

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

EL-SHIFA PHARMACEUTICAL)	
INDUSTRIES COMPANY, and)	
SALAH EL DIN AHMED MOHAMMED IDRIS,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 1:01CV00731 (RWR)
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	

SUPPLEMENTAL COMPLAINT

Plaintiffs El-Shifa Pharmaceutical Industries Company and Salah El-Din Mohammed Ahmed Idris hereby supplement their complaint filed on April 4, 2001 as follows:

1. In May 1998, President Clinton appointed Richard A. Clarke as the National Coordinator for Security, Infrastructure Protection, and Counter-Terrorism.
2. In this capacity, one of Mr. Clarke’s primary responsibilities was to review and evaluate intelligence about terrorism. Consequently, as Mr. Clarke disclosed in his recent book *Against All Enemies*, he frequently reviewed and evaluated intelligence concerning Osama bin Laden and the al Qaeda terrorist network.
3. As Mr. Clarke also disclosed in his book, he was involved in the decision to retaliate against al Qaeda for the bombing of the United States embassies in Kenya and Tanzania, including the decision to destroy the El-Shifa plant.
4. As a result of his position and his involvement in the decision to attack the El-Shifa plant, Mr. Clarke would have known of any intelligence suggesting that Mr. Idris was associated with Osama bin Laden or any terrorist activities.

5. Mr. Clarke is unaware of any reason to believe that Salah Idris ever supported Osama bin Laden or any terrorist organization. Accordingly, in the most recent edition of his book *Against All Enemies*, Mr. Clarke wrote that “[t]he intelligence I had seen never implicated Mr. Idris in any investment by the Sudan Military Industry Commission nor in any involvement with Osama bin Laden nor any terrorist activities.”

6. Upon information and belief, the U.S. officials who told reporters that Mr. Idris had business dealings with terrorists and acted as a “front man” for bin Laden did not possess any intelligence about Salah Idris that was unknown to Mr. Clarke.

Dated: January 11, 2005

Respectfully submitted,

/s/

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