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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

CR 05-60008-02-HO

v.

PIROUZ SEDAGHATY,

**DECLARATION OF COLLEEN
ANDERSON**

Defendant.

In re AL RAJHI BANK SUBPOENA

**AL RAJHI BANKING &
INVESTMENT CORP,
Real party in interest**

Respondent.

I, Colleen Anderson, state that:

1. I am a Special Agent (S/A) with the Internal Revenue Service - Criminal Investigation (IRS-CI), assigned to the Medford, Oregon Post-of-Duty. As a special agent, I investigate possible violations of the Internal Revenue Code (Title 26 United States Code), the Money Laundering Control Act (Title 18 United States Code), and the Bank Secrecy Act (Title 31 United States Code).

2. I have been a special agent with IRS-CI since December 1995 and have conducted and assisted in numerous criminal investigations involving violations of federal tax laws, money laundering laws, and other related offenses where I have gained experience in locating, tracing, and corroborating financial information pertaining to the receipt and disposition of funds. I have been assigned to the Pirouz Sedaghaty investigation since approximately February of 2002.

INVESTIGATIVE RESULTS

3. Through an analysis of bank records and financial documents obtained during the course of this investigation, the investigation has shown that in February of 2000 an individual in Egypt named Mahmoud El-Fiki donated US \$150,000 to the Al-Haramain Islamic Foundation (AHIF). Although AHIF is headquartered in Saudi Arabia, El-Fiki chose to wire the funds to an AHIF account in Oregon at the Bank of America (BOA) on February 24, 2000.

4. Shortly after the funds were received by Oregon AHIF, codefendant Soliman Al-But'he, a Saudi national residing and working for AHIF in Riyadh, flew to Oregon in early March 2000 to retrieve the funds. On March 10, 2000 Al-But'he and defendant Sedaghaty went to the BOA in Ashland, Oregon and withdrew the donated funds by converting the \$150,000 into 130 \$1,000 American Express traveler's checks. The next day the two returned to the bank and purchased a \$21,000 BOA cashier's check made payable to Al-But'he.

5. Al-But'he returned to Saudi Arabia on March 13, 2000. On March 14, 2000, Al-But'he went to an Al-Rajhi Banking and Investment Corp (Al-Rajhi Bank) branch in Saudi Arabia and appears to have cashed the AMEX traveler's checks for currency. For reimbursement, bank records show Al-Rajhi Bank sent the AMEX traveler's checks to one of its US correspondent banks, Chase Manhattan (now JP Morgan Chase) in the US.

6. Al-But'he appears to have deposited the \$21,000 BOA cashier's check into an account at Al-Rajhi, most likely at the same time he cashed the traveler's checks. The account number is 140608010109206 and appears to be a personal account for Soliman Al-But'he. Bank records show that Al-Rajhi Bank processed for payment the cashier's check through another US correspondent bank, US Bank. In turn, bank records show US Bank requested payment of the \$21,000 from BOA on March 30, 2000.

CONCLUSION

7. As a financial investigator, it is clear that the records pertaining to the disposition of the \$130,000 and the \$21,000 would be maintained by Al-Rajhi Bank, who processed the instruments through its US correspondent accounts with JP Morgan Chase and US Bank. A review of the Clearing House Interbank Payment Systems (CHIPS) website, www.chips.org, shows Al-Rajhi Banking and Investment Corp still utilizes JPMorgan

Chase Bank to process financial instruments through the US banking systems. As of January 27, 2010, the website shows US Bank no longer appears to be an active correspondent account for Al-Rajhi Bank.

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

Executed on January 28, 2010.



Colleen Anderson
Special Agent, IRS-CI