

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MUHAMMAD A. SALAH; AMERICAN)
FRIENDS SERVICE COMMITTEE; and)
AMERICAN-ARAB ANTI-DISCRIMINATION)
COMMITTEE,)

Plaintiffs,)

v.)

UNITED STATES DEPARTMENT OF THE)
TREASURY; TIMOTHY GEITHNER, in his)
official capacity as Secretary of the Treasury; and)
ADAM J. SZUBIN, in his official capacity)
as Director, United States Department of the)
Treasury, Office of Foreign Asset Control,)

Defendants.)

No.

COMPLAINT

Plaintiffs, by counsel, complain of defendants as follows:

INTRODUCTION

1. For more than seventeen years, Muhammad Salah (“Salah”), a U.S. citizen residing in Bridgeview, Illinois, has lived under an unprecedented “embargo” imposed on him by the U.S. Department of Treasury in August 1995, when it designated him a “Specially Designated Terrorist.” Upon information and belief, Salah is the only U.S. citizen residing in the United States subject to such a designation. Pursuant to the designation, all of Salah’s assets were blocked indefinitely, without a warrant, probable cause of criminal activity, or a hearing. Salah was provided no notice of the charges, no evidence upon which the designation was based, and no opportunity to respond to the charges and evidence.

2. Absent advance approval from the Treasury Department’s Office of Foreign

Assets Control (OFAC), Salah is prohibited from purchasing virtually anything, including food, clothing, and lodging, and it is a crime for any United States citizen, permanent resident, entity organized under U.S. law, or any other person in the United States or its territories to engage in virtually any transaction with Salah, including providing him with food, shelter, clothing, or many medical services—even if they are provided free of charge. Salah may not work for a living, spend money, or give or accept any donations absent advance approval by OFAC. The restrictions are so onerous that they are practically impossible to comply with.

3. OFAC has at various times granted Salah licenses that in theory authorize him to do limited things, such as get a job, open a bank account, and pay for and receive “goods and services essential to [his] basic maintenance.” But they have come with onerous obligations, and OFAC has unfettered discretion to grant or deny such licenses, subject to whatever conditions it chooses. Salah survives, in other words, only at the sufferance of OFAC. Moreover, because OFAC has authorized only basic maintenance, he is prohibited from engaging in transactions necessary to do anything that might not be deemed “basic maintenance,” and thus is left to guess at whether spending money for any of the following activities are permissible: attending a lecture, concert, or movie with his wife; taking his children to a sporting event; buying his children birthday presents; contributing to a political campaign; purchasing a book or newspaper; or satisfying his religious charitable obligations by donating to his local mosque or other charitable entities. As a result of his designation and the onerous reporting requirements OFAC has attached to licensing a bank account, Salah has been unable, with one short-lived exception, to identify a bank that will accept an account on his behalf. It has also been all but impossible for him to find employment. Salah has lived under these unprecedented conditions for more than seventeen years, with no end in sight. No other U.S. citizen must seek such specific advance

approval from the government for his every transaction.

4. Defendants imposed these restrictions without a criminal or civil trial, administrative hearing, or even notice and an opportunity to respond. They did so under the authority of Executive Order 12947, which in turn was promulgated pursuant to the International Emergency Economic Powers Act (IEEPA), 50 U.S.C. § 1701 *et seq.* Defendants provided Salah no notice of the factual basis for their action, and no opportunity to respond. He was not even provided with the administrative record upon which the designation was presumably based. There is no endpoint to the designation and its restrictions. Nor is there any requirement that defendants review the designation at any point. Defendants have never sought or received any judicial approval of their actions. They did not seek a judicial warrant in advance of imposing these restrictions, which amounted to an indefinite seizure of the entirety of his assets. And they did not go to a court after the seizure to demonstrate their basis for doing so, as they would have to do in a civil forfeiture action. While regulations permit designated persons to request reconsideration, the regulations impose no standards for that process nor any deadline for OFAC to rule on such requests. OFAC need not even issue a statement of reasons for its designations.

5. The restrictions on designated persons also prohibit U.S. citizens and entities and persons in the United States or its territories from providing any support, specifically including “services,” to designated persons. Defendants have taken the position that the restrictions bar any “coordinated advocacy” by U.S. entities or persons with and on behalf of a designated entity. The American Friends Service Committee (AFSC), and the American-Arab Anti-Discrimination Committee (ADC) and its members, object to the treatment of Salah and seek to express their objections publically, by holding press conferences, advocating on Salah’s behalf in the public arena, participating in demonstrations, and the like. They want to coordinate their efforts with

Salah so as not to undermine his legitimate interests in challenging his treatment. However, they are deterred from doing so by the prohibitions on providing support or services to, engaging in transactions with, or coordinating advocacy with, Salah.

6. Salah seeks a declaration that these actions violate the Constitution and federal statutes, and an injunction against their enforcement and ordering his removal from the list of “Specially Designated Terrorists.” AFSC and ADC seek a declaration that the restrictions on their speech violate their First Amendment rights, and the First Amendment rights of ADC’s members, and an injunction against their enforcement as applied to their intended activities.

JURISDICTION

7. This Court has jurisdiction under and 28 U.S.C. §§ 1331 and 1346(a)(2), and 5 U.S.C. §§ 702-704 and 706.

VENUE

8. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(e)(3) because plaintiff Salah resides in this District and the defendants are the United States Department of the Treasury, an agency of the United States; Timothy Geithner, the Secretary of the Treasury, in his official capacity, and Adam Szubin, the Director of the Office of Foreign Assets Control, in his official capacity.

PARTIES

9. Plaintiff Muhammad Salah is a citizen and resident of the United States and the State of Illinois.

10. Plaintiff American Friends Service Committee is a national Quaker organization that includes people of various faiths who are committed to social justice, peace, and humanitarian service. Its headquarters are in Philadelphia, PA, and it has a branch office in

Chicago, Illinois. It sues on its own behalf.

11. Plaintiff American-Arab Anti-Discrimination Committee is a civil rights organization committed to defending the rights of people of Arab descent and promoting their rich cultural heritage. It sues on behalf of itself and its members, who include residents of Chicago, Illinois.

12. Defendant United States Department of the Treasury is an agency of the United States.

13. Defendant Timothy Geithner is the Secretary of the Treasury, and is authorized by Exec. Order 12947 to designate persons and entities as “Specially Designated Terrorists.” He is sued solely in his official capacity.

14. Defendant Adam J. Szubin is the Director of OFAC, and is responsible for enforcing the restrictions upon Salah challenged here. He is sued solely in his official capacity.

ALLEGATIONS RELEVANT TO ALL COUNTS

15. On January 23, 1995, William Jefferson Clinton, then the President of the United States, issued Executive Order 12947, “Prohibiting Transactions with Terrorists Who Threaten to Disrupt the Middle East Peace Process.” 60 Fed. Reg. 5079. That Order declared a national emergency to deal with violent acts by foreign terrorists that disrupt the Middle East peace process. The Order imposed economic sanctions upon three categories of persons and organizations: (1) foreign organizations designated in an annex to the Order as “Terrorist Organizations Which Threaten to Disrupt the Middle East Peace Process;” (2) foreign persons designated by the Secretary of State as being involved in violent acts disrupting the Middle East peace process; and (3) persons that the Secretary of the Treasury designated as being “owned or controlled by” or “act[ing] for or on behalf of” any person or organization in category 1 or 2.

16. On or about July 24, 1995, defendants designated Muhammad Salah a “Specially Designated Terrorist” pursuant to Executive Order 12947 §1(a)(iii). 60 Fed. Reg. 41152. The designation notice – which was never sent to Salah – simply announced that Salah had been designated, and provided no factual or legal basis for defendants’ decision. Defendants did so without seeking a warrant or any other judicial authorization, and without establishing probable cause. Defendants provided Salah no prior notice regarding its action. The first anyone in his family learned of defendants’ actions was when Salah’s wife was unable to withdraw funds from their bank account and the local bank, not the defendants, informed her of the freeze on assets. Even after they designated him, defendants afforded Salah no notice of the bases for its action, no hearing, no opportunity to respond, and no statement of reasons. Contrary to long-established constitutional requirements, defendants have never even provided him with the administrative record upon which its decision was based.

17. Defendants’ designation of Salah as a Specially Designated Terrorist imposes extremely severe restrictions on Salah. Pursuant to Executive Order 12947 and Salah’s designation, all property and interests in property of Salah are “blocked.” They cannot be “transferred, paid, exported, withdrawn or otherwise dealt in” unless the government issues a special license permitting a particular use of them. 31 C.F.R. § 595.201(a). Defendants’ designation of Salah as a Specially Designated Terrorist (hereinafter collectively referred to as “the orders”) also has the legal effect of forbidding Salah to engage in any economic transaction with any person in the United States or its territories, and forbidding any person in the United States to make “any contribution of funds, goods, or services” to Salah. 31 C.F.R. § 595,204. The designation deprived Salah of all his assets, and forbade him, absent specific approval from OFAC, from buying, selling, or even accepting as a gift anything (including food, clothing,

lodging, transportation, medicine, and legal services) from any person in the United States or its territories. The restrictions have no exceptions for life-sustaining expenses. They have no endpoint, and have already lasted seventeen years.

18. On information and belief, Salah is the only United States resident citizen designated as a Specially Designated Terrorist pursuant to the provisions of Executive Order 12947. All other designated individuals on the list reside outside the United States, and virtually all are foreign nationals.

19. Because defendants have never provided notice of the basis for their actions or a statement of reasons, Salah does not know why he was designated.

20. At the time Salah was initially designated in 1995, he was incarcerated in a military prison in Israel. Salah was arrested in 1993 by Israeli soldiers in Israel and charged before an Israeli military court with assisting Harakat Al-Muqawama Al-Islamia (“Islamic Resistance Movement”), or Hamas. At the time, U.S. law did not prohibit the provision of support to Hamas. (U.S. law did not prohibit support to Hamas until 1995, when President Clinton issued E.O. 12947.) The Israeli authorities told Salah that the evidence that would be presented against him was “secret,” and that he would not be made aware of it or given a chance to rebut it, and that if convicted, he would be sentenced to 12 years in prison. After two months of interrogation and more than two years in an Israeli military prison, far removed from his wife and children, Salah pleaded guilty, and received a 5-year sentence (counted from the time of his arrest), with an additional 3-year suspended sentence. He was released in November 1997 and returned to his home in Bridgeview, Illinois, where he has resided ever since.

21. In February 1998, Salah, through counsel, requested a license allowing him to be employed, to enroll in graduate education, to have a bank account, and to spend money to

support his wife and family and his own living expenses, as well as to travel to visit friends and family. On April 2, 1998, OFAC granted Salah a license, which it denominated License No. SDT-005. (Exhibit A).

22. The license did not grant all that Salah requested but permitted him to: (1) obtain employment; (2) pay for “graduate education;” (3) pay for “normal living and employment related expenses of himself and his immediate family;” and (4) “engage in all transactions necessary and incidental to the foregoing activities.” It did not further define those terms. OFAC denied his request to spend money necessary to travel to visit his friends and family. The license authorized other persons to enter into transactions with Salah to fulfill the above prescribed purposes, and to make contributions to him for educational purposes only. The license required that any employment income must be deposited in a licensed bank account, and Salah was authorized to withdraw funds from that account only for the specific limited purposes set forth above. The license required Salah and any bank willing to open such an account for him to file with OFAC documents confirming the opening of the account no later than July 31, 1998. The license provided that all other transactions were prohibited, and required regular reporting by both Salah and the bank.

23. From 1998-2000, Salah and his counsel approached nearly every major bank in downtown Chicago in an effort to open a licensed account. Each bank refused because of the onerous licensing and reporting requirements OFAC imposed. Salah made many attempts to find employment, but the fact that he had to inform prospective employers that he was a "Specially Designated Terrorist" made finding a job difficult. Eventually, in August 2000, he was able to find employment, but without having been able to open a bank account, could not cash his checks. He repeatedly requested OFAC to allow him to self-report, given his difficulty

in finding a bank that would open an account, but OFAC never granted the request.

24. In April 2001, Salah was finally able to get Bridgeview Bank to agree to open an account for him, and only then could he cash the eight months of paychecks he had been receiving from his job. By that time, SDT-005's reporting deadline of July 31, 1998, had long passed, but OFAC confirmed orally to counsel for Salah that the license continued to authorize Salah to undertake the activities described therein. (Exhibit B) (letter confirming this oral representation). Pursuant to License No. SDT-005, Salah and the bank filed bi-monthly reports detailing all deposits to and expenditures from the account to OFAC.

25. In May 2004, Bridgeview Bank closed Salah's account, stating: "It has been determined that it is not cost effective to maintain an account relationship with you. The maintenance and regulatory requirements associated with [your] account . . . far exceeds any benefit to Bridgeview Bank Group." (Exhibit C). He has been unable to open a bank account since that time.

26. In August 1998 counsel for Salah requested and received a license, denominated SDT-009, from OFAC allowing "U.S. persons to provide medical services to Muhammad A. Salah." (Exhibit D). He has recently been diagnosed with cancer, and is receiving treatment.

27. In May 2007, Salah's automobile insurance provider, MetLife, cancelled his insurance on the ground that he was a "Specially Designated Terrorist."

28. In August 2005, Salah was indicted under the Racketeering Influenced and Corrupt Organizations Act (RICO), 18 U.S.C. §§ 1961–1968, based on his alleged involvement with Hamas. He was also charged with obstruction of justice in connection with interrogatory responses he provided in private civil litigation. The jury acquitted Salah of the RICO charges related to alleged involvement with Hamas. Upon information and belief, defendants never

considered the effect of Salah's acquittal on whether he should continue to be designated as a Specially Designated Terrorist. Salah was convicted of one count of obstruction of justice for allegedly providing false statements on interrogatory responses in civil litigation. (The jury did not identify which interrogatory response it deemed false). In July 2007, Salah was sentenced to 21 months in prison, and was released in April 2009.

29. Because the previous license was more than a decade old, contained an expired due date of July 1998, and might be viewed by any prospective employer or bank with skepticism, counsel for Salah in July 2009 requested from OFAC confirmation that SDT-005 remained in effect, or a new license.

30. On September 22, 2009, OFAC revoked Salah's previous license, SDT-005, and issued a new license, SDT-110. (Exhibit E). Inexplicably, this license was effective for only two months, through November 2009. It authorized Salah to engage only in transactions reasonably necessary to: (1) "purchase, make payments for, and receive goods and services essential to the basic maintenance of the Licensee, including rent, food, clothing, medical care, transportation, insurance and utilities;" (2) make payments for legal services; (3) seek employment; and (4) open a bank account. However, it provided that even as to these limited authorized expenses, payment could not "originate from a source in the United States," and therefore Salah's family, friends, and any other supporters in the United States were barred from helping him subsist. The license provided that a transaction for any purpose other than those specifically authorized was prohibited.

31. Thus, Salah was and is prohibited from engaging in a wide range of economic transactions, including, for example, any transaction incident to: purchasing a book or newspaper; attending a lecture, concert, or sporting event; donating to or volunteering his

services to a political candidate; buying his wife flowers or other gifts; or any activity other than “basic maintenance.” The license further required him to keep records demonstrating that each and every transaction fell within the “basic maintenance” contours authorized. This would require him to maintain records of every item of food or clothing that he purchased, every bus or other public transportation trip he took, every gallon of gas that he purchased, etc. These requirements are so sweeping that they are for all practical purposes impossible to comply with.

32. Salah’s Muslim faith requires that he make regular donations to charity, called “zakat.” Since his designation, however, IEEPA, the Executive Order and OFAC regulations have barred him from doing so, thereby imposing a substantial burden on the exercise of his religion. He has refrained from making zakat donations because of the restrictions imposed on him by defendants’ designation. Observant Muslims are also required to do a pilgrimage to Mecca (“haj”), the birthplace of the Prophet Muhammad, at least once, and are urged to do so more often over the course of their lives. Salah has never gone on haj with his wife and children, and would like to observe his religious tenets in this manner, but cannot do so because of the restrictions imposed on him by the defendants’ designation.

33. OFAC regulations provide a general license for certain uncompensated legal services and emergency medical services to a designated person. 31 C.F.R. §§595.506, 595.507. Any payment for such services, however, must be specifically authorized by OFAC. *Id.* In addition, the prohibitions on transactions do not apply to personal communications having no value, import and export of certain informational materials, and certain expenses associated with travel in another country. 31 C.F.R. §§595.206. Thus, Salah could spend money without an OFAC license in Canada, Israel, or the West Bank and Gaza, but may not do so in his hometown of Bridgeview. However, there are no general licenses for basic living expenses.

34. Nothing in the statutes, executive order, or regulations requires defendants to review or reconsider Salah's status on any regular basis, or to justify his treatment to a court. Upon information and belief, defendants have never reviewed Salah's designation since its initial imposition in 1995. Even if Salah were to seek reconsideration, the regulations do not require defendants to rule on such requests in any reasonable period of time, or to offer any reasons for their actions.

35. AFSC and ADC are concerned about the fairness and legality of defendants' treatment of Salah. These organizations, and ADC's members, seek to advocate in coordination with Salah on his behalf in order to register their objections to his treatment, and express their views on this issue of public concern. They do not want to undermine Salah's interests, so would like to coordinate their advocacy with him to ensure that it is expressing their mutual concerns. Defendants have taken the position in other litigation, however, that "coordinated advocacy" engaged in for the benefit or on behalf of a designated person or entity is barred by the prohibitions on the provision of "service" and "support" to designated persons or entities. *See Al Haramain Islamic Found. v. U.S. Dep't of Treasury*, 660 F.3d 1019 (9th Cir. 2011), *amended and superseded by* 686 F.3d 965 (9th Cir. 2012). AFSC, ADC, and ADC's members are afraid that if they engage in such coordinated advocacy, they may be subject to enforcement action by defendants, including but not limited to designation and civil and criminal penalties.

COUNT I
SUBSTANTIVE DUE PROCESS

36. Plaintiff incorporates herein by reference paragraphs 1-35, *supra*, as if fully set forth herein.

37. Defendants' actions impose severe, arbitrary and indefinite restraints on Salah's ability to engage in virtually any transactions without approval from OFAC in its unfettered

discretion, including transactions necessary to sustain himself and his family, and to engage in a wide range of constitutionally protected activities. The restrictions are imposed indefinitely, without any regular reconsideration or approval by a court. And they appear to have been imposed for his alleged connections to Hamas, before connections to Hamas were prohibited by U.S. law, and therefore without any notice that his activity was proscribed. For these reasons, defendants' actions violate Salah's substantive due process rights guaranteed by the Fifth Amendment.

**COUNT II
PROCEDURAL DUE PROCESS**

38. Plaintiffs incorporate herein by reference paragraphs 1-37, *supra*, as if fully set forth herein.

39. Defendants' actions described above have deprived and continue to deprive Salah of liberty and property interests without notice or a meaningful opportunity to respond, and thereby deprived him of procedural due process, in violation of the Fifth Amendment.

**COUNT III
IMPOSITION OF CRIMINAL PUNISHMENT WITHOUT TRIAL**

40. Plaintiffs incorporate herein by reference paragraphs 1-39, *supra*, as if fully set forth herein.

41. Defendants' designation has imposed an indefinite punitive restraint, already lasting more than seventeen years with no end in sight, on Salah engaging in any economic transaction without specific OFAC approval. The indefinite imposition of such a severe sanction in these circumstances amounts to criminal punishment without affording him his Fifth and Sixth Amendment rights to notice of the charges against him, the right to confront any witnesses against him, compulsory process for obtaining witnesses in his favor, trial by jury, and the right

to assistance of counsel.

**COUNT IV
FIRST AMENDMENT - SALAH**

42. Plaintiffs incorporate herein by reference paragraphs 1-41, *supra*, as if fully set forth herein.

43. Defendants' actions, by blocking Salah's use of his property, forbid him from spending any money on speech or associational activities absent prior approval from OFAC, effectively imposing a prior restraint in violation of Salah's First Amendment rights to freedom of speech, freedom of association, and free exercise of religion.

**COUNT V
FIRST AMENDMENT – AFSC AND ADC**

44. Plaintiffs incorporate herein by reference paragraphs 1-43, *supra*, as if fully set forth herein.

45. Defendants' actions, by prohibiting AFSC, and ADC from coordinating with Salah in advocacy on matters of mutual and public concern, including the constitutional issues surrounding defendants' treatment of Salah, violate their First Amendment rights to freedom of speech and association.

**COUNT VI
RELIGIOUS FREEDOM RESTORATION ACT**

46. Plaintiff incorporates herein by reference paragraphs 1-45, *supra*, as if fully set forth herein.

47. Defendants' actions, by prohibiting Salah from entering into any transactions in pursuit of the exercise of his religion, including meeting his obligations to make charitable donations, or "zakat," violates the Religious Freedom Restoration Act, 42 U.S.C. § 2000bb et

seq.

**COUNT VII
ADMINISTRATIVE PROCEDURES ACT**

48. Plaintiff incorporates herein by reference paragraphs 1-47, *supra*, as if fully set forth herein.

49. Defendants' designation is arbitrary and capricious, because it denied Salah any notice or opportunity to respond to the legal or factual bases for the decision, and therefore is based on an incomplete record that fails even to consider Salah's evidence, and because the record does not establish that Salah falls within the category of persons subject to designation.

PRAYER FOR RELIEF

WHEREFORE, plaintiffs seeks

A. A declaration that defendants' designation has violated plaintiff Salah's statutory and constitutional rights;

B. An injunction requiring defendants to lift the designation and to remove the restrictions upon him and his property associated therewith;

C. A declaration that the restrictions on AFSC and ADC's ability to engage in advocacy in coordination with Salah in support of a challenge to his treatment violates their First Amendment rights to speech and association, and an injunction barring enforcement of IEEPA or its implementing regulations with respect to plaintiffs' coordinated advocacy.

D. An award of attorneys' fees and costs pursuant to the Equal Access to Justice Act (28 U.S.C. § 2412);

E. Such other and further relief as this Court determines to be just and equitable.

Dated: September 5, 2012

Respectfully submitted,

/s/ Matthew J. Piers
One of Plaintiffs' Attorneys

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Exhibit A



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

License No. SDT-005

LICENSE

TERRORISM SANCTIONS REGULATIONS

(Granted under the authority of Section 203 of the U.S. International Emergency Economic Powers Act (50 U.S.C. § 1702), Executive Order 12947, and 31 C.F.R. Parts 501 and 595.)

To: Muhammad A. Salah
c/o: Matthew J. Piers, Esq.
Gessler, Hughes & Socol, Ltd.
Three First National Plaza, 70 West Madison Street, Suite 2200
Chicago, IL 60602-4205

1. Based on the February 9 and 20, 1997 application letters of Matthew J. Piers, Esq. (the "Application") and information otherwise available to the Office of Foreign Assets Control regarding the subject thereof, the transactions and activities delineated on the reverse hereof are hereby authorized.
2. This license is granted upon the statements and representations made in the Application, or otherwise filed with or made to the Treasury Department as a supplement to the Application, and is subject to the condition, among others, that the licensee(s) will comply in all respects with all regulations, rulings, orders and instructions issued by the Secretary of the Treasury under the authority of Section 203 of the International Emergency Economic Powers Act (50 U.S.C. § 1702), and the terms of this License.
3. The licensee(s) hereunder shall furnish and make available for inspection any relevant information, records or reports requested by the Secretary of the Treasury, or any other duly authorized officer or agency.
4. This license is not transferable, is subject to the provisions of Parts 501 and 595 of Title 31 of the Code of Federal Regulations and any regulations and rulings issued pursuant thereto, and may be revoked or modified at any time in the discretion of the Secretary of the Treasury. If this license was issued as a result of willful misrepresentation on the part of the applicant or his duly authorized agent, it may, in the discretion of the Secretary of the Treasury, be declared void from the date of its issuance, or from any other date.
5. This license does not excuse compliance with any law or regulation administered by the Office of Foreign Assets Control or another agency (including reporting requirements) applicable to the transaction(s) herein licensed, nor does it release licensee(s) or third parties from civil or criminal liability for violation of any law or regulation.

Issued by direction and on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

By Richard Newcomb
R. Richard Newcomb
Director

Richard Newcomb 2/12/97

Attention is directed to 18 U.S.C. section 1001 and 50 U.S.C. section 1705, and 31 C.F.R. Part 595 for provisions relating to penalties.

License No. SDT-005

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SECTION 1 - AUTHORIZATION: (a) Subject to the conditions stated herein, Muhammad A. Salah is hereby authorized to be employed and receive employment income, without such income being subject to blocking; to enroll in and pay for graduate education, and to pay for the normal living and employment-related expenses of himself and his immediate family, whether from his own earnings or through contributions received after the issuance of this license from others as authorized below; and to engage in all transactions necessary and incidental to the foregoing activities, provided that such transactions and activities do not involve dealings in funds or other property that is blocked pursuant to Executive Order 12947 and 31 C.F.R. Part 595.

(b) U.S. persons are hereby authorized to employ Mr. Salah, provide transportation, employee benefits, and educational services to Mr. Salah, and to engage in other transactions and activities related to the transactions and activities authorized in § 1(a) above, provided that all salary or compensation (net of withheld taxes and employee benefit contributions) paid to Mr. Salah in connection therewith is by check or wire transfer identifying Mr. Salah's employer and all such checks or wire transfers are deposited into an account to be established at a domestic branch of a U.S. financial institution (the "Bank") for the sole purpose of receiving such deposits (the "Employment Account"). This license also authorizes Mr. Salah to withdraw funds from the Employment Account and expend such amounts, provided that all withdrawals or debits from the Employment Account are for the reasonable and normal living expenses of Mr. Salah and his family, including Mr. Salah's and his family's educational expenses.

(c) U.S. persons are also authorized to contribute funds to Mr. Salah for expenses directly related to his education, and Mr. Salah is authorized to receive such contributions, provided that such contributions are by check and such funding does not involve debits to blocked accounts or dealings in blocked funds or property, and all such amounts are deposited into an account to be established at the Bank for the sole purpose of receiving such funds (the "Educational Account"). Nothing in this license authorizes cash deposits to the Educational Account. Mr. Salah is authorized to withdraw and expend amounts from the Educational Account for payment of his tuition, books, and other expenses directly related to his education, and for no other purpose, provided that all such withdrawals and expenditures are effectuated by checks drawn to the order of a named payee on the Educational Account.

(d) Other than as expressly set forth above, nothing in this license authorizes transactions and activities that are prohibited by Executive Order 12947 and 31 C.F.R. Part 595.

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SECTION 2 - CONDITIONS: It is a condition of this license that:

(a) A copy of this license be provided to the Bank, and Mr. Salah and the Bank disclose to the Office of Foreign Assets Control information regarding the establishment of the Employment Account and the Educational Account, prior to effectuating withdrawals from these accounts. Such disclosure shall be submitted to the Office of Foreign Assets Control, Compliance Division, 1500 Pennsylvania Avenue, N.W., ANX, Washington, D.C. 20220, within 10 days after the opening of the Educational Account and the Employment Account but not later than July 31, 1998, and shall include a copy of documents from the Bank confirming the opening of the Employment Account and the Educational Account, a copy of documents from the Bank which reveal the Employment Account's and the Educational Account's account numbers, their location or address, the identity of the person to whom the Employment Account and the Educational Account belong, and the identity of the persons empowered to write checks or make withdrawals from the Employment Account and the Educational Account.

(b) Mr. Salah be the only person empowered to make withdrawals from or to otherwise operate the Employment Account and the Educational Account.

(c) Mr. Salah be enrolled in a state-accredited educational institution prior to utilizing funds from the Educational Account for educational expenses¹ and that he continue to be in good standing at such institution in order to continue to utilize funds from the Educational Account for educational and education-related expenses; and

SECTION 3 - BI-MONTHLY REPORTING REQUIREMENTS FOR MR. SALAH: It is a further condition of this license that Mr. Salah provide bi-monthly reports to the Office of Foreign Assets Control disclosing or reporting:

(a) his enrollment in and continuing good standing in a state-accredited educational institution;

(b) his employment status, which report(s) shall disclose the identity and address of his employer(s), describe his employment position, and include copies of documentation regarding his net pay or compensation from all sources in connection with his employment, including copies of all pay stubs and checks received in connection therewith; and

(c) all deposits to and withdrawals from the Employment Account and the Educational Account indicating the source of each deposit and the purpose of each withdrawal from these accounts. Such reports shall include copies of account

¹ Mr. Salah is, however, authorized to withdraw up to \$200.00 from the Educational Account for the purpose of paying for application fees associated with his application to a state-accredited educational institution.

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statements from the Bank for the 2 month period for which a report is being filed and a copy of all checks drawn on the Employment Account, and a copy of all checks deposited into and drawn on the Educational Account.

The first bi-monthly report required under this license is to be received by the Office of Foreign Assets Control no later than the close of business on July 31, 1998. Thereafter, reports are to be received no later than 30 days after the 2 month period for which they are being filed. In the event no reportable transactions occur with during a reporting period, a statement is to be filed to that effect. All reports due hereunder are to be delivered to: Compliance Programs Division, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, N.W., Treasury ANX, Washington, D.C. 20220, and are to reference this license number, SDT-005.

SECTION 4 - BI-MONTHLY REPORTING REQUIREMENTS FOR THE BANK: It is a further condition of this license that the Bank provide the Office of Foreign Assets Control with bi-monthly reports consisting of copies of the account statements for the Employment Account and the Educational Account for the 2 month period for which a report is being filed.

The first bi-monthly report required under this license is to be received by the Office of Foreign Assets Control no later than the close of business on July 31, 1998. Thereafter, reports are to be received no later than 30 days after the 2 month period for which they are being filed. In the event no reportable transactions occur with during a reporting period, a statement is to be filed to that effect. All reports due hereunder are to be delivered to: Compliance Programs Division, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, N.W., Treasury ANX, Washington, D.C. 20220, and are to reference this license number, SDT-005.

SECTION 5 - PRECEDENCE: This license is issued on a nonprecedential basis.



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

License No. SDT-005-A

TECHNICAL CORRECTION

TERRORISM SANCTIONS REGULATIONS


(Granted under the authority of Section 203 of the U.S. International Emergency Economic Powers Act (50 U.S.C. § 1702), Executive Order 12947, and 31 C.F.R. Parts 501 and 595.)

To: Muhammad A. Salah
c/o: Matthew J. Piers, Esq.
Gessler, Hughes & Socol, Ltd.
Three First National Plaza, 70 West Madison Street, Suite 2200
Chicago, IL 60602-4205

1. The first sentence of the first numbered paragraph on page one of License No. SDT-005 is corrected to refer to the February 9 and 20, 1998 application letters of Matthew J. Piers, Esq., instead of letters dated February 9 and 20, 1997.
2. All other terms, conditions, and provisions of License No. SDT-005 are unaltered by this and remain in force.
3. A copy of this Technical Correction should be attached to License No. SDT-005.

Issued by direction and on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

By 
Steven I. Pinter
Chief, Licensing Division

Attention is directed to 18 U.S.C. section 1001 and 50 U.S.C. section 1705, and 31 C.F.R. Part 595 for provisions relating to penalties.

Exhibit B

**GESSLER,
HUGHES &
SOCOL, LTD.**

Benjamin P. Beringer
Gary N. Chodorow
Ruth M. Dunning
Mark S. Dym
George W. Gessler
John K. Hughes
Joshua Karsh

Kimberley Marsh
Terence J. Moran
Donald G. Peterson
Matthew J. Piers
Kalman D. Resnick
Frederick S. Rhine
Jonathan A. Rothstein

Mary M. Rowland
D. Kaner Socol
Mark B. Weiner

Cathy L. Higgins
Anthony S. Hui
Bernice Jacobs
Nicholas J. Scarpelli
Terence G. Tiu
Fazila Vaid
J. Eric Vander Arend

ATTORNEYS AT LAW

March 20, 2001

FILE COPY

VIA FACSIMILE 202/622-1657 AND U.S. MAIL

R. Richard Newcomb, Director
Office of Foreign Assets Control
Department of the Treasury
Washington, D.C. 20220

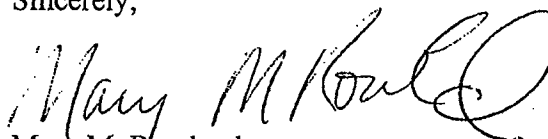
Re: Muhammad A. Salah, License No. SDT-005-A

Dear Mr. Newcomb:

This letter memorializes a telephone conversation I had with Ms. Jo Ann Chin of your office earlier today. As you know License No. SDT-005-A was issued on April 2, 1998 and allowed Mr. Salah to establish an Employment Account and an Education Account. Mr. Salah is anxious to open an Employment Account and has found a bank that is willing to establish such an account for him in accordance with the terms of the license. Mr. Salah, believing that he needed to have the dates contained in license updated from July 31, 1998 to the present, petitioned your office for a modification of the license earlier this year.

According to Ms. Chin, the Chief Counsel's office has determined that License No. SDT-005-A is still in effect and does not require any modification. Accordingly, Mr. Salah is free to open an Employment Account immediately, so long as he complies with the various requirements contained in the license. Pursuant to Section 2(a) of the license, Mr. Salah shall notify your office within 10 days of establishing the account.

Sincerely,


Mary M. Rowland

MMR/sej

cc: Mr. Muhammad Salah
Ms. Jo Ann Chin

Exhibit C

E MEDIVAN

PHONE NO. : 7084303922

May. 12 2004 04:53PM P02



7940 S. Harlem Ave. | Bridgeview, IL 60455
T: 708.594.7400 | F: 708.594.3677
www.bridgerviewbank.com

May 7, 2004

Muhammad A. Salah
9229 S. Thomas
Bridgeview, IL, 60455

Mr. Salah,

It has been determined that it is not cost effective to maintain an account relationship with you. The maintenance and regulatory requirements associated with account #10101476 far exceeds any benefit to Bridgeview Bank Group.

Therefore, I hereby request that you close out the aforementioned account by May 28, 2004. Failure to close out the account will result in immediate closure on May 29, 2004.

If you have any questions pertaining to this matter, I can be reached at (630) 971-6108.

Thank you for giving this matter your attention.

Sincerely,

Michael D. Rolnik
SVP Risk Management

Exhibit D



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

License No. SDT-009

LICENSE

TERRORISM SANCTIONS REGULATIONS

(Granted under the authority of Section 203 of the U.S. International Emergency Economic Powers Act (50 U.S.C. § 1702), Executive Order 12947, Antiterrorism and Effective Death Penalty Act of 1996, Pub. L. 104-132, 110 Stat. 1214-1319 (8 U.S.C. § 1189), and 31 C.F.R. Parts 501 and 595.)

To: Muhammad A. Salah
c/o: Matthew J. Piers, Esq.
Gessler, Hughes & Socol, Ltd.
Three First National Plaza, 70 West Madison Street, Suite 2200
Chicago, IL 60602-4205

1. Based on the August 12, 1998 application of Matthew J. Piers, Esq. (the "Application") and information otherwise available to the Office of Foreign Assets Control regarding the subject thereof, the transactions and activities delineated on the reverse hereof and the page attached hereto are hereby authorized.
2. This license is granted upon the statements and representations made in the Application, or otherwise filed with or made to the Treasury Department as a supplement to the Application, and is subject to the condition, among others, that the licensee(s) will comply in all respects with all regulations, rulings, orders and instructions issued by the Secretary of the Treasury under the authority of Section 203 of the International Emergency Economic Powers Act (50 U.S.C. § 1702), and the terms of this License.
3. The licensee(s) hereunder shall furnish and make available for inspection any relevant information, records or reports requested by the Secretary of the Treasury, or any other duly authorized officer or agency.
4. This license is not transferable, is subject to the provisions of Parts 501 and 595 of Title 31 of the Code of Federal Regulations and any regulations and rulings issued pursuant thereto, and may be revoked or modified at any time in the discretion of the Secretary of the Treasury. If this license was issued as a result of willful misrepresentation on the part of the applicant or his duly authorized agent, it may, in the discretion of the Secretary of the Treasury, be declared void from the date of its issuance, or from any other date.
5. This license does not excuse compliance with any law or regulation administered by the Office of Foreign Assets Control or another agency (including reporting requirements) applicable to the transaction(s) herein licensed, nor does it release licensee(s) or third parties from civil or criminal liability for violation of any law or regulation.

Issued by direction and on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

By Loren L. Hohm (Acting for
for R. Richard Newcomb R. Richard Newcomb
Director on 8/31/98)

Attention is directed to 18 U.S.C. section 1001 and 50 U.S.C. section 1705, and 31 C.F.R. Part 595 for provisions relating to penalties.

License No. SDT - 009

page 2 of 3

SECTION 1 - AUTHORIZATION: This license hereby authorizes:

- (a) U.S. persons to provide medical services to Mr. Muhammad A. Salah;
- (b) the establishment and operation of a blocked account, (the "Blocked Medical Account") on the books of the law firm of Gessler, Hughes & Socol, Ltd. (the "Firm") for the purpose of collecting and holding funds to provide for payment of medical services provided to Mr. Muhammad A. Salah and expenses directly related to the provision of such services;
- (c) transfers to the Blocked Medical Account of contributions from individuals and entities and all related transactions including collection and consolidation of funds from others for ultimate transfer to the Blocked Medical Account; however, no debit is authorized from any other blocked account, and no contributions may be accepted from any specially designated terrorist, designated pursuant to Executive Order 12947 or 31 C.F.R. Part 595, or foreign terrorist organization designated pursuant to section 302 or 303 of the Antiterrorism and Effective Death Penalty Act of 1996, Pub. L. 104-132, 110 Stat. 1214-1319 (8 U.S.C. § 1189), or 31 C.F.R. Part 597.
- (d) debits to the Blocked Medical Account, at the instruction of Mr. Salah, for payments to medical service providers of fees and expenses for medical services provided to Mr. Salah, in amounts corresponding to invoices for medical services rendered or to be rendered by medical service providers, upon the presentation of such invoices and written consent or authorization therefor from Mr. Mohammad A. Salah.

SECTION 2 - WARNING: Except as described above, nothing in this license authorizes transactions and activities that are prohibited by Executive Order 12947 and 31 C.F.R. Part 595.

SECTION 3 - REPORTING REQUIREMENTS: (a) It is a condition of this license that the Firm notify the Office of Foreign Assets Control of the establishment of the Blocked Medical Account prior to effectuating any debit to the Blocked Medical Account. Such information shall be submitted to the Office of Foreign Assets Control within 10 days of the establishment of the Blocked Medical Account, shall confirm the Firm's establishment of the Blocked Medical Account, provide relevant information regarding the Blocked Medical Account's beneficial ownership, and the name, telephone and facsimile numbers of a person at the Firm who may be contacted regarding the Blocked Medical Account, and identify the bank at which the balance of the Blocked Medical Account is indirectly held.

(b) It is a further condition of this license that the Firm file monthly reports with the Office of Foreign Assets Control consisting of copies of the Firm's accounting records pertaining to the Blocked Medical Account for the month for which a report is being filed, a copy of the bank statement from the bank at which the balance of the Blocked Medical Account is held by the Firm, along with a description of all withdrawals or debits to the Blocked Medical Account, and the identity of the person or entity to whom withdrawn or debited amounts have been

License No. SDT-009

page 3 of 3

paid. With respect to funds transfers and check deposits originating from outside the United States, the report shall include: (i) front and back copies of each check deposited into the Blocked Medical Account; (ii) copies of transfer instructions evidencing all incoming wire transfers to the Blocked Medical Account; and (iii) copies of receipts issued by the Firm (or a bank) for all other deposits or credits to the Blocked Medical Account.

The first monthly report required under this license is to be received by the Office of Foreign Assets Control no later than the close of business on October 31, 1998. Thereafter, reports are to be received no later than 30 days after the month for which they are being filed. All disclosures and reports due hereunder are to be delivered to: Compliance Programs Division, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, N.W., Treasury Annex, Washington, D.C. 20220, facsimile no.: 202/622-1657, and are to reference this license number.

SECTION 4 - RECORDKEEPING REQUIREMENTS: It is a condition of this license that Mr. Salah and the Firm keep full and accurate records of each transaction effected pursuant to this license and that such records be available for examination for 5 years from the date of a relevant transaction.

SECTION 5 - PRECEDENCE: This license is issued on a nonprecedential basis.

Exhibit E



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

CASE No. SDT-110

Mary M. Rowland, Esq.
Hughes Socol Piers Resnick & Dym Ltd.
3 First National Plaza
70 W Madison St., Suite 4000
Chicago, IL 60602

Dear Ms. Rowland:

In response to your July 9, 2009 letter to the Office of Foreign Assets Control, on behalf of Mohammad Abd El-Hamid Khalil Salah a.k.a. Muhammad A. Salah, attached please find License No. SDT-110, authorizing Mohammad Abd El-Hamid Khalil Salah a.k.a. Muhammad A. Salah (the "Licensee"), designated a Specially Designated Terrorist pursuant to Executive Order 12947 of January 23, 1995, "Prohibiting Transactions With Terrorists Who Threaten To Disrupt the Middle East Peace Process," and the Terrorism Sanctions Regulations, 31 C.F.R. Part 595, to engage in transactions necessary for personal maintenance. Please note that this License grants only limited authority to engage in transactions necessary for basic maintenance through November 30, 2009. OFAC will consider amending this License to include certain specific authorizations upon receipt of a written application describing in detail the transactions for which authorization is sought, including, without limitation, names and addresses of any employer, landlords or mortgage holders, and insurers, as well as the make, model and VIN numbers of vehicles.

Sincerely,

Jodi L. Kouts
Assistant Director for Licensing
Office of Foreign Assets Control

9/22/09
Date

Enclosure



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

LICENSE No. SDT-110

TERRORISM SANCTIONS REGULATIONS

(Granted under the authority of the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 *et seq.*), the National Emergencies Act (50 U.S.C. § 1601 *et seq.*), 22 U.S.C. § 287c, Executive Order 12947, and 31 C.F.R. Parts 501 and 595.)

To: **Muhammad A. Salah**
c/o Hughes Socol Piers Resnick & Dym Ltd.
3 First National Plaza
70 W Madison St., Suite 4000
Chicago, IL 60602
Attn: Mary M. Rowland, Esq.

1. Based on the July 9, 2009 correspondence, on behalf of Mohammad Abd El-Hamid Khalil Salah a.k.a. Muhammad A. Salah, to the Office of Foreign Assets Control (the "Application") and information otherwise available to the Office of Foreign Assets Control, License No. SDT-005 is hereby revoked, and in its place the transactions and activities delineated herein are hereby authorized.

2. This License is granted upon the statements and representations made in the Application, or otherwise filed with or made to the Treasury Department as a supplement to the Application, or based on information available to the Treasury Department, and is subject to the condition, among others, that the Licensees comply in all respects with all regulations, rulings, orders and instructions issued by the Secretary of the Treasury under the authority of the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 *et seq.*), the National Emergencies Act (50 U.S.C. §§ 1601 *et seq.*), section 5 of the United Nations Participation Act of 1945, as amended (22 U.S.C. § 287c), section 301 of title 3 of the United States Code, Executive Order 12947 of January 23, 1995, and the terms of this License.

3. The Licensee shall furnish and make available for inspection any relevant information, records, or reports requested by the Secretary of the Treasury, or any other duly authorized officer or agency.

4. This License **expires on November 30, 2009**, is not transferable, and is subject to the provisions of Executive Order 12947 of January 23, 1995, 31 C.F.R. Parts 501 and 595, and any regulations and rulings issued pursuant thereto. This License may be revoked or modified at any time at the discretion of the Secretary of the Treasury. If this License was issued as a result of willful misrepresentation, it may, at the discretion of the Secretary of the Treasury, be declared void from the date of its issuance or from any other date.

5. This License does not excuse compliance with any law or regulation administered by the Office of Foreign Assets Control or another agency (including reporting requirements) applicable to the transactions herein licensed, nor does it release the Licensees or third parties from civil or criminal liability for violation of any law or regulation.

Issued on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

By Jodi L. Kouts 9/22/09
Jodi L. Kouts Date
Assistant Director for Licensing

Attention is directed to 18 U.S.C. § 1001, 50 U.S.C. § 1705, 18 U.S.C. § 2339B, and 31 C.F.R. §§ 594.701, 595.701, and 597.701 for provisions relating to penalties.

SECTION I – AUTHORIZATION: (a) Subject to the terms and conditions stated herein, Mohammad Abd El-Hamid Khalil Salah a.k.a. Muhammad A. Salah (the “Licensee”) is hereby authorized to engage in all transactions reasonably necessary to:

- (1) purchase, make payment for, and receive goods and services essential to the basic maintenance of the Licensee, including rent, food, clothing, medical care, transportation, insurance and utilities;
- (2) make payments pursuant to License No. SDT-77, as amended;
- (3) seek employment; and
- (4) establish and maintain an account with a U.S. financial institution, as described in the Application, for the sole purpose of carrying out the transactions authorized in Section I (a) (1) and I (a) (2) (the “Account”).

(b) Any transfers of funds through the U.S. financial system pursuant to the authorization set forth above should reference the number of this License to avoid the blocking or rejection of the transfer.

SECTION II – CONDITIONS: (a) Payments of expenses authorized by this License must not originate from a source within the United States, or from any source outside the United States within the possession or control of a U.S. person other than the Licensee, or from any entity or individual, other than the Licensee, whose property or interests in property are blocked pursuant to any Executive order or Chapter V of Title 31 of the C.F.R.

(b) It is a condition of this License that the Licensee notify the Office of Foreign Assets Control (“OFAC”) of the establishment of the Account prior to effectuating any debit to the Account (see Section IV (b) below).

SECTION III – WARNING: (a) Except as expressly authorized by the terms of this License, nothing in this License authorizes any transaction prohibited by the Terrorism Sanctions Regulations, 31 C.F.R. Part 595, by any other laws or regulations administered by the Office of Foreign Assets Control or with other applicable provisions of law.

(b) Except as expressly authorized by the terms of this License, nothing in this License authorizes the transfer of any blocked property, the crediting or debiting of any blocked account, the entry of any judgment or order that effects a transfer of blocked property, or the execution of any judgment against property which is blocked pursuant to any Executive Order or Chapter V of Title 31 of the C.F.R., including the Terrorism Sanctions Regulations.

(c) Except as expressly authorized by the terms of this License, or otherwise by the OFAC, nothing in this License authorizes the transfer to or receipt of funds or other property, directly or indirectly, from any entity or individual whose property or interests in property are blocked pursuant to any Executive Order or Chapter V of Title 31 of the C.F.R.

(d) Nothing in this License authorizes the provision of funding other than for the purposes delineated in Section I (a).

(e) Nothing in this License authorizes the financing of any transactions authorized in Section I (a).

SECTION IV – RECORDKEEPING AND REPORTING REQUIREMENTS: The Licensee is subject to the recordkeeping and reporting requirements of, *inter alia*, 31 C.F.R. §§ 501.601 and 501.602, including the requirement to maintain full and accurate records concerning the transactions undertaken

pursuant to this License for a period of five years from the date of each transaction. Such records shall clearly demonstrate the applicability of the authorization set forth in Section I (a) hereof.

(b) Within 10 business days from the establishment of the Account described in Section I (a), above, the Licensee must provide to OFAC the name and address of the financial institution, the name of the account holder, and the account number. Reports are to be mailed to: Designations Investigations Division, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, NW, Washington, DC, 20220. Failure to provide the required report is subject to the penalties referenced in 31 C.F.R. § 595.701.

(c) Within 10 business days of garnering employment described in Section I (a), above, the Licensee must provide to OFAC the name and address of the employer, a description of his employment position, proof of direct deposit to the Account, and include copies of all documentation regarding his net pay or compensation from all sources in connection with his employment, including copies of all pay stubs and checks received in connection therewith. Reports are to be mailed to: Designations Investigations Division, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, NW, Washington, DC, 20220. Failure to provide the required report is subject to the penalties referenced in 31 C.F.R. § 595.701.

(d) The Licensee shall submit a report no later than December 31, 2009, providing information on the funds received pursuant to this License. Such report shall specify the source and amount of funds received. In the event that no transactions occur or no funds are received during the reporting period, a statement is to be filed to that effect. The report is to be mailed to: Licensing Division, Office of Foreign Assets Control, U.S. Department of the Treasury, 1500 Pennsylvania Avenue, N.W., Annex, Washington, D.C. 20220, and is to refer to this License No. SDT-110. Failure to provide the required report is subject to the penalties referenced in 31 C.F.R. § 595.701.

SECTION V – PRECEDENTIAL EFFECT: The authorization contained in this License is limited to the facts and circumstances specific to the Application.
