

Appeal No. 11-cv-368

**DISTRICT OF COLUMBIA
COURT OF APPEALS**

STEVEN J. ROSEN,

Plaintiff-Appellant,

v.

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

Defendant-Appellee.

On Appeal from the Superior Court
of The District of Columbia, Civil
2009 CA 001256 B
(The Honorable Erik P. Christian, Judge)

APPENDIX

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EXHIBIT F

**DEFENDANTS' CONSENT
REPLY MEMORANDUM**

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Jackson/libya 1984

February 24, 2004

TO: nat@lewinlewin.com, alyza@lewinlewin.com

From: Rosen20817@aol.com

Copies: adlowell@chadbourn.com, jcampbell@chadbourn.com, psf@consumerlawhelp.com,

ANelson@chadbourn.com, KWeissman@aipac.org

Subject: AIPAC policy on classified information

Dear Nat and Alyza,

Last Thursday, I told you about a past incident in which AIPAC's then Executive Director (Tom Dine) and senior Board of Directors members obtained legal counsel for me in a situation where the FBI was investigating me for receipt of allegedly classified information, concerning Libyan officials at the United Nations giving money to an American Presidential candidate's staff. I made the point on Thursday that no disapproval of my actions was voiced by any AIPAC official at that time. Indeed, my reasons for concern about the information were endorsed by the officials cognizant of the incident, and I was given a positive performance evaluation that year and every year since.

I have now succeeded in pinpointing more accurately the approximate date of this incident. It happened just prior to the date of the funeral of AIPAC's then President, Morton Silberman, which was in February 1984 (he died February 27, 1984). The significance of this date is that it was early in my AIPAC employment (twenty months after my start date of July 1, 1982). I do not recall any other occasion in which AIPAC policy toward receipt of information that might be alleged to be classified came up in the past twenty-three years, so this admittedly ancient incident is of relevance.

-Steve Rosen

Miami Herald, The (FL)

February 29, 1984

MORTON SILBERMAN, WAS ACTIVE LEADER IN JEWISH AFFAIRS

Morton Silberman, 60, past president of the Greater Miami Jewish Federation and president of the American Israel Public Affairs Committee, died Monday (February 27, 1984) in Washington, D.C. A Miami resident for the past 17 years, ... Mr. Silberman was secretary-treasurer of the East Coast Supply Co. in Miami. Survivors include his wife, Phyllis; daughters, Adria and Margie; a brother, Lewis; and two grandchildren. Riverside Memorial Chapels are in charge of arrangements. The family requests donations be made to the Morton Silberman Foundation, 2 Grove Isle, Coconut Grove, Fla. 33133.

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EXHIBIT A

**DEFENDANTS' CONSENT
REPLY MEMORANDUM**

VIDEOTAPED DEPOSITION OF STEVEN J. ROSEN
CONDUCTED ON WEDNESDAY, SEPTEMBER 22, 2010

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1 you've just listed, these entities, you may not have 8:01:24
2 asked many of them for a position? 8:01:29
3 A In no case did I go to people and say, 8:01:32
4 "How about hiring me for a position?" I told you at 8:01:35
5 the beginning, I have not applied for a job in the 8:01:38
6 conventional sense since 1970. It isn't the way at 8:01:40
7 least I operate or have operated, even long before 8:01:46
8 this situation. 8:01:49
9 Q Are there any entities that you went to 8:01:50
10 since 2005 and asked for a position? I mean not 8:01:53
11 your definition of efforts, but where you said, 8:01:59
12 "Will you hire me?" 8:02:01
13 A Only after a substantial encouragement. 8:02:04
14 And those are the ones that I work for now. 8:02:07
15 Q And who are they? 8:02:09
16 A I work now for the Middle East Forum, a 8:02:10
17 think tank headquartered in Philadelphia, 8:02:13
18 Pennsylvania, and for the ELNET, E-L-N-E-T, a 8:02:18
19 Brussels-based, Brussels, Belgium-based organization 8:02:21
20 that is helping European pro-Israel organizations be 8:02:25
21 more politically effective. And so in those two 8:02:31
22 cases, with substantial encouragement from them, we 8:02:36

VIDEOTAPED DEPOSITION OF STEVEN J. ROSEN
CONDUCTED ON WEDNESDAY, SEPTEMBER 22, 2010

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1	did have explicit discussions about positions, and I	8:02:38
2	in fact am in those two part-time positions now.	8:02:42
3	Q The Middle East Forum, who is your	8:02:46
4	supervisor,?	8:02:48
5	A Middle East Forum, Daniel Pipes,	8:02:49
6	P-I-P-E-S.	8:02:52
7	Q And what's your salary there?	8:02:52
8	A I believe it's -- it's \$6,500 a month.	8:02:58
9	Q That's about 80, \$90,000 a year?	8:03:07
10	A I would have to do the math. It sounds	8:03:11
11	approximately right. I would have to do the math.	8:03:13
12	Q It's a part-time position?	8:03:15
13	A It is a part-time position.	8:03:16
14	Q And when did you apply?	8:03:17
15	A I didn't exactly apply, as I keep	8:03:18
16	reciting. But it started in 2008, late 2008,	8:03:21
17	before, I might add -- in this particular case, they	8:03:31
18	had the courage to take me on before my case was	8:03:34
19	dismissed by the judge.	8:03:36
20	Q And when were you hired? The process	8:03:37
21	started in late 2008. When were you hired?	8:03:39
22	A Well, the process started three years	8:03:41

From: Keith Weissman
To: Kohr, Howard
Date: 7/21/04 5:37PM
Subject: July 21, 2004

July 21, 2004

TO: Howard

From: Keith

In a conversation with someone familiar with US intelligence, I learned the following information:

Iran recently transferred to its embassy in Baghdad a Mr. Qumi (first name unknown) from their station in Herat, Afghanistan. Qumi is a senior Revolutionary Guards, Quds Force commander.

Qumi is responsible for Iran's burgeoning special ops/intelligence presence throughout Iraq.

Iran is putting into Iraq a large number of their Arabic-speaking operatives who they recalled from Egypt, Algeria, Jordan and other Arabic-speaking countries.

Iran is also shoring up their control of key personnel in Iraq's oil industry in the crucial southern part of Iraq.

Iran is also shoring up their control of the Badr Brigade, the Iraqi Shiite militia based previously in Iran during Saddam's days.

Iran is sending surveillance/assassination teams to northern Iraq to uncover Israelis and their activities there (as reported by Seymour Hersh) with an eye to eventually targeting them for killing.