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1 THE COURT: Are we all set? Mr. Al-Dani is around?

2 MR. CONWAY: He will be in two seconds after the
3 jury.

4 THE COURT: Okay. Great.

5 I want to personally thank the interpreter for
6 Mr. Al-Dani, whom I really neglected to mention yesterday,
7 but is doing equally a great job.

8 I know you weren't here earlier in the day, sir,
9 but I am sure you can get from other witnesses the
10 difficulties we had early on.

11 THE INTERPRETER: I was here.

12 THE COURT: So you saw that it just was not working
13 for us. I think that's perhaps why I was really so grateful
14 to have that problem resolved, at least as of the afternoon.
15 And for reasons that I don't really have an excuse for, I
16 didn't even mention the importance that your role plays in
17 our proceeding here as well. I really do appreciate it, and
18 you are doing a great job.

19 (Jury in at 9:50 a.m.)

20 THE COURT: You may be seated.

21 Ladies and gentlemen, when we broke yesterday we
22 were in the middle -- or at least at some point during
23 Mr. Al-Dani's direct examination, and he is going to return
24 to the stand this morning as well.

25 Mr. Al-Dani, I want to remind you that you are

1 under oath.

2 MUHAMMAD AL-DANI , GOVERNMENT' S WITNESS, PREVIOUSLY SWORN
3 DIRECT EXAMINATION - Resumed

4 BY MR. CONWAY:

5 Q. I am going to hand you Zakerya Group 1, the file you
6 were testifying about yesterday.

7 (Document tendered.)

8 BY MR. CONWAY:

9 Q. You will recall when we broke yesterday at 5 o'clock,
10 you had discussed various documents from Athens providing
11 correspondence back to Baghdad; is that correct?

12 A. Yes.

13 Q. I would like to direct you to Page 31.

14 A. Yes.

15 Q. Is that internal correspondence in Baghdad headquarters?

16 A. Yes. This is a memorandum prepared by the case officer,
17 Naser Thamer.

18 Q. I would like to start at the beginning. For the English
19 translation it says "R.05." What does that denote?

20 A. That means the gentleman, the head of Section 5.

21 Q. And you mentioned the author of that internal
22 correspondence is Naser Thamer?

23 A. Yes.

24 Q. Do you personally know him?

25 A. No.

1 Q. What is Section 5?

2 A. I believe that referred to the Assyrian section at the
3 desk of hostile activities back at that time.

4 Q. I would like to direct your attention to Page 69.

5 A. This is a letter from Athens station, No. 899, dated
6 May 17th, '85, and it was about the administration against a
7 country. It's a letter sent from the Athens station to the
8 Iraqi Intelligence in Baghdad.

9 Q. And it provides certain information about collaborator
10 Hilal Issa, correct?

11 A. Yes. The letter consists of two pages, and it talks
12 about a hostile administration, a protest. And it mentions
13 that the source is collaborator Hilal Zakerya Issa.

14 Q. I want to direct your attention to Page 30.

15 A. Yes.

16 Q. Is that a letter to the IIS in Athens from IIS
17 headquarters in Baghdad?

18 A. Are you referring to Page 30 or 31?

19 Q. 30.

20 A. No. This is a letter from the Iraqi Intelligence to the
21 Athens station.

22 Q. Right. From Baghdad to Athens?

23 A. Yes.

24 Q. Dated May 13th, 1985?

25 A. Yes.

1 Q. And what is Baghdad asking Athens to do?

2 A. The subject matter is the collaborator Hilal Issa. And
3 the letter asks the station to direct the collaborator Hilal
4 to provide them with detailed information about the Assyrian
5 party and the names of the leaderships who were in Syria.

6 Q. Why would IIS be concerned about Assyrians in Syria?

7 A. Because both regimes were ruled by the Baath party. And
8 there was a great deal of hostility between the two parties.
9 And the Syrian regime always acted to hurt the Iraqi regime
10 and vice versa.

11 Q. Let me direct your attention to Page 67.

12 A. Yes. This is a letter from Athens station, No. 946, on
13 May 24th, '85. The subject matter is newspaper. The source
14 is collaborator Hilal Issa, America. We enclose for you
15 three issues of the newspaper Immigration.

16 (In English:) Immigrant, I think, written in
17 English.

18 (Through interpreter:) Immigrant.

19 It has become clear that the individual known as
20 Ivan Kakovitch, the head of the transition Assyrian
21 government, is behind the issuance of this newspaper. And
22 most of the articles contained therein were written by him
23 personally.

24 Q. I would like to direct your attention to Page 29.

25 Is that another letter from Baghdad dated July 5th,

1 1985?

2 A. Yes.

3 Q. And again, it's providing certain information provided
4 through Hilal Issa?

5 A. Yes. It's regarding the meeting of the conference of
6 the Assyrian party, which was held on May 10th, '85, and our
7 source attended such conference, meaning that Hilal attended
8 it.

9 Q. I would like to direct you to Page 65.

10 Is that an original or photocopy piece of paper?

11 A. It's original.

12 Q. Could you show it to the jury so they can see it's an
13 original.

14 A. (Indicating.)

15 THE COURT: The record will show the witness is
16 holding up an opened copy of this file. I shouldn't say
17 "copy." This is the original file.

18 He is holding the original file up, opened, to show
19 the jurors the papers that are inside it.

20 MR. CONWAY: Thank you.

21 BY MR. CONWAY:

22 Q. Could you take a look at that and summarize the contents
23 of that document for us.

24 A. It's basically a report written by Hilal Issa on
25 July 28th, '86, in which he mentioned a partisan conference

1 on that date, which was held at 7 p.m. and was attended by
2 some comrades. Some of them were Ashur Sul ei man and Yacoub
3 Boudagh.

4 And the meeting -- during the meeting the party's
5 conflict was discussed, and it was entitled "How can we
6 organize our Assyrian nation?" And membership fees were
7 collected from the comrades. Yacoub Boudagh paid \$20 for two
8 months of membership. Ashur Sul ei man paid \$10. Hil al Issa
9 paid \$5. And Ashur Sul ei man donated the sum of \$5.

10 Q. We can stop there. We will move to Page 64.

11 Is that an internal letter at Baghdad headquarters
12 of Iraqi Intelligence Service?

13 A. Yes.

14 Q. Who is it addressed to and who is it from?

15 A. The letter is addressed to the head of the hostile
16 activity desk, the collaborator Hil al Issa. And the case
17 officer who wrote the memo is Naser Thamer. And the memo
18 mentions the collaborator Hil al Issa. It says that he is one
19 of the good collaborators and that he has connection with
20 Mr. Sami Khoshaba and is currently an American.

21 Q. What did you understand by the term "connected to
22 Mr. Sami Khoshaba"?

23 A. The Iraqi Intelligence, whenever a collaborator is
24 described as a good one and it mentions that he has a
25 connection with a particular person, that means that that

1 person is the one responsible for running the collaborator
2 and maintaining a relationship with him.

3 Q. And does it further describe the minutes of that meeting
4 that you previously testified to?

5 A. In the second paragraph it says that he tried to join
6 the Assyrian party and that he provided us with the minutes
7 of the first meeting he attended with the said party.

8 Q. Is there a suggestion as to what Athens should be told
9 at this particular point?

10 A. Yes. He says we will direct Athens station to direct
11 the source to obtain further information about the party and
12 its relationship with other Assyrian parties.

13 Q. Let me direct your attention to Page 62.

14 A. 62 and 63.

15 Q. Now, is that an original or a photocopy?

16 A. Original.

17 Q. Can you show that to the jury.

18 A. (Indicating.)

19 THE COURT: Once again, the witness is holding up
20 so the jury can see this original file, open so that the
21 internal documents can be shown to the jurors.

22 BY MR. CONWAY:

23 Q. Thank you.

24 If you look at that, who's the author of that
25 letter?

1 A. Hilal Issa Zakerya.

2 Q. And that's actually on Page 63, because it's a two-page
3 letter?

4 A. Yes. It's the same sheet on both sides.

5 Q. How does he sign his name? What does it say?

6 A. Yes. He wrote the first letter of his name, then he
7 scribbled somehow.

8 Q. Does he date it?

9 A. Yes. It's May 25, '85.

10 Q. I would like to direct your attention to Page 27.

11 A. Yes. It's one of the pages from a letter sent from
12 Athens station to the Iraqi Intelligence in Baghdad.

13 Q. If a correspondence is sent from an office to Baghdad
14 involving multiple sources, is it usual that that document
15 would be photocopied and put in different files?

16 A. Yes. Yes, that would be the normal course of business
17 because it covers more than one source.

18 Q. For example, if we had a document covering Mr. Malakha
19 and Mr. Jeto, you would expect to find the same document in
20 each file, at least a portion of that same document?

21 A. Yes, that's correct. That's how it works.

22 Q. Now, if you look, there are several names on that
23 document. If you go just past the first names, does it talk
24 about an amount of money that's being authorized to spend --
25 to be spent?

1 A. Yes. It mentions several names and suggested amounts of
2 money for several collaborators. And these monies were in
3 fact salaries paid to them by the Athens station, including
4 Hilal, who was paid \$600 a month.

5 Q. Is there a reference to a full amount of money
6 authorized to be paid by Athens?

7 A. Yes. It says that \$8,000 was approved for spending from
8 the balance of Athens station to cover the hostile Assyrian
9 activities.

10 Q. And when money is approved by a station to be spent,
11 would the money be actually sent from Baghdad to the sources,
12 or would the money be sent from Athens to the sources?

13 A. It would be paid by Athens, because every station had a
14 certain account or balance of money, and that money would be
15 used to cover intelligence activities.

16 Q. And there is a reference to the prior correspondence,
17 which is May of 1985?

18 A. Yes. It says "in reference to your correspondence
19 No. 892 dated May 2nd, '85."

20 Q. In addition to monies being authorized to be paid to
21 Hilal Issa, is there money being paid for a newspaper?

22 A. Yes. There was \$3,000 for the Hammurabi newspaper to be
23 pay to its chief editor Zuhair Shaony.

24 Q. I would like to move on to Page 58.

25 A. Yes.

1 Q. Is that a letter from IIS Baghdad to IIS Washington?

2 THE INTERPRETER: What page?

3 MR. CONWAY: 58.

4 BY THE WITNESS:

5 A. Yes. This is a letter from the Iraqi Intelligence of
6 Baghdad dated February 22nd, '86, to the Washington station
7 regarding the collaborator Hilal Issa Malakha.

8 BY MR. CONWAY:

9 Q. That document is short. Could you read it, please?

10 A. Supplementary to our correspondence 477 on February 10,
11 '86, we request that you secure contact with the
12 above-mentioned collaborator with the code word "Sami says
13 hello," and under the cover of the socialist Arab Baath
14 party -- socialist Arab Baath party.

15 Take note that he had contact with Comrade Sami
16 Khoshaba. We request that you notify us after contacting him
17 and after assessing his potentialities and his needs so that
18 we could let you know later on the amount of assistance given
19 to him. And below find his full Chicago address. And here
20 is the address written in English.

21 Q. All right. As far as the address, it refers to
22 5103 Wenchester, correct?

23 A. Yes.

24 Q. And in this document it's spelled W-e-n, not W-i-n?

25 A. What's written is N, W-e-n.

1 Q. So what is Baghdad telling Washington to do at this
2 point?

3 A. It's telling them to contact the collaborator Hilal Issa
4 and to tell him that Sami says hello and to study his
5 abilities and his needs so that headquarters in Baghdad could
6 later on evaluate the amount of assistance given to him,
7 which means that that source was connected to Comrade Sami
8 Khoshaba.

9 Q. So he was being handed off to Washington at that point in
10 time?

11 A. Yes.

12 Q. Let me direct your attention to Page 26.

13 A. Yes. This is a letter from Washington station dated
14 March 24, '86. Subject matter is Hilal Issa Malakha, and it
15 is an original copy, and it's written in my handwriting, and
16 I was the station chief, and I signed the letter myself.

17 Q. Could you hold that document up to show the ladies and
18 gentlemen that it is an original document.

19 A. (Indicating.)

20 THE COURT: Once again, the witness is showing the
21 original file materials, opened, to the jurors.

22 MR. CONWAY: Thank you.

23 BY MR. CONWAY:

24 Q. Your handwriting, your signature?

25 A. Yes.

1 Q. And this is a month after Baghdad has requested
2 Washington to act upon the file of Hilal Issa, correct?

3 A. Yes.

4 Q. And what did you tell Baghdad?

5 A. I said to them, in response to your correspondence, that
6 I assigned Comrade Adnan Admed al -Rubay' ee secretary third
7 class -- third secretary at the embassy -- at our embassy in
8 Washington, who was collaborator with the station, and that
9 he contacted the aforementioned person in accordance to the
10 directive of the headquarters in Baghdad, and we will keep
11 you informed about the results of the follow-up and our
12 evaluation thereof.

13 Q. Who is Comrade Adnan?

14 A. Comrade Adnan was an employee at the Ministry of Foreign
15 Affairs. He was a friend of mine, and he was one of the
16 collaborators with the station, and he helped us in our work.
17 And I assigned him along with other collaborators certain
18 missions.

19 Q. Directing your attention to PDF 25.

20 A. Yes. This is the original letter from the special
21 security apparatus affiliated with the presidency, which was
22 an office which reported to the president of the republic,
23 dated February 24, '86. It's addressed to the Iraqi
24 Intelligence requesting information about an individual named
25 Hilal Issa Zakerya.

1 Q. We can stop there.

2 Most of the correspondence we discussed is on
3 letterhead of embassies, like the Athens embassy or the
4 United States embassy, the Iraq embassies in those countries,
5 correct -- other countries?

6 THE INTERPRETER: I am sorry. I didn't hear you.

7 BY MR. CONWAY:

8 Q. Many of the documents you previously testified to were
9 on different letterheads of the embassies for Athens and the
10 United States?

11 A. Yes.

12 Q. This is different letterhead relating to a particular
13 security force of Saddam Hussein?

14 A. Yes. That's the normal thing in which the office of the
15 president, Saddam, was requesting information about Hilal.
16 And there should be -- there must be a certain reason for
17 them to request such information. One of such reasons could
18 be that one of Hilal's relatives was working for that office.

19 Q. In fact, why don't you just read the contents of the
20 letter so we can find out --

21 A. Please provide us with the information that you have
22 about the so-called Hilal Issa, as information indicates that
23 he is led to Lebanon then to Greece, and afterward he settled
24 in Chicago, the United States of America, since one of his
25 relatives works for us. And as soon as possible.

1 Q. And you mentioned this is an original document. Could
2 you just hold it up to the jury.

3 A. This is the original document (indicating.)

4 Q. And it's got a fancy gold border?

5 A. Yes.

6 Q. It's got an eagle on the top?

7 A. Yes. This is the symbol of the republic, and this is
8 the letterhead used by the president.

9 THE COURT: Once again, the witness is showing the
10 file to the jurors. And the page he is showing them is a
11 pale blue color with a symbol of an eagle at the top.

12 MR. CONWAY: Thank you.

13 BY MR. CONWAY:

14 Q. I would like to direct your attention to Page 24.

15 A. Yes. This is a letter from the Iraqi Intelligence, and
16 it is in response to a letter from -- that letter from the
17 president.

18 Q. Again, it's an original?

19 A. They call that a secondary original copy, because the
20 letter is issued in two original copies. The first one is
21 kept there at the headquarters, and the second one is sent to
22 the president.

23 Q. Physically, where was the Revolutionary Command Council?
24 Where would they be located?

25 A. I don't know what the physical location was, but it is

1 probably the presidential palace, because it comprises the
2 high-ranking members, and I never had the chance to go to
3 that council. And the judiciary council supervised certain
4 agencies -- certain important agencies, most important of
5 which was the intelligence service.

6 Q. Now, if you could just look at the contents of that
7 letter.

8 A. Yes.

9 Q. Would you agree with me, Mukhabbarat is asking for a
10 phone number or address so they can find more information
11 about Hilal Issa?

12 A. Yes. The Mukhabbarat is requesting his full address
13 because it is not possible to reach him without knowing his
14 complete address.

15 Q. Directing your attention to PDF Page 23.

16 A. Yes. Again, this is a letter from the presidency, which
17 contains a response to the Mukhabbarat's letter, and it
18 contains Hilal's address and his telephone number. The
19 address is written in the English language.

20 Q. And directing your attention to PDF 57.

21 A. Yes. This is a letter from the Iraqi Intelligence to
22 Washington station, dated April 3rd, '86, requesting
23 information about Hilal Issa Zakerya. And the letter
24 contains Hilal's address in English also.

25 Q. So the Revolutionary Command Council wanted information

1 on Hilal and contacted Baghdad IIS, correct?

2 A. Yes.

3 Q. Baghdad IIS requested further information as to his
4 address and phone number to do that background search?

5 A. Yes.

6 Q. Now, this is the letter from Baghdad to Washington
7 asking them to find out more information about Hilal; is that
8 correct?

9 A. Yes.

10 Q. Directing your attention to PDF 22.

11 A. Yes. This is a letter from Washington station on
12 April 23rd, '86, in response to -- the response contains
13 information about Hilal Issa Zakerya. The letter was
14 handwritten by me and signed by me in my capacity as the
15 station chief.

16 Q. Is that an original or a photocopy?

17 A. This is the original.

18 Q. Could you read your letter back to Baghdad, please.
19 Could you read the letter.

20 A. Yes.

21 The letter is a response to the letter directed to
22 the station dated April 3rd, '86, and the letter contains
23 information about Hilal.

24 This letter, the station says that Hilal is in fact
25 a resident of that address, and that Hilal is one of the

1 station sources in Chicago, and that he contacted the station
2 six months before, and that the relation is maintained with
3 him by Comrade Adnan Ahmed Al -Rubay' ee, and that Hilal used
4 to be followed up by Comrade Sami Khoshaba in Athens, and
5 that correspondence was made to him for the purposes of
6 contact, and that the desk in Baghdad has knowledge of him,
7 and they know him by the name Hilal Issa Malakha and he is
8 the same individual .

9 Q. Directing your attention to Page 21.

10 A. Yes. This is internal notification from America desk to
11 the hostile activities desk in which they send to them basic
12 information about the so-called Hilal Issa Zakerya and
13 requesting them to respond to the private security apparatus
14 because they are interested in him.

15 Q. Let me direct your attention to Page 19.

16 A. Yes. This is a letter from the intelligence service
17 dated May 15, '86, directed to the special security apparatus
18 at the presidency. And it contains a response to the letter
19 and contains information about Hilal Issa Zakerya.

20 Q. And this is Mukhabbarat's response back to the special
21 security force providing them information about Hilal Issa,
22 correct?

23 A. Yes.

24 Q. And there is certain points. Could you just go to the
25 fourth point that is being communicated. And that's actually

1 on PDF 20.

2 A. The fourth point says he is a good element and that he
3 has been cooperating with our agency since 1983, and that he
4 has provided us with good information about hostile activity
5 in America and we still maintain relationship with him.

6 Q. And who signed the letter on behalf of Mukhabbarat?

7 A. That was the assistant director of the Mukhabbarat,
8 Fadhi I Tal fig Al -Azzawi .

9 Q. I would like to direct your attention to Page 52.

10 Without talking about it, if you would just look at
11 Pages 52, 53, 54, 55.

12 A. Yes.

13 Q. That's a four-page letter?

14 A. Yes.

15 Q. And again, is that in original handwriting on the
16 original paper?

17 A. Yes.

18 Q. And could you tell us and read the first paragraph and
19 the heading.

20 A. Brotherly greetings.

21 The period of changing the person in charge has
22 lasted approximately eight months, since brother Sami
23 returned to Baghdad, to the extent that brother Adnan
24 contacted me, and also the matter regarding sending reports
25 to an address other than the embassy's and that's considering

1 the work secrecy, until I received the new address about four
2 days ago.

3 Q. If you could turn to Page 55, which is the last page of
4 the letter.

5 A. Yes.

6 Q. Who signed that?

7 A. Hilal Zakerya.

8 Q. And again, that's original handwriting?

9 A. Yes.

10 Q. Original piece of paper that it was written on, not a
11 photocopy?

12 A. Yes.

13 Q. I would like to direct your attention to PDF 17.

14 A. Yes.

15 Q. Is that another handwritten original letter?

16 A. No. This is a copy.

17 Q. On the copy, if you look at the top, what's the date and
18 what's the heading for that letter?

19 A. The headline says "The Assyrian Party." The date is
20 August 15, '89 -- '79.

21 Q. And again directing your attention to Page 11.

22 A. Yes.

23 Q. Is that a photocopy or original?

24 A. Copy.

25 Q. What's the date on that?

1 A. The date is July 10th, but no year is mentioned, because
2 it's only a number.

3 Q. What is the title on that letter?

4 A. "The Assyrian Party."

5 Q. Directing your attention to Page 56.

6 A. Yes.

7 Q. And again, is that an original or a photocopy?

8 A. This is original.

9 Q. Who signed it?

10 A. There is no signature in the real sense. There is
11 only -- the name of Hilal Issa is written along with the
12 date.

13 Q. The date is July 28th, 1986?

14 A. Yes.

15 Q. Without reading it verbatim, is that about another
16 meeting that was held?

17 A. Yes.

18 Q. Directing your attention to Page 51.

19 A. Yes. This is a page written by the diplomatic
20 collaborator Adnan Ahmed Al -Rubay' ee, and it is directed to
21 me, Comrade Muhammad, as the station chief.

22 Q. Does it say Muhammad Adai?

23 A. Yes.

24 Q. That's how you were referred to internally?

25 A. Yes. It's a letter sent to me in which he describes the

1 relationship with Hilal and the developments of communication
2 with him.

3 Q. And that he received information from Hilal?

4 A. Yes.

5 Q. I would like to direct your attention to Page 49.

6 A. Yes. This is a letter from Washington station dated
7 September 24, '86, regarding collaborator Hilal Issa Malakha.
8 It's directed to the intelligence service in Baghdad, and
9 it's handwritten by me and signed by me.

10 Q. Is that an original or a photocopy?

11 A. This is original, not a copy.

12 Q. Could you tell us what you were advising Mukhabbarat
13 back in Baghdad in that letter?

14 A. We notified them that communication with Hilal was
15 maintained or handled by Comrade Adnan Ahmed Al -Rubay' ee and
16 about the magazines he provided us with in connection with
17 the Assyrian party's activities.

18 And a copy of the trial in connection with the
19 assassination of Bishop Esha Shimon, 23, the patriarch of the
20 East. And in the letter, we mention that Hilal himself said
21 that Sami was paying him \$600 a month for salary. And the
22 station was suggesting that he did not deserve all that money
23 and that we should instead pay him according to the quality
24 of the information he provided.

25 Q. We are going to stop there, just because the translation

1 there is signatures on Page 50.

2 A. Yes.

3 Q. Again, you personally signed that letter?

4 A. Yes, that is my signature.

5 Q. You didn't think Hilal was worth \$600, did you?

6 A. Correct.

7 Q. Let me direct your attention to Page 10.

8 A. Yes. This is an internal memorandum inside the Iraqi
9 Intelligence directed to the chief of the minority party
10 section. The subject matter is Hilal Issa Malakha. And the
11 letter discusses a letter from Washington station and that
12 the Iraqi Intelligence headquarters supports or endorses the
13 suggestion of Washington station. In the light of the
14 information quality, we should determine the salary that he
15 actually deserves.

16 And the memorandum is written and signed by the
17 case officer Adel Saleh Muhammad. He is the head of the
18 Assyrian unit.

19 Q. Do you personally know Adel Saleh Muhammad?

20 A. Yes, I know him well, and he visited me while I was
21 Washington station chief.

22 MR. CONWAY: I think we are done with this file,
23 Judge.

24 THE COURT: Should we take a short recess?

25 We will take a ten-minute recess.

1 So you know, Ladies and gentlemen, our lunch break
2 today is going to be about 12:05. I need to take a little
3 bit earlier than I normally would. So we will take a short
4 break now and then we will go on with, I guess, maybe another
5 file.

6 Mr. Al -Dani , you remain under the direction not to
7 discuss your testimony.

8 THE WITNESS: Yes.

9 (Jury out at 10:52 a.m.)

10 MR. THEIS: Your Honor, when will we be coming back
11 from lunch?

12 THE COURT: About 1:30. Is that all right?

13 MR. THEIS: Great.

14 THE COURT: Good.

15 Any problems with this interpreter? I know she
16 switched in at some point this morning.

17 MR. THEIS: As long as Ms. Ishoo and --

18 THE COURT: Mr. Latchin are satisfied.

19 Any problems with Ms. Jajo, Mr. Latchin?

20 THE DEFENDANT: No.

21 THE COURT: Wonderful. It is so good to have you
22 here. Really, really helps. I know Ms. Kindo may have a
23 scheduling issue next week, so it's very good not to have one
24 person just totally responsible. So thank you.

25 I am going to ask that you be sworn. Can I ask you

1 to raise your right hand.

2 (Interpreter Ruwyda Jajo sworn.)

3 THE COURT: Thank you very much. Okay. Great.

4 (A brief recess was taken at 10:55 a.m.)F

5 (Jury in at 11:12 a.m.)

6 THE COURT: You may be seated. We will proceed.

7 You remain sworn, Mr. Al -Dani . I will ask that you
8 be seated.

9 You may proceed, Mr. Conway.

10 MR. CONWAY: Thank you, Judge.

11 BY MR. CONWAY:

12 Q. I am going to provide you Government Exhibit Jeto
13 Group 11.

14 (Document tendered.)

15 BY THE WITNESS:

16 A. Yes.

17 BY MR. CONWAY:

18 Q. What is that?

19 A. This is a file that belongs to one of the Iraqi
20 Intelligence collaborators, the collaborator Adwar Mi kho
21 Jeto, San Diego.

22 Q. I would like to direct your attention to PDF 2-25.

23 A. Yes. This is a letter from the Iraqi Intelligence in
24 Baghdad directed to Washington station, dated November 5,
25 '84. Subject matter is Adwar Mi kho Jeto.

1 Q. Sir, they are numbered 1 dash, and then 2 dash, and
2 3 dash. I'm looking for 2-25. Let me see if I can help you.

3 A. Yes. This is a letter from Athens station dated
4 November 5, '82. It contains a request for information about
5 Adwar Mikho Jeto and provides his address in Baghdad, meaning
6 the address of his family.

7 Q. What is that address?

8 A. The address is Baghdad, Battawiyyeen, near Gencia
9 Street, house No. 17.

10 Q. And that letter is dated November 5?

11 A. Yes.

12 Q. Let's move up to January of 1983, PDF 2-18.

13 A. Yes. This is a letter from the Iraqi Intelligence dated
14 January 17th, '83, directed to the general security agency --
15 directorate -- general security directorate requesting
16 information about the Iraqi national Adwar Mikho Jeto.

17 Q. Is the directorate of security, is that part of the
18 Mukhabbarat, or is that somewhere else?

19 A. It's an independent agency that handles security matters
20 inside Iraq.

21 Q. Inside the Mukhabbarat as well?

22 A. No, no. It's an independent agency that has nothing to
23 do with Mukhabbarat.

24 Q. The Mukhabbarat is asking this agency to do a background
25 check, if you will, on Mr. Jeto?

1 A. Yes.

2 Q. And do they operate outside the country of Iraq or just
3 internally?

4 A. Only inside Iraq.

5 Q. So they wanted to find out about his family?

6 A. Yes.

7 Q. Directing your attention to 2-13.

8 A. Yes. This is a letter from Athens station dated
9 March 24th, '83, in which it refers to and responds to
10 letters from the intelligence in Baghdad. And the Athens
11 station states that the aforementioned person, meaning Adwar
12 Mikho, is currently an American in Chicago and that they have
13 his address. And it says that because of certain
14 circumstances, he moved to California and that they would
15 obtain his address there and his telephone number.

16 Q. This letter is in March of 1983, correct?

17 A. Yes.

18 Q. We are going to move to December of 1983.

19 I direct your attention to 2-11.

20 A. Yes. This is also a letter from Athens station to the
21 Iraqi Intelligence in Baghdad dated December 7, '83, in
22 response to their letter and also providing them with the
23 collaborator's in San Diego telephone number.

24 Q. Again, this is coming from Athens, not from Washington?

25 A. Yes.

1 Q. Let me direct your attention to 2-7.

2 A. Yes. This is an internal memorandum directed to the
3 desk 9 chief, and that's America desk. The case officer is
4 Shaker Abdel Qader. And the subject is Adwar Jeto.

5 Q. Do you know Shaker Abdel Qader?

6 A. Yes, I know him well.

7 Q. How do you know him?

8 A. He was one of my officers at the desk.

9 Q. When you say this is internal, this is a document from
10 one part of Mukhabbarat to another part of Mukhabbarat in
11 Baghdad?

12 A. It's internal in the sense that it is within the same
13 desk, written by the case officer to the desk chief.

14 Q. Could you just summarize the information provided.

15 A. Yes. The memorandum contains information about Adwar
16 Mi kho Jeto.

17 First it mentions that he used to reside in Greece
18 and that he had the relationship with Athens station, and
19 that Athens station intended to utilize his services. And
20 that the Iraqi Intelligence obtained information about him
21 from inside the country, and that he left Greece for America.

22 Q. Okay. Are there certain recommendations in that letter
23 from the case officer to his boss?

24 A. Yes. The case officer suggests to the desk chief to
25 write to Athens station to inform them about the person who

1 was handling the aforementioned individual, and to inquire
2 with the person who was handling him about his opinion of
3 him.

4 Q. So the case officer in Baghdad wants information to find
5 out who the case officer is in Athens?

6 A. Yes. And that after obtaining the information, they
7 should write to Washington station to contact him.

8 Q. I would like to direct your attention to PDF 2-15.

9 A. Yes. This is a letter from Athens station to the
10 intelligence in Baghdad dated January 11, '84, regarding
11 collaborator Adwar Mikho Jeto.

12 Q. And at the bottom of that letter, is there an opinion by
13 the branch?

14 A. Yes. It says "opinion of the desk," meaning opinion of
15 the station.

16 Q. Could you read that, please.

17 A. Yes.

18 After maintaining the relation with the
19 aforementioned person by Comrade Sami Khoshaba -- and M. M. Sh
20 was in Greece. That's the abbreviation of the desk chief,
21 but they did not specify his name. And it says that he was
22 in Greece. And it says that during his presence in Greece as
23 well as his presence in America, as the relationship with him
24 is still going on and communicating him is done through
25 telephone.

1 Q. That's fine.

2 Why don't we move on to Page 2-3.

3 A. Yes. This is a letter from the Iraqi Intelligence in
4 Baghdad from America desk dated June 2nd, '84. Subject
5 matter is the Assyrian Adwar Mikho Jeto. And the letter
6 contains information about Adwar.

7 Q. This one is short enough, I would like you to read it.

8 A. The letter is two pages long.

9 Q. Well, start.

10 A. The letter contains several paragraphs about the
11 Assyrian Adwar Mikho Jeto. It says he is an Iraqi resident
12 of United States of America, city of San Diego.

13 The said person used to reside in Greece in
14 preparation for his immigration to America, and that he there
15 had a relationship with Comrade Sami Khoshaba, the public
16 affairs office member in Athens under the party's government.

17 Comrade Sami Khoshaba's information about him
18 indicates that he is loyal to his country and he carries
19 animosity and hatred to all those who have hostility to
20 Assyrian Iraqis who work for the hostile Assyrian
21 organizations abroad. And he considers them merchants who
22 are only seeking their personal interest.

23 Q. You can move to No. 4 at this point.

24 A. The fourth point, the relationship with him is still
25 ongoing currently through Comrade Sami Khoshaba, since he

1 contacts the said person regularly by telephone, and the said
2 person sends the pamphlets and the hostile magazines
3 published in America.

4 Q. Are there suggestions then that are numbered as to what
5 should be done?

6 A. Yes, there are three recommendations.

7 Q. Just read No. 1.

8 A. To secure contact with the above-mentioned individual by
9 a representative of the public affairs office by the members
10 of the embassy and to instruct him that his communication
11 with you should be direct, and that there is no reason to
12 contact Comrade Sami Khoshaba.

13 Q. I would like to direct your attention to 1-28. 1-28.

14 A. This is Page 28. Is that the page you are asking?

15 Q. Yes, please.

16 A. Yes. This is a letter from Washington station on
17 August 9th, '84, directed to the Iraqi Intelligence in
18 Baghdad. And the subject matter is to secure contact.

19 Q. Let's stop for a moment.

20 Now, again, this is at the time that correspondence
21 is being sent on letterhead through India, correct?

22 A. Yes.

23 Q. But again, this is just sent from the Iraqi embassy in
24 Washington?

25 A. Yes.

1 Q. Is that document original or photocopy?

2 A. Copy.

3 Q. Do you recognize the handwriting or signature?

4 A. Yes. It's my handwriting. I handwrote it. And the
5 signature belongs to Mowafiq Al -Ani , the station chief.

6 Q. Again, this is the transition period when you were going
7 to become the number one person and take over from
8 Mr. Mowafiq Al -Ani ?

9 A. Yes.

10 Q. And what are you telling Baghdad?

11 A. It's a response to their letter. And I was telling them
12 that we did what we were supposed to do, as we assigned the
13 Comrade Ma'an Ahleel , one of the Iraqi Interests Section
14 members in Washington. And he is one of the good comrades at
15 the section, and that he currently holds the position of
16 embassy security officer. We will keep you informed about
17 the results of our communication regularly.

18 Q. To the outside world, Comrade Ahleel would look like a
19 security officer at the embassy?

20 A. He is an employee of the Ministry of Foreign Affairs,
21 like any other employee. But in every Iraqi embassy, one of
22 the employees was selected to be the embassy security
23 officer. He in fact had no -- had nothing to do with the
24 security.

25 Q. Did he have anything to do with the foreign ministry, or

1 was he just working for Iraqi Intelligence?

2 A. No. He is primarily working for the Ministry of Foreign
3 Affairs, but he is also a collaborator with the intelligence.

4 Q. And you were tasking him with finding Mr. Jeto in
5 America, correct?

6 A. Yes.

7 Q. I would like to direct your attention to 1-27.

8 A. Yes. That's Page 27.

9 Q. Page 27.

10 A. It's a letter from the Iraqi Intelligence to Athens
11 station dated December 24th, '84. The subject matter is to
12 secure contact, in which the intelligence in Baghdad is
13 informing the station of Athens that the contact with the
14 collaborator Adwar Mikho Jeto has been secured by the
15 Washington station, and they request them to urge him to
16 cooperate with comrades in America in the case he contacts
17 Comrade Sami Khoshaba.

18 Q. Directing your attention to 1-26.

19 A. Yes. This is a letter sent from the Washington station
20 to the intelligence in Baghdad about Adwar Mikho Jeto in
21 response to their letter.

22 Q. Whose handwriting is that letter in?

23 A. My handwriting.

24 Q. For whose signature?

25 A. It's signed by the station chief, Mowafiq Al -Ani .

1 Q. Are you just advising Baghdad that you were just
2 starting a relationship with Mr. Jeto?

3 A. Yes.

4 Q. I would like to direct your attention to 1-24.

5 A. Yes.

6 Q. This is another letter from Washington to Baghdad?

7 A. Yes. This is a letter from Washington to Baghdad dated
8 December 6, '84, about Adwar Mi kho Jeto.

9 Q. By this time had you obtained the status of being the
10 station chief in Washington?

11 A. No, I was not the chief yet. I think Mowafiq was still
12 the chief, but I believe that at certain times I was acting
13 as the real chief even when Mowafiq was still the chief, and
14 especially at the times he was away.

15 Q. Whose handwriting is that particular letter in?

16 A. My handwriting and my signature.

17 Q. And for your signature, do you write underneath it, or
18 is it just your -- as we described, a scribble?

19 A. The writing down there says it's the station chief.
20 Literally, the public affairs office director.

21 Q. And right above that in the scribble, that's your
22 scribble?

23 A. Yes.

24 Q. Again, you are just providing communication back about
25 Mr. Jeto to Baghdad?

1 A. Yes.

2 Q. Let me direct your attention to PDF 1-17.

3 A. Yes.

4 Q. Again, 17 is Page 5 of a larger letter; is that correct?

5 A. Yes.

6 Q. And whose handwriting is that?

7 A. This handwriting belongs to one of the officers who
8 worked for me, Younis Ihlail Alawi.

9 Q. And do you recognize this handwriting because you worked
10 with him?

11 A. Yes.

12 Q. You would direct him to write letters on your behalf?

13 A. Yes.

14 Q. Now, this is the very last page of the letter.

15 Whose signature is that?

16 A. It's my signature.

17 Q. I am going to sort of do this in reverse, but if you go
18 to Page 16, which would be Page 4 of the letter --

19 A. Yes.

20 Q. -- and for reference No. 10, is that referring to
21 Mr. Jeto?

22 A. Yes.

23 Q. And again, you are advising Baghdad of contacts or
24 attempted contacts with collaborators?

25 A. Yes.

1 Q. Di recting your attention to 1-15.

2 A. Yes.

3 Q. Are there names of other collaborators?

4 A. Yes, there are four.

5 Q. Can you just tell us the names.

6 A. Sargon Adam Dinkha, Zuhair Shaony, Sargon Zumaya, and
7 Mary Oraha.

8 Q. And di recting your attention to Page 14.

9 A. Yes.

10 Q. Are there additional names of collaborators?

11 A. Yes, there are three of them.

12 Q. And their names?

13 A. Hilal Issa Malakha, Jamal Kareem Odi sho, William George
14 Potros.

15 Q. And di recting your attention to Page 13.

16 A. Yes.

17 Q. That's actually the front of the document, correct?

18 A. Yes.

19 Q. It refers to the fact that you sent this from Washington
20 to Baghdad May 7th of 1986?

21 A. Yes.

22 Q. And again, you were advising Baghdad of collaborators
23 that you were tasked with attempting to contact?

24 A. Yes.

25 Q. Let me direct your attention to 1-20.

1 A. Yes.

2 Q. That's an internal letter from whom to whom at Baghdad
3 headquarters?

4 A. Yes. This is an internal letter directed to the chief
5 of minority section by the case officer, Adel Saleh Muhammad.
6 He was the officer of the Assyrian unit.

7 Q. And could you just read bullet point No. 2.

8 A. The subject matter of the memo is Adwar Mikho Jeto.

9 The second paragraph indicates that the
10 aforementioned was recruited as a collaborator by Comrade
11 Sami Khoshaba when the aforementioned person resided in
12 Athens, and that was in 1982.

13 Q. Is there a recommendation at the end of that letter as
14 to what should be done with him?

15 A. Yes. Considering that he did not provide any quality
16 intelligence information, the case officer suggests to remove
17 his name from the collaborators' list and to maintain his
18 file at the archives, because he is not useful.

19 Q. Thank you. I am done with that file, sir.

20 Let me show you Government Exhibit Potros Group 1.

21 (Document tendered.)

22 BY MR. CONWAY:

23 Q. What is that?

24 A. This is the agent William George Potros' San Diego file.

25 Q. I would like to direct your attention to 3-15.

1 A. Yes. This is a letter from Athens station on
2 November 5, '82, to the Iraqi Intelligence in Baghdad
3 regarding the Iraqi national William George Potros.

4 Q. Does it provide particular personal information about
5 William Potros in this letter?

6 A. Yes.

7 Q. And does it provide an address in Baghdad?

8 A. Yes.

9 Q. Again, this would be his family house?

10 A. Yes.

11 Q. What is the address?

12 A. The address is Baghdad, Kadhi mi yya, Al -Hurri a
13 neighborhood, and the house number is 17/403.

14 Q. Does it also give a short biography of Mr. Potros?

15 A. Yes.

16 Q. And what is Athens advising Baghdad about Mr. Potros?

17 A. It requests information and inquires about opinion
18 regarding utilizing him.

19 Q. And does it provide information about where he attended
20 college?

21 A. Yes. He is a graduate of faculty of science division of
22 chemistry -- chemistry division -- chemistry department, and
23 that he worked as a high school teacher.

24 Q. I would like to direct your attention to 3-11.

25 A. Yes. This is also a letter from Athens station to

1 Baghdad containing a report from George Potros.

2 Q. Does it advise what the contents of the report are?

3 A. Yes. It's about those who are followers of Christianity
4 among the Assyrian Iraqis in Athens.

5 Q. And it advises that it's a two-page report?

6 A. Yes.

7 Q. I would like to direct your attention to 2-29.

8 A. Yes.

9 Q. Is that another communication from Athens to Baghdad IIS
10 on the very same day?

11 A. This is a letter from Athens station dated November 29,
12 1982. The letter contains a study submitted by the
13 collaborator William George about the reasons why Assyrian
14 Iraqis migrate, and Christians.

15 Q. And it describes the inner communications, a nine-page
16 report?

17 A. Yes.

18 Q. Let me direct your attention to 3-12.

19 A. Yes.

20 Q. Is that another letter from IIS Athens to Baghdad IIS on
21 the very same day, November 29th, 1982?

22 A. Yes.

23 Q. And it describes a further communication provided by
24 Mr. Potros, correct?

25 A. Yes.

1 Q. What is the contents of his communication?

2 A. The letter contains a report of the William Potros --
3 collaborator William Potros' report about the situation of
4 Iraqi immigrants in Greece.

5 Q. I would like to direct your attention to 3-10.

6 A. Yes.

7 Q. Again, is that another communication from Athens IIS to
8 Baghdad IIS on that same date?

9 A. Yes.

10 Q. And again, it's providing a cover letter for information
11 being provided by Mr. Potros?

12 A. Yes.

13 Q. What is the communication being provided by Mr. Potros?

14 A. Athens station is hereby sending a four-page report, the
15 report from collaborator William George Potros regarding the
16 Assyrian migration to Australia.

17 MR. CONWAY: Your Honor, this is the time I think
18 you wanted to break.

19 THE COURT: Well, actually five after. So another
20 ten minutes and then we will take a break.

21 BY MR. CONWAY:

22 Q. Then let me direct you to 2-18.

23 A. Yes.

24 Q. And is that an original or a photocopy?

25 A. This is original.

1 Q. Could you read it to us, please.

2 A. The subject matter is the Assyrian association
3 pamphlet -- Assyrian Alliance pamphlet. The collaborator
4 William was able to steal another pamphlet from the three
5 pamphlets or flyers put by -- put on the casino walls, the
6 Iraqi casino walls, Egalio, regarding the alliance's 14th
7 convention in Canada.

8 Q. And there is a signature on that page, isn't there?

9 A. Yes.

10 Q. Do you recognize that signature?

11 A. No, I can't recognize that signature.

12 Q. When we say "signature," we are referencing what we will
13 describe as a scribble. There is no further denotation of
14 the author of that page?

15 A. Well, those who work closely with that individual who
16 signed would recognize the signature.

17 Q. You just don't?

18 A. I don't.

19 Q. I direct your attention to 2-20.

20 A. Yes. This is a letter from the Iraqi Intelligence in
21 Baghdad to Athens station on April 14th, '83, which they
22 request the station to scrutinize information provided by the
23 source William George to verify information with other
24 sources, considering that the level of trusting him is weak.

25 Q. So Baghdad is asking Athens to check out Mr. Potros,

1 correct?

2 A. Yes.

3 Q. Because they want to be assured he could be a trusted
4 collaborator?

5 A. Yes.

6 Q. Who signed that letter?

7 A. I know that this is Ahmad Adib Al -Hadi Al -Jaafari , who
8 was the Europe desk chief.

9 Q. And do you know that because of the designation below
10 the scribble, or do you know the scribble?

11 A. No. First of all , he is a friend of mine, and we worked
12 together for several years. And he is one of the senior
13 officers, and his signature is distinguishable.

14 Q. Is there a further note on direction on that letter?

15 A. Yes. It's written on the letter, "notify Comrade Sami ."

16 Q. I would like to direct your attention to 2-17.

17 A. Yes.

18 Q. Is that another letter from Athens to Baghdad dated
19 May 11th, 1983?

20 A. Yes.

21 Q. Enclosing a two-page report from Mr. Potros?

22 A. Yes.

23 Q. And what is the subject matter?

24 A. The collaborator William George provided us with a
25 report that he prepared about the social circumstances --

1 social and psychological -- the social and psychological
2 circumstances led by the Iraqi immigrants with the reasons
3 about why they do not travel by the aid of the appropriate
4 organizations.

5 Q. I would like to direct your attention to 3-16.

6 A. Yes.

7 Q. Is there a photo attached to that document?

8 A. Yes. It's a six-page report.

9 Q. Is there a photograph on that, 3-16?

10 A. Yes. This is an application for -- containing
11 information about collaborators.

12 Q. Now, there is a photograph on that document, correct?

13 A. Yes.

14 Q. How is it affixed to the document?

15 A. Stapled to the document.

16 Q. Could you hold it up so the ladies and gentlemen of the
17 jury can see the photo.

18 A. (Indicating.)

19 Q. Okay. Thank you.

20 Is it unusual to obtain photographs and personal
21 information of collaborators?

22 A. No. This is a normal course of business. We were
23 supposed to obtain personal information and personal photos
24 of the collaborators. But that depends on the circumstances.
25 On certain circumstances the intelligence could not be able

1 to obtain a personal photo, and that's why many files do not
2 contain personal photos.

3 Q. I would like you to look at the top of that.

4 What is the title of that document?

5 A. "Collaborator's card, top-secret."

6 Q. And does it provide a name for the collaborator right
7 below that?

8 A. Yes.

9 Q. It provides his ethnicity?

10 A. Yes.

11 Q. And that's Chaldean?

12 A. Yes.

13 Q. Citizenship, Iraq?

14 A. Yes.

15 Q. It provides where he was born?

16 A. Yes, '56, Baghdad.

17 Q. Educational information?

18 A. Yes.

19 Q. Directing your attention to bullet point No. 12, what
20 information is being provided for Mr. Potros?

21 A. Names of relatives.

22 Q. Are there certain relatives listed?

23 A. Yes.

24 Q. Again, why is it important for the Mukhabbarat to have
25 information on relatives of collaborators?

1 A. Yes. Mukhabbarat is interested in knowing everything
2 about collaborators, his relatives, his weak points, his
3 strong points. Everything about him.

4 Q. If you go to 15, it even gives his height, doesn't it?

5 A. Yes.

6 Q. I would like to direct you quickly to 3-17.

7 Is that the second page of that document?

8 A. Yes.

9 Q. And directing you to bullet point 23.

10 Does it provide the name of the officer who is
11 presently managing the collaborator?

12 A. Yes. It mentions the name of the officer handling the
13 mo'min, and he is Sami Khoshaba Latchin.

14 Q. This is slightly different, because in the other
15 documents he is referenced as Sami Khoshaba?

16 A. Yes. That's a normal practice. It's enough to write
17 the double name only.

18 Q. And this document is dated at the bottom, June 30th,
19 1983?

20 A. Yes.

21 MR. CONWAY: Your Honor, now I think it's time.

22 THE COURT: It is time now for us to take a recess.

23 Ladies and gentlemen, we are going to take a little
24 longer recess today. We will be back about 1:35. So about
25 an hour and a half. You have a little bit more time today.

1 We are making good progress, so I just want to
2 reassure you that I think we are moving along very smoothly.

3 Thank you, Mr. Al -Dani . I want to remind you not
4 to discuss your testimony.

5 Thank you.

6 (Jury out at 12:07 p.m.)

7 (A luncheon recess was taken at 12:07 p.m.)F

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

4	UNITED STATES OF AMERICA,)	
5	Plaintiff,)	Docket No. 04 CR 661
6	vs.)	
7	SAMI KHOSHABA LATCHIN,)	Chicago, Illinois
8	Defendant.)	April 4, 2007 1:45 p.m.

VOLUME 2
TRANSCRIPT OF PROCEEDINGS - Trial
BEFORE THE HONORABLE REBECCA R. PALLMEYER, and a jury

APPEARANCES:

12	For the Plaintiff:	HON. PATRICK J. FITZGERALD UNITED STATES ATTORNEY BY: MR. JAMES M. CONWAY MS. VICTORIA J. PETERS 219 South Dearborn, 5th Floor Chicago, Illinois 60604
16	For the Defendant:	FEDERAL DEFENDER PROGRAM BY: MS. MARY HIGGINS JUDGE MR. WILLIAM H. THEIS 55 East Monroe Street, Suite 2800 Chicago, Illinois 60603
19	Also Present:	S/A Joel Robertz, FBI S/A Amy Beuschlein, FBI Ms. Irene Ishoo, Interpreter Ms. Angel Kindo, Interpreter Ms. Ruyda Jajo, Interpreter Mr. Marwan Abdel-Rahman, Interpreter
23	Court Reporter:	FRANCES WARD, CSR, RPR, FCRR Official Court Reporter 219 S. Dearborn Street, Suite 2118 Chicago, Illinois 60604 (312) 435-5561 frances_ward@il.nd.uscourts.gov

1 THE COURT: You may be seated, Ladies and
2 gentlemen.

3 You may resume the witness chair, sir, and a
4 reminder that you are under oath.

5 You may proceed, Mr. Conway.

6 MUHAMMAD AL-DANI , GOVERNMENT' S WITNESS, PREVIOUSLY SWORN

7 DIRECT EXAMINATION - Resumed

8 BY MR. CONWAY:

9 Q. Sir, I placed before you the file of collaborator
10 William Potros that we were talking about before we broke for
11 lunch.

12 I would like to direct your attention to 4-30.

13 A. Yes.

14 Q. Is that an original or a copy?

15 A. This is original .

16 Q. And could you read it to us, please.

17 A. The subject matter is travel report.

18 I will travel to the United States of America to
19 stay and live there on Friday corresponding with
20 September 23rd, 1983. And in order that my communication
21 with you remain sustained, I will provide you with my new
22 address in the United States of America.

23 And down here the address is written along with a
24 telephone number in English.

25 Q. And the address is Toledo, Ohio?

1 A. Yes.

2 Q. Signed by William?

3 A. Yes, the name "William" only is written along with his
4 signature, and the date is September 21st, 1983.

5 Q. So he wrote this letter two days before the planned
6 travel to the United States; is that correct?

7 A. Two days, yes.

8 Q. Let me direct your attention to 4-31.

9 A. Yes. This also is a report regarding the Iraqi national
10 Ali Abu Alaa. The report contains information which says
11 William has provided me with information about the so-called
12 Ali Abu Alaa who currently is selling visas to Canada and
13 America in return for very large amounts of money. And he
14 has a considerable amount of activity in that regard.

15 In addition to that, he possesses a very high
16 financial capacity, and his car is a Mercedes.

17 Q. Is there another communication directly below that
18 addressed to the Honorable Comrade Muhammad?

19 A. Yes, the Honorable Comrade Muhammad. The information
20 submitted to us from our collaborator William George. It was
21 before I met Ali Abu Alaa, and he was in fact involved in
22 this mission. And he eventually stole the money that
23 belonged to individuals whom were traveling by his assistance
24 and he left for Yugoslavia.

25 Q. Is there a scribble signature at that point?

1 A. Yes, it's a signature without the name.

2 Q. And do you recognize the scribble?

3 A. I am not 100 percent sure, but I am inclined to believe
4 that it's probably the signature of Khaled Al-Sammarai'e.

5 Q. Pardon me?

6 A. Khaled Al-Sammarai'e.

7 Q. And why do you have that opinion?

8 A. Because Khaled used to be one of my officers who worked
9 for me at Athens station -- Athens desk, and he was a member
10 of Athens station, and this signature looks like his.

11 Q. But you are not sure?

12 A. Correct.

13 Q. And directly below that, is there another communication?

14 A. In the red ink on the right-hand side, there is further
15 communication entitled "Comrade Sami." As you know, we
16 requested information from the headquarters about Ali, and we
17 will send this information and whatever else develops after
18 we learn the center's opinion.

19 Q. And there is a series of other signatures and the final
20 date is September 30th of 1983?

21 A. Yes.

22 Q. I would like to direct your attention to 4-33.

23 A. Yes.

24 Q. And who is that from and who is it to?

25 A. This is a letter from the general security directorate

1 to the intelligence agency in Baghdad, which contains
2 information. And the date of the letter is December the 3rd,
3 '83. And it contains information about an individual named
4 William George Potros.

5 Q. I would like you to go to bullet point No. 6.

6 A. Yes. Now outside the country, as he had in the past
7 traveled in a legitimate way at his own expense. And he
8 hasn't returned until now. And the reference to the house is
9 occupied by his brothers, and they are --

10 Q. We will go through them. But if you look through the
11 names, they are providing information about his mother?

12 A. Yes.

13 Q. His father?

14 A. Yes.

15 Q. Brothers and sisters?

16 A. Yes.

17 Q. Including a fourth-grader?

18 A. Yes.

19 Q. Let me direct your attention to 4-26.

20 Is that an internal document of Baghdad IIS?

21 A. Yes. It's a memorandum written by the case officer,
22 Qays Kamil Ali, directed to the desk chief regarding the
23 collaborator William George Potros.

24 Q. And is there a discussion there about Mr. Sami Khoshaba?

25 A. Yes. In the middle of the letter there is a reference

1 to William George who fled outside the country, and his
2 travel was done in a legitimate fashion, and the discussion
3 was held with Mr. Sami Khoshaba regarding him. And Sami
4 Khoshaba is a member of our station in Athens who clarified
5 that -- that he left -- he migrated to America.

6 Q. If you remember back a few minutes ago, we had the
7 letter from William dated in September of 1983?

8 A. Yes.

9 Q. And this is three months later?

10 A. Yes. This memorandum was written on December the 5th,
11 '83.

12 Q. I would like to direct your attention to 2-4.

13 We are now going to move into 1984.

14 A. Yes.

15 Q. And that's a letter from Baghdad to Washington IIS?

16 A. Yes.

17 Q. And it concerns George Potros. It's dated April 2nd of
18 1984?

19 A. Yes.

20 Q. Please read bullet point No. 6.

21 A. The point No. 6 states that he used to have a
22 relationship with Comrade Sami Khoshaba, the Athens Public
23 Affairs Office member, under the cover of the party, and he
24 received monetary assistance at the time.

25 Q. And below bullet point No. 6, is there a direction to

1 Washington from Baghdad?

2 A. Yes. There are instructions, and the first paragraph is
3 to secure contact with the aforementioned person by a member
4 of the interests section who's not a member of the Public
5 Affairs Office, and to instruct him to maintain a direct
6 communication with you and to desist from contacting Comrade
7 Sami Khoshaba.

8 Q. I would like to direct your attention to 2-3.

9 A. Yes. This is a letter from Washington station to the
10 Mukhabbarat in Iraq, which is a response to the letter, and
11 this letter is handwritten by me, and it's signed by the
12 station chief, Mowafiq Al -Ani. And it's dated August 9, '84.

13 Q. You are basically telling him you provided a point of
14 contact for Mr. Potros?

15 A. Yes.

16 Q. Is that document original or a photocopy?

17 A. A copy.

18 Q. Let me direct your attention to 4-22.

19 A. Yes. This also is a letter from Washington station to
20 the Mukhabbarat in Baghdad on October 5, '84, regarding
21 William George Potros. And the letter was handwritten by me,
22 and it was signed by the station chief, Mowafiq Al -Ani.

23 Q. And basically, you are advising Baghdad that nothing is
24 going on with Mr. Potros at this time through Washington?

25 A. Correct.

1 Q. Let me direct your attention to 4-10.

2 A. Yes.

3 Q. That's an internal document at Baghdad headquarters?

4 A. Yes.

5 Q. And is it written by -- this is on PDF 4-11, but we
6 don't need to go there -- Naser Thamer?

7 A. Yes.

8 Q. April 27th, 1985?

9 A. Yes.

10 Q. It relates to Mr. Potros?

11 A. Yes.

12 Q. And could you read bullet point No. 6.

13 A. When the said person was in Athens in 1982, he was
14 contacted by Comrade Sami Khoshaba, and he started to
15 cooperate with him. And after that date, the said person
16 traveled to America. And we notified the Washington station
17 to secure a contact with him by an embassy member who is not
18 a member of the Public Affairs Office.

19 Q. Could you read bullet point No. 9.

20 A. This case -- the case of this source is one of several
21 cases. The Washington station suffers from those who used to
22 cooperate with Comrade Sami Khoshaba, because most of those
23 members, once they arrived at the United States of America,
24 they will provide Comrade Sami with a temporary address. But
25 they quickly change it after they obtain a certain type of

1 employment, and they do not notify Comrade Sami of the new
2 address.

3 And also, most of those, once they obtain some sort
4 of employment, they lose interest in dealing with the embassy
5 and its members, because they no longer need it.

6 We suggest that Comrade Sami Khoshaba be talked to
7 about that, to provide us with the address of the said person
8 and his telephone number and the most recent information
9 about him.

10 Q. I would like to go back a few days, to April 16th, 1985,
11 on PDF 1-36.

12 A. Yes.

13 Q. That's another letter from Washington to Baghdad about
14 Mr. Potros and the fact that nothing is really happening with
15 him.

16 A. Is it 1-26?

17 Q. 36.

18 A. Yes.

19 Q. And whose handwriting is that?

20 A. My handwriting.

21 Q. And for whose signature?

22 A. It's the signature of the station chief, Mowafiq Al -Ani .

23 Q. I would like to direct you to 1-34.

24 A. Yes.

25 Q. If you go back two letters, Baghdad is now making

1 inquiries for Mr. Khoshaba as to information as to the
2 address of Mr. Potros?

3 A. Yes.

4 Q. What is this letter?

5 A. This is a letter from Athens station dated May 17th,
6 '85, and the subject matter is William George Potros. And
7 the letter includes his address in English.

8 Q. And that address refers to San Diego, California?

9 A. Yes.

10 Q. And does it also describe him as affiliated with the
11 Hammurabi newspaper?

12 A. Yes. He is the secretary of the chief editor of
13 Hammurabi newspaper.

14 Q. Does it say who publishes the Hammurabi?

15 A. They say that the financing party is the intelligence
16 station in Athens.

17 Q. Let me direct your attention to 1-26.

18 A. Yes.

19 Q. That's a letter from Baghdad to Washington dated
20 February 10th of 1986?

21 A. Yes.

22 Q. And could you read us the subject and also the first
23 paragraph.

24 A. The subject matter is to secure contact.

25 We request that you secure a contact with the

1 below-mentioned collaborators with the code word, "Sami says
2 hello," and under the cover of the Arab socialist Baath
3 party, knowing that they had a connection with Comrade Sami
4 Khoshaba, our office's member in Athens, and to notify us
5 once the contact was made with them and to study the
6 abilities and their needs so that we could notify you about
7 the financial assistance to be allocated -- provided to them.

8 Q. And there is one name with a Chicago address on that
9 particular page; is that correct?

10 A. Yes, and that's Mikhail Dawood with his address in
11 English.

12 Q. And this is a three-page letter. Let's go to the second
13 page, which is 1-27.

14 A. Yes.

15 Q. Five more individuals are listed as collaborators?

16 A. Yes.

17 Q. William George in California?

18 A. Yes.

19 Q. Sargon Adam on Rosemont Avenue in Chicago?

20 A. Yes.

21 Q. Zuhair Shaony in California?

22 A. Yes.

23 Q. And two others with just phone numbers?

24 A. Yes.

25 Q. Turning to the last page, which is 1-28.

1 A. Yes.

2 Q. One more individual in Michigan?

3 A. Yes, Jamal Kareem Odi sho.

4 Q. I would like to direct your attention to 1-14. That's a
5 five-page letter?

6 A. Yes.

7 Q. And it's from Washington to Baghdad?

8 A. Yes.

9 Q. And do you recognize the handwriting on that document?

10 A. Yes. It's in the handwriting of the station member
11 Younis Ihlail Alawi.

12 Q. How long did you work with Mr. Younis Alawi?

13 A. We both arrived to America on the same day, and we left
14 America and returned on the same day. We worked together for
15 about three years and two months.

16 Q. And what was his position in Iraqi Intelligence Service?

17 A. He was an intelligence officer, and he was like an
18 assistant to me as station chief.

19 Q. Would he, among his responsibilities, have
20 communications with collaborators?

21 A. Yes. And he had so many collaborators, including some
22 in Chicago.

23 Q. Was there any particular reason why he had so many in
24 Chicago, or did you just divide it up geographically?

25 A. There was no particular reason. The truth is that when

1 we came, it was only he and I. Then we were joined by more
2 officers.

3 Q. So he did a lot of the field work?

4 A. Yes.

5 Q. When he was back in Washington, was he assigned at the
6 embassy itself?

7 A. Yes. He was a third secretary at the embassy.

8 Q. And so he had diplomatic cover?

9 A. Yes.

10 Q. He was considered a ministerial employee of the embassy?

11 A. Yes.

12 Q. And if I wanted to contact him, I could reach him at the
13 embassy, if I wanted to?

14 A. Yes.

15 Q. Let me direct your attention to 1-15.

16 A. Yes.

17 Q. And is there a reference bullet point No. 3 to Hilal
18 Issa?

19 A. Yes, and that would be point No. 3.

20 Q. And No. 5 is Mr. Potros?

21 A. Yes.

22 Q. And again, this is your summary of collaborators and
23 your contacts with them that you are advising Baghdad?

24 A. Yes.

25 Q. And directing your attention to PDF 1-16, which is

1 Page 3 of that letter.

2 A. Yes.

3 Q. Mr. Di nkha?

4 A. Yes.

5 Q. Mr. Shaony?

6 A. Yes.

7 Q. Zumaya?

8 A. Yes.

9 Q. And Mary Oraha?

10 A. Yes.

11 Q. They are all listed as collaborators?

12 A. Yes.

13 Q. And Mary Oraha is also identified as an individual in
14 Chicago?

15 A. Yes.

16 Q. I would like to direct your attention to PDF 1-17.

17 A. Yes.

18 Q. It continues on about Mary Oraha in that it doesn't look
19 like she has much value?

20 A. Yes.

21 Q. Also listed are Mr. Jeto and Mr. Dawood?

22 A. Yes.

23 Q. Turning to the last page, which is PDF 1-18.

24 A. Yes.

25 Q. One more collaborator, Michael Dawood?

1 A. Yes.

2 Q. And is there a signature on that page?

3 A. Yes. It's my signature in my capacity as a station
4 chief.

5 Q. I think we are done with that file.

6 Let me give you Shaony Group 1.

7 (Document tendered.)

8 BY MR. CONWAY:

9 Q. What is that?

10 A. This is one of the Iraqi Intelligence files containing
11 information about the agent Zuhair Shaony, Hammurabi magazine
12 in San Diego.

13 Q. And we are not going to go through this, but there is an
14 index in there, in that file, 4-18?

15 A. Yes.

16 Q. I would like to direct your attention to 4-16.

17 A. At the index?

18 Q. 4-16.

19 A. Yes.

20 Q. And is that a letter from Athens dated November 7th,
21 1984, back to Baghdad?

22 A. Yes.

23 Q. And the subject matter?

24 A. The subject is "newspaper publishing."

25 Q. Could you read the letter, please.

1 A. In accordance with the instructions and directives of
2 the honorable director general and after the last visit made
3 by Comrade Sami Khoshaba to the United States of America, and
4 that he accomplished several meetings with some collaborators
5 in America who possess some media ability. And arrangements
6 were made with them to publish a newspaper reflecting the
7 image of Iraq so that the community members could view it.

8 And all the requirements for the newspaper
9 publishing have been discussed with Mr. Zuhair Shaony and
10 William Potros, and we have been completely convinced that
11 such a newspaper would get approval from the public.

12 And the two collaborators issued the first -- the
13 two collaborators published the first issue of it and under
14 the name Hammurabi, which is enclosed and will continue to
15 get published for the better.

16 Enclosures: Newspaper.

17 Q. I would like to direct your attention to 3-20 at this
18 point.

19 A. 320?

20 Q. 3-20.

21 A. Yes.

22 Q. Is that an internal document at Baghdad headquarters
23 from case officer Naser Thamer?

24 A. Yes.

25 Q. Dated 2-23-1985?

1 A. Yes.

2 Q. And it is about the Hammurabi magazine?

3 A. Yes.

4 Q. And could you read bullet point 1.

5 A. Hammurabi magazine is issued by a number of
6 collaborators with us among the Assyrians in California, in
7 coordination with Comrade Sami Khoshaba, our Athens station
8 member.

9 Q. And could you read bullet point No. 3, please.

10 THE INTERPRETER: Point No. 2 or No. 3, Mr. Conway?

11 MR. CONWAY: No. 3.

12 BY THE WITNESS:

13 A. Enclosed is the third issue of the magazine, which got
14 published, including several political and social subjects,
15 including condemning the Persian regime for killing a number
16 of Iraqi prisoners of war, pleading with the international
17 public opinion to rescue political prisoners in Iran, a
18 variety of art and social subjects.

19 BY MR. CONWAY:

20 Q. What's the next sentence right after that bullet point?

21 A. Please review, and we are awaiting the response -- a
22 response from Athens station to endorse the magazine -- to
23 support the magazine.

24 Q. Let's move up one month to March 23rd, 1985, No. 3-18.

25 A. Yes. This is a letter from Athens station dated

1 February 22nd, '85 -- March 22nd, '85. And the subject is
2 the press mission in Washington.

3 The source is Zuhair Shaony, the chief editor of
4 Hammurabi newspaper.

5 Q. Could you read the next paragraph, please.

6 A. Through the telephone communication between Comrade Sami
7 Khoshaba and the Hammurabi chief editor in America, he
8 mentioned to our office member that the press attaché in
9 America does not cooperate at all with the newspaper, and it
10 sends information to entities which does a disservice to our
11 country.

12 Q. Could you just read the very last paragraph.

13 A. Please review, and we suggest that the press attaché in
14 America be directed to cooperate with the newspaper and
15 facilitate its publishing mission and to provide it with Iraq
16 news.

17 Q. Let's move up one more month, 3-11.

18 A. Yes.

19 Q. That's a letter from IIS Washington back to IIS Baghdad
20 dated April 3rd, 1985?

21 A. Yes, '85.

22 Q. Do you recognize the handwriting on the Arabic?

23 A. Yes.

24 Q. Whose is it?

25 A. This is the handwriting of one of my officers at the

1 office, Nadhim Mutar Haddad.

2 Q. For whose signature?

3 A. Mowafiq Al -Ani , the station chief.

4 Q. Does it suggest supporting the newspaper by paying \$300
5 a month?

6 A. Yes.

7 Q. I would like to direct your attention to 3-12.

8 A. Yes. This is the minutes of a meeting directed to the
9 director general of Secret Service -- general Secret Service.

10 Q. This is an internal document back at Baghdad, correct?

11 A. Yes.

12 Q. And it describes a meeting of individuals in Baghdad
13 discussing certain things, correct?

14 A. Yes.

15 Q. Could you read the first paragraph, please.

16 A. A meeting of the Assyrian section was held on
17 April 13th, '85. And it was attended by the comrades
18 Muhammad Talib and Sami Khoshaba from the Athens station.

19 There was a discussion about the situation and the
20 management of collaborators and trustees in America,
21 Australia, and Canada, who currently are connected to the
22 Athens station.

23 Q. If you look down at bullet point No. 1, that talks about
24 the Assyrian/Chaldean collaborators who give information
25 through Canada and Australia?

1 A. Yes.

2 Q. What is decided about them?

3 A. The Canada and Australia station shall receive all the
4 collaborators and the trustees among the Assyrians and the
5 Chaldeans who are in that area and will run them directly.

6 So the Athens station will send their addresses,
7 their files, along with information about them to secure a
8 contact with them with a code word and through the
9 headquarters.

10 Q. So the collaborators in Canada and Australia are being
11 pushed out from Athens, correct?

12 A. Yes.

13 Q. This is late 1985?

14 A. Yes.

15 Q. And bullet point No. 2, does that discuss who's going to
16 direct the sources in America?

17 A. Yes.

18 Q. And are there actually two options available?

19 A. Yes.

20 Q. What is that?

21 A. The first option is that the important ones among them
22 would be connected to Athens station, and managing them and
23 maintaining a relationship with them would be handled by it.

24 The second option is that the connection of the
25 collaborators and the trustees, which Athens station suggest

1 to turn them over to Washington station and maintaining the
2 relationship with them would be direct.

3 Q. I would like to direct your attention to 3-13, which is
4 the second page of that letter.

5 A. Yes.

6 Q. Is there an amount authorized by Baghdad to be paid
7 through Athens to cover the activity of -- watching the
8 activity of the Assyrians in the United States?

9 A. Yes. To authorize the Athens station to get the amount
10 of \$8,000 a month, which would be spent in accordance with
11 standards to cover the Assyrians' activity in America. And
12 that amount should include the collaborators' and trustees'
13 salaries and the support to the Hammurabi newspaper.

14 Q. And I would like to direct your attention to 3-7.

15 A. Yes.

16 Q. Is this a letter from Baghdad IIS to Athens IIS dated
17 May 2nd, 1985, in which they tell them it's okay to pay
18 \$8,000 a month?

19 A. Yes.

20 Q. So the money is turned on, if you will, in May of 1985,
21 is authorized?

22 A. Yes.

23 Q. Let me direct your attention to 2-48.

24 A. Yes.

25 Q. And that's an internal Baghdad IIS document, correct?

1 A. Yes.

2 Q. Authored by Naser Thamer?

3 A. Yes.

4 Q. And it's two months later, July 11th, 1985?

5 A. Yes.

6 Q. Who is it addressed to?

7 A. It's directed to the head of Section 5.

8 Q. And what does Naser tell the head of Section 5?

9 A. Subject is Hammurabi newspaper. We received from Athens
10 station a new issue of Hammurabi newspaper, which is the
11 May '85 issue. And this newspaper is published by a number
12 of collaborators in America, among whom is Zuhair Shaony, and
13 in accordance with the directive of his excellency, the
14 director general, and in coordination with Mr. Sami Khoshaba,
15 Athens station member.

16 And in that issue there were a number of good
17 articles about our war against the Persian enemy and good
18 coverage of the Assyrian society's news, which strengthens
19 and reinforces its continuity.

20 Q. Thank you.

21 If we can turn to 2-27.

22 A. Yes.

23 Q. That's a letter from Athens IIS back to headquarters?

24 A. Yes.

25 Q. The subject matter is Assyrian activity outside Greece

1 and it's dated January 10th, 1986?

2 A. Yes.

3 Q. It purports to give the names of collaborators in
4 America, Australia, Canada, and New Zealand?

5 A. Yes.

6 Q. That's just Page 1 of 4?

7 A. Yes.

8 Q. On the page you have in front of you, under bullet
9 point 1(d), it has "William George"?

10 A. Yes.

11 Q. Below his name, "Zuhair Shaony"?

12 A. Yes.

13 Q. I would like to turn your attention to 2-28.

14 A. Yes.

15 Q. There is additional names?

16 A. Yes.

17 Q. And are there dollar amounts listed below the names?

18 A. Yes.

19 Q. And is that an accounting of the \$8,000 a month that is
20 supposed to be paid to cover Assyrian activity?

21 A. Yes.

22 Q. And the very first one is \$3,000 for the publishing of
23 the Hammurabi newspaper?

24 A. Yes, and that's Zuhair Shaony.

25 Q. Directing your attention to 2-23.

1 A. Yes.

2 Q. That's an internal document at Baghdad IIS headquarters
3 concerning the spending on the newspaper?

4 A. Yes.

5 Q. Could you just read the first sentence of bullet
6 point 1.

7 A. The first point states the following: The Athens
8 station provided us with an account statement containing the
9 paid salaries to a number of collaborators who were run by
10 Mr. Sami Khoshaba.

11 Q. I would like to direct you to the second part of that,
12 which is on 2-24.

13 A. You mean the second paragraph?

14 Q. Well, I want bullet point No. 3.

15 A. Yes. Point 3 says the mentioned spending on Hammurabi
16 newspaper was a result of a personal decision of Mr. Sami
17 Khoshaba, since he was given the amount of \$8,000 a month,
18 and he had freedom in locating salaries and assistance to his
19 friends among the Assyrians without getting instructions from
20 the headquarters.

21 Q. I would like to direct your attention to 2-10.

22 A. Yes.

23 Q. Is that a letter from Washington IIS to Baghdad IIS
24 dated December 31st, 1986?

25 A. Yes.

1 Q. And whose handwriting is on that letter?

2 A. The station member, Younis Ihlail Alawi.

3 Q. And for whose signature?

4 A. My signature, the station chief.

5 Q. And the subject matter is Zuhair Shaony?

6 A. Yes.

7 Q. Could you read bullet point No. 1.

8 A. He used to have a previous relationship with Mr. Sami
9 Khoshaba in Athens, and for the last few months he hasn't
10 been contacted by him.

11 Q. If you look at bullet point No. 5, which is on 2-11.

12 A. Point No. 5 contains his address in English, in San
13 Diego, California.

14 Q. And again, you signed that?

15 A. Yes.

16 Q. Directing your attention to 1-37.

17 A. Yes.

18 Q. Is that a letter dated April 21st, 1987, from Washington
19 IIS to Baghdad IIS?

20 A. Yes.

21 Q. And whose handwriting on that letter?

22 A. Yes. It's Younis Ihlail Alawi's handwriting.

23 Q. And for whose signature?

24 A. My signature.

25 Q. And in that communication, are you providing information

1 about Mr. Shaony?

2 A. Yes.

3 Q. And you are trying to figure out whether or not you
4 should continue supporting Mr. Shaony in publishing the
5 newspaper and paying him; is that correct?

6 A. Yes.

7 Q. Let me show you what's been marked as Government Exhibit
8 Al bazi Group 1.

9 (Document tendered.)

10 BY MR. CONWAY:

11 Q. What is that?

12 A. This is one of the Iraqi Mukhabbarat's files, the
13 Amanoel Al bazi's file, Sami Khoshaba's friend, America.

14 Q. Directing your attention to PDF 20.

15 A. Yes.

16 Q. Is that a letter from Athens IIS to Baghdad IIS dated
17 November 4th of 1980?

18 A. Yes.

19 Q. And the subject is addresses of individuals in United
20 States?

21 A. Yes.

22 Q. Could you read the first paragraph, please.

23 A. Enclosed is the report of the member of public
24 relations -- Public Affairs Office regarding the addresses of
25 three good Assyrians in America. We suggest to send to our

1 office in Washington to act upon them under the cover of the
2 party. And the action would be taken on the ground of the
3 former friendship they had with Comrade Sami Khoshaba.

4 Q. So that's a cover letter to provide further information
5 back to Baghdad?

6 A. Yes.

7 Q. Let me direct you to Page 21.

8 A. Yes.

9 Q. It lists three individuals for whom information is
10 provided in English; is that correct?

11 A. Yes. Their names are written in Arabic and their
12 addresses are in English.

13 Q. And one lives on Spalding Avenue in Chicago?

14 A. Yes.

15 Q. One on Oakley in Chicago?

16 A. Yes.

17 Q. And the third one is for Amanoel Al bazi , correct?

18 A. Yes.

19 Q. At 5339 Paulina?

20 A. Yes.

21 Q. And is there a place for a signature?

22 A. Yes. There is a signature and a date but no name. But
23 it is clear that this is a report of -- report from the
24 station member.

25 Q. You just don't recognize the signature, do you?

1 A. Correct. I cannot recognize the signature.

2 Q. Directing your attention to Page 18.

3 A. Yes.

4 Q. Is that a similar type of letter?

5 A. Are you asking about Page 18?

6 Q. Page 18.

7 A. This is a letter from the Mukhabbarat in Baghdad to the
8 Washington station.

9 Q. To pass on the information that Athens passed on to
10 Baghdad?

11 A. Exactly so.

12 Q. And the same three individuals are identified by name
13 and address?

14 A. Yes.

15 Q. Could you read the body of that letter before the names.

16 A. We request that you approach the Assyrian members whose
17 names and addresses are below. It should be noted that they
18 had a friendship relation with Comrade Sami Khoshaba, the
19 public affairs office member in Athens. Therefore,
20 approaching them should be done under the partisan work cover
21 and their prior relationship with Comrade Sami Khoshaba.

22 Q. Let me direct you to Page 15.

23 A. Yes.

24 Q. That's a letter from Washington IIS back to Baghdad IIS?

25 A. Yes.

1 Q. And whose handwriting, whose signature?

2 A. This is the handwriting of one of my officers at the
3 station. He is Mustafa Hassan Ali. And the signature is
4 mine.

5 Q. And you are providing information back as far as the
6 tracking of these three individuals in Chicago?

7 A. Yes.

8 Q. And the reason we know that, because you refer back to
9 their letter by their number, as you always do?

10 A. Yes.

11 Q. Let me direct your attention to Page 14.

12 A. Yes.

13 Q. And what is this?

14 A. This is a letter from the Iraqi Intelligence in Baghdad
15 to the Washington station. The subject matter is Amanoel
16 Al bazi .

17 Q. Again asking you to see if he could be helpful?

18 A. Yes.

19 Q. Do they describe what his contact had been with the IIS?

20 A. Yes. It says the referenced person had a friendship
21 relation with Comrade Sami Khoshaba, the Athens public
22 relations office member.

23 Q. Directing your attention to Page 13.

24 A. Yes.

25 Q. That's a letter dated March 24th, 1996, from Washington

1 IIS to Baghdad IIS?

2 A. Yes.

3 Q. It's some information about Mr. Al bazi ?

4 A. Yes.

5 Q. Whose handwri ting and whose signature?

6 A. It's the handwri ting of the station member, Youni s

7 Ihl ai l Al awi , and my signature.

8 Q. I would like to di rect you to Page 11.

9 A. Yes.

10 Q. And this is a letter from Washi ngton?

11 A. This is part of a letter, yes.

12 Q. To Baghdad?

13 A. Yes.

14 Q. Whose handwri ting?

15 A. The station member, Youni s Ihl ai l Al awi .

16 Q. And whose signature?

17 A. My signature.

18 Q. And right above your signature, what is the very last
19 thing wri tten for you to sign off on?

20 A. We request that you review this, hoping that you would
21 inquire wi th Comrade Sami Khoshaba in order to get hi s
22 detailed information about Amanoel Al bazi .

23 Q. I would like to di rect your attention to Page 10.

24 A. Yes.

25 Q. And that's Washi ngton IIS to Baghdad IIS June 4th, 1986?

1 A. Yes.

2 Q. It provides information gathered on Mr. Al bazi ?

3 A. Yes.

4 Q. It talks about affiliations with various Assyrian
5 groups?

6 A. Yes.

7 Q. It says he plays in a band?

8 A. Yes.

9 Q. And his sister works for Iraqi airways?

10 A. Yes.

11 Q. Whose handwriting is this letter?

12 A. The same person, Younis Ihlail Alawi .

13 Q. And who signed it?

14 A. My signature.

15 Q. I would like to direct your attention to Page 7.

16 A. Yes.

17 Q. This is a letter from Athens IIS to Baghdad IIS dated
18 August 1st, 1986?

19 A. Yes.

20 Q. And what is Athens telling Baghdad about Sami Khoshaba?

21 A. We wish to inform you that Comrade Sami Khoshaba has
22 been transferred to a country, and he is there currently.

23 Q. I would like to direct your attention to Page 6.

24 A. Yes.

25 Q. That's an internal IIS document, Baghdad?

1 A. Yes.

2 Q. Again provides information about Mr. Al bazi ?

3 A. Yes. It's a memorandum directed to the Assyrian section
4 chief containing information about Amanoel Al bazi .

5 Q. Would you read the first sentence, please.

6 A. The aforementioned person has a strong friendship
7 relation with me and this relation has been going deep. At
8 the time, the aforementioned person was in Greece. And he
9 had good positions about the country and is one of the
10 citizens who always love Iraq.

11 Q. And it provides information about him. Again, it even
12 names the band he is in, right? Number 1?

13 A. Yes.

14 Q. And who signed this document?

15 A. This is an internal memorandum written by Sami Khoshaba
16 Latchin, dated August 12, '86. And he is the one who signed
17 it.

18 Q. Now, can you slow down and tell us about the signature?
19 Is this a scribble? Is his name under it? How do you know
20 that's Sami Khoshaba Latchin?

21 A. First of all, this is an original memorandum. It is not
22 a photocopy.

23 And he is the one who authored it and signed it.
24 It could not be written by someone and signed by someone
25 else. And he wrote his name and signed. And I could tell

1 the signature because his first name and the first letter of
2 his first name is what appears here.

3 Q. The "S" and the "A"?

4 A. Yes, the letter "S."

5 Q. Let me direct your attention to Page 3.

6 THE INTERPRETER: Your Honor, I am really tired.

7 THE COURT: Time for a break. We will take a
8 recess.

9 (Jury out at 3:02 p.m.)

10 THE COURT: Do you have an idea how much longer you
11 are going to be with this witness?

12 MR. CONWAY: I have got to go through the files for
13 ten more minutes and maybe another half-hour after that. I
14 would say by 4:00 I should be done.

15 THE COURT: With direct.

16 MR. CONWAY: I hope.

17 THE COURT: Well, then depending on how you feel at
18 4 o'clock, we will decide whether we can go on today. I know
19 you're cross-examining this witness.

20 MS. JUDGE: I am.

21 THE COURT: You are, Ms. Judge. That's fine.

22 (A brief recess was taken at 3:03 p.m.)

23 THE COURT: Are we ready? Are you okay?

24 THE INTERPRETER: Yes, your Honor.

25 (Jury in at 3:27 p.m.)

1 THE COURT: Okay. You may be seated.

2 We are going to press on with Mr. Al -Dani ' s di rect
3 testi mony.

4 You may be seated, si r.

5 You may press on, Mr. Conway.

6 BY MR. CONWAY:

7 Q. Mr. Al -Dani , do you still have the Al bazi file in front
8 of you?

9 A. Yes.

10 Q. Page 3, pl ease.

11 A. Yes.

12 Q. What is that?

13 A. This is a letter from Washi ngton stati on dated
14 September 24, ' 86, about Amanoel Al bazi .

15 Q. Whose handwri ting and whose signature?

16 A. It' s handwri ting of Youni s I hl ai l Al awi , the offi ce
17 member. And the signature is mi ne.

18 Q. And what are you telling them?

19 A. It' s our response to their letter in order to strengthen
20 the relati on with the aforementioned person, meani ng Amanoel
21 Al bazi , and to deepen the trust in him. What do you thi nk
22 regardi ng obtai ni ng a letter to him from Comrade Sami
23 Khoshaba to deli ver it to him and so that it may have an
24 effect on deali ng with him in the future?

25 Q. Is that your signature right below that?

1 A. Yes.

2 Q. And is there a comment below your signature?

3 A. Yes. There are some signatures, internal ones from the
4 Iraqi Intelligence in Baghdad.

5 The first comment says to coordinate with Comrade
6 Sami Khoshaba. Then to the honorable chief of Section 4.
7 Coordination was made with Comrade Sami to prepare a letter
8 for the aforementioned person.

9 The other comment is after discussion with the
10 Comrade Sami Khoshaba, he mentioned that he works at night
11 and cannot be useful to be kept at the archives after
12 discussion with the head of Section 4.

13 Q. So he is being written off as a collaborator?

14 A. Yes.

15 Q. It's a bad place, too late at night?

16 A. Yes.

17 Q. Let me show you Nadj i Group 1.

18 (Document tendered.)

19 BY MR. CONWAY:

20 Q. And could you tell us what's written on the cover there?

21 A. Agent Nadj i Khoshaba, Sami Khoshaba's brother, Chicago.

22 MR. CONWAY: If I could ask the translator to lift
23 the microphone a little more toward you.

24 BY MR. CONWAY:

25 Q. Directing your attention to Page 15.

1 A. Yes.

2 Q. Let me ask you, did you know that Sami Khoshaba had a
3 brother?

4 A. Yes. I knew that he had a brother and relatives, but I
5 didn't know them personally.

6 Q. Did you even know their names?

7 A. Yes. I know Nadj i Khoshaba and hi s cousi n Hel en, and
8 hi s si ster, whose name I don' t remember.

9 Q. I would like to direct you to Page 15.

10 A. Yes.

11 Q. What is that?

12 A. This is an internal noti fi cation di rected from M4 to the
13 department securi ty di rectorate, whi ch i s M6. Attached i s a
14 copy of the Washi ngton stati on l etter and they request
15 i nformation about the Iraqi national Nadj i Khoshaba.

16 Q. I would like to direct you, then, to Page 19.

17 Is that the l etter from Washi ngton you j ust
18 referred to, dated January 3rd, 1985?

19 A. Yes.

20 Q. Do you recogni ze the handwri ti ng?

21 A. Yes.

22 Q. Is that one of the case offi cers i n Washi ngton?

23 A. He i s not exactl y a case offi cer, but he was one of the
24 offi cers who were empl oyed at the press attaché.

25 Q. And that was wri tten for Mowafi q Al -Ani ?

1 A. No. It's Mujbil Allawi.

2 Q. And who is he?

3 A. He is an intelligence officer who was working under
4 press cover.

5 Q. Under press cover?

6 A. Yes.

7 Q. In Washington?

8 A. Yes.

9 Q. What information is being provided about Mr. Nadji
10 Khoshaba?

11 A. American citizen of Iraqi origin; graduate of Technology
12 Institute, 1974, civil engineering department. He has been
13 in America for about seven years. He was employed at his
14 home country at a contracting -- at the private sector
15 contracting office, at the area of Baladrooz. He is
16 currently employed by an American company engaged in road and
17 bridge construction in Chicago, and his hourly rate is 17 and
18 a half dollars an hour. Married to an Iraqi national since
19 1981.

20 He is the brother of Mr. Sami Khoshaba, the Public
21 Affairs Office member in Washington.

22 He was met in Chicago through his cousin Helen,
23 whose passport was renewed.

24 His current address is written in English.

25 Q. That's 4609 North Monticello?

1 A. Yes.

2 Q. Directing your attention to Page 18.

3 A. Yes.

4 Q. That's internal correspondence at IIS headquarters in
5 Baghdad?

6 A. Yes.

7 Q. And who is it addressed to and who is it from?

8 A. Directed to the office chief and written by the case
9 officer Shaker Abdel Qader.

10 Q. And what is he informing the chief?

11 A. Please review the Washington station letter, on the
12 side, regarding making use of the aforementioned person, who
13 is the brother of Mr. Sami Khoshaba, our station member in
14 Athens.

15 We recommend that the relationship with the
16 aforementioned person be approved to utilize his services in
17 approaching Assyrians in Chicago after verifying the
18 information about him by the department security.

19 Q. I would like to direct your attention to PDF 14.

20 PDF 14 is a letter?

21 A. Yes. This is a photocopy of a letter.

22 Q. And if you look at the letter, if you flip it over, is
23 there something attached to the letter itself?

24 Is there an envelope for that letter?

25 A. (No response.)

1 Q. Let me show you what is in fact affixed by a needle and
2 identified as No. 12.

3 That's an envelope, right?

4 A. Yes. This envelope is addressed to the esteemed beloved
5 brother Nadj i Khoshaba. And on it is the address in English.

6 Q. And it's got a town called Edling Brook, but it also has
7 a zip code of 60439, right?

8 A. Yes.

9 Q. Now going to Page 14.

10 A. Yes.

11 Q. That's the letter, correct?

12 A. This is not a letter. This is a correspondence from
13 Sami Khoshaba to his brother Nadj i Khoshaba.

14 Q. Right. And it's addressed to Nadj i?

15 A. Yes.

16 Q. And how is it signed?

17 A. What's stated in the bottom of the page is, "Your
18 brother Sami Khoshaba," and it's signed above his name.

19 Q. So there is the scribble signature, as we refer to it?

20 A. Yes.

21 Q. And below the scribble signature, there is actual
22 writing?

23 A. Yes.

24 Q. And what does it say with the actual writing?

25 A. "Your brother Sami Khoshaba."

1 Q. We are going to get into the letter in a minute.

2 You have seen this before, correct?

3 A. Yes.

4 Q. And this is a letter written to urge Nadji to cooperate
5 with Washington?

6 A. Yes.

7 Q. If Mr. Latchin wrote this letter for his brother Nadji,
8 why is it in the internal files of Baghdad?

9 A. Because this letter was written for official purposes,
10 and to authenticate, to document -- and to document it. And
11 this is one of the -- one of the duties of the intelligence
12 service, is to open the letter and read it to see what Sami
13 wrote to his brother Nadji, because he might write something
14 different to him. That's why they made a copy of the letter
15 and put it in the file, to be sure.

16 And they sent the original letter to the station to
17 be sent to Nadji.

18 Q. Could you read the first paragraph for us.

19 A. I write this letter to you, and it is different from the
20 ordinary writing which usually -- in which usually people ask
21 about health and about these other things. I send you that
22 from the depth of my heart.

23 And if you inquire about us, I will tell you that
24 we live in our dear country in complete comfort, because a
25 citizen cannot be comfortable except in the arms of his own

1 people, relatives, and friends, and the reality to which he
2 has to adjust. And that is something missing in western
3 societies in which we lived in alienation. And I understand
4 your circumstances being far away from your family and
5 friends, but this should not stop you from visiting your
6 folks and relatives whenever you please.

7 My brother, Nadji, you know how our family raised
8 us, since we grew up loving our country and being loyal to it
9 and providing all our potentialities for our homeland, our
10 dear country. And this way of upbringing is the only thing
11 that distinguishes us from others in terms of competing to
12 provide the homeland of exceptional efforts, defending its
13 land and honor and dignity. And thank God that our father --
14 God rest his soul -- possessed all types of love and loyalty
15 to his homeland. And he always directed us to follow that
16 line, and we follow his footsteps, who spares no effort
17 nowadays to serve its land and pride and to serve our
18 homeland.

19 Serving our homeland does not necessarily require
20 us to be there, but we could do it from many locations, many
21 spots far away, to contribute to the defense of its honor and
22 dignity and to hold our eyes up high, especially by you.

23 THE INTERPRETER: The witness just expressed to the
24 interpreter that what's meant is "they are in America."

25 THE COURT: Is -- I am sorry.

1 THE INTERPRETER: Is the Iraqis in America.

2 THE COURT: Iraqi is an American?

3 THE INTERPRETER: Yes.

4 BY THE WITNESS:

5 A. In America where hostility toward our country is on the
6 increase by those who sold their conscience for money, who
7 grew up and studied at the best schools in Iraq, but now they
8 conduct hostile activities against their own people,
9 relatives and friends, which is an indicator to the weakness
10 of their patriotism and their lack of awareness. And this
11 line they are following will make them regret it some day,
12 because the wrong path and the path of perverts will never
13 benefit their followers and will bring about their demise.

14 My dear brother Abu Mark, I am writing this
15 introduction to you even that you know it without me
16 explaining it, because this is the way our dear father raised
17 us. May God rest his soul. It's a real authentic patriotic
18 upbringing, coming out of love to our homeland. And he
19 suffered in fighting against the British. He suffered from
20 the British fighting against him in the company, and the
21 British hated him because he is patriotic and he loved his
22 homeland. And they put obstacles in his way of progress in
23 the company.

24 This letter of mine contains the introduction --
25 the content of the introduction which I started in the

1 letter. And I ask you to cooperate with and assist the
2 comrades at the embassy with all your ability and
3 contributions constantly, without stop, because you are more
4 aware of what's going on than anyone else. And my hope in
5 you is very big in that regard.

6 So do not disappoint me, even if it cause you some
7 discomfort and some effort. And I believe that a man does
8 not get tired when it comes to helping his homeland and his
9 own people, especially that we are in a stage of war with
10 Iran that was imposed on our country, and efforts are needed.
11 We are all supposed to work on one path to serve Iraq.

12 My greetings to the family and all friends.

13 Your brother, Sami Khoshaba.

14 Q. Do you need any water?

15 A. That's fine.

16 THE COURT: There is some right here.

17 BY MR. CONWAY:

18 Q. Sir, in the middle of that letter, it had a reference to
19 Abu Mark. What does that mean to you?

20 A. In Iraq and most Arab countries, a person is named by
21 his eldest son or daughter for endearment or respect.

22 Q. Do you personally know whether or not Nadj Lachin has a
23 son named Mark?

24 A. No.

25 Q. I would like to direct your attention to Page 11.

1 A. Yes.

2 Q. That's a letter from IIS Baghdad to Washington IIS dated
3 November 10th, 1986?

4 A. Yes.

5 Q. So about three weeks after the letter you just read?

6 A. Yes.

7 Q. It references Nadji Khoshaba?

8 A. Yes.

9 Q. And what is Baghdad telling Washington?

10 A. Baghdad sent Sami Khoshaba's letter to Washington
11 station, and it mentions here that in his letter he is urging
12 his brother to cooperate with comrades at the embassy. And
13 it requested that the station deliver the letter to Nadji and
14 to meet with him and to try to make use of him for the sake
15 of Iraq.

16 Q. So now the letter has been forwarded to Washington to be
17 passed on?

18 A. Yes.

19 Q. Let me direct you to Page 13.

20 Who is that from and who is that to?

21 A. Yes. This is an internal letter within the Iraqi
22 Mukhabbarat from office 12 to M6.

23 Q. What is M6?

24 A. It's in charge of the security of the Mukhabbarat
25 employees.

1 Q. Are they also getting a copy of that letter?

2 A. M6 was the one who obtained the letter from Sami. At
3 this point M6 is sending a copy of Mr. Sami's letter to his
4 brother Nadjî who resides in America. And it was a copy of
5 the exact same letter that we saw in the file.

6 Q. Let me direct you to Page 16.

7 A. Yes.

8 Q. And that's a letter from Washington to Baghdad dated
9 January 15th, 1987?

10 A. Yes.

11 Q. And it refers to Nadjî Khoshaba?

12 A. Yes.

13 Q. And it suggests that he will be met in Chicago when
14 comrade 12 goes to Chicago?

15 A. Yes.

16 Q. And you remember who comrade No. 12 is?

17 A. Yes. It's station member Younis Ihlail Alawi.

18 Q. And whose handwriting is on that piece of paper?

19 A. It is the same individual, Younis Ihlail Alawi.

20 Q. And who signed it?

21 A. My signature.

22 Q. Let me direct your attention to Page 6.

23 A. Yes.

24 Q. Is that a letter from Washington IIS back to Baghdad IIS
25 dated March 23rd, 1987?

1 A. Yes.

2 Q. Referencing Nadj i Khoshaba?

3 A. Yes.

4 Q. And whose handwriting is on that document?

5 A. Younis Ihlai l Alawi .

6 Q. Who signed that one?

7 A. I did.

8 Q. And could you read it to us, please?

9 A. This letter is a response to a letter from the
10 headquarters, the Iraqi Intelligence in Baghdad, and it says
11 that, enclosed is the report obtained by comrade 12, which he
12 sent along with other reports containing information about
13 Akki kar Bynyami n, Shi li amon Youkhana Goreel , Khoshaba Bathyu
14 Bobo.

15 Q. So in your earlier letter you advised Baghdad that
16 Younis would go to Chicago to meet with Mr. Khoshaba's
17 brother Nadj i Khoshaba?

18 A. Yes.

19 Q. And now are enclosing a report received by Younis from
20 Nadj i Khoshaba along with information about three individual s
21 whose names you just said?

22 A. Yes.

23 Q. I direct your attention to Page 7.

24 A. Yes.

25 Q. Now, first of all, that's a letter with several pages.

1 It's on yellow paper, I believe?

2 A. Yes.

3 Q. It's original handwriting?

4 A. Yes.

5 Q. Could you just show the first page of that up to the
6 jury.

7 A. (Indicating.)

8 THE COURT: Once again, the witness is showing this
9 file to the jurors. He has got it opened.

10 You may proceed, Mr. Conway.

11 BY MR. CONWAY:

12 Q. The top of that has got a date of March 2nd, 1987?

13 A. Yes.

14 Q. I hate to ask you this, but could you read the whole
15 thing for us, please?

16 A. Not at all. No problem.

17 My dear brother Younis, one eternal Arab nation
18 with an eternal mission.

19 Please give me your opinion and what you thought
20 about working with those who are loyal and were co-opted and
21 to speak with brother Sami as soon as possible.

22 We have conducted a few activities in the service
23 of our homeland as we experience this separation. Feel the
24 pain that is tearing our heart apart at what is happening to
25 our great nation and feeling the greater and most intense

1 pain at what our exalted leader -- for what our exalted
2 leader has been suffering, the great father, and all of the
3 leaders, from the highest to the lowest, to the youngest
4 loyal Iraqi. And all we do is, like they say, only a drop in
5 a bucket.

6 The individuals who you gain their cooperation to
7 serve our homeland, they often start out very seriously, and
8 within a short period of time, they cool off and their
9 production decreases. Some of them even stop completely, and
10 this is not at all helping us.

11 And what I mean, brother Younis, that we connect
12 them to the organization with an official permanently
13 present, meetings and membership fees, and to prepare the
14 party books in order to increase their education.

15 I hope that we will meet to study this matter well
16 and because I have other additional comments, and thank you.

17 There are some individuals whom we have gained and
18 are ready to serve the homeland. Please contact me before
19 you contact them.

20 Your loyal brother -- your brother who's loyal to
21 the homeland soil, Nadj i.

22 Q. Directing your attention to Page 8.

23 That's another yellow piece of paper, original
24 handwriting.

25 A. 8?

1 Q. 8.

2 A. Yes.

3 Q. That's information about a Mr. Bynyamin, who lives in
4 Elk Grove Village in Illinois?

5 A. Yes.

6 Q. It provides information?

7 A. Yes.

8 Q. And is there a warning about how he should be contacted
9 at work?

10 A. Yes.

11 Q. Does it say they should be careful because there is
12 another person there who's a member of a group?

13 A. Exactly so.

14 Q. It's the Assyrian Universal Alliance?

15 A. Yes.

16 Q. Do you know what that is?

17 A. I don't know. I don't have detailed information about
18 it, but I know it is an Assyrian organization similar to the
19 Assyrian party, which held hostile position toward Iraq.

20 Q. I would like to direct your attention to Page 9.

21 Is that another handwritten piece of yellow paper?

22 A. Yes.

23 Q. And that provides information on a Mr. Goreel?

24 A. Yes.

25 Q. Who lives on Maplewood Avenue in Chicago?

1 A. Yes.

2 Q. And similarly, Page 10?

3 A. Yes.

4 Q. Information on another individual who lives at
5 6110 North Seelcy in Chicago?

6 A. Yes.

7 Q. At the bottom is there a warning that he talks a lot and
8 he cannot be entrusted with a secret?

9 A. Yes.

10 Q. I would like to direct your attention to Page 5.

11 A. Yes.

12 Q. Is that IIS Baghdad to IIS Washington on April 19th,
13 1987?

14 A. Yes.

15 Q. Is that basically them telling you that you should
16 assess the value of Nadji Khoshaba?

17 A. Yes.

18 Q. Directing your attention to July of 1987, Page 4.

19 Now, by this time are you gone from Washington?

20 A. Yes. I had left two weeks before. I left on the 1st of
21 July.

22 Q. Whose handwriting is on that letter?

23 A. This is handwriting of Younis Ihlail.

24 Q. And who signed it?

25 A. Mustafa Hassan Ali.

1 Q. Is he the person who took your spot?

2 A. Yes.

3 Q. And are they advising Baghdad that contact was made
4 through Younis?

5 A. Yes.

6 Q. That's contact with Nadji Khoshaba?

7 A. Yes.

8 And also the intelligence of Baghdad was notified
9 that we told Nadji that the contact would be with No. 35, and
10 that's Mustafa Hassan Ali, because Younis Ihlail, No. 12,
11 returned to his country.

12 Q. You both came and went together?

13 A. Yes.

14 Q. Let me show you Dawood Group 1.

15 (Document tendered.)

16 BY MR. CONWAY:

17 Q. What is that?

18 A. This is the agent Henry Jan Dawood in America.

19 Q. Directing your attention to Page 34.

20 A. Yes.

21 Q. That's a letter from IIS Athens to IIS Baghdad dated
22 March 9th, 1984?

23 A. Yes.

24 Q. And that's a cover letter for cassette tapes of
25 recordings of Assyrian radio that Henry Dawood has provided

1 to Athens?

2 A. Yes.

3 Q. Directing your attention to Page 32.

4 A. Yes.

5 Q. Again, we have seen letters like this.

6 This is a letter to Washington about certain
7 collaborators, correct?

8 A. Yes.

9 Q. Dated June 2nd, 1984?

10 A. Yes.

11 Q. And what is the first sentence of the body of that
12 letter?

13 A. Below are the names of the Assyrian collaborators who
14 have relation with Comrade Sami Khoshaba, the member of the
15 Public Affairs Office in Athens. It should be noted that the
16 cooperation of those started in Athens, and it continued
17 until after the departure for the United States of America,
18 as the telephonic contact with them is still going on. And
19 they provide us with information about the Assyrian
20 activities.

21 Q. Could you read bullet point No. 1.

22 A. To secure contact with those collaborators by a member
23 of the Interests Section who is not a member of the Public
24 Affairs Office, and to inform them to cut their relation with
25 Comrade Sami Khoshaba and to keep the relationship only with

1 you.

2 Q. I would like to direct you to Page 33, which is Page 2
3 of that letter.

4 A. Yes.

5 Q. And is one of the names Henry Dawood in Chicago?

6 A. Yes, it's the third name.

7 Q. I would like to direct you to Page 24.

8 A. Yes.

9 Q. That's Baghdad IIS to Washington IIS dated
10 September 19th, 1984.

11 I am sorry. Page 24.

12 A. Yes.

13 Q. Could you just read the first sentence, please.

14 A. We wish to inform you that the collaborator Henry John
15 Dawood presented information to Comrade Sami Khoshaba, the
16 Public Affairs Office member in Athens. The content of the
17 information is that the Assyrian regime is attempting to
18 create a military apparatus affiliated with it from the
19 Assyrian community present in Chicago.

20 As part of the devised plan, and the initial stages
21 of that plan started when a delegation arrived in Chicago --

22 Q. That's fine right there.

23 You are then asked to check out -- or Washington is
24 asked to check out the validity of that information?

25 A. Yes.

1 Q. Directing your attention to Page 16.

2 A. It's 16 and 17.

3 Q. That's original notebook paper ripped out of a notebook,
4 correct?

5 A. Yes.

6 Q. And it has the original ink on it?

7 A. Yes.

8 Q. And could you read that to us.

9 A. Brother Sami , greetings and respect.

10 Brother Sami , brother Dennis Odi sho has infiltrated
11 us with a group. Beit Nahrain give me this information,
12 that more than 200 Assyrian fighters are now in northern Iraq
13 and are fight in the name of Assyrians with help from some
14 Assyrians in Iraq.

15 Q. Thank you.

16 Page 22, please.

17 A. Yes.

18 Q. That's a letter, Baghdad IIS to Athens IIS dated
19 September 19th, 1984?

20 A. Yes.

21 Q. It's referencing Mr. Dawood?

22 A. Yes.

23 Q. And what is the recommendation from the home office?

24 A. Contact was secured with aforementioned person by our
25 station in Washington. Please review and urge him to

1 cooperate with our comrades in America in the case he
2 contacts Comrade Sami Khoshaba.

3 Q. Thank you.

4 Page 21.

5 A. Yes.

6 Q. That's Washington IIS to Baghdad IIS dated October 17th,
7 1984, referencing Mr. Dawood?

8 A. Yes.

9 Q. And is that an original or photocopy?

10 A. This is original.

11 Q. Whose handwriting?

12 A. That's my handwriting.

13 Q. And for whose signature?

14 A. The station chief, Mowafiq Al -Ani .

15 Q. And are you telling Baghdad you are just starting the
16 process of figuring out who Mr. Dawood is?

17 A. Yes.

18 Q. Directing your attention to Page 14.

19 A. Yes.

20 Q. And that's an internal document at IIS headquarters?

21 A. Yes.

22 Q. And it relates to Mr. Dawood?

23 A. Yes.

24 Q. And what are they discussing in bullet point 1?

25 A. The letter of the Athens station, 3165, on

1 December 10th, '83, contains a number of names of
2 collaborators. Among them is the above-mentioned person. To
3 secure contact in America after they had contact with Comrade
4 Sami Khoshaba at Athens station.

5 Q. And No. 3?

6 A. The said person sent a report to Comrade Sami Khoshaba
7 at the Athens station.

8 Q. That's fine.

9 What about No. 4?

10 A. He also provided Comrade Sami Khoshaba with information
11 regarding opening an office in Syria.

12 Q. That's fine.

13 Going down, is there an opinion section in that
14 letter?

15 A. Yes. There is an opinion and a suggestion.

16 Q. What is the opinion?

17 A. The above-mentioned person still has a relation with
18 Comrade Sami Khoshaba, and the proof is the attached
19 pamphlets and reports that are still sent to him at the
20 Athens station, and the fact that the Washington station
21 still could not establish contact with him.

22 Q. And what is the recommendation?

23 A. To write to the Athens station, Comrade Sami, to urge
24 him to contact the said person and to inform him that his
25 relation should be with Washington and with maintaining the

1 friendship with him, and to direct the Washington station to
2 give the subject of contacting the said person, and to
3 maintain a relation with him with some kind of showing
4 interest within a minimum two weeks.

5 Q. I would like -- and who signed that?

6 A. I don't know the signature, but it's the case officer,
7 Raed Abdel Azeez Ali. It's his signature because he is the
8 one who wrote the memo, because it's normal practice within
9 the Mukhabbarat when a case officer writes a memorandum to
10 sign it as well.

11 Q. Okay.

12 I would like you to look at PDF 1.

13 And that's part of a five-page letter that we have
14 seen before, correct?

15 A. Yes.

16 Q. And that's that long letter you wrote about different
17 collaborators?

18 THE INTERPRETER: When you say Page 1, do you mean
19 the jacket?

20 BY MR. CONWAY:

21 Q. Page 1 of 5.

22 A. Yes.

23 Q. Again, we have seen that in other files. These are the
24 summaries of the collaborators, and pieces of this particular
25 document would be put separate files or photocopied?

1 A. Yes.

2 Q. And if you look at the last page, who signed that
3 letter?

4 A. I did.

5 THE COURT: Are we getting there?

6 MR. CONWAY: Last one.

7 THE COURT: Good.

8 BY MR. CONWAY:

9 Q. Let me give you the file Dinkha Group 1.

10 (Document tendered.)

11 BY MR. CONWAY:

12 Q. What is that?

13 A. This is the agent Sargon Adam Dinkha's file, Chicago.

14 Q. Let me direct you to Page 2.

15 A. Yes.

16 Q. And who is that a letter from?

17 A. This is a letter from the Iraqi Intelligence in Baghdad
18 to the Washington station about securing contact with some
19 collaborators.

20 Q. If you could look at Page 18.

21 I am sorry. 2-18.

22 A. Yes.

23 Q. Who is that from?

24 A. This is a letter from the Iraqi Intelligence to the
25 general security directorate.

1 Q. Dated October 15th, 1984?

2 A. Yes.

3 Q. It provides information about Sargon Dinkha?

4 A. Yes.

5 Q. Birthday, education level?

6 A. Yes.

7 Q. Directing your attention to PDF 2-7.

8 A. Yes.

9 Q. Who is that from?

10 A. This is a letter from the Athens station to the
11 intelligence in Iraq.

12 Q. Date September 20th, 1985, referring to Sargon Dinkha,
13 collaborator in America?

14 A. Yes.

15 Q. It attaches a publication?

16 A. Yes.

17 Q. What's the signature on that page?

18 A. I am not sure 100 percent about it, but I believe that
19 it also belongs to Khaled Al-Sammarai'e, but I'm not sure.

20 Q. PDF 2-10.

21 Is that a letter from Baghdad to Washington IIS
22 dated July 25th, 1985?

23 A. Yes.

24 Q. And it refers to Mr. Dinkha.

25 Does it ask for information?

1 A. Yes.

2 Q. And whose friend is he described as?

3 A. It says here that he was a friend of Mr. Sami Khoshaba.

4 Q. And there is an address on Rosemont in Chicago for
5 Mr. Dinkha?

6 A. Yes.

7 Q. Directing your attention to 2-4, a letter from
8 Washington to Baghdad IIS.

9 A. Yes.

10 Q. Do you recognize the handwriting?

11 A. Yes. It's a station member, Younis Ihlail Alawi.

12 Q. For whose signature?

13 A. My signature.

14 Q. And just look at bullet point No. 8.

15 A. Yes. His relationship with Comrade Sami Khoshaba
16 started since May 1984. And during his meeting with Comrade
17 Sami in Chicago, knowing that he previously contacted
18 Mr. Izzat Amr for the purpose of cooperation.

19 Q. And No. 6, does that describe some background of Mr. --

20 A. Yes.

21 Q. What did he do?

22 A. During the period of his military service, he joined a
23 course at the Navy in Basrah for Navy SEALs. And on
24 January 14th, '74, he entered Beirut. And the following day
25 he conducted command operation inside the Israeli waters to

1 deliver weapons to the occupied lands.

2 Thereafter, he submitted a project to strike the
3 Israeli ships in ports, but it was not paid attention, and he
4 personally was ignored, which forced him to resign in 1975.
5 And that was rejected, and he was detained in Lebanon for a
6 month.

7 Q. I would like to look at bullet point No. 9.

8 A. Yes. He was employed at a small commercial shop along
9 with Mr. Sami Khoshaba's brother, the so-called Nadjj. Then
10 they sold the shop, and he left thereafter for California, as
11 a result of his bad financial situation. And we currently do
12 not have his address there.

13 Q. Thank you. I am done with that.

14 Let me show you what's been marked for
15 identification as IIS Voucher 1 through 5.

16 (Document(s) tendered.)

17 BY THE WITNESS:

18 A. Yes.

19 BY MR. CONWAY:

20 Q. What are those?

21 A. This is a document indicating that a certain amount of
22 money was paid, and that amount is \$30,000, and it contains
23 the name of the intelligence agency openly and the names of
24 the officers to whom the money was delivered. And it's
25 signed by several individuals, which means that the money was

1 spent completely by the sources.

2 Q. Let me just back up a bit.

3 As far as these five documents, if you look at
4 them, are they original documents?

5 A. They are all original.

6 Q. And you have seen those types of documents before at
7 IIS; is that correct?

8 A. A lot of that.

9 Q. Are those accounting records which are used to pay
10 people money?

11 A. Yes.

12 Q. Is it part of the IIS to keep such records?

13 A. Yes.

14 Q. And to keep those records in the ordinary course of
15 their business; is that correct?

16 A. Yes.

17 Q. Those records are prepared by individuals at or near the
18 time of the dates and events that appear upon them; is that
19 correct?

20 A. Yes.

21 MR. CONWAY: Your Honor, at this time I would offer
22 IIS Voucher 1 through 5.

23 MS. JUDGE: Objection.

24 THE COURT: That objection is overruled.

25 The document will be admitted.

1 (Said exhibits were received in evidence.)

2 BY MR. CONWAY:

3 Q. Starting with the first one, sir, this is an accounting
4 record.

5 Does this go to the accounting department, M12?

6 A. Yes.

7 Q. Again, could you explain, is this a voucher, if you
8 will, to obtain monies to pay two individuals?

9 A. Yes.

10 Q. It has the name Ismail Mahmud Ibrahim. Do you know him?

11 A. Yes. And he was a friend of mine.

12 Q. And he also worked for another individual who -- we
13 won't mention his name, but we will call him Mr. Khalil; is
14 that correct?

15 A. Yes. He worked as a secretary for many years.

16 Q. This is to provide Mr. Ibrahim with \$30,000.

17 Is this U.S. dollars or dinars?

18 A. 30,000 U.S. dollars.

19 Q. And directing you to Voucher No. 2 and 3, at the bottom
20 with the yellow sticker?

21 A. Yes.

22 Q. What are those two documents?

23 A. Number 2 is an internal notification from M4 to M12, the
24 accounting, in which they attach for them the receipt symbol
25 840 of the amount of \$6,000 for his salary from July 1st,

1 2000 to July 1st, 2001. And they request that the money
2 would be deducted from Mr. Comrade Ismail Mahmud.

3 Q. The original document Mr. Khalil signs in his true name.
4 We have replaced it with "Mr. Khalil" on this document; is
5 that correct?

6 A. Yes.

7 Q. Directing you to Voucher No. 3.

8 A. Yes.

9 Q. Is that the written receipt for the \$6,000 that was paid
10 to this individual?

11 A. Yes.

12 Q. Do you recognize any of those particular signatures?

13 A. I only know Ismail's signature.

14 Q. Ibrahim works for Mr. Khalil?

15 A. Yes.

16 Q. So that takes care of 6,000 of the 30. Let's talk about
17 the 24,000.

18 Let me refer you to IIS Voucher No. 4.

19 A. Yes. This is an internal notification from M4 to M12,
20 the accounting, and attached with the internal notification
21 is a receipt, a receipt for the amount of \$24,000 to symbol
22 Sarmad, delivered by Mr. Shakur Subhi. And they also request
23 the account be settled.

24 And also it says at the bottom that this was a loan
25 to Mr. Ismail Ibrahim for the salaries of symbol Sarmad for

1 the year 2,000.

2 Q. So this is an accounting receipt after the fact to
3 settle up the account, correct?

4 MS. JUDGE: Objection.

5 THE COURT: Objection to the form of this question
6 is sustained.

7 BY MR. CONWAY:

8 Q. Well, did Mr. Khalil sign this to approve the payment?

9 A. Yes.

10 Q. On what date?

11 A. October 8, 2001.

12 Q. And when were the monies actually paid out from
13 accounting?

14 A. From the accounting it was delivered -- do you mean when
15 it was given to the source?

16 Q. No. We will get to that.

17 Can you tell when Mr. Ibrahim received that cash?

18 MS. JUDGE: Objection.

19 THE COURT: Overruled.

20 You may answer.

21 BY THE WITNESS:

22 A. According to what's written here, that was on
23 October 9th, 2001.

24 BY MR. CONWAY:

25 Q. Let me direct you to underneath the marking of

1 "enclosure." Could you read that for us, please.

2 A. Yes. It's a receipt of delivery, the loan of Mr. Ismail
3 Mahmud Ibrahim in the amount of \$24,000 for the salary of
4 symbol Sarmad for the year 2000, Voucher No. 672, dated
5 August 5, 2001.

6 Q. I would like you to turn your attention to IIS Voucher
7 No. 5.

8 A. Yes. This is a receipt of payment of the amount of
9 24,000 received by symbol Sarmad. And it contains the names
10 of Shakur Subhi and Ismail Mahmud endorsing the receipt.

11 Q. Again, Shakur Subhi is who?

12 A. Shakur Subhi and Ismail Mahmud.

13 Q. And who is Shakur Subhi?

14 A. It says here the deliverer.

15 Q. The deliverer?

16 And is there a date?

17 A. It's August 9th, 2001.

18 Q. October or August?

19 A. August 9, 2001.

20 Q. Again, that's all original handwriting, correct?

21 A. Yes.

22 Q. Mr. Shakur Subhi signed?

23 A. Shakur Subhi signed and so did Ismail. And Abu Sarmad
24 also signed.

25 Q. I was going to get to that.

1 Who signed for the money?

2 A. Abu Sarmad.

3 Q. What's the date?

4 A. August 8th, 2001.

5 Q. Do you know who Abu Sarmad is?

6 A. I know that Sami Khoshaba is referred to as Abu Sarmad.

7 Q. Did you ever refer to him as Abu Sarmad?

8 A. Yes.

9 Q. Well, in all the documents we saw, there is references
10 to a Sami Khoshaba or Sami Khoshaba Latchin, but not an Abu
11 Sarmad. Why is that?

12 A. Yes. Because usually when you refer to a person by Abu
13 such and such name, that would be done on a social basis, not
14 in an official practice.

15 Q. How do you refer to him?

16 A. In the official correspondence, we refer to people by
17 their real names.

18 Q. How are you referred to?

19 A. Abu Asil.

20 Q. Can you spell that?

21 A. A-s-e-e-l. And Abu, A-b-o.

22 THE INTERPRETER: A-b-u.

23 BY THE WITNESS:

24 A. A-b-u. And Asil, A-s-i-l is better.

25 MR. CONWAY: Thank you.

1 Your Honor, I think this is a good break time.

2 THE COURT: I think so, too. I think we are kind
3 of pushing on.

4 Okay. 9:30 tomorrow morning, ladies and gentlemen.

5 The witness will be excused until tomorrow. Thanks
6 very much to the interpreter. This is a long day for you,
7 sir.

8 All the jurors are excused until 9:30 tomorrow.

9 Ladies and gentlemen, on Friday we are going to
10 break at 1:00. I think I have already mentioned that, but
11 just let me make this clear. We are going to break at 1:00
12 on Friday for the day. And I think what we will do is just
13 take one morning break and no lunch break. So we will just
14 work through from about 9:15 until 1 o'clock and that will be
15 it for the day.

16 All right. We are excused for the day. Reminder
17 that you should not be discussing the case with anybody, not
18 even one another.

19 (Jury out at 4:57 p.m.)

20 THE COURT: Okay. We will see you all in the
21 morning.

22 (An adjournment was taken at 5:04 p.m.)F

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