

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

Fethullah Gulen,	:	
	:	
Plaintiff	:	
	:	
v.	:	Civil No. 07-cv-2148
	:	
Michael CHERTOFF, et. al.,	:	
	:	
Defendants	:	

JOINT STIPULATION OF FACTS

Plaintiff Fethullah Gulen, through his attorneys H. Ronald Klasko and Theodore J. Murphy, and Defendants, Michael Chertoff, et al., through their attorneys Patrick L. Meehan, United States Attorney, and Mary Catherine Frye, Assistant U. S. Attorney, hereby agree and stipulate to the following facts:

1. On or about November 21, 2006, Plaintiff completed and filed Form I-140, Immigrant Visa Petition, seeking classification as an alien of extraordinary ability, under 8 U.S.C. § 1153(b)(1)(A), with the USCIS Texas Service Center premium processing unit, including a premium processing fee (I-907) of \$1,000. (*Administrative Record ("A.R.") pp. 243 – 245 (I-140 Immigrant Petition for Alien Worker) and p. 242 (I-907 request for Premium Processing Service).*)

2. On or about November 22, 2006, the USCIS Texas Service Center premium processing unit issued to Plaintiff Gulen Form I-797C indicating receipt of Plaintiff's Form I-140 and the \$1,000 premium processing fee. The case identification number is SRC-07-035-53075. Filing a petition with the premium processing unit guarantees a decision on the

petition within 15 calendar days. “A petitioner or applicant requesting Premium Processing Service shall submit form I-907 with the appropriate fee to the Director of the service center having jurisdiction over the application or petition. Premium Processing Service guarantees 15 calendar day processing of certain employment-based petitions and applications.” See 8 C.F.R. § 103.2(f)(1).

3. On or about December 14, 2006, pursuant to 8 C.F.R. § 103.2(f), Plaintiff requested a refund of the \$1,000 premium process fee, based on Defendant Upchurch’s failure to process or adjudicate Plaintiff’s Form I-140 with 15 calendar days.

4. To date, USCIS has not returned or refunded Plaintiff’s payment of the \$1,000 premium processing fee.

5. On August 13, 2007, the Vermont Service Center issued a request for evidence on Plaintiff Gulen’s I-140 Petition. Mr. Gulen was given a response deadline of November 8, 2007. (*A.R. pp. 139 – 142, pp. 236 – 239*).

6. On October 4, 2007, Plaintiff Gulen responded to the August 13, 2007 request for evidence by filing the requested evidence with Vermont Service Center. (*A.R. pp. 143 – 161*)(*cover letter*).

7. On November 19, 2007, after the filing of the Complaint, the Vermont Service Center denied Plaintiff’s I-140 Extraordinary Ability Petition.

8. On December 18, 2007, Plaintiff filed, with the Vermont Service Center, his appeal of the denial of the I-140 Petition to the USCIS AAO. (*A.R. pp. 135 – 138*) (*Notice of Appeal*);(*A.R. p. 28*) (*Receipt Notice*).

9. On December 21, 2007, this Court ordered USCIS AAO to adjudicate Plaintiff's I-140 petition within 120 days.

10. On January 10, 2008, a Form 797, Transfer Notice, was received, indicating the appeal of the I-140 decision had been forwarded from the Vermont Service Center to the USCIS AAO in Washington, DC.

11. On January 15, 2008, Plaintiff submitted a brief in support of his appeal of the denial of the I-140. (*A.R. pp 16-27*).

12. On March 7, 2008, the AAO denied Plaintiff's I-140 Extraordinary Ability petition. (*A.R. pp. 1 – 15*).

13. Plaintiff filed numerous exhibits with his original petition and the subsequent response to the request for additional evidence by USCIS.

14. A letter in support of Mr. Gulen's I-140 petition was submitted by George Washington University, Department of International Affairs, signed by Adjunct Professor George Fidas, M.A.. Mr. Fidas formerly served as Director for Outreach of Central Intelligence for Analysis and Production at the Central Intelligence Agency (CIA) and currently sits on the faculty of the Joint Military Intelligence Council. The letter was included with the original submission and contained the title, professional affiliation(s), and curriculum vitae of the referee. (*A.R. pp. 1085 – 1092*).

15. A letter in support of Mr. Gulen's I-140 petition was submitted by the Greek Orthodox Archdiocese of America, signed by Protopresbyter of the Ecumenical Patriarchate, Father Alexander Karloutsos. The letter was included with the original submission and

contained the title, professional affiliation(s), and curriculum vitae of the referee. (*A.R. pp. 1093 – 1095*).

16. A letter in support of Mr. Gulen's I-140 petition was submitted by Morton Abramowitz, United States Ambassador to the Republic of Turkey (ret.), former President of the Carnegie Endowment for International Peace, and current Senior Fellow at The Century Foundation. The letter was included with the original submission and contained the title, professional affiliation(s), and curriculum vitae of the referee. (*A.R. pp. 1082 – 1084*).

17. A letter in support of Mr. Gulen's I-140 petition was submitted by Chief Advisor of the Former President of Turkey (Turgut Özal), signed by Ermin Baser. Mr. Baser also formerly served as Professor at Kayseri University (Turkey) and as a member of the Executive Committee of the Scientific and Technical Research Council of Turkey. The letter was included with the original submission and contained the title, professional affiliation(s), and curriculum vitae of the referee. (*A.R. pp. 1096 – 1099*).

18. A letter in support of Mr. Gulen's I-140 petition was submitted by the former Vice-Chairman of the National Intelligence Council, Central Intelligence Agency (CIA) and current Senior Political Consultant at the RAND Corporation, Graham Fuller, M.A. The letter was included with the original submission and contained the title, professional affiliation(s), and curriculum vitae of the referee. (*A.R. pp. 1100 – 1103*).

19. A letter in support of Mr. Gulen's I-140 petition was submitted by Georgetown University, Department of Islamic History, signed by Associate Director of the Center for Muslim-Christian Understanding, John Obert Voll, Ph.D. The letter was included with the

original submission and contained the title, professional affiliation(s), and curriculum vitae of the referee. *(A.R. pp. 1104 – 1106)*.

20. A letter in support of Mr. Gulen's I-140 petition was submitted by Dartmouth College, Department of Anthropology, signed by Ralph and Richard Lazarus Professor of Anthropology and Human Relations, Dale F. Eickelman, M.A.. The letter was included with the original submission and contained the title, professional affiliation(s), and curriculum vitae of the referee. *(A.R. 1107 – 1127)*.

21. A letter in support of Mr. Gulen's I-140 petition was submitted by former Prime Minister of the Republic of Turkey, Mr. Yildirim Akbulut. The letter was included with the original submission and contained the title, professional affiliation(s), and curriculum vitae of the referee. *(A.R. pp. 1128 – 1130)*.

22. A letter in support of Mr. Gulen's I-140 petition was submitted by former President of the Council of Higher Education of the Republic of Turkey and current Director of the Ethics Institute for Public Officers, Mehmet Saglam, Ph.D. The letter was included with the original submission and contained the title, professional affiliation(s), and curriculum vitae of the referee. *(A.R. pp. 1131 – 1134)*.

23. A letter in support of Mr. Gulen's I-140 petition was submitted by the University of Texas at San Antonio, Department of English, Classics, and Philosophy, signed by Department Chair and Associate Professor, Bernadette Andrea, Ph.D. The letter was included with the original submission and contained the title, professional affiliation(s), and curriculum vitae of the referee. *(A.R. pp. 1135 – 1150)*.

24. A letter in support of Mr. Gulen's I-140 petition was submitted by Elmhurst College, Department of Theology and Religion, signed by Baltzer Distinguished Chair of Theology and Religion, Paul P. Parker, Ph.D. The letter was included with the original submission and contained the title, professional affiliation(s), and curriculum vitae of the referee. (*A.R. pp. 1151 – 1161*).

25. A letter in support of Mr. Gulen's I-140 petition was submitted by the Evangelical Lutheran Church in America - Arkansas-Oklahoma Synod, signed by Bishop Floyd M. Schoenhals. The letter was included with the original submission. (*A.R. p. 1162*).

26. A letter in support of Mr. Gulen's I-140 petition was submitted by the European Confederation of Young Entrepreneurs, signed by President, Murat Sarayli. The letter was included with the original submission and contained the title, professional affiliation(s), and curriculum vitae of the referee. (*A.R. pp. 1163 – 1165*).

27. The RFE acknowledges receipt of "thirteen letters of support attesting to the significance of [Mr. Gülen's] accomplishments," which "describe [him] as one of the elite few at the very top of the field." (*A.R. p. 141*).

28. A letter in support of Mr. Gulen's I-140 petition was submitted by Father Thomas Michel, S.J., Secretary of the Jesuit Secretariat for Interreligious Dialogue of the Society of Jesus (the Jesuits), a religious order of the Roman Catholic Church. Father Michel was present at the Vatican meeting between Mr. Gülen and His Holiness Pope John Paul II. (*A.R. p. 174*).

29. A letter in support of Mr. Gulen's I-140 petition was submitted by the Catholic Theological Union, signed by President and Appointee of the Vatican's Pontifical Biblical Commission, Father Donald Senior, C.P. (*A.R. pp. 175 – 177*).

30. A letter in support of Mr. Gulen's I-140 petition was submitted by the Lutheran School of Theology at Chicago, signed by President, James Kenneth Echols, Ph.D., and Director of the Center of Christian-Muslim Engagement for Peace and Justice, Reverend Michael T. Shelley, Ph.D. (*A.R. p. 178*).

31. A letter in support of Mr. Gulen's I-140 petition was submitted by Rice University's Boniuk Center for the Study and Advancement of Religious Tolerance, signed by executive Director, Jill Carroll, Ph.D. (*A.R. p. 179*).

32. Two letters in support of Mr. Gulen's I-140 petition were submitted by the University of Houston, signed by Director of Religious Studies and Resident Scholar in Religion, Lynn E. Mitchell, Ph.D. (*A.R. pp. 33 – 34, pp. 180 – 181*).

33. A letter in support of Mr. Gulen's I-140 petition was submitted by Texas Tech University, signed by Dean and Professor, College of Education, Sheryl L. Santos, Ph.D. (*A.R. p. 182*).

34. Two letters in support of Mr. Gulen's I-140 petition were submitted by Houston Baptist University, signed by Professor and Chair, Department of Christianity and Philosophy, David B. Capes, Ph.D. (*A.R. pp. 35 – 36, pp. 183 – 184*).

35. A letter in support of Mr. Gulen's I-140 petition was submitted by the University of California, Riverside, signed by Minister, United Campus Ministry, Reverend Terry Mathis, Ph.D. (*A.R. pp. 185 – 186*).

36. A letter in support of Mr. Gulen's I-140 petition was submitted by Millsaps College, signed by Chair and Associate Professor of Religious Studies, James E. Bowley, Ph.D. (*A.R. p. 187*).

37. A letter in support of Mr. Gulen's I-140 petition was submitted by Tougaloo College, signed by Director of the Religious Studies Program, Reverend Loye Ashton, Ph.D. (*A.R. pp. 188 – 189*).

38. A letter in support of Mr. Gulen's I-140 petition was submitted by La Sierra University, signed by President Emeritus, Lawrence T. Geraty, Ph.D. (*A.R. pp. 190 – 191*).

39. A letter in support of Mr. Gulen's I-140 petition was submitted by the Rumi Forum, a non-profit organization signed by President, Dr. H. Ali Yertsever. (*A.R. pp. 192 – 195*).

40. A letter in support of Mr. Gulen's I-140 petition was submitted by the Niagara Foundation, a non-profit organization in Chicago signed by Executive Director, Kemal Oksuz. (*A.R. pp. 196 – 202*).

41. A letter describing the connection between the occupation of clergyman and the field of education was submitted by John L. Esposito, Professor and Founding Director of the Georgetown University, Edmund A. Walsh School of Foreign Service, Prince Alwaleed Bin Talal Center for Muslim-Christian Understanding. (*A.R. pp. 31 – 32*).

42. A letter describing the role of clergy as educators and the science of theology was submitted by John Borelli, Ph.D., Special Assistant to the President for Interreligious Initiatives at Georgetown University. (*A.R. p. 37*).

43. Plaintiff's filings with USCIS also included correspondence addressed to Mr. Gülen, since he has resided in the United States, from other institutions, organizations, and religious denominations. This correspondence includes letters from the Secretariat of the Vatican (*A.R. p. 203*), the Pontifical Council for Interreligious Dialogue at the Vatican (*A.R. p. 205*), the Office of John Cardinal O'Connor (*A.R. p. 204*), Harvard University (*A.R. pp. 206 – 207*), Catholic University of America (*A.R. p. 208*), the Hartford Seminary (*A.R. pp. 209-210*), the Institute on Religion and Public Policy (*A.R. p. 211*), the Parliament of the World's Religions (*A.R. pp. 212 – 217*), the American Sephardi Foundation (*A.R. p. 218*), the Museum of World Religions (*A.R. pp. 219 – 220*), the University of Oklahoma (*A.R. p. 221*), the University of St. Thomas (*A.R. pp. 222 – 223*), and the Archbishop Iakovos Leadership 100 Endowment Fund (*A.R. pp. 224 – 225*).

44. Mr. Gülen met with Pope John Paul II on February 9, 1998. (*A.R. pp. 90 – 105, pp. 248 – 265*).

45. Mr. Gülen has also collaborated with other religious figures. (*A.R. pp. 1173 – 1182*).

46. Courses in which Mr. Gülen's work is taught include "Comparative Religious Ethics" at the Hartford Seminary (*A.R. pp. 266 – 272*), "Islam and Modernity" and "Social Movements and Activism in the Middle East" at Connecticut College (*A.R. pp. 273 – 276, pp. 288 – 294*), "Clash of Civilizations" at the University of Houston (*A.R. pp. 277 – 280*), "Islamic Mysticism" at Loyola University Chicago (*A.R. pp. 281 – 287*), "Comparative

Politics of the Middle East” at the University of Utah (*A.R. pp. 295 – 299*), “Comparative Islamic Literature” at the University of Georgia (*A.R. pp. 300 -304*), “Political Culture” at Northern Illinois University (*A.R. pp. 305-317*), “Modern Central Asia: An Introduction” at Johns Hopkins University (*A.R. pp. 318 – 321*), and “Life of the Prophet” at Georgia State University (*A.R. pp. 322 – 325*).

47. Mr. Gülen’s work is also part of the curricula such as “Religion and Nationalism in Southeast Europe” at the Center for Interdisciplinary Postgraduate Studies at the University of Sarajevo (Bosnia) (*A.R. pp. 331 – 336*), “Islam: Formative Period, the Qur’an, Neofundamentalism and Tolerance” at Ateneo de Manila University (Philippines) (*A.R. pp. 337 – 339*), and “Radical Politics in the Middle East” at the Middle East Technical University (Turkey) (*A.R. pp. 326 – 330*), to name only a few.

48. Mr. Gülen is the founder of the “Gülen Movement.”

49. The principles of the Gülen Movement are the foundation for hundreds of schools established in North America, Europe, and Asia.

50. The Gülen schools have received media coverage, in sources such as The Economist, which published an article in its July 8, 2000 issue. (*A.R. p. 340*).

51. Mr. Gülen has published over 40 books and nearly 100 articles. (*A.R. pp. 1467 - 1470*).

52. Mr. Gülen’s books include Toward a Global Civilization of Love and Tolerance (*A.R. pp. 1184 – 1188, p. 1623*), Advocate of Dialogue (*A.R. pp. 1228 – 12 40, p. 1627*), The Necessity of Interfaith Dialogue: A Muslim Perspective (Windows Onto the Faith) (*A.R. pp.*

1208 – 1210), Pearls of Wisdom (A.R. pp. 1044 – 1051, p. 1614), Emerald Hills of the Heart (A.R. pp. 1222 – 1227, pp. 1514 – 1518), The Infinite Light vol. 1-2, Towards the Lost Paradise, and Truth Through Colors, Life After Death (Windows Onto the Faith), Islam and Democracy (Windows Onto the Faith) (A.R. pp. 1211 – 1213), M. Fethullah Gülen: Essays, Perspectives, Opinions (A.R. p. 1616 – cover), The Statue of Our Souls: Revival in Islamic Thought and Activism (A.R. p. 1619 – cover), Resurrection and the Afterlife, Questions: This Modern Age Puts to Islam, The Essentials of Islamic Faith (A.R. pp. 1194 – 1202), and Key Concepts in the Practice of Sufism (A.R. pp. 1214 – 1221), An Analysis of the Prophet's Life (A.R. p. 1612 – cover),. Mr. Gülen also authored the forward of the Fundamentals Of Rumi's Thought: A Mevlevi Sufi Perspective. Mr. Gülen's books are available in English, Arabic, German, Russian, Japanese, and Spanish and Arabic. Three boxes of books were submitted in support of the petition to USCIS.

53. Plaintiff's response to the RFE includes a Sales Report from Kaynak Publishing Group, dated September 19, 2007, listing sales of Mr. Gülen's Books Editions from January 1, 2006 to August 31, 2007. (A.R. pp. 343 – 346).

54. Plaintiff's response to the RFE includes an Online Publishing Report from Kaynak Publishing Group. (A.R. p. 347).

55. Plaintiff's response to the RFE includes Amazon Rankings. According to Amazon.com rankings of Bestsellers, the book A Dialogue of Civilizations: Gülen's Islamic Ideals and Humanistic Discourse was in the Religion & Spirituality category. (A.R. p. 348)

56. Mr. Gülen has also published over 100 articles in journals and periodicals, including the Johns Hopkins University School of Advanced International Studies Review of Foreign

Policy and Affairs (SAIS Review). In this journal, Mr. Gülen published his article entitled “*A Comparative Approach to Islam and Democracy*.”

57. There are conferences devoted to the study of Mr. Gülen’s life. For instance, the *International Conference: Muslim World in Transition – Contributions of the Gülen Movement* was held in London, October 25 – 27, 2007. This conference was organized by the British government (*House of Lords*), the University of London, the University of Birmingham, the Irish School of Ecumenics, and the London Middle East Institute, and Leeds Metropolitan University. Topics at the conference included, Mr. Gülen’s “*global contributions to peace building*,” “*re-thinking of Islamic patterns and its socio-political effects*,” and “*promotion of human rights in the Muslim world*.” Speakers at the conference included top experts on Mr. Gülen’s work from Harvard, Georgetown, Cambridge, and Notre Dame. (*A.R. pp. 351 – 352*).

58. Another conference that was devoted to the scholarship of Mr. Gülen was *Peaceful Coexistence: Fethullah Gülen’s Initiatives For Peace In The Contemporary World*, which was sponsored by the *American Political Science Association* and hosted by Erasmus University in The Netherlands. The call for papers for this conference explained, “*By focusing on Gülen’s ideas and practice, this Conference aims to explore the appeal and impact of the Gülen movement’s worldwide initiatives to help people respond creatively to the profound social changes that are taking root everywhere*.” The major themes of this conference were “*1. Peaceful Muslim–non-Muslim co-existence in a secular context 2. Inclusiveness and integration 3. The necessity and importance of dialogue 4. The positive role of non-denominational education 5. The state of East–West, North–South relations 6.*

Reconciling and balancing reason and faith 7. *Understanding the benefits of democracy* 8. *The role of shared values in building civility and citizenship.*” (A.R. pp. 353 – 354).

59. The *2nd Annual Congressional Interfaith and Intercultural Ramadan Iftar Dinner* was held on September 19, 2007 in Washington, D.C. At this event, Christians and Jews gathered with Muslims for an interfaith *iftar* (fast-breaking meal) and other social activities. The Washington Congressional Iftar was sponsored by the Rumi Forum, for which Mr. Gülen serves as Honorary President. Attendees and speakers at this event included, Father Thomas Michel (Society of Jesus in Rome), Dr. Ekmeleddin Ihsanoglu (Secretary General of the Organization of the Islamic Conference), Rabbi Joshua O. Haberman (Rabbi Emeritus of the Washington Hebrew Congregation and Founder and Chairman of the Board of the Foundation for Jewish Studies), Archbishop Demetrios Trakatellis (Greek Orthodox Archdiocese of America), and Father Thomas Ryan, C.S.P. (Director of the Paulist North American Office for Ecumenical and Interfaith Relations in Washington, D.C.). (A.R. pp. 355 – 365).

60. Other conferences at which Mr. Gülen’s teachings were presented include: *Islamic Modernities: Fethullah Gülen and Contemporary Islam* at Georgetown University and the *International Conference on Islam in the Contemporary World: The Fethullah Gülen Movement in Thought and Practice* at Southern Methodist University in Dallas, Texas (A.R. pp. 447 – 449, pp. 1440 - 1442).

61. Mr. Gülen’s work has been presented at other meetings, including presentations such as “*Ijtihad and Tajdid by Conduct: Gülen and His Movement*” by Dr. Ihsan Yilmaz of the Oxford Centre for Islamic Studies and “*Turkish Experience for Muslim-Christian Dialogue:*

A Thinker: B. S. Nursi; An Activist: M. F. Gülen” by Father Thomas Michel, S.J. at the *Conference on Peace and Dialogue in a Plural Society: Common Values and Responsibilities*.

62. Mr. Gülen’s contributions were part of a presentation entitled “*Globalization and Diversification of Islamic Movements: Three Turkish Cases*” by Ahmet T. Kuru at the *Middle East Study Association (MESA) Meeting* in San Francisco.

63. Articles about Mr. Gülen that have been published in The New York Times (A.R. pp. 369 – 373) (Circulation: 1,120,420 Daily, 1,627,062 Sunday), The Washington Post (A.R. pp. 415 – 417) (Circulation: 699,130 Daily, 929,921 Sunday), The Economist (A.R. p. 374) (Circulation: over 1.2 million copies per week), The Dallas Morning News (A.R. pp. 377 – 378, pp. 396 – 397, pp. 402 – 403) (Circulation: 411,919 Daily, 563,079 Sunday), The National Catholic Reporter (A.R. p. 379) (Weekly readership of 120,000), the Austin American Statesman (A.R. p. 380) (Daily Circulation: 183,288, Sunday Circulation: 233,608, Tulsa World (A.R. pp. 381 – 383) (Daily Readership 239,928, Average Sunday Readership 387,179), Texas Catholic (A.R. pp. 384 – 391) (Readership: 140,000), Texas Monthly (A.R. p. 392) (Readership: 276,617), The Eagle (Texas) (A.R. pp. 404 – 405) (105,000 subscribing households), The Clarion Ledger (A.R. p. 398) (Jackson, Mississippi) (Circulation: 100,000), The Jewish Herald-Voice (A.R. p. 399) (Readership: more than 30,000), The San Antonio Express-News (A.R. pp. 400 – 401) (Circulation: 349,840 Sunday, 238,669 Daily), and The Kansas City Star (A.R. pp. 407 – 409) (Readership: 685,200 daily 888,700 Sunday).

64. Mr. Gülen has been the subject of coverage on broadcast outlets.

65. Mr. Gülen was the subject of a report on Australian Broadcasting Corporation Radio National's program "*Encounter*." The report about Mr. Gülen was broadcast on October 7, 2007. It is available at www.abc.net.au/encounter. (A.R. pp. 115 – 131).

66. A Special Issue of The Muslim World entitled Islam in Contemporary Turkey: the Contributions of Fethullah Gülen focused entirely on the contributions of Mr. Gülen. (A.R. pp. 1203 – 1207). The Special Edition of The Muslim World published about Mr. Gülen contained articles such as: "*Fethullah Gülen and the 'People of the Book': A Voice from Turkey for Interfaith Dialogue*," (A.R. pp. 1552 – 1563); "*Gülen on Religion and Science: A Theological Perspective*" (A.R. pp. 508 – 522); "*An Interview with Fethullah Gulen*" (A.R. pp. 523 – 544); "*An Islamic Approach to Peace and Nonviolence: A Turkish Experience*" (A.R. pp. 545 – 560); "*Sufism and Modernity in the Thought of Fethullah Gulen*" (A.R. pp. 561 – 578, pp. 1495 - 1512); "*Gulen's Paradox: Combining Commitment and Tolerance*" (A.R. pp. 579 – 590); "*State, Law, Civil Society and Islam in Contemporary Turkey*" (A.R. pp. 591 – 618); "*Redeemer or Outsider? The Gulen Community in the Civilizing Process*" (A.R. pp. 619 – 636).

67. The Gülen Movement is the subject of the book "*Turkish Islam and the Secular State*." (A.R. pp. 1189 – 1193, p. 1613 – cover).

68. Articles about Mr. Gülen have appeared in other editions of The Muslim World, including the article "*The Fethullah Gülen Movement and Its Politics of Representation in Turkey*," which appeared in the January 2006 issue. (A.R. pp. 488 – 507).

69. The Middle East Report published an article entitled “*Turkey Islam and National Identity*” in which the Gülen Movement is recognized for “*play[ing] [a] central part[] in the flourishing field of social Islam.*” (A.R. pp. 639 – 645).

70. Mr. Gülen’s contributions are discussed in the article “*Secularizing Trends in Fethullah Gülen’s Movement: Impasse or Opportunity for Further Renewal?*” in Critique: Critical Middle Eastern Studies (Critique) (Spring 2003 issue) (A.R. pp. 647 – 657, pp. 1372 - 1382), and also in the article “*Fethullah Gulen and His Movement’s Islamic Ethic of Education*” in Critique (Spring 2002 issue) (A.R. pp. 658 – 679). Critique is published by the academic publisher Taylor & Francis and is indexed by *Alternative Press Index, Left Index, and MLA International Bibliography and Sociological Abstracts.* (A.R. pp. 680 – 682).

71. Articles discussing Mr. Gülen have also been published in Central Asian Survey (A.R. pp. 683 – 697, pp. 699 – 718), Turkish Studies (A.R. pp. 722 – 745), Nations and Nationalism (A.R. pp. 750 – 771, p. 1371, pp. 1383 - 1402), the British Journal of Sociology (A.R. pp. 778 – 805), the Middle East Review of International Affairs (A.R. pp. 806 – 822), Religion State & Society (A.R. pp. 823 – 853, pp. 1343 - 1370), Political Science Quarterly (A.R. pp. 854 – 878), Middle East Policy (A.R. pp. 879 – 894), and the Journal of Asian and African Studies (A.R. pp. 895 – 904).

72. Recently, two reports were published that discuss Mr. Gülen’s contributions: Building Moderate Muslim Networks in the chapter entitled “*Roadmap for Moderate Network Building in the Muslim World.*” Building Moderate Muslim Networks was published this year by the RAND Center for Middle East Public Policy (CMEPP). (A.R. pp. 974 – 1010). In another RAND report entitled “*Civil Democratic Islam – Partners*

Resources and Strategies,” published by its National Security Research Division, Mr. Gülen is also recognized for “putt[ing] forward a version of Islamic modernity that is strongly influenced by Sufism and [that] stresses diversity, tolerance, and nonviolence (Gülen, 1999),” referencing his book Key Concepts in the Practice of Sufism. (A.R. pp. 957 – 973).

73. An article, “*Progressive Islamic Thought, civil society and the Gulen movement in the national context: parallels with Indonesia*,” was submitted in support of the I-140 petition written by Greg Barton. Greg Barton is an Associate Professor in politics at Deakin University where he teaches Political Leadership, Global Islamic Politics, and Society and Culture in Contemporary Asia. (A.R. pp. 905 – 955).

74. While in the United States, Mr. Gülen founded the *Institute for Interfaith Dialog* (Houston, Texas). The *Institute of Interfaith Dialog (IID)* is a non-profit organization. (A.R. pp. 1029 – 1033).

75. While in the United States, Mr. Gülen has served as Honorary President of the *Niagara Foundation* (Chicago, Illinois). (A.R. pp. 1023 – 1028).

76. While in the United States, Mr. Gülen has served as the Honorary President of the *Rumi Foundation* (Cleveland, Ohio). (A.R. pp. 1020 - 1022).

77. While in Turkey, Mr. Gülen founded *The Gülen Movement*. In his position as the Founder and Head of The Gülen Movement, Mr. Gülen has overseen the establishment of a conglomeration of schools throughout the world, in Europe, Central Asia, and the United States. (A.R. pp. 658 – 679, pp. 1343 – 1370, pp. 1518 – 1546).

78. While in Turkey, Mr. Gülen founded the *Journalists and Writers Foundation* (Turkey).

79. Mr. Gülen is the recipient of several honors.

80. Mr. Gülen is the recipient of the *Award for Contribution to Tolerance and Dialogue*, the *United Nations Educational, Scientific and Cultural Organization (UNESCO)*. Mr. Gülen received this award from for his “Contribution to Tolerance and Dialogue” and was presented with the award by the *Danube Foundation*. (*A.R. pp. 43 – 44, pp. 162 – 167, pp. 1036 – 1040*).

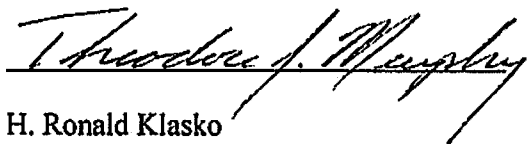
81. Mr. Gülen is an *Honoree of The Peaceful Heroes Symposium*. Mr. Gülen was honored at the University of Texas at Austin, alongside a list of contemporary peacemakers included in a list spanning over 5,000 years of human history. (*A.R. pp. 1041 - 1043*).

82. Mr. Gülen is an *Honoree of The Peace Heroes Award*. Mr. Gülen was designated as a “Peace Hero” by religious leaders in Leeds, United Kingdom. As an honoree, Mr. Gülen joined the company of the Dalai Lama (Buddhist Spiritual Leader), Yitzhak Rabin (Jewish Nobel Peace Laureate), and King Ashok (Hindu Man of Wisdom). (*A.R. p. 1047*).

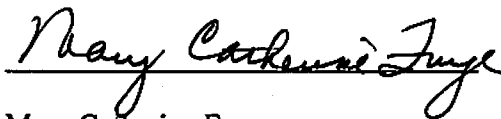
83. Mr. Gülen is the recipient of the *Intersociety Adaptation and Contribution to Peace Award*, the *Kyrgyzstan Spirituality Foundation*. At a ceremony in Bishkek, the capital of the Central Asian republic Kyrgyzstan, Mr. Gülen was honored for his contributions to world peace. Mr. Gülen was described as a man of science, service, and great thought in the ceremony at which the award was bestowed upon him. (*A.R. pp. 1048 – 1051, n.39*).

For the Plaintiff:

For the Defendants



H. Ronald Klasko
Theodore J. Murphy



Mary Catherine Frye
Assistant U. S. Attorney

Approved by the Court:

Stewart Dalzell
United States District Judge

Dated: