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May 14, 2010

VIA EMAIL & US MAIL

Mr. David Shapiro, Esq.
1225 Eye Street, NW
Suite 1290
Washington, DC 20005
dhshapiro@swickandshapiro.com

RE: AIPAC/ROSEN
Our File No.: 07309DC001

Dear Mr. Shapiro:

Through your client's document production it is apparent that your client, Steven Rosen, has violated AIPAC's employee handbook by being in possession of confidential, privileged, and proprietary documents that belong to AIPAC. As put on the record at the deposition of Richard Fishman, AIPAC previously requested the return of all AIPAC proprietary and confidential documents, and destruction of any copies. Please accept this letter as AIPAC's demand that Mr. Rosen return all copies of any documents he surreptitiously and improperly took from AIPAC after his termination in violation of the employee handbook.

Specifically, Mr. Rosen has violated the confidentiality and tangible property provisions of the handbook, which state in pertinent part:

CONFIDENTIAL INFORMATION

An employee shall not, either during the term of his/her employment or any time thereafter, disclose to any person, corporation or other entity any confidential information learned by the employee as a result of his or her employment by AIPAC. The term "confidential information" includes, but is not limited to: a) the names and addresses of members or contributors to AIPAC; b) non-public information relating to any activity of

AIPAC; c) non-public information relating to any officer, director, employee, or member of AIPAC or any contributor to AIPAC; d) non-public information relating to any program or contemplated program of AIPAC; or e) any documents or information which contain or are derived from confidential information concerning AIPAC, its members or its activities.

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AIPAC TANGIBLE PROPERTY

Employees are expected to exercise care in the use of AIPAC's property and to use such property only for authorized purposes. Negligence in the care and use of AIPAC's property or unauthorized removal of AIPAC's property from the premises or its conversion to personal use will be considered cause for suspension and/or dismissal.

Upon termination of employment with AIPAC for any reason, or when the employee's department head/regional director or a designated representative otherwise requests its return, employees are required to immediately return to AIPAC all documents, property (including computers), or materials of any nature which are in the employee's possession or control which he/she obtained from AIPAC or compiled or produced for AIPAC during the employee's employment and any and all copies thereof.

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This demand for the return of AIPAC materials and information includes but is not limited to:

1. AIPAC Benefits and Personnel Policies (1990), produced as document 12.
2. AIPAC's Bylaws, produced as document 14.
3. AIPAC Benefits and Personnel Policies (2000), produced as document 24.
4. Memorandum re: Lunch with Lisa Johnson of NSC, produced as document 26.
5. Memorandum re: Impact of the Bipartisan Campaign Reform Act of 2002 "BRCA" on Contribution Limits for Individual Contributors, produced as document 27.
6. Memorandum re: Political Activities of AIPAC Members, produced as document 28.
7. Employee Performance Review -Keith Weissman, produced as document 46.

Mr. Rosen's possession of the above-mentioned documents, as well as any others he misappropriated from AIPAC, are a blatant violation of the AIPAC policies contained in the AIPAC handbook. As an employee for over twenty-three (23) years, Mr. Rosen knew or should have known that taking these documents was inappropriate conduct. Most offensive is that Mr. Rosen has stolen the private employment evaluation of another employee and produced it in this litigation with no regard for that employee's privacy and personal information.

Please note AIPAC retains all rights as outlined in the handbook to seek redress and

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damages for violations of this policy. All documents, including originals and copies thereof, are to be returned to AIPAC within ten (10) business days of receipt of this letter. You may direct them to my attention at the Washington, D.C. Carr Maloney offices.

We trust you will act promptly and give proper attention to remedying this serious violation of AIPAC's trust and confidence in a former employee.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. McCally', written in a cursive style.

Thomas L. McCally