

## Retraction

This writing is a retraction of an article that I authored which referenced (i) Grupo Karim's S.A., (ii) "Green Valley," and (iii) Mohammad Yusuf Amdani Bai. As more fully set forth below, this article incorrectly attributes illicit activities to the entities and person herein identified and for this reason, the instant retraction is warranted.

In 2009, Phoenix Management Security Group, a Panamanian corporation for which I was under contract, conducted a study for the U.S. Department of Defense which resulted in a report titled *Operation Cazando Anguilas* (the "Report"). I subsequently wrote an article titled "Terrorism and Commercial Transportation: Use of Ships, Cargoes, Containers to Transport Terrorists and Materials," (the "Article") which was published in the book *Maritime Security and Defence Against Terrorism*.<sup>1</sup> The Article indirectly cited the *Operation Cazando Anguilas* Report and the shipping records of Grupo Karim's S.A. for the proposition that Mohammad Yusuf Amdani Bai, Grupo Karim's S.A., its subsidiaries, and an entity referred to as "Green Valley,"<sup>2</sup> are all involved in illicit acts including (but not limited to) smuggling, materially supporting terrorism, money laundering, and human trafficking.<sup>3</sup>

For legal reasons related to national security, I cannot disclose the identity of the sources who provided me with the information (including alleged shipping records) upon which I based the Statement—a Statement that I now acknowledge is completely false. Further investigation has revealed facts that were unknown to me when the Report and Article were written. The following propositions are most salient and relevant for purposes of this retraction:

- (1) the information upon which the Statement was based was a fabrication (including the alleged shipping records),

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<sup>1</sup> "Terrorism and Commercial Transportation: Use of Ships, Cargoes, Containers to Transport Terrorists and Materials," in *Maritime Security And Defence Against Terrorism*, 51 (F. Bora Uzer ed., IOS Press, 2012).

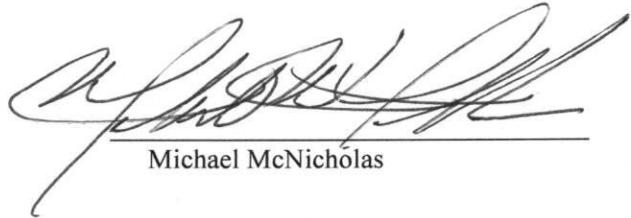
<sup>2</sup> "Green Valley" was referred to as a textile assembly company.

<sup>3</sup> This proposition is hereinafter referred to as the "Statement."

(2) there is no "Green Valley" textile company associated with Mr. Amdani Bai or Grupo Karim's S.A. or its subsidiaries, and

(3) there is no evidence linking Mr. Amdani Bai, Grupo Karim's S.A. (or its subsidiaries), Green Development Corporation S.A. de C.V., Green Valley Industrial Park, or any entity associated with the foregoing to money laundering, smuggling, facilitation of terrorism, or any of the illicit or immoral activities mentioned in the Article and Report nor any other illicit or immoral activities of any kind.

I apologize and hereby formally retract the Statement, which erroneously imputed horrendous acts to innocent persons and companies.



Michael McNicholas

On this 4 day of April, 2016, before me, the undersigned notary public personally appeared Michael McNicholas, proved to me through satisfactory evidence of identification, which were US Driver's License, to be the person whose name is signed above, and who swore or affirmed to me that the contents of the documents are ~~the~~ <sup>are</sup> truthful and accurate to the best of his/her knowledge and beliefs.

Christopher Bryan Haas  
Signature of Notary Public

Christopher Bryan Haas  
Printed Name of Notary Public

My Commission Expires: December 23, 2018

**CHRISTOPHER BRYAN HAAS**  
Notary Public  
Carroll County  
Maryland  
My Commission Expires Dec. 23, 2018