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1 DEPOSITION OF
KIFAH MUSTAPHA

2

3 EXAMINATION BY: PAGE
4 Mr. David Oppenheim 4
5 * * * * *

6 EXHIBITS

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1 KIFAH MUSTAPHA,
2 called as a witness herein, having been first duly
3 sworn, was examined upon oral interrogatories and
4 testified as follows:
5 EXAMINATION
6 BY MR. OPPENHEIM:
7 **Q Please state your full name for the record.**
8 A Kifah Mustapha.
9 **Q Do you go by any other names?**
10 A No.
11 **Q Have you ever been known by any other names?**
12 A That's my name.
13 **Q Have you ever been deposed before?**
14 A At a deposition, no.
15 **Q Have you ever testified in court before?**
16 A No.
17 **Q Well, today in the deposition, in that case, why**
18 **don't I explain a few ground rules. I'm going to ask a**
19 **series of questions and you're going to answer them and**
20 **the court reporter is going to take down everything that**
21 **both of us and everybody else in the room says. So if**
22 **you can try real hard and I'm going to try real hard not**
23 **to talk over you, if you try not to talk over me, we'll**
24 **get a nice clean transcript out of this at the end of**

1 **the day.**
2 **If you don't understand what I'm asking at any**
3 **time, please stop me, ask me to clarify. I'm sure**
4 **that's going to happen. And if do you answer something**
5 **and don't stop me and ask me to clarify, I'm going to**
6 **assume you understood it; is that fair?**
7 A Okay.
8 **Q Now, are you represented by counsel here today?**
9 A Personally, no. I mean, I have the lawyers for
10 the HLF and IHP, but personally, no.
11 MS. HOLLANDER: Can I put on the record that my name
12 is Nancy Hollander. I represent the Holy Land
13 Foundation, and to the extent that Mr. Mustapha was an
14 employee of Holy Land, to the extent the questions are
15 about Holy Land, then we'll defend.
16 MR. FENNERTY: My name is James Fennerty, and the
17 same statement applies to myself as the attorney for the
18 Islamic Association of Palestine and the American Muslim
19 Society.
20 BY MR. OPPENHEIM:
21 **Q I'm going to hand you a document right now which**
22 **we're going to mark Exhibit 1.**
23 (Document marked as requested.)
24 BY MR. OPPENHEIM:

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1 **Q Have you ever seen this document before?**
 2 A I don't recall, no. I mean, was it sent to --
 3 **Q Well, just if you've seen it.**
 4 A No.
 5 **Q You are here today, though, because the lawyers**
 6 **asked you to come; is that fair?**
 7 A Yes.
 8 **Q I don't want to get into what the lawyers**
 9 **actually told you about anything.**
 10 A Yes.
 11 **Q Okay. Now, are you a current employee of the**
 12 **Holy Land Foundation?**
 13 A No.
 14 **Q Were you ever an employee of the Holy Land**
 15 **Foundation?**
 16 A Yes.
 17 **Q When did you stop being an employee of HLF?**
 18 A The time it was put on halt by the government.
 19 Somewhere in 2001.
 20 **Q And when did you began working for Holy Land?**
 21 A As I remember, it might be either '95 or '96.
 22 **Q And what was your title? I guess if it changed,**
 23 **start from when you began working all the way up until**
 24 **2001.**

1 A I was basically the registered agent for HLF in
 2 Illinois.
 3 **Q And what duties did that position entail?**
 4 A Conduct soliciting money for the various
 5 programs that HLF had.
 6 **Q And this was done solely within the state of**
 7 **Illinois?**
 8 A Yes, but sometimes we would go outside. They
 9 will call us to go to another state.
 10 **Q Did you work at an office regularly or did you**
 11 **work out of your home? How was that set up?**
 12 A We had a rented office. First it was in Palos
 13 Hills, Illinois, and then it was in Bridgeview,
 14 Illinois.
 15 **Q Do you remember the addresses?**
 16 A The first one maybe 9740 something on Roberts
 17 Road and the second 9250 South Harlem.
 18 **Q Were there -- How many employees, on average,**
 19 **worked at the office when you were there?**
 20 A Just myself.
 21 **Q And that's true for the entire period from '95**
 22 **to 2001?**
 23 A Yes.
 24 **Q Now, are you currently affiliated in any way**

1 **with the Islamic Association for Palestine or the**
 2 **American Muslim Society?**
 3 A We do like volunteer work sometimes for them.
 4 **Q Have you ever been a member of the Islamic**
 5 **Association for Palestine board of directors?**
 6 A You know, there's all types of boards. We were
 7 a group of volunteers and we were a committee. I'm not
 8 sure if they included that in any of the board, but I
 9 did not register to be a board member as far as I
 10 remember.
 11 **Q Now, when you say we, who does that entail?**
 12 A Myself. You know, like I am a volunteer, so
 13 they might include the name as a volunteer and -- but I
 14 don't recall having myself registered as a board member
 15 and I didn't apply for that.
 16 **Q You said that you volunteered for IAP. What**
 17 **sort of things have you done?**
 18 A All sorts of -- like, for example, distribute
 19 flyers. Sometimes they held events. If it was
 20 festivals or conventions, we would help prepare, you
 21 know, for that.
 22 **Q Have you ever helped plan any of the conventions**
 23 **or festivals?**
 24 A Festivals, no. But I was part of some of the
 1 committees at conventions, yes.
 2 **Q And do you remember when you were part of the**
 3 **convention committee for IAP?**
 4 A I recall maybe two or three conventions. Maybe
 5 '99, 2000, 2001.
 6 **Q When was the first time you did volunteer work**
 7 **for IAP?**
 8 A Well, basically -- For the conventions
 9 themselves, you mean?
 10 **Q Actually, that's a good point. Why don't we**
 11 **say -- first answer the question regarding the**
 12 **conventions and then I'll get more general.**
 13 A Well, basically as a part of the committee, I
 14 recall maybe '99. Maybe at that time.
 15 **Q And when was the first time that you volunteered**
 16 **for IAP in any capacity?**
 17 A Well, maybe in '93, '94. Maybe before. I don't
 18 remember.
 19 **Q And has your work ever involved assisting in any**
 20 **way with any of their publications?**
 21 A No. Basically anything before '99 was
 22 completely limited. We do sing in a band and they
 23 invite us to sing. That was the primary type of
 24 volunteering for them.

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- 1 **Q What's your band called?**
- 2 A Al-Nujoum
- 3 **Q Can you spell that?**
- 4 A A-L N-U-J-O-U-M.
- 5 **Q What does that mean, just out of curiosity?**
- 6 A Stars.
- 7 **Q Have you ever been in any other bands?**
- 8 A Well, we have a local band here that's in
- 9 Chicago.
- 10 **Q What's that?**
- 11 A That's called Isra, I-S-R-A.
- 12 **Q What does that mean?**
- 13 A A trip, like walking in the night.
- 14 **Q Have you ever heard of a band called Al-Sakhra?**
- 15 A Yes.
- 16 **Q Were you ever in that band?**
- 17 A Well, basically we were Isra and then Al-Sakhra
- 18 was like nationwide, and we would go representing Isra
- 19 joined with Al-Sakhra, yes.
- 20 **Q So Al-Sakhra was -- and I apologize for my**
- 21 **butchering of the pronunciation -- was essentially a**
- 22 **name under which various local bands played; is that**
- 23 **what you're saying?**
- 24 A When I first started the band thing, it was

- 1 under Isra. That's the name for local guys. We are
- 2 here in Chicago. But there was Al-Sakhra established
- 3 already somewhere. It wasn't an umbrella for others,
- 4 no. It was a band by itself, and we would go perform
- 5 together.
- 6 **Q And during what time period are you talking**
- 7 **about when you would perform Isra and Al-Sakhra?**
- 8 A Maybe '91, '92 at the earliest.
- 9 **Q Until when?**
- 10 A Until -- Now it's all Al-Nujoum. We, you know,
- 11 formatted together Al-Nujoum.
- 12 **Q So is Al-Nujoum a combination of the bands that**
- 13 **were Isra and Al-Sakhra?**
- 14 A No. It was an idea we came up with, a few guys.
- 15 And then whoever wanted to join in, you know, new guys,
- 16 old guys, that's what happened.
- 17 **Q When was that band formed?**
- 18 A '95 or '96, something like that.
- 19 **Q You mentioned that you have been invited by IAP**
- 20 **to perform at some of their annual conferences. Do you**
- 21 **know which ones you had performed at?**
- 22 A Since '91, basically -- conference, I don't
- 23 recall. But for festivals, almost every year.
- 24 **Q Okay. What, just out of curiosity, is the**

- 1 **difference between a conference and a festival?**
- 2 A A conference is a three-day program that people
- 3 come and sleep over and family-type of stuff. A
- 4 festival is a one-day, two hours, you know, party, if
- 5 you want to call it.
- 6 **Q Do you speak any languages other than English?**
- 7 A Arabic.
- 8 **Q Are you fluent both reading and writing in**
- 9 **Arabic?**
- 10 A Yes.
- 11 **Q Do you speak any other languages?**
- 12 A Little bit French. That's all.
- 13 **Q Now, we've talked some about your involvement**
- 14 **with Holy Land Foundation, which from now on for ease**
- 15 **I'm going to call HLF, and the Islamic Association for**
- 16 **Palestine, which I'm going to refer to as IAP, and also**
- 17 **your bands, Al-Nujoum and Isra. Have you been involved**
- 18 **in any other organizations over, say, the past 10, 15**
- 19 **years?**
- 20 A Could you be more specific?
- 21 **Q I mean, have you volunteered with any other**
- 22 **organizations?**
- 23 A I believe, yes. Maybe too many.
- 24 **Q Let me ask you this then. Are there any that --**

- 1 **other organizations that you've volunteered for that you**
- 2 **put the same amount of time and effort in as you have**
- 3 **with HLF or IAP?**
- 4 A No.
- 5 **Q Have you ever been public spokesman for any**
- 6 **other organizations?**
- 7 A No. Well, now I am employed by an organization
- 8 which I am a public speaker for that organization.
- 9 **Q Which organization is that?**
- 10 A The Mosque Foundation.
- 11 **Q And when did you first start working for the**
- 12 **Mosque Foundation?**
- 13 A March of 2002.
- 14 **Q And have you been an employee spokesperson for**
- 15 **any other organization prior to that?**
- 16 A Well, I'm not employed as a public spokesman.
- 17 That's part of what I do. But I was never employed as a
- 18 public spokesman for anybody.
- 19 **Q Where did you work before working for the Mosque**
- 20 **Foundation?**
- 21 A HLF.
- 22 **Q And during the time that you were employed by**
- 23 **either HLF or the Mosque Foundation, have you held any**
- 24 **other jobs?**

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1 A At the time of HLF, no. Now I'm employed by the
 2 Mosque Foundation.
 3 **Q But --**
 4 A I'm not employed by somebody else. Just the
 5 Mosque Foundation.
 6 **Q Thank you. Are you familiar with -- Strike**
 7 **that.**
 8 **Are you aware of any connections between the**
 9 **Mosque Foundation and HLF?**
 10 A The only connection is as an institution for the
 11 Mosque Foundation, people will apply to come and solicit
 12 funds for certain projects they believe, and the Mosque
 13 Foundation might accept or reject their application.
 14 And that's how it was at the time when I was employed by
 15 HLF. We would request and then they will say yes or no.
 16 **Q So did HLF work with the Mosque Foundation in**
 17 **any projects while you were employed by HLF?**
 18 A I wouldn't say they worked on projects. They
 19 would only appeal. They would have a session to talk to
 20 people, and then the Mosque Foundation will say yes.
 21 They will allow them to come and talk to the
 22 congregation about their projects.
 23 **Q So HLF would come and solicit funds at the**
 24 **Mosque Foundation?**

1 A Yes.
 2 **Q Was that something that happened regularly?**
 3 A Yes. On a yearly basis, maybe once.
 4 **Q And do you know of any relationship between the**
 5 **Mosque Foundation and IAP?**
 6 A Same. Like HLF would come and request, IAP
 7 would come and do the same thing.
 8 **Q As part of your work for IAP, were you ever the**
 9 **one that went to the Mosque Foundation and asked for**
 10 **permission as you put it?**
 11 A No.
 12 **Q How about for HLF?**
 13 A Yes, I was the one.
 14 **Q Were you always the one?**
 15 A Well, basically, yes. But sometimes I may be
 16 somewhere else. You know, the headquarters in Dallas
 17 might contact.
 18 **Q When you made these contacts, was it always with**
 19 **the same person at the Mosque Foundation?**
 20 A No. Because every two years they have new
 21 presidents and new board members. You have to go
 22 through the president most of the time. So he changes
 23 every couple years or something like that.
 24 **Q So when you were to make these overtures, you**

1 **would go to the sitting president of the Mosque**
 2 **Foundation?**
 3 A Or the leader of the congregation we call imam.
 4 **Q Has that been the same person?**
 5 A Yes. The imam has been the same, but the
 6 president changes. And usually we need to get the okay
 7 from the president.
 8 **Q Is the imam Sheikh Jamal Said?**
 9 A Yes.
 10 **Q He's been the imam since you began working for**
 11 **HLF?**
 12 A Yes.
 13 **Q Have you heard of an organization known as the**
 14 **Quranic Literacy Institute?**
 15 A I just heard the news.
 16 **Q Have you ever been involved with them in any**
 17 **way? Employed, volunteer?**
 18 A No.
 19 **Q Do you know if they have any sort of**
 20 **relationship with the Mosque Foundation?**
 21 A I have no idea.
 22 **Q You never, when you were working with HLF, saw**
 23 **that they were involved in working with the Mosque**
 24 **Foundation as HLF and IAP were?**

1 A Not to my knowledge.
 2 **Q How about now? Now that you are an employee of**
 3 **the Mosque Foundation, have you had any dealings --**
 4 A Not to my knowledge.
 5 **Q -- with QLI? I'm sorry. If you could just let**
 6 **me finish. I know I speak slowly sometimes.**
 7 A Sorry.
 8 **Q Are you familiar with an individual by the name**
 9 **of Mohammed Salah?**
 10 A Yes, I know him.
 11 **Q And how do you know him?**
 12 A Well, he attends the mosque.
 13 **Q That is the Mosque Foundation?**
 14 A Yes.
 15 **Q When was the first time you met him?**
 16 A I don't recall. But since I started working for
 17 the Mosque Foundation, I see him daily.
 18 **Q Do you recall if you knew him before you began**
 19 **working for the Mosque Foundation in 2000?**
 20 A I only knew the name when the case started, you
 21 know, but I don't recall that I know him personally.
 22 **Q And has he been involved in any of the functions**
 23 **of the Mosque Foundation other than as a worshipper?**
 24 A Not that I know of.

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- 1 **Q Are you familiar with an organization called**
- 2 **UMAA, U-M-A-A?**
- 3 A Yes.
- 4 **Q What did -- Have you been involved with them in**
- 5 **any capacity?**
- 6 A No.
- 7 **Q You've just heard of them?**
- 8 A Well, they are visible in the community, you
- 9 know, like any other organization. They conduct
- 10 activities, so yes, you see them.
- 11 **Q You've never been involved in any of those**
- 12 **activities, though, have you?**
- 13 A Well, we attend. Like any other fund-raising in
- 14 the community, you go. But I understood from your
- 15 question like to be part of their -- no, I haven't been
- 16 part of their board or team.
- 17 **Q Have you ever personally contributed money to**
- 18 **UMAA?**
- 19 A Maybe.
- 20 **Q So have you ever personally contributed money to**
- 21 **HLF?**
- 22 A Yes.
- 23 **Q How about IAP?**
- 24 A Maybe, yes.

- 1 **Q QLI?**
- 2 A No.
- 3 **Q Are you familiar with an organization called**
- 4 **CAIR, C-A-I-R?**
- 5 A Yes.
- 6 **Q Have you volunteered or worked for them?**
- 7 A You know, this is a national group in which they
- 8 would come to the mosque like any other organization. I
- 9 don't recall that I have been part also as an assigned
- 10 team or a group as a volunteer, but I contributed for
- 11 them. Basically I might have attended one of their
- 12 fund-raisers or something like that.
- 13 **Q So they have come to the Mosque Foundation to**
- 14 **solicit funds in the same way as HLF and IAP?**
- 15 A Yes.
- 16 **Q Have you dealt with their representatives to set**
- 17 **that up in your capacity as an employee of the Mosque**
- 18 **Foundation?**
- 19 A No.
- 20 **Q Now, you mentioned that part of your job**
- 21 **currently is as a spokesman?**
- 22 A No. Let me rephrase that correctly. I just
- 23 give the ceremony, you know, the prayer. It's part --
- 24 You pray part; you give a lecture.

- 1 **Q In those lectures, have you ever given a lecture**
- 2 **on the subject of Hamas?**
- 3 A No, not that I recall.
- 4 **Q Have you ever given a lecture on the subject of**
- 5 **Mohammed Salah and his imprisonment in Israel?**
- 6 A Not that I recall.
- 7 **Q How about on the government's action against**
- 8 **HLF?**
- 9 A Well, we might have mentioned the type of
- 10 support that the community should do to stand behind,
- 11 you know, the cases of the community in that matter,
- 12 yes.
- 13 **Q What types of support would that be?**
- 14 A You know, like there was some probably petitions
- 15 to be signed. Something like that.
- 16 **Q But in terms of your talk on the HLF case, did**
- 17 **you comment at all on the merits of it?**
- 18 A Would you explain that?
- 19 **Q Well, was your activity limited to we need to**
- 20 **support these guys, so please sign a petition? Or was**
- 21 **your talk a detailed description of why they were being**
- 22 **mistreated?**
- 23 A No. Basically, it was limited to the type of
- 24 the support, you know. They basically had like papers

- 1 to be signed, you know, for the government or something
- 2 to be signed and asked for support. That's basically --
- 3 **Q So I guess my question is -- I just thought of**
- 4 **how to simplify it. Your role has been limited to**
- 5 **explaining what to do and how rather than why; is that**
- 6 **correct?**
- 7 A Yes. Anything that falls under the legal way
- 8 to, you know, support, we did.
- 9 **Q Have you given any talks in your position on the**
- 10 **government's action against InfoCom in Texas? Let me**
- 11 **back up.**
- 12 **Have you heard of a company called InfoCom?**
- 13 A I've heard of the company.
- 14 **Q Have you given a talk on the government action**
- 15 **against InfoCom?**
- 16 A Not that I recall, no.
- 17 **Q How about have you given a talk on the**
- 18 **government's prosecution of Sami Al-Arian.**
- 19 A Not that I recall.
- 20 **Q Have you given a talk on this case?**
- 21 A No, not that I recall.
- 22 **Q I asked before if you worked on any of IAP's**
- 23 **publications. Do you subscribe to any of the IAP**
- 24 **publications?**

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- 1 A Not that I recall.
- 2 **Q Well, I mean, do you or don't you?**
- 3 A I don't -- No, I do not. I don't remember
- 4 subscribing to any, no.
- 5 **Q For example, I know that currently they have an**
- 6 **e-mail list. Are you on the e-mail list serve?**
- 7 A I might have been for a while when we were in
- 8 the committee for the conventions, but now I don't.
- 9 **Q You don't receive IAP news updates frequently?**
- 10 A No.
- 11 **Q Mr. Mustapha, what is your educational**
- 12 **experience, I guess, starting with anything past high**
- 13 **school and moving forward? If you could give me --**
- 14 A Well, I finished high school in Lebanon. I came
- 15 here to the States and I just took like a couple classes
- 16 in English, and that's basically it.
- 17 **Q And when did you come to the States from**
- 18 **Lebanon?**
- 19 A '88.
- 20 **Q And you've been here ever since?**
- 21 A Yes.
- 22 **Q Have you traveled overseas since moving to this**
- 23 **country?**
- 24 A Yes.

- 1 **Q Do you do that frequently?**
- 2 A I visit home, yes.
- 3 **Q Maybe on an annual basis or more frequently than**
- 4 **that?**
- 5 A Whenever I can afford it.
- 6 **Q That certainly makes sense. But has that been**
- 7 **more or less often than once a year?**
- 8 A Now I try to do it every year.
- 9 **Q Okay. Have you visited any other places in the**
- 10 **Middle East other than Lebanon?**
- 11 A Jordan, my wife is from there. Saudi Arabia,
- 12 that's where we go for the pilgrimage. And Britain, I
- 13 have a brother other there. That's the personal
- 14 visitations.
- 15 With HLF, we have been to countries.
- 16 **Q Do you remember which ones?**
- 17 A Basically like Venezuela, the Caribbean. Too
- 18 many islands. I don't recall the names. They're all
- 19 small.
- 20 **Q Okay.**
- 21 A But it basically was like twice. And one time
- 22 to Albania.
- 23 **Q Ever go to Chechnya?**
- 24 A No.

- 1 **Q How about anywhere in the Balkans like Bosnia or**
- 2 **Serbia.**
- 3 A Albania.
- 4 **Q That is in the Balkans. I need my geography**
- 5 **lesson. How about in the Middle East in your capacity**
- 6 **with HLF?**
- 7 A Never. I never went to the Middle East for HLF.
- 8 **Q And your trips for HLF, for what purpose were**
- 9 **they taken?**
- 10 A Same like we do in the States. They send me to
- 11 a mosque. We go give the lecture, urge people to donate
- 12 to the projects of HLF, and then come back.
- 13 **Q So these are essentially for fund raising?**
- 14 A Yes.
- 15 **Q Have you ever gone on a trip in order to oversee**
- 16 **distribution of funds that have been raised by HLF?**
- 17 A No.
- 18 **Q How frequent were these fund-raising trips that**
- 19 **you took when you were working for HLF?**
- 20 A Well, maybe just three trips.
- 21 **Q Over the course of the five or six years that**
- 22 **you worked there, only three? One was to Albania --**
- 23 A And a couple to the Caribbean.
- 24 **Q And do you remember when those three trips were?**

- 1 A I can't specify a year exactly. Somewhere
- 2 between '96 and 2000.
- 3 **Q And you mentioned going on three of these trips.**
- 4 **Were they spread out over that period or do you remember**
- 5 **if they all came at once? How did that work?**
- 6 A Headquarters would call me. We have an arranged
- 7 trip for you to one, two, three -- like it would be one
- 8 trip, but you might visit one island, two islands, three
- 9 islands, and then I'll come back. Maybe a year after or
- 10 couple years after, I went to another trip.
- 11 **Q And you said the total was three of these trips**
- 12 **in your -- in the time that you worked at HLF?**
- 13 A There might be one more, but I would think there
- 14 were three total.
- 15 **Q Were you involved at all in overseeing the funds**
- 16 **that came in?**
- 17 A No. Not for the HLF headquarters, no.
- 18 **Q So --**
- 19 **MS. HOLLANDER: Can you clarify by what you mean by**
- 20 **overseeing the funds?**
- 21 **MR. OPPENHEIM: Sure.**
- 22 **BY MR. OPPENHEIM:**
- 23 **Q I guess that's kind of where I'm going now. I'm**
- 24 **just trying to understand what your role in HLF**

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1 operations was. You mentioned that you'd go out and
 2 speak at places like the Mosque Foundation and the
 3 equivalent and ask for donations?
 4 A Yes.
 5 Q Where did you ask for these donations to be
 6 sent?
 7 A Mosques, primarily.
 8 MS. HOLLANDER: I don't think he understood your
 9 question.
 10 BY MR. OPPENHEIM:
 11 Q When you're speaking and asking the people in
 12 the audience to donate to the Holy Land Foundation, what
 13 specifically are you asking them to do?
 14 A Well, basically we had a list of projects that
 15 the HLF had, you know, told us about, and those projects
 16 would include like, for example, a food package in the
 17 holy month of Ramadan. Buy a sheep to be distributed as
 18 meat to the needy. A school backpack package. Stuff
 19 like that.
 20 Q So you'd tell about all of these projects that
 21 you're trying to raise money for and then ask the
 22 congregation to give money toward those projects?
 23 A Yes.
 24 Q Would you then just simply ask them to write a

1 check to the Holy Land Foundation and mail it to
 2 Richardson, Texas?
 3 A This is how the process goes. We will receive
 4 flyers or, like, forms from headquarters. It will
 5 include the name, address for the guy who want to
 6 donate. And then on the back it will say like school
 7 package, Ramadan, something like that. So I'll make the
 8 speech, and the papers will be ready for the people
 9 outside on the way out.
 10 Most of the times, people would fill and either
 11 mail it themselves, because it had a self-stamped
 12 envelope thing. Or they had gathered -- The other, that
 13 they'll make the checks and it will be given to me and I
 14 will mail it to HLF. That's if it was outside of
 15 Illinois. Everything that -- that will be mailed.
 16 In my office in Illinois we had a bank that we
 17 deposited the money in and then, you know, I had
 18 authority only on depositing for that account. So the
 19 money that will come, it will be deposited. I had
 20 another account only for like expenses. \$500, \$600
 21 budgeted for bills. That's how it used to happen.
 22 Q So you mentioned your authority is only for
 23 deposits. Do you know who had authority for withdrawals
 24 in that account?

1 A I would assume Mr. Abu Baker.
 2 Q Was he able to --
 3 MS. HOLLANDER: Don't speculate. Answer the
 4 question if you know the answer.
 5 THE WITNESS: I don't know.
 6 BY MR. OPPENHEIM:
 7 Q Would you -- Do you know if he was able to
 8 withdraw those funds from Texas or did he have to fly
 9 into Illinois periodically to collect the money?
 10 A I wasn't involved in the way they handled the
 11 account with the bank, so I really don't know much.
 12 Q And were you ever involved -- And I think I may
 13 have asked this, and if I did I apologize. Were you
 14 ever involved with distributing money to any sort of aid
 15 recipients for any of these projects?
 16 A No.
 17 Q Were you aware of any of the -- any other office
 18 that HLF maintained while you worked in the Illinois
 19 office?
 20 A Do I know if HLF had other offices?
 21 Q Yes.
 22 A Yes.
 23 Q Do you know where they were?
 24 A I know one in New Jersey.

1 Q Where in New Jersey?
 2 A I'm not familiar with what city, but somewhere
 3 in New Jersey.
 4 Q And presumably you know of the headquarters in
 5 Texas?
 6 A Yes.
 7 Q Do you know of any others?
 8 A Well, HLF had offices open, but I don't know
 9 exactly addresses of those offices or something, you
 10 know.
 11 Q Do you know which cities they might have been
 12 in?
 13 A I recall once meeting with, you know,
 14 representatives from Detroit and New York maybe.
 15 Q Do you know if HLF had any offices outside the
 16 United States?
 17 A I don't know personally.
 18 Q You never heard anyone talk about any non-U.S.
 19 offices?
 20 A I mean, I don't recall, no. But I don't know,
 21 like, they have physical office somewhere outside. I
 22 don't know.
 23 Q Have you ever heard the name Muhammed Anati,
 24 A-N-A-T-I?