

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

FATIMA AMIN-HUSSAIN AND ADAM MOHAMMED

Applicants

- and -

**AHMED RAZA YOUSUF and
MUHAMMAD NINO also known as SHAYKH MUHAMMAD BIN YAHYA AL
HUSAYNI AL NINOWY**

Respondents

REPLY AFFIDAVIT OF IBRAHIM HUSSAIN

1. Muhammad Nino ("Nino" or "Mr. Nino") and Ahmed Raza Yousuf ("Yousuf" or "Mr. Yousuf"), for selfish and improper reasons, do not want the relief being sought in the Notice of Application to be granted. The facts set out in Mr. Yousuf's affidavit are in most cases untruthful or contain a distorted understanding of the situation due to Mr. Yousuf's involvement in Mr. Nino's "Sufi order."

Shaykh Nino as "Spiritual Guide"

2. Mr. Nino is known as a "Sufi shaykh" or spiritual guide. This involves Mr. Nino recruiting people to his Sufi order and getting them to pledge allegiance to him, so they become his disciples. Mr. Yousuf is currently Mr. Nino's disciple. I was Mr. Nino's disciple and his "acting muqaddam" (which means spiritual representative). I was authorized by Nino in 2015 to initiate disciples into this Sufi order. I have completely distanced myself from Nino after witnessing his negligence as a Sufi guide. Dr. Adam was never a disciple of Mr.

Nino. Nino's disciples have a secret and closed Facebook group called "Tariqa Qadiria Rifa'ia Shadhilia." This group has about 440 members. My wife, Dr. Fatima Amin-Hussain ("Dr. Fatima"), and I were members of this group until around August 10, 2018, at which point Mr. Nino instructed for my wife and I to be removed from this group. Attached hereto and marked as **Exhibit "A"** is a true copy of my appointment as an acting "muqaddam."

3. I first became a disciple of Mr. Nino seven years ago, in the early part of 2011. Over the past five years I have witnessed Mr. Nino abusing his power as a spiritual guide. Attached hereto and marked as **Exhibit "B"** is a true copy of an article on "spiritual abuse."
4. There are many characteristics of spiritual abuse that are present in Mr. Nino's order. By way of example, his insistence on the exclusivity of the order; the fact that members are to keep on donating money to the project and everything they do is never good enough; that the leader himself does not disclose his financial status to anyone, but knows others' financial state; the creating of a culture of fear and shame; cultivating a dependence on one leader only for spiritual information; and almost everything else mentioned in this article. There are other articles on spiritual abuse which talk about similar things. Attached hereto and marked as **Exhibit "C"** is a true copy of a post in the secret Facebook page on the exclusivity of the order.
5. In this order, Mr. Nino's commandments must always be followed, and his disciples are not allowed to differ with him. If they do, they are shunned and treated as outcasts. Mr.

Nino claims that he gets some sort of revelation from God in the form of visions, dreams, or voices in order to exercise control over his disciples. Attached hereto and marked as **Exhibit "D"** is a screenshot of Nino's opinion of his role as a spiritual guide.

6. I was finally able to leave the order in the summer of 2018, once I realized the nature of what it was becoming and when I realized the full extent of Mr. Nino's financial exploitation. Attached hereto and marked as **Exhibit "E"** is an email that Mr. Nino sent instructing his disciples to shun and avoid interacting with an ex-disciple named Ismail Londt, who is a reputable Islamic scholar himself.
7. Mr. Nino has also sent similar emails about another ex-disciple named Asad Dean of Mississauga, when Asad decided to leave the order in the latter part of 2015. Asad has also expressed that his reason for leaving was the increasing cultish environment of this order and Asad also left the Madina Seminary project in 2015 due to his prediction that it would be a "financial nightmare." Attached hereto and marked as **Exhibit "F"** is a true copy of Asad Dean's email correspondence in this regard.
8. A previous disciple of Mr. Nino, named Karla Evans who resides in Atlanta, Georgia also accused Mr. Nino of spiritual abuse. Mr. Nino reprimanded Karla for having the ambition of starting up her own project instead of exclusively devoting her life to his project. Attached hereto and marked as **Exhibit "G"** is a true copy of a screenshot of a WhatsApp message from one of Nino's disciples about Karla.

9. In paragraph 13 of Mr. Yousuf's affidavit he states, "The Madina Seminaries, including Madina, take their spiritual and academic directions from the founder and spiritual and academic guide exclusively, that being Nino." It is disturbing to know that Madina Seminary is becoming an avenue for Mr. Nino to recruit followers, resulting in the exploitation of innocent people.
10. I was myself subject to spiritual abuse by Mr. Nino, which has led to considerable stress. Nino's expectation was that my wife and I should fund Nino's project and pay high amounts of interest every month. At one point, I had to go to the hospital as a result of burnout from trying to meet Nino's demands. Attached hereto and marked as **Exhibit "H"** is a true copy of pictures of my visit to the hospital and WhatsApp messages in that regard.
11. Dr. Fatima has exhausted all her earnings as a physician for Mr. Nino's project. The highest monthly amount she loaned to pay Madina's bills was \$27,000 at the end of 2016. She subsequently sent a WhatsApp message to ask the other directors to chip in the following month, as she would not be able to manage. Mr. Nino called me to say that he was very upset over this and that this was the equivalent of my wife and I "throwing our shoes" at him, which is grave insult in Arab culture.
12. In a meeting in July 2018, Mr. Nino stated that some doctors in his order give half of their income to him. Due to the catastrophic financial state, which would personally impact the lives of Dr. Adam, Mr. Yousuf, and my wife and I, drastic steps had to be taken to safeguard the ongoing financial state of Madina Seminary. It is only these four people

whose lives would be severely impacted by a possible power of sale of the Speakman Drive property as we are all guarantors. No one else, including Mr. Nino, would be financially affected. My wife and I, as well as Dr. Adam, have young children whose lives would also be affected.

13. Mr. Nino has not contributed any money to the project at all and has nothing to lose financially.

My Role in Madina Seminary

14. In paragraph 7 of Mr. Yousuf's affidavit he states, "At no time was Ibrahim ever a director or member of Madina...." However, in a board meeting on January 3, 2016, I was added as a member by approval of all directors. Attached hereto and marked as **Exhibit "I"** is a true copy of the minutes of the board meeting.
15. Madina Seminary's corporate lawyer, Syed Naseer Irfan, also stated that my status as a member of Madina was undeniable.
16. Furthermore, on the CRA website, I am listed as a director of Madina Seminary. The listing of me as a director (despite me never claiming to be a director) on the CRA application was done by Balraj Singh, Madina's accountant, who is also Mr. Yousuf's personal accountant. Attached hereto and marked as **Exhibit "J"** is a true copy of a printout from the CRA website.

17. Mr. Nino and Mr. Yousuf threw me aside when they said that they didn't recall that I was a member during the meeting on July 30, 2018. Attached hereto and marked as **Exhibit "K"** is a true copy of the minutes of the meeting on July 30, 2018.
18. They also forgot how I spent day and night working for the Seminary without remuneration to make sure the lights stayed on, about how I would teach students daily and recite the entire Quran in Ramadan and lay the red carpet for Nino to attend and make the special prayer on the completion. They forgot when I secured a one million-dollar interest free loan for the Seminary from my friend, Ismail Jasat. They forgot when I maxed out my credit cards so that the Seminary bills were paid. Nino forgot the times when I paid for his expensive meals at restaurants and hotel stays. They both forgot how I collected major donations from my contacts, whether it was \$50,000, \$25,000 or \$15,000 and how I never, during this time, asked for any compensation for soliciting major gifts and donations.
19. Nino told me that he needed money to save up for a home in Canada and I helped him save over \$25,000 in his BMO account in less than a year.
20. I liaised with our Seminary corporate counsel to obtain charitable status and with our planning consultant to ensure that we obtained an occupancy permit and worked hard to secure the exemption of property taxes and to obtain rebates from the city. I made sure I paid our consultant and lawyer on time, sometimes from my own pocket and from my salary from a school where I worked part time for 16 hours a week, so I could devote more time to the Seminary without pay. But all the above was forgotten and disregarded just

because I spoke the truth about the reality of the financial situation at the Seminary. Ultimately, I had no choice but to resign due to the exploitation set out in my resignation letter on August 2 this year. Ever since I resigned, Madina Seminary lacks credibility. I continue to serve as an Imam at a mosque in Mississauga and am regularly invited to speak at conferences across Canada, despite Nino's attack on my character and reputation. Attached hereto and marked as **Exhibit "L"** is a true copy of conference posters.

21. Attached hereto and attached as **Exhibit "M"** is a true copy of my wife's dissent letter as a member of the board sent to Nino and Mr. Yousuf following my resignation.
22. Attached hereto and marked as **"Exhibit N"** is a true copy of the defamatory WhatsApp message sent at the direction of Nino, which the respondents failed to attach to my defamation claim in their responding record.
23. In paragraph 7 of his affidavit, Mr. Yousuf states "...the signing of the Resolution authorizing the sale of Madina's property was wrongful..." In fact, the resolution to sell the building was passed after consultation with Madina's charity lawyer, Syed Naseer Irfan. The lawyer had stated that the 2 versus 2 directors' deadlock could be broken by a member who comes in and breaks the tie. He also stated that a written resolution was enough to break the tie of votes of directors. Mr. Nino and Mr. Yousuf had already provided their written opinions about how they did not support the sale of the campus.

24. The listing was cancelled by Colliers after there was no further need for the listing to remain, since we had already received a substantial offer from the Olive Grove School of the Muslim Association of Canada ("MAC") to buy the building for \$4.75 million.
25. Mr. Yousuf states that there is a conflict of interest between having both my wife and I on the board since we are married. However, according to the laws relating to charities, an incorporated non-profit can have family members who are related by either marriage or blood as directors. It is only for non-incorporated charities that family members cannot be on the board. In any event, I was not on the board. The real conflict of interest in Madina is not between my wife and I, but rather between Mr. Nino and Mr. Yousuf. Mr. Nino dictates to Mr. Yousuf exactly what to do and Mr. Yousuf apparently has no say in the matter. In fact, Mr. Yousuf stated that if Mr. Nino "told me to jump off a bridge I would do so."
26. In paragraph 9 of his affidavit, Mr. Yousuf stated, "I arranged for a mortgage to be granted by one of my companies, Bay International Inc., in the amount of \$225,000.00." This mortgage was registered on the title of 2380 Speakman Drive without the formal consent of the board or the Seminary's corporate lawyer. It was registered by Mr. Yousuf's lawyer at the time who seemed to have acted for both Bay International Inc. and the Seminary at the same time, which was a conflict of interest. When I investigated this matter and informed the board, Mr. Yousuf immediately said he had given instructions to his lawyer to remove the charge. Attached hereto and marked as **Exhibit "O"** is a true copy of Mr. Yousuf's email where he says he will remove the charge from Madina's property.

27. However, Mr. Yousuf has clearly not removed the charge as of the date of his affidavit, as it still remains on the parcel register.
28. In paragraph 11 of his affidavit, Mr. Yousuf states, "The loans reflected as current liabilities are in the nature of donations that are made by various members of Madina....." Mr. Yousuf should clarify who these "various members of Madina" are. Mr. Yousuf and Nino have denied that I was a member of Madina, but I am unaware that there were any other people who were ever appointed to be "members of Madina." The money that was given by Dr. Fatima and Dr. Adam were interest-free loans, which means they are to be returned. The donations are reflected in the tax receipts that were given. Dr. Fatima donated \$25,000. Attached hereto and marked as **Exhibit "P"** is a true copy of Dr. Fatima's donation tax receipt.
29. The money that was loaned by Dr. Fatima, Dr. Adam and Mr. Yousuf consists of the total of multiple lump sum payments that were deposited into the Madina account over the past three years in order to pay for Madina's utility payments, mortgage payments and other expenses. As mentioned in the first set of affidavits, the total for Dr. Fatima and Dr. Adam was \$1,242,000. The total amount of money that Mr. Yousuf loaned was specified as \$500,000 in his affidavit. Mr. Yousuf is opting to state that his loan is a donation in order to please his spiritual guide, Mr. Nino. Included in Dr. Fatima and Dr. Adam's loans is the money that they loaned to Madina from the financing of their houses.

30. In paragraph 12 of his affidavit, Mr. Yousuf states, "The Sufi Order also has a charitable wing referred to as Madina Mercy which operates worldwide delivering aid, food and help to the homeless, needy and orphans in various local communities." In fact, Madina Mercy is an online revenue generating project that Mr. Nino came up with. Mr. Nino told us at a meeting that took place at a restaurant in Mississauga in December 2017, that he would be using the money from the Madina Mercy project towards the mortgage payments for the Madina property in Arkansas and any leftover money would go towards the Speakman mortgage. However, they advertise that they are raising money to feed the hungry and help with education of students. This is a form of deception to the public. The estimated total of money raised is \$10,000. Some were one-time donations, and some were monthly recurring donations. Dr. Fatima and I became monthly donors of this project of Nino, as per his command to all his disciples to donate \$100 USD a month. However, we cancelled these monthly recurring donations once we realized that this whole online project was a form of deception. Attached hereto and marked as **Exhibit "Q"** is a true copy of a Madina Mercy newsletter about its supposed purposes.
31. In paragraph 13 of his affidavit, Mr. Yousuf states, "The mission of Madina is to attract young and active members in the Canadian Muslim Society...." Mr. Nino has different dates for the religious holidays that Muslims celebrate, such as Ramadan and Eid, stating that he has received revelation that the holidays should be celebrated on such and such date, different from the dates of the mainstream Muslim population. Attached hereto and marked **Exhibit "R"** is a true copy of a post of his disciple providing the next 10 years of Islamic dates on the secret Facebook page.

32. In paragraph 19 of his affidavit, Mr. Yousuf states that I left my positions at the JRJ mosque and Milton association due to "irresponsible behaviour." I filed a lawsuit against the Milton association in order to obtain justice and to fight for my rights through Ontario's legal system. To this day, I am still invited by JRJ mosque to speak at Friday prayers and special events and they also sent me several requests asking me to return when I resigned from there in 2013. The Muslim community in Milton also continues to invite me regularly to speak and have sent many requests asking me to return but I wanted to dedicate and devote my entire time, money and energy to the Seminary and I did. I now continue to serve the Muslim community in Canada as an Imam at a debt-free, established mosque in Mississauga.
33. I have been made aware that Mr. Yousuf has manipulated an elderly Muslim man in his eighties, Mr. Munir Subhani, who is owed a substantial sum of money (over and above the \$100,000 loan to Madina Seminary) by Mr. Yousuf.
34. This is harmful for the Seminary, as when a treasurer is not deemed trustworthy then our community members, much like any other community, would not trust the charity.
35. In paragraph 22 of his affidavit, Mr. Yousuf states, "...Nino had to reprimand him (Ibrahim) on occasion for failing to follow the mission and vision guidelines of Madina." Mr. Nino who resides in Georgia, USA, was dictating matters in a Canadian non-profit organization. Moreover, Nino is not fit to be a spiritual guide when he commands people to do things

that are contradictory to the basic teachings of Islam. In Islam, one is to avoid interest-based transactions, especially for religious projects and avoid excessive amounts of debt (as in most religions, high amounts of debt are not desirable, as one should live within ones means). Madina Seminary is currently in \$3,900,000 of debt. Nino has been continuing to this day, commanding us to take on large amounts of personal debt in order to sustain Madina Seminary. Nino is currently encouraging Yousuf to put a lien on one of his personal properties. It also seems that Nino is encouraging Yousuf to take on the responsibility of paying off the total amount of the debt on his own.

36. In all this time, he insists on flying business class, staying in 5-star hotels when he travels and receiving honoraria despite the extreme financial struggle that Madina Seminary is going through.
37. In paragraph 23 of his affidavit, Mr. Yousuf states, "The tensions between Ibrahim and the directors of Madina escalated in the early summer of 2018. Ibrahim was seeking to establish himself as an Imam with some other institution and searching out other opportunities behind the backs of the directors of Madina....." While this is false, as I was not seeking to establish myself as an Imam elsewhere, it goes along with Mr. Nino's spiritual abuse of people. Mr. Nino has stated many times that his disciples are to focus on the Madina project solely throughout their lives and are not allowed to pursue any other type of religious work or have any other ambitions in life. He likes to exercise total control over his disciples. Mr. Nino's disciples have no freedom to do any religious work without Mr. Nino's approval.

38. In regard to paragraph 24 of Mr. Yousuf's affidavit, the resolution to sell the building was passed by the majority of the directors and members of Madina Seminary and was directly emailed to both Mr. Nino and Mr. Yousuf, who then responded to the email. The resolution was passed due to a financial crisis and written threats of lawsuits from creditors that required urgent action. The written resolution was prepared and signed and sent after obtaining legal advice from Madina's corporate counsel over the telephone. Attached hereto and marked as **Exhibit "S"** is a true copy of a demand of loan repayment from Randall Shaw dated June 16, 2018, subsequent to which Mr. Shaw did take action against the Seminary and obtained a judgment of \$225,000 plus costs.
39. In the demand letter, Mr. Shaw expresses surprise at the fact that Madina Seminary has taken on interest-bearing debt and of the importance of organizations like Madina honouring their agreements.
40. In paragraph 26 of his affidavit, Mr. Yousuf states, "All directors participated in the purchase and financing of the Property through the HMT Mortgage and otherwise". This happened because of Mr. Nino's role as spiritual guide and his direction on the "right" course of action. Mr. Nino's approval of this mortgage was a green light, since to the group members it was only his approval that mattered. However, Nino and his disciple Yousuf have forgotten that this loan was a 6-month bridge loan that was taken to close on the Speakman property. Back then, the guarantors took this bridge loan with the intention that

it would be paid off by an interest-free loan. I highlighted to Nino and the board when Harbour presented a 15-year mortgage, that I could not see light at the end of the tunnel in this mortgage and strongly suggested that the property should be sold and even passed a motion for the sale at a casual meeting at a restaurant held back in February 2018. Dr. Fatima, Dr. Adam and I voted for the sale. Nino said we must not change our intentions now and that we should wait until Ramadan then revisit the sale discussion. Then in Ramadan, Nino didn't show up to our fundraiser. Instead, when I sent a message about how we should sell, and Dr. Fatima and Dr. Adam agreed, Nino said that we can "leave and take their money." Nino is blaming the guarantors for taking this mortgage and has no textual proof to validate the lawfulness of engaging in interest in the Islamic faith, despite his claim for it being lawful. However, Nino, as the spiritual guide, had stated to us that he had received "spiritual approval" to buy this property in the first place. It seems this approval was from his own ego and was fake.

41. In paragraph 34(b) of his affidavit, Mr. Yousuf states, "There had been no previous communications either verbal or written regarding the religious impact of obtaining a business loan." In fact, there were several such communications both verbal and written over the course of one year, starting around August 2017. Dr. Fatima wrote an email, mentioning her concerns over this issue in August 2017. Dr. Fatima also discussed this topic with Mr. Nino in person at a restaurant in December 2017. Ibrahim discussed this topic many times with Mr. Nino in person. Mr. Nino himself stated many times that interest-based transactions are not desirable according to Islamic law, however he did not

provide any further guidance on the topic. Attached hereto and marked as **Exhibit "T"** is a true copy of Dr. Fatima's email on concerns about the large business loan in August 2017.

42. In paragraph 37 of his affidavit, Mr. Yousuf states, "Fatima and Adam only attended at the Property once or twice a year to participate in events." Dr. Fatima went to the Property every Sunday with her children who attended the Sunday school. Dr. Fatima was the one who ordered and created the filing cabinets that contained Madina's legal documents and other paperwork. She spent hours each week maintaining and organizing Madina's paperwork on a regular basis. Dr. Adam is a thoracic surgeon covering two large hospitals in Mississauga and, as such, does not have a lot of spare time, since he is busy saving lives. Whenever we had needed Dr. Adam he was always there, whether it was for signing cheques or lending money or being present at a board meeting, or even meeting a prospective donor. Mr. Yousuf, however, has always been hard to meet and even reach over the telephone ever since 2015.

43. Despite the fact that the Madina Seminary project in Mississauga is a financial disaster and is about to go through power of sale proceedings, Mr. Nino is expanding his project across Canada and is planning another campus in Edmonton. He also wants to start up a seminary in Vancouver as well. Nino is starting these projects with no financial planning and is only concerned about expanding his group of disciples worldwide and now across Canada. His primary concern appears to be the number and size of the "Seminaries" that he has. Attached hereto and marked as **Exhibit "U"** is a true copy of the poster advertising the prospective campus in Edmonton.

44. In paragraph 12 of his affidavit, Mr. Yousuf states, "Madina Seminaries exist and operate in three different States in the United States of America, in the United Kingdom and South Africa, in Norway, in India and in Malaysia and now through Madina in Mississauga." I know that the organizations that operate in Norway, India, and Malaysia, cannot truly be called "Seminaries" by any stretch of the imagination. Mr. Nino likes to add multiple countries to the list, to show the expansion of his Sufi order in contrast to the humility expected in a "Sufi shaykh."
45. Normally, a seminary is a place of religious learning with many teachers and faculty members. Madina Seminary in Mississauga, and now Edmonton and possibly elsewhere, consists of literally only one or two inexperienced teachers, with Mr. Nino being the main, absentee teacher.
46. Mr. Nino started a one-year training program called the "Usul ud-Din" Program which he teaches over the course of one weekend per month for one year. After graduating from this one-year program, his students are now taking on the role of Imam and teaching courses on advanced topics such as spirituality at Madina Seminary. These improperly trained graduates are a harm to the community but just because they are his disciples, he deems them fit to lead communities, simply because they do whatever he says.
47. One of the students/disciples and a graduate of Mr. Nino's one-year training program has some very concerning mental health problems. This student had disclosed to both me and Mr. Nino the symptoms that he has. This disciple stated in a written letter that he is

experiencing very distressing and extremely frequent voices in his head that tell him to worship Satan and other evil things. I tried to advise this disciple to see a doctor. Sometime during 2017, this disciple got involved with another manipulative shaykh and under his guidance he received training to become an “herbal practitioner.” We currently do not know if this disciple of Nino is on any pharmaceutical medication to treat his symptoms which, I am advised by Dr. Fatima and do verily believe, sound like schizophrenia or schizoaffective disorder. Despite knowing this, Mr. Nino has authorized this disciple to teach a weekly course on spirituality. Mr. Nino does not care about his disciple’s well being or mental health and is only looking for anyone who can do the work of the Seminary. This shows Mr. Nino’s complete lack of competency as a spiritual guide. Attached hereto and marked as **Exhibit “V”** is a true copy of the letter from the disciple describing his symptoms with his name redacted.

48. Currently, the chief operating officer of Madina Seminary, Mr. Abu Bakr, has posted some posters on Facebook advertising a mental health counselling service started up by Madina Seminary. Dr. Fatima has sent Mr. Abu Bakr a letter asking for him to disclose to her exactly who these mental health counsellors are and the extent of their mental health counselling training. However, Mr. Abu Bakr has not to replied to Dr. Fatima to date.
49. Nino claims that 2380 Speakman Drive is a “waqf” or religious endowment that must be honoured and can never be sold. This is Nino’s opinion and not the opinion of others such as Dr. Fatima, Dr. Adam or I, especially since 2380 Speakman Drive is not even zoned to be a place of worship. However, Nino himself has sold a “waqf” in Georgia. He sold his

mosque because he had bought a bigger property and no longer had any need for the smaller one. Mr. Nino sold his smaller property to another Islamic organization, known as Faizan-E-Madinah, which is what we propose to do by selling the Seminary building to the Muslim Association of Canada. Attached hereto and marked as **Exhibits "W" and "X"** respectively are true copies of posters advertising Madina Institute USA's first mosque and a poster of Faizan-E-Madinah's advertising of an event at their new premises at 4991 Burns Road in Lilburn, Georgia.

50. In Exhibit "Y" of his affidavit, Mr. Yousuf has improperly attached a settlement offer to Dr. Fatima, Dr. Adam and I. In this offer, Ahmed is proposing to have the loan amounts of Dr. Fatima and Dr. Adam registered as a mortgage on the Speakman Drive property. However, this is not possible as Dr. Fatima and Dr. Adam are directors and fiduciaries of Madina Seminary. Yousuf was able to put a mortgage on the property in the name of his company, Bay International Inc., despite being a director of Madina Seminary and by using a lawyer who was in a conflict of interest by representing both parties (in the mortgage for \$225,000).
51. In paragraph 38 of his affidavit, Mr. Yousuf states "With respect to the Shaw loan, prior to Shaw obtaining a judgement, I had proposed that I would negotiate a forbearance from Shaw for a one-year period providing security on one of my own properties. However, Fatima, Adam and Ibrahim were not prepared to support the same." Our charity lawyer advised that there was no need for Dr. Fatima, Dr. Adam and I to sign anything to show our support of Mr. Yousuf's arrangement with Mr. Shaw, since it involves Mr. Yousuf's

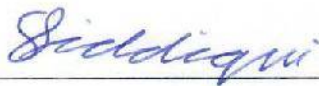
personal property and he could proceed as he wished with Mr. Shaw. Furthermore, despite having multiple meetings and opportunities to discuss this with us, Mr. Yousuf failed to provide us with any documentation regarding this arrangement of his. Attached hereto and marked as **Exhibit "Y"** is a true copy of the email from the Seminary's charity counsel in regard to Mr. Yousuf's failed forbearance of Mr. Shaw.

52. In conclusion, I would encourage Mr. Yousuf and Mr. Nino to reflect on their behaviour and make some changes while there is still time. Mr. Nino cannot continue in this manner of reckless and careless leadership and ask Mr. Yousuf to do his constant bidding with no regard for consequences or any concern for the people whose material lives and souls they have harmed.

Sworn Before Me)
this 21st day of November, 2018)
at the City of Mississauga,)
in the Province of Ontario.)



Ibrahim Hussain



A Commissioner for taking Affidavits, etc.

This is Exhibit A referred to in the
Affidavit of Ibrahim Hussam
Sworn before me this 21st
day of November 2018

Seddiqui

COMMISSIONER, ETC.



Omar Sabsabi ▶ Tariqa Qadiria

Rifa'ia Shadhilia - الزاوية النينوية

الطريقة الشاذلية الرفاعية

June 20, 2015 · 🌐

It is my pleasure and honor to announce that Sayyidina Shaykh Muhammad (Hafidhahu Allahu Ta'ala) has promoted Sidi Shaykh **Ibrahim Hussain** , after the 3 day Khalwa at the Prophetic Masjid in Madina, to an acting Muqaddam, and head of the Alawi Ninowi Zawiya in the Toronto area. As you all know, while there were some Murids and lovers in Toronto for a while, but no official Zawiya structure was put in place. Alhamdulillah, with a Hafidh of the Qur'an and a properly trained scholar like Sidi Ibrahim, the Zawiya there can finally have an academic and spiritual leadership. For years now, and upon graduating with a Masters in Islamic studies and traditional Hanafi Madrasah, Sidi Shaykh Ibrahim has demonstrated willingness, zeal, and loyalty (Wafa') to the Alawi Ninowi line and its masters and grandmasters. Tasawuff is Adab in the first place, followed by love and loyalty. With this promotion, Sidi Shaykh Ibrahim is authorized to initiate new Murids into our Sacred Tariqah, hold Adhkaar, sit on the sacred Sajjada, raise the Flags of the Zawiya, permitted in the secrets/practices/Awraad/Ahzaab/ Wazaa'if of the Qadiri Rifaa'i and Shadhili Turuq specifically and all other 40 Tariqahs we have, and help Murids and lovers of the Alawi Husayni Ninowi line wherever he goes. We urge all to work through



Write a comment...





Omar's Post



help Murids and lovers of the Alawi Husayni Ninowi line wherever he goes. We urge all to work through him and cooperate with him. Being part (whether member or leader, in any capacity) of the Sacred Zawayah is not a right, but a privilege and an honor that must be maintained. Sidi Shaykh Ibrahim will be working with Shaykh Abdul Qader on Canada Zawayah matters, as he oversees the Canada activities in general and a member of the SST. Please join me in congratulating Sayyidi Shaykh Ibrahim, Hafidhahu Allah, and pray that Allah Ta'ala enables him to carry this heavy responsibility by representing the Sajjada Alawiyya there properly, and helps him in his duties to ensure the continuity and spread of the spiritual Alawi Husayni Ninowi line by strictly adhering to the Qur'an and prioritizing it, then the authentic Prophetic Sunnah, then the methodology of the Itra Ahlul Kisa', alayhem assalam under the representative of their shade on earth today: Sayyidina Shaykh Muhammad bin Yahya al-Alawi al-Husayni al-Ninowi, may Allah Ta'ala sanctify his secrets, continue his blessings upon him, and grant us the Rizq, Fahm, and remove the Hijab before our eyes, so we can benefit from his presence, wisdom and knowledge.



Write a comment...



This is Exhibit B referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 2018

Sadiqul

COMMISSIONER, ETC.

10 Ways to Spot Spiritual Abuse

Spiritually abusive ministries...

1. **Have a distorted view of respect.** They forget the simple adage that respect is earned, not granted. Abusive leaders demand respect without having earned it by good, honest living.
2. **Demand allegiance as proof of the follower's allegiance to Christ.** It's either his/her way or no way. And if a follower deviates, he is guilty of deviating from Jesus.
3. **Use exclusive language.** "We're the only ministry really following Jesus." "We have all the right theology." Believe their way of doing things, thinking theologically, or handling ministry and church is the only correct way. Everyone else is wrong, misguided, or stupidly naive.
4. **Create a culture of fear and shame.** Often there is no grace for someone who fails to live up to the church's or ministry's expectation. And if someone steps outside of the often-unspoken rules, leaders shame them into compliance. Leaders can't admit failure, but often search out failure in others and uses that knowledge to hold them in fear and captivity. They often quote scriptures about not touching God's anointed, or bringing accusations against an elder. Yet they often confront sin in others, particularly ones who bring up legitimate biblical issues. Or they have their circle of influence take on this task, silencing critics.
5. **Often have a charismatic leader at the helm who starts off well, but slips into arrogance, protectionism and pride.** Where a leader might start off being personable and interested in others' issues, he/she eventually withdraws to a small group of "yes people" and isolates from the needs of others. These ministries and churches harbor a cult of personality, meaning if the central figure of the ministry or church left, the entity would collapse, as it was entirely dependent on one person to hold the place together.
6. **Cultivate a dependence on one leader or leaders for spiritual information.** Personal discipleship isn't encouraged. Often the Bible gets pushed away to the fringes unless the main leader is teaching it.

7. **Demand blind servitude of their followers, but live prestigious, privileged lives.** They live aloof from their followers and justify their material extravagance as God's favor and approval on their ministry. Unlike Jesus' instructions to take the last seat, they often take the first seat at events and court others to grant them privileges. They typically chase after wealth—at any cost, and often at the expense of the very people they shepherd.
8. **Buffer him/herself from criticism by placing people around themselves whose only allegiance is to the leader.** These leaders and churches view those who bring up legitimate issues as enemies. Those who were once friends/allies swiftly become enemies once a concern is raised. Sometimes these folks are banished, told to be silent, or shamed into submission.
9. **Hold to outward performance but rejects authentic spirituality.** Places burdens on followers to act a certain way, dress an acceptable way, and have an acceptable lifestyle, but they often demonstrate licentiousness, greed, and uncontrolled addictions behind closed doors.
10. **Use exclusivity for allegiance.** Followers close to the leader or leaders feel like lucky insiders. Everyone else is on the outside, though they often long to be in that inner circle. If someone on the inner circle speaks up about abuses, lapses in character, illegal acts, or strong-arming, that insider immediately moves to an outsider. Fear of losing their special status often impedes insiders from speaking up.

I'm sure I've missed some traits, but looking from the outside, these resonate most. Do any of these traits resonate with you? Do you have any more to add? My hope is that by writing about these excesses publicly, we can begin to dialog openly about this very real problem. Hiding it or pretending it doesn't exist simply adds more confusion and anger to those who have walked through the trauma of spiritual abuse.

This is Exhibit C referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 2018

Siddiqui

COMMISSIONER, ETC.



Muzammil Syed ▸ Tariqa Qadiria Rifa'ia



Shadhilia الزاوية النينوية-الطريقة الشاذلية الرفاعية

July 31 at 9:03 AM · 🌐

Q: "Sayyidi, what differentiates our Alawi from the Alawi of other tariqas?"

Sidna Shaykh: "As far as I know, there is NO other Alawi tariqa other than ours!"

30th July 2018



Like



Comment



25



Azam Jahangier

Did Sayyidi explain his answer?

1 mo Like Reply More



Muzammil Syed

Yes - will expound in a few hours 👍 1

1 mo Like Reply More




Muhammed Yusuf Khan





Muzammil Syed

Yes - will expound in a few hours  1

1 mo Like Reply More



Muhammed Yusuf Khan

.

1 mo Like Reply More



Adnan Rashid

Please do share when you can sidi. Jzk.

3 wks Like Reply More



Muzammil Syed

Salaam, apologies for the late reply.

Essentially, Sidna said that he knows off no other Tariqah or school that follows the manhaj of Imam Ali AS in both THEORY & PRACTICE. All other tariqa's merely make claims, but no one else walks the line. This is the line of Imam Ali AS.

Furthermore, he added that there are a few things that makes a school "Alawi" in the truest sense:

1) Comprehensive scholarship. Not just semi-scholarship or pseudo-knowledge, but rather a a very comprehensive scholarship of the different sciences.

2) Izn (Permission). You need to be given permission by Imam Ali AS himself.

3) Rooted Spirituality. The spirituality of the Alawi school is to be found in the Quran and Sunnah. Moreover, the Alawi manhaj is to prioritize the Quran, Sunnah, and then the Itra (in that order).

4) Dawah. Calling people to Allah ta'la and his Rasool SAW first and foremost, and then the Ahlul Bayt AS (in that order as well).

He further added that this is a school of warriors, and that never forget that Imam Ali AS is present with you. May Allah ta'la bless Sayyidi Shaykh, and grant him all the success in this world and the next. Ameen

Should you have any questions, please don't hesitate to let me know 😊



5

3 wks Like Reply More



Azam Jahangier

How is Sayyidina Ali present with us? 🙏 1

3 wks Like Reply More

This is Exhibit D referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 2018

Siddiqui

COMMISSIONER, ETC.

[About](#)[Discussion](#)[Photos](#)[Events](#)[Files](#)**Arshad Mahmood is with Issa Bin Yahya.** ...

Admin • Friday at 6:34 AM •

"Your Shaykh is not just the teacher you actually only heard knowledge from, but is the one you imbibed from. Your Shaykh is not the one whose words are in your ears and on your tongue, but the one who lives deep in you, with his vision, thoughts, and breath. Your Shaykh is not the one who invited you to join him, but the one who removed all veils, distances, and protocols between you and him. Your Shaykh is not the one whose speech affects you, but whose Himma (perseverance, persistence, vision and motivations) raises you. Your Shaykh is the one who continuously keeps cleansing and cleaning the mirror of your heart, until your vision of the truth becomes clearer and clearer, and until the Rabbani illuminations shine all over your heart and overwhelms it. Your Shaykh is the one who taught you about Allah Ta'ala and His People, so you followed their way, and walked with you until you become close to Allah Ta'ala..very close.., then threw you in the oceans of the lights and illuminations of the Magnificent Presence of Allah Ta'ala, telling you: here you are and your Lord".

~ Sayyidinâ Shaykh Muhammad bin Yahya al-Husayni al-Ninowy, hafithahu Allah



From: <asad@deanandassociates.ca>

Date: January 7, 2016 at 10:53:59 AM EST

To: Shaykh Ninowy <mymsna@gmail.com>

Cc: Ahmed German <ahmedrazayousuf@gmail.com>, "Dr. Adam Mohammed"

<adamhamde@gmail.com>, "Dr. Fatima Amin" <fatima.amin786@gmail.com>, "Ibrahim Hussain"

<shaykhussainchishti@hotmail.co.uk>, Ibrahim Quadri <ibrahimquadri@hotmail.com>, Amjad Qureshi

<amjad_q84@hotmail.com>, "Kashif Sher" <ksher@aryasher.com>, "Dr. Rabia Azim"

<clients@minmaxx.com>, "Azim Rizvi" <azim@minmaxx.com>, Asif Ruhomutally

<ka_yamba@yahoo.com>

Subject: Return of funds from Madina Seminary

Bismillah,

Asalamulaikum Dear Shaykh and Madina Team,

I pray you all are in the best of health and spirits.

If you are good only to those who are good to you then what good are you - Quote from Shaykh Ninowy

As per Shaykh Ninowy's instructions (See below) that have become public and viral on facebook below I would then ask that the funds I have given be returned immediately as I have another Islamic project which I am investing in immediately. As you can well appreciate I did not ask for these funds until such public broadcasts are being made unnecessarily. I just find it unfortunate that we cannot directly communicate and come to amicable understanding even if we agree to disagree.

I find the behavior of your senior leadership childish and unprofessional to say the least and would advise the Canadian Madina team to keep such useless secretaries out of their future affairs and far away from their destructive influence. I was aware of this fact for a while so I politely stepped aside without discouraging anyone and simply stated my personal reasons.

Dr. Adam/Fatima/Ahmed/Rabia/Kashif: Since Shaykh Ninowy's senior leadership loves to talk and I had to refrain from assisting beyond all that I have done because frankly they are neither appreciative or respectful for all the year's of efforts I have personally put in to

promote you since I brought you here since 2005. You can read Abdul Qader's own words and if you were wondering why I left the reasons are stated by Shaykh's secretary below.

I never did any work for titles or directorship and on record don't have one as Maulana Ibrahim is stating. In fact me and Ibrahim Quadri selflessly for all these years. If I recall I see him being titled Executive Director all over the place which is fine but then let's not tell others such things.

I will be giving Dr. Adam a full account of the Mawlid book printing and he has been to the print shop and knows how many we printed, costs and all the efforts to distribute and sell these which mostly was used to help events, organizations and remove misconceptions. I will be sending the 500 books to Atlanta as promised and the delay was due to some personal reasons and we had to clear outstanding balance with the printer which I have done now.

My Ideological Differences with Shaykh Ninowy's senior leadership team

As far as the 12 Imams issue goes I would advise you and your team to drop the subject as many prominent Sufia and Ulema of this nation held this opinion especially around your team you have Dr. Adam who is a murid of Umar bin Hafidh and his students are encouraged to read the biographies of the twelve imams (The book is attached), Ahmed German and his father have a Bareilvi background and Ahmed Raza Khan praised and believed in the 12 imams, Ibrahim Chisti and his father are Chisti's and this is also part of their beliefs including Pir Meher Ali Shah, Nizamuddin Aulia, etc. In fact all of South Asia from Anwar Shah Kashmiri down to Shah Waliullah to Shah Abdul Haq Dehlavi to all Deobandi ulema have my opinion. So please ask your team to be more tolerant and respectful. I will be publishing several works to remove this misconception inshallah and will personally send you those copies inshallah starting with Shaykh ul Islam Muhaddith Ibn Hajar Asqalani, Hafidh Muhaaddith Sibti Ibn Jawzi, Muhaddith Khawja Parsa, Rumi, Qadiri, Chisti, Naqshabandi, etc. Not to speak of the great Imam Sharani, and the poem of Abul Hasan As Shadiliyyah on 12 imams, etc. You can appreciate that you are not the only Muhaaddith and we don't need to agree with all your views. I find it very strange that your senior leadership declares the Hadith of Mahdi not mutawater. The ummah at large disagrees with you and your team and when I joined you in 2005 this was not your view and you gave a lecture in England in 2006 that reiterated the Hadith of Mahdi is Mutawater as per your Shaykh AHmed bin Siddiq Al Ghumari. You seem to disagree with him so why can't we disagree with you respectfully? I am attaching conversations I had with your spokespeople where I disagreed with them so everyone here can review. Maulana Ibrahim

collected funds on 10th Muharram at Masumeen Islamic Centre that is Shia. Azim Rizvee and Rabia assisted with the property and Azim is shia and believes in 12 Imams. I am a Sunni and I believe in the 12 Imams. This is a point of unity and commonality in my opinion between the different schools. We should celebrate this.

As your student I don't agree with your students or your view and never did in fact on this subject and did not need to since I joined you in 2005. I still however worked for the benefit of the dawah but it seems to be a very serious matter for you and your senior leadership as we can see by your direction and statements.

Ahmed: You had asked me if there was a rush to get the funds back and I politely told you no. Unfortunately with such public statements by Abdul Qader and supported by Maulana Ibrahim I have to request for my funds so I can move on and do my own project which we have put an offer on and I require it for the deposit.

I wish you the best of luck and I think we can collaborate and support one another and I will not give such public statements about my differences with Shaykh Ninowy's team and I expect the same. We should make more efforts on promoting real love and peace and unity. That is what is needed and I have never brought harm to your dawah but it seems your team is bent on discrediting me for some reason. I sponsored and encouraged Nazim Baksh to have you as the main speaker at the Mawlid last Sunday, we sold 80 books and used the funds to send 100 free copies to Guyana for ulema their and help out the program. That is positive and I will continue to do positive work inshallah. I have sponsored two students what are studying in Atlanta and I am sending them money for their expenses as much as I can. I had a client who came to my office looking to donate \$200,000 dollars and I told him to consider your seminary. I have several specialists like Dr. Adam in my practice who would like to help such a project but they don't want this unprofessional conduct unfortunately. I help any association that promotes moderate teachings so I would urge you not to cut ties with your allies. This is not a good practice. Also if you hear any concerns of your members speak to them directly and don't make announcements thru people who lack communication and interpersonal skills like Abdul Qader (A man without a face).

Please forgive any shortcomings on my part but I would appreciate we don't give any more statements and let everyone do what they believe in peacefully and respectfully.

Thanks,

Asad Dean, CPA, CMA
Dean & Associates Accounting
2550 Argentia Road, Suite 215
Mississauga, ON L5N 5R1
C: 647-273-3094
F: 905-247-0338

Broadcaster: Abdul Qader - Secretary of Shaykh Ninowy to world wide murids on Tariqah group on facebook

Quoted verbatim:

Assalamu Alaykum fellow Murids:

Re: Canadian-Indian brother Sayyid Asad Dean:

We have been getting complaints that the brother is forming his own groups, complaining why he is removed from Madina Institute India, etc..

I take permission from Sidi Abu Ali and I don't want to go into details.

But to make it crystal clear: The Shaykh himself suspended brother Asad Dean from all and everything that has to do with us, our Tariqah, institutions, etc.. I.e. Asad is no longer part of anything to do with us, does not represent the Shaykh or the Tariqah or Madina Institute in anyway, capacity, or form, whatsoever, or any project related to the Shaykh, Madina, Zawayah, etc.

This direction is not from myself or the senior US leadership, this has been known for some months now.

Now, this is not to slander the brother, whom our Shaykh believes to be a good man, nor to declare anything against him.

It is simply to say that his mission/vision and that of our Shaykh do not see eye to eye anymore. The brother feels as he knows enough and has his own ways and vision, we wish him the best in his endeavors. We do not want to associate with him, nor want to have

animosity or ill feelings against him.
He goes his ways and we have ours.

THIS DIRECTIVE IS FROM THE SHAYKH and the SHAYKH only. (not the post, but this conclusion regarding the brother).

I am just putting this on here, because it was still on my watch when all these things were happening and decisions were being made, and things have been brewing behind the scenes, lots of talk (ill one), etc.. The best a Sufi can do, is make Du'a for those we disagree with that Allah Ta'ala guides us and them, thats all.

Sayyidi believes that the Alawi Husayni Ninowi Tariqah is a privilege to be maintained. It entails; selfless work, no claims, patience, perseverance, and faithfulness. It is the way of Ali and Ali is all about loyalty and hard work.

This Sacred Zawiyah is based on three things:

- 1- Qur'an
- 2- Authentic Prophetic Sunnah
- 3- The Itra (the 5 Ahlul Kisa')

Then your pledge, loyalty, relentless work and faithfulness to the three principles above and to the living Shaykh of the Zawiyah (Allah Ta'ala protect and bless him).

Our Tariqah is NOT based on the 12 Imam theories, nor the theories attributed to Ibn Arabi and modern perennialists, rather it is an school based on the Manhaj of the Salaf of Ahlul Bayt, only AFTER the Qur'an and Authentic PROPHETIC Sunnah

This is Exhibit E referred to in the
Affidavit of Abraham Hussain
Sworn before me this 21st
day of November 20 18

Booddequi

COMMISSIONER, ETC.

From: M N <mymysna@gmail.com>

Date: February 26, 2014 at 5:07:55 PM EST

To: tasleema.allie@gmail.com, abd al-rasheed brown <ar2brown@gmail.com>, mogammad.noordien@gmail.com, mohamed carloo <carlom777@gmail.com>, ahmedtahier mohamed <imamtahier@gmail.com>, angel786 <angel786@telkomsa.net>, zeenat gaibee <zeenatgaibee@gmail.com>, nmally@gmail.com, Aeysha <aeysha.e@gmail.com>, Arshad Mahmood <itb075@hotmail.com>, Ibrahim Hussain <shaykhhusainchishti@hotmail.co.uk>, omarsabsabi@gmail.com

Cc: MK <mk@mkholdings.co.za>

Subject: Re: Shaykh Ismail Londt

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Bismillah

Wa Alaykum Assalam wa rahmatullahi wa barakatuhu dear Tasleema;

I pray that you and your loved ones are in the best of Iman, Ihsan, and Health.

For all members and affiliates with the Sacred Alawi Husayni Ninowi Zawiya, Planet Mercy, and Madina Institute, I thought that this was already made clear during my last visit to Cape Town. However, it seems that it requires further clarification. So I seek Allah Ta'ala's help to summarize it herein:

No permission for Madina Institute and its related activities in any way, shape or form to use Ismail Londt in our activities or courses, whether in his capacity as a Quarie (reciter), Munshid (singer) or any other capacity. No such professional engagement can be established on any level, under any circumstances.

The same applies for Planet Mercy and its related activities.

This is even more emphasized for our Sacred Zawiya and the Path of Tasawuf. I thought it was made clear that the said individual (Allah Ta'ala guide him and us) is no longer a part of our family. While there is no need to cite the variant different versions he gave for his detachment from the Sacred Zawiya, but that by itself suffices. The Tariqah is honoring and requires no human being now to honor it. My directions were clear during the last visit to Cape Town at AlQuds Masjid: Avoid the brother and give him his space. Giving him his space does NOT mean

that you allow him (being in turmoil, under pressure, confused, etc...as he described himself) to train our people to sing let alone anything else. Tasawuff is character in the first place. Tasawuff is not about the singing as much as it is about the values and principles embodied, learnt, and upheld through a lifelong process called Tarbiyah. People have to had been trained (Tarbiyah) in order to talk about it, let alone give it. Last I heard is that he kicked out our Zawiyah from the Masjid in which our Zawiyah established the Dhikr, and appointed himself to do Dhikrs, etc...that he learnt mostly from us. Khayr.

In Tasawuff, we have an ancient tradition revolving around a few qualities such people of faith and faithfulness. Treachery is not tolerated, and the pledge to Allah Ta'ala is costly for those who know. Those who don't have a bigger problem to deal with. A man's or woman's word is their bond and determines their worth; let alone their Allah-sworn pledge.

Allah Ta'ala said:

الذين ينقضون عهد الله من بعد ميثاقه ويقطعون ما امر الله به ان يوصل ويفسدون في الارض اولئك هم الخاسرون

Those who break the pledge to Allah after ratifying it, and sever that which Allah ordered to be joined, and make mischief in the earth: Those are they who are the losers. Al-Baqara 27

Allah Ta'ala also said:

ان الذين يبايعونك انما يبايعون الله يد الله فوق ايديهم فمن نكث فانما ينكث على نفسه ومن اوفى بما عاهد عليه الله فسيؤتيه اجرا عظيما

Lo! those who swear allegiance unto thee (Muhammad), swear allegiance only unto Allah. The YAD of Allah is above their hands. So whosoever breaks his oath, breaks it only to his soul's hurt; while whosoever keeps his covenant with Allah, on him will He bestow immense reward.

The above is the verse read upon initiating of every Murid after the pledge is recited. While there is no annulment of the pledge, but the Sufi' masters before have used the term exclusion then expulsion. We believe expulsion may have serious consequences, so we leave it at this point with exclusion. That means cut any and all relations.

Sayyiduna and the direct Master of our Path Amir-ul-Mu'minin Ali (Radiya'Allahu anhu) used to say: " associating with people whose hearts are diseased is harmful on one's heart".

Also Sayyidina and our grandfather in the Path Ja'far bin Muhammad As-Sadeq (radiya'Allahu Anhu) said:

قتعنا بنا عن كل من لا يريدنا * وإن حسنت أوصافه و نعوته
فمن جاءنا يا مرحبا بمجيئه * يجد عندنا ودا قديما ثبوته
ومن صد عنا حسبه الصد والقلی * ومن فائنا يكفيه أنا نفوت

Which means: "We are satisfied with ourselves regardless of those who don't like us, even if they are described with good characters and attributes. So whosoever comes to us; welcome we say to him, for he will find with us a noble character of love that is ancient within us. And he who abandon us, then that is enough punishment for him, and who bypasses us, sufficient that we bypassed him".

The Zawiyah and the ways of the Sufi's of Ahlul Bayt are not a joke or a game, or custom fit for ignorants to play with. We are connected to the noblest of lines, spiritual and academic. All others will learn from that line, and the line will not see others. Even if others don't admit it. But this is the Sunnah of the universe. I have been spoken to by Sayyidina Ali (radiya'Allahu anhu) himself directly and Imam Hasan as well, among others of our physical and spiritual ancestors. On that basis, our Zawiyah moves and turns from now till the end of times when we meet them in person. The mission is revival of the Ummah by bringing it back to the Book and authentic Sunnah in the way of Sufism that is based on Daleel and the ways of the great Sufi's of Ahlul Bayt, such as Imam Ali, Imam Hasan, Imam Husayn, Imam Zaynul Abidin, Imam Zayd, Imam Isa, Imam Yahya, Imam Muhammad, Imam Ja'far, Imam Musa, Imam Abdullah, Imam Al-Abed, Imam Ad-Dharir, and the like. May Allah's blessings and peace be unto them always, and us with them.

For people who belong to our Sacred Zawiyah (may Allah Ta'ala sanctify its secrets and raise its flags) and the way of the Sufi's of Ahlul Bayt, we expect them to take the honor of walking the path to Allah Ta'ala, for Allah Ta'ala and with Allah Ta'ala, fulfill their pledge and serve the Deen. Serving it by learning it first and then by applying the principles and embodying great values such as faithfulness, transparency, loyalty, frankness, clarity, truthfulness, trustworthiness, nobility, and other great Prophetic characters.

To be clear once more: NO PERMISSION is granted under any circumstances and for any reason to join this brother's Dhikrs, training, or teachings.

Now, I understand that some people have long standing friendship with this brother. That is a personal matter. However, the Zawiyah is a Dawah project, not a personal one. It is walking on

an ancient path that is well-travelled.

Students of MI or our Zawiyah who need to learn the Qur'an recitation are not permitted to go to the brother. For there are plenty of very qualified reciters with great characters such as Haroon Moos, who is willing and capable. That is for those who seek teachers out of the Tariqah, for I know we have a few good Shuyukh within us who are top reciters and some have their own institutes for that.

The last thing I want to get involved in is your local politics there. But I think it is important to draw the line, and indicate that MI students who get involved in such politics will risk final dismissal from our MI program.

Also MI students should be signing a confidentiality agreement with MI, whereby they acknowledge that info taught and disseminated at MI is not shared with others. They will at least be left to face it with Allah Ta'ala.

This is strictly confidential to those receiving it. Also it is not a personal judgment of Ismail Londt nor it should mean anything other than professional conduct for our Zawiyah and Institute activities. The hearts belong to Allah Ta'ala, he switches them the way He wants. Yet the teaching and leadership is for the Asil (purity in faithfulness and transparency), as the Sufi's used to say. Asil can give Asalah (transparency). That doesn't say that even an Asil may fall. Anyone after the Prophets, alayhem assalam, can fall. But we have a mission with a dollar short and a day late, and we need to deliver the message to humanity, we have no time to waste. Those who don't have that kind of sharp mission-driven understanding, can always marginalize themselves actually rather than mentally. In order for the ship to sail faster, it has to be lean and accurate, and not waste time.

For those with weak Iman and weak knowledge of the Seerah, such things maybe trials for you to see whether it is people of Allah Ta'ala you are working for.

May Allah Ta'ala be with all of you and bless you all and increase you to carry the noblest of messages to humanity.

I wish you all the most blessed of days, and the focus on the mission and the love of Allah Ta'ala and His Beloved, and the Awliya of the Allah Ta'ala, may Allah Ta'ala make you all among them. Amin.

Wassalam

mhmd

On Wed, Feb 26, 2014 at 3:16 PM, <tasleema.allie@gmail.com> wrote:

As Salaamu Alaykum wa Ragmatullahi wa Barakatuhu

I pray that Shaykh is in the best of health and well being insha Allah. Need I say we missing Shaykh loads and counting the days to Shaykhs return insha Allah.

Shaykh I kindly write with a little concern and confusion that needs your wise guidance and directive insha Allah.

Alhumdulillah we are all well but some sensitivity as to handling ourselves with the absence of Shaykh Ismail Londt is rife and requires a bit more clarity, with special guidance on whether Shaykh grants us permission to do the following:

1. Are we allowed to attend and promote the Majlis of Shaykh Ismail Londt at Auwal Masjid every thursda
2. Is Shaykh Ismail Londt allowed to train, teach or advise us
3. The ladies have been practising and advancing well in the ladies dhikr and nasheed program. Sister Bahia has met with Shaykh Ismail Londt that indicates he trains and teaches his Jamaah at Auwal on a Sunday. Sister Bahia has asked him if it would be possible for us ladies to attend and he has agreed.

Lots of our family are close and have a relationship with Shaykh Ismail Londt.

Kindly awaiting Shaykhs guidance

Much heartfelt duas
Mas Salama

Tasleema Allie
0747859147

Sent via my BlackBerry from Vodacom - let your email find you!

This is Exhibit F referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 20 18

Beddiqui

COMMISSIONER, ETC.

From: <asad@deanandassociates.ca>

Date: November 1, 2018 at 2:21:00 PM EDT

To: "Fatima Hussain" <fatima.amin786@gmail.com>

Subject: RE: Fatima Amin-Hussain MPC

Salam Dear Fatima,

I wish you the best of luck in the future. Let me know what is required for your new accountant to assist in the transition. We will cooperate fully.

I know this much that you have been very sincere in the support of this project and I stepped out based on what I predicted was going to be a financial nightmare. I also was increasingly not comfortable with the cultish environment.

Thanks,

Asad Dean, CPA, CMA

Dean & Associates Accounting

2550 Argentia Road, Suite 215

Mississauga, ON L5N 5R1

C: 647-273-3094

F: 905-247-0338

This is Exhibit G referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 2018

Saddiqui

COMMISSIONER, ETC.



"I have been warned by Sheikh
Ahlam about this woman
and she is a mureeda. I have
warned you about her and she
is still trying to slander him."

Ahlam

Salaam Sheikh Ibrahim , I got permission from Sheikh Ninowy to warn you about a fromer mureeda who has authu billah slandering our beloved Sheikh Ninowy

3:02 AM

She personally message me to slander him and she has been posting stuff on her facebook accusing sheikh of "spiritually abusing" her and taking advantage of her

3:03 AM

Her name is Karla and she recently left the tariqah and now started an organization for new and was told by Sheikh she is soliciting money for it

3:04 AM

Please help me warn who you know on a personal level as adviced by sheikh.

3:05 AM

I also heard she tried to slander him to a mureed in the uk so if we can reach out to as many as mureeds



This is Exhibit H referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 20 18

Siddiqui

COMMISSIONER, ETC.





Madina Seminary Directors

Ahmed, Dr Adam, Ibrahim, Imtithal, Muhamma...

Dec 8, 2016

As salaam alaykum. I'm at the hospital with Ibrahim getting him some IV fluids. He kind of decompensated and became dehydrated, just from decreased oral intake. No eating or drinking due to lack of time and stress. Please pray for his recovery.

9:47 AM ✓✓



9:48 A



Imtithal Mohammed





Madina Seminary Directors

Ahmed, Dr Adam, Ibrahim, Imtithal, Muhamma...

Imtithal Mohammed

Khair InshAllah 9:50 AM

May Allah help you recover soon Sh Ibrahim 9:50 AM

It's all the stress... may Allah reward you. 9:50 AM

Yes inshaAllah he will be fine, it's just that he has a habit of not eating or drinking anything when hrs stressed 9:52 AM ✓✓

Imtithal Mohammed
Adam does the same...goes for hours without eating. 😊 9:52 AM

Khair InshAllah 9:53 AM

Yes I felt I had to take him to the hospital when he couldn't even stand up 9:53 AM ✓✓

Imtithal Mohammed
Oh no .. please take care Sh Ibrahim





Madina Seminary Directors

Ahmed, Dr Adam, Ibrahim, Imtithal, Muhamma...

ourselves because we are all in positions where we are constantly helping and taking care of others and end up making ourselves depleted.

12:17 PM ✓✓

Dr Adam

Please take the time to look after your own health and wellbeing. To be helpful to others you need to look after your self. I noticed that you don't well. It is essential that you eat, sleep and rest. I know it is not easy with all the tasks at hand but it is critical you do this for the sake of your family, the community.

12:30 PM

You need to eat regularly

12:31 PM

Ibrahim Hussain

Will do thanks.

12:32 PM

JazakAllah for your advice Dr Adam



12:39 PM ✓✓

Dec 9, 2016



This is Exhibit I referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 2nd
day of November 2018

Siddiqui

COMMISSIONER, ETC.



Office: 2388 Speakman Drive, Mississauga
Ontario, Canada L5K 1S4
Phone: 905-822-2222
Email: info@madinaseminary.ca
Website: www.madinaseminary.ca

Sunday January 3rd, 2016

Madina Seminary Meeting minutes

Meeting Location: Madina Seminary Board Room

Attendees: Shaykh Dr. Nino, Shaykh
Ibrahim Hussain, Ahmed Raza Yousuf, Dr. Adam Mohamed, Dr.
Fatima Amin-Hussain.

Guest: Shaykh Issa Nino

Items discussed:

1. Ismail Jasat's loan repayment was discussed. All Canadian directors agreed to contribute their share towards his loan repayment.
2. Ahmed Raza Yousuf passed a motion to include Shaykh Ibrahim Hussain in the board officially as a member. Shaykh Dr. Nino seconded the motion and commented that his title should be, "Imam and Executive director". All directors raised their hands and welcomed and approved his addition to the board as a member.
3. The organizational bylaws draft sent by Naseer Syed, our charity lawyer were reviewed by everyone and were approved by all with one change that everyone agreed on.

Dr. Adam Mohamed
Secretary

This is Exhibit 5 referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 2018

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Government
of CanadaGouvernement
du Canada[Home](#) → [Canada Revenue Agency](#)→ [Charities and giving](#) → [Charities Listings](#)→ [Search](#)

Directors/trustees and like officials — Madina Seminary

5 Directors/trustees and like officials

Registered charities that notice problems with their online information should go to [How to amend the return](#).

Director/trustee and like official #1

Full name: **Fatima Amin-Hussain**



Full name: **Fatima Amin-Hussain**

Director/trustee/like officials term:

Start Date: 2016-08-01

End Date:

Position: President

At arm's length with other Directors, etc.?:

Yes

Director/trustee and like official #2

Full name: **Ibrahim Hussain**

Director/trustee/like officials term:

Start Date: 2016-08-01

End Date:

Position: Iman & Executive Director

At arm's length with other Directors, etc.?:

Yes

Director/trustee and like official #3

Full name: **Adam Mohammed**

Director/trustee/like officials term:

Start Date: 2016-08-01

End Date:

Position: Secretary

At arm's length with other Directors, etc.?:

Yes

Director/trustee/like officials term:

Start Date: 2016-08-01

End Date:

Position: Secretary

At arm's length with other Directors, etc.?:

Yes

Director/trustee and like official #4

Full name: **Muhammad Nino**

Director/trustee/like officials term:

Start Date: 2016-08-01

End Date: 1970-01-01

Position: Cheif Religious Official

At arm's length with other Directors, etc.?:

Yes

Director/trustee and like official #5

Full name: **Ahmed R Yousuf**

Director/trustee/like officials term:

Start Date: 2016-08-01

End Date:

Position: Treasurer

At arm's length with other Directors, etc.?:

Yes

This is Exhibit K referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 2018

Seadequi

NOTARY PUBLIC, ETC.

Monday, July 30th 2018

Madina Seminary Directors and Members Meeting minutes

Meeting Location: Madina Seminary Board Room

Attendees: Shaykh Dr. Muhammad Nino, Shaykh Ibrahim Hussain, Ahmed Raza Yousuf, Dr. Adam Mohamed, Dr. Fatima Amin-Hussain.

Four volunteers of Madina Seminary, including one volunteer who is under eighteen years of age and many spiritual disciples of Shaykh Dr. Nino and one real estate lawyer named Mark Lathem were invited to the meeting and were seated in the board room without prior written or verbal consent of the directors and members. I politely explained to all of them that they should be not present in this meeting and they all left after understanding that this was a board meeting for directors & members of Madina Seminary as agreed by everyone. Shaykh Dr. Nino himself chaired the meeting without nominating a chair, whereas as per our bylaws the President must chair all meetings as we do not have an appointed chair in the board. The agenda that was agreed upon in the email was not followed instead Shaykh Dr. Nino and Ahmed discussed non agenda items for one hour.

Items discussed:

1. Why the resolution for listing the campus for sale was passed in order to avoid liquidation and power of sale after written threats from creditors. How the resolution was passed after months of opposition of agreeing to sell the building and how Madina's legal counsel advised on understanding the consequences of liquidation and power of sale. Ahmed and Dr. Nino stated that Mr. Naseer (Irfan) Syed is not organizations legal counsel but

they were reminded that he is our legal counsel as we passed a unanimous resolution to retain him as our legal counsel before we retained him to file our charitable application since he was

they were reminded that he is our legal counsel as we passed a unanimous resolution to retain him as our legal counsel before we retained him to file our charitable application, since he was very experienced in charitable law.

2. The membership of Shaykh Ibrahim Hussain was discussed and Ahmed and Dr. Nino said they could not remember him being added as a member and they both stated that it seemed to be a conflict of interest with his wife, Dr. Fatima Amin-Hussain being the president. Shaykh Ibrahim reminded them that he was added on January 3rd 2016 by a motion and unanimous vote of directors and members and he also explained how our legal counsel also confirmed his membership and how this was documented.
3. The debt of \$1,625,400 was discussed and Ahmed stated that he had spoken to Thomas Randall Shaw's lawyer and Munir Subhani's wife and that he had received more time to repay these loans. Ibrahim reminded the board that every single creditor had asked for the return of their loans this Ramadan. Dr. Nino then talked about monthly operating costs and he stated that they were \$15,000 per month. Shaykh Ibrahim reminded the entire board that our interest and principal payment alone was \$20,500 per month and after calculating gas, hydro, internet, telephone, water and lawn maintenance costs and the Imam and teacher salary, the monthly operating costs were \$31,000 per month and only \$6,000 per month was being received in fees and donations leaving a shortfall of \$25,000 per month. Dr. Nino asked Shaykh Ibrahim and Dr. Fatima about what they would do going forward as he stated that was working on replacing directors who believe that the building must be sold to avoid liquidation. He stated that he had spoken to some people in Malaysia such as a female who he asked to contribute \$600,000 to become director and someone

else. Dr. Fatima and Shaykh Ibrahim said that they would obtain independent legal advice as advised by Madina's legal counsel during his email on July 23rd to the board. I was also asked by Dr. Nino and I said that I would consult with my wife about this.

Done Madina Seminary meeting min...



else. Dr. Fatima and Shaykh Ibrahim said that they would obtain independent legal advice as advised by Madina's legal counsel during his email on July 23rd to the board. I was also asked by Dr. Nino and I said that I would consult with my wife about this.

The meeting had to pause for a prayer break. After the prayers we were standing outside and Dr. Nino asked for forgiveness from myself and Shaykh Ibrahim and Dr. Fatima from his statements leading to this meeting. Ahmed asked for the listing to be removed to which Shaykh Ibrahim stated that until there was no clear evidence such as proof of funds for returning funds to the creditors, the listing should remain as the listing was placed not by him but after a consensus of the majority of members/directors to avoid liquidation. Ahmed promised that he would pay Thomas Randall Shaw, Mimir Subhani within one week and that he would immediately speak with Nelson Da Silva of Harbour Mortgage Corp. Shaykh Ibrahim and Dr. Fatima told the board that due to religious reasons and in accordance to the Quranic principle they no longer wanted to act as guarantors. Dr. Nino asked for three weeks so he could try to get funds from abroad. Dr. Fatima insisted that we don't have time and must avoid liquidation! I asked for a proper plan to be presented by Ahmed and Dr. Nino that would clearly outline how we could avoid liquidation.

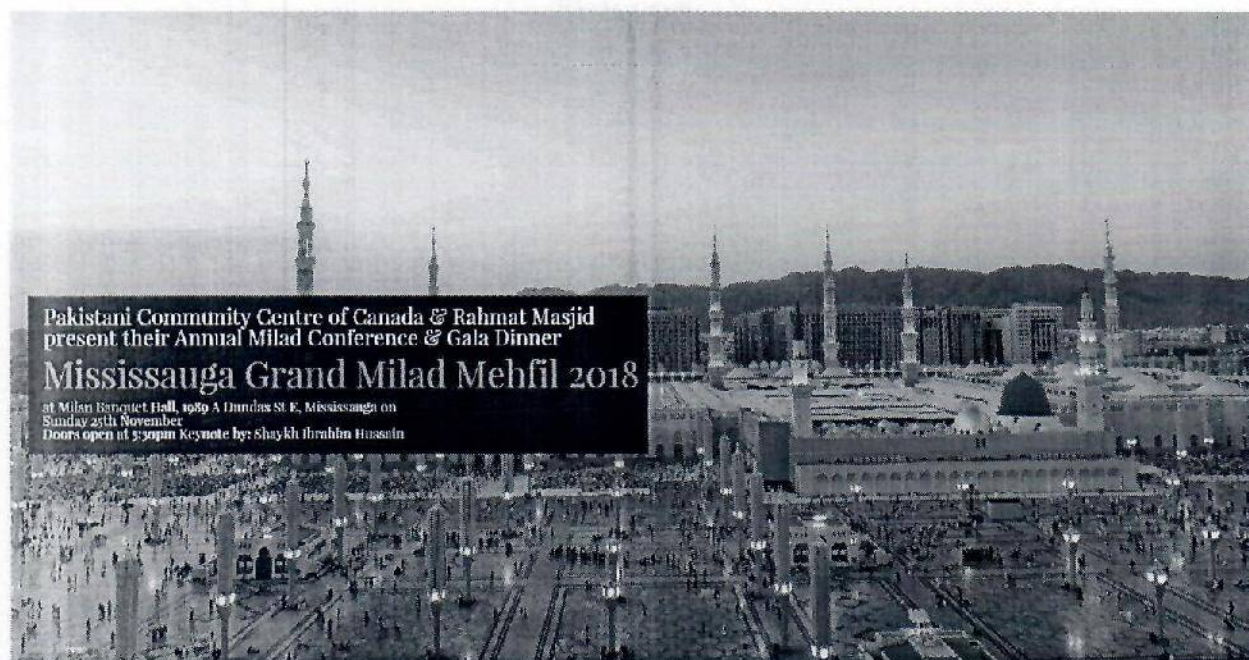
Dr. Adam Mohamed
Secretary



This is Exhibit L referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 2018

Siddiqui

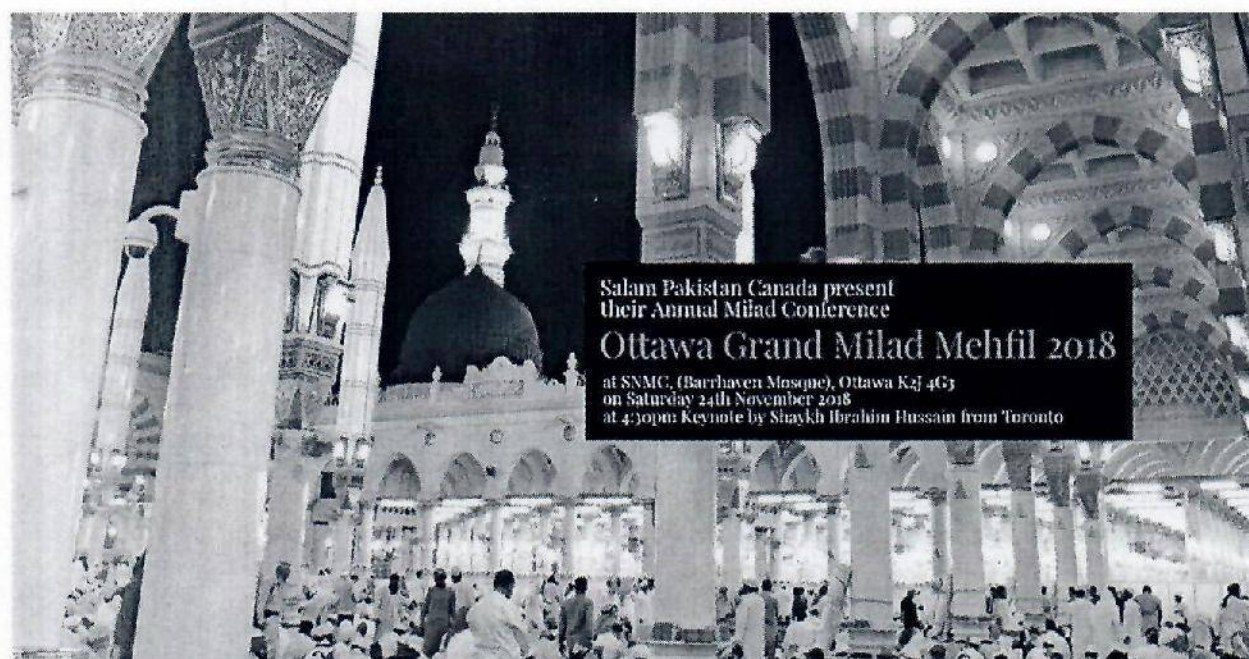
COMMISSIONER, ETC.



Pakistani Community Centre of Canada & Rahmat Masjid
present their Annual Milad Conference & Gala Dinner

Mississauga Grand Milad Mehfil 2018

at Milan Banquet Hall, 1060 A Dundas St. E, Mississauga on
Sunday 25th November
Doors open at 5:30pm Keynote by: Shaykh Ibrahim Hussain



Salam Pakistan Canada present
their Annual Milad Conference

Ottawa Grand Milad Mehfil 2018

at SNMC, (Barrhaven Mosque), Ottawa K2J 4G3
on Saturday 24th November 2018
at 4:30pm Keynote by Shaykh Ibrahim Hussain from Toronto



Rahe Salook International

In Collaboration with MCCM Request you with family and friends
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Saturday October 13, 2018 at 5:00 P.M

AT

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Keynote Speaker
Shaykh Ibrahim Hussain Chishti



Naat Khwan
Afzaal Qadri and others

Quiz about Karbala. (Prizes will be distributed)

For more information and RSVP please contact

Mazhar Butt (905) 462 4409
Ghulam Sarwar (905) 749 3330
Talat Mahmood (416) 828 6760
E-mail: rahe_salook@yahoo.ca

This is Exhibit M referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 2018

Bohdigui

COMMISSIONER, ETC.

Done Ltr Madina Seminary August 1...



Shahid Siddiqui
Managing Partner, Abrahams LLP
305 Silver Star Boulevard, Suite 215
Toronto, Ontario M1V 0E3
T: (416) 293-6788
F: (416) 293-8764

August 19th, 2018

Madina Seminary
2380 Speakman Dr.
Mississauga, Ontario
L5K 1B4

Attention: Muhammad b. Yahya al-Ninowy (Muhammad Nino) & Ahmed Raza Yousuf

Re: Letter of Dissent regarding Actions Taken by Madina Seminary Directors

Please be advised that we have been consulted by Dr. Fatima Amin-Hussain ("Dr. Amin-Hussain") regarding the above-noted matter.

Dr. Amin-Hussain, President of Madina Seminary, dissents to the following actions and decisions carried out by Madina Seminary directors, Muhammad Nino ("Mr. Nino") and Ahmed Raza Yousuf ("Mr. Yousuf"):

1. Zoning violation: Dr. Amin-Hussain opposes the current zoning violation occurring at Madina Seminary (the "Seminary") located at 2380 Speakman Drive in Mississauga. As per the zoning certificate, the Seminary is "not approved as a place of religious assembly." Therefore, the 5 daily congregational prayers, Eid prayers, and Friday prayers currently held at the Seminary must cease immediately. For congregational prayers, attendees can go to ISNA mosque which is properly zoned as a place of worship and only two minutes away from the Seminary.

Further, any promoting and marketing of the Seminary and its activities as "mosque" activities, through print, online media or otherwise, should cease immediately. Mr. Nino and Mr. Yousuf have stated repeatedly, verbally and in writing, that the Seminary is a "mosque" and "cannot be sold except to a mosque."

Dr. Amin-Hussain does not condone conducting activities in the Seminary which are in violation of its permitted use; the goal of establishing and operating a mosque without proper zoning is unlawful. These views are clearly reflected in Dr. Amin-Hussain's email to the Board of Directors dated August 20, 2017.

2. Debt crisis: Our client maintains that Mr. Yousuf and Mr. Nino are forcing the charity into liquidation by opposing the sale of the building. Furthermore, they have no real financial solutions to the Seminary's debt crisis. Rather, they are "buying time" for

loan repayments to creditors, which only worsens the Seminary's debt and leaves ongoing threats of liquidation from creditors, who are furious.



Done Ltr Madina Seminary August 1...



charity into liquidation by opposing the sale of the building. Furthermore, they have no real financial solutions to the Seminary's debt crisis. Rather, they are "buying time" for

loan repayments to creditors, which only worsens the Seminary's debt and leaves ongoing threats of liquidation from creditors, who are furious.

Dr. Amin-Hussain is in favour of selling the building to a neighbouring Muslim organization, Olive Grove School ("OGS"). OGS can use the entire space of the building to its fullest and establish a school that will benefit Muslim children. In contrast, the Seminary has been occupying a building that is too big for its purposes. Recently, OGS has sent an offer for \$4.75 million; however, Mr. Nino and Mr. Yousuf have maintained that they have no interest in selling or even listing the building for sale, despite the urgent debt crisis.

By disagreeing to sell and relocate to a more sustainable building, Mr. Nino and Mr. Yousuf are wrongly dismissing a real solution to the debt crisis. Every day that goes by in the current building increases the Seminary's debt. Their denial of the seriousness of the debt crisis is wholly detrimental to Madina Seminary.

3. Imam's resignation: Dr. Amin-Hussain dissents to Mr. Nino's oppression of the Seminary's former Imam and Executive Director, Shaykh Ibrahim. Since 2013, Shaykh Ibrahim worked tirelessly, day and night, to build the organization. His efforts were completely discredited by Mr. Nino and ultimately, this led to his resignation. There are grave community concerns regarding the events that led to Shaykh Ibrahim's resignation, as he is well-respected by the community.

4. Defamation: Dr. Amin-Hussain strongly dissents to the circulation of a memo, sent through WhatsApp on August 12, 2018, to the disciples of Mr. Nino which uses derogatory forms of address, among other types of slander, against her character. The problematic statement was apparently written on Mr. Nino's instructions. This memo has been circulated domestically and internationally. This defamation and misrepresentation has harmed Dr. Amin-Hussain and the Seminary alike. Dr. Amin-Hussain strongly opposes this offensive act and will be taking strong legal action further to the enclosed defamation notice.

Finally, Dr. Amin-Hussain will not be attending the meeting scheduled for this weekend or tomorrow morning, will be commencing formal legal proceedings and urges the board to stop the zoning violation and refrain from causing further financial distress to the Seminary and its community. Please note that all further communications should be through our office, as we are representing Dr. Amin-Hussain as independent counsel.

Yours truly,
Abrahams LLP

Shahzad Siddiqui

Per: Shahzad Siddiqui



This is Exhibit N referred to in the
Affidavit of Abraham Hirschman
Sworn before me this 21st
day of November 2018

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COMMISSIONER, ETC.

• Bismillah.

> Salam everyone,

▶

> Here is the chronology of things:

2. During Ramadan he managed to get another trustee to agree with him. Madina Canada has 4 trustees (The Shaykh, an entree doctor named Adam, Dr. Fatima (Ibrahim's wife) and Ahmad (Pakistani businessman)).

and within a year or so it would be paid off.

3 years down the line, no significant effort was put much in terms of outreach and Dawah. In January 2018, the board agreed to hire an Imam for Jamaah and Jama'ah, since Ibrahim was not committed in this way. He was still committed to the project, as a manager not as an imam.

> - In an AMBUSH move, immediately right after Ramadan, Ibrahim added himself to the board of directors (trustee's) as a member, illegally too, and with that he, his wife and the other Ebrean brother made a motion to sell Madina Canada. (file attached). Ambushing the other directors (the Shaykh and Ahmad). The Shaykh was on a long tour overseas after Eid till July 26. July 28 is when he returned to Canada to sit on a meeting on July 30.

* In the meeting on July 30th, Ibrahim, his wife, the Eritrean brother, the Shaykh and Ahmad were present. The Shaykh had already invited the public to sit on the board meeting, and Ahmad had invited his lawyer that he retained. Ibrahim, his wife, and Adam, all refused to speak in front of the public, and threatened to leave the meeting if (the Shaykh and Ahmad) insist on them being present. All public, volunteers and Ahmad's lawyer were asked to leave.

* - The meeting talked about the moves taken, and everyone spoke, and the Shaykh spoke. They (Ibrahim, wife, and Adam) said they want to see a plan first and said that they don't want to continue with the project.

g - Based on the illegal motion of Sale of Madina by all three of them, Ibrahim went to major donors with Qarza Hasna, and made an urgent case to them to file legal notices through lawyers to file a claim against Madina. Those donors didn't have that kind of urgency or method in mind before the motion was sent to the Real Estate company and the property was listed for sale.

> - The Shaykh reminded Ibrahim and the rest (and the audio is all recorded) that it was Ibrahim and Ahmad who insisted on this property and insisted on getting it financed thinking its a year or so before it gets paid off. They were the ones insisting on this property specifically too. The Shaykh reminded them that he only agreed after all board members were fully determined.

10. - In the July 30th meeting, they agreed to meet again in a week and in 3 weeks. That if Ahmad settles with the mortgage company (whom Ibrahim had already contacted with the Sale of property motion asking for a payoff amount) thus collapsing their confidence in continuing financing Madina, and if he settles the other 3 outstanding legal notices (also elicited by the sale motion of Ibrahim) and make the payment alone, then they would discuss a possibility of re-visiting the viability of the project again by February 2019, and then make a final decision. This is how the meeting ended.

• Yesterday, Ibrahim went on public (for the second time after his meeting with the volunteers at Madina a week ago) to announce his resignation, but also to engrave a slander and present total lie against the Shaykh and the other trustee. The reason it is slander is because he is trying to present himself as the balanced character pushing for the Qur'anic view of Riba. He did not say that this was his idea 3 years ago, and that he was pleasantly doing it until last Ramadan (8 weeks ago) after the altercation about the Washrooms building at Madina with Ahmad, then the Shaykh issuing an ultimatum to Ibrahim.

10. This is for your information only. Because things may go very legal, as Ahmad has been preparing legal action on a host of things due to Ibrahim and his team issuing a couple of illegal motions on behalf of Medina unilaterally and refusing to be contacted for almost 7 weeks. Please do not take this into your own hands, do not issue anything on behalf of Medina. You may engage with Ibrahim if he engages you. But to be honest, the best now is to ignore him, and beseech Allah Ta'ala's help. While I removed Ibrahim from this group, he remains as per the Shaykh's instructions as part of the Tarifah group, as his pledge to Allah is always there and he would have to answer for it.

3

- Reasons for this 180 degree flip: unknown really. It is possible that the altercation between him and Ahmad, and the competition between them has led to Ibrahim taking the ship down to teach all a lesson that he is indispensable or whatever. It is possible that he wants his money or his wife's money. He doesn't work, but his wife is a medical doctor and she over the last years contributed about \$500K USD to the project. The money cannot be retrieved, but if the Masjid is sold, then they can all take their money back. Or other things that we don't really know."

✓

• Ibrahim Hussain

This is Exhibit 0 referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 2018

Siddique

COMMISSIONER, ETC.

From: **Ahmed Raza Yousuf** <ahmed@bayinternational.ca>

Date: Fri, Jun 8, 2018 at 7:01 PM

Subject: Important Matters

To: Ibrahim Hussain <shaykhibrahim@madinaseminary.ca>, Fatima Hussain

<fatima.amin786@gmail.com>, <adamhamde@gmail.com>, Sayyidi Shaykh Muhammad bin Yahya
<mymsna@gmail.com>

Assalamwalekum,

Firstly I appreciate everyone being honest and upfront about their feelings and views. I believe that we always have to be honest with ourselves first in order to be successful.

My concern mainly was that how can a group make a decision without calling a meeting or informing the other member of the concerns? specially about something on going and the allegations proposed so severe. You could've easily called me or emailed me and requested the invoices for the work done and I would've just emailed them to you. I never knew that the directors found no need of washrooms or they were concerned about money being spent on it. Calling it a disaster is a very insulting thing to say to the efforts of the people involved in making this wudu area and washroom. Including donors, (whom you asked money from for washroom) people working with their hands and people who are managing it. I will reply to everything point by point below and InshAllah I am sure that your concerns will be eased. I am the designated Treasurer for this organization and it is my responsibility to keep records of all the money coming in and out of the account so I have no issues with anyone asking for invoices and you mentioning transparency obviously highlights that I am not transparent without even asking me for anything you decide to pass on judgements.

Please see my answers below point by point.

1. *I gave Tayab one cheque for \$5,000, another for \$5,850 those cheques were for material that me and our Madina team members are yet to see at Madina and it's been over 15 days since I co-signed the cheque along with you in good faith. I also co-signed a cheque for him for some engineering regarding the permit and it's June and we have never received a update on that from your self or him and I need to see that invoice also. After not seeing any progress, any material and not having clarity, myself, Fatima, Adam and all our core team members have agreed that we no longer need this washroom especially since Tayab asked Abubakr for a \$14,000 cheque yesterday and when Abubakr informed him that Ibrahim, Fatima, Adam will be hesitant to sign that cheque if the washrooms are not complete by Saturday, he replied, it's highly unlikely to be completed by Saturday and I will get it signed by someone else no matter what. And today he told Abubakr that he will call Shaykh Ninowy, who is currently sick. You yourself should have talked to me, fatima and Adam and shouldn't have wrote this on this group, but it seems this group is the only way we can communicate so Khayr. Me, Adam and Fatima and the core members of our organization do not want this washroom, neither do the worshippers after Ramadan, so thank you for trying. We needed the washrooms in Ramadan, after Ramadan it wasn't urgent, as compared to paying for utilities etc.*

Please find attached the invoices which were paid out of Madina Account. For clarification the same were handed to Abu Bakr as well. Also on your comment that worshippers do not need washrooms after Ramadan is very short sighted thing to say as wudu area and washrooms are not only used in Ramadan but all year round. Secondly who do you mean by the CORE members ? and where were they when we decided that we will be building the washroom ? Directors decided that we will proceed with the washrooms because we have promised our donors that we will be building them and you ahve done fundraising for it as well. The delays occurred due to one of the tradesmen not showing up and we did not want to overpay and keep the cost of the washrooms in control. If we are not diligent on spending then the budget goes all over the place. If you are too much worried about the costs of the washroom I suggest you should get some quotes yourself and check how much difference there is. It is not your expertise to judge between the costs so either you bring an expert to talk with me or just ask me.

2. *What we want is for all of us to stop ignoring the reality, that we can't manage and pay for this facility. We can't and no longer want to pay interest and thousands of dollars for gas/hydro, when using only a small corner of the building, as both riba and israf are haram. We no longer want to hear about pledges that are made with good intentions but don't come into fruition as they don't get us anywhere. The priorities now in Ramadan are.*

1. Paying off Ridwan \$225,000

2. Paying off Munir Subhani \$100,000. Please inform Mr Subhani that his loan will be paid by June 30th, 2018 inshAllah. I will make a deposit in Madina account and we will pay it out from there. Also we will take a receipt.

3. Paying off the loan that me and Fatima have given of \$665,000, as we can't afford to pay \$3,000+ monthly interest anymore that we have been paying, after refinancing our previously riba-free home, which we did to pay off Ismail Jasat. We have other loans that we need to return to people and we need the funds. We both also want to live the rest of our lives interest and debt free, and die in that state also.

4. Dr. Adam loaned us \$550,000 and he also needs breathing space as he has been struggling financially for a while and he told me this week that he can't even help his father and that is just not right and I know how that feels!

5. Samir Akhtar has to be repaid \$45,000 so him and his wife can buy a House.

6. Syeda Asma, Ahtisham's Sister wants her \$15,000 back so she can go to Hajj.

7. Syed Zaka wants his \$20k back as him and his wife have no income.

8. My brother in law needs his \$20,400 back so he can go to Hajj with his family.

9. My father in law asked for he \$20,000 back 10. We need to be an interest riba free masjid and institute if we want to be successful as it's haram and there are no ifs ands or buts when it comes to obeying Allah ta'ala and we don't need to talk Islam any further when we have our Shaykh.

11. You also have loaned us money that you probably need also, or you may not need it. I was getting legal advice for Madina about leans, as Subhani threatened to secure a charge on our property and the lawyer informed me that you already have a lean on the Speakman building that we didn't know about. Fatima and Adam don't have a lean for their loans, neither does Ridhwan.

I am surprised that you say that you did not know about this because you were dealing with Mr Balraj for TD bank mortgage and you and Mr Balraj spoke numerous times on this and came to conclusion that once Ismail Jassat loan gets paid off we can borrow against the lien on the property so we can get extra funds for Madina operations. Therefore Ismail Jassat loan was being replaced by mine otherwise I had no intentions to put it there. I spoke with Balraj after your comments and he told me clearly that you knew about it. Also you called Burhana to confirm because you did not remember and she called me. I even forgot about it myself because I thought it was needed at that time and I approved it. I will be instructing Burhana to remove it right away.

I also suggest that we pay off these qard e hasana from the fundraising we do on Saturday. We can decide which ones are urgent.

None of us intended to build a masjid out of Riba, but that's what ended up happening and the important thing is that we are wise enough to see this mistake and make the change to rectify our actions. We have to put aside our emotional attachment to this building as all things will perish!

As we can realize from the above, our priority is to be interest free and debt free this Ramadan, hence, we launched the Phase 2 campaign to raise \$3,500,000. During this blessed Ramadan what Allah ta'la has shown us is that sometimes we have to change ourselves and that's why me, fatima, Adam and our other core members(who are these core members ? please summon a meeting right after Ramadan of whomsoever you are reffering to) agree that we MUST sell this place, be interest free, pay off all Qarze hasana's and we can then purchase an interest free facility after making a proper 10 year plan and budget, but this time we will have cash in hand, therefore our plans will be realistic. The reality is we don't have the money, to operate in such a big size facility and we have to stop pretending like we do.

Finally, regarding the washroom, clearly It's not going be to ready in Ramadan and it was supposed to be ready by Laylatul Bara'ah, thereafter, you promised for it to be ready by 1st 10 days, then you said by May 30th and now it's June 7th. You promised that the washroom project was going to headed by you including arrangement of finances. Your blessed father made a pledge last year and it seems that you did not put a side funds towards it and we had to use the Madina account, when the Madina account is already burdened with high interest payments, high gas and electricity bills, Imams salary, hence we can not just dish out funds because we need to manage the cash flow, so we don't encounter another foreclosure episode and so our lights are not shut off again and so that our gas isn't cut off again like in the past.

The funds which were used by Madina will be deposited back in Madina. The washroom will be completed as I do not wish to stall something we started. The funds will be paid by me from future and we can do adjustments later

So Let's meet this Friday and agree as a group on the best move going forward for Madina before we drown further!

Please forget the washroom for now and please don't be offended as we just need to focus on the priorities and we all feel allah ta'la wants us to focus on the priorities so we can take our organization to the next level, where we are interest, debt free and when we don't have to always stress about finances and instead we can focus on Dawah.

Washroom had nothing to do with you or your priorities as it was not your responsibility in first place. You can keep your focus on Dawah. I take the blame for the delay but inshAllah it will be completed.

And Allah ta'la knows best.

Let's meet at Madina for Iftar this Friday.

Allah ta'la grant our Shaykh shifa and bless all of you for your hard work and efforts and good intentions and forgive and guide us all amin.

It must be noted that I have met with millionaires and begged them for this money \$3,500,000 but they are not giving it and are telling me that we need to sell, including Ismail Jasat and Ridhwan and others. We can not rely on pledges anyway. If anyone here knows anyone who wants to give us \$3,500,000 let me know so I can have our lawyer talk to him/her tomorrow or Monday and so that we can settle the matter in Ramadan, or else early next week we have to pass a resolution for the sale of the property to be interest and debt free, as everyday day in this facility is not affordable for us. If we don't proceed in the right direction we will be seeing legal notes again and that's not what we want to be seeing after Ramadan, as people are patient and compassionate in Ramadan but after Ramadan they will be coming after us.

Lastly I would like to say that please do not expect the community to just come in and Pay you \$3,500,000. It takes years to build reputation and respect. Our job is to serve and just serve. Our services should be reflected in our attendance. If we are not getting attendees then there is a issue with us that we are lacking services. How do we differentiate ourselves from other masajids if we only do prayers and Friday ? we need to ensure that we build bonds with whomsoever comes to masjid. They need to be respected and feel more inclusive. We need to work with people not for selfish reasons or for donations but also give them opportunity to serve Madina and welcome them. Our vision was always to serve the community in the best manner and offer services which other masajids do not. We are proudly offering our Usul Uddin program and there are many other services which can be done.

I always belived in our potential and each and every one of us. Allah has blessed us with Madina and people actually envy us for what we have. Sayyedi has always requested us to work with sincerity and give it all we got and be positive. InshAllah Allah will grants us success. We cant ask for donations while questioning the mission ourselves? Where is the intention leaning then ? How will Allah help us if our hearts are having doubts about the mission ? how can he put in someones heart to support this mission if we are having doubt ourselves?

I am glad that Maulana Ibrahim brought up all these issues which were in his mind and heart. We have discussed the option of selling many times and we all concluded that we will work hard to make Madina a success. If you feel differently now and would like to take a decision we shall make decisions when Sayyedi Shaykh is in Toronto. In the meantime lets focus on our tasks inshAllah and think everything through again. Lets see how we can make this project a success.

I apologize if I hurt anyones feelings and I apologize for the delay again but it was unfortunately out of my control. I will be paying off the remainder of the washroom expense myself and also deposit into Madina account the amount spent next week.

Ahmed Raza Yousuf

Bay International Inc.

350 Burnamthorphe Rd. West

Suite 215, Mississauga, ON, L5B 3J1

This is Exhibit P referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 2018

Biddiqui

COMMISSIONER, ETC.

Done Tax Receipt 20170311 - Fatim...



Address: 2380 Speakman Drive, Mississauga
Ontario, Canada L5K 1B4
Phone: (905) 822-2222
Email: info@madinaseminary.ca
Website: www.madinaseminary.ca

Dear Dr. Fatima Amin-Hussain,

Assalamu Alaykum! Thank you for your generous donation towards Madina Seminary!

Madina Seminary has been working to serve the community and we could not, and cannot continue to, do so without your support.

Your generosity will help us: renovate and sustain the Madina Seminary campus, establish and run the one year intensive Usul-ud-Din program in Canada, provide a centre for all Canadians with special focus on providing the youth with Muslim alternatives, providing women's programs catering to the needs of our community, training and educating home-grown Canadian Imams and Muslim scholars who can connect with the community, and much more.

Please find the tax receipt for your charitable donation below. May Allah reward you abundantly for your efforts in His way. We ask you to continue to affirm your support and assistance of Madina Seminary in the future.

Abu Huraira (RadhiAllahu 'anhu) reported Allah's Messenger ﷺ as saying:

"When a man dies, his acts come to an end, but three, recurring charity or knowledge (by which people) benefit, or a pious son, who prays for him (for the deceased)".
- [Sahih Muslim]

Sincerely,
Shaykh Ibrahim Hussain, Executive Director



Address: 2380 Speakman Drive, Mississauga
Ontario, Canada L5K 1B4
Phone: (905) 822-2222
Email: info@madinaseminary.ca
Website: www.madinaseminary.ca

Registration #: 84492 5032 RR0001

Eligible Amount: \$25,000

Donation Date: 11/03/2017

Donor Name: Dr. Fatima Amin-Hussain

Donor Address: 8 Miracle Trail, Brampton,
Ontario, L7A 0Y3

Authorized Signature:

Receipt #: 20170311

Thank you for your generous donation!

Issue Date: 11/03/2017

Location Issued:

Madina Seminary,
2380 Speakman Drive,
Mississauga, ON, L5K 1B4

Canada Revenue Agency
www.cra-arc.gc.ca/charitable/wrap



This is Exhibit Q referred to in the
Affidavit of Abraham Hussain
Sworn before me this 21st
day of November 2018

Seelakumar

COMMISSIONER, ETC.

ROGERS

9:11 AM



< Inbox



This message is from a mailing list.
Unsubscribe



From: Madina Mercy >

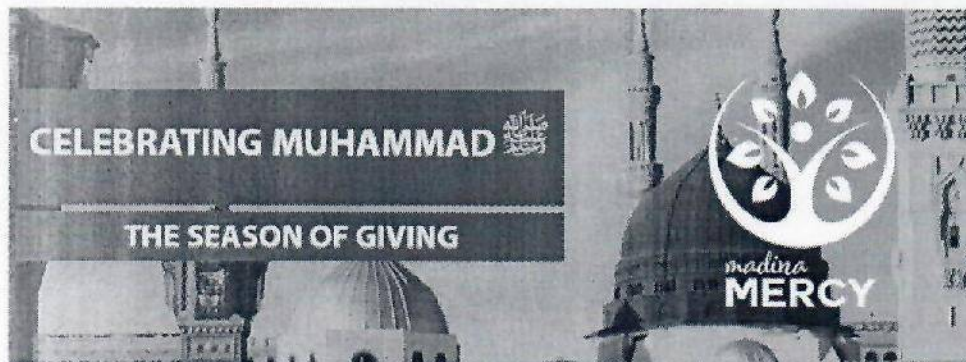
To: Ibrahim Hussain >

Hide



Celebrating Muhammad ﷺ: The
Season of Giving!

November 15, 2018 at 10:25 AM



< Inbox



Say, [O Muhammad], "If you should love Allah, then follow me, [so] Allah will love you..."

Quran [3:31]

This Rabi'ul Awal, lets resolve to strengthen our connection with Allah Ta'ala by following the footsteps of our beloved Prophet Muhammad ﷺ - Let's spread the Mohammadan Mercy!

**Let's Follow the Mercy to the Worlds -
Support our Campaign!**

Madina Mercy feeds the hungry and makes education affordable - giving a new chance at life to several hundred through its many global projects. Join the Madina family!

**Learn more about the powerful impact
of Global Mercy Initiatives that you
support!**



This is Exhibit R referred to in the
Affidavit of Ibrahim Hursain
Sworn before me this 21st
day of November 20 18

Siddiqui

COMMISSIONER, ETC.



Abu Ali Hashmi ► Tariqa Qadiria

Rifa'ia Shadhilia - الزاوية النينوية

الطريقة الشاذلية الرفاعية

September 15, 2015 · 📷



based on Suphia Meraj and UmmNoor Sidek request, I called Sayyidi Shaykh and asked him to give us the most important Hijri dates for the next 10 years. He just did, and here they are These dates are "Yaqini" = definitive. But again, use them for your own self and don't create a Fitna in your communities. He gave them with the day and date. So enjoy

Hijri Year 1437:

1st of Muharram: Wednesday 10/14/2015

Day of Ashura: Friday 10/23/2015

Day of Mawled: Wednesday 12/23/2015

1st of Rajab: Friday 04/08/2016

Day of Isra & Mi'raaj: Wednesday 05/04/2016

1st day of Sha'ban: Sunday 05/08/2016

1st day of Ramadan: Monday 06/06/2016

Day of Badr (17th Ramadan): Wednesday 06/22/2016

Eid -ul-Fitr (1st Shawwal): Wednesday 07/06/2016

1st of Dhil Hijjah: Saturday 09/03/2016

Day of Arafah (9th Dhil Hijjah): Sunday 09/11/2016

Eid-ul-Adha (Nahr): Monday 09/12/2016



Azam Jahangier

Uhm.. Can I ask something. Do the Awliya also know when big events will happen, like the emergence of Dajjal?

3y Like Reply



Abu Ali Hashmi

Sidi **Azam Jahangier** this information is beneficial to all. The info about Dajjal and the Hour is not beneficial beyond the extent of the Qur'an/ Sunnah. Sayyidina Shaykh recited for me on the phone the dates/days of the most important days in the year in the next 25 years. I just put 10 on here. Will post the rest later insha'Allah. Enjoy and be thankful

3y Like Reply



Ibn Machich

Salam aleykoum dear **Abu Ali Hashmi** Hashmi is this day based on calculate or ilham ?

2v Like Reply

This is Exhibit 5 referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 20 18

G. J. D. Digney
COMMISSIONER, ETC.

June 16, 2018

Madina Seminary
2380 Speakman Drive
Mississauga, Ontario
L5K1B4
Attention : Board of Directors and Executive Director

SUBJECT : DEMAND FOR LOAN REPAYMENT OF \$225,000 TO RANDALL T. SHAW

Assalamu Alaikum

Firstly I would like to extend Eid Mubarak to each and everyone of you and your families. Ramadan is such a glorious month and I am so honoured to be able to live it each year.

Now that Ramadan has concluded I would like to request , as you had promised, the repayment of my long overdue loan. In fact, the loan is in excess of 24 months delinquent, and by any measure this is an extremely generous grace period that has been extended to you.

I would like to further reiterate a number of points I made when I met with yourselves at Madina in December 2017 (and wrote to you on April 8, 2018). Firstly, I was quite distressed and disappointed to learn that Madina has engaged in Riba based borrowings which are requiring significant monthly interest payments. I am certainly not as well read in Islamic matters as many of you, but I have learned and do know the importance of avoiding Riba and the penalties that come with engaging in it. Secondly, I have learned and do know the importance of all Muslims honouring their agreements and the penalties for not doing so.

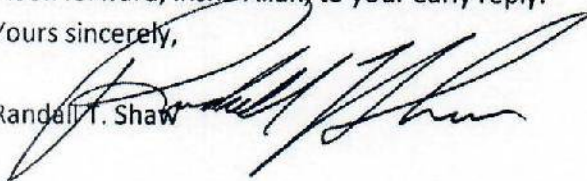
The third point I made to you, the Board, in December 2017 was the strong suggestion that you sell your building in order to repay your loans, honour your commitments, and then regroup as a more appropriately sized organization. Your operations are clearly not sustainable with the present building, even with everyones' best efforts to raise funds.

In closing I would request the full repayment of my \$225,000. loan within 30 days from today's date. Should you fail to do so I would be left with no alternative but to take legal action, and that is no one's best interests. As fellow Muslims we can do better than this can't we.

I look forward, insha'Allah, to your early reply.

Yours sincerely,

Randall T. Shaw



This is Exhibit T referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 2018

Siddiqui

COMMISSIONER, ETC.

From: **Fatima Hussain** <fatima.amin786@gmail.com>

Date: Sun, Aug 20, 2017 at 1:21 PM

Subject: Madina Emergency, action required

To: Sayyidi Shaykh Ninowi hafizahullah <mymsna@gmail.com>, Ahmed Raza Yousuf <ahmed@bayinternational.ca>, adam mohammed <adamhamde@gmail.com>, Ibrahim Hussain <shaykhibrahim@madinaseminary.ca>

Assalaamu alaykum everyone,

This email is to address a few important issues facing Madina Canada and to get the teams opinions on something that has been presented to us recently. Ibrahim asked me to send this email as he is busy with travelling at the moment.

Madina seminary has been our life and we have all been losing more sleep over its operations than even over our own children. We don't have any peace in our house if Madina is not safe and secure. Whether it's the gas and electricity being shut off, bill after bill left unpaid, property insurance being cancelled, being unable to repay our qarze hasana, any other form of harm to Madina, and so many other things unmentionable, it's our domain to worry about these things and fix the problems. Not being able to repay people brings bad press to the org.

We have always turned to Allah, and begged Him to guide us and help us overcome the challenges. So many good things have also happened over this year thanks to everyone's help and sincere support towards the project!

Now we are possibly about to face one of the greatest challenges: FORECLOSURE by the Harbour Mortgage company and having Madina Seminary being taken over by them and then sold for a low price, where we would not only be left with no money to repay our loans but Madina Seminary would have no credibility or respect in the community.

As a way out of this Ibrahim started discussions with TD bank to get a lower interest mortgage to pay off Harbour. It's been a long ordeal getting to this point with TD bank but as of right now our accountant said it's a 50-50 chance of getting this mortgage.

So what happens if we don't get this mortgage? Where is the \$2.2M coming from?? Ahmed said that he is working on providing this full amount to Harbour, but what happens if Ahmed's deal doesn't come through? And, will it come through by next Friday?

In a separate effort to help us become financially stable, we signed an agreement with David Colley a couple of weeks ago to help us find a tenant who could lease the unused portions of the building, so

that might provide for our monthly expenses to be taken care of in the event we do end up getting the TD mortgage. However, he informed us unexpectedly that he has someone instead who really wants to buy the property. They want to build a sports secondary school and they have money. David said its worth more than \$6M and we'd be starting with \$8M as the asking price.

We need to consider this as an option for the benefits it could bring Madina. I'm not saying we have to sell, but that we all need to think about this option with an open mind, given the fact that there are a couple of challenges we are facing.

1. Riba (Interest) based mortgages and the harms this brings.
2. Lack of zoning for place of worship.

Regarding lack of zoning, we can't legally do Jumu'ah or Eid Salaat. That isn't likely to change.

I just want to close off with our most important message. Regardless of whatever we decide in the end, there is a need to start negotiations with the buyer immediately, **before** we get rejected by TD bank, because then we lose everything and Harbour Mortgage Company takes over. But, at least this way we have an option to be saved in the works and an offer on the table.....Again regardless of the final decision. So we need to discuss with David the selling price immediately, I suggest Ibrahim go ahead with that if everyone agrees. This doesn't mean we are selling the building, but we need to have an offer on the table before Madina Seminary is occupied by Harbour Mortgage company.

Can everyone please reply and send their input on this.

JazakumAllah Kharyan,

Fatima

This is Exhibit 4 referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 2018

Siddiqui

COMMISSIONER, ETC.



Masjid Al-Fatima (SA) Announce



Foundation Stone

Laying The Foundation Stone Of Madina Institute
Branch In Edmonton Under The Umbrella Of

MASjid Al-Fatima (SA) By:



Founder Of Masjid Al-Fatima (SA)

Al-Haj Hazrat Syed Riazuddin Ahmed Shah Shaheb

&

Founder Of Madina Institute

Shaykh Syed Mohammad bin Yahya Al Ninowy



All Are Cordially Invited To Attend & Support This Blessed Ceremony
Tomorrow Wednesday 2:00pm November 7th, 2018

Masjid Al-Fatima 9275-25 Ave. Edmonton

<http://masjidalfatima.com>

This is Exhibit V referred to in the
Affidavit of Abraham Hussain
Sworn before me this 21st
day of November 2018

Siddiqui

COMMISSIONER, ETC.

[REDACTED]

Oakville, Ontario.



In the Name of God the Most Compassionate, the Most Merciful. Praise be to Allah – La Illaha Illa Hu - the Lord of the Worlds, Who said to ask those who know when you know not. The Best of Prayers and Peace upon our Master, our Imam, the Coolness of our Eyes, Muhammad and on his pure family.

Date: October 30, 2014

Sayyid Dr. Shaykh Muhammad ibn Yahya Al-Ninowy

Dear Sayyidi Shaykh Muhammad Al-Ninowy:

My name is [REDACTED], one of your humble students, and I respectfully and modestly ask you to please help me with some issues I struggle with; some of which I have been trying to overcome for around 2 years. Allah says to ask those who know, and therefore, Sayyidi, I am asking you as no one has been able to successfully help me thus far.

The following are the issues that I desperately need help to overcome, and I pray that Allah (subhanahu wa ta'ala) Gives us success. Amin.

Waswasa/satanic whispers: I constantly (every ten minutes or less [on average]) am bombarded with various idolatrous/kufr and evil sayings, visions, and notions that plague my mind involuntarily.

- a) I will get sayings like [and not limited to] (May God Almighty Allah Forgive me and Forbid them): “so and so is God”; swearing to Allah or disgusting sayings about Prophet Muhammas (saw); “so and so [whether it be human or jinn] is my lord”; “I hope [something bad] will happen to that person”; “I want to be [insert terrible thing]”; and more.
- b) I will get visions like (May God Almighty Allah Forgive me and Forbid them):
 - a. Names stuck in my mind, such as: “the devil”, “lucifer”, “iblees”, “satan” and bad people like “hitler” “stalin” “eminem” “marylin manson” “charles manson” etc.
 - i. Then compounded with these, I will get overwhelming insinuations that I am, Allah forbid, worshipping them etc.
 - b. Visions of these people and things, symbols (crosses, upside down crosses, satanic star, etc), as well as false idols (such as hindu, ancient Iranian etc...). Also, when I look at people sometimes, involuntarily, the word “God” comes in my mind as in I am, God forbid, ascribing divinity to the created. I would rather be reduced to ashes before that.
 - i. Then compounded with these, I will get overwhelming insinuations that I am, Allah forbid, worshipping them etc.
 - c. Visions of bad things happening to people.

- c) I also get struck with overwhelming feelings and notions that almost fog my reasoning. So, for example, the normal individual would like just laugh the previous wasaawis off by having confidence in themselves that this is ridiculous and not their intentions, and I try to do this. But then I get feelings that I actually, Allah Forbid, did. Quite alarming.

Additionally, an overwhelming weight comes over my eyes, and it feels heavy!

Also, I get physical pain in my heart when these waswasa occur.

I have been told by various scholars to just ignore...but I think it has gone beyond just ignoring. I think that something needs to be done. Please help me, Sayyidi!

Physical issues/Jinn: I know that it is taboo and everyone claims jinn activities as an excuse for their failures or something out of the ordinary that happens, but I do feel that the wasaawis stated above are caused by them, as well as other more physical things that I experience. With this being said if I have psychological issues I would be more than happy to try to overcome them. Some physical things I experience are:

- a) Sometimes when I wake up for fajr I feel an evil presence like close behind me as I make wudū or when I make my way to the washroom. I try to ignore it and to be honest I am not actually scared of them because I know that the power of these creations are nothing when faced with the Power, Ability, and Majesty of Allah swt, but it is still concerning.
- b) There has been explicit jinn activity in my home (banging on things; moving of things; disassembly of things), but I have not had any explicit things happen to me in my dorm room and may Allah keep it that way. Ameen. Side note: my father is very ill and stays at home, and is usually the one that experiences these physical occurrences (banging, etc..)
- c) Terrible dreams.
- d) Allahu Alim, but I also experience like times as I fall asleep that my body becomes rigid, a painful spasm, where I'm consciously awake. I recite "A'oodhu BiLlahi min ash-shaytanir rajim!" and then it eventually ends. Very weird experience to go through. I have **not** had an out of body experience.

There was a point where I was so stressed due to these issues that I lost a notable amount of weight and people noticed.

The issue with this problem is when you try to engage with the waswasa to fight them off, they get worse. When you don't fight them off, you feel passive and then are insinuated to that you have given in, Allah Forbid! Every time I do dhikr, make dua, or pray salah, I get these wasaawis and I feel like a mushrik every time. My eyes are dim from grief worn out by this trial, Sayyidi.

These wasaawis began before I converted, when I was becoming religiously and sincerely Jewish. Praise be to Allah Who Guided me to this religion Islam and has Saved me from His Punishment.

I yearn for your sohba, and have a strong urge to see you and feel a deep love for you.



Thank you for your time and please pray for me. I want nothing but to dedicate myself to the religion of Islam, the service of Prophet Muhammad, his inheritors, and his ummah (pbuh); and to serve, worship, pray to, adore, love, and thank Allah in the best of ways pleasing to Him. No other desire.

Wa Salaam.

Sincerely,

[Redacted signature]

This is Exhibit W referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 2018

Jeddequi

COMMISSIONER, ETC.



Youth Night at Madina Institute USA

Saturday Nov 9th, 2013 From Isha to Midnight

Speakers:

Shaykh Muhammad Mendes

Hafiz Hassan Faye

Hosted by Ahmed Salim

Open to Sisters and Brothers 14 and older

*Free event with talks, discussions,
games and much more...*

Pizza and refreshments will be served



*Madina Institute USA
4991 Burns Rd
Lilburn, GA 30047*



madinainstituteusa@gmail.com



madinainstituteusa.org



/MadinaInstituteUS



770.925.2488



/MadinaUSA

This is Exhibit X referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 2018

Siddiqui

COMMISSIONER, ETC.

الحمد لله رب العالمين والصلاة والسلام على سيد المرسلين ط آمين فاعوذ بالله من الشيطان الرجيم ط بسم الله الرحمن الرحيم ط

Sunnah Inspired Ijtimaa

Mairaj-un-Nabi (صلى الله تعالى عليه وسلم)

Date
&
Time

Monday April 24, 2017

After Salat-ul-Maghrib (8:19 PM)

Separate arrangement is available for sisters



Faizan-e-Madinah

4991 Burns Rd NW
Lilburn, GA 30047

Dinner will be served after Ijtimaa



FaizaneMadinahATLANTA

This is Exhibit 4 referred to in the
Affidavit of Ibrahim Hussain
Sworn before me this 21st
day of November 2018

Siddiqui
COMMISSIONER, ETC.

From: "Naseer (Irfan) Syed" <irfan@ksmlaw.ca>
Date: August 14, 2018 at 4:59:52 PM EDT
To: "Fatima Hussain" <fatima.amin786@gmail.com>
Cc: <pathik@sdsllawfirm.com>, <lisa@sdsllawfirm.com>, <adamhamde@gmail.com>
Subject: RE: Urgent-Thomas Randall Shaw agreement to extend loan repayment

If Mr. Shaw's lawyer is copied on this correspondence, then I believe it would be expedient to request a copy of the proposal or document directly if it is something to be agreed to by the organization.

However, note that Mr. Shaw can provide the extension for consideration received by him from parties other than the organization itself. If so, and the organization itself is under no additional obligations, then that may be documented in an agreement to which the organization need not be a party.

Naseer (Irfan) Syed

Tel: 416-367-4993

-----Original Message-----

From: Fatima Hussain <fatima.amin786@gmail.com>
Sent: August 14, 2018 3:35 PM
To: irfan@ksmlaw.ca
Cc: pathik@sdsllawfirm.com; lisa@sdsllawfirm.com; adamhamde@gmail.com
Subject: Re: Urgent-Thomas Randall Shaw agreement to extend loan repayment

Dear Naseer (Irfan) Syed,

Below is an email sent by Ahmed Raza Yousuf to myself and Dr. Adam.
Based on his email, his lawyer Mark Lathem has drafted an agreement with Mr. Shaw.
Me and Dr. Adam have not seen that agreement as of today, neither has ahmed told us more about it.

Me and Dr. Adam want to sign this agreement, especially since it is very gracious of Mr. Shaw to give Madina Seminary more time to repay his loan.

The email is below:

From: "Ahmed Raza Yousuf" <ahmed@bayinternational.ca>
Date: August 8, 2018 at 6:50:15 PM EDT
To: "Sayyidi Shaykh Muhammad bin Yahya" <mymsna@gmail.com>, "Adam Mohammed" <adamhamde@gmail.com>, "Fatima Hussain" <fatima.amin786@gmail.com>

Subject: Outstanding Madina Issues Update and Meeting request

"Assalamwalekum Everyone,

I pray that everyone is doing well.

I wanted to update you with regards to the three most pressing issues regarding Madina which we agreed upon to resolve.

1.) Randall Shaw

- My lawyer spoke with his lawyer and we have agreed upon extending the term of the loan until July 2019.
- We will pay the legal fee for him and we will be putting a lien to secure his loan under my property."

My husband got a call and message from Mr. Shaw earlier today, who stated the following:

"I am advised that Shayhk Nonoway and Ahmad have agreed to my proposal but Dr Adam and your wife have not. Very disappointed to hear this.."

Naseer (Irfan) syed, please can you immediately get us this agreement so we can sign it and prevent Madina Seminary from further legal action. Mr. Shaw's lawyer is copied and they have been told that he is Madina's lawyer, whereas you have been Madina's lawyer since 2015.

Me and Dr. Adam want to sign this agreement immediately and want to thank Mr. Shaw for his kindness and patience!

Thank you.

Regards,

Fatima Amin-Hussain

Court File No. CV-18-4291
AHMED RAZA YOUSUF and MUHAMMAD NINO
also known as **SHAYKH MUHAMMAD BIN YAHYA**
AL HUSAYNI AL NINOWY
Respondents

and

FATIMA AMIN-HUSSAIN and ADAM
MOHAMMED
Applicants

ONTARIO
SUPERIOR COURT OF JUSTICE

Proceeding commenced at Brampton

REPLY AFFIDAVIT OF IBRAHIM
HUSSAIN

ABRAHAMS LLP
385 Silver Star Blvd,
Suite 215,
Toronto, Ontario
M1V 0E3

Attention: Shahzad Siddiqui (#47934E)

Tel.: 416-291-6786
Fax: 416-291-8784

Counsel to the Applicants