

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	Case No.
v.)	
)	03-1009M
Abdurahman Muhammad Alamoudi)	
a/k/a Abdulrahman Alamoudi)	
Abdul Rahman Al-Amoudi)	
Abdulrahman Mohamed Omar Alamoudi)	

DECLARATION IN SUPPORT OF DETENTION

Brett Gentrup states as follows:

I. PROFESSIONAL EXPERIENCE OF AFFIANT

1. I am a Special Agent of the U.S. Immigration and Customs Enforcement (ICE) currently assigned to the Office of the Special Agent in Charge, Washington, DC (SAC/DC) and have been employed as a Special Agent with ICE and the United States Customs Service for approximately two years. I have conducted and participated in a complex international money laundering investigation, that involved complex sequences of domestic and international transfers of money, between individuals and organizations, which involve “front companies” and “phantom organizations”. These layered transactions are designed to both disguise the true origin and end-destination of the funds and render it exceedingly difficult and confusing for any prospective investigation by law enforcement authorities.

2. Before joining ICE, I obtained a Bachelor of Accountancy and a Bachelor of Criminal Justice from New Mexico State University. I worked as an auditor with KPMG LLP for three years, where I participated in financial statement audits of Fortune 500 companies and analyzed complex financial transactions.

3. I believe that Alamoudi is engaged in financial transactions with the government of Libya, one of the seven state sponsors of terrorism, based on both his statements to Special Branch and the evidence corroborating a relationship with the government of Libya which is outlined in this affidavit. However, we cannot be certain that the \$340,000 in currency seized from Alamoudi on August 16, 2003 were necessarily intended for the AMF. Indeed, because cash is an anonymous means of exchange, we have examined other possible uses of such funds.

4. Alamoudi was traveling to Damascus, Syria with the \$340,000. I know based on my experience, this investigation and news reports that Damascus has an office for HAMAS, where Mousa Abu Marzook, whose cause Alamoudi defended in the past, is located. I also know that Damascus is where Ramadan Shallah, the head of Palestinian Islamic Jihad is located. Both of these individuals have been designated as Specially Designated Global Terrorists, under United States anti-terrorism laws.

5. In addition, news reports indicate foreign fighters representing a number of Islamist groups, including Al-Qaeda, are entering Iraq from Syria. For instance, according to the September 27, 2003, Washington Post, Paul Bremer, the U.S. civil administrator in Iraq, stated that 123 of the 248 non-Iraqi fighters in custody in Iraq entered from Syria. Of the total 248 detainees, 19 are suspected Al-Qaeda members.

6. HAMAS, Palestinian Islamic Jihad, and Al-Qaeda have all been designated as terrorist organizations under United States anti-terrorism laws.

7. I also know, based on facts alleged in the Affidavit in support of the Criminal Complaint that the World Islamic Call Society (WICS) gives funds to the Palestinian cause, and to other Muslims around the world. I also know facts which show that WICS has been used to support terrorism in the past. In addition from my experience I have learned that couriers have been used by terrorists to deliver money to support terrorist acts or organizations. In addition, according to the 1991 Patterns of Global Terrorism (issued by the State Department), Libyans in the past used couriers to deliver money to terrorist organizations, with the transfer usually occurring in a third country.

8. We also know that Alamoudi's American Express Card has a bill for a Damascus, Syria Hotel, dated August 16, 2001, one day after his passport shows that he entered Libya. On this basis I believe that, even if the \$340,000 in currency was not intended for AMF in the United States, it was intended for delivery in Damascus to one or more of the terrorists or terrorist organizations active in Syria.

9. I have reviewed a transcript of a translation of a recorded statement made in Arabic by Alamoudi:

I think that the attacks that are being executed by Bin Laden and other Islamic groups are wrong especially hitting the civilian targets. For example, bombing the American embassy in Kenya in which many African Muslims have died and not a single American died. You killed 500 Africans and injured 5,000 and they you said we exploded an American embassy! [emphasis added] This is not good and this gives a bad image of the Muslims and Arabs, and even inside America itself. What is the result you achieve in destroying an embassy in an African country? [33:19] I prefer to hit a Zionist target in America or Europe or elsewhere but not like what

happened at the Embassy in Kenya. I prefer, honestly, like what happened in Argentina?

[Other man interrupts:] the Israeli Embassy?

[Back to Alamoudi:] No. The Jewish Community Center. It is a worthy operation, . . . even though we are very sorry for the death of the innocent. You have to choose the target so as not to put the Muslim in an uncomfortable situation. Our brothers who want to struggle have to choose this target. Regarding suicidal attacks inside Palestine, it's after attacks on the Palestinian people is bad and more than it gains, so our brothers should investigate if such target is worth it or is it a strategic target (like the Jewish Community Center in Argentina). So we should not go to the military solution unless we were forced to do that.

10. In my previous declaration I summarized newspaper coverage of what I have referred to as the Beirut Conference 2001. The State Department, in its Daily Press Briefing for February 13, 2001:

We have . . . seen reports that members of several terrorist organizations met in Beirut in late January and that they pledged to work together against Israel. We believe the participants included Hizballah and Palestinian rejectionist groups

11. I have seen a copy of a picture of the American delegation to the Beirut Conference 2001, published on the website for Minaret of Freedom. The website has a picture of Alamoudi, Yasser Bushnaq, Ahmed Youssef and Imad-ad-Dean Ahmad and bears a caption identifying this as the American delegation to this conference. In addition his passport has an entry visa for Lebanon dated January 28, 2001 and an exit of February 1, 2001. I have reviewed a translation of the Final Declaration of the Jerusalem Conference (what I have referred to as the Beirut Conference), which indicates that the Beirut Conference was in progress on January 30, 2001.

12. I obtained information from a reliable source that in January 2003, Alamoudi possessed at [REDACTED], Falls Church, VA, 22 separate powers of attorney for family members of

22 individuals, who the family members claimed were apprehended in Afghanistan detained at Guantanamo Bay, authorizing a particular attorney apparently based in Saudi Arabia or Yemen to act on the behalf of those family members in all lawsuits filed before American or International courts for the release of the detainees.

13. I have analyzed the database of telephone calls from Alamoudi's residential telephone number and cross-referenced it to multiple numbers in the Kingdom of Saudi Arabia listed in his Palm Pilot under the name of his wife, Shifa Alamoudi and Hasan Alamoudi. From reviewing a translation of a document found on computers seized from the offices of AMF and Success Foundation in March 2002, I know that Alamoudi has a brother named Hassan Mohammad Omar Aboud al-Amoudi. Between December 18, 2002 and September 29, 2002 there were 44 calls to his wife in Saudi Arabia, including five calls on September 29, 2003, and 28 to Hasan Alamoudi.

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

Brett Gentrup
Special Agent
U.S. Immigration and Customs Enforcement

Executed in Alexandria, VA
September 30, 2003