solution to see that these things has to be up front and both people coming with good faith saying here, we want to solve it. We willing to talk about it. But to say that we're not willing to talk about settlement, we're not willing to talk about Jerusalem, we're not willing to talk about the land, we're not willing to talk about the resources, we're not talking about water, we're not talking about the borders, we're not talking about disguise. What else are we going to talk about?

What's interested to the Israelis which is they want to see that surrender of the people, the

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Palestinian people to the Israelis completely, and they should be thankful and pray to God that the Israelis even wanted to occupy them. That does not work. That's not good faith in my opinion. That's my philosophy. And I advocate this kind of philosophy, because I believe that's the only solution to this cause.

Q Okay. Let me try to refine what I --

A If that helps the Israelis somehow.

Q What I'm trying to get at, you've sort of described your view of a just and comprehensive resolution in terms of a process that everything needs to be resolved, and what I wanted to figure out is in your mind does a just and comprehensive solution have to have certain outcomes or is any outcome agreeable as long as it's one that's resolved through the right process?

A Any outcome that is resolved by the parties. And has to be with the free will, not by through the gun. It has to be free will. And there's justice, and, you know, honest broker that will be there to just maybe whether appear United Nations, whether United States that becomes immaterial, but that's the only way to get, not somebody who has the power and all the strings and somebody doesn't -- somebody who can dictate and

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somebody who cannot even, you know, raise their eyebrows.

That's the solution. Otherwise we'll go on forever with bloodshed and with all these things going on and the loss of lives on both sides unfortunately, and that's unnecessary.

We could save all these lives and all these headaches and all these problems between Arabs and Jews forever. Otherwise will get worse and get worse, not going to help anyone. In my opinion should be solved. Says yes, we want to solve it. I want to sit down with you, Mr. Hoffman, and I want to talk about it, but we'll talk about it as equal, not because you have the law is in your hands or because you have the guns, and you have the army, and you occupy my, you know, my land and my home, and you can destroy it at any time at my overhead if I do not oblige to your demands and your requests. That's what's going on now.

We want you to do this. All the Israeli says we want you to do this. We want you, Arafat, to do this, 1, 2, 3, 4, 5, 6, 7. We don't want to do anything for you unless you do all these things, which after that, there's no reason to do anything after that. That's not solution. That's dictation. That's why

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1 these innocent lives are lost on both sides for no  
2 reason.

3 Q I don't mean to cut off your answer?

4 A That's my opinion.

5 Q I don't mean to cut off your answer. I think  
6 you answered my question a while back. If you turn to  
7 the next page?

8 A Page 44?

9 Q Correct. Paragraph No. 10 at the top talks  
10 about cooperating with other AMS's having similar  
11 objectives, do you know what's meant by that reference,  
12 other AMS's?

13 A That should be other organizations. I don't  
14 know. Must have been a mistake. Like I said earlier  
15 before that we will work with any organization that  
16 shares the views or shares the objectives and the  
17 beliefs that we have.

18 Q Okay. Moving down under Article 6, the board of  
19 directors, Section 3 talks about regular meetings, do  
20 you see that?

21 A Hm-hm. Yes, I do.

22 Q And it says that the board of directors shall  
23 meet annually, in person, at least four times in  
24 regularly scheduled meetings wherein a quorum shall be

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1 declared as specified in these bylaws. Has that in fact  
2 happened during the life of AMS?

3 A That's very hard to say. I don't know. Because  
4 sometimes -- we never went exactly by the letter with  
5 the bylaws. I can tell you.

6 Q Was there always at least one meeting in each  
7 year of the board of directors?

8 A Yes, I suppose at least one meeting, yes.

9 Q Turn to the next page. There's Article 7, and  
10 it relates to officers, do you see that?

11 A Yes, I see.

12 Q And it lists some officers. First of all,  
13 there's a chairperson. Is that you currently?

14 A Yes, the chairperson and the president supposed  
15 to be the same.

16 Q Okay. Who would be the vice chairperson,  
17 Section 2 here?

18 A Actually we never had vice chair, but usually we  
19 never had any vice chairs I remember at least.

20 Q Is there somebody who has served in the role as  
21 general secretary of AMS?

22 A Yes, like now Abdel Basad, he's the general  
23 secretary now.

24 Q Was there somebody that served in that role

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1 before him?

2 A Sabri.

3 Q Sabri Samirah. Section 3 (a) talks about a book  
4 of minutes, and it indicates that the general secretary  
5 shall keep or cause to be kept at the AMS's principal  
6 office or other place as the Board of Directors may  
7 dictate -- direct, I'm sorry, a book of minutes of all  
8 meetings, proceedings, and Actions of the Board of  
9 Directors and of its committees. And my question to you  
10 is does such a book of minutes exist?

11 A Whenever it's possible, yes, they should.

12 Q When you say whenever?

13 A Not a book, in the form of book. I mean  
14 records.

15 Q When you say that, is it your recollection that  
16 it has been the regular practice for the general  
17 secretary to take minutes of board meetings?

18 A Yes, I think we produced some of these minutes  
19 to you.

20 Q We'll get to those in a minute. I just wanted  
21 to understand what the practice was. Was it generally  
22 the practice of AMS to keep the minutes after they were  
23 created?

24 A Yes, they should.

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1 Q Turn to the next page, Page 4. There's  
2 Article 9 talks about the executive committee, do you  
3 see that?

4 A Yes.

5 Q You've testified some about the executive  
6 committee, and I think you've indicated that you as  
7 president were part of that, correct?

8 A Yes.

9 Q And vice president, am I correct that's a  
10 position that has never been filled?

11 A No, never been filled.

12 Q And the secretary of the executive committee,  
13 would that be the same person as the general secretary?

14 A Yes, most of the time.

15 Q So currently that would be Abdul Baset Hamayel?

16 A Yes.

17 Q What about there's a reference to a treasurer of  
18 the executive committee, who is that?

19 A Well, treasurer, who did the functions of a  
20 treasurer usually secretary, because he has a full-time  
21 job, and he does all the bookkeeping and this. But he  
22 used to have treasurer, I don't remember who was it, but  
23 we used to have treasurer, but usually very seldom  
24 except in general look at the general accounts or look

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1 at the statements, the financial statements, and other  
2 things that is general practice or meetings.

3 Q And then if you turn to the next page, Page 5,  
4 Section 12 talks about the responsibilities of the  
5 secretary of the executive committee. And, again, this  
6 secretary is to keep a book of minutes of all meetings,  
7 proceedings, et cetera. And has that been the practice  
8 to keep such a book of minutes?

9 A As much as possible, yes, we always trying to do  
10 that.

11 (Document marked as Exhibit No. 45 for ID.)

12 MR. HOFFMAN: Q Mr. Jaber, you've been handed  
13 what's been marked as Group Exhibit 45. Again, these  
14 are documents that were produced subsequent to your last  
15 deposition session and all appear to be agendas for the  
16 board of directors or the IAP National, is that correct?

17 A That's what it reads, yes.

18 Q Now, have agendas of this type been prepared to  
19 your recollection for all IAP National board meetings  
20 since you've been the president?

21 A Yes, that's usually that the chairman or the  
22 secretary prepared these agendas.

23 Q I will represent to you that these are the only  
24 agendas that I have seen in the document production to

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1 date. Do you know why it is that there are not  
2 additional agendas that have been produced?

3 A Well, obviously because poor bookkeeping on the  
4 part of the secretary. Like I said, he thinks this is  
5 not necessary, then he takes the decision on his own  
6 keep it, just throw it away.

7 Q So it's your belief and understanding that  
8 earlier agendas would have been disposed of?

9 A That's what I would suppose, yes.

10 Q All right. Let me ask you a few questions about  
11 some of the agendas that we do have here. First of all,  
12 on the first page, there's a reference on Item No. 7 to  
13 an annual convention, MAS-IQNA proposal, what is  
14 MAS-IQNA?

15 A Muslim American Society, the Islamic Circle of  
16 North America.

17 Q Do you know what the proposal that's referenced  
18 there is?

19 A We were going to hold joint convention with  
20 these two organizations with our organization, because  
21 they decided they wanted to hold the convention the same  
22 time we do. So we're going to work out something that  
23 we do it as a joint convention.

24 Q Did that ever happen?

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1 A No, it never took place.

2 Q Now, Item No. 9 makes reference to a presidency  
3 vacancy, do you know what that refers to?

4 A Yeah, that's when I resigned.

5 Q When you resigned as what, president of IAP  
6 National?

7 A IAP National and AMS.

8 Q When did that occur?

9 A That I think -- I think June 1st or July 1st,  
10 something like that.

11 Q Of 2000?

12 A Of 2000 -- 2002. I resigned, and I wanted to go  
13 back into my own business and just do my work.

14 Q Who has currently filled that position of the  
15 presidency?

16 A Unfortunately it's me still.

17 Q Under new business, there's an Item No. 14 in  
18 handwriting, do you know whose handwriting this is?

19 A This seems like is Sabri. I don't know. It  
20 could be Hamayel. I don't know.

21 Q Item No. 14 says legality of DIS period, No. 2,  
22 is that what it appears to say?

23 A I don't know, yeah, period, No. 2.

24 Q Do you know what that refers to?

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1 A I don't remember.

2 Q No. 15 makes reference to a constitutional  
3 amendment from Sabri, do you know what that refers to?

4 A Yeah, because that's where I resigned, and we  
5 had a problem with the constitutional things to make  
6 everything and process proper and to fill these  
7 vacancies. So that he proposed the constitutional  
8 amendment. Like I said he wants to propose the  
9 constitutional amendment so to make that process within  
10 the constitutional in the bylaws.

11 Q Turning to the next page, June 1 of 2002 agenda,  
12 Item No. 9 makes reference to chapters, L.A., Michigan,  
13 and D.C., do you see that?

14 A Yes.

15 Q What was scheduled to take place regarding the  
16 chapters during that time frame?

17 A Well, that's again, like I said, because the use  
18 of a chapter was used loosely. And I said we want those  
19 people if you want to be chapters to become legal and to  
20 apply for the process of the state that they are -- they  
21 incorporate and so on and so forth. You want to discuss  
22 this to make sure that those people understand this.  
23 That's my recollection.

24 Q Now, Item No. 10, there's a reference to IAP

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1 bylaws, and if you'll note that the date this agenda,  
2 June 1, 2002 appears to correspond with the date of  
3 Exhibit 44, the bylaws?

4 A Yeah, that's what I said when I said earlier the  
5 44. That's why probably why it's June 1st, because  
6 that's when it was adopted.

7 Q Okay. Turning to the third page, this is the  
8 board of directors agenda for July 14th, 2001. And on  
9 Item No. 9, there's again a reference to chapters, do  
10 you see that?

11 A Yes.

12 Q And what was scheduled to be discussed regarding  
13 the chapters during that meeting if you know?

14 A Again, the same problem. They had those people,  
15 and they wanted to ask them again to from that point we  
16 want you to do a chapter and, you know, organize it.  
17 The people who are on the committee, they got problems  
18 with each other. So they talking about solving that  
19 conflict, you know, between them, and see if we work it  
20 out. And as a matter of fact, I went there and I tried  
21 to solve it out and never been solved to this moment.

22 Q Are you talking about the reference to the  
23 solving the conflict in the L.A. chapter?

24 A Right.

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1 Q And then there's also references to opening  
2 offices in D.C. and Michigan?

3 A Right, the same thing, we wanted to open these  
4 offices. Again, we brought it up to open an office.  
5 Still we wanted to open an office in D.C. To this  
6 moment, we did not, but we still working on that. And  
7 Michigan, too. But Michigan seems like they gave up. I  
8 think that's lost. That's why we gave them \$5,000. It  
9 still did not work out.

10 Q Item No. 14 there's a reference to Al-Zaytuna,  
11 do you know what that was about?

12 A That's about the affairs of Al-Zaytuna who's  
13 going to become the editors, the articles and how we  
14 wanted to move it out, actually to -- wanted to be moved  
15 to D.C.

16 Q All right. Turning to the last page, this is  
17 now a board of directors agenda for January 13th of  
18 2001. And the fourth item talks about a briefing of IAP  
19 constitution, structure and membership board of  
20 directors. I'm curious and particular what the  
21 reference of what the IAP constitution is about?

22 A You know, any constitution, any organization has  
23 to be updated to meet with the needs and the structure  
24 of the organizations. So we always need to, you know,

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1 to go visit the constitution and see whatever needed to  
2 be updated, whatever needed to be taken out, whatever  
3 needed to be amended and so on and so forth.

4 Q What constitution are you talking about, though?

5 A That's the same constitution. Probably this  
6 one.

7 Q The bylaws?

8 A The bylaws, yeah. That's called the  
9 constitution.

10 Q So your understanding the reference to  
11 constitution is a reference to the bylaws?

12 A Usually it is, yes.

13 Q Okay. Now, this is a January 13th, 2001 meeting  
14 agenda. These bylaws were actually approved on  
15 June 1, 2002. So my question to you is given that this  
16 is a year and a half before the bylaws were implemented,  
17 what was it in particular that was being referred to by  
18 IAP constitution, was there an earlier draft?

19 A I don't recall exactly, but I know that we  
20 usually, you know, I usually bring this actually agenda  
21 items, because I believe in always updating the  
22 constitution to meet the needs and the structure of the  
23 IAP. This is not the first time, no, I don't think it  
24 would be the last time, whenever. Almost on an annual

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1 basis we bring this up. Because we need to update and  
2 change the constitution to fit the operational needs of  
3 the IAP, but in particular exactly, I don't remember.

4 Q All right. Moving down to Item No. 11, there's  
5 a reference to approving the 2001 plan. What is that a  
6 reference to, what does that mean, 2001 plan?

7 A Well, I presented, you know, a plan for the IAP,  
8 because you see June usually would be when I took over  
9 in June, I think 1996, '96 or '97. '96, I think. And  
10 so I wanted to bring all these items of course. And  
11 December supposedly. But this meeting took in January  
12 that the plan what we try to accomplish, like action  
13 plan.

14 Q These action plans, were they usually written  
15 out?

16 A Usually I write them out, yes.

17 Q Is that something that you did each year to  
18 write out a plan for IAP for the year ahead?

19 A Well, the way I did it, you know, sometimes I  
20 wrote hold. Sometimes there isn't that much to change,  
21 and we refer to the election plan to continue from like  
22 the year before, whatever it was not accomplished. It  
23 was not like opening an office let's say for D.C. So we  
24 just continue on this action plan will be for this year

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1 to try to open a chapter in Michigan and will be part of  
2 the new plan if it was not accomplished the year before,  
3 and these kind of things will continue on. Sometimes  
4 there is no need to write a whole new plan, because  
5 there's plenty of things on the table to finish.

6 Q Now, I don't think I've seen anywhere in the  
7 production an IAP plan for a coming year, is that a  
8 document that still exists for any given year?

9 A Should be. I don't see why not. What he  
10 looked. That's what I say, the poor record keeping  
11 again, you know.

12 Q Do you know what effort was made to locate or  
13 identify?

14 A I'm sure he did everything possible, because I  
15 told him to do everything possible to find out, you  
16 know, whatever documents that needed to be, you know,  
17 part of the minutes and whatever it is. I asked him  
18 specifically about the minutes, not about the plan,  
19 because the plan never brought up in, you know,  
20 discussion, but that's probably one of the reasons  
21 because it was not requested.

22 Q The farther down there's a reference in No. 13  
23 to approving the budget of 2001. Was it also part of  
24 your practice to prepare a budget for the year ahead

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1 every year for AMS or IAP National?

2 A I tried -- at one point I tried to do that, but  
3 I never -- it was not an annual practice, no.

4 Q Did this budget go hand in hand sort of with the  
5 preparation of the plan?

6 A Somehow, yes.

7 Q And are you aware of any budgets having been  
8 produced as part of the discovery in this case?

9 A Yeah, I think you had some of these here,  
10 budgets.

11 Q If you could take a look and see when you're  
12 referring to budgets whether it's something that we've  
13 already looked at here?

14 A Yeah. This is what we consider budget, like it  
15 says financial report of 1993 for instance. This is our  
16 budget, this is what we have, and this is what we  
17 introduced what we had for the expenses, and that's what  
18 we expected usually about the same, because very similar  
19 to whatever.

20 MR. FENNERTY: What exhibit number is on there?

21 THE WITNESS: 10 this one. Annual 1994, 11. I  
22 write some budget, too, some items.

23 MR. HOFFMAN: Q Is it your testimony that  
24 Exhibits 10 and 11 are examples of the types of budgets

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1 that are referred to here on the last page of  
2 Exhibit 45?

3 A Yeah, that would be something we call budget.  
4 This budget would be, you know.

5 Q Turning back to Exhibit 45, Item No. 17 talks  
6 about making decisions on major current issues, and the  
7 third check item there is fund raising, Ramadan and work  
8 with HLF. Do you know what the reference to working  
9 with HLF was about?

10 A Yeah, that's the contract, the annual contract  
11 we do with them, which is we give them a copy of it  
12 whether we're going to do it this year, because each  
13 year we have to make a decision whether we're going to  
14 go with them, the proposal. If satisfactory, we need to  
15 renegotiate with them and so forth and so on.

16 Q The next checked item down is relationship with  
17 AMEL, and that would be American Middle Eastern League  
18 for Palestine, correct?

19 A Right.

20 Q Do you know what that's a reference to?

21 A Actually that's one of my ideas if I recall  
22 that, you know, should AMEL or AMEL should be part of  
23 the IAP National and, you know, comes under the board of  
24 directors and proposed them if they want to come, you

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1 know, be part of the IAP National, but obviously they  
2 didn't want to. So it didn't work out.

3 Q When you say that that proposal was made to  
4 AMELP, who specifically at AMELP was the proposal that  
5 had joined as part of AMEL IAP National communicated to?

6 A I think Omar Ahmad. Rasan Abdul, I think he was  
7 on the board there or he was the president. I don't  
8 remember. But I talked to, you know, probably to both  
9 of them. And I said, you know, whatever who was in  
10 charge, but I know Omar Ahmad was the chairman of it,  
11 but I brought it up several times, you know, if he wants  
12 to relinquish it. But if he's going to be part of this,  
13 he's going to be part of supervision on the board of  
14 directors of the IAP, but that never worked out.

15 Q Okay. I just want to make sure, Omar Ahmad  
16 or --

17 A Omar Ahmad.

18 Q Okay.

19 (Document marked as Exhibit No. 46 for ID.)

20 MR. HOFFMAN: Q Mr. Jaber, you've been handed  
21 what's been marked as Deposition Exhibit 46. Are you  
22 familiar with this document?

23 A Now I am.

24 Q Is this an example of the kinds of minutes that

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1 would be taken from the IAP convention committee in  
2 connection with its activities?

3 A Yes, and most originate in, you know, for in  
4 Arabic. I'm surprised they even had it in English this  
5 time. That's why now I'm familiar with it. Before I  
6 don't remember seeing it. I think that happens even I  
7 was out of the country. I was not even there.

8 Q The -- you mentioned that they're usually in  
9 Arabic, would that have been true with any other meeting  
10 minutes for IAP committees or the board itself?

11 A Yeah, sometimes they take them in Arabic. He  
12 takes them in Arabic. It depends who takes the minutes  
13 actually. This I can see why this actually in English,  
14 because the one who took it does not write Arabic.

15 Q Who's the one that wrote it?

16 A That's my guess, Manal.

17 Q I'm sorry. Manal?

18 A The last one, she took these minutes, and she  
19 does not read or write Arabic to my knowledge or very  
20 poorly, because she was born and raised here.

21 Q Aside from the fact that this is in English and  
22 not in Arabic, is this fairly typical of how minutes  
23 would look in connection with any IAP board or committee  
24 meeting?

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1 A No. This is more organized compared to the ones  
2 taken in Arabic. A lot better. Arabic just takes notes  
3 fast, and that's it, but he knows how to read them and  
4 just say back to us what it means.

5 Q Now, I haven't seen any other documents that  
6 purport to be board meeting minutes and certainly not in  
7 Arabic?

8 A The convention?

9 Q The convention committee or the board of  
10 directors, do you know whether any such minutes exist?

11 A To my best of knowledge, I think we send them to  
12 you. You should look. I send you everything, whatever  
13 we had. Even from the original documentation we send  
14 you. You should have them.

15 Q Mr. Fennerty, I would ask, and Mr. Jaber, if you  
16 can go back at some point and try to see if we can  
17 identify those, because I don't recall ever seeing them.  
18 And if they exist, you know, fine, I'd just like to have  
19 them identified. If not, I'd like to make a request  
20 that they be produced to the extent that they still  
21 exist.

22 Now, typically what is done with the board  
23 meeting minutes after they're taken down?

24 A Usually at least kept for a year, you know, so

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1 we can go back for the second year. Suppose my opinion  
2 always that should be kept forever. You know, these are  
3 history and documents in my opinion.

4 Depends on the secretary. Secretary takes them  
5 sometimes, I think probably because of ignorance of  
6 things are important sometimes would be he thinks is not  
7 important, and he would do something like that, you  
8 know, Abdel Based. It's not important. So it doesn't  
9 need to go over it. He doesn't need over burden of  
10 work, you know, to keep it. So he will throw it away.  
11 He says we don't need it anymore. That's it. The year  
12 is over. Then it's finished. That's how he thinks.

13 Q Certainly consistent with what we saw in the  
14 bylaws, they should have been retained, correct?

15 A Should have been, yes. I always tell him, but I  
16 don't check every day. That's why they need somebody  
17 with a full-time job to stay there, you know, to deal  
18 with everything.

19 Q Mr. Jaber, I wanted to ask you a series of  
20 questions about a videotape that we've got, but I think  
21 in order to do that, we need to move some equipment  
22 around and set that up so that everyone can see that.  
23 So what I would like to do is take a short break while  
24 we sort of jockey stuff around here, and we can resume

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1 once we get our technical --

2 THE VIDEOGRAPHER: Going off the record at 2:24 p.m.

3 Whereupon, a brief recess was taken.)

4 THE VIDEOGRAPHER: Going back on the record at  
5 2:38 p.m. Please proceed.

6 MR. HOFFMAN: Q Mr. Jaber, as I had mentioned  
7 before we broke, we have a videotape I'd like to show to  
8 you. I'd like to show you some excerpts from it and ask  
9 you some questions. We're starting here time sequence  
10 25, 26 seconds in, and this screen indicates that it is  
11 produced by -- produced for the -- excuse me. Let me  
12 take a step back.

13 All right. Time sequence 41 produced by  
14 Educational Video International, Inc. for Islamic  
15 Association for Palestine. Now, are you familiar with  
16 that entity that created -- that produced this video?

17 A No. First time I hear about it.

18 Q We'll shoot ahead if we can to the time  
19 sequence, imprecise science here. Okay. Now, going  
20 back just a second here at time sequence 2 minutes, is  
21 this a logo then that has been used by the Islamic  
22 Association for Palestine IAP National?

23 A Yeah, I seen this logo before.

24 Q Okay. And it's one that's commonly used by IAP

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1 National or was at least in the past?

2 A I think so. That seems like it, yes.

3 Q Okay. Moving on then, are you familiar with --  
4 we'll see a larger picture of this, but is this a logo  
5 if you will that you are familiar with here at time  
6 sequence 210?

7 A Not logo. That's just a map.

8 Q Okay. What does it say on that map?

9 A That says Palestine, Islamic Palestine from the  
10 sea to the river.

11 Q From the sea to the river. Have you seen that  
12 phraseology used in connection with a map such as this  
13 in connection with any organizations?

14 A No, I don't remember seeing that.

15 Q Okay. Do you have an understanding as to what  
16 sea and what river are being referred to on this  
17 picture?

18 A Yes, I do.

19 Q What do you understand that to mean?

20 A Mediterranean to the Jordan River.

21 Q And the map that we're looking at, that is what  
22 is today Israel and the occupied territories?

23 A Yes.

24 Q Let's shoot ahead a little bit. Do you

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1 recognize this individual?

2 A No, but I read the name.

3 Q What is the name?

4 A Ashid Alghanoshi

5 Q Could you spell that so the court reporter can  
6 get the name down?

7 A I'll spell it the best I know.

8 Q As best you can.

9 A A-s-h-i-d, I would say, Ashid, Alghanoshi,  
10 A-l-g-h-a-n-o-s-h-i. That's good enough for me.

11 Q And do you know who that individual is?

12 A I know of him, but I don't know him.

13 Q You know of him, who do you know him to be?

14 A This is a very well known international Islamic  
15 leader.

16 Q If we go back for just a second here, you'll see  
17 a full screen shot of the map and the phrasing that we  
18 had seen earlier. Do you see there's some texts towards  
19 the bottom that wasn't in the earlier picture?

20 A I mean the first two words, but, yeah, the rest  
21 are not.

22 Q What do you see the first two words saying what?

23 A Convention, talking about (inaudible) which is  
24 the convention of the union.

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1 Q Okay. And the union, did you have an  
2 understanding or know what that's a reference to?

3 A I would assume that they were talking about the  
4 IAP, but you have to go from all of it from the  
5 beginning to know what they're talking about.

6 Q Do you know who this individual is?

7 A Yes. This is Jasser Bushnaq.

8 Q Okay. That's Mr. Bushnaq, and he was during  
9 sometime in the early 90's the president of IAP  
10 National?

11 A That's my understanding.

12 Q And that was at time sequence at approximately  
13 18 minutes.

14 And this gentleman, do you know who this is?

15 A That looks like the Qaradawi.

16 Q Qaradawi?

17 A Yes, it looks like him.

18 Q And he is a well known Muslim?

19 A Scholar.

20 Q Scholar?

21 A Yes.

22 Q Okay. And just for the record, we're at time  
23 sequence right now 26 minutes and roughly 10 seconds.  
24 Do you recall attending any conferences at which

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1 Mr. Qaradawi spoke?

2 A Oh, I seen him more than one conference.

3 Q Okay. Do you know whether you attended this  
4 particular conference?

5 A I don't remember, because he speaking. So I  
6 don't know if this is the conference. It's very hard to  
7 tell unless you have all the sequences together.

8 Q Without listening the entirety of the speech,  
9 you wouldn't be able to tell?

10 A Not even the speech. You have to go through the  
11 whole thing, because the speech usually probably just  
12 about the same.

13 Q Okay.

14 A And if he's talking about special, you know,  
15 from one, it's not going to be much different.

16 Q All right.

17 A You have to go through the whole speech, what is  
18 it, what year and what all these things where this place  
19 took. All these --

20 Q Sorry. If I were to tell you that this took  
21 place in Kansas City in 1989, would that help you to  
22 know whether or not you attended that?

23 A I don't remember going to that one, not in '89.  
24 I don't remember at least.

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Q Now, Mr. Qaradawi, is he the same individual who recently issued a fatwa that said it was permissible for Palestinian or Muslim women to engage in suicide operations?

A I did not read that fatwa.

Q You're not familiar with that?

A I did not read it, no. I didn't see it.

Q Are you familiar with Mr. Qaradawi issuing fatwas?

A He's a scholar. If anybody can issue fatwa, it would be him.

Q Just for the record, what is a fatwa?

A A fatwa is an Islamic decree of explanation of something that would be permissible under the Islamic laws. That's my best definition of it.

Q Moving ahead to time sequence -- went too far. All right. Beginning at time sequence 5824, you'll see that there's an individual whose head is covered entirely?

A Hm-hm. I see.

Q Is that -- who is that that's escorting him, do you know?

A I can't see. It's too far.

Q Okay. Are you able to tell who that person was

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that escorted him?

A No, it's too far. His complexions are not clear.

Q Have you ever been -- attended a conference at which there was a speaker who was hooded as this individual is?

A I may well have. I may have been at that conference. I remember something like that.

Q So that strikes you as somewhat familiar as having seen a speaker whose identity was hidden in this fashion?

A I think once I have seen that, yes.

Q Okay. And did you understand that that person was a representative of Hamas?

A I don't remember what -- you know, how he was introduced, if he was a member or not. So I don't remember any of that, choose as member or tried to emulate somebody who was a member or he has -- I don't remember any of these things.

Q All right. Let me ask you, what does this say on this flag, is there any significance to the writing on there?

A That says there is no God but Allah for Muhammed Hismas Injur, Muhammed Hismas Injur. (Phonetic.)

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Q Okay. The hooded speaker that you recall seeing whether it was at this particular convention or a different one, do you recall that speaker advocating a call to Jihad?

A I don't remember that.

Q Do you recall the hooded speaker that you saw advocating violence against Jews or Israelis?

A I don't remember. Because so often hard to hear because of big crowd. I don't remember where I was sitting, but I remember the picture. I don't remember what he was saying.

Q I turned the volume up just a little bit in case it's helpful to you. It doesn't mean anything to me, but it may help you to place it into context. But the hooded speaker that you recall here seeing, did he advocate the support of terrorism or suicide bombings?

A I don't remember, like I said.

Q Okay. Do you recall whether the hooded speaker you saw advocated support for Hamas?

A I don't remember. I remember the picture, but I don't remember the words, what he said.

Q When you saw this hooded speaker that you saw, do you have an understanding as to why his identity was hidden?

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A I have no idea. Maybe he was just illegal in the country. Maybe he doesn't want to be known. I did not ask. I never even inquired. I don't really care.

Q It never occurred to you that that was unusual?

A No. There's people like they come here, and if they want to speak, they don't want to be recognized, because if they go back home to Palestine, then the Israelis will put them in jail and torture them. Why should they put themselves in that predicament? Understand people go even rallies, they cover themselves, because that's common in Israel that if they are known and the people who rallied against Israel or against the brutalities of Israel that will be questioned at the time they go back to visit their family or to go, you know, for vacation, whatever it is, they will be questioned. They will be tortured. They will be imprisoned. And all these things. Any sane person would not put himself into that predicament. So cover himself to not to be recognized.

Q Now, I think you had testified that you had seen somebody make a presentation at a gathering or convention like this with their identity covered one time, correct?

A Yeah, I remember something like this. This

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1 picture sounds familiar to me.

2 Q Okay.

3 A Looks familiar. So long, but looks familiar.

4 Q All right. I guess my point is is that it's not  
5 a common occurrence in the various -- in the numerous  
6 conventions that you've attended, it has not been a  
7 common occurrence to see somebody who's hooded like  
8 this?

9 A Not like this, but people hooded different ways.  
10 I mean they cover themselves in many ways.

11 Q Okay. So you've seen other hooded speakers  
12 during the course of your many conventions you've  
13 attended?

14 A Not necessarily speakers. That could be in  
15 rallies. Like I said, this is very common.

16 Q I'm talking about speakers in particular now?

17 A Speakers, I don't remember. I don't recall.

18 Q You only recall the one as you sit here?

19 A I remember. This sounds familiar. It looks  
20 familiar.

21 Q To move ahead just a little bit, I wanted to  
22 stop here, because this also has, again, the map that we  
23 saw earlier, and I wanted to see whether any of the  
24 language that you were unable to read before is any

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1 clearer here to you in terms of placing this for time or  
2 events or what else it says?

3 A Actually it's less clearer than the first one.

4 Q I'm sorry?

5 A It's less clearer than the first one.

6 Q Okay. I thought perhaps that this has the  
7 entirety of the -- but you're not able to read anything  
8 further from this?

9 A No, that the words -- talking about the first  
10 one, which is convention, was more clear the first time.

11 Q The logo that we've been talking about with the  
12 map and the verbiage on it, is that map and those words  
13 something you've seen used in conjunction with Hamas?

14 A I've seen this in conjunction with a lot of  
15 organizations even including the PLO.

16 Q Are you able to read it any better now?

17 A Oh, yeah. It says -- (Inaudible.)

18 Q All right. Would you slow down for the court  
19 reporter?

20 A You're not going to report that. So I'm going  
21 to translate it now.

22 Q Okay.

23 A So it says Palestine Islamic from the sea to the  
24 river, and then it says the Islamic Association for

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1 Palestine conference.

2 Q Is there a reference to the date or the  
3 location?

4 A No, I don't see any.

5 Q Okay. One last section of tape I wanted you to  
6 look at at the very end. Having seen -- obviously these  
7 are small excerpts of what is roughly two hours of tape,  
8 do you have any sort of a level of confidence as to  
9 whether this was the one meeting you attended at which  
10 there was a hooded speaker?

11 A No. See one thing when you go to conference for  
12 three days, I for one at least and probably everybody  
13 else, does not attend every session or everything that  
14 goes on. You take breaks. You go out. You go  
15 sometimes, even leave the whole conference we used to do  
16 and go out shopping or go out sightseeing or stuff like  
17 that.

18 But I remember, you know, I don't know if I was  
19 there or I just passed by, because that's why I don't  
20 remember any of the words that was, you know, was  
21 spoken, but I remember the picture, because from  
22 distance, you know, there was a hall that takes about 3,  
23 4,000 people, and if I pass by, sometimes I go from one  
24 hall to another. I look which one I would like to, you

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1 know, to attend that interest me, you know. I see them  
2 all the time like that, but I don't know if that's --  
3 you know, I don't remember that even seeing that  
4 completely.

5 Q Do you recognize this person?

6 A No, I don't remember.

7 Q At the end here, and this is time sequence  
8 2 hours, 5 minutes and 2 seconds. Now, we see send your  
9 tax deductible donations and information to Occupied  
10 Land Fund, and there's an address given. Are you aware  
11 of any efforts during the IAP conferences in the early  
12 1990's or late 1980's at which there were efforts made  
13 to raise funds for the Occupied Land Fund?

14 A I told you I was not involved in the conferences  
15 or the preparation or the decision making or anything  
16 like that. So I don't remember, you know. I don't get  
17 any information. I'm not involved with it. So if there  
18 is funds, that's possible.

19 Q You don't have any personal knowledge as to the  
20 nature or as to how this request for donations to  
21 Occupied Land Fund came to be in connection with this  
22 video I take it?

23 A I never seen the video before.

24 MR. FENNERTY: We're all going to get copies of that

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1 video?

2 MR. HOFFMAN: Yeah. Well, we've produced -- I know  
3 HLF certainly has a copy.

4 MR. FENNERTY: She didn't think they had it.

5 MR. HOFFMAN: Yeah. We've made it available in our  
6 production. So certainly to the extent you don't have  
7 it, you're welcome to a copy, whatever charges are for  
8 copying tapes but --

9 MR. FENNERTY: Send it to him.

10 MR. HOFFMAN: Hm?

11 MR. FENNERTY: Send the bill to Mr. Jaber.

12 MR. HOFFMAN: Q Okay. I think we're done with the  
13 videotape. I appreciate your indulging --

14 A The show is over?

15 Q The show is over. The conference that you do  
16 recall attending where there was or vaguely recall where  
17 there was a hooded speaker, do you know was that -- who  
18 was it that sponsors that conference?

19 A I don't remember. Like I said, I go to these  
20 conferences, you know, usually national organizations  
21 that they sponsor them. We take them like a vacation,  
22 actually. We treat it like a vacation.

23 Q Now, you've testified at some length in your  
24 first session about the IAP annual conferences that were

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1 held from the time you became the president of IAP,  
2 correct?

3 A Yes.

4 Q Do you recall specifically attending conferences  
5 put on by IAP before the time you became president of  
6 IAP?

7 A Yes, I think they have in conjunction with other  
8 organization, but I don't remember ever that the IAP  
9 held any conference on their own. It's like a joint  
10 conference usually, you know. That's what they -- when  
11 we used to go like MAYA, I think that's held usually  
12 with them. They would have that, and we'll go for MAYA,  
13 and whatever is in there, is in there.

14 Q Actually before we move on to the next exhibit,  
15 I'd like to take out the videotape, and we'll mark it as  
16 a deposition exhibit if we can as long as we asked him  
17 questions about it?

18 MR. FENNERTY: So you're going to make me a copy and  
19 send me a bill.

20 MR. HOFFMAN: Yeah, I think in connection with the  
21 discovery request.

22 MR. FENNERTY: Okay. This is exhibit what number?

23 MR. HOFFMAN: 47.

24 (Videotape marked as Exhibit No. 47 for ID.)

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1 (Document marked as Exhibit No. 48 for ID.)

2 MR. HOFFMAN: Q Mr. Jaber, you've been handed  
3 what's been marked as Exhibit 48. This is an excerpt  
4 from a book written by Steven Emerson called American  
5 Jihad, The Terrorists Living Among Us.

6 In particular it includes a chapter about Hamas.  
7 And I wanted to ask you some questions about some  
8 statements that are made in this book to see if they're  
9 consistent with your recollection or understanding. If  
10 you would turn to what is Page 96 of the book.

11 All right. Now, at the top of Page 96,  
12 Mr. Emerson writes that the IAP's primary activity has  
13 been its annual conferences. At the Kansas City  
14 conference in 1989, in addition to the Hamas commander,  
15 one speaker was Yusuf al-Qaradawi. Was that the  
16 individual that you had identified earlier that you  
17 recognized on the videotape?

18 A Before I answer this question, first we have to  
19 understand who is Steve Emerson for this fact for the  
20 record. And he's a pathological liar and he has this --  
21 something in his heart full of hatred for anything  
22 Islamic or Palestinian. And he's a liar, and he's  
23 discredited by most of the organization, the media  
24 organizations.

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1 So his writings here, I hope it's not going to  
2 be taken or construed as facts of life, because it is  
3 his opinion -- let me finish this. For this fact,  
4 because this man has an agenda, political agenda, and  
5 hate of anything Islamic. And he's a liar. So we make  
6 that clear on the record. Because if you read this  
7 book, he says he never new anything about Islam or about  
8 Palestine. This man wrote a book probably 10, 15 years  
9 earlier to this called the American House of Salud which  
10 is anti-Saudis, anti-Arabs, anti-Muslims. And so he  
11 even denied ofcourse talk will be the Arabs don't read.  
12 So they never know there are other books. That he  
13 always showed his true colors, true beliefs, as someone  
14 who is not historic or an expert, but he gave himself  
15 that title as an expert on terrorism.

16 Establish this fact, so anything he writes here  
17 does not mean anything, does not mean it's a fact. So  
18 I'm not going to get involved in saying if he's a fact  
19 or not fact, because I take all his writing they're not  
20 credible.

21 Q In fairness, Mr. Jaber, you have an agenda as  
22 well, don't you?

23 A Sure, I do.

24 Q Okay. And I'm entitled to ask you as to factual

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1 questions, and what I want to know is whether or not  
2 certain statements that are in here are things that you  
3 agree are factual or you disagree with?

4 A Like I said, I take everything he writes as  
5 unfactual, even if it has some truth to it, because it's  
6 mixed, it will be taken out of context. That's his  
7 conclusion of something what he saw and what he did not  
8 see. Okay.

9 Like he says these things, you know, for  
10 instance, you know, 1989, I don't know about this  
11 conference. I was not involved. There was probably if  
12 I was there maybe was just like any other spectator or  
13 any audience -- part of the audience. But the fact  
14 still remain that Steve Emerson is a Muslim basher, an  
15 Arab basher, a hater, and somebody if he has a button  
16 that he can push that dissolve the Muslim world, he  
17 would push it.

18 Q Mr. Jaber, was Yusuf al-Qaradawi, the man  
19 identified on Page 96, the individual that we saw on the  
20 videotape a few minutes ago that you identified as  
21 Qaradawi, is that the same person?

22 A That's the same name.

23 Q Thank you?

24 A If it was in 1989, I don't know.

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1 Q Okay. But --

2 A Same name.

3 Q My question to you is is it the same person?

4 A Same name. Same use of Qaradawi. The same --  
5 that man I saw his name is Yusuf Qaradawi. Is that the  
6 man he's talking about here, I don't know.

7 Q Okay. The Yusuf al-Qaradawi that you saw on the  
8 videotape, was he an Egyptian-born religious scholar  
9 based in Katar?

10 A That's what I know of, yes.

11 Q Okay.

12 A I'm not sure of these things, but that's what  
13 they say.

14 Q Is it your understanding that the Yusuf  
15 al-Qaradawi that we saw in the videotape wrote a book  
16 called the Lawful and the Prohibited in Islam?

17 A I heard of the book, but I never seen it.

18 Q The farther down the page on the next paragraph,  
19 Mr. Emerson makes reference to a Sheikh Ahmed al-Qattan,  
20 a Palestinian cleric based in Kuwait. Are you familiar  
21 with Mr. Al-Qattan?

22 A I heard the name, yes.

23 Q Have you ever met him?

24 A Not, I don't remember, not face to face, but I

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1 seen him speak in different conferences.

2 Q Okay. And is the description of him as a  
3 Palestinian cleric based in Kuwait, is that accurate?

4 A To my knowledge, he's a Kuwaiti. He's not a  
5 Palestinian. That's what I'm saying. He's a liar, puts  
6 all these lies and prints, but I'm almost positive that  
7 Al-Qattan is a Kuwaiti citizen and has nothing to do  
8 with Palestine.

9 Q Would you turn to Page 97, please. The  
10 paragraph that carries over onto the next page starts  
11 off the IAP's 1996 and 1997 conferences held in Chicago,  
12 can we agree, sir, that IAP did hold conventions in 1996  
13 and 1997 in Chicago?

14 A Yes.

15 Q He identifies one of the speakers at that  
16 convention as -- were those conventions as Mohammad abu  
17 Faris, a Jordanian Islamic leader, are you familiar with  
18 abu Faris?

19 A Abu Faris, yes.

20 Q Abu Faris. And was he in act a speaker at the  
21 IAP conventions in either '96 or '97?

22 A Yes, he was. I don't know which one, but he  
23 was.

24 Q Is he in fact a Jordanian Islamic leader?

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1 A Yes.

2 Q Turning to Page 98, Mr. Emerson attributes to  
3 Mr. abu Faris in his discussions at the convention  
4 starting on the third line that he said "there is only  
5 one way to liberate Palestine and Al-Aqsa, and that is  
6 the fighting, that is the Jihad, that is the  
7 slaughtering, that is the butchering, call it dialogue."

8 My question to you, sir, is can you tell me  
9 whether or not that is an accurate excerpt from the  
10 statements made by Mr. abu Faris during his statements  
11 at the IAP convention?

12 A I did not see what he said. I did not hear him  
13 say these things either. So if he said it, he must said  
14 it when I was not available or was not present at these  
15 things, but I don't remember any of these things.

16 Q Okay. But from your perspective, you can't  
17 confirm or deny these particular statements?

18 A No, I can't confirm or deny, because I don't  
19 remember what he said.

20 Q That's fine. In reference to the 1997 IAP  
21 annual convention, Mr. Emerson refers on Page 99 to a  
22 Jordanian by the name of Ahmed al-Kufahi?

23 A Kufahi, Yes.

24 Q Kufahi. Was Mr. al-Kufahi in fact a speaker at

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1 the 1997 convention?

2 A Yes, he was speaker in several conventions, yes.

3 Q All right. And is he also a member of the  
4 Islamic Action Front political party?

5 A When we invite him, I really don't care  
6 affiliation. I know he was part of the parliament of  
7 Jordan when we invited him. But his affiliation is  
8 political or is -- I'm not really -- I don't get  
9 involved with these things.

10 Q Okay. So you don't know whether he was part of  
11 it or not?

12 A He could be. I don't get involved with him to  
13 ask him if he is or he is not.

14 Q Okay.

15 A Possibly he's probably -- if he is, would be  
16 public records, but I don't go into it myself personally  
17 if he is or is not. That's not what the criteria when  
18 we invite speakers. That's what I'm trying to say. The  
19 criteria of that is he has the ability to speak, and he  
20 has the knowledge, and he's respected leader.

21 Q Okay. If you'd look in the middle of Page 99,  
22 there's a blocked text there which are statements that  
23 Mr. Emerson attributes to Mr. al-Kufahi, and I'd like  
24 you to just take a minute if you would to read through

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1 those and see whether or not you can confirm or deny  
2 that those statements were made at the 1997 IAP annual  
3 convention?

4 A What he is stating here that this is an Islamic  
5 understanding all over Islam. Yes, that's what he said.  
6 My knowledge of Islam is limited as it is, but this is,  
7 yes, it is.

8 Q Okay.

9 A I don't know if he said it or not but this --  
10 this is a fact about Islamic understanding, which that's  
11 universal I think when somebody occupy your land, you  
12 have to take up arms -- you have the right actually,  
13 this is charter even allows that to take up arms against  
14 your occupiers.

15 Q Okay. Turn to Page 100. With respect to the  
16 1999 annual conference, Mr. Emerson identifies an  
17 individual by the name of Salah Sultan as a speaker.  
18 Are you familiar with Mr. Sultan?

19 A Yes.

20 Q Did he in fact speak at the 1999 IAP annual  
21 conference?

22 A Yes.

23 Q Do you recall whether he delivered the Friday  
24 prayer sermon?

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1 A Yes.

2 Q Yes, he did?

3 A Yes, he did.

4 Q At the bottom of that paragraph, Mr. Emerson  
5 attributes the following statement to Mr. Sultan, "I  
6 want every child to sleep on the wound of Palestine and  
7 the actions of martyrdom, just like that mother in the  
8 country whose son wrote to her that they are to meet in  
9 Paradise. Can you tell me, confirm or deny as to  
10 whether or not that is an accurate recitation of what  
11 Mr. Sultan said at the 1999 IAP conference?

12 A I don't remember this. First of all, the sermon  
13 was in Arabic. I don't know if this is a true  
14 translation. I don't even remember what he said in  
15 Arabic either.

16 Q Okay. Next paragraph down, Mr. Emerson  
17 identifies Jordnian Sheikh Ahmed al-Kufahi who we  
18 already talked about before, correct?

19 A Yes.

20 Q Okay. And he attributes to Mr. al-Kufahi as the  
21 statement quote, "Jews are the enemies of humanity even  
22 before they are the enemies of Muslims, therefore it is  
23 necessary to remove them from power." Can you confirm  
24 or deny whether or not those are statements that were

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1 made or translation of statements that were made by  
2 Mr. Al-Kufahi?

3 A Again, Mr. al-Kufahi does not speak English. He  
4 never spoke in English, and I doubt it very much if he  
5 would make such a statement like that. He's not -- I  
6 don't think will ever make a statement like this. This  
7 must have been somebody put words and took it out of  
8 context and translated the way it is, which, that's  
9 again, that's the kind of Emerson we are used to that he  
10 will take things and lie and put them in and interpret  
11 them and let people, you know, let the chips fall where  
12 they may. And this is part of his pattern. So I would  
13 be more inclined to say he never said that in Arabic or  
14 English.

15 Q Okay. You'd be inclined -- I guess my question  
16 is do you recall his statements well enough to be able  
17 to say that you know he didn't say that?

18 A Well, I don't remember everything said.  
19 Actually, I don't remember anything said in the  
20 conferences.

21 Q Okay.

22 A Because that's too far, and I can't remember  
23 what I had lunch today even. But knowing this man, I  
24 know al-Kufahi more than anybody else we talked about,

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1 because he comes here often, and I talk to him, and I  
2 sit down with him. And I know of his thinking. I know  
3 of his attitude and how he thinks, and he would never  
4 make such a statement. That's what I'm saying.

5 But what he said, how translated what did he  
6 say, I don't remember, but I know that very much I would  
7 say that he would never say something like that to this  
8 extent or to this saying. Somebody must have taken it,  
9 and I am positive that Emerson took it out of context,  
10 and he put it in his own words to incite hate against  
11 Muslims, which that's his passion. This is his way --  
12 they way he wants to love. He considers himself  
13 crusaders, anti-Muslims and anti-Arabs and that's -- he  
14 took it upon himself, him and (inaudible) are two people  
15 that are known, and they are mad, and they don't even  
16 hide it.

17 Q All right. The last one I wanted to ask you  
18 about. There's a reference to the 2000 IAP Annual  
19 Conference at the bottom of Page 100, and in particular  
20 a reference to Mr. Jamal Said who is I understand it is  
21 a involved down in Bridgeview, is that correct?

22 A Yes.

23 Q And did Mr. Said in fact make statements or  
24 presentation of some sort during the 2000 IAP

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1 conference?

2 A He was in every conference. He was part of it.

3 Q The statement that is attributed to Mr. Said is,  
4 "I appeal to you on this night that is ushering in the  
5 holy month of Ramadan, to be generous and give plenty,  
6 to keep the light in the houses of our martyrs burning.  
7 We have boxes here that say "Help us help the Aqsa  
8 cause, Islamic Association for Palestine." We want you  
9 to fill those boxes. There is no better charity than to  
10 pay for the family of a martyr."

11 Can you confirm or deny whether or not those  
12 statements were made by Mr. Said during the 2000  
13 conference?

14 A Again, like I say, I don't remember verbatim  
15 what everybody said, but is this kind of logical  
16 thinking or something that people will say when they  
17 want to raise funds, and is it true that charities go to  
18 people who are considered martyrs, yes, and Muslims,  
19 they should do that.

20 Do the people consider helping before Ramadan,  
21 is it something that is good, yes, that's possible. But  
22 did he say these things, I don't know. I don't  
23 remember. I don't recall. I don't know if this  
24 translation -- again if he probably said anything,

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1 probably mostly in Arabic, and I don't think this is  
2 probably true translation, but he will encourage people  
3 to raise funds for the cause of Palestine and the IAP.

4 Q Now, we talked a little bit about an IAP  
5 National convention in 1989 in Kansas City, and I've  
6 told you that that was what we saw in the videotape. Do  
7 you recall attending a conference in Kansas City put on  
8 by IAP and perhaps others in 1990?

9 A I was once in Kansas City, but I don't know if  
10 it was '89 or 90. I really don't remember.

11 Q When you were in Kansas City on that one event,  
12 was it to attend a conference or a convention?

13 A Yeah, to attend the conferences.

14 Q Do you recall who sponsored the conference that  
15 you attended in Kansas City?

16 A To my understanding that -- my understanding was  
17 the MAYA.

18 Q Was that the -- Strike that.

19 When you attended this conference, was your  
20 role simply as a attendee or did you have some other  
21 capacity that you went in?

22 A My role was a family man that he took his family  
23 to see something and be educated about and have a good  
24 time.

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1 Q Do you recall any of the people who spoke at the  
2 conference that you attended in Kansas City?

3 A I remember the names, like I said, al-Qattan who  
4 was there, because I remember, because I think to my  
5 recollection he led the Friday prayer. So because this  
6 is a mosque, every man has to attend as a Muslim. It's  
7 obligatory. So I did that. Because like I said, the  
8 way I do it, you know, personally, we just go certain  
9 sometimes hear speak for 10, 15 minutes here, 10, 15  
10 minutes there and go out. And sometimes we go out to  
11 eat or shopping or take the kids and wife to different  
12 places. It's a vacation. We treat it as a vacation  
13 really.

14 Q So as you sit here today, though, other than  
15 Mr. al-Qattan, you don't have any specific recollection  
16 of who spoke?

17 A I don't remember specifically but, you know,  
18 like I say, al-Qattan, because he delivered the Friday  
19 sermon.

20 Q Do you recall ever attending a conference in  
21 Kansas City in which Abu Marzook spoke?

22 A I don't remember hearing the name Abu Marzook  
23 until really it brought up, like I said, late, you know,  
24 even 90's when he start talking about these things, the

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1 allegations about him. I did not hear about him. I did  
2 not know him before. I did not even hear about him  
3 before.

4 Q Mr. Jaber --

5 A Can I get some water?

6 Q You want to take a short break?

7 A I just want to get some water.

8 Q Okay. Mr. Jaber, going back, the conference  
9 that you recall attending in Kansas City, do you recall  
10 whether Omar Ahmad was at the conference that you  
11 attended?

12 A I didn't get to know Omar Ahmad until probably  
13 mid-90's. I don't know of him even. I didn't even know  
14 him then. I think that's a new, you know, introduced at  
15 one point I think Jasser Bushnaq as president, president  
16 of IAP, because of course these things I knew of him as  
17 president, you know, because as a matter of fact,  
18 personally I did not meet him probably until that time,  
19 you know, face to face. But I don't even remember  
20 knowing Omar.

21 Q When I asked you earlier about the annual  
22 Intifada celebration committees that you worked with, I  
23 think your testimony was that you had dealt with either  
24 Omar Ahmad or Jasser Bushnaq?

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1 A Omar Ahmad took over for Jasser Bushnaq. That's  
2 when I got to know him. But before that, I did not know  
3 him.

4 Q Okay. And do you recall when it was that  
5 Omar Ahmad took over?

6 A I don't know, probably mid-90's, I think.  
7 Really, I'm not sure.

8 Q Well, '96, we know that you took over as the  
9 head?

10 A I took from him. I know that '95 he was there.  
11 But before that, I did not know really who was the  
12 president. I did not think. I didn't ask about it even  
13 when we did the conventions -- I mean the festivities,  
14 you know, just becomes an annual event. We do it. We  
15 don't care. I don't remember dealing with, you know.  
16 was the president or was not president or something.

17 Q Okay.

18 (Document marked as Exhibit No. 49 for ID.)

19 Q Exhibit 49 is a multi-page document, and it's  
20 one you may or may not have seen. I just want to ask  
21 you about some statements that are attributed to an  
22 individual by the name of Nasser Hidre and see whether  
23 they are consistent with something you're aware of or  
24 not, and in particular, looking at the first page, the

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1 bottom paragraph talks about events that took place in  
2 1990, do you see that?

3 A August 1990.

4 Q And four lines down he starts off talking about  
5 that in October of '90, Salah called him and told him  
6 about an Islamic conference going on in December 1990 at  
7 the invitation of MAYA. Do you recall ever attending --  
8 I think you had testified that the conference you  
9 attended in Kansas City was a MAYA conference, correct?

10 A Right.

11 Q And he says that the conference a couple lines  
12 down was in Kansas City, do you see that?

13 A Yes.

14 Q And he says that Mohammed Salah collected  
15 youths, and me among them, for secret meetings of the  
16 Hamas Organization in the hall in one of the hotels.  
17 And in this meeting, spoke to us Muhammad Salah and  
18 Ibrahim Muzayyin, about 50, from Gaza originally, and  
19 they told us that they were there that we had been  
20 chosen for this secret meeting because we were residents  
21 of the territories and had been chosen -- it looks like  
22 there's a letter missing -- as to carry out operations  
23 for the escalation of the Intifada and the framework of  
24 the Hamas Organization. And it goes on.

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1 My question to you is were you aware at any  
2 conference you ever attended of something of this nature  
3 taking place?

4 A Well, first I think this is translation of the  
5 Hebrew thing. So I don't know if this translation is  
6 correct or not.

7 Q I understand. But as it says here, as it's  
8 written?

9 A I don't know who's Jasser Hidre. I don't know  
10 about something that took place like that. I'm not  
11 aware of anything ever took place whether in 1990 or  
12 before or after.

13 Q Okay. So you're not aware at any conference  
14 you've attended of something of the nature that's  
15 described on this page that I just read taking place?

16 A No, not in 1990, not before, not after, not to  
17 date. Not to date. I don't remember ever that taking  
18 place.

19 Q Are you aware of the meeting that took place in  
20 October of 1993 in Philadelphia among leaders of various  
21 islamic organizations?

22 A I think you asked me this question last  
23 deposition, and my answer is still the same, I did not  
24 know about it until I read about it.

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Q Okay. So you never had discussions with Omar Ahmad or anybody else about attending such a conference?

A No, it never took place.

Q To your knowledge, has IAP or AMS ever provided financial support to Hamas?

A No, never.

Q To your knowledge, has IAP National ever provided financial support to Hamas?

A Not under my leadership.

Q What about before your leadership?

A I don't know about that. I told you I cannot answer for something that I have no knowledge of.

Q Are you aware of IAP National or any of the entities operating with IAP National publishing Hamas press releases or communiques?

A Not when I was the leader.

Q And prior to being a leader, you don't know one way or the other?

A I don't know one way or the other. I don't know who published them.

Q I'll show you a handful of documents which you may or may not have seen, but only one way to find out for sure.

(Document marked as Exhibit No. 50 for ID.)

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Q Mr. Jaber, you've been handed what's been marked as Exhibit 50. It's a multi-page document in Arabic -- or principally in Arabic. Can you tell me first of all is this a document you've ever seen before?

A No. This is the first time I seen it.

Q What is the -- at the top you'll see there's the Islamic Association for Palestine logo that we talked about in connection with the videotape, correct?

A Yes.

Q To the left of that there's some Arabic, does that in fact say Ilafilastine?

A Yes.

Q Can you tell me what the translation of the title of this document is on the first page?

A Which part?

Q Well, there's two lines of text above the picture in Arabic with a line between them?

A The large font you're talking about?

Q Yes, the large font?

A They said about Palestinian state. That's the first one top. And this says here field visits to the martyrs' families.

Q Above those two lines of larger font, there's a date, is there not?

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A Yes.

Q And would that date, is that December of 1988 and January 1989?

A Yes.

Q The last page of this exhibit includes some English text in which it's requested that donations be sent to the occupied land fund, do you see that?

A Yes, I see.

Q Were you familiar with any requests by Islamic Association for Palestine to donate to the Occupied Land Fund in or around this time frame, December '88, January 1989?

A Not on this particular application, because I've never seen it before. Like I said before, the events that we held that we always, the funds were raised to the Occupied Land Fund to support the needy people in Palestine.

Q On the last page right above the request for the solicitation, there's a solid line there, do you see that?

A Just right after?

Q Right, right above the English text, there's a solid line, and then just above that to the left there's some Arabic texts that's a little bit darker font?

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A Like signature you're talking about?

Q Yes. Can you tell me what that signature is?

A It says (inaudible) Hamas.

Q Okay. So that is the signature of Hamas?

A That's what it reads.

Q Okay. That's all I'm asking. But it reads Hamas?

A It reads Hamas, yes.

Q Okay. I'm told we only have a couple of minutes of videotape left. So why don't we take a short break and change tapes.

THE VIDEOGRAPHER: Going off the record at 3:30 p.m. at the conclusion of Tape 2 in the deposition of Rafeeq Jaber.

(Whereupon, a brief recess was taken.)

THE VIDEOGRAPHER: Going back on the record at 2:35 p.m. at the beginning of Tape 3 in the deposition of Rafeeq Jaber. Please proceed.

MR. HOFFMAN: Q Mr. Jaber, looking again at Exhibit 50, if you turn to the second page, there appears to be at the top there's some Arabic text about four lines of text that appear to be something along the lines of a title or a caption. Could you translate that for me?

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A This is a document for history from Hamas. It's directed or addressed to the Palestinian National Council meeting the 19th meeting or the 19th conference.

Q And is there in fact a section of this then text underneath it where Hamas sets out its positions and enumerated positions, first, second, et cetera?

A I did not read it. I don't see it. Not on the first page. It says talking about Israel, about establishment.

Q On the second page there's a heading -- there's two sections there with it looks like a bold thick underline where there's some Arabic writing, do you see those?

A The right or the left?

Q There's one on the right and one on the left, correct?

A Yes.

Q What does the one on the right translate to?

A I would say that's our principals.

Q Okay. And there are then numbered paragraphs after that, first, second, third, fourth, et cetera?

A Yes, it says first in writing, alphabetical thing.

Q Right, not the numerals, but the words?

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A Yes.

Q Okay. The fourth paragraph, the one that's identified with the word -- the Arabic word for fourth, does that state in it translated roughly that Hamas affirms its rejection of all political positions calling for negotiations with the enemy and occupant?

A That's not what it says there.

Q What does it say in the fourth, how would you translate that?

A It says that the Arab world, the Islamic world are the strategic depth and the backup of the, you know, to our movement against the enemy and the liberation of Palestine is the utmost objective of the Islamic world.

Q What is the underlying text on the left-hand column, what does that translate to?

A That's our stance, it seems like it.

Q Are there also then enumerated paragraphs as there were in the other section first, second, et cetera?

A Yes.

Q Could you tell me what the third enumerated paragraph translates to?

A Where it says third?

Q Yes.

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A It says Hamas will try -- will Hamas wants to reiterate that its complete commitment to the unity of the people against the savage attack of Zionism, again reiterate its refusal and its fighting against the enemy.

Q I'm sorry. Go ahead?

A To the enemy's plans to have us fight each other, something like that. So Hamas will call on all people to have the same standing which means they're talking paraphrase here not to fall into these plans of the enemy's plans to have like a civil war. It's willing to, you know, to work whoever for the liberation of Palestine.

Q Does the Arabic word Jihad appear anywhere in that?

A So far I did not see it. I don't know.

Q Is there any reference in that third paragraph to what have commonly been referred to in the media as suicide attack or suicide operations?

A No, not on third. I didn't see that.

Q What about in the fourth?

A On fourth, again, it says Hamas movement would like to ascertain its refusal to all the compromises to the occupation -- to occupying enemy or to recognize it

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or to live with it or to compromise any part of Palestine.

Q Okay.

A And it goes on and says those people who do it is not right.

Q If I could take you back for just a minute over to the first column, the column on the right that we talked about before?

A Hm-hm.

Q Could you tell me what the paragraph labeled third says?

A The only way to liberate for Palestine is Jihad and should be no -- any time should we ever abandon Jihad.

Q Could you do me a favor, could you circle --

A Why don't have somebody to translate for you professionally so you can read it. But I don't know what that has to do with me. I mean this is wasting of my time, really. I don't see anything that has to do with the IAP. I mean Hamas' name, everybody knows what it stands. I mean it's not a discovery here that Hamas has certain, you know, principals that it stands for, but this is a waste of my time really. But I don't see really anything that has to do with the case with IAP or

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me personally to do with it, because not talking about Hamas, not talking about us or -- if you want to translate I think would be better off to get professional translator. First of all, I'm translating to the best of my ability fast, and I could be making mistakes and not be probably fair to anyone you know.

That's why I prefer these documents to bring them, like I said, translated, and I can tell you if the translation is correct or not. But to give you my translation that could be taken out of context, it could be misunderstood as saying that I'm saying this or saying this is a fact. Again, I'm not professional translator or interpreter. I'm doing the best I can with the time frame, you know. I have to think about some of these words, because I have to switch from thinking English to thinking Arabic. It's not an easy thing to do. That's why there's official interpreters for these kind of things.

That's why I appreciate it really if it has to do with me or with the IAP, I'll be glad to go over it and discuss it. But if it has nothing to do with me, this is like, you know, saying what Hamas stands for. I see it as a waste of time.

Q Mr. Jaber, we're talking about a document that

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was published by the Islamic Association for Palestine?

A Not my association.

Q And I am asking you -- I believe you've indicated you're fluent in Arabic. And I am asking you, the paragraph that you just read in the right column, the one marked third, if you would circle the word Jihad in Arabic. Thank you. If you turn to the next page --

A I'm going to change every time I'm going to start translating.

Q If you turn to the next page, there is again on the bottom left-hand corner the same what we've identified as the signature of Hamas, am I correct?

A That's what it seems.

Q That's what it says?

A It says -- different signature or it says Hamas, Islamic Hamas. That's what it says.

Q All right. The name Hamas?

A Signature. I don't know.

Q It certainly is the name Hamas, correct?

A Yes.

Q Okay. You can put that document aside.

(Document marked as Exhibit No. 51 for ID.)

Q Mr. Jaber, you've been handed what's been marked as Exhibit 51. And it's a multi-page document. Have

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you ever seen this document before, sir?

A Yes, I did.

Q When did you see this document?

A A long time ago.

Q What is this?

A This is supposedly the charter of Hamas.

Q In what context did you first see this document?

A Like I told you, whenever I find something in the stores or something like that has to do with Palestine, I pick it up, and I read it. And I pick up all kinds of charters and all kind of statements made by all people concerned whether from the Israeli side or from the Palestinian side, and I read it. I like to know about it.

Q Now, we again see on the front page of this document we see a map similar to the one that was on the video?

A Yeah, that's the Palestinian map. Yes.

Q Okay. And does this Arabic text again talk about Palestine from the sea to the river?

A I don't know. It doesn't say that, not on the front.

Q Okay. What does the front page then say?

A This is the charter of the Islamic -- the

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charter of the Islamic movement Hamas.

Q Okay. Do you have any knowledge or understanding about who published this charter?

A No, I don't care really who published it. I didn't care.

Q I'm not asking whether you care?

A That's what I'm saying. I didn't care to know who published it or who wrote it.

Q Okay. I'm not going to make you go through all of this, but there does seem to be on the first two pages, there seems to be a date?

A Yes.

Q With the map. What is the date?

A That's August 18th, 1988.

Q If you turn to the third page from the back; there are a series of addresses in English with some Arabic text to the right, do you see that?

A Yes.

Q There's also the IAP logo in the bottom right-hand corner that we saw both on the video and in Exhibit No. 50, correct?

A Yes.

Q Now, these IAP addresses are for locations in Tucson, Arizona, and Culver City, California. Are you

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1 If this building fall on us, we are considered  
2 martyr. Because we are part of doing something  
3 considered Jihad. So if I'm dead now by this building  
4 falling on me, I'm a martyr. If I go here and somebody  
5 drown in the lake, I'm a martyr.

6 Q Now, Mr. Jaber, in fairness, would you agree  
7 with me that there are Muslims in this world who have  
8 used those terms in a less innocuous way than you're  
9 using them now?

10 A Also can be used in those terms, too, but, you  
11 know, that term when somebody defending his land,  
12 defending his home, defending his property, defending  
13 his family, and he dies in the process, he's a martyr,  
14 of course. But that doesn't mean he's not excluded to  
15 this kind of things. No Jihad excluded for the one who,  
16 yes, fighting against the enemy is Jihad. But it's not  
17 Jihad exclusively used for fighting just against  
18 Israelis or Jews. You know, because that's the meanings  
19 that was trying to be twisted here by designist and by  
20 supporters of Israel to give the word Jihad a bad  
21 meaning when it's a beautiful word. Actually it means  
22 self fulfillment, struggle against anything wrong,  
23 anything, including if you do something wrong, and you  
24 struggle to hide it, I mean to get rid of it, if you

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1 cheat on your wife, and you struggle to do it, Jihad. I  
2 try to explain that point.

3 Q All right. Let me move on if we could. The  
4 second full paragraph, fourth line down says, "he has  
5 permitted you to combat the enemies of humanity"?

6 A I'm not following where you at.

7 Q I'm sorry. The second full paragraph of text,  
8 the one that starts our Palestinian people?

9 A On the 27th of Rajab?

10 Q The paragraph above that, our Palestinian  
11 people?

12 A Okay.

13 Q Fourth line towards the end on the right starts  
14 he has permitted you to combat the enemies of humanity.  
15 The blood-suckers. Killers of the profits. And Allah  
16 has honored you by making you a spearhead defending the  
17 sacred places until Allah opens the door permitting  
18 those thirsty for Jihad all over the world. For the  
19 sake of Allah. For liberating the land of Palestine and  
20 Jerusalem.

21 My question to you is have you heard or seen  
22 rhetoric of this type seen with IAP publications?

23 A No. This is first time I seen something like  
24 this.

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1 Q Would you agree with me that the tone and tenor  
2 of that is not consistent with the more innocuous  
3 definitions of Jihad and martyrdom that you described  
4 earlier?

5 A I don't know what the intentions of this was, if  
6 this is the true or the original even document, you  
7 know, how it came about, all this, how it came about. I  
8 have no idea about it. But like, again, it could be  
9 use -- the word of Jihad could be used by anybody the  
10 way they wanted to use it. Nobody has complete control.

11 (Document marked as Exhibit No. 53 for ID.)

12 Q Mr. Jaber, you've been handed what's been marked  
13 as exhibit 53. This is another document again indicates  
14 that it's got the IAP logo, and it says Islamic  
15 Association for Palestine at the top. My first question  
16 to you is whether you've ever seen this document before?

17 A No.

18 Q Are you able from the reference to the second  
19 year of Intifada to place the time of this document?

20 A It would be probably '89 or 6. Something like  
21 that.

22 Q If you look at the second page, would you agree  
23 with me that at the bottom there it seems to indicate  
24 that whether it's a signature, but it's got the

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1 reference to the source being the Islamic Resistance  
2 Movement Hamas at the bottom?

3 A That's what it says there. I don't know where  
4 it came from.

5 Q Now, have you ever been aware of IAP, IAP  
6 National, publishing Hamas communiques or statements in  
7 the United States?

8 A Not on my leadership.

9 Q Are you aware of it happening prior to your  
10 leadership and your dealings with IAP National?

11 A I don't remember any of that. I don't recall  
12 it. I don't know if that happened or not.

13 Q Do you remember ever seeing when you talked  
14 about how you pick up things to read all the time, do  
15 you ever recall picking up something that IAP published  
16 that was a Hamas communique?

17 A Could have. I don't remember. I don't recall.  
18 (Document marked as Exhibit No. 54 for ID.)

19 Q Mr. Jaber, you've been handed what's been marked  
20 as Exhibit 54. This is a document in Arabic --  
21 principally in Arabic. There is, again, however in  
22 English at the top it says Islamic Association for  
23 Palestine with the IAP logo we've seen several times  
24 now, correct?

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A Yes.

Q Below the IAP logo is what I believe is a reference to the timing of when this was released, is that correct?

A Yes.

Q And what does that indicate to you?

A That's the commemoration of the 1967 war.

Q And the document here if you look at the second page at the bottom, somebody has put in here translation in English, but is their translation accurate that the text in the bolder font is the name of Hamas?

A Yes, but not -- again, this is not my -- not the IAP I am in charge of or I've been in charge of. I don't know if this is existed the IAP what they did. That's a different story altogether, but let's make it clear that it has nothing to do with the IAP that I've been involved with and IAP that I'm a leader of.

Q Are you able to place this document in time in terms of when it was created?

A It should be just about the same thing about says at the time of second year of the Intifada. Should be, again, about 1989 should be somewhere. Actually it says here May 28th of 1989.

Q Okay. And at that time you were -- your

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involvement with IAP was limited to the committees that you described working on in connection with the celebration of the anniversary of the Intifada, correct?

A Yes.

Q And possibly some other events?

A Possibly, but I don't remember.

Q Do you recall seeing Arabic statements such as this from Hamas that were published by IAP during the time frame of the late 1980's or early 1990's?

A I may have, but like I say, I don't remember in particular. I seen all kind of statements which is very similar actually in nature of the saying and so forth from all the factions of the Palestinian people that led the Intifada.

Q And to the best of your recollection in this time frame, roughly 1989, Jasser Bushnaq was the head of IAP National?

A I don't know. Possible.

Q Well, I think you had testified that the people you dealt with in connection with the committees you were on were either Jasser Bushnaq or Omar Ahmad?

A That's were the people that I dealt with. I mean for particular who was president and who was the board, all these things, I never cared to investigate or

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find out.

Q Are you aware of any point in time in which IAP National actively supported the Hamas agenda?

A Not I ever know of. Not I know of. I don't believe that they do that even, you know, at least from my -- from whenever I took over. It was actually I asked that question even, do we support any faction in particular, because I don't believe in supporting any faction in particular in Palestine to work here, because that's not our business to have factions. That's my philosophy. They said no, just do whatever to support the cause. I said if you support the cause, then I'll be glad to take over. But rather than that, not to be tied with any faction in particular where Hamas or Jihad or PLO, ever that's to me, it does not make sense, because we are American. In America we support the cause as a whole and as a total. Sometimes geologically this is right and this person right, but that becomes an individual preference.

(Document marked as Exhibit No. 55 for ID.)

Q Mr. Jaber, you've been handed what's been marked as Exhibit 55. This is a document predominately in Arabic, but it does appear to be issued by the Islamic Association for Palestine at the top, would you agree

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with that?

A Yes.

Q The bottom on the left-hand corner there's a date in Arabic?

A Yes. December 1, '89.

Q Towards the bottom of the page, there's a reference to the Occupied Land Fund, do you see that?

A Hm-hm. Yes, I see.

Q Is this reference to Occupied Land Fund part of a solicitation for persons to provide support to Occupied Land Fund?

A Well, that's what it seems from this, but like I said, we always believe the best way to raise funds for the needy people through an organization that specialize in that and that Occupied Land Fund was the vehicle that was trustworthy to get the money to the people that were the least expenses and the least taken away from it.

Q I just want to make sure we're clear. This was in 1989, were you involved in the preparation of this solicitation?

A No. Like I said, I'm not talking about this particular.

Q Okay.

A That's why I made it clear.

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Q All right. So on this particular document, you don't know what the rationale or how it came to be that they're asking for money to be given to the Occupied Land Fund?

A No, not in particular, but in general that's how they, you know, we did work.

Q And that was how it worked when you've been in charge of IAP?

A Yes.

Q But you don't have any personal knowledge as to what decision making processes were involved by the leaders of IAP National in the late 80's and early 90's, do you?

A No.

(Document marked as Exhibit No. 56 for ID.)

Q Mr. Jaber, you've been handed a document that's been marked as Exhibit 56, something a little bit more current. This document is dated August 30, 2001. Do you recognize this as an editorial that was sent out to various people by the Islamic Association for Palestine?

A By writer named Khalid Amayreh says there that the association is published.

Q Okay. But the association is published and sent around, correct?

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A When you publish anything does not mean I agree or disagree with the opinions. Even I don't know what it says, but to clear that up.

Q Okay.

A Okay. That's the writer's opinion, and we publish all kind of opinions.

Q Okay. Well, let's turn if you could to the second page. There's a paragraph that starts first of all, do you see that?

A Yes.

Q And in the second sentence, the author says Sharon, et al, needless to say, offers us two choices, either to be killed like meek sheep, or be martyrs in martyrdom operations against the oppressors. And we will not allow ourselves to be killed like meek sheep.

Continuing on to the next paragraph, therefore, for the sake of our children, and in order not to allow Sharon and other Zionist criminals to enjoy the outcome of their blitz, we have no choice but to meet death with death. Sadly, this is the only language the Jewish Nazis understand. If their people don't get killed, not a Palestinian man, woman, child or leader will be immuned from their death squads and state terror. Is that a position that is consistent with the views of the

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IAP?

A No. Like I said, this is his opinion.

Q I'm asking you whether it's one you've adopted?

A Our mission and our position is that we'd like to seek a comprehensive and just solution to the cause.

Q Do you view this -- the views -- are the views that are set out here by Mr. Amayreh consistent with what you believe is a resolution of a just and comprehensive solution?

A No. Resolution to negotiate everything from A to Z with all, you know, everything set on the table up front as I explained it to you earlier.

Q I recall?

A That has not changed I mean from morning to this afternoon.

Q No. I understand. Is it your testimony then that what he is saying here is inconsistent with the views of the IAP?

A Yes. We don't advocate any violence or advocate -- we are not with or against, because that's not our position. The people outside Palestine, they can make whatever decisions they make. We don't know what situation they are in. But our position always we'd like to see a comprehensive solution and a just

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one. Of course without justice, there can be no peace.

Q With this editorial, was this also included on the IAP website?

A That seems like coming from the web, I think.

Q And the author, who is he, Mr. Amayreh?

A He's a journalist, writes from Palestine. He's living the things that he has his own opinion what he thinks is right or not.

Q Is he in any way compensated by IAP for the materials that IAP publishes?

A Yes. He send us articles, and he send us news, and we pay him for that, yes.

(Document marked as Exhibit No. 57 for ID.)

Q Mr. Jaber, you've been handed what's been marked as Exhibit 57. This is a document at the top appears to be dated September 6, 2001. Would you agree with that?

A Yes.

Q Is this also something that was published and circulated by the Islamic Association for Palestine?

A It seems like it, yes.

Q Now, in this time frame, we're talking about your IAP?

A Yes.

Q And you see that there are numerous references

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1 in the first page here to martyrdom operations or martyr  
2 bombers?

3 A Yes.

4 Q Do you have an understanding of what the author  
5 means when he's referring to those martyrdom operations  
6 or martyr bombers?

7 A So called here the suicide bombing. That's what  
8 they refer to.

9 Q And in this instance, would you agree with me  
10 that martyr or martyrdom as it's used in this particular  
11 instance is not the same innocuous interpretation that  
12 you had indicated could be used for martyr?

13 A That could be used. That's part of people can  
14 use that.

15 Q In fact this author is using the term in  
16 connection with acts in which civilians possibly are  
17 killed through explosions or other acts of violence,  
18 correct?

19 A I don't see it. I don't know what you're  
20 talking about. But martyr obviously is known with these  
21 quote-unquote suicide bomb attacks. Always civilians  
22 get killed.

23 Q Are the views -- first of all, who's the author  
24 of this document?

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1 A This is the news like see a quotation from  
2 different people it seems like here, quoting different  
3 people what they say and what they think about it.

4 Q Somebody had to write all of this and assemble  
5 it, pull this news together, who was that?

6 A That would be probably the person who was in  
7 charge of the web page.

8 Q And that's who, Sean Smith?

9 A Sean Smith, yes.

10 Q This news report that Mr. Smith put together, do  
11 you view it as being consistent with IAP's philosophies?

12 A The news has nothing to do with the philosophy  
13 of the person. Like Tribune when they put some news,  
14 doesn't necessarily have to agree with the philosophy of  
15 the Tribune. Or sometimes when ABC brings the news,  
16 bring about suicide bombing, all kind of killings and  
17 violence, but that doesn't mean that the ABC in any way  
18 shape that this is their philosophy. News are news.  
19 The philosophy of someone saying this is what I believe,  
20 and this is what I want, and this is my way of life.

21 Q Let me ask you this. Is it consistent with the  
22 philosophy of IAP that people who engage in suicide bomb  
23 attacks are martyrs?

24 A There's a lot of people called martyrs, yes, but

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1 that doesn't mean -- with us we don't have a stand one  
2 way or another, because that's in my philosophy and my  
3 beliefs, we should not take a stand either way. Always  
4 I don't have a stand with it. People they have to  
5 decide that for themselves. But was the word martyrdom  
6 used, yes. It's used by 99 percent of the Palestinians.  
7 They use it as martyr. They don't call it suicide  
8 bombing.

9 Q It's your testimony, though, from IAP's  
10 perspective, it doesn't take a position as to whether or  
11 not --

12 A Take a position, you know, about what right or  
13 wrong, because we do not judge. I don't believe we are  
14 in the position to judge the people what they do and  
15 what they do not do. Because the one in the field is  
16 different than the one sitting in the chair like me  
17 here.

18 (Document marked as Exhibit No. 58 for ID.)

19 Q Mr. Jaber, you've been handed what's been marked  
20 as Exhibit 58. This is another document. It's been  
21 dated July 17, 2001, also published by the IAP; is that  
22 correct?

23 A Yes, seems like it.

24 Q Is this another document that you would consider

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1 to be a news article?

2 A Yeah, by Jerusalem July 17, 2001, IAP news. So  
3 that's putting any news.

4 Q Who was it that prepared this particular news  
5 report?

6 A I would assume, again, like I said, probably  
7 would be the one in charge of the web page.

8 Q Sean Smith?

9 A Sean Smith, yes.

10 Q At the end of the first paragraph of text starts  
11 off with the dateline of occupied Jerusalem, do you see  
12 that?

13 A Yeah. Okay.

14 Q He makes reference to Palestinian freedom  
15 fighters who carried out the bombing. Is it consistent  
16 with IAP's philosophy if you will that individuals who  
17 carry out bombings against Israeli targets are freedom  
18 fighters?

19 A Again, this is news. This is what people what  
20 they think and what they say. It's not the standing of  
21 the IAP or the -- that we stand with it. Some probably  
22 the IAP will agree with it. Some disagree with it. We  
23 don't go over and talk about it, but our position is  
24 that the things that go in Palestine, what they are

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called and what they're not called, we don't have position to take.

We are with the just cause of Palestine. Is it a just cause, yes, it is a just cause. We believe in that. Is it Palestine occupied territories. Yes, occupied territories by Israelis. Do the Palestinians suffer terrorism from the Israelis, yes, they do. But do we take a stand how they should fight back or they don't fight back, that's a decision they have to make, because we're not the ones who's going to give the orders or tell them what to do.

Q I'm asking you now a question about a document that was authored by an IAP agent who runs IAP's website and published on IAP's website, a news article authored by Sean Smith, and that's why I'm asking you now whether that characterization that was made by IAP is consistent with IAP policy?

A Again, it's not made by IAP. It's made as news editorial. Himself put it this way in reference to the people how they think about it. He's reflecting what the Palestinians would say about these things. That's why my take into it. Whether he believes that or not, I never asked him.

Q Is it your testimony that when Mr. Smith

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publishes something on the web page or sends it out by e-mail under the name IAP that he is not acting on behalf of IAP?

A Not necessarily. When he sends out the news, it's the news. The news does not represent, because it's the news, does not represent the IAP position. When we send out a statement, that's where we stand. We issue many statements regarding all kind of things, and those are the ones that will be presenting our views, not somebody who writes the views or somebody like that.

(Document marked as Exhibit No. 59 for ID.)

Q Mr. Jaber, another document, this one dated March 29, 2001, again published by IAP; is that correct?

A Yes, the IAP news.

Q This would be both on the web page and through e-mails?

A Yes.

Q This is -- as IAP news this would also then be authored then by Mr. Smith?

A Yes.

Q And what appears to be the title is more Palestinian "living martyrs" swear to "show Jewish Nazis the taste of death." The characterizations that are included in that title, are those consistent in your

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view with the IAP's mission statement or views?

A No, they don't. Again, we don't have any stand as far as these operation what we call them martyrs or call them suicide or what the people again that they call them. That's something they have to do with the people of Palestine. And anybody in the IAP, the IAP, his personal opinion, that's his personal opinion what he stands for, what he thinks it is. But the collective philosophy of the IAP, not to take any position regarding.

As a matter of fact, we've been asked many times what the position of the IA is. We don't have position, but this is martyrdom this is right or wrong. This is personal. If somebody has to do it, has to do with as a personal thing.

Let's say if I wanted to go and say this is what I think of it, then I think of it as a person, not as a president of the IAP. But the IAP has its own position, which is published in the charter, its publications, you know, mission statement.

Q But in fairness, these personal views that you've described are being published to the world on the IAP's web page and by e-mails from the IAP website, correct?

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A But these are quotations. What I'm saying most of what they say these are quotations of people. Not even personal view. Talking about person could have a personal view. Could be contrary to the stand of the IAP. But this here, what you see everything that what he says, he's wording people or sources that they saying these things.

Q Last document.

(Document marked as Exhibit No. 60 for ID.)

Q Mr. Jaber, you've been handed what's been marked as Exhibit 60. This is another document, this one dated March 7, 2002, that was published by IAP, correct?

A Yes.

Q And it's a news article that appeared on the IAP web page and was e-mailed to various subscribers?

A Yes, that's the IAP web page subscribers, yes.

Q Would this also have been then authored by Mr. Sean Smith?

A Yes, I would say so.

Q The title is fresh martyr operation in West Bank, and it indicates in the first paragraph that on Thursday, a Palestinian martyr bomber has blown himself up in the lobby of a hotel at the entrance to the illegal Jewish settlement of Ariel on the West Bank.

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1 Is it fair to say that it's Mr. Smith who has  
2 authored the characterization of martyr bomber, and he's  
3 not quoting anybody in this particular article when he  
4 uses that term?

5 A Like I said, the martyr, if you asked probably  
6 1,000 Palestinian randomly, you will find out about 95  
7 of them will say martyr, they don't call it suicide,  
8 because the definition of suicide is different, you  
9 know, to the martyrdom. So that's common. It's nothing  
10 unusual for people to say to call them martyrs and to  
11 characterize them as martyrs.

12 Q Now, have you given any direction to Mr. Smith  
13 in terms of the content that he puts into the IAP web  
14 page or the e-mails that are sent out from the IAP  
15 website?

16 A Yes. I speak to him, you know. I speak to him  
17 once in a while of course and says whatever, if you put  
18 the news, you quote the people news, and that's what it  
19 is. Our position is this position, he knows what our  
20 position is and where we stand with it.

21 Q What have you told him about the IAP's position?

22 A I told him mission statement. He writes it even  
23 on the bottom most of the time, you see it when the  
24 publication comes in. We published it many times in

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1 some of the, you know, web pages that's what we stand  
2 for. Not on these documents, but many times we publish  
3 it once in a while, you know, what the IAP stands for.  
4 As a matter of fact, we keep revising it based on the  
5 circumstances and based on the developments of the  
6 cases.

7 Q Have you ever had any discussions with Mr. Smith  
8 about trying to present balanced or objective reporting  
9 of news?

10 A In what sense? What's objective and balance?  
11 That's a matter of everybody has a different way of  
12 looking at it, you know.

13 Q I understand.

14 A To him this is objective and balanced. My  
15 philosophy as long as the truth, I don't tell people  
16 what to say. To say the truth, but don't lie, don't say  
17 anything it's not there.

18 Q In your view, is the reporting that we've seen  
19 in these last several exhibits objective and balanced?

20 A Well, it depends why it's objective or not.  
21 This could be argued, I guess, from different  
22 perspectives.

23 Q Well, I'm asking for your perspective?

24 A Like I said, if we agree on the definition of

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1 balance and objective, then we can argue it from that  
2 point. What the definition of objectives and, you know,  
3 then that could be different, because do we get any news  
4 from the Israelis objectives. Only they issue or the  
5 Israeli organization or the Zionist organization in this  
6 country. They don't balance objective, but people say  
7 they are objective, because they are a cause. So we're  
8 not here to promote the Israeli occupation. So if you  
9 ask -- we are not per se the news organization like the  
10 Tribune or the ABC or NBC. We have an agenda like you  
11 said. We have an agenda.

12 We support the Palestinian cause. That's  
13 nothing we never denied. And we believe in the cause,  
14 and we believe in the justice. Why would I want to  
15 promote the Israeli side. That's not my job, because it  
16 has enough money. They already promote 1,000 times at  
17 least if not 1 million times the Israeli cause. I don't  
18 need to give them any more applications to do that.

19 So actually we are the one. So I don't believe  
20 that we should only we have to present what the  
21 Palestinians say so for the people to know what the  
22 Palestinians think and what's going on.

23 Q Have you ever had any discussions with Mr. Smith  
24 in which you have told him either to change the text of

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1 something that he's published or that you disagreed with  
2 how something was characterized in any of the work that  
3 he has put together on the website?

4 A I may have, yes. I may have on occasions, yes.

5 Q Do you recall any specific circumstances?

6 A I always tell him -- my main thing I tell him if  
7 anything has to be quoted, has to be quoted, don't put  
8 in views from your own any news from you that you think  
9 happens unless somebody reported or, you know, got it  
10 from sources that you have, and we don't, you know,  
11 advocate. We don't advocate violence or we don't  
12 encourage violence by any means. That he understands.

13 Q And when do you recall communicating that  
14 particular message to Mr. Smith?

15 A I communicate to him always, you know. I don't  
16 talk to him often as I'd like to probably or I should,  
17 but whenever there is a confrontation, we talk about it  
18 and remind him what our position and what we stand.

19 Q Why don't we go off the record. I want to go  
20 through my notes, but I think I'm done.

21 THE VIDEOGRAPHER: Going off the record at  
22 4:28 p.m.

23 (Whereupon, a brief recess was taken.)

24 THE VIDEOGRAPHER: Going back on the record at

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4:35 p.m. Please proceed.

MR. HOFFMAN: Q Mr. Jaber, I have no further questions. Thank you for your time and your patience.

A Just one thought.

# EXAMINATION

By Mr. Fennerty:

MR. FENNERTY: Q Wait a minute. One question first, Mr. Jaber. You've been shown about five different articles from the IAP website, correct?

A Yes.

Q Okay. And this is over a period of several different years, correct?

A Yes.

Q And in the course of a year, how many articles are published on the IAP website?

A Oh hundreds of them.

Q And out of those hundreds of articles are some of them -- do they all have the same viewpoint?

A Each article is different from the other, you know. Like I said, this is daily thing that goes on going on. Some days we can have ten different articles going on and different things. And some days could be less than that or more, but that's something an ongoing thing.

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So actually this five here does not represent in any way the balance even of the IAP, you know, the publication that we send out on the web page or we put out, you know, in the e-mail. We have -- we get tens of thousands of hits on a daily basis and weekly basis. People are interested to the news and are interested what the other side say around the country.

So if we only just putting five year or two three years, nobody with would be interested to come, you know. As a matter of fact, at one point CNN was linked to us. They used to take news from our web page years ago. And other major organizations they used to take, you know, news from our web page.

Q Okay. Is it your job to censor Mr. Smith on the website?

A I don't believe in censorship. I believe in freedom of speech. I believe in freedom of the press. I do not believe in censorship or anybody whether being Mr. Smith or anybody else, you know, in my organization. On the contrary, I encourage people to speak their minds and their belief even if I disagree with it.

MR. FENNERTY: No further questions.

MR. HOFFMAN: I have no questions.

MR. FENNERTY: We'll reserve signature.

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THE VIDEOGRAPHER: Going off the record at 4:37 p.m. at the conclusion of the deposition of Rafeeq Jaber.

\*\*\*\*\*

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STATE OF ILLINOIS }  
COUNTY OF COOK } ss:

The within and foregoing deposition of the aforementioned witness was taken before SYLVIA A. GERUT, C.S.R. and Notary Public, at the place, date and time aforementioned.

There were present during the taking of the deposition the previously named counsel.

The said witness was first duly sworn and was then examined upon oral interrogatories; the questions and answers were taken down in shorthand by the undersigned, acting as stenographer and Notary Public; and the within and foregoing is a true, accurate and complete record of all of the questions asked of and answers made by the aforementioned witness, at the time and place hereinabove referred to.

The signature of the witness was not waived, and the deposition was submitted, pursuant to Rules 30 (e) and 32 (d) of the Rules of Civil Procedure for the United States District Court, to the deponent per copy of the attached letter.

The undersigned is not interested in the within case, nor of kin or counsel to any of the parties.

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Witness my official signature and seal as  
Notary Public in and for Cook County Illinois on this  
\_\_\_\_\_ day of \_\_\_\_\_, A.D. 2003.

SYLVIA A. GERUT, C.S.R.,  
License No. 084-003757  
Notary Public  
P.O. Box 346  
La Grange, Illinois 60525-0346  
Phone: (708) 588-0283

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

Stanley Boim, Plaintiff,  
-vs-  
Quranic Literacy Institute  
Defendant.

No. 00 C 2905

I, RAFAEQ JABER, being first duly sworn, on  
oath say that I am the deponent in the aforesaid  
deposition taken on August 6, 2003; that I have read the  
foregoing transcript of my deposition, consisting of  
pages 1 through 209 inclusive, and affix my signature to  
same.

RAFAEQ JABER

SUBSCRIBED AND SWORN TO  
before me this \_\_\_\_\_ day of  
A.D. 2003.

Notary Public

SYLVIA GERUT REPORTING, INC.  
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SYLVIA GERUT REPORTING, INC.  
P.O. Box 346  
La Grange, Illinois 60525-0346  
708.588.0283

August 25, 2003

Mr. Rafeeq Jaber c/o: Mr. James Pennerty  
36 S. Wabash, Suite 1310  
Chicago, Illinois 60603

RE: Boim vs. QLI  
CASE NO.: 00 C 2905  
DEP OF: Rafeeq Jaber

Dear Mr. Jaber:

Your continued deposition testimony given on  
August 6, 2003 in the above captioned case has been  
transcribed and inasmuch as signature was not waived,  
this is to advise that the deposition will be available  
in our office for 30 days for reading and signing.

If you choose to read and sign your deposition at  
our offices, please call the undersigned for an  
appointment. Our office hours are from 9:00 a.m. to  
4:00 p.m. Monday through Friday.

If you choose to make other arrangements for the  
reading and signing of your deposition, please advise us  
of the arrangements you have made in writing within 30  
days from the date of this letter.

Sincerely yours,

SYLVIA GERUT REPORTING, INC.

cc: Mr. Richard Hoffman

sg

Job No. SGCR0213

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CASE: Boim vs. QLI DATE TAKEN: 08/06/03

DEPONENT: Rafeeq Jaber

PAGE LINE ERRATA SHEET

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(signed) \_\_\_\_\_ DATE \_\_\_\_\_

Reporter: Sylvia A. Gerut

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