

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

UNITED STATES OF AMERICA

v.

Case No. 8:03-CR-77-T-30TBM

SAMEEH HAMMOUDEH
_____ /

AMENDED DEFENDANT'S EXHIBIT LIST

COMES NOW the Defendant, SAMEEH HAMMOUDEH by and through his undersigned counsel, and pursuant to the Florida Rules of Criminal Procedure, files the following Exhibit List:

Books:

1. Baker, James Addison: The Politics of Diplomacy: Revolution, War and Peace, 1989-1992
2. Nafi, Bashir
Arabism, Nationalism, Islamism and the Palestinian Question.
3. The Complete Works of Dr. Fathi Al-Shiqaqi, (in Arabic)
4. Hammouceh, Sameeh
Awareness and Revolution: A Study in the Life and Struggle of Sheik Izz-al-Din Al-Qassam, 1882-1935
5. Studies in Heritage
A book by the Heritage and Islamic Civilization Committee at the Arab Studies Society, (in Arabic).
6. Arabic Studies
A book published by the Research Center at the Arab Studies Society, (in Arabic).
7. Al-'Araf, 'Aaref:
The Catastrophe of Palestine and the Lost Paradise, 6 volumes, (in Arabic). Bates #501141-501146.

8. Al-Dabagh, Mustafa Murad:
Our Country Palestine, 11 volumes. (In Arabic) Bates #501147
9. The Encyclopedia of Politics, 6 volumes, (in Arabic)
10. The Encyclopedia of the Beduins, 5 volumes, (in Arabic)
11. Nour-al-Din Zanki Pulpit, by Fahmi Al-ansari, (in Arabic). Bates # 501149
12. Political Readings, WISE's Journal. Issues 1-17, (in Arabic)
13. Khamaisi, Rasim: The Destruction of the Un-Authorized Buildings in the West Bank, (in Arabic). Bates #501150
14. Abu-Amr, Ziad: The Islamic Movements in the West Bank and the Gaza Strip - Hamas and the Islamic Jihad, (in Arabic). Bates #800638
15. Two notebooks of S. Hammoudeh's journals.
16. S. Hammoudeh's journals on separate sheets of papers.
17. S. Hammoudeh's 2002 Planner, Bates #800748.
18. S. Hammoudeh's notebook of journals and observations, Bates #800752
19. S. Hammoudeh's journals, Bates #800654

Telephone Conversations:

20. M. Al-Najjar to B. Nafi, on 2/15/1995
21. S. Hammoudeh to S. Al-Arian, on 5/12/2000
22. S. Al-Arian to S. Hammoudeh, on 8/23/2000
23. S. Al-Arian to Z. Rifaie, on 6/14/2000
24. S. Hammoudeh to his parents, on 3/2000
25. S. Al-Arian to Dr. Akela, on 7/11/2000
26. Tareq Yacoub and Sami Al-Qutub to Hammoudeh, on 10/8/2000.
27. M. Al-Najjar to Anas Al-Haydar, on 3/15/95
28. Husam Saad-al-Din to S. Hammoudeh, on 3/4/2001
29. Ali al-Jirbawi to R. Shallah, on 3/16/95
30. S. Hammoudeh to his parents, on 9/16/2000
31. Fawaz Damra to M. Al-Najjar, on 12/6/1994
32. S. Hammoudeh to Khalil Hammoudeh, on 10/04/2000
33. R. Shallah to A. Dabus, on 2/10/1995

34. R. Shallah to A. Dabus, on 2/12/1995
35. S. Hammoudeh to Dawoud Mikawi, on 2/28/1995
36. S. Hammoudeh to Dawoud Mikawi, on 1/28/1995
37. S. Hammoudeh to his mother, on 8/16/2000
38. S. Hammoudeh to Khalil Shikaki, on 1/28/1995
39. S. Hammoudeh to Wafi Shikaki, on 1/23/1995
40. S. Hammoudeh to Khalil Shikaki, on 1/13/1995
41. S. Hammoudeh to Dawoud Mikawi, on 1/13/1995
42. S. Hammoudeh to Dawoud Mikawi, on 12/29/1994
43. S. Hammoudeh and Anwar Rifaie to Bahiya Hammoudeh, on 12/5/1995
44. S. Hammoudeh to Taha Hammoudeh, on 1/25/1995
45. S. Hammoudeh to Hayat Oulaywat, on 6/21/2000
46. S. Hammoudeh to Faraj Hasan, on 10/17/2000
47. S. Al-Arian to Anwar Rifaie, on 8/7/2000
48. S. Al-Arian to Sa'ad Al-Ghamidi, on 6/27/2000
49. S. Hammoudeh to Taha Hammoudeh, on 8/13/2000
50. S. Hammoudeh to Anwar Rifaie, on 8/6/2000
51. S. Al-Arian to unknown male, on 6/27/2000
52. S. Hammoudeh to Bahiya Hammoudeh, on 12/9/1999
53. S. Hammoudeh to Bahiya Hammoudeh, on 12/17/1999
54. S. Al-Arian to unknown male, on 6/27/2000 at 14:14:09
55. S. Al-Arian to Rizk Mitwalli, on 10/17/2000
56. S. Al-Arian to Nadia Hammoudeh, on 10/31/1995
57. R. Shallah to S. Hammoudeh, on 1/31/1995
58. B. Nafi to M. Al-Najjar, on 9/20/1995
59. M. Al-Najjar to S. Hammoudeh, on 2/1/1995
60. S. Hammoudeh to Sheik Yacoub Qirrish, on 8/4/2000
61. R. Shallah to B. Nafi on 2/9/2000
62. Maha Nassar to R. Shallah on 2/20/1995
63. Maha Nassar to R. Shallah on 2/28/1995
64. S. Hammoudeh to Ibrahim Abu-Aziza, on 2/15/2000
65. S. Hammoudeh to Taha Hammoudeh, on 11/21/1999
66. S. Hammoudeh to Taha Hammoudeh, on 2/22/2000
67. S. Hammoudeh to Dawoud Mikawi, on 2/12/1995
68. S. Al-Arian to Assem Hasan, on 10/4/2000
69. A. Zahaliqa to M. Al-Najjar, on 12/20/1994
70. S. Hammoudeh to Nadia Hammoudeh, on 6/17/2000
71. S. Hammoudeh to Husam Saad-al-Din, on 3/15/2000
72. S. Hammoudeh to Taha Hammoudeh, on 3/10/2000
73. S. Al-Arian to unknown male, on 2/10/1994
74. S. Al-Arian to M. Al-Najjar, on 3/14/1994
75. S. al-arian to M. Al-Najjar, on 3/14/1994
76. R. Shallah to B. Nafi, on 1/21/1995

Facsimiles:

77. Dawoud Mikawi to S. Hammoudeh, on 7/15/1995
78. Dawoué Mikawi to S. Hammoudeh, on 4/25/1995
79. S. Hammoudeh to Sheik Yacoub Qirrish, on 12/26/1994.
80. S. Hammoudeh to Abdel-Lattif Abu-Hashem, on 9/10/1995
81. S. Hammoudeh to Issa Hammoude, on 9/24/1995
82. S. Hammoudeh to Qasem Abu-Harb, on 9/30/1996
83. S. Hammoudeh to A. Zahaliqa, on 9/30/1996
84. Qasem Abu-Harb to S. Hammoudeh, on 10/1/1996
85. S. Hammoudeh to Dawoud Mikawi, on 12/19/94.
86. Dawoud Mikawi to S. Hammoudeh, on 12/23/1994
87. S. Hammoudeh to Dawoud Mikawi, on 12/24/1994
88. S. Hammoudeh to Rasim Khamaisi, on 2/21/1995
89. S. Hammoudeh to Dawoud Mikawi, on 4/22/1995
90. Rasim Khamaisi to S. Hammoudeh, on 1/20/1995
91. Ramadan Shallah to unknown 5/27/1995

Documents:

92. S. Hammoudeh's interview with Al-Mahar newspaper in Chicago on 6/24/2000
93. Six articles by S. Hammoudeh published in Al-Mahjar newspaper in 2000 and 2001
94. A thank-you letter from the Friends of the Blind Association to donors.
95. A newspaper articles about the dispute between PIJ and the PA, published on 12/11/200
96. A facsimile from the editorial board of "Political Readings" to S. Hammoudeh on 12/2/1991
97. A letter sent by the editorial board of "Political Readings" to S. Hammoudeh on 7/14/1992
98. A letter from "The Intellectual Society" in Jerusalem sent to WISE on 5/15/1991
99. An Authorization to S. Hammoudeh from The Friends of the Blind Association to collect donations
100. A flyer distributed at Al-Qassam Mosque in Tampa requesting donations to the Blind Girls School in Ramallah
101. A newspaper interview with a PA official regarding the contacts between the PA and PIJ and Hamas
102. A note book for Nadia Hammoudeh
103. Five receipt voucher books, the carbon copy, provided by Taha Hammoudeh
104. Several original copies of cancelled receipts due to mistakes
105. Several original receipts of donations
106. An original cop of a facsimile sent by Nahla Al-Arian to S. Hammoudeh regarding the distribution of donations to orphans, on March 1991
107. A letter from Nahla Al-Arian to the Arab Orphan House Society, on 3/20/1991
108. Copies of receipt vouchers issued by the Friends of the Blind Association for donations

- sent by S. Hammoudeh. The copies are authenticated by the chairman of the Association.
109. Four documents pertaining to the distribution of donations in Palestine provided by Mr. Taha Hammoudeh.
 110. A letter from Mr. Taha Hammoudeh to his son regarding the distribution of funds to the orphans, August 1997
 111. A handwritten list of books shipped to Ramallah on 9/21/1996
 112. A handwritten list of books shipped to Ramallah on 11/26/1996
 113. A facsimile cover letter sent by S. Hammoudeh to Samer Al-Ramlawi at the Ministry of Finance at the PA on 10/15/1997

Arabic documents seized by the Government in 1995 and 2003:

	<u>Bates #</u>	<u>Description</u>
114.	800652	Receipt signed by Belghazi Allal.
115.	800694	A handwritten idea by S. Hammoudeh.
116.	501194	A box of miscellaneous documents seized from WISE offices in 1995. Included correspondence between S. Hammoudeh and Dr. Khalil Shikaki, letters by S. Hammoudeh to subscribers to "Political Readings," and letters from these subscribers
117.	501195	A box of miscellaneous documents seized from WISE offices in 1995. Included a letter from The American University in Beirut to S. Hammoudeh regarding "Political Readings."
118.	800749	Accounting sheets for S. Hammoudeh
119.	500141	List of individuals
120.	500145	List of individuals with their telephone numbers
121.	500663	List of frequently called numbers
122.	50013 and	
123.	501204	A facsimile from Khalil Shikaki to WISE
124.	500025	A facsimile from Khalil Shikaki to Ramadan Shallah on 12/6/1993
125.	501068 and	
126.	501078	Expenditure of WISE
127.	500821	A letter from S. Hammoudeh to Dr. Khalil Shikaki on 7/29/1993
128.	800110	An invoice of books
129.	500997	A facsimile from Al-Budeiri to S. Hammoudeh
130.	800676	A handwritten outline for a sermon delivered by S. Hammoudeh after 9/11
131.	500966	A letter from S. Hammoudeh to Al-Budeiri
132.	500899 and	
133.	500900	A facsimile from Abu-Hashem to S. Hammoudeh
134.	500007	A letter from B. Nafi to A. Al-Nafisi on 12/7/1993
135.	800756	A file titled Chicago Works
136.	800758	A handwritten notes titled "The Project."
137.	800767	A handwritten note titled "Palestine Heritage Week in Chicago."

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| 138. | 8001207 | Donations account |
| 139. | 800675 | Donations for the Blind Girls and Orphans. |
| 140. | 800720 | A handwritten notes titled "The Muslim Mind." |
| 141. | 500597 | A letter from Hammoudeh to the Arab Studies Society in Jerusalem on 3/20/1993 |
| 142. | 800730 | A handwritten note about the Saudi Salafiyya movement. |
| | 500990 | A facsimile from al-Budeiri to S. Hamoudeh |
| 143. | 500061 | A letter from Hammoudeh to B. Nafi |
| 144. | 203360 | A facsimile from Jad Jadallah to S. Hammoudeh. |
| 145. | 800985 | A receipt voucher |
| 146. | 801207 | An account regarding Hammoudeh and IAF |
| 147. | 800986 | Nadia's notebook regarding financial matters |
| 148. | 800119 | Donations ledger |
| 149. | 501102 | Al-Ummah magazine |
| 150. | 500861 | A copy of check #143 of Hammoudeh's bank account |
| 151. | 500997 | A facsimile from Al-Budeiri to Hammoudeh |
| 152. | 500986 | A facsimile from Al-Budeiri to Hammoudeh |
| 153. | 500990 and | |
| 154. | 500991 | A facsimile by Al-Budeiri to Hammoudeh |
| 155. | 5001196 | A box full of documents pertaining to the Orphan Sponsorship Project. All are relevant. Included are applications by orphans, correspondence letters, receipt vouchers, pictures, reports, lists of orphans and payments, lists of donors, and other documents |
| 156. | 800750 | Hammoudeh's ledger about the sale of books and encyclopedias |

Arabic documents with 1B numbering:

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|------|------|---|
| 157. | 1B23 | file 1 of 2; documents: |
| 158. | | #56 (A letter from the Arab Gulf Council to S. H.); |
| 159. | | #91 (A letter from Wajeeh to M. Al-Najjar); |
| 160. | | #117 (A letter from Abu-Jaber to WISE on 12/30/92): |
| 161. | | #142 (A mail envelope); |
| 162. | | #158 (A letter from Esmat re: Political Readings) |
| 163. | | #185 (A letter from Zaghaz re: Political Readings); |
| 164. | | #280 (A letter from Al-Hani); |
| 165. | | #293 (A letter from Al-Jirbawi to Shallah) |

The Government's Tech-Cuts

The defense may use any tech-cut provided by the Government. However, the following tech-cuts are most probably will be used:

	<u>Telephone #</u>	<u>Date</u>	<u>Time</u>	<u>Conversation</u>
165.	985-4343	07/27/1995	14:56	Al-Najjar and R. Margua
166.	899-0175	10/27/1999	21:17	Hammoudeh and Al-Arian
167.	899-0175	10/27/1999	21:36	Hammoudeh and Al-Arian
168.	899-0175	11/06/1999	17:32	Hammoudeh and Al-Arian
169.	899-0175	11/08/1999	08:43	Hammoudeh and Al-Arian
170.	899-0175	11/10/1999	16:39	Hammoudeh and Al-Arian
171.	899-0175	11/22/1999	08:43	Hammoudeh and Al-Arian
172.	899-0175	12/10/1999	14:48	Hammoudeh and Al-Arian
173.	899-0175	12/12/1999	16:32	Hammoudeh and Al-Arian
174.	899-0175	12/16/1999	13:40	Hammoudeh and Al-Arian
175.	899-0175	12/16/1999	04:55	Hammoudeh and Al-Arian
176.	899-0175	12/13/1999	22:04	Hammoudeh and Al-Arian
177.	899-0175	12/13/1999	22:45	Hammoudeh and Al-Arian
178.	899-0175	01/08/2000	21:33	Hammoudeh and Al-Arian
179.	899-0175	01/13/2000	22:09	Hammoudeh and Al-Arian
180.	899-0175	01/14/2000	16:44	Hammoudeh and Al-Arian
181.	899-0175	01/26/2000	16:58	Hammoudeh and Al-Arian
182.	899-0175	01/27/2000	23:18	Hammoudeh and Al-Arian
183.	899-0175	02/09/2000	21:49	Hammoudeh and Al-Arian
184.	899-0175	05/06/2000	15:48	Hammoudeh and Al-Arian
185.	899-0175	05/29/2000	22:49	Hammoudeh and Al-Arian
186.	899-0175	06/05/2000	17:38	Hammoudeh and Al-Arian
187.	899-0175	06/17/2000	21:56	Hammoudeh and Al-Arian
188.	899-0175	06/27/2000	12:33	Hammoudeh and Al-Arian
189.	899-0175	06/28/2000	19:43	Hammoudeh and Al-Arian
190.	899-0175	08/02/2000	15:31	Hammoudeh and Al-Arian
191.	899-0175	08/28/2000	21:22	Hammoudeh and Al-Arian
192.	899-0175	02/10/2001	12:56	Hammoudeh and Al-Arian
193.	899-0175	05/22/2002	16:12	Hammoudeh and Al-Arian
194.	899-0175	06/01/2002	22:49	Hammoudeh and Al-Arian
195.	899-0175	06/04/2002	16:16	Hammoudeh and Al-Arian
196.	899-0175	08/09/2002	16:39	Hammoudeh and Al-Arian
197.	899-0175	12/29/2002	10:10	Hammoudeh and Al-Arian
198.	899-0175	01/01/2003	14:29	Hammoudeh and Al-Arian
199.	731-0423	02/15/2003	17:59	Hammoudeh and Al-Arian
200.	899-0175	01/25/2000	23:46	Hammoudeh to his father
201.	987-9282	11/07/1997	12:39	Hammoudeh to UF
202.	899-0175	11/3/1999	16:55	Hammoudeh to UF
203.	899-0175	11/7/1999	09:35	Hammoudeh to his father
204.	899-0175	2/18/2001	12:53	Hammoudeh to Zahaliqa
205.	899-0175	07/02/2002	07:59	Hammoudeh to Zahaliqa

206.	899-0175	07/15/2002	08:40	Hammoudeh to Zahaliqa
207.	899-0175	02/09/2003	11:23	Hammoudeh to his father
208.	899-0175	01/06/2003	15:35	Hammoudeh to Nadira
209.	899-0175	06/06/2000	22:57	Hammoudeh to Fariz
210.	899-0175	05/08/2000	18:12	Hammoudeh to Zahaliqa
211.	899-0175	06/20/2000	00:49	Hammoudeh to Zahaliqa
212.	899-0175	06/29/2000	01:31	Hammoudeh to Zahaliqa
213.	899-0175	08/21/2000	07:15	Hammoudeh and Lama
214.	985-4343	08/23/2000	14:30	Hammoudeh and Nahla Al-Arian
215.	899-0175	08/24/2000	07:18	Hammoudeh and his father
216.	899-0175	07/07/2002	18:22	Hammoudeh and Al-Arian
217.	899-0175	08/02/2000	15:31	Hammoudeh and Al-Arian
218.	899-0175	08/03/2000	13:38	Hammoudeh and A. Rifaie
219.	899-0175	08/28/2000	21:22	Hammoudeh and Al-Arian
220.	899-0175	05/06/2000	15:48	Hammoudeh and Al-Arian
221.	899-0175	08/14/2002	23:53	Hammoudeh and his mother
222.	899-0175	10/30/1999	09:05	Hammoudeh and Sheik Qirrish
223.	899-0175	08/18/2000	23:58	Hammoudeh and his father
224.	985-4664	04/25/2002	09:28	Hammoudeh and Nour Salmab
225.	987-9282	08/04/2002	14:21	Hammoudeh and Abu Hashim
226.	987-9282	10/15/2002	09:27	Hammoudeh and UM
227.	985-4664	03/13/2001	10:20	Hammoudeh and UM
228.	899-0175	08/16/2002	16:32	Hammoudeh and his wife
229.	987-9282	05/21/2002	12:14	Hammoudeh and UM
230.	899-0175	06/04/2002	10:24	Hammoudeh and Barakat
231.	899-0175	06/04/2002	16:16	Hammoudeh and Al-Arian
232.	985-4664	06/04/2002	12:29	Hammoudeh and Fariz
233.	987-9282	06/05/2002	10:42	Hammoudeh and A. Dabus
234.	987-9282	07/08/2002	09:46	Hammoudeh and Yasin Sa'ad
235.	987-9262	07/18/2002	12:51	Hammoudeh and Fariz
236.	988-0175	06/08/2002	14:41	Hammoudeh and Ayman Osman
237.	899-0175	06/26/2002	10:41	Hammoudeh and Zaki Khaled
238.	985-4664	06/10/2002	12:06	Hammoudeh and Dina Filali
239.	985-4664	05/01/2002	13:21	Hammoudeh and Dina Filali
240.	899-0175	05/11/2000	23:12	Hammoudeh and Fariz
241.	985-4664	05/02/2000	10:57	Hammoudeh and UM
242.	899-0175	12/17/1999	21:39	Hammoudeh and Ziad Taha
243.	899-0175	12/20/1999	23:33	Hammoudeh and his mother
244.	987-9282	12/27/1999	16:31	Hammoudeh and Ibrahim Khader
245.	899-0175	12/29/1999	04:11	Hammoudeh and his father
246.	899-0175	01/06/2000	09:05	Hammoudeh and Tawfiq
247.	899-0175	01/08/2000	12:38	Hammoudeh and Tawfiq
248.	899-0175	01/17/2000	23:42	Hammoudeh and his parents

249.	899-0175	01/18/2000	14:09	Hammoudeh and his father
250.	899-0175	02/05/2000	00:12	Hammoudeh and his parents
251.	899-0175	10/12/2002	14:39	Hammoudeh and his father
252.	899-0175	01/25/2003	11:10	Hammoudeh and his father
253.	899-0175	10/21/2000	03:34	Hammoudeh and Sheik Qirrish

Videos:

- 255. Video about the blind girls school
- 256. Video # 17G26 Khikaki's lecture
- 257. Video # 17D VCR A-30

Financial and Bank Records of:

- 258. Sameeh Hammoudeh
- 259. Raammdam Shallah and Maha Nassar
- 260. ICP-M.W.S. (especially # 1023, 1027, 1035)
- 261. Khalil Shikaki (especially # 621, 698, 951)

Arabic Documents:

- 262. 1B23 file 2 of 2 : doc. # 9 (letters from Rasim Khamaisi to Mazen Al-Najjar); (letter from Sahar Ramhi to Qawash); doc. #45 (letter from Rida to WISE).
- 263. 1B24 file 1 of 2: doc #2 (receipt by Abu-Shukr); doc. #1 (69 sheets with receipts attached); doc. #5 (Columbin Un. Press books); doc #6 (letter of resignation by Shallah).
- 264. 1NB32 file 2 of 3: doc #18 (Palestine Our Country encyclopedia); doc #32 (letter fro Omar al-Ramahi to Abdel-Ilah).
- 265. 1B327: doc #24 (Bank deposit slips).
- 266. 1B42 file w of 3: doc.#4 (recepts); doc #15 (letter fro mnafi to Rmadan, Mazen and Samii); (facsimile from Al-Jirbawi to Ramadan); (2 letters from Ramadan to Al-Jirbawi).
- 267. 1B42 42 file 2 of 3: doc. #48 (facsimile from K.Shikaki to Shallah) doc. #51 (facsimile from K. Shikaki to Shallah).

Dated this 3rd day of June 2005.

Respectfully submitted,
LAW OFFICE OF STEPHEN N. BERNSTEIN

/s/ Stephen N. Bernstein
STEPHEN N. BERNSTEIN
Post Office Box 1642
Gainesville, Florida 32602
Florida Bar Number 145799
Telephone: 352-373-9555
Facsimile: 352-375-6544

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of June, 2005, a true and correct copy of the foregoing has been furnished by CM/ECF, to Walter Furr, Assistant United States Attorney; Terry Zitek, Assistant United States Attorney; Cherie L. Krigsman, Trial Attorney, U.S. Department of Justice; William Moffitt and Linda Moreno, counsel for Sami Amin Al-Arian; Bruce Howie, counsel for Ghassan Ballut; and to Wadie E. Said, counsel for Hatem Naji Fariz.

/s/ Stephen N. Bernstein
Stephen N. Bernstein
Counsel for Defendant Hammoudeh