

SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA

Civil Division

STEVEN J. ROSEN,

Plaintiff,

v.

AMERICAN ISRAEL PUBLIC AFFAIRS
COMMITTEE, INC., et. al.,

Defendants,

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) Civil Action No. 09-01256 B
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**PLAINTIFF'S RESPONSES TO AIPAC'S
REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff, by and through his below-signed attorney of record, notes that, after plaintiff conducted an exhaustive search involving hundreds of hours, he is producing the following described documents bearing a number from 1 to 131, each of which is responsive to one or more of defendant AIPAC's document requests: [Note that the descriptions of the documents are offered as an aid to defendants and their counsel and, accordingly, the composition of and punctuation used in the document descriptions below are exclusively that of counsel for plaintiff – and not plaintiff himself – and are not meant to be in any sense authoritative descriptions of the documents being produced.]:

No. Description of Produced Document

1. January 4, 2004, Employee Performance Review of Steven Rosen.
2. April 20, 1982, letter from Steven Rosen to Tom Dine transmitting proposed "Memorandum of Agreement" for the new department that he would be heading at AIPAC beginning July 1, 1982.
3. October 11, 1983, letter from Steven Rosen to Guilford Glazer, a lay leader, with copies to Tom Dine, Executive Director (who responded "Excellent stuff!") and Lawrence Weinberg,

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| | AIPAC's President, in which Rosen described a "secret National Security Decision Directive #99 calling on the Armed Services and the Secretary of Defense to explore the potential for stepped-up strategic cooperation" with Israel and said "we provided some materials on a confidential request." |
| 4. | May 8, 1984, The Washington Post, "Legality at Issue: FBI Probing Libyan Aid to Black Activists," BYLINE: By John M. Goshko and Joe Pichirallo, Washington Post. [This document is related to an incident involving the AIPAC Board of Directors and classified information about Libya in 1984.] |
| 5. | June 18, 1984, letter from AIPAC board member praising Rosen plan for Executive Branch lobbying |
| 6. | August 3, 1984, The Washington Post, "FBI Investigates Leak on Trade To Israel Lobby," BYLINE: By Stuart Auerbach, Washington Post , SECTION: First Section; A1 This article concerns the leaking of a classified U.S. International Trade Commission report, which was entitled "Probable Economic Effect of Providing Duty-Free Treatment for U.S. Imports from Israel, Investigation No. 332-180 (re-designated TA-131(b)-10)," and had a "confidential" classification stamp on each of the 300+ pages, dated 1984. The article reports that, "A spokesman for AIPAC...acknowledged that the organization had a copy of the [classified] report but said the lobbying group did nothing illegal... 'There was nothing illegal about our having something that was not solicited.'" [No member of the AIPAC Board criticized the staff for receiving this classified information in 1984.] |
| 7. | August 3, 1984, The Associated Press, "FBI Investigating How Trade Document Leaked," Byline: By Michael J. Sniffen, reports that AIPAC "spokeswoman Lisa Behren said, 'We had a copy [of the classified ITC report] and we turned it over to the U.S. government at their |

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| | request.” [No member of the Board criticized the staff for receiving this classified information in 1984.] |
| 8. | September 6, 1985, “Report to the AIPAC Board of Directors’ Strategic Planning Committee” on “Lobbying the Executive Branch,” by Steven J. Rosen, in which plaintiff warned the AIPAC Board of Directors in 1985 that an energetic program of Executive Branch Lobbying would inevitably come in contact with government secrets. In this document, Rosen said: “Unlike Congressmen, ... [Executive Branch officials] work for secretive rather than open institutions and agencies... The Executive Branch is... secretive, veiled in security... A serious program to transform our relations with the Executive Branch ... requires changes in some of the principles of policy that have guided us until now... We may decide that the costs and risks exceed the benefits... We should make a set of conscious choices with discussion of the implications.” |
| 9. | April 23, 1986 "U.S. Interception of the 'Cold River' Command," detailed material on U.S. signal intelligence intercepts of the PLO, provided by AIPAC Board of Directors member (and later AIPAC President) Mayer Mitchell to Senate Committee Chairman Senator Jeremiah Denton, published on pages 165-167 as an appendix to “Legal Mechanisms to Combat Terrorism,” Hearing before the Subcommittee on Security and Terrorism of the Committee on the Judiciary, United States Senate, Ninety-ninth Congress, Second Session, “Hearing On the Availability of Civil and Criminal Actions Against Yassir Arrafat's Palestine Liberation Organization (PLO),”, 332 pages (S. Hrg. 99-822). |
| 10. | July 6, 1987 New York Times report on "Lobbying For Israel: The American Israel Public Affairs Committee" By David K. Shipler, saying, “A classified list of proposed arms sales that |

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the United States regularly compiles is provided by the Administration each year - at least orally - to AIPAC officials."

11. May 13, 1988, letter to AIPAC from President Ronald Reagan.
12. January 23, 1990, AIPAC Benefits and Personnel Policies.
13. June 13, 1991, report on Howard Kohr hiring a stripper at AIPAC, The Lobbyists From AIPAC, Girding for Battle in the New World Order, The Washington Post, by Lloyd Grove.
14. March 21, 1995, Bylaws of the American Israel Public Affairs Committee.
15. August 1, 1995, "More Complaints About Housing Discrimination by Mitchell Brothers," by Edmund Tsang, The Harbinger.
16. April 9, 1996, "Mitchell Brothers Faces a Third Housing Discrimination Lawsuit While Near Settlement in Another," by Edmund Tsang The Harbinger.
17. June 13, 1996, "Rental Manager Pays Record \$ 1.8 Million in Racial Bias Case," By Michael J. Sniffen, Associated Press Writer.
18. June 13, 1996, Department of Justice Press Release: "Mitchell Brothers Inc. Agrees To Pay Record \$1.8 Million For Allegedly Refusing To Rent To African Americans."
19. October 7, 1997. "Mitchell Brothers Wants Aetna Insurance to Pay Housing Discrimination Costs," by Edmund Tsang, The Harbinger.
20. February 19, 1998, Department of Justice Press Release: "Justice Department Sues Mobile Apartment Complex Owners For Discriminating Against African Americans."
21. November 17, 1998, "It Pays to Discriminate?? Circuit Court Judge Orders Aetna to Pay Mitchell Brothers for the Housing Discrimination Lawsuits and Then Some," by Edmund Tsang, The Harbinger.
22. "Battling Over Lawyers Fees in AIPAC case," JTA.

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| 23. | October 25, 2000, From: James J Welsh, To: John Rood@kyl.senate.gov, Sent: Wednesday, October 25, 2000, 9:04 PM , Subject: Statement of James J. Welsh on Khartoum; memorandum provided to one of AIPAC's registered lobbyists by the office of Senator Jon Kyl, which Kyl's Assistant John Rood had received from James J. Welsh, containing classified signal intelligence information. |
| 24. | AIPAC Benefits and Personnel Policies, dated December 1, 2000. |
| 25. | September 22, 2001, Washington Post, "Saudis Balk at US Use of Key Facility." |
| 26. | October 1, 2001, "Confidential Memorandum to Senior Staff" from AIPAC staff member Rafi Danziger, re: "Lunch with Lisa Johnson of the NSC," dated October 1, 2001, describing secret understandings with Saudi Arabia and intelligence findings about links between Osama Bin laden and Hezbollah and Hamas. |
| 27. | November 18, 2002, "Impact of the BRCA on Contribution Limits for Individual Contributors," written by AIPAC's General Counsel, Philip Friedman. |
| 28. | December 3, 2002, "Political Activities of AIPAC Members," written by AIPAC's General Counsel, Philip Friedman. |
| 29. | January 20, 2003, "Thompson Memorandum" on "Principles of Prosecution of Business Organizations" (which document prosecutors told AIPAC should guide its actions toward Rosen and Weissman). |
| 30. | February 24, 2004, memo from Steven Rosen to AIPAC counsel Nat Lewin, informing him that AIPAC had hired legal counsel in 1984 to advise the organization about how to deal with an FBI investigation of its possession of allegedly classified information. [The incident is important because no member of the Board criticized the staff for receiving such classified information in 1984.] |

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31. March 2, 2004, Steven Rosen email to Abbe Lowell regarding a conversation with a journalist about the incident in which AIPAC received classified information about Libya in 1984, which had led to an FBI investigation.
32. July 21, 2004, email from "Keith Weissman" (KWeissman@aipac.org) To: "Howard Kohr" (Hkohr@aipac.org), dated Wed, July 21, 2004, saying "In a conversation with someone familiar with US intelligence, I learned the following information:..."
33. August 30, 2004, "Spy Case Not What Originally Claimed by 'Gotcha' Media," New York Sun.
34. Aug. 31, 2004, The New York Times, "F.B.I. Interviews 2 Suspected of Passing Secrets to Israel," By David Johnston.
35. August 31, 2004, "FBI Questions Israeli Lobbyists in Spying Probe," By Richard B. Schmitt and Tyler Marshall, L.A. Times Staff Writers.
36. September 7, 2004, AIPAC September 2004 Fund-raising Letter.
37. October 4, 2004, Memorandum From: A.D. Lowell, to: The Rosen/Weissman Files, cc: P. Friedman, N. Lewin,, J. Campbell, "AIPAC Inquiry Background Facts: Revised, Last Revised September 1, 2004."
38. October 5, 2004, "AIPAC Briefing Paper on the Allegations Reported in the Media Regarding AIPAC and Two AIPAC Employees," informing the AIPAC Board of Directors and Executive Director that "Mr Franklin said [to Keith Weissman in their July 21, 2004 "sting" meeting] that some of his information was sensitive or classified" (page 13).
39. October 15, 2004, "Narrative Post Task Force Revisions October 15, 2004," consisting of a draft speech that was prepared by a team headed by Deputy Executive Director Richard Fishman, for a speech tentatively planned for delivery by Executive Director Howard Kohr.

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[Page 7 of the draft Kohr speech states that Franklin told Weissman that he was providing "sensitive or classified information from an intelligence source," and the draft speech reported that Weissman and Rosen then re-transmitted this information to others and defended this action as appropriate.]

40. October 18, 2004, "Narrative Post Task Force Weekend Revisions" adds to the October 15 draft speech.
41. November 1, 2004, USG Standards for a Corporate Legal Compliance Program, United States Sentencing Commission, Guidelines Manual §8B2.1, 2. Effective Compliance and Ethics Program, on the responsibility of a corporation to provide legal counsel and guidance to its employees to avoid infractions of the law.
42. December 2, 2004, "FBI Seizes Files of Pro-Israel Group," Washington Post.
43. December 5, 2004, 'Post' exclusive: "How the FBI set up AIPAC" By Janine Zacharia, Jerusalem Post. [This article, which was the subject of an AIPAC Board of Directors conference call the same day, stated that Steven Rosen and another AIPAC employee were "set up by the FBI "...FBI agents used a courier, Pentagon analyst Larry Franklin, to draw two senior AIPAC officials who already knew him into accepting what he described to them as 'classified' information, reliable government and other sources intimately familiar with the investigation have told the Post. One of the AIPAC pair then told diplomats at the Israeli Embassy in Washington about the 'classified' information...The agents' hope, plainly, was that the AIPAC pair would be so troubled by the apparent life-and-death content of the information from Franklin as to risk a breach of US espionage statutes and transfer what they believed to be classified material to a foreign power, Israel." Subsequent to this article, the AIPAC Board and

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- senior staff expressed support for the actions taken by Rosen and Weissman, in spite of the alleged transmission of classified information.]
44. December 16, 2004, Letter from four members of Congress to President Bush, describing Rosen and Weissman as "dignified individuals" who were entrapped by "a questionable sting operation...an incredulous operation to entrap otherwise innocent Americans."
45. January 2005 (exact date unknown) Notes of a briefing about the appearance of four AIPAC staff members before a Grand Jury.
46. January 3, 2005, Employee Performance Review of Keith Weissman for his work during calendar year 2004, in which Weissman was given top ratings for the year, cosigned by James Haynes, Chief Financial Officer. [Weissman was also given a bonus in excess of \$3,000, and a raise in his salary for 2005.]
47. January 31, 2005, copy of AIPAC check number #058869, dated, conveying a job performance bonus of \$7,000 to Steven J. Rosen for good performance during calendar year 2004.
48. February 7, 2005, Viet Dinh, Bancroft Associates, PLC, "Matter of AIPAC Employees," which Mr. Dinh discussed with AIPAC's General Counsel, Philip Friedman. [See Document No. 89 below.]
49. Email String – February 18, 2005, from: "Cullen, Richard" (rcullen@mcguirewoods.com), Howard Kohr's then attorney, to nat@lewinlewin.com, AIPAC's then attorney, sent: Fri, 17:49:27 -0500 ,Subject: RE: Conference call on next steps; Feb 19 2005 From: "psf" psf@consumerlawhelp.com, Philip Friedman, AIPAC's General Counsel, to: "Cullen, Richard" rcullen@mcguirewoods.com [Howard Kohr's then attorney], Sent: 00Subject: ...; February 19, 2005 From: nat@lewinlewin.com [AIPAC's attorney], Sent: Saturday, , To: Cullen, Richard [Howard Kohr's attorney]; February 19, 2005 From: Cullen, Richard

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- [mailto:rcullen@mcguirewoods.com] [Howard Kohr's attorney], Sent: Saturday, 9:51 AM, To: Lowell, Abbe David [Rosen's attorney]; February 19, 2005 From: Lowell, Abbe David [Rosen's attorney], Sent: Saturday, 11:29 AM, To: 'psf@consumerlawhelp.com' [Philip Friedman, AIPAC's General Counsel], Subject: RE: RE: Conference call on next steps; February 24, 2005, TO: nat@lewinlewin.com, alyza@lewinlewin.com, From: Rosen20817@aol.com, Copies: adlowell@chadbourne.com, jcampbell@chadbourne.com, psf@consumerlawhelp.com, Anelson@chadbourne.com, Kweissman@aipac.org, Subject: AIPAC policy on classified information; March 22, 2005 From: Nathan Lewin [mailto:nat@lewinlewin.com] [AIPAC's attorney], Sent: Tuesday, 6:25 PM, To: 'Campbell, Julie' [another Rosen attorney]; 'Philip Scott Friedman' [Philip Friedman, AIPAC's General Counsel]; 'Nat Lewin (nat@lewinlewin.com)' [AIPAC's attorney], Cc: 'Lowell, Abbe David' [Rosen's attorney]; 'Howard Kohr'; Rfishman@aipac.org [Howard's Deputy Executive Director]; 'Cullen, Richard' [Howard Kohr's attorney]; 'Alyza Lewin' [another AIPAC attorney], Subject: RE: DiGregory [deputy U.S. Attorney for the Eastern District of Virginia] meeting -- ; March 25, 2005 5:34:31 PM Eastern Standard Time , From: ADLowell@chadbourne.com [Rosen's attorney], To: Rosen20817@aol.com, Jcampbell@chadbourne.com.
50. February 25, 2005, debrief of conversation between Nat Lewin, AIPAC attorney, and Kevin DiGregory, prosecutor in the Office of the United State Attorney for the Eastern District of Virginia.
51. March 10, 2005, Steven Rosen's memorandum to members of the Advisory Committee of the AIPAC Board of Directors.
52. April 20, 2005, The Forward.

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| 53. | April 20, 2005, emails from Abbe Lowell and John Nassikas. |
| 54. | April 21, 2005, defamatory statement in the New York Times: "Israeli Lobby Reportedly Fires 2 Top Aides in Spying Inquiry." |
| 55. | April 21, 2005, defamatory statement: "2 Senior AIPAC Employees Ousted" By Dan Eggen and Jerry Markon of The Washington Post. |
| 56. | Apr 29, 2005, "FBI Affair Costs Lobby Dynamic Director Rosen," by Ori Nir, The Forward. |
| 57. | May 19, 2005, "Pro-Israel Lobbying Group Holds Meeting Amid Worries," by Jeffrey H. Birnbaum, The Washington Post. |
| 58. | May 20, 2005, The Nation (Magazine), Hall of Mirrors, by Laura Rozen. |
| 59. | May 20, 2005 "Impacting on AIPAC" by Nathan Guttman, Ha'aretz. |
| 60. | May 23, 2005 "AIPAC: Franklin affair won't harm our work," By Nathan Guttman Ha'aretz. |
| 61. | May 23, 2005, defamatory statement NY Sun - "Aipac Leaders Will Address FBI Probe," By Eli Lake |
| 62. | June 18, 2005, "AIPAC Suspects Shared Info With Boss," Jerusalem Post. [Detailed how Rosen and Weissman fully briefed Howard Kohr on the Weissman/Franklin meeting.] |
| 63. | June 20, 2005, "New Revelations in AIPAC Case Raise Questions about FBI Motives," JTA. |
| 64. | July 4, 2005, defamatory statement New Yorker Magazine. |
| 65. | July 14, 2005, The Big Chill by Laura Rozen The Nation magazine. |
| 66. | August 4, 2005, "Former Lobbyists Charged in Pentagon Probe; Suspects had been Fired from Pro-Israel Group for 'Conduct,'" CNN. |
| 67. | August 5, 2005, "Israel Lobbyists Facing Charges in Secrets Case," by David Johnston, New York Times. |

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68. August 5, 2005, "U.S. Indicts 2 in Case of Divulged Secrets," by Dan Eggen and Jamie Stockwell, The Washington Post (at A05).
69. August 12, 2005, "Indictment of ex-AIPAC staffers called chilling," by Ron Kampeas and Matthew E. Berger, JTA (originally posted August 5, 2005).
70. August 12, 2005, "Indictments Shed Light on Aipac 'Spying' Probe," by E.J. Kessler, The Forward.
71. August 12, 2005, "What Did AIPAC Know, And When Did It Know It?: Report of internal memo suggests lobbyist indicted for federal security breaches may have acted with boss' knowledge," by Larry Cohler-Esses, New York Jewish Week.
72. August 17, 2005, "Former pro-Israel lobby chief says he was aware of aide's access to secret info in '83," by Larry Cohler-Esses, Editor-At-Large, NY Jewish Week.
73. August 17, 2005, "Former AIPAC staffers indicted for passing information," The New Standard.
74. August 18, 2005, "U.S. Diplomat is Named in Secrets Case," by David Johnston and James Risen, New York Times.
75. August 18, 2005, "New Revelations in AIPAC Case Raise Questions about FBI Motives," JTA.
76. August 26, 2005, Neal Sher quoted in The Forward.
77. September 8, 2005, defamatory statement by Howard Kohr, Cleveland Jewish News.
78. September 23, 2005, "AIPAC Givers Sought To Fund Job For Fired Top Official," New York Jewish Week.
79. September 26, 2005, "Restructuring at AIPAC," By Ron Kampeas, JTA.
80. September 30, 2005, "Guilty Plea Planned in Secrets Case", by Jerry Markon, The Washington Post.

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| 81. | October 10, 2005, Morris Amitay, quoted in The New Republic. |
| 82. | November 12, 2005, defamatory statement in The Washington Post. |
| 83. | December 9, 2005, 2:08:04 PM Eastern Standard Time email from:
<u>Nassikas.John@Arentfox.Com</u> [Weissman's attorney]. |
| 84. | December 13, 2005, "Battling Over Lawyers Fees in AIPAC Case," Jewish Telegraphic Agency. |
| 85. | December 23, 2005, "Indicted Officials Consider Suing Pro-Israel Lobby", by Ori Nir, The Forward. |
| 86. | Early 2006 notes beginning "first meeting Nat and Richard Cullin and Howard with prosecutors." |
| 87. | January 11, 2006, "Attorneys for Former AIPAC Officials are Battling to Recoup Legal Costs," The New Standard. |
| 88. | January 20, 2006, "Pentagon Analyst Gets 12 Years for Disclosing Data," by David Johnston. |
| 89. | February 14, 2006, "Former Official Backs Lobbyists in AIPAC Leak Case", by Walter Pincus, The Washington Post. [See related material in "The Power Player Who Faces Charges for Talking", by Jeffrey H. Birnbaum, The Washington Post, April 21, 2006, who reported that: "Defense lawyers... have enlisted a surprising ally: Viet D. Dinh, former head of the Justice Department's Office of Legal Policy and an author of the Bush administration's USA Patriot Act. Dinh helped write a memorandum that called for the dismissal of the Espionage Act charges against the lobbyists. The memo said that in the 90 years since the act was drafted, 'there have been no reported prosecutions of persons outside government for repeating information that they obtained verbally.' The memo also said that in receiving leaked classified information and relaying it to others, the lobbyists were doing what journalists, |

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- think-tank scholars and congressional staff members 'do perhaps hundreds of times every day.' AIPAC dispute[s] those assertions. 'Rosen and Weissman were dismissed because they engaged in conduct that was not part of their jobs, and because this conduct did not comport with the standards that AIPAC expects and requires of its employees,' AIPAC spokesman Patrick Dorton said." See Document No. 48 above.]
90. March 5, 2006, "Pro-Israel Lobbying Group Roiled by Prosecution of Two Ex-Officials," by Scott Shane and David Johnston, New York Times.
91. March 8, 2006, defamatory statement in The Baltimore Sun.
92. April 21, 2006, defamatory statement, "The Power Player Who Faces Charges for Talking", by Jeffrey H. Birnbaum, The Washington Post.
93. May 23, 2006, "FBI Questioned Jewish Leaders In Aipac Case," by Josh Gerstein, Staff Reporter, New York Sun.
94. June 2006 "AIPAC and Israel: The Rosen-Weismann Scandal Sheds Light on the Complex Relationship Between the Lobby and Israel," by Nathan Guttman, Moment Magazine.
95. June 29, 2006, "Ruling on Legal Bills at KPMG Could Be a Boon to Aipac Pair," New York Sun.
96. July 18, 2006, Defendants' Motion To Dismiss The Indictment Or For Other Relief Due To The Government's Infringement Of Defendants' Rights Under The Fifth And Sixth Amendments Of The United States Constitution.
97. July 18, 2006, Sworn Affidavit of Abbe Lowell of Chadbourne and Parke, submitted to U.S. District Court for the Eastern District of Virginia, in support of "Defendants' Motion to Dismiss the Indictment" in the case of U.S. v. Rosen and Weissman.

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98. July 18, 2006, Sworn Affidavit of Laura Lester of Arent Fox, submitted to U.S. District Court for the Eastern District of Virginia, in support of "Defendants' Motion to Dismiss the Indictment" in the case of U.S. v. Rosen and Weissman.
99. July 19, 2006, defamatory statement in Jewish Telegraphic Agency.
100. August 3, 2006, "When solidarity turns to profiteering," by Douglas Bloomfield, Washington Jewish Week.
101. August 18, 2006, "Lobby's Calls for Donations Debated," by Rebecca Spence, The Forward.
102. September 22, 2006, Defendants' Reply Memorandum in Support of their Motion to Dismiss the Indictment or other Relief, unsealed by the Court March 22, 2007.
103. November 20, 2006, email from: Philip Friedman [<mailto:psf@consumerlawhelp.com>] sent: Monday, 2:21 PM, to: Lowell, Abbe David, Subject: RE: Update, I don't think there are any illusions among anyone that there is "something not kosher here." But I also don't think that vitiates "the conduct cannot be condoned" element of Steve and Keith's dismissal, or the continued willingness to pay legal fees if we had a release.
104. November 21, 2006, email from Lowell, Abbe David , sent Tuesday, 7:22 AM, to 'psf@consumerlawhelp.com' (Philip Friedman, AIPAC's General Counsel).
105. March 27, 2007, "Filing Sheds Light on AIPAC Probe," by Ron Kampeas, Jewish Telegraphic Agency.
106. May 11, 2007, defamatory statement in the Jewish Telegraphic Agency article "Judge: Government pressured AIPAC."
107. August 17, 2007, email Subject: AIPAC , Date: 87:59:39 P.M. Eastern Daylight Time, From: jvanwesel@hotmail.com, reply to: rosen20817@aol.com.
108. August 17, 2007, defamatory statement in the Jerusalem Report,

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| 109. | December 15, 2007, email: Subject: RE: nu? , Date: 8:08:28 A.M. Eastern Standard Time , from ADLowell@mwe.com , to Rosen20817@aol.com . |
| 110. | January 2008, defamatory statement in the Washingtonian Magazine, "FBI Stings Two DC Lobbyists," by Mark Matthews. |
| 111. | March 3, 2008, defamatory statement in the New York Times article "Trial to Offer Look at World of Information Trading," by Neil A. Lewis. |
| 112. | May 4, 2008, Abbe Lowell on the AIPAC Case and the Jewish Community interviewed by Rabbi Shmuel Herzfeld of Temple Ohev Sholom for a Washington area radio program webcast. |
| 113. | May 22, 2008, "Lawyer of Accused Ex-Aipac Official Says Community Forsaking Its Own; Civil Liberties Groups Step In, Take Up Rosen, Weissman Cause." by Nathan Guttman, The Forward. |
| 114. | Jun. 2, 2008, "Is AIPAC showing some cracks?" by Calev Ben-David , The Jerusalem Post. |
| 115. | October 14, 2008, defamatory statement in email, from Nathan Guttman , Date: 6:56:04 P.M. Eastern Daylight Time , from: guttman@hotmail.com , to rosen20817@aol.com . |
| 116. | February 12, 2009, report in JTA that AIPAC's fund-raising nearly doubled in four years. |
| 117. | February 23, 2009, "Should AIPAC Decide What's Classified?," by Grant F. Smith, Antiwar.com. |
| 118. | February 23, 2009, Press Release, "Documents Reveal AIPAC Trade Secrets Leak Leading to \$71 Billion Export Loss." |
| 119. | March 5, 2009, "The 'AIPAC Two' aren't the only ones on trial," by Douglas M. Bloomfield, New Jersey Jewish News. |

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120. March 11, 2009, "Ex-AIPACer Suing Former Employer for Defamation," by Ron Kampeas, Jewish Telegraphic Agency.
121. March 18, 2009, "Advocacy Operations Spared Amid Crash," by Nathaniel Popper, The Forward.
122. July 31, 2009, contract with Public Affairs Press for book on the AIPAC/ Rosen/Weissman case.
123. August 25, 2009, letter from Public Affairs Press transmitting advance payment of \$8,500 for book on the AIPAC/Rosen/Weissman case.
124. November 2, 2009, "Confessions of an AIPAC Veteran" by Helena Cobban, The Nation.
125. Undated "Rosen's Reputation."
126. Undated: "The Contribution of Steven Rosen to the Establishment of the U.S.-Israel Strategic Alliance."
127. Undated: "AIPAC's Culpability for failure to provide legal guidance."
128. Undated: "AIPAC, Espionage and the US-Israel Free Trade Agreement: Documents," <http://www.irmep.org/ila/fta/>.
129. Undated: "AIPAC Knew All the Key Facts in October [2004] and Defended Them."
130. Undated: "Phil: Disclosure of importance the 2nd disclosure."
131. Undated: "Phil debriefs Ester."
132. March 9, 2009, letter from the Office of the U.S. Trade Representative confirming that the document AIPAC admitted receiving in 1984 is still "classified in its entirety."

Each document being produced is responsive to the numbered document request under which that document's number appears:

Response to Document Request No. 1: See documents 1, 8, 12, 14, 24, 26, 27, 28, 32, 36, 37, 38,

39, 40, 46, 47, 48, 49, 50, 86, 103, 130, and 131.

Response to Document Request No. 2: See documents 1 through 132.

Response to Document Request No. 3: See documents 1 through 132.

Response to Document Request No. 4: See documents 1 through 132.

Response to Document Request No. 5: See documents 1 through 132.

Response to Document Request No. 6: See documents 1 through 132.

Response to Document Request No. 7: See documents 1, 6, 7, 8, 9, 10, 12, 13, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 37, 38, 39, 40, 41, 43, 44, 45, 46, 47, 48, 49, 50, 51, 53, 55, 56, 60, 62, 63, 69, 71, 72, 76, 77, 78, 79, 81, 83, 84, 85, 86, 87, 89, 90, 92, 95, 96, 97, 98, 102, 103, 104, 105, 109, 112, 113, 118, 120, 1127, 128, 129, 130, 131, and 132.

Response to Document Request No. 8: See documents 1-132.

Response to Document Request No. 9: See documents 1, 8, 12, 14, 24, 26, 27, 2832, 36, 37, 38, 39, 40, 46, 47, 48, 49, 50, 86, 103, 130, and 131

Response to Document Request No. 10: See documents 1 through 132.

Response to Document Request No. 11: See documents 1 through 132.

Response to Document Request No. 12: See documents 1 through 132.

Response to Document Request No. 13: This item is not in plaintiff's possession.

Response to Document Request No. 14: Plaintiff had no employment contract; but see documents 1, 8, 12, 14, 24, 26, 27, 2832, 36, 37, 38, 39, 40, 46, 47, 48, 49, 50, 86, 103, 130, and 131.

Response to Document Request No. 15: See documents 1 through 132.

Response to Document Request No. 16: See document 1.

Response to Document Request No. 17: Plaintiff objects to this document request on attorney-client privilege and attorney work product grounds. Without waiving these objections, plaintiff notes that no decision has been made as to trial exhibits.

Response to Document Request No. 18: Documents responsive to this document request are not currently in plaintiff's possession, but have been requested from his health care provider.

Response to Document Request No. 19: Documents responsive to this document request are not currently in plaintiff's possession, but have been requested from his health care provider.

Response to Document Request No. 20: Documents responsive to this document request are not currently in plaintiff's possession, but have been requested from his health care provider.

Response to Document Request No. 21: See documents 1 through 132.

Response to Document Request No. 22: Other than divorce proceedings, which plaintiff objects to producing on relevance grounds and on the grounds that such items are not calculated to lead to admissible evidence, plaintiff has not been a party to any lawsuits.

Response to Document Request No. 23: All employment inquiries and responses to them were oral, and plaintiff has no written records pertaining to them.

Response to Document Request No. 24: Plaintiff has not yet completed the assembly of his financial records, but will provide them when he has done so.

Response to Document Request No. 25: Plaintiff has not yet completed the assembly of his income tax returns, but will provide them when he has done so.

Response to Document Request No. 26: No such document exists.

Response to Document Request No. 27: No such document exists.

Response to Document Request No. 28: See documents 122 and 123.

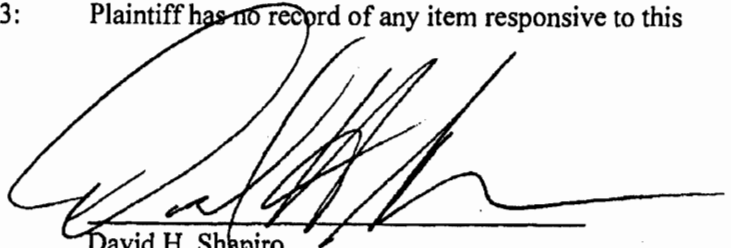
Response to Document Request No. 29: To the best of plaintiff's knowledge, no such item exists.

Response to Document Request No. 30: Though plaintiff was interviewed by Israel Channel 10 television news, which interview appeared on May 6 and 7, 2009, to the best of his knowledge copies of this interview are not available.

Response to Document Request No. 31: No document responsive to this request exists.

Response to Document Request No. 32: As plaintiff has never been deposed, no document responsive to this request exists.

Response to Document Request No. 33: Plaintiff has no record of any item responsive to this request.

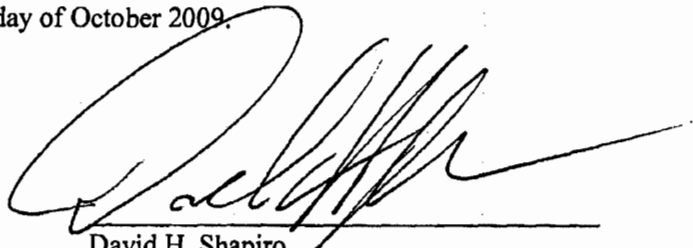


David H. Shapiro
SWICK & SHAPIRO
1225 Eye Street, NW
Suite 1290
Washington, DC 20005
Tel. 202-842-0300
Fax 202-842-1418
email - dhshapiro@swickandshapiro.com

Attorney for Plaintiff

Certificate of Service

I HEREBY CERTIFY THAT the plaintiff's responses to defendant AIPAC's first set of document requests have been served upon defendants by sending a copy thereof to their attorneys of record, Thomas L. McCally and Allie M. Wright, of Carr Maloney P.C., at 1615 L Street, N.W., Suite 500, Washington, DC 20036, on this 30th day of October 2009.



David H. Shapiro
SWICK & SHAPIRO, P.C.