

## Index of Documents

4/8/04 -- DECLARATION OF JAMAL KHALIFA .....	1
<i>(Affidavit of Mohammed Jamal Khalifa, responding to allegations in a civil suit seeking remuneration from numerous parties for complicity in al Qaeda activities and the attacks of September 11)</i>	
6/28/04 -- MEMORANDUM SUPPORTING MOTION TO DISMISS .....	4
<i>(Legal arguments in support of a motion to remove Khalifa as a defendant in the 9/11 lawsuit; accompanies above declaration.)</i>	
12/16/94 -- RECORD OF DEPORTABLE ALIEN .....	13
<i>(INS record relating to the December 1994 arrest of Mohammed Jamal Khalifa outside San Francisco, Calif., on an immigration violation. The Manila address listed is for the Benevolence International Corp., a charity Khalifa was involved in founding.)</i>	
12/16/94 -- CERTIFICATE OF VISA REVOCATION.....	19
<i>(State department record revoking Khalifa's visa "for having engaged in terrorist activity" on the same day he was arrested.)</i>	
12/20/94 -- REQUEST TO SEAL AFFIDAVIT .....	20
<i>(An affidavit related to a search warrant to examine Khalifa's luggage is sealed because it "concerns sensitive diplomatic communications between the United States and foreign nations and an ongoing investigation into international terrorism." Though unsealed later, the affidavit in question has apparently been removed from the court archives in San Francisco.)</i>	
12/20/94 -- RECEIPT OF PROPERTY PURSUANT TO SEARCH WARRANT.....	21
<i>(A barebones description of the contents of Khalifa's luggage. These items will be described in detail below in a bail hearing brief, page 56, and Benevolence International Foundation affidavit, page 130.)</i>	
12/20/94 -- SEARCH WARRANT .....	22
<i>(Originally sealed, this is the official authorization to search Khalifa's luggage, including "books, notebooks, correspondence, address books, electronic data storage devices and related documents." Among the information in the luggage was a phone number for a pager used by Wali Khan Amin Shah, which comes into play starting on page 30. See also details of materials from the luggage starting on page 130)</i>	
12/22/94 -- LETTER FROM THE AMBASSADOR OF JORDAN .....	23
<i>(Formal request to deport Khalifa so that he could face trial for his alleged role in a cinema bombing plot there. Convicted to death in absentia, Khalifa would subsequently given a new trial and cleared of the charge when a witness recanted testimony against him.)</i>	
12/23/94 -- LETTER OF PHILIP WILCOX .....	24
<i>(One of three letters written by the State Department's coordinator for counterterrorism concerning the Khalifa arrest. Despite several efforts to obtain the other two letters, they remain unavailable at press time.)</i>	

1/5/95 -- LETTER OF WARREN CHRISTOPHER TO JANET RENO.....	25
<i>(Despite its relative obscurity today, the Khalifa arrest received a great deal of attention at the highest levels of government. Here, Secretary of State Warren Christopher writes to Attorney General Janet Reno requesting that the Justice Department deport Khalifa to Jordan for foreign policy reasons.)</i>	
1/5/95 -- MEMORANDUM FOR JAMIE GORELICK.....	28
<i>(This January 5 memo informs Deputy Attorney General Jamie Gorelick that Khalifa's bond redetermination hearing is set for January 6 -- and that immediate action is required to prevent Khalifa from agreeing to be deported to Saudi Arabia and circumventing the effort to deport him to Jordan. Janet Reno was out of town on this date, and Gorelick was acting attorney general in her absence.)</i>	
1/7/95 -- LETTER FROM GORELICK TO IMMIGRATION JUDGE .....	29
<i>(Gorelick sends a letter invoking the Immigration and Nationality Act to stipulate that Khalifa may only be deport to Jordan to face trial. Within hours of this letter being sent, police in Manila entered the apartment in Manila, which was the base for Ramzi Yousef, who was plotting terrorist attacks on the U.S. along with Wali Khan Amin Shah. The plot is described in more detail starting on page 130.)</i>	
1/11/95 (via 7/30/96) -- EXCERPT FROM U.S. V. WALI KHAN AMIN SHAH .....	30
<i>(This court transcript excerpt describes how the pager number seized from Khalifa's luggage was used to capture Wali Khan Amin Shah starting on or around January 11, 1995. See page 130 for more details on Shah and the Manila plot.)</i>	
3/6/95 -- KHALIFA V. U.S. CIVIL SUIT, DOCKET .....	41
<i>(In March 1995, Khalifa sued for the return of the items seized from his luggage at the time of his address. While the suit was eventually successful, the FBI copied and kept all the data contained therein.)</i>	
3/6/95 -- KHALIFA V. U.S., PLAINTIFF'S MEMORANDUM OF POINTS .....	43
<i>(Filing by Khalifa's attorney arguing for the return of property outlined above. This gives a detailed account of Khalifa's contemporaneous response to the allegations against him.)</i>	

3/6/95 -- KHALIFA V. U.S., DECLARATION OF ATTORNEY TED CASSMAN .....	52
<i>(Affidavit of Khalifa's civil suit attorney, outlining Khalifa's version of the basic facts of the case.)</i>	
3/10/95 -- GOVERNMENT RESPONSE, BAIL DETERMINATION .....	56
<i>(This is a detailed list of government allegations regarding Khalifa, filed in response to his efforts to be released on bail. Allegations include the Jordanian claims and that Khalifa was carrying terrorist training manuals at the time of his arrest. The document also stipulates that Khalifa "listed the Bin Laden company in Saudi Arabia as his specific address when applying for a visa.")</i>	
3/24/95 -- AGREEMENT TO UNSEAL WARRANT AND RETURN PROPERTY .....	92
<i>(The U.S. Attorneys in possession of Khalifa's belongings agree to return the materials to him. By the government's account, this appears to include terrorist training manuals and contact information for Osama bin Laden, among other items.)</i>	
3/24/95 -- STIPULATION: AGREEMENT TO RETURN PROPERTY .....	93
<i>(Stipulation formalizing the return of Khalifa's property to the defendant "his attorneys, or the attorneys' representative forthwith.")</i>	
4/19/95 -- INMATE DATA RECORD: MOHAMMED JAMAL KHALIFA .....	95
<i>(According to this form, on April 19, just hours after the Oklahoma City bombing, Khalifa was transferred from a holding cell in Santa Rita County jail to a federal detention center in Dublin. According to this record, Khalifa remained in some form of U.S. custody through Aug. 31, 1995, long after he had been deported.)</i>	
4/19/95 --U.S. MARSHALS PRISONER TRACKING RECORD.....	96
<i>(This record reiterates the April 19 transfer and stipulates rather specifically -- and apparently incorrectly -- that Khalifa remained in Dublin for 134 days, through Aug. 31, 1995.)</i>	
10/5/95 --IN RE: MOHAMMED J.A. KHALIFA, IMMIGRATION APPEAL.....	98
<i>(Decision by the Executive Office for Immigration Review upholding the decision to deny bail for Khalifa. It is unclear why this decision was necessary in light of Khalifa's deportation and subsequent release in or around July 1995.)</i>	
c. 1996 --CIA REPORT ON MISUSE OF FUNDS BY ISLAMIC CHARITIES.....	105
<i>(One page is missing from this document as it was provided to INTELWIRE. It discusses charity funding to Ramzi Yousef's Manila plot, alleged elsewhere to involve Khalifa, and references the International Islamic Relief Organization, one of the charities headed by Khalifa, and references Khalifa on page 110.)</i>	

c. 1996 --KHALIFA'S NETWORK IN THE PHILIPPINES .....	117
<i>(This Philippines government document was provided to INTELWIRE by law firm Motley Rice, one of the legal teams involved in the aforementioned September 11 lawsuit. The document makes extensive allegations about Khalifa's activities in the Philippines, some of which can be verified through second independent sources, but this document is the sole source for many of the more sensational charges.)</i>	
4/29/2002 --EXCERPT, U.S. V. BENEVOLENCE INTERNATIONAL FOUNDATION.....	130
<i>(An excerpt from a 2002 affidavit regarding the Benevolence International Foundation. A cautionary note: The case was later dropped in favor of prosecuting BIF's president. The second case ended with a plea bargain for a guilty plea to charges not directly related to al Qaeda.)</i>	
4/3/2002 --INTERPOL BULLETIN REGARDING KHALIFA.....	96
<i>(The body of this document was redacted by INTERPOL.)</i>	
1/22/2007 --INTERPOL BULLETIN REGARDING KHALIFA.....	138
<i>(This message, redacted almost in its entirety, was sent to U.S. intelligence agencies just over a week before Khalifa was assassinated in Madagascar. It refers to a project "initiated to proactively target terrorism from captured terrorists.")</i>	
1/26/2007 --INTERPOL BULLETIN REGARDING KHALIFA.....	139
<i>(Just four days before Khalifa's death, this bulletin was sent to an unknown recipient by Interpol as part of an "initiative ... to obtain and share information ... proactively targeting time and terrorism and to prevent further terrorist attacks.")</i>	
1/22/2007 --INTERPOL BULLETIN REGARDING KHALIFA.....	144
<i>(This message, redacted almost in its entirety, was sent to U.S. intelligence agencies just over a week before Khalifa was assassinated in Madagascar. It refers to a project "initiated to proactively target terrorism from captured terrorists.")</i>	
1/31/2007 --INTELWIRE: LIFE AND DEATH SECRETS .....	152
<i>(Summary of key information and context for the overall Khalifa case as of January 31, with initial report of his death.)</i>	
2/16/2007 --INTELWIRE: INTERPOL TRACKED KHALIFA BEFORE DEATH .....	156
<i>(Summary and context for INTERPOL documents reprinted above.)</i>	
3/20/2007 --INTELWIRE: MURDER REPORTS FROM LOCAL NEWSPAPERS.....	158
<i>(Summary of Madagascar newspaper reports on the murder of Khalifa and subsequent police investigation.)</i>	