

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

BENEVOLENCE INTERNATIONAL FOUNDATION, INC.)	
)	
Plaintiffs,)	
)	
v.)	No. 02 C 0763
)	
JOHN ASHCROFT, in his official capacity as Attorney General of the United States of America; PAUL H. O'NEILL, in his official capacity as Secretary of the Treasury of the United States of America; COLIN L. POWELL, in his official capacity as Secretary of State of the United States of America; ROBERT S. MUELLER, III, in his official capacity as Director, Federal Bureau of Investigation; and R.RICHARD NEWCOMB, in his official capacity as Director, United States Department of Treasury, Office of Foreign Assets Control,)	Judge James H. Alesia
)	Magistrate Judge Michael T. Mason
)	
)	No. 02 C 0674
)	
Defendants.)	Judge Wayne R. Andersen
)	
)	

MOTION FOR PRELIMINARY INJUNCTION

Plaintiff Benevolence International Foundation, Inc. (BIF) moves for a preliminary injunction requiring defendants to (1) grant a hearing in which BIF may respond to any allegations against it; (2) return the property seized from BIF's offices and the home of Enaam Arnaout; and (3) unblock BIF's funds. In the alternative, BIF respectfully requests entry of a preliminary injunction requiring defendants to (a) provide BIF with copies of the seized documents; (b) return the property seized from BIF's offices and the home of Enaam Arnaout; and (c) unblock BIF's funds on a monthly basis to allow BIF to pay its operating and charitable

expenses, with or without monitoring by the government. BIF also requests such other and further relief as the Court deems just.

As explained in the accompanying memorandum, BIF has no adequate remedy at law, will suffer irreparable harm if preliminary relief is not granted, and has some likelihood of prevailing on the merits. In support of this motion, BIF incorporates herein by reference its memorandum in support of this motion.

Respectfully submitted,

One of the Attorneys for Plaintiff,
Benevolence International Foundation, Inc.

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