

## Statement of Facts

The following Statement of Facts is being submitted in support of a SEARCH WARRANT for “The Islamic Center of \_\_\_\_\_” located at ADDRESS, CITY, STATE.

1. The “International Muslim Brotherhood” was created in 1928 in Egypt with the expressly stated purpose of establishing the global Islamic State (Caliphate) and Implementing Islamic Law.
2. The By-Laws of the Muslim Brotherhood state: “The Muslim Brotherhood is an international Muslim body which seeks to establish Allah’s law in the land.” (Article 2) It should be noted that “Allah’s law” refers to Islamic Law or “Shariah.”
3. The “Creed” of the Muslim Brotherhood is: “Allah is our goal; the Messenger is our guide; the Koran is our law; Jihad is our way; and martyrdom in the way of Allah our inspiration.”
4. The By-Laws of the Muslim Brotherhood state: “The Islamic nation must be fully prepared to fight the tyrants and the enemies of Allah as a prelude to establishing an Islamic State.” (Article 3, para E)
5. “The Islamic Resistance Movement (Hamas) is one of the wings of the Muslim Brotherhood in Palestine.” (Hamas Covenant, 1988). Hamas is the Muslim Brotherhood in Palestine.
6. Hamas is designated as a Foreign Terrorist Organization (FTO) by the United States Department of State.
7. A 2004 FBI raid in Annandale, Virginia uncovered the archives of the Muslim Brotherhood in North America, including strategic/operational Brotherhood records, financial documents, photographs, video/audio recordings, and other similar materials.
8. Some of the documents/materials recovered in the 2004 FBI raid in Annandale, Virginia were entered into evidence at the US v Holy Land Foundation (HLF) trial in the Northern District of Texas. In November 2008, HLF and its leadership were convicted of numerous terrorism charges including providing financial support to a designated Foreign Terrorist Organization (FTO), namely “The Islamic Resistance Movement” or “Hamas.”
9. Muslim Brotherhood documents, testimony during the trial, and other evidence revealed an ongoing “Islamic Movement” in the United States led by the Muslim Brotherhood, with the explicit objective of overthrowing the U.S. Constitutional Republic and replacing it with an Islamic State under which Shariah (Islamic Law) is the law of the land.
10. An audio cassette tape recovered at the 2004 FBI raid contained a speech given in Arabic by a member of the Muslim Brotherhood’s Executive council in the United States, Zaid Noman, speaking to a group of Muslim Brothers in Missouri in 1981. In this discussion, it is revealed that: (1) the Muslim Brotherhood conducts military operations or “military work” under the listing of “Special work;” (2) the Muslim Brotherhood has an internal security apparatus to protect it from outside dangers including U.S. government entities,

- and specifically mentions the FBI and CIA; and (3) the Muslim Brotherhood has active weapons training camps inside the United States.
11. The Muslim Brotherhood's five (5) phase plan to overthrow the government, entitled "The World Underground Movement Plan," states for Phase 4: "Training on the use of weapons domestically and overseas in anticipation of zero hour. It has noticeable activities in this regard." It should be noted this is an undated document discovered by the FBI in 2004.
  12. The current leader (Supreme Guide) of the International Muslim Brotherhood, Mohammed Badie, publicly stated on September 30, 2010: Today the Muslims...crucially need to understand that the improvement and change that the Nation [Ummah] seeks can only be attained through Jihad and sacrifice and by raising a Jihadi generation that pursues death just as the enemies pursue life."
  13. The Muslim Brotherhood's strategic document, "An Explanatory Memorandum" described the Muslim Brotherhood's strategy in the United States as follows: "The process of settlement is a "Civilization-Jihadist Process" with all the word means. The Ikhwan must understand that their work in America is a kind of grand Jihad in eliminating and destroying the Western civilization from within and "sabotaging" its miserable house by their hands and the hands of the believers so that it is eliminated and God's religion is made victorious over all other religions. Without this level of understanding, we are not up to this challenge and have not prepared ourselves for Jihad yet."
  14. The last page of "An Explanatory Memorandum" identifies 29 organizations as being a part of the Muslim Brotherhood's Islamic Movement in North America, including the North American Islamic Trust (NAIT), the Islamic Society of North America (ISNA), the International Institute for Islamic Thought (IIIT), the Fiqh Council of North America, and the Muslim Students Association (MSA).
  15. ISNA and NAIT are listed as "Unindicted Co-conspirators" in the US v HLF case (Attachment A). ISNA and NAIT petitioned the court to have their names removed from the Unindicted Co-conspirator list (Attachment A). On July 10, 2008, the government filed a response which included the following:  
"Although the indictment in this case charges the seven named individual defendants and the Holy Land Foundation for Relief and Development, it will be obvious that the defendants were not acting alone. . . . the defendants were operating in concert with a host of individuals and organizations dedicated to sustaining and furthering the Hamas movement. Several of the individuals who hold leading roles in the operation of Hamas are referenced by name in the indictment. A list of unindicted coconspirators is attached to this trial brief. (Attachment A). The object of the conspiracy was to support Hamas. The support will be shown to have taken several forms, including raising money, propaganda, proselytizing, recruiting, as well as many other types of actions intended to

continue to promote and move forward Hamas's agenda of the destruction of the State of Israel and establishment of an Islamic state in its place." (p 5)

"During the trial, the Court entered into evidence a wide array of testimonial and documentary evidence expressly linking ISNA and NAIT to the HLF and its principals; the Islamic Association for Palestine and its principals; the Muslim Brotherhood in the United States and its Palestine Committee, headed by HAMAS official Mousa Abu Marzook; and the greater HAMAS-affiliated conspiracy described in the Government's case-in-chief." (p 7)

"The evidence introduced at trial, for example, established that ISNA and NAIT were among those organizations created by the U.S.-Muslim Brotherhood." (p 12) "ISNA and NAIT, in fact, shared more with HLF than just a parent organization. They were intimately connected with the HLF and its assigned task of providing financial support to HAMAS." (p 13)

16. On July 1, 2009, Federal District Judge Jorge Solis ruled on this matter and stated: "The Government has produced ample evidence to establish the associations of CAIR, ISNA, and NAIT, with HLF, the Islamic Association for Palestine ("IAP"), and with Hamas." The Judge ruled to keep the names of these organizations on Attachment A – the Unindicted Co-Conspirator list. A 3-judge appellate panel unanimously concurred.
17. A current edition of the Um Dat al Salik, "Reliance of the Traveller" – Islamic Law published in Beltsville, MD – contains a letter of certification signed by the President of the Fiqh Council of North America and the International Institute for Islamic Thought (IIIT) stating this book of Islamic Law is valid and approved by these two Muslim Brotherhood entities. This book defines "Jihad" as: "Warfare against non-Muslims" which is obligatory upon all Muslims until the world is subordinated to Islamic law.
18. The website for the North American Islamic Trust (NAIT) – [www.nait.net](http://www.nait.net) – states: "The North American Islamic Trust (NAIT) is a waqf, the historical Islamic equivalent of an American trust or endowment, serving Muslims in the United States and their institutions. NAIT facilitates the realization of American Muslims' desire for a virtuous and happy life in a Shari'ah-compliant way. NAIT is a not-for-profit entity that qualifies as a tax-exempt organization under Section 501(c) (3) of the Internal Revenue Code. NAIT was established in 1973 in Indiana by the Muslim Students Association of U.S. and Canada (MSA), the predecessor of the Islamic Society of North America (ISNA). NAIT supports and provides services to ISNA, MSA, their affiliates, and other Islamic centers and institutions. The President of ISNA is an ex-officio member of the Board of Trustees of NAIT."
19. The Islamic Center of \_\_\_\_\_ is owned by the North American Islamic Trust (NAIT).
20. The By-Laws of the Islamic Center of \_\_\_\_\_ specifically state that upon dissolution of the Center: "All assets shall be returned to the Islamic Society of North America" or "All assets shall become the property of the North American Islamic Trust."
21. Page 10 of the Muslim Brotherhood's "An Explanatory Memorandum" states: "**17- Understanding the role and the nature of work of "The Islamic Center" in every city**

- with what achieves the goal of the process of settlement:** The center we seek is the one which constitutes the "axis" of our Movement, the "perimeter" of the circle of our work, our "balance center", the "base" for our rise and our "Dar al-Arqam" to educate us, prepare us and supply our battalions in addition to being the "niche" of our prayers.”
22. The Muslim Brotherhood’s “Implementation Manual” (1991-92) which “implements” their strategy articulated in their “Explanatory Memorandum” states one of the goals of the Executive Office is: “Developing Islamic Centers and supporting them to become fronts for Brotherhood work.”
  23. According to the website for the Islamic Center of \_\_\_\_\_, Imam XXXX was educated/trained as an Islamic Legal Scholar at Al Azhar University in Egypt, the most pre-eminent school of Islamic Jurisprudence in the world and the oldest.
  24. The website for the Islamic Center openly states its affiliation with the following Muslim Brotherhood organizations: The Muslim American Society, the Muslim Students Associations, and the Council on American Islamic Relations (CAIR), a front organization for the designated terrorist organization Hamas.
  25. The Islamic Center of \_\_\_\_\_ accepts “Zakat” payments on its website and states it is “Zakat Eligible.” According to Book H “Zakat” in the Reliance of the Traveller (authoritative Islamic Law approved by the Muslim Brotherhood in North America), Zakat is mandatory giving which must be divided equally into 8 categories of recipients. Category 7 states 1/8 of the Zakat monies are to be given for the “Cause of Allah” meaning: “Those fighting for Allah”...Islamic military operations. Jihad...

Your affiant believes that Probable Cause exists that the Islamic Center of \_\_\_\_\_ is a part of the Muslim Brotherhood’s “Islamic Movement” inside the United States whose stated objective is the overthrow of the United States government and the establishment of an Islamic State. Your affiant further believes that documents and instrumentalities to further this movement, to possibly include evidence of an ongoing conspiracy to violently overthrow the government of the United States may be present inside this location.....