

SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
CIVIL DIVISION

STEVEN J. ROSEN,)	
)	
Plaintiff)	
v.)	Civil Action No. 09-1256
)	Calendar 12
AMERICAN ISRAEL PUBLIC AFFAIRS)	Judge Erik P. Christian
COMMITTEE, INC., et. Al.,)	
)	
Defendants)	

MOTION FOR AUTHOR GRANT F. SMITH FOR LEAVE TO FILE
A BRIEF AS AMICUS CURIAE

Author Grant F. Smith respectfully moves this Court for leave to file the attached brief as *amicus curiae* over issues raised by evidence he has gathered and distributed to the public through articles and books, and which has been submitted as evidence, but which has been materially misrepresented by the Defendant.

Jeff Stein of the *Washington Post* calls Smith “a Washington D.C. author who has made a career out of writing critical books on Israeli spying and lobbying.” James Petras, Bartle Professor (Emeritus) of Sociology at Binghamton University, New York claims "Grant F. Smith is without peer as an archival scholar" in this domain. Blogger Philip Weiss claims that in this subject “the best investigative work is being done by Grant Smith...” Nathan Guttman of *The Jewish Daily Forward* recognizes Smith as leading a [REDACTED] effort to “call attention of the authorities to AIPAC’s activity and demands public scrutiny of the group’s legal status.” John J. Mearsheimer, the R. Wendell Harrison Distinguished Service Professor of Political Science at the University of Chicago claims “Grant Smith's

new book¹ is a major step forward in correcting that problem. He provides a fascinating--and disturbing--account of how I.L. Kenen laid the groundwork for AIPAC, the most powerful organization in the lobby.” Smith has written a half-dozen books about Israel lobbying, espionage in the United States and AIPAC’s history.

On January 3, 2011 the Defendant filed its Consent Reply Memorandum Of Defendants In Support Of Their Motion For Summary Judgment supporting its claims that the Plaintiff’s defamation suit should be dismissed. It responded to declassified FBI files obtained by Grant F. Smith under the Freedom of Information Act and his public interest correspondence with the Office of the President obtained during research for the 2009 book *Spy Trade*² introduced by the Plaintiff into evidence. The Defendant also introduced expert news articles written by Grant F. Smith about classified information handling as evidence, such as *Should AIPAC Decide What is Classified?*³ but misrepresents the declassified FBI files obtained for *Spy Trade* (made publicly available on the Internet by the author at <http://IRmep.org/ila/economy>) through incomplete and selective extraction.

As a recognized, long time analyst and public interest reporter about AIPAC, Grant F. Smith is an interested party in questions raised by this matter because the Defendant publicly misrepresents some of Grant Smith’s most important primary research in its filings. The Court’s decision based on the misrepresentation of evidence by the Defendant may impact how other courts react to civil actions and criminal prosecutions in an area of increasing national concern: the private circulation of classified US government information. Also, the Defendants misrepresentations also will likely affect future civil actions guided by Grant F. Smith’s research that seek disgorgement or other compensation. For the

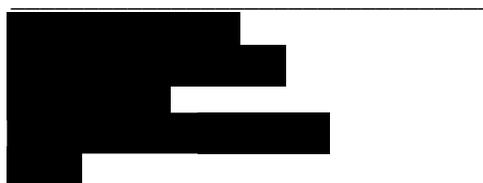
¹ *America’s Defense Line*, ISBN 978-0976443728

² ISBN number 978-0-9764437-1-1, Library of Congress no. 2009036408

³ Antiwar.com, 2/23/2009 <http://www.antiwar.com/orig/gsmith.php?articleid=14297>

foregoing reasons, Grant F. Smith respectfully requests that this Court GRANT this Motion and accept the attached amicus curiae brief instanter.

Respectfully submitted
Grant F. Smith,



CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Motion, was served on counsel for the Plaintiff and Defendants at the address set forth below by regular United States mail, this 10th day of January, 2011.

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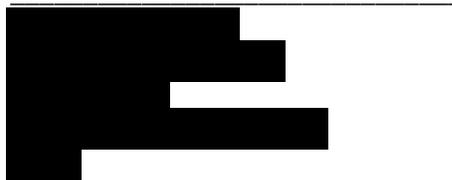
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Grant F. Smith,

A handwritten signature in black ink, appearing to read "Grant F. Smith", written over a horizontal line.A large black rectangular redaction box covering the signature area, positioned below the handwritten signature.