

3/1995)

~~SECRET~~

DECLASSIFIED BY 60324UCBAW/SB/CHW
09-26-2011

FEDERAL BUREAU OF INVESTIGATION

b6
b7c

Precedence: PRIORITY

To: Albany

Atlanta

Baltimore

Birmingham

Boston

Charlotte

Chicago

Cincinnati

Cleveland

Columbia

Dallas

Denver

Detroit

FBIHQ

Houston

Indianapolis

Jackson

Jacksonville

Kansas City

Little Rock

Los Angeles

Memphis

Miami

Milwaukee

Date: 07/14/1997

4/8/02

CLASSIFIED BY: 60324UCBAW/SB/CHW

REASON: 1.5 (C)

DECLASSIFY ON: X

861257
953453

3,46,10
through 47

Attn: SA [REDACTED]

Attn: SA [REDACTED]

Attn: SA [REDACTED]

Attn: SA [REDACTED]

Attn: SA [REDACTED]
IOS [REDACTED]
SA [REDACTED]

Attn: SA [REDACTED]

Attn: SA [REDACTED]

Attn: SA [REDACTED]

Attn: SA [REDACTED]
SA [REDACTED]

Attn: SA [REDACTED]

Attn: SA [REDACTED]

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED EXCEPT
WHERE SHOWN OTHERWISE.

~~SECRET~~

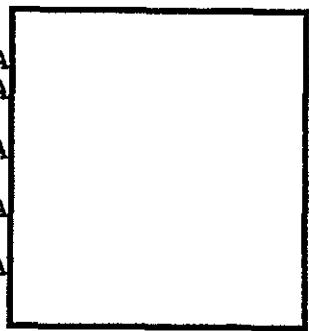
~~SECRET~~

New Haven

New Orleans

New York

Attn: SA
SA



b7C

Newark

Attn: SA

Norfolk

Attn: SA

Oklahoma City

Attn: SA

Omaha

Philadelphia

Phoenix

Attn: SA



b7C

Pittsburgh

Portland

San Antonio

San Diego

Attn: SA



b7C

San Francisco

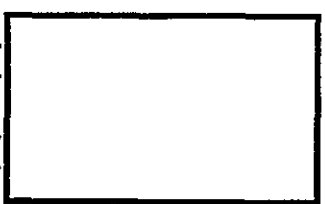
Seattle

Springfield

St. Louis

Tampa

Attn: SA
SA



b7C

WMFO

Attn: SA
SA

Legat London

Legat Ottawa

From: Chicago (S)

Contact: SA Robert G Wright Jr, (312) 786-



b7C

Approved By: [Redacted] n/or

b7C

Drafted By: Wright Robert G Jr:jaw

Case ID #: 265C-CG-101942 (Pending)

To: All Divisions From: Chicago
Re: 265C-CG-101942, 07/14/1997

~~SECRET~~

b1

Title: [REDACTED] (S)

OO: CHICAGO

Synopsis: Summary of investigation, other Federal agencies' participation, goals and identity of individuals/organizations to be interviewed.

Previous Title: NORTH AMERICAN ISLAMIC TRUST;

b7C

[REDACTED]
AOT - MONEY LAUNDERING; MAIL FRAUD; WIRE FRAUD;
VICTIM - [REDACTED]
OO: CHICAGO

b1

[REDACTED]
[REDACTED] (S)

Details: [REDACTED] (S)

[REDACTED] In January, 1995, a naturalized citizen and Chicago-area resident,

b1

b7C

[REDACTED]
[REDACTED] (S)

[REDACTED] employed by the Quranic Literacy Institute (QLI), Oak Lawn, Illinois. The QLI is located in a three-flat at the end of a cul-de-sac in a residential area and employs three to four individuals. On or about February 14, 1996, Federal Bureau of Investigation (FBI) and Immigration and Naturalization Service (INS) agents attempted to interview [REDACTED]. Employees refused to answer the door and asked agents, via intercom, to leave a business card and go away.

b7C

b7C

b7D

In March, 1996, the Chicago Division obtained a copy of [REDACTED]. In an effort to locate other persons who may have had knowledge of [REDACTED] activities, each person [REDACTED] was contacted. Twenty-three individuals agreed to be interviewed; thirty-four individuals refused to be interviewed and hired attorneys. Three aliens were placed in deportation proceedings, and another was served a notice of intent to revoke her Legal Permanent Resident (LPR) status.

b7C

b7D

Of the interviews conducted, the most significant was that of [REDACTED] Illinois. During an interview on [REDACTED]

~~SECRET~~

To: All Divisions From: Chicago
Re: 265C-CG-101942, 07/14/1997

~~SECRET~~

(U)
Title: [VULGAR BETRAYAL;] (S)
OO: CHICAGO

Synopsis: Summary of investigation, other Federal agencies' participation, goals and identity of individuals/organizations to be interviewed.

Previous Title: NORTH AMERICAN ISLAMIC TRUST;

[REDACTED]
AOT - MONEY LAUNDERING; MAIL FRAUD; WIRE FRAUD;
[REDACTED]
OO: CHICAGO

b6
b7C

(U) Administrative: The title is changed to reflect the code name Vulgar Betrayal assigned to facilitate the handing of captioned matter. (S)

(U) Details: [Operation Vulgar Betrayal was predicated by investigation of international terrorism activity in Chicago.] In January, 1995 [REDACTED] (S)

b6
b7C

[REDACTED] The QLI is located in a three-flat at the end of a cul-de-sac in a residential area and employs three to four individuals. On or about February 14, 1996, Federal Bureau of Investigation (FBI) and Immigration and Naturalization Service (INS) agents attempted to interview [REDACTED]

In March, 1996, the Chicago Division [REDACTED]

b6
b7C
b7E

Of the interviews conducted, [REDACTED]

b6
b7C
b7D

[REDACTED] During an interview on [REDACTED]

101942-202

~~SECRET~~

To: All Divisions ; From: Chicago
Re: 265C-CG-10I942, 07/14/1997

SECRET

[redacted] advised that [redacted] North American Islamic Trust (NAIT), assisted [redacted] in obtaining \$2,000,000.00 from NAIT for two land development projects in Chicago. Following this interview, a criminal investigation into NAIT was opened.

[redacted] further advised that in 1991, [redacted] introduced [redacted] to [redacted] OLI, for the purpose of obtaining funding for a third land development project. [redacted] contacted [redacted] who wire

[redacted] into [redacted] business account. [redacted] also solicited another \$1.5 million obtained from 10 medical doctors in Michigan who agreed to invest in the land development project. The [redacted] was utilized to purchase property in Woodridge, Illinois.

A lease/purchase option contract for the [redacted] property was executed between the QLI (leaser) and [redacted] Golden Marble Corporation (lessee) on February 1, 1992 and expired on July 1, 1993. Prior to [redacted] contacted [redacted] and insisted [redacted] be returned to the OLI. [redacted] reason for this request was [redacted]

[redacted] At the time of this request, [redacted] had more than six months remaining on the lease/purchase contract and was unable to repay [redacted] as demanded [redacted] In June, 1994, the QLI received over \$1 million for the Woodridge property when the group of 10 investors formed their own corporation, the Woodridge Fountain Corp., and exercised the option to purchase under the contract after the QLI had obtained the property title from [redacted]

Based upon an analysis of the sequence of events, it appears that [redacted] wire transferred [redacted] was HAMAS money [redacted]

[redacted] removed over [redacted] from [redacted] accounts and transferred the money into a new account at a different bank. On October 11, 1995 [redacted] with her attorney present, advised writer that she transferred the money because she feared the U.S. Government might attempt to take the money.

~~**SECRET**~~

To: All Divisi From: Chicago
Re: 265C-CG-101942, 07/14/1997

~~SECRET~~

[redacted] advised that [redacted]
[redacted]
[redacted] a criminal
investigation into NAIT was opened.

b6
b7C
b7D

A lease/purchase option contract for the Woodridge property was executed between the QLI (leaser) and [redacted] Golden Marble Corporation (lessee) on February 1, 1992, and expired on July 1, 1993. [redacted]

b6
b7C

[redacted] In June, 1994, the QLI received over \$1 million for the Woodridge property when the group of 10 investors formed their own corporation, the Woodridge Fountain Corp., and exercised the option to purchase under the contract after the QLI had obtained the property title from [redacted]

Based upon an analysis of the sequence of events, it appears that [redacted]

b6
b7C
b7D

b6
b7C

~~SECRET~~

To: All Divisions From: Chicago
Re: 265C-CG-101942, 07/14/1997

b7C On March 21, 1995, the Office of Foreign Assets Control (OFAC), Department of the Treasury, froze three [redacted] bank accounts (\$307,645.95) under President Clinton's executive order 12047 and 50 United States Code (U.S.C.) 1701 [redacted]

b3 In September, 1996, FBI case agents met with AUSA Mark Flessner regarding the money laundering investigation of NAIT and other unknown groups and individuals. The AUSA agreed a Grand Jury should be utilized to further this investigation. Initially 10 Grand Jury subpoenas were issued. [redacted]

[redacted] As of April 15, 1997, approximately 150 Federal Grand Jury subpoenas have been issued to [redacted] in 38 states.

b1 [redacted] In reviewing [redacted] the Chicago Division has identified approximately 45 organizations which appear to be involved in a massive money laundering conspiracy throughout the United States. Several of these organizations are wire transferring millions of dollars overseas. [redacted]

b7C [redacted]
b3 [redacted] In reviewing this [redacted] organization's financial records, the Chicago Division identified [redacted] as a significant contributor to the organization. (S)

Due to the volume of financial records associated with these organizations and the number of individuals associated with each organization, the Chicago Division will focus on the organizations in groups of five or six at a time. Although the groupings are subject to change, the following are the current group listings:

To: All Division From: Chicago
Re: 265C-CG-101942, 07/14/1997

On March 21, 1995, [redacted]

b6
b7C

[redacted]
[redacted] In September, 1996, FBI case agents met with AUSA [redacted]
[redacted] regarding the money laundering investigation of NAIT and
other unknown groups and individuals. The AUSA agreed a Grand
Jury should be utilized to further this investigation. Initially
10 Grand Jury subpoenas were issued. [redacted]

b3
b6
b7C

[redacted] As of April 15, 1997,
approximately 150 Federal Grand Jury subpoenas have been issued
to [redacted]

In September, 1996, FBI [redacted] made available to
Chicago FBI [redacted]

b6
b7C
b7D

(U)

~~(S)~~

(U)

b3
b6
b7C
b7D

~~X~~

b3
b7E

[redacted] Although the
groupings are subject to change, the following are the current
group listings:

~~X~~

To: All Divisions From: Chicago
Re: 265C-CG-101942, 07/14/1997

~~SECRET~~

GROUP 1: ~~NAIT~~
~~KSNA~~
~~Muslim Arab Youth Association (Indianapolis)~~
~~Islamic African Relief Agency~~
~~Somalia Relief Fund~~

GROUP 2: ~~Cultural Society~~
~~Muslim American Society~~
~~Mercy International~~
~~SAAR Foundation~~
~~Islamic Circle of North America~~
~~BMI~~

207

GROUP 3: ~~Mar-Jac Investment~~
~~Mar-Jac Processing~~
~~Global Relief Foundation~~
~~International Institute of Islamic Thought~~
~~Islamic Association for Palestine & American~~
~~Council for Public Affairs~~

GROUP 4: ~~Holy Land Foundation~~
~~Occupational Land Fund~~
~~Human Concern International~~
~~Crescent Investment~~
~~Abkar Investment, Inc.~~

GROUP 5: ~~Mecca Investment International~~
~~Islamic Relief Association~~
~~Habib International Corp.~~
~~International Relief Association~~

GROUP 6: ~~Piedmont Feed Mill, Inc.~~
~~Piedmont Poultry Processing, Inc.~~
~~Bosnia Relief Fund~~
~~Taty Enterprises, Inc.~~
~~Taibah International Aid Association~~

GROUP 7: ~~MBF Marketing, Inc.~~
~~Filter Research Corp.~~
~~Jamont Properties, Inc.~~
~~Golden Arch Travel~~

(U)

(U)

GROUP 8: ~~Muslim Arab Youth Associations (8)~~
~~Muslim Student Associations (6)~~

The various criminal violations and the scope and complexity of the subject organizations mandate multi-agency involvement in this investigation. On June 23, 1997, a meeting was held by Assistant Special Agent in Charge (ASAC) [redacted]

[redacted] concerning this investigation. Attendees included Supervisory Special Agent (SSA) [redacted] Case Agent

b6
b7C

~~SECRET~~

To: All Divisions From: Chicago
Re: 265C-CG-101942, 07/14/1997

~~SECRET~~

Robert G. Wright, Jr., Co-Case Agent [redacted] AUSA Mark Flessner, Internal Revenue Service (IRS) Agent [redacted] and INS Agent [redacted] This meeting was held to define each agency's role in this investigation, available manpower, and the direction of the investigation.

It was determined that the interviews conducted from Group 1 would include [redacted]

The Chicago IRS and INS will be the controlling field offices for their agencies during this investigation. INS Agent [redacted] has forwarded an operational plan to the Washington, D.C. office. Agent [redacted] will identify the INS Agents who will be assigned to this investigation so they may be added to the 6E Grand Jury list. In those divisions where there is no INS presence, Chicago INS Agents will assist where feasible.

IRS Agent [redacted] is working closely with the Chicago Division to [redacted] Agent [redacted] will also identify IRS Agents who will be assigned to assist other divisions with this investigation.

[redacted] Information Research Specialist (IRS), FBIHQ, is entering [redacted] into a database. [redacted] will analyze the information to [redacted]

[redacted] are aware of this investigation and have expressed a strong interest in participating. Additionally, Legat London advised that the [redacted] would also like to be involved with this investigation. [redacted] will monitor HAMAS activity in their countries when the interview phase of this investigation starts.

Information Research Specialist [redacted] Chicago Division, has been tasked with [redacted] relationships between individuals and/or organizations during this investigation. [redacted] has also been tasked with [redacted]

[redacted] is preparing information sheets which will be utilized by the interviewing agents.

~~SECRET~~

To: All Division From: Chicago
Re: 265C-CG-101942, 07/14/1997

~~SECRET~~

[redacted] and [redacted] Forfeiture Asset Seizure Team (FAST), are assisting in securing the Pete Marwick Accounting Firm for future review of [redacted] the Chicago Division anticipates receiving via Grand Jury Subpoenas. [redacted] and [redacted] are also assisting in [redacted]

b3
b6
b7C
b7E

Special Agent (SA) [redacted] is coordinating with [redacted] to obtain [redacted]

b3
b6
b7C

[redacted] SA [redacted] will also coordinate his efforts with FAST members.

SA [redacted] Co-Case Agent, is handling all Grand Jury Subpoena requests and [redacted] SA [redacted] will be working closely with the Pete Marwick Accounting Firm.

b3
b6
b7C

The goals of this investigation include, but are not limited to, identifying organizations/non-profit organizations involved in the money laundering conspiracy and tax fraud; identify businesses created and/or financed by NAIT; and to identify individuals who have contributed large sums of money to organizations in furtherance of the money laundering conspiracy, tax fraud, and INS violations. [redacted]

b7E

The following is a list of criminal violations being considered by the FBI, [redacted]

Title 18, U.S. Code	371 Conspiracy
Title 18, U.S. Code	1001 False Statements
Title 18, U.S. Code	1341 Mail Fraud
Title 18, U.S. Code	1343 Fraud by Wire
Title 18, U.S. Code	1344 Bank Fraud
Title 18, U.S. Code	1546 Fraud and misuse of Visas, permits and other documents
Title 18, U.S. Code	1956 Laundering of Monetary Instruments
Title 18, U.S. Code	1957 Engaging in monetary transaction derived from specified unlawful activity
Title 18, U.S. Code	1961 Racketeer Influenced and Corrupt Organizations
Title 26, U.S. Code	7201 Attempt to evade or defeat tax

~~SECRET~~

To: All Divisions From: Chicago
Re: 265C-CG-101942, 07/14/1997

~~SECRET~~

b7C

Forfeiture Asset

b2

Seizure Team (FAST), are assisting in securing [redacted]
Accounting Firm for future review of [redacted]

b7E

[redacted] the Chicago Division anticipates receiving via Grand
Jury Subpoenas. [redacted] is also assisting in
identifying potential assets for seizure.

b7C

Special Agent (SA) [redacted] is coordinating
with [redacted] to obtain

b2

will identify [redacted]

SA [redacted]

b7E

[redacted] SA [redacted] will also coordinate his
efforts with FAST members.

b7C

SA [redacted] Co-Safe Agent is handling all Grand
Jury Subpoena requests and [redacted] SA [redacted] will be
working closely with [redacted] Accounting Firm.

b2

b7E

The goals of this investigation include, but are not
limited to, identifying organizations/non-profit organizations
involved in the money laundering conspiracy and tax fraud;
identify businesses created and/or financed by NAIT; and to
identify individuals who have contributed large sums of money to
organizations in furtherance of the money laundering conspiracy,
tax fraud, and INS violations. A major goal for all divisions
will be to develop informants who will provide intelligence that
will allow the investigation to expand in each division.

The following is a list of [redacted]
[redacted]

b2

~~SECRET~~

To: All Divisions From: Chicago
Re: 265C-CG-101942, 07/14/1997

~~SECRET~~

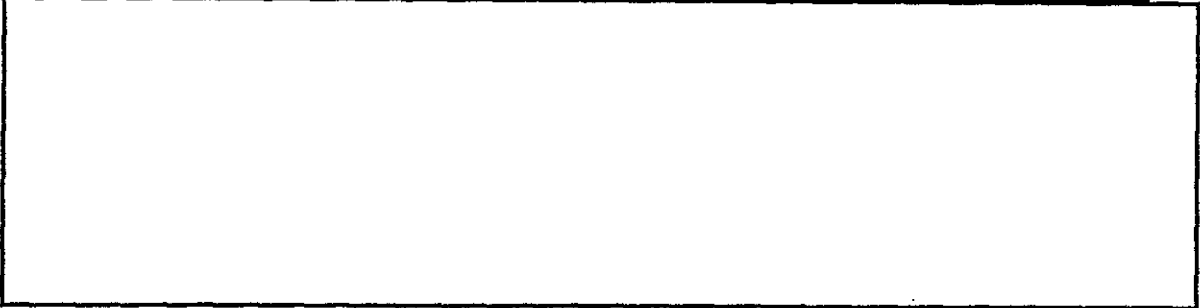
Title 26, U.S. Code	7202 Willful failure to collect or pay over tax
Title 26, U.S. Code	7203 Willful failure to file return, supply information, or pay tax
Title 26, U.S. Code	7205 Fraudulent withholding exemption certificate or failure to supply information
Title 26, U.S. Code	7207 Fraudulent returns statements or other documents

Currently, the Chicago Division anticipates 



b3
b7E

The following list of individuals who ultimately are to be interviewed 



b7E

The following is the list of individuals/organizations to be interviewed in the future:

~~SECRET~~

To: All Divisions From: Chicago
Re: 265C-CG-101942, 07/14/1997

~~SECRET~~

b2

Currently, the Chicago Division anticipates the interviews of 200 individuals/organizations throughout the U.S. Prior to the start of these interviews, the Chicago Division will assemble [REDACTED]

b2

b7E

[REDACTED] The Chicago Division, IRS and AUSA's office will [REDACTED] prior to conducting the interviews.

The following list of individuals who ultimately are to be interviewed [REDACTED]

b2

b7E

The following is the list of individuals/organizations to be interviewed in the future:

~~SECRET~~

To: All Divisions From: Chicago
Re: 265C-CG-101942, 07/14/1997

LEAD (s):

Set Lead 1:

~~SECRET~~

ALL DIVISIONS:

Each division with an interview is requested to conduct a background check on each individual to verify current address, employment, vehicle(s), and criminal history. Each division with an organization/corporation is requested to verify current address, obtain Articles of Incorporation and/or non-profit forms filed with the state in which the organization is located and identify all officers of the organization/corporation.

Set Lead 2:

ALBANY

AT ALBANY, NEW YORK

[Redacted]

Albany, NY

[Redacted]

[Redacted]

Albany, NY

[Redacted]

Set Lead 3:

AT [Redacted] NEW YORK

[Redacted]

[Redacted] NY [Redacted]

Set Lead 4:

AT SYRACUSE, NEW YORK

[Redacted]

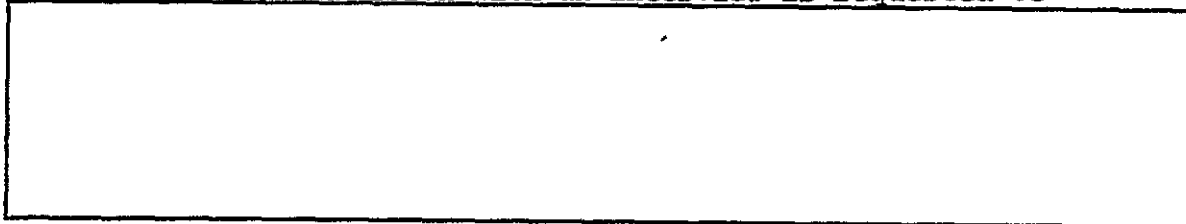
To: All Divisions From: Chicago
Re: 265C-CG-101942, 07/14/1997

LEAD (s):

Set Lead 1:

ALL DIVISIONS:

Each division with an interview is requested to

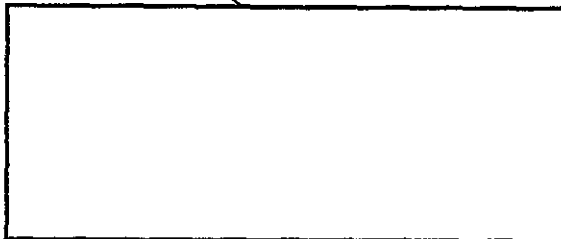


b7E

Set Lead 2:

ALBANY

AT ALBANY, NEW YORK



b6
b7C
b7E

Set Lead 3:

AT NEW HARTFORD, NEW YORK



Set Lead 4:

AT SYRACUSE, NEW YORK

Islamic Society of Central New York
General Fund
825 Comstock Avenue
Syracuse, NY 

To: All Divisions From: Chicago
Re: 265C-CG-101942, 07/14/1997

~~SECRET~~

~~SAAR Foundation
& Kurdish Relief Fund
555 Grove Street
Herndon, VA~~ [REDACTED]

~~Mar Jac Investments
555 Grove Street
Herndon, VA~~ [REDACTED]

Set Lead 146:

b6
b7C
b7E

~~AT TYSONS CORNER, VIRGINIA~~

~~Taihab International Aid Association
8150 Leesburg Pike
Suite 700
Tysons Corner, VA
Telephone (703) 883-8280~~ [REDACTED]

~~SECRET~~