

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

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| UNITED STATES OF AMERICA, |) | No. 07-CR-00087-06-W-NKL |
| |) | |
| Plaintiff, |) | 18 U.S.C. § 371 (Conspiracy to Violate |
| |) | Foreign Agents Registration Act, |
| v. |) | 22 U.S.C. §§ 612 and 618) |
| |) | NMT 5 Years Imprisonment |
| ABDEL AZIM EL-SIDDIG, |) | NMT \$250,000 fine |
| |) | NMT 3 Years Supervised Release |
| Defendant. |) | Class D Felony |
| |) | |
| |) | \$100 Mandatory Special Assessment |

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material:

1. The Islamic American Relief Agency (IARA) was an Islamic charitable organization located in Columbia, Missouri, that served as the United States office of the Islamic African Relief Agency, an international organization with its principal place of business in Khartoum, Sudan and organized under the laws of Sudan. Originally, the Columbia, Missouri office of IARA was known as the Islamic African Relief Agency-United States Affiliate, or IARA-USA. On May 25, 2000, IARA legally changed its name to the Islamic American Relief Agency.

2. From at least 1990, until the present, Dr. Abdallah Sulayman Al-Awad (Al-Awad), served as Agency General Director of IARA's headquarters, in Khartoum, Sudan. In about 1990, Al-Awad transferred Mubarak Hamed (Hamed) from one of the approximately 40

overseas offices he controlled, to the IARA office in Columbia, Missouri. Hamed remained the head of the IARA office in Columbia until at least October 13, 2004.

3. At all times the IARA office in Columbia, Missouri was under the control and direction of its headquarters, in Khartoum, Sudan, and the organization was a foreign principal in that it was an association, organization or other combination of persons having its principal place of business in a foreign country, namely Sudan. At all times, the persons who incorporated IARA in Missouri, and others, concealed from the state and federal government that it was a part of a foreign organization, controlled by the foreign organization's headquarters, and organized under the laws of a foreign country.

4. On October 13, 2004, IARA along with its headquarters in Khartoum, Sudan, and five individuals located overseas, was designated a Specially Designated Global Terrorist (SDGT) by the Office of Foreign Assets Control (OFAC) in the Department of the Treasury. From that point, IARA could no longer receive contributions or use any of its property.

5. Defendant **ABDEL AZIM EL-SIDDIG**, also known as Abdel Azim El-Siddiq and Abdel Azim Elsidig, was a fundraiser for IARA, and for a time was described as its Vice-President for International Operations. On or about November 1, 2003, Defendant EL-SIDDIG opened an IARA bank account at LaSalle Bank, Chicago, Illinois, on which he had signature authority, identifying himself as President of IARA and his wife as Secretary of IARA. Defendant EL-SIDDIG used this account to transfer funds to Mark Deli Siljander (Siljander). At all times, Defendant EL-SIDDIG was aware that IARA was a part of and controlled by the organization headquartered in Khartoum, Sudan.

6. Mark Deli Siljander (Siljander) was a former member of the United States House of Representatives, and owner/director of a consulting firm, Global Strategies, Inc., a planning, marketing and public relations company incorporated in Virginia. Siljander, a friend of the Defendant EL-SIDDIG, was hired to advocate for IARA's removal from a Senate Finance Committee list of charitable organizations suspected of being involved in supporting international terrorism, and its reinstatement as an approved government contractor after having been terminated as is alleged more specifically below. At all times material, Siljander was aware that IARA was a part of and controlled by the organization headquartered in Khartoum, Sudan. At no time was Siljander licensed or registered as an agent of a foreign principal, nor did he inform the Attorney General or any of his delegates that he was working for a foreign entity.

7. In addition to other sources, IARA received funds from a series of cooperative agreements with the United States Agency for International Development (USAID), an agency within the United States Department of State, for relief projects in Mali, Africa. The agreements were terminated by USAID on or about December 19, 1999.

8. After December 20, 1999, as a result of the termination of IARA's cooperative agreement with USAID, IARA was debarred from any procurement transactions with any part of the Executive Branch of the United States government. IARA was informed that, in part, its termination and debarment was due to a determination that continuing the grant was not in the national interest of the United States.

9. On or about January 14, 2004, it was announced that IARA was included on a United States Senate Finance Committee list (“the list”) targeting the activities of charitable organizations suspected of supporting international terrorism.

10. In or around March 2004, Defendant EL-SIDDIG suggested to Hamed and IARA that Siljander was a person who could be hired to advocate for IARA’s removal from “the list,” and reinstatement as an approved government contractor, by gathering information and meeting with individuals and agencies of the United States government. Thereafter, IARA paid Siljander at least \$75,000.00 to advocate for IARA.

The Charge

11. Beginning in or around March 2004, and continuing to an unknown date but at least until December 2005, in the Western District of Missouri, and elsewhere, Defendant **ABDEL AZIM EL-SIDDIG**, and others known and unknown, knowingly and willfully conspired, confederated and agreed to commit an offense against the United States, that is, to willfully act as an agent of a foreign principal without having first registered with the Attorney General of the United States, in violation of Title 22, United States Code, Sections 612 and 618. The object of the conspiracy was to unlawfully represent the interests of a foreign principal before the United States Congress, and agencies within the Executive Branch of the United States, without disclosing such activities to the proper authorities.

Overt Acts

12. During the course and in furtherance of the conspiracy, and in order to accomplish its aims and purposes, there was committed by one or more of the conspirators, known and

unknown, at locations in the Western District of Missouri and elsewhere, at least one of the following overt acts:

- A. In or about March and April 2004, Hamad and Defendant EL-SIDDIG hired Siljander to advocate for IARA's removal from a United States Senate Finance Committee list of charitable organizations suspected of supporting international terrorism, and its reinstatement as an approved government contractor after its termination by USAID.
- B. On or about April 28, 2004, Hamed, IARA, and Defendant EL-SIDDIG agreed with Siljander to mischaracterize his efforts and relationship with IARA.
- C. On or about May 18, 2004, on behalf of IARA, Defendant EL-SIDDIG paid Siljander \$25,000.00, by means of a check, number 1005, payable to the International Foundation (with the notation indicating sub-account number 600-006, Muslim Friends).
- D. On or about June 9, 2004, Siljander received deposited check no. 7095 from IARA-USA, CEWIGAP account at Bank of America (then Boatmen's Bank), payable to the International Foundation, for approximately \$25,000.00, into the Branch Bank and Trust, account ending in 3917, for credit to the sub-account of Muslim Friends, number 600-006. This check, written in and drawn upon an IARA account in Columbia, Missouri, was hand-carried and delivered to Siljander by Defendant EL-SIDDIG, acting on behalf of IARA.
- E. On or about June 9, 2004, Siljander caused the deposit of an automated clearing house transfer (ACH) from an International Foundation account at Branch Bank and Trust for approximately \$18,337.00 to his account with Merrill Lynch.
- F. On or about September 2, 2004, Siljander deposited Check No. 7097 from the IARA-USA, CEWIGAP account at Bank of America (then Boatmen's Bank), payable to the National Heritage Foundation, for approximately \$12,500.00, into James Monroe Bank, account ending in 0602, for credit to the sub-account of "Ambassadors for Peace and Reconciliation," number 1075388. This check, written in and drawn upon an IARA account in Columbia, Missouri, was hand-carried and delivered to Siljander by Defendant EL-SIDDIG, acting on behalf of IARA.

- G. On September 2, 2004, Siljander deposited check no. 1204 from the IARA-USA, Mali Project account at Bank of America (then Boatmen's Bank), payable to the National Heritage Foundation, for approximately \$12,500.00, into the James Monroe Bank, account ending in 0602, for credit to the sub-account "Ambassadors of Peace and Reconciliation," number 1075388. This check, written in and drawn upon an IARA account in Columbia, Missouri, was hand-carried and delivered to Siljander by Defendant EL-SIDDIG, acting on behalf of IARA.
- H. On or about September 10, 2004, Siljander deposited check no. 71631 from the National Heritage Foundation, "Ambassadors of Peace and Reconciliation" sub-account, at the James Monroe Bank, payable to Global Strategies, Inc. c/o Mark Siljander for approximately \$23,000 into his Branch Bank and Trust account ending in 0128. Siljander had earlier received the funds from Defendant EL-SIDDIG who was acting on behalf of IARA.
- I. On or about November 23, 2004, Siljander deposited check no. 75141 from the National Heritage Foundation, "Ambassadors of Peace and Reconciliation" sub-account, at James Monroe Bank, payable to Mark Siljander for approximately \$1,350.00 into his account with Merrill Lynch.
- J-M. At various times in and after June, 2004, Siljander acted as a agent for a foreign principal, in that he contacted persons at USAID (J), the United States Department of Justice (K), the Senate Finance Committee (L), and the United States Department of the Army (M), in an effort to have IARA removed from the USAID list of debarred entities, and to remove IARA from the Senate Finance Committee list of charitable organizations suspected of supporting international terrorism.
- N. At various times between June 2004 up and including October 2004, Defendant EL-SIDDIG reported to Hamed and IARA on the progress of Siljander's efforts on behalf of IARA.
- O. On December 15, 2005, Siljander, in an effort to conceal his relationship with IARA , falsely denied to federal agents that he had been hired to do any work for IARA, and falsely stated that all payments were charitable contributions for his writing a book.

All in violation of Title 18, United States Code, Section 371.

BETH PHILLIPS
United States Attorney

/s/ Anthony P. Gonzalez

ANTHONY P. GONZALEZ
Assistant United States Attorney

Dated this 7th day of July, 2010
Kansas City, Missouri