



Council on American-Islamic Relations

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September 19, 2008

Thomasenia P. Duncan, General Counsel

Office of General Counsel

Federal Election Commission

999 E Street, N.W.

Washington, D.C. 20463

RE: Investigation of The Clarion Fund

Dear Ms. Duncan,

I respectfully request that the Federal Election Commission investigate the actions of the Clarion Fund, Inc., a 501(c)3 tax-deductible organization (Tax ID 205845679).

The Clarion Fund recently financed the distribution of some 28 million DVDs containing the film “Obsession: Radical Islam’s War against the West” in what many political analysts describe as “swing” states in the upcoming presidential elections. Those same analysts say the distribution of the “Obsession” DVD was designed to benefit a particular presidential candidate, namely Sen. John McCain. A pro-McCain article was purportedly removed from the website of film’s distributor after this controversy came to public attention. The Allentown Pennsylvania Morning Call said the “mailing highlights Clarion’s intent to have an impact on the presidential election.”

The Patriot News in Harrisburg, Pennsylvania reported: “On Wednesday, though, there was an article on the group's new Web site, www.radicalislam.org, that backed Republican presidential candidate John McCain. The article discusses both candidates and concludes: ‘McCain's policies seek to confront radical Islamic extremism and terrorism and roll it back while [Barack] Obama's, although intending to do the same, could in fact make the situation facing the West even worse.’” (9/11/08)

In a recent commentary responding to the distribution of “Obsession,” Jeff VanDenBerg, director of Middle East Studies at Drury University, called the film “a blatant piece of anti-Muslim propaganda.” He also wrote: “The film ‘Obsession’ plays to the crudest stereotypes and promotes the simplest solutions. In the end, this kind of thinking will do far more to harm American security than it will to help it.” (News-Leader, 9/17/08)

On September 19, 2008, the Orlando Sentinel newspaper reported: “The current distribution effort appears aimed at newspapers in political swing states such as Florida, Pennsylvania, Michigan and Ohio. Because it coincides with a hotly contested presidential election, the effort seems politically motivated, said Greg Sapp, associate professor of religious studies at Stetson University in DeLand.”

According to the website for the Secretary of State for New York, Clarion Fund Inc. is incorporated in New York as a Delaware based foreign not-for-profit corporation. According to the Delaware Department of Corporations, Robert (Rabbi Raphael) Shore, Rabbi Henry Harris and Rebecca Kabat incorporated Clarion Fund. All three of whom are reported to serve as employees of Aish HaTorah International, an organization apparently based in Israel. Also according to the Delaware Department of Corporations, the incorporators of the Clarion Fund used Aish HaTorah's New York City address (150 West 46th Street, New York) to incorporate Clarion Fund in Delaware.

According to the "Obsession" website, Rabbi Raphael Shore is the founder and producer of "Obsession". Sources have reported that Rabbi Raphael Shore is an Israeli citizen who lives in Jerusalem and was employed as an executive director with Aish HaTorah International. Gregory Ross has been identified as Clarion Fund's spokesman and communications director. According to the FEC candidate contributions database, Gregory Ross is a fundraiser for Aish HaTorah International. It was reported that distributors of "Obsession" asked viewers to register for a screening of "Obsession" by visiting an Aish HaTorah website.

It appears that the funding for the production, marketing and distribution of "Obsession" may have originated from Israel-based Aish HaTorah International.

I urge you therefore to investigate:

1. Whether or not an incorporated charitable organization made contributions and expenditures in connection with a federal election; and
2. Whether or not the Clarion Fund uses the contributions of foreign nationals in connection with a United States presidential election.

Sincerely,

Nadhira Al-Khalili, Esq.
Legal Counsel

City/County of Arlington
Commonwealth of Virginia
The forgoing instrument was subscribed and sworn
Before me this _____ day of _____, 2008. by

(name of person seeking jurat)

Notary Public
Notary registration number: _____
My commission expires: _____