

## <u>INDICTMENT</u>

The Grand Jury Charges:

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## **INTRODUCTION**

At all times material herein:

1. The Harakat al-Muqawamah al-Islamiyya is Arabic for "The Islamic Resistance Movement" and is known by the acronym HAMAS. HAMAS, which is sometimes referred to by its followers as "The Movement," is a terrorist organization based in the West Bank and Gaza Strip (Gaza). HAMAS was founded in 1987 by Sheikh Ahmed Yassin as an outgrowth of the Palestinian branch of the Muslim Brotherhood. The Muslim Brotherhood is an international Islamic organization founded in Egypt in 1928

(hereinaster all references to the Occupied Land Fund will be as the HLF). In 1992, the HLF relocated to Richardson, Texas and became incorporated in Texas. The HLF represented itself to be a non-profit, tax exempt, charitable organization designed primarily to assist needy individuals in the West Bank and Gaza. In addition to the main office in Richardson, Texas, the HLF maintained offices in New Jersey, California, Illinois, Jerusalem, the West Bank and Gaza, and maintained a presence in other locations, such as Lebanon and Jordan.

- 12. The Islamic Association for Palestine (IAP) was the propaganda organization of the Palestinian Committee. It had offices in several cities throughout the United States, including Dallas and Chicago.
- 13. The defendant Shukri Abu Baker was the President, Secretary and Chief Executive Officer of the HLF. The defendant Shukri Abu Baker's brother is Jamal Abu Baker, a.k.a Jamal Issa, the former HAMAS leader in the Sudan and the current HAMAS leader in Yemen.
- 14. The defendant Mohammad El-Mezain was the original Chairman of the Board until in or about 1999, when he became Director of Endowments for the HLF.

  The defendant Mohammad El-Mezain is a cousin of HAMAS Deputy Political Chief and Specially Designated Terrorist Mousa Abu Marzook.
- 15. The defendant **Ghassan Elashi** was the original Treasurer, and became the Chairman of the Board of the **HLF** in 1999. He was also an incorporator of the IAP. The