

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

MATTHEW PITTARD; and)	
MATTHEW ALLENDE,)	
Plaintiffs,)	Case No.
)	8:19-CV-1784
v.)	
)	
H.E. SHEIK KHALID BIN KHALIFA)	
AL THANI; GEO STRATEGIC DEFENSE)	
SOLUTIONS, LLC; and)	
KH HOLDING, LLC,)	
Defendants.)	

Videotaped deposition of ALAN BENDER, under subpoena by the Plaintiffs herein, held before a stenographic court reporter at the offices of Toronto Court Reporters, 65 Queen St. West, Ste. 1410, Toronto, Ontario, Canada, on Wednesday, the 23rd day of October, 2019, at 9:00 a.m. EST.

COPY

1 A P P E A R A N C E S :

2 For Plaintiffs:

3 THE CASTANEDA LAW FIRM PLLC

4 BY: Rebecca Castaneda, Esq.

5 506 N. Armenia Avenue

6 Tampa, Florida 33602

7 Tel. 813-708-8864

8 E-mail: Rc@attorneyrebeccacastaneda.com

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24 ALSO PRESENT: Peter Goodale, Videographer

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- 24
- 25

INDEX OF PROCEEDINGS

WITNESS: ALAN BENDER, SWORN

EXAMINATION

By Ms. Castaneda

PAGE

6

1	INDEX OF EXHIBITS	
2	NO./ DESCRIPTION	PAGE
3	EXHIBIT 1 marked for identification:	10
4	Subpoena to Testify at a	
5	Deposition in a Civil Action,	
6	issued to Alan Bender, dated	
7	October 2, 2019	
8	EXHIBIT 2 marked for identification:	12
9	Subpoenas (3) to Testify at a	
10	Deposition in a Civil Action,	
11	issued to: Abdullah ibn Hamad	
12	Al-Athbah dated October 9,	
13	2019; Mohammed bin Ahmed	
14	Al-Masnad dated October 8,	
15	2019; and to Meshall bin Hamad	
16	Al Thani dated October 10,	
17	2019	
18	EXHIBIT 3 marked for identification:	15
19	Letter from Dean M. Dilley to	
20	Rebecca Castaneda dated	
21	September 18, 2019	
22	EXHIBIT 4 marked for identification:	131
23	Complaint and Demand for Jury	
24	Trial	
25		

1 --- Upon commencing at 9:17 a.m.

2 THE VIDEOGRAPHER: This is Peter Goodale,
3 Certified Legal Videographer, from Toronto
4 Court Reporters. We are going on the
5 record on Wednesday, October 23rd, 2019,
6 at the time indicated on the video, which
7 is 9:17 a.m.

8 Here begins Media Number 1 in the
9 deposition of Alan Bender, taken by the
10 plaintiff in the matter of Matthew Pittard
11 and Matthew Allende versus H.E. Sheikh
12 Khalid bin Hamad bin Khalifa Al Thani et
13 al., case number 8:18 -- 19, excuse me,
14 -cv-1784, filed in the United States
15 District Court for the Middle District of
16 Florida, and being held at Toronto Court
17 Reporters, 65 Queen Street West, Suite
18 1410, Toronto, Ontario, Canada.

19 The certified court reporter is Karin
20 Jenkner from the firm Toronto Court
21 Reporters.

22 Counsel, please introduce yourselves
23 and state whom you represent; then the
24 court reporter will swear in or affirm the
25 witness.

1 MS. CASTANEDA: Good morning. My name is
2 Rebecca Castaneda, and I am counsel for
3 the plaintiffs, Matthew Allende and
4 Matthew Pittard.

5 ALAN BENDER,
6 having been duly sworn,
7 was examined and testified as follows:

8 THE VIDEOGRAPHER: Please begin.

9 EXAMINATION BY MS. CASTANEDA:

10 Q. Okay. Good morning.

11 A. Good morning.

12 Q. How are you?

13 A. I'm good, thank you.

14 Q. Good. Before we start and I ask any
15 questions, I want to ask that you wait until the
16 full question that I'm asking you be asked before
17 you go ahead to say an answer.

18 Okay. What is your name?

19 A. Alan Bender.

20 Q. All right. And where do you live?

21 A. Toronto, Canada.

22 Q. All right. And where were you born?

23 A. Kuwait.

24 Q. What city?

25 A. Kuwait City.

1 Q. Okay. And where did you go to
2 school?

3 A. High school in Kuwait, university in
4 Damascus University.

5 Q. Okay?

6 A. On a scholarship.

7 Q. On a scholarship?

8 A. Mm-hm.

9 Q. Academic or sports?

10 A. Actually, scoring really high up,
11 flying -- passing with flying colours in high school
12 granted me.

13 Q. So academic --

14 A. Yes.

15 Q. -- based on your grades. Okay. And
16 what did you major in?

17 A. Law.

18 Q. Okay. And is that considered a law
19 degree in their country? In that country?

20 A. In their country, yes.

21 Q. Okay.

22 A. Yes.

23 Q. And could you practice law here in
24 Canada with that degree?

25 A. We have to go through the Canadian

1 facilitated bar exam, so you have to go, like, three
2 years.

3 Q. Mm-hm?

4 A. And then move forward. So I got into
5 business instead.

6 Q. Okay.

7 A. With my degree.

8 Q. Is your bar licence still active with
9 the degree that you have?

10 A. There in Syria or Middle East, could
11 be, yes.

12 Q. Okay. And what is your citizenship?

13 A. Canadian citizen.

14 Q. Have you ever held any other
15 citizenship?

16 A. No.

17 Q. No. Okay.

18 What languages do you speak?

19 A. Arabic, English, and a little bit of
20 Serbian.

21 Q. Are you considered fluent in all
22 those languages?

23 A. The two languages, yes; the third
24 one, not fluent.

25 Q. Do you speak more than you can read?

1 A. In which?

2 Q. The third?

3 A. I would say I will understand their
4 language the way they talk, what they say. I
5 wouldn't write anymore, no.

6 Q. Okay.

7 A. I didn't spend long enough.

8 Q. Okay. Do you understand the regional
9 dialects of those languages?

10 A. The Arabic language, yes.

11 Q. Okay?

12 A. All of it. Almost.

13 Q. Almost. Would you say that you can
14 speak with anybody from any area of the Middle East?

15 A. From the 18, 17 countries, yes.

16 Q. Okay. Did you prepare for today?

17 A. No.

18 Q. Did anybody ask you not to comply
19 with the subpoena to be here today?

20 A. Yes.

21 Q. Who?

22 A. The Government of Qatar.

23 Q. Okay.

24 A. Officials from the Government of
25 Qatar.

1 Q. Who specifically?

2 A. Abdullah Al-Athbah on behalf of the
3 head of the Qatari Internal and External
4 Intelligence, and Mohammad Al Masnad.

5 Q. So, two individuals?

6 A. Yes.

7 Q. And yet you're here today complying?

8 A. Yes.

9 Q. Okay. And were you properly served
10 with this subpoena?

11 A. Yes.

12 Q. Is that your name?

13 A. Yes.

14 Q. Okay. I'd like to mark this as
15 Exhibit 1, please.

16 EXHIBIT 1 marked for identification: Subpoena to
17 Testify at a Deposition in a Civil
18 Action, issued to Alan Bender, dated
19 October 2, 2019

20 BY MS. CASTANEDA:

21 Q. Did anybody else ask you not to
22 comply with this subpoena?

23 A. Yes. Some phone calls from local
24 numbers in Qatar, unregistered numbers, but it's a
25 message, also on behalf of the Qatari government,

1 hoping that I will just ignore it like they did.

2 Q. Okay. So they ignored subpoenas?

3 A. Yes, they admitted to me that they
4 received them and they decided not to attend.

5 Q. Subpoenas for this particular case?

6 A. For this particular case.

7 Q. Okay. I'm going to show you a couple
8 documents and ask that you ID these.

9 A. KH Holdings, I don't have any
10 connection with KH Holdings but...

11 Q. You recognize the names of those
12 are --

13 A. Yes.

14 Q. Okay?

15 A. Abdullah ibn Hamad Al-Athbah and
16 Mohammad Al-Masnad.

17 (Query by reporter)

18 THE WITNESS: Sorry. I'm reading the
19 names.

20 THE REPORTER: Could you repeat the name
21 that you said more slowly.

22 THE WITNESS: Oh, okay. Mohammad bin
23 Ahmed Al-Masnad.

24 Q. And who is that?

25 A. He is the chief royal advisor to the

1 ruler of Qatar and head of intelligence, internal
2 and external.

3 Q. And to your knowledge, does he have
4 awareness that he was subpoena'd?

5 A. Yes.

6 Q. And how do you know that?

7 A. Abdullah ibn Hamad Al-Athbah received
8 it from me and confirmed that they all received it,
9 that they are aware of them and they have read them,
10 and they told me that I should do what they did,
11 which is ignore them.

12 Meshall bin Hamad Al Thani, that's the
13 Qatari ambassador in Washington, I, I do not have
14 direct contact with him.

15 Q. So you're not aware if he's aware of
16 the subpoena?

17 A. They told me he is aware. Yes.

18 Q. And "they" being who?

19 A. Abdullah Al-Athbah on behalf of
20 Mohammad Al-Masnad, they all acknowledge and they
21 received copies of these from me.

22 Q. Okay. May I mark these as Exhibit 2.
23 EXHIBIT 2 marked for identification: Subpoenas (3)
24 to Testify at a Deposition in a Civil
25 Action, issued to: Abdullah ibn Hamad

1 Al-Athbah dated October 9, 2019;
2 Mohammed bin Ahmed Al-Masnad dated
3 October 8, 2019; and to Meshall bin
4 Hamad Al Thani dated October 10, 2019

5 BY MS. CASTENEDA:

6 Q. Do you know the name Dean Dilley?

7 (Query by reporter)

8 Mm-hm. Do you know the name Dean Dilley?

9 A. Dean Dilley is, I believe, a lawyer.
10 Or they call him in Arabic "mustashar." So he could
11 be their lawyer, the Qataris' lawyer.

12 Q. Mm-hm?

13 A. Or he could be a mediator, or a
14 fixer. So he apparently is a man they consult with.

15 Q. Okay.

16 A. According to Abdullah Al-Athbah. But
17 I don't know him personally. I don't know Dean
18 Dilley.

19 Q. Okay.

20 A. I heard his name and they, they
21 confirm that he's their counsel.

22 Q. Okay. Counsel. And do you know
23 where he lives?

24 A. No.

25 Q. Okay.

1 A. I don't.

2 Q. If you want to set those to the side,
3 you may. Thank you.

4 I'm going to hand you another document,
5 ask that you read that.

6 A. You want me to read it?

7 Q. If you want to read it, not out
8 loud --

9 A. I mean, to me or?

10 Q. -- and then we'll read it out loud.

11 A. Okay.

12 (witness perusing document)

13 Okay.

14 Q. Are you familiar with the contents of
15 this letter?

16 A. I am.

17 Q. And how is that?

18 A. I've seen a copy and also from the
19 fact that the Qataris have informed me that
20 according to his advice, Dean Dilley, they are
21 following what this letter is saying.

22 Q. Okay. Thank you. This will be
23 Exhibit 3, please.

24 A. Thank you.

25 Q. And you can set that aside.

1 EXHIBIT 3 marked for identification: Letter from
2 Dean M. Dilley to Rebecca Castaneda
3 dated September 18, 2019

4 THE WITNESS: Do I get to keep these? Or
5 just decoration?

6 BY MS. CASTENEDA:

7 Q. All right. What do you do for work?

8 A. I'm a businessman. I mediate, help
9 companies in the US and Canada to expand in the
10 Middle East. I've been doing that for several
11 years. I've been helping some, also,
12 government-related entities.

13 Q. Okay.

14 A. In also expanding. I sometimes
15 intervene on behalf of members of the ruling
16 families; mediate, solve their problems, problems
17 that they don't want to be solved via international
18 media.

19 Q. Okay?

20 A. They want to keep it out of court.

21 I've been involved in several Royal Family
22 disputes that I solved.

23 Q. Okay?

24 A. So I do business and politics.

25 Q. And are you hired by these families

1 because of your language ability and your education
2 and your knowledge of the culture?

3 A. When they hire me, yes, it will be
4 based on the fact that I am fully aware of the
5 culture and the sensitive nature of things that they
6 might address, yes.

7 Q. Okay.

8 A. And my expertise in that field.

9 Q. And I would assume that the culture,
10 and knowledge of the culture, and history, and that
11 your language abilities would be unique to not many
12 people?

13 A. Yes.

14 Q. I would assume there's a small group
15 of people like you?

16 A. Also -- yes, and also I am aware of
17 secrets, if we could call that, and events that I
18 would say majority of the population are not aware
19 of that's related to the Royal Families. So they
20 trust me, with the fact that I already know
21 everything.

22 Q. Mm-hm?

23 A. So, yes.

24 Q. And when you say "the majority of the
25 population," are you talking about the world or

1 those specific countries --

2 A. I would say --

3 (Query by reporter)

4 Q. Those specific countries in the
5 Middle East?

6 A. I would say they usually tend to mean
7 the Middle East but now it expanded into the world,
8 because international media is very interested in
9 Royal Family disputes, and especially given the
10 political situation in the Gulf.

11 Q. Mm-hm?

12 A. So I would say, yeah, it's even
13 beyond the Gulf region or the Middle East.

14 Q. Do you have expertise that you've
15 built up with the media that gives you this ability
16 to fix things?

17 A. Yes. Yes. I have direct friendship
18 slash contacts with several prominent journalists in
19 the US and the UK.

20 Q. Okay. Tell me about Qatar. How did
21 you first become involved with them?

22 A. I believe they approached me through
23 the head of the Qatari media centre, Abdullah
24 Al-Athbah, who is also the editor-in-chief of their
25 newspaper, Al Arab. It was after the, I believe,

1 American and British media interviewed me regarding
2 an incident that happened in London.

3 Q. Mm-hm?

4 A. Involving a political Saudi
5 dissident. And the Qataris were very interested in
6 contacting me to know the details of what happened
7 or why it happened or how it happened. And that was
8 the initial contact from them on a high level.

9 Q. Okay. In what year was that,
10 approximately?

11 A. I would say it was three years ago,
12 or last year. It was in the news 2017, I believe.
13 It was before, two months prior to, the incident of
14 Jamal Khashoggi, so just... It's in every media
15 outlet, actually...

16 Q. So approximately 20 --

17 (Query by reporter)

18 A. It's in every media outlet, almost.
19 Like if you search it you will see pictures in, my
20 pictures in.

21 Q. And that was in approximately 2017?

22 A. Yes.

23 Q. Okay. And you were talking about an
24 incident. And where did that occur?

25 A. Exactly outside Harrods shopping

1 building in London.

2 Q. Okay. And what time of day did that
3 occur?

4 A. It was in the afternoon, after lunch.
5 The Saudi dissident has invited me to join him for
6 coffee.

7 Q. Okay?

8 A. And I accepted. I was on a business
9 trip.

10 And when we finished having coffee, he was
11 attacked by what turned out to be two Saudi
12 individuals who may or may not have been part of the
13 Saudi embassy in London.

14 Q. Okay?

15 A. And I was the one who protected him.
16 So I fought them off.

17 Q. Physically?

18 A. Physically.

19 Q. Okay. So did they not only verbally
20 or try to verbally assault him, they tried to
21 physically assault him?

22 A. Yes. They attacked him and they
23 punched him. And, like, he said if I wasn't there,
24 he would have -- they would have crippled him, as
25 they put it.

1 Q. Okay?

2 A. So, yes, I fought them off.

3 Q. Physically?

4 A. Yes.

5 Q. Okay. And then after that what
6 happened? Was there a police report or was that --

7 A. Yes, there was a police report. We
8 insisted on having the police present. And
9 ambulance showed up, and I accompanied him to the
10 police station in the police car, to be a witness.

11 And apparently there were a lot of
12 tourists, so the whole incident was recorded on
13 video from A to Z. And it was aired before we even
14 left the police station, all over social media.

15 Q. And it was filmed by tourists?

16 A. Tourists, yes. And probably, I'm not
17 sure, but probably, other individuals who actually
18 belonged maybe to political parties who are watching
19 that situation.

20 Q. Okay. Are we speaking too fast?

21 THE REPORTER: Yes.

22 THE WITNESS: Oh, sorry. You can just ask
23 me to repeat, I'll repeat.

24 MS. CASTANEDA: I do it too, especially at
25 trial.

1 (Remark by reporter)

2 Yes. Okay.

3 Q. So it was in approximately 2017, and
4 due to this incident in London, that Qatar first
5 approached you and asked if you were willing to meet
6 with them?

7 A. Yes.

8 Q. Okay?

9 A. Abdullah Al-Athbah -- well, it wasn't
10 the first contact where they asked me to meet with
11 them. They actually published in their newspapers
12 the whole incident in Arabic, with my pictures
13 and...

14 Q. The incident that occurred in London?

15 A. That occurred in London, yes.

16 Q. Okay.

17 A. And the first newspaper was Al Arab,
18 I believe. And the editor-in-chief is Abdullah
19 Al-Athbah, who is part of your subpoena.

20 Q. Okay?

21 A. He's the one who contacted me via, I
22 believe, direct messaging on Twitter the first time.

23 Q. Okay?

24 A. Introduced himself --

25 (Query by reporter)

1 Direct messaging on Twitter. On my
2 Twitter account. That was the first. He introduced
3 himself as Abdullah Al-Athbah and he said, "I wanted
4 to commend you, we were very impressed with the fact
5 that you saved that gentleman's life. And we saw it
6 live on video." And I said: "Thank you very much."

7 He sent me a second message probably an
8 hour after that.

9 Q. Mm-hm?

10 A. And he said: "Will it be possible if
11 we can talk?" And I said, "Sure. This is my phone
12 number and feel free to call me at your
13 convenience."

14 Q. Okay.

15 A. And I think two hours after that, he
16 called me. And that was the first time I heard from
17 him. And then he mentioned to me that they had been
18 searching my background and what I do, and that they
19 were impressed with my role in negotiating with
20 Prince Al-Waleed bin Talal. He highlighted the fact
21 that nobody in the world was able to defeat Prince
22 Al-Waleed, especially when he was in his highest
23 might. "How did you do that?" And I said, "Well,
24 that's going to be a long story, but you can read
25 about it." It was published in British media and

1 American media, Huff Post and Daily Mail.

2 Q. And which country is that prince from
3 that you're referring to?

4 A. Saudi Arabia.

5 Q. Okay. And do Saudi Arabia and Qatar
6 get along?

7 A. No.

8 Q. Okay?

9 A. Qatar is at siege by Saudi Arabia and
10 the United Arab Emirates. Prince Al-Waleed --

11 (Query by reporter)

12 Qatar is under siege imposed by Saudi
13 Arabia and the United Arab Emirates.

14 Q. Okay.

15 A. So Prince Al-Waleed bin Talal was,
16 was, one of the five richest people or most powerful
17 people in the world.

18 Q. Mm-hm?

19 A. He's the largest single investor in
20 the American economy. He's the owner of the Four
21 Seasons. He is... he was always received by kings
22 and prime ministers and presidents.

23 So he said they were mesmerized by "how
24 you were able to tame him." And that's how it
25 turned into phone calls, almost. He started calling

1 me almost three, four times a day.

2 Q. Okay.

3 A. And we started discussing politics,
4 and it was -- then he asked me to help them. He
5 said: "We need your help on social media. We want
6 you to side with us." I said: "Well, I always
7 enjoyed protecting the underdogs and stood up to
8 bullies since I was in school, so I will do that."

9 And I started tweeting.

10 Q. Okay.

11 A. Sometimes information that is really
12 beneficiary to the position, the Qatari position --

13 Q. Mm-hm?

14 A. -- that hasn't been known to the
15 public. And through my sources in the US and the
16 UK, I publish it. And it turned out to be true.

17 And I usually publish information that a
18 week or two after that will be published in major
19 American newspapers. And Qataris were shocked as to
20 how I knew all this before was even published. And
21 I said: "Well, that's my recipe."

22 A few months after that, it turned into
23 like almost an hour to an hour and a half of
24 conversations every day with Abdullah Al-Athbah,
25 discussing political moves, political issues. And

1 then he casually brought up the intention of
2 inviting me to Qatar. And this was, I believe,
3 months before my trip to Doha.

4 Q. When you have an invitation from a
5 foreign government asking you to meet in their
6 country, what does that mean from a cultural and
7 political perspective?

8 A. That means they want to discuss
9 things that cannot be discussed on the phone.

10 Q. Okay, so, sensitive?

11 A. Very sensitive, yes.

12 Q. Okay. I want to go back just a
13 little bit.

14 You mentioned that Qatar was impressed
15 with your ability to protect the individual that you
16 were with in London. Why would they care about that
17 individual being protected?

18 A. That individual is on their pay, as
19 according to them. I didn't know until they told
20 me.

21 Q. What is --

22 A. They said they finance almost 99
23 percent of Saudi dissidents in the US and the UK.
24 They pay them.

25 Q. 99 percent?

1 A. I would say -- well, he said all of
2 them. I would go with 99 hoping that leaves some
3 room for --

4 (Query by reporter)

5 He said all of them but I am saying that I
6 would say 99.9 percent. And I think the percentage
7 point left is going to join back too.

8 Q. Okay. So the individual that was
9 physically assaulted that you protected, this person
10 was on Qatar's payroll?

11 A. According to the Qataris.

12 Q. And it was Saudi citizens that you
13 believe physically assaulted?

14 A. Yes.

15 Q. Okay?

16 A. They were Saudi citizens, and
17 according to the media, they claimed that they
18 belong to the embassy of Saudi Arabia.

19 Q. The embassy in London?

20 A. In London.

21 Q. Okay. And were any of those
22 individuals other than the person that you had
23 coffee with known to you before that date?

24 A. No.

25 Q. Okay?

1 A. The Saudi dissident, I knew him from
2 a phone call he made; he called me, yes. But it was
3 the first time I see him in person.

4 Q. Okay.

5 A. And I've never seen those two before
6 in my life.

7 (Query by reporter)

8 The Saudis.

9 Q. "They" being the two people in
10 physically assaulted?

11 A. Correct. The Saudi attackers.

12 Q. Okay. And what is the name of the
13 Saudi dissident that was attacked?

14 A. Ghanem al-Dosari.

15 Q. Okay?

16 A. He's a well-known social media
17 activist with a verified account on Twitter. And
18 he's been interviewed, I believe, by 28
19 international media outlets, and his political video
20 comments. He's a YouTuber also, for political
21 matters.

22 Q. Mm-hm?

23 A. According to the Washington Post,
24 New York Times and The Times in London, has exceeded
25 120 million views.

1 Q. And that's pretty prolific in social
2 media?

3 A. Yes.

4 Q. So it's fair to say he has impact?

5 A. Yes.

6 Q. Through his social media accounts?

7 A. Yes. Yes.

8 Q. And would he be viewed, in your
9 opinion, as a threat to anybody that he had
10 information against?

11 A. What he says was considered a threat
12 to probably the Saudi government.

13 Q. So his words have impact that's
14 harmful to --

15 A. Yes.

16 Q. The Saudi government?

17 A. Yes. Yes.

18 Q. Okay. So you were invited over to
19 Qatar?

20 A. Yes.

21 Q. All right. And when was your first
22 meeting?

23 A. The first invitation I didn't accept
24 because I wanted to be a little bit more cautious.

25 Q. Okay.

1 A. They tried months after that. It
2 was, I believe, in May.

3 Q. Of 2018?

4 A. Yes, like three months, four months
5 ago. That was the second one.

6 And he said: "We have been begging you to
7 come to Doha. We would like to show you around." I
8 said, well, it's 14 -- I explained to them that a
9 14-hour flight to see a supermarket is not worth the
10 flight.

11 Q. I mean, maybe it's a Whole Foods.

12 A. Not worth the flight and the... And
13 he said: "Well, okay, let's talk on Signal." And
14 that's when we switched to Signal.

15 Q. Okay. How were you previously
16 speaking?

17 A. WhatsApp.

18 Q. Via telephone or messages? Or both?

19 A. Both. Both. Both.

20 Q. Okay.

21 A. Sometimes would do the video. He
22 would want to show me some documents that he doesn't
23 want to send copies of.

24 Q. Okay?

25 A. Very sensitive political documents.

1 Q. And that was via WhatsApp?

2 A. WhatsApp.

3 Q. And why did you switch to Signal?

4 A. He did. He asked me to speak to
5 Signal. He said it's more secured --

6 (Query by reporter)

7 He asked me to switch to Signal because,
8 according to him, WhatsApp has been hacked before.
9 And he wanted a secure line, and he said: "Let's go
10 to Signal because it hasn't been hacked yet."

11 Q. And did he say who Whatsapp had
12 hacked -- who had hacked WhatsApp?

13 A. Yes, I asked that question. He said:
14 "The three of us." I said: "What three of us?" He
15 said: "Us, Emiratis and Saudi, we hacked. We hack
16 into each other's systems through --"

17 Q. WhatsApp?

18 A. WhatsApp.

19 Q. Okay.

20 A. And regular. And of course when I
21 got there, I found out that they literally hack
22 everything.

23 Q. "Everything" being?

24 A. E-mails, text messages, regular phone
25 calls, laptops. Anything you can think of. They

1 hacked into all that. They have...

2 Q. So telecommunications?

3 A. Yes.

4 Q. And "electronic" means?

5 A. E-mails. Everything. Laptops,
6 phones, cellphones, cameras.

7 Q. And they being the country of Qatar
8 or does somebody else do that?

9 A. Well, no. Someone does that for them
10 to keep it from being tracked to Qatar. So they
11 hired... They deal with an Italian, a group of
12 three Italians. They call them "the engineers."

13 Q. Okay?

14 A. They are stationed in Italy, and they
15 get paid really well by the Government of Qatar.
16 And there is also, they connect with an underground
17 intelligence unit.

18 Q. Okay?

19 A. A group of people being paid
20 salaries, really good salaries, to just create fake
21 accounts.

22 Q. Mm-hm?

23 A. On Twitter, Facebook, WhatsApp, fake
24 numbers.

25 Q. Mm-hm?

1 A. And they do serve political purposes.
2 The engineers specialize in hacking.

3 Q. Okay?

4 A. From a location in Italy, they didn't
5 want to say. But those engineers have been going
6 back and forth to Doha. Or sometimes they -- but
7 they don't go directly. And then they were asked
8 not to fly to Doha, so they arranged for
9 instructions to be conveyed in person. A private
10 jet would go to London or to any European
11 destination; from there they connect. So they
12 established a network. And according to them:

13 "They say we're doing what the others are doing."

14 Q. It's okay to do it because everybody
15 else is doing it?

16 A. Basically, yes. And he said:
17 "Saudis, Emiratis are doing it. We can do it too."

18 (Query by reporter)

19 Emiratis, yes, are doing it "and we are
20 doing it but we beat them at the money we pay."

21 That's what he said.

22 Q. "The money we pay"?

23 A. Yeah. They pay a lot of money. He
24 said --

25 Q. The Government of Qatar?

1 A. Yes.

2 Q. Okay. More so than other people?

3 A. More so than other people, yes.

4 Q. Okay?

5 A. A lot more.

6 Q. And where does Qatar's money come
7 from?

8 A. Oil and gas. They don't work for it,
9 they said. They always joke about the fact that --
10 he said: "If there is a chosen nation on earth, by
11 God, he said, "it should be the Qataris. We don't
12 work. We sleep in. And when we get up every
13 morning, the ground underneath us is making \$100- to
14 \$200 million in gas and oil, which we don't even dig
15 ourself. We bring foreigners to dig it. We give
16 them a salary and we just use it."

17 So it's all gas and oil, which won't stop
18 pumping until, I think, another 220 years. So...

19 Q. So the Government of Qatar is
20 confident in its position to remain in power, at
21 least from an economic standpoint?

22 A. Yes, he said, and from my meetings
23 there with the top officials, they were under the
24 impression maybe a week after the siege started that
25 --

1 Q. Siege being?

2 A. Qatar -- I mean the Emiratis --
3 Emirati-Saudi siege.

4 Q. Mm-hm?

5 A. Against Qatar.

6 They were worried in the first few weeks,
7 they told me, he said, "but after that, we knew
8 that's it. We knew the trick. Money. We just need
9 to control the people who control them."

10 Q. So money is their control?

11 A. Yes. And they use it without limits.

12 Q. Okay. So you flew over there
13 finally?

14 A. Finally I accepted because he
15 actually spoke to me on Signal and said: "The big
16 boss wants to meet you in person."

17 Q. Who's the big boss?

18 A. I was under the impression it would
19 be the ruler of Qatar.

20 Q. Mm-hm?

21 A. Who is the big boss. But when I
22 arrived there, it was Mohammad Al-Masnad is the big
23 boss.

24 Q. Who's the Emir of Qatar?

25 A. Tamim Al Thani.

1 Q. Okay. And have you ever met with
2 him?

3 (Query by reporter)

4 THE WITNESS: Sorry.

5 BY MS. CASTANEDA:

6 Q. Have you ever met with him?

7 A. No.

8 Q. You've never met him in person?

9 A. No.

10 Q. So who did you meet with?

11 A. I met with Mohammad Al-Masnad. I met
12 with Abdullah Al-Athbah. I met with the deputy
13 director of intelligence. I met with the two --
14 Mohammad Al-Masnad's also right-hand man. I met
15 with --

16 Q. Who's that?

17 A. A gentleman, last name, Al-Khulaifi.
18 He's also in the news and the pictures. Wherever
19 Mohammad Al-Masnad goes, this guy goes with him.
20 He's his right-hand man.

21 Q. Okay.

22 (Query by reporter)

23 Wherever Mohammad Al-Masnad goes, his
24 right-hand man will be with him, and he's in the
25 media. Like, any picture published of Mohammad

1 Al-Masnad, he will be the guy sitting to the right,
2 with a beard.

3 I met with him. I met with the deputy
4 director of intelligence, who is also always with
5 Mohammad Al-Masnad wherever he goes on missions.

6 Q. Okay?

7 A. My meeting with Mohammad Al-Masnad
8 was inside the royal palace of the Emir of Qatar, in
9 his private chamber, his private office.

10 Q. Mm-hm?

11 A. They chose that location for two
12 reasons, according to my understanding, is that as a
13 show of respect to me.

14 Q. To you?

15 A. Yes. And also to secure that nobody
16 can hear anything. Apparently it is the most
17 secured electronically location outside the CIA.

18 Q. And whatever they said to you, if you
19 know, so no one can hear anything, who is -- who are
20 the people that they're concerned with hearing, if
21 you're in the middle of the country?

22 A. They are concerned that these
23 conversations or their details will be heard by
24 either the Saudis or the Emiratis from -- through
25 their "moles," as they call them, or their

1 electronic devices that they also paid money to
2 recruit.

3 Q. Mm-hm?

4 A. Against the Qataris. And most
5 importantly, CIA.

6 Q. Okay. So within the palace, there
7 are moles?

8 A. That's what I understood from them.
9 So that's why, when I walk in, they take my
10 cellphone, they take their cellphones, and they say:
11 "As a show of respect we are putting our cellphones
12 --" they put it in a box with equipments --

13 Q. Mm-hm?

14 A. -- around it. And they keep it
15 outside the royal office.

16 Q. Okay. So the only things in this
17 room are people?

18 A. People.

19 Q. Without any electronics?

20 A. Yes. But of course, fancy furniture,
21 all gold-plated and made of gold. But, yeah.
22 Individuals.

23 Q. So this room is a room made to
24 impress and made to actually do real business?

25 A. This room is atta--- is actually

1 located inside the ruler's private chamber.

2 Q. Okay.

3 A. So --

4 Q. Private chamber being a bedroom or?

5 A. No, his office. His office.

6 Q. Okay.

7 A. The office where he discusses the
8 most sensitive topics with the government ministers.

9 Q. Now, is it he the one who's
10 discussing or is it other people that are actually
11 making decisions on behalf of the government? If
12 you know?

13 A. I don't know if -- how it works, but
14 they explained it to me that this is the most
15 secured room.

16 Q. Okay.

17 A. In the world. And this is where the
18 Emir sits. And they said: That's his chair; that's
19 his door; that's his private meeting room.

20 And that's where I sat down with Mohammad
21 Al-Masnad and deputy director and the other
22 individuals I've mentioned.

23 Q. Okay. Does it strike you as either
24 odd and/or surprising that the Emir himself was not
25 there to speak with you about things that the

1 Government of Qatar felt were so important?

2 A. Maybe. I thought he would be there,
3 but then when I, after a couple of hours of talking,
4 I understood that the Emir of Qatar doesn't want --
5 he's not in charge. Mohammad --

6 Q. He's not in charge?

7 A. No. Mohammad Al-Masnad runs the
8 show. I was on my way to the palace in the morning,
9 and with an assigned bodyguard and driver from the
10 intelligence. And Abdullah Al-Athbah called me to
11 say that: "The foreign minister just found out that
12 you're here."

13 Q. Mm-hm?

14 A. "And he would like to have lunch with
15 you. And we told him you're busy." And I said:
16 "Why is that?" He said: "Why would you care to
17 meet with a secretary when you are going to meet
18 with the CEO?" CEO meaning Mohammad Al-Masnad.

19 Q. Mm-hm.

20 A. So the foreign minister of Qatar is
21 also deputy prime minister and he's a member of the
22 ruling family.

23 (Query by reporter)

24 The Emir of Qatar, yeah, after a couple of
25 hours, I was convinced that the Emir of Qatar does

1 not run the show and Mohammad Al-Masnad is in charge
2 of everything. He is also the Emir's uncle.

3 Q. Okay?

4 A. He is also the first cousin to the
5 Emir's mother. And the Emir's mother is the real
6 king of Qatar. So --

7 Q. She's a queen.

8 A. Well, they call her the king; I said:
9 "The queen --"

10 Q. She's really the king?

11 A. Yeah. Because in the Middle East you
12 have to -- I said: "Why would you call her the
13 king? He said: "Because we don't allow queens to
14 rule." He said: "Women are not allowed to rule or
15 have power, so they prefer to call her king."

16 Q. And what is her name?

17 A. Sheikha Moza al-Missned. Just same
18 last name as Mohammad Al-Masnad. And what I was
19 informed is that she appointed Mohammad Al-Masnad
20 back in 2006 or '07, when --

21 Q. She herself?

22 A. She herself. She decides.

23 Q. But she doesn't have the power to do
24 that, at least to the --

25 A. Nothing official.

1 (Query by reporter)

2 Q. Do we need to go back? Okay.

3 So how --

4 A. Officially she doesn't have any title
5 except her charity foundations.

6 Q. Mm-hm?

7 A. But off the record, she decides the
8 policies. And she meets with Mohammad Al-Masnad,
9 she meets with government ministers, and she
10 decides.

11 Q. And how did she come into this
12 position?

13 A. Well, she belongs to a family --
14 al-Missned is actually a family that was so opposed
15 to the rulers of Qatar, back in the 1950s and the --
16 and they fled Qatar and they went to Kuwait.

17 Q. Mm-hm?

18 A. As opposition family.

19 Moza al-Missned is probably the smartest
20 woman I've ever heard of. She vowed, because her
21 father and her family were kicked out and fled with
22 nothing and went to Kuwait...

23 Q. Mm-hm?

24 A. She vowed to not only get her family
25 back but she will be the ruler of Qatar one day.

1 Q. She herself?

2 A. She herself.

3 Q. In any way that it needed to happen?

4 A. By all means necessary.

5 Q. Okay?

6 A. And she found a way, through the
7 international fashion industry or whatever, to
8 connect with the son of the Emir of Qatar.

9 Q. Mm-hm?

10 A. Who is Tamim's father -- because the
11 ruler of Qatar is her son.

12 Q. Mm-hm?

13 A. And she managed to get him to fall in
14 love with her and then marry her and leave his other
15 four or five wives and their children. And she
16 managed to eliminate her opponents one after
17 another, and...

18 Q. Which number of wife is she, if you
19 know?

20 A. She is the, I think, either the fifth
21 or the sixth. The last one. The last one.

22 Q. Okay?

23 A. Nobody after that.

24 Q. She was the final?

25 A. She's the final. And she --

1 according to the Qatari constitution, the current
2 ruler, her son, Tamim, shouldn't be a ruler. The
3 Emir of Qatar from his first wives, he has older
4 sons.

5 Q. Mm-hm?

6 A. And she managed to put them on the
7 side.

8 Q. Internally negotiate?

9 A. No. She gave them one of two
10 choices: Either we accuse you of being insane and
11 we throw you in a mental institute; or you just
12 voluntarily accept the fact that her son is going to
13 be the ruler. Her son is also the second son, her
14 own son.

15 Q. Mm-hm?

16 A. So her eldest son wasn't fit. So she
17 convinced him to step aside, and she put Tamim, the
18 current one. And she decides which minister should
19 hold which Ministry.

20 Q. Mm-hm?

21 A. And for how long. So one of the
22 Emir's sons was sent to a mental institute, who is
23 still there now, and because he complained that he
24 should be in line to become the ruler.

25 Q. Mm-hm?

1 A. He is way older than the current
2 ruler, but he's from the other wife.

3 Q. And where is he, if you know, where
4 is he held?

5 A. They say he's in some hospital in
6 Qatar.

7 Q. Within their country?

8 A. Within their country, yes. They
9 don't allow them to go outside because then the
10 scandal will be... So she eliminated everybody who
11 could have posed a threat to her son and her power.

12 Q. In her line?

13 A. Her line.

14 Q. Okay.

15 A. And she appointed her son -- her
16 second son, which is Tamim.

17 Q. Mm-hm?

18 A. Her first son wasn't fit for also.

19 Q. Where is he?

20 A. He's in Qatar. He's in Doha. They
21 give him honorary titles, and probably \$500- to 700
22 million a year to..

23 Q. Play?

24 A. To play.

25 And he agreed. He's not fit to be a ruler

1 for psychological reasons. So Tamim was the one
2 appointed, but also Tamim is not trained for all
3 this. So he understood that he will be a ruler in
4 title but real rulers are Mohammad Al-Masnad, his
5 mother.

6 Q. Mm-hm?

7 A. And the Palestinian Azmi Bishara.
8 He's the head of the Qatar think tank in Doha.

9 Q. Okay.

10 A. But really, he is probably the second
11 most powerful man in Qatar.

12 Q. And Sheikha Moza appointed all of
13 them?

14 A. Sheikha Moza influences a lot of
15 decisions. Lots of decisions are made based on
16 whether or not she's okay with that.

17 And she also made sure that the former
18 Prime Minister of Qatar, when he left Qatar, will
19 not think about coming back to power so she got him
20 busy --

21 Q. Mm-hm?

22 A. -- with a lawsuit filed by another
23 Qatari in London courts. And that kept him --

24 Q. Occupied?

25 A. Occupied. And because he left his

1 position as Prime Minister of Qatar.

2 Q. Mm-hm?

3 A. And he was one of the most
4 influential people in the world, but he was forced
5 to resign. And the deal was he keeps all the money
6 he took. I think it was around \$15- to \$16 billion
7 he stole.

8 Q. "Billion" with a "b"?

9 A. "B," yes. So the deal was: Resign,
10 go to London.

11 Q. Mm-hm?

12 A. And you can keep the money. Nobody
13 will ever bother you. But leave my son alone.

14 So her son became ruler and that guy went
15 to London. But then she instigated a lawsuit to
16 keep him from thinking about anything else. And
17 then, when she instigated a lawsuit, the lawsuit
18 became a media coverage and very serious. She sent
19 a messenger to him and said: "Well, we can protect
20 you by giving you diplomatic status at the Qatari
21 embassy in London. Then you have immunity. If you
22 want me to do this favour, you have to ask." And he
23 knew, if he had asked for that favour, means he
24 cannot continue posing a threat. And that's what
25 happened.

1 So they gave him a very small title in the
2 Qatari embassy, which is registered with the Foreign
3 Ministry of the UK.

4 Q. Mm-hm?

5 A. As a diplomatic advisor, to justify
6 giving him diplomatic immunity.

7 Q. Diplomatic immunity?

8 A. And the minute he gained that, he was
9 saved from the lawsuit. But now he is saving
10 another scandal, which -- Barclays, because he also
11 took another £400 million, which is almost a
12 billion.

13 Q. Because the other billion he received
14 was not enough?

15 A. It was not enough.

16 Q. I mean, it is expensive, it's 2019,
17 so...

18 A. Yes it is. And that's why they need
19 more and more. And it's a small country. 250,000
20 people population. They wake up at the morning at
21 10 o'clock, and they work for an hour. And then
22 they go take a nap after lunch for five hours. And
23 that's the routine.

24 So you need somebody to run the show. And
25 there is no Parliament. There is no Congress.

1 There is nobody to watch who's spending what.

2 Q. Mm-hm?

3 A. So they can --

4 Q. There's no checks and balances. They
5 don't --

6 A. They do everything they want. And
7 although Qatar is the, now officially, the richest
8 country on earth, Qataris themselves are not seeing
9 all that wealth because a Qatari citizen -- which is
10 something I don't think the world knew or I didn't
11 know even until I got there -- they give them a loan
12 of \$300,000 to buy a house, when the cheapest house
13 in Doha is \$2 million.

14 So that's their way of saying to the
15 citizen: You need more money to live, come to the
16 government, borrow money, and pay us for the next 50
17 years. And that's it. And that's how they keep
18 them in need.

19 Q. Mm-hm?

20 A. But Qataris are -- they don't have a
21 say in anything. Nothing. They can't even decide
22 anything.

23 Q. So the Al Thani family is the
24 government?

25 A. The three individuals, yeah. They

1 are the government. The rest are public relations.
2 It's a birthday cake to them. Qatar is a birthday
3 cake.

4 Q. Mm-hm?

5 A. And they just divided it among them.
6 And they leave scraps to the people. But from the
7 outside, Qatar's the richest country on earth.

8 Q. Right. So you were invited to
9 Doha --

10 A. I was invited and I said to --
11 (Query by reporter)

12 Q. ... Doha, and you met with the power
13 of the country, in a secure room, with no
14 electronics?

15 A. Yes.

16 Q. What did you discuss?

17 A. Almost everything I wanted to ask.
18 And they made it very clear to me -- it was also
19 Abdullah al-Athbah was aware and present in many
20 meetings. And he said: "Now you're here. Whatever
21 you cannot ask us outside Qatar, you can ask us
22 now."

23 Q. Mm-hm?

24 A. "We will answer all your questions no
25 matter how embarrassing you think they might be.

1 Ask all your questions you need to know because we
2 will not answer these questions --"

3 Q. Outside?

4 A. "-- outside or by phone or by e-mail.

5 And I wanted to know if it's freedom to
6 speak about everything? Yes, everything. So we
7 discussed literally everything you can think of,
8 from Ilhan Omar; to briberies to politicians,
9 recruiting politicians; to Jamal Khashoggi's death;
10 to you, your case, and how they're going to do
11 everything in their power to make this lawsuit go
12 away and then frame you.

13 Q. Frame me personally?

14 A. Personally, to make sure that no
15 other woman will rise against Qatar again. They
16 will line up prominent reporters in the US to
17 sponsor this report. It was the first time I hear
18 about your case there. I didn't even know who you
19 were.

20 Q. It was in Doha when they presented it
21 to you --

22 A. The first time. A lot of topics were
23 discussed that I am aware of, so I asked them about
24 it.

25 Q. Mm-hm?

1 A. But they added that there is a
2 lawsuit that is going to happen. From the
3 conversation, I think they were monitoring your
4 clients' phones because they knew everything.

5 Q. Mm-hm?

6 A. And they knew they were planning on
7 filing a lawsuit. They knew about your name even
8 before you actually stepped in. How, I have no
9 idea.

10 Q. You mean, before this lawsuit was
11 filed?

12 A. Yes.

13 Q. Did they tell you that we were in
14 negotiations with an attorney in Miami to settle
15 this case before we filed?

16 A. Yes, they did. They brought up that
17 up and they said they are not interested in settling
18 because settling is admitting that something wrong
19 happened.

20 Q. Mm-hm?

21 A. And they don't want to admit to that.
22 And I said: "So then just issue a statement. If it
23 didn't happen, just issue a statement." He said:
24 "No. It happened. But we're not worried about what
25 those guys are saying. We're worried about what

1 will be dug up from under the desert sand." Which I
2 didn't understand. And then they said Khalid
3 Al Thani had killed people.

4 Q. Sheik Khalid Al-Thani?

5 A. Yes.

6 Q. The defendant named in this case?

7 A. Yes.

8 Q. Sheik Khalid bin Hamad bin Khalifa Al
9 Thani?

10 A. Yes. The person you are suing.

11 Q. One of the three defendants of this
12 case?

13 A. Yes. And he said -- they said that
14 they're not worried about what's being said in the
15 lawsuit, they're worried about what hasn't been
16 said. And he killed people, and he buried them.
17 And we don't want that to come up, so we'll just
18 make this lawsuit go away. And that's where your
19 name and your lawsuit came in.

20 And we discussed everything, from
21 Congresswoman Ilhan Omar's briberies, that they
22 are --

23 (Query by reporter)

24 Ilhan Omar.

25 (Query by reporter)

1 Briberies, and how they recruited her; all
2 the way to Jamal Khashoggi's murder and how they
3 played a major role in exposing him to the Saudis to
4 provoke the kind of a reaction.

5 Q. When you say "provoke" and "expose
6 him," what does that mean? Tell me a little about
7 him. How is he related to the Qataris?

8 A. Jamal Khashoggi, from my meetings, I
9 understood, like, I knew that Jamal Khashoggi and
10 Prince Al-Waleed bin Talal were very close friends.
11 And I knew from my negotiations with Prince
12 Al-Waleed then that somebody was leaking secrets --

13 Q. Mm-hm?

14 A. -- about the Saudi Royal Family that
15 they didn't want to be leaked. And they were
16 reaching specific media outlets that indirectly are
17 sponsored by Qatar from way before the siege
18 started.

19 Q. Okay.

20 A. So the Qataris apparently were in
21 cahoots with Jamal Khashoggi. Jamal Khashoggi would
22 receive sensitive secrets.

23 Q. Mm-hm?

24 A. From or through Prince Al-Waleed bin
25 Talal and other members of the ruling family, and he

1 leaks them to the Qataris. The Qataris would leak
2 them to media outlets that are...

3 Q. Willing to print that information?

4 A. Yes.

5 Q. In a light that was not favourable
6 Saudi --

7 A. Yes.

8 Q. -- Arabia?

9 A. Exactly.

10 Q. Okay.

11 A. So Jamal Khashoggi apparently, from
12 what I understood, was playing both sides. He was
13 misleading the Saudis by pretending to be their
14 friend --

15 Q. Mm-hm?

16 A. -- as a Saudi citizen and as a former
17 advisor to the head of the Saudi Intelligence, and
18 he's part of the system.

19 Q. So he's a former advisor to Saudi's
20 Intelligence.

21 A. Yes. Prince Turki Al Faisal was head
22 of the Intelligence.

23 Q. Mm-hm?

24 A. And then he was appointed ambassador
25 of Saudi in the UK, and then ambassador of Saudi

1 Arabia in Washington.

2 Jamal Khashoggi was his advisor in all
3 these three positions. He was also the secret
4 messenger to Osama bin Laden from the Saudis; when
5 they wanted to deliver a message to Osama bin Laden,
6 they sent Jamal Khashoggi. And there are pictures
7 posted of Jamal Khashoggi carrying a machinegun in
8 Afghanistan after a visit with -- and he was a
9 member of the Muslim Brotherhood. I got that
10 confirmation from the Qatari officials.

11 Q. And he was a member until he was
12 killed?

13 A. Until he was killed.

14 Q. 'Til death?

15 A. Yes, 'til then. And he was on
16 Qatar's payroll. And they were paying him, buying
17 him.

18 Q. Do you know whenever he joined
19 Qatar's payroll?

20 A. Way long before Mohammad Musselman.

21 (Query by reporter)

22 ... the current Crown Prince of Saudi
23 Arabia, Mohammad Musselman, was appointed. Way
24 before that. He was on Qatar's payroll.

25 Q. And was he ever a journalist?

1 A. He was. He was a --

2 Q. Was he in intelligence before he was
3 a journalist?

4 A. Yes, and he was in intelligence while
5 he was a journalist. Being a journalist is the best
6 cover for any intelligence agency. When they want
7 to send someone in, they give him a title of being a
8 journalist. Or they recruited a journalist.

9 Q. Mm-hm?

10 A. Because that's the best way of asking
11 questions without raising a red flag. So Jamal
12 Khashoggi was a journalist, and for several years he
13 was working double agent thing.

14 Q. When you say "thing," was he a double
15 agent?

16 A. He was. I didn't know he was a
17 double agent until he was killed, but I got the
18 confirmation when I was in Doha.

19 Q. Okay.

20 A. The Qataris wanted him to die.

21 Q. Why is that?

22 A. Because he tricked them too. He was
23 leaking information to the Saudis, according to
24 them.

25 Q. Mm-hm?

1 A. That Qataris didn't want to be
2 leaked. So apparently, according to them, Khashoggi
3 was leaking Qatari info to the Saudis and leaking
4 Saudi info to the Qataris, collecting money from
5 both sides.

6 Hence why he had received the penthouse in
7 Istanbul paid for by the Qatari government, which
8 his fiancée now owns. And it was doctored up
9 without any legal justification for her to own it
10 because it wasn't --

11 Q. No --

12 A. She wasn't his wife.

13 Q. Right?

14 A. But because of her relationship, very
15 strong relationship, with the Turkish intelligence
16 and the President of Turkey, they changed the rules
17 for her and made an exception.

18 So she owns the penthouse, which was paid
19 for by the government of Qatar.

20 Q. Is she herself in intelligence or
21 labelled a journalist?

22 A. She's not a journalist but an
23 activist, according to her title.

24 Q. Mm-hm?

25 A. But she works with the Turkish

1 intelligence through the President of Turkey's top
2 advisor. They are very close friends. So she
3 co-operates with the intelligence.

4 Q. And the "activist" title, is that one
5 she gave herself?

6 A. Yes.

7 Q. Is that what she uses on social
8 media?

9 A. Yes. And that's what she used also
10 when she showed up in the conference a couple of
11 weeks ago.

12 Q. Mm-hm?

13 A. Where the owner of Amazon and the
14 owner of Washington Post was present and hugged her,
15 and they both were so sad that Jamal Khashoggi's
16 anniversary just came around. But it's all about
17 the money. These are not sincere cries.

18 Q. So Jamal's title as a journalist is
19 in media, obviously mainstream media. Who was the
20 first outlet, if you know, to print that that's who
21 he was or what he did?

22 A. In favour of his name, I think media
23 outlets owned by Qatar.

24 Q. Okay.

25 A. But some actually did publish -- I

1 don't recall the names but they did publish -- the
2 fact that he was involved with the Saudi
3 intelligence for, I think, 18 years.

4 Q. Mm-hm?

5 A. And he was a messenger who went to
6 Afghanistan. And according to the Qataris, Jamal
7 Khashoggi, when he fled to Washington, he made a
8 deal with the CIA.

9 Q. Washington, D.C.?

10 A. Yes.

11 Q. Okay, so the United States?

12 A. Yeah, United States, and that's where
13 he lived until he got killed.

14 Q. Okay. And the news shows that Saudi
15 Arabia was to blame for his death mainly?

16 A. Yes.

17 Q. Was that intentional on the part of
18 Qatar?

19 A. Yes.

20 Q. Okay.

21 A. I think the -- not I think, I know
22 the Qataris leaked specific things about Jamal
23 Khashoggi to the Saudis indirectly that provoked
24 them into deciding to kidnap him and bring him back
25 to Saudi Arabia. And that was the initial plan.

1 Q. Okay?

2 A. To kidnap him. And he wouldn't have
3 walked into the Saudi consulate without assurances
4 he got from the highest level of Saudi officials.
5 But the Qataris also said to him: Choose the Saudi
6 consulate in Istanbul because Turkey is Qatar's
7 playground.

8 Q. Mm-hm?

9 A. So he fell for it. And the Qataris
10 convinced him that's a good idea to go in and see
11 what they have to say.

12 Q. Mm-hm?

13 A. And that was last time he walked in.

14 Q. Walked in general.

15 A. In general. Yes.

16 Q. So the Qataris provided assurances
17 that led him to his death?

18 A. Yes. And leaked information about
19 him to the Saudis that provoked their anger.

20 Q. Right. So you mention that many
21 things were discussed in your closed-door
22 no-electronic meeting. And one of the things that
23 you mentioned was Ilhan Omar.

24 Was that name known to you before you flew
25 to Doha?

1 A. Yes.

2 Q. How?

3 A. They were talking about her on the
4 phone with me.

5 Q. "They" being Qatar?

6 A. Qatar, yes. And they call her Sister
7 Ilhan, which is a term you only use when you're a
8 member of the Muslim Brotherhood. So Abdullah
9 al-Athbah, he refers to Ilhan Omar as Sister Ilhan,
10 and Sister Linda, which is Linda Sarsour, which is
11 the other activist who is now going to run for
12 Senate.

13 Q. Mm-hm? These are Americans?

14 A. These are Americans, yes. Linda
15 Sarsour is a well-known activist, and Ilhan Omar is
16 a Senator. But I knew they recruited Ilhan Omar
17 from even way before she thought about becoming a
18 government official.

19 Q. They recruited her. So Qatar
20 recruited --

21 A. Qatar recruited her.

22 Q. -- Ilhan Omar. And what does that
23 mean?

24 A. That means they groomed her and
25 arranged the foundation, the grounds, for her to get

1 into politics way before she even showed interest.
2 They convinced her. And they considered that --
3 consider her the "jewel of the Crown," as they
4 called her.

5 Q. Jewel of Qatar's crown?

6 A. Yes. And their Trojan horse. And in
7 one comment, they referred to her in a very
8 derogatory way, saying: "If it wasn't for our
9 money, she will be another black Somali refugee
10 working part-time at Starbucks." That's it.

11 Q. Did they seek her out?

12 A. Yes. There was -- I think from my
13 understanding they, somebody, recommended her to the
14 Qataris. They had several names, several options to
15 pick from, to appoint -- 'cause they call her
16 winning the elections is an appointment.

17 Q. Mm-hm?

18 A. He said: "We appointed her in the
19 Senate." He said: "We were considering several
20 names to appoint in the Senate but we settled on
21 Ilhan because of her father's history."

22 Q. And what is that?

23 A. Very violent interrogations. He was
24 part of the unit in charge of interrogating military
25 opponents in Somalian army. He was a general, I

1 think, or high-ranking officer who also had history
2 of making visits to the US and military ties with
3 the US when the regime was full general in charge of
4 Somalia.

5 Q. Mm-hm?

6 A. Her father has a history of
7 interrogating people very violently, and they
8 thought that would be very suitable because the more
9 dirt you have on your candidate, the easier to
10 control the candidate.

11 Q. Mm-hm?

12 A. Because you can only remind them that
13 "maybe you can leak all this stuff."

14 So they apply the Mafia style. They
15 recruit someone when they know they can trace
16 everything about them to use it against them if they
17 don't obey orders.

18 Q. Is her father labelled a terrorist by
19 anybody?

20 A. No.

21 Q. Does he engage in terrorist
22 activities in any country that you know of?

23 A. No.

24 Q. So he has a violent history and past?

25 A. Well, he was an interrogator in the

1 Somali army, yes. He was an officer.

2 Q. And that's, as far as you can tell,
3 generally frowned upon?

4 A. Yes. But I think there were other
5 reasons for them to specifically choose Ilhan Omar.

6 Q. Mm-hm? So she's from Somalia; she's
7 an American now, correct?

8 A. Yeah. She came as a refugee to the
9 US. And that's why the specific Muslim Brotherhood
10 organizations, they seek out specific people at
11 specific locations.

12 Q. Mm-hm?

13 A. And they groom them.

14 Q. Okay?

15 A. And of course they said that she had
16 to swear allegiance to the Turkish President,
17 Erdogan.

18 Q. She -- they -- so Qatar told her she
19 had to swear allegiance to Turkey?

20 A. That's what they told me.

21 Q. Right?

22 A. That she swore allegiance to the
23 President of Turkey, Erdogan. Hence some pictures
24 were published.

25 Q. Mm-hm?

1 A. With her meeting with Erdogan before
2 she became a Senator. And the initial meeting, it
3 was her and a group of people too. And they showed
4 me a picture of her with Erdogan. The way she was
5 sitting, they said, this is -- "She's sitting like a
6 student facing the principal after doing something
7 bad." And~Erdogan, the picture, you can see him
8 crossing legs with his shoe facing her. And they
9 said: "There you go."

10 Q. So the body language of that photo
11 spoke volumes?

12 A. Yes.

13 Q. About that situation?

14 A. About that situation.

15 So to them she is the Trojan horse,
16 because she sits in a very sensitive committee and
17 she has access to information that the US doesn't
18 want to be leaked out.

19 Q. Was that Qatar's goal?

20 A. One of the goals, yes.

21 Q. To have access to information --

22 A. To information.

23 Q. -- that, publicly available?

24 (Query by reporter)

25 A. Yes.

1 Q. Does that include classified
2 information?

3 A. Yes.

4 Q. Okay. So she was groomed by Qatar?

5 A. Yes.

6 Q. To reach the position which she
7 currently holds in the United States Government in
8 2019?

9 A. That's what they told me.

10 Q. And she was funded by them? I'm
11 assuming that campaigning costs money.

12 A. Yes. They were the main source of
13 her money, but it was disbursed and delivered in
14 many different methods, including some guy opening a
15 PayPal, I believe; they brought that up.

16 Q. Mm-hm?

17 A. They sought every possible method to
18 provide money without raising a red flag.

19 Q. And they picked her because she was
20 weak and vulnerable to the information that they
21 had?

22 A. Yes. And they -- apparently she did
23 not object to any of the demands that they set as
24 conditions to appoint her in the Senate.

25 Q. Do you know what those were or are?

1 A. No.

2 Q. Okay.

3 A. No. But full obedience and...

4 Q. To a foreign government?

5 A. Yes.

6 Q. That is Qatar?

7 A. Definitely Qatar, yes.

8 Q. Okay.

9 A. And sometimes favours for the Turkish
10 government. But it has to come through Qatar.

11 Q. So, Turkish favours as voiced by the
12 Government of Qatar?

13 A. Correct.

14 Q. Okay.

15 A. Yes. And Ilhan Omar didn't show any
16 objection to that, according to the Qataris. I
17 never had direct contact with her, but according to
18 them, yes. And given the fact that she's such an
19 obedient "element," as they call her, they wanted to
20 make sure that nobody can go after her reputation.

21 Q. Mm-hm?

22 A. And that's how they brought up the
23 name of Imam Tawhidi.

24 Q. Mm-hm?

25 A. A social activist who was exposing a

1 lot of that.

2 Q. So if Qatar is going after Imam
3 Tawhidi because he is critical --

4 A. Of-

5 Q. Publicly critical of Ilhan Omar?
6 Publicly critical of Ilhan Omar?

7 A. Correct.

8 Q. And how is he publicly critical of
9 her?

10 A. He obtains information that is solid
11 and confirmed that exposes her true activities.

12 Q. Her allegiance to the Government of
13 Qatar, not to the Government of the United States?

14 A. Correct. And apparently she doesn't
15 like that at all. So the Qataris have asked me if I
16 can do this favour for them in addition to helping
17 them recruiting other people, politicians and
18 newspaper reporters: If I could arrange for a
19 lawsuit against Tawhidi that it will allow Ilhan
20 Omar to capitalize on and sue him for defamation of
21 character.

22 Their plan was to drum up information
23 about Imam Tawhidi that are not true.

24 Q. Mm-hm?

25 A. And then turn them into a media

1 report in one of the prominent newspapers in the US.
2 And then that turns into a possible lawsuit, which
3 they asked me if I'm willing to sponsor the legal
4 action part.

5 Q. They asked you to engage in criminal
6 activity --

7 A. They asked me --

8 Q. -- knowing that information published
9 in a newspaper was untruthful --

10 A. About --

11 Q. -- and would be the basis of a
12 fraudulent lawsuit?

13 A. Yes.

14 Q. And what did you say?

15 A. I said, "I don't do that." I said,
16 "I don't do that. And unless you really have
17 evidence against the guy, I'm not going to do that
18 because I don't see anything wrong with him exposing
19 secrets that are true."

20 Q. Mm-hm?

21 A. If she's doing all these things he's
22 saying she's doing, I won't be able to sleep at
23 night, knowing that I sent the guy to jail or based
24 on false accusations.

25 They said: "It will be a major favour for

1 Ilhan Omar and she will return the favour any way
2 you want." I said: "No, I don't need her favours."

3 Q. And what did you understand that to?

4 A. I have no idea. But from my
5 discussions in Doha, Ilhan Omar is co-operating with
6 the Qataris in providing them with information that
7 it shared with the Iranian government. And they
8 also claim that some officials in the US are aware
9 of this co-operation between Qatar and Ilhan Omar,
10 specially within her party. And --

11 Q. Political party?

12 A. Yes.

13 Q. Okay?

14 A. And they said some, not all of them
15 but some.

16 Q. Mm-hm?

17 A. They didn't tell me the names but
18 they said, according to Ilhan, she got her base
19 covered. So even if they know about her, they need
20 her.

21 Q. Mm-hm?

22 A. To do some favours for them within
23 the Senate, so they will look the other way.

24 And also, they used her to recruit more
25 Senators, at least for the time being. They brought

1 it down. They said the best thing money can buy are
2 American officials because they are the cheapest of
3 the cheapest costing officials in the world. He
4 said British officials, they demand millions.

5 Q. Mm-hm?

6 A. To be recruited. American
7 politicians, some of them accept \$50,000. And they
8 brought names on specific American officials that I
9 prefer not to mention. And they told us -- they
10 told me that they came to Doha, and they --

11 Q. American officials?

12 A. American officials. They came to
13 Doha, they got paid, and the Qatari have taped the
14 entire conversation.

15 (Query by reporter)

16 The Qatari intelligence have taped
17 secretly all their conversations with every American
18 official who asked the Qataris for money. And they
19 did the same thing with American newspaper --
20 American reporters.

21 Q. So when Qatar asks somebody to do
22 something for them, it's recorded?

23 A. Everything.

24 Q. Audio?

25 A. Audio. Secret video.

1 Q. Video?

2 A. And...

3 Q. And why do they do that?

4 A. To use it against them if they try to
5 break away from the recruitment.

6 Q. So does the Government of Qatar
7 record anybody that they have asked to do a favour
8 for them for leverage?

9 A. Everybody.

10 Q. To use against them at a later date?

11 A. If they decide to --

12 Q. If needed?

13 A. -- disobey, yes.

14 Q. Okay?

15 A. They said they don't use it unless
16 they disobey them. And they somehow, if need be,
17 some officials would be indirectly hinted to them
18 that: "Remember that trip you made to Doha?"

19 Q. Mm-hm?

20 A. "Somebody was taping it for some
21 reason."

22 Q. And that would be an issue because
23 it's illegal to work for a foreign government?

24 A. Yes.

25 Q. If you're in the United States

1 Government?

2 A. Exactly. And if they leak that --

3 Q. Unless you properly notify whoever it
4 (sic) needs to know?

5 A. Which they didn't. Most American
6 official -- not most, some American officials
7 accepted money from Qatar without notifying.

8 Payments --

9 Q. That would be considered a foreign
10 contact, correct?

11 A. Yes. Yes. And the Qataris are fully
12 aware. And they have videos and pictures of
13 American officials in Doha asking, discussing money,
14 and how it's going to be filtered.

15 Q. Mm-hm?

16 A. Away from the media or American
17 government officials who are actually sincere about
18 their jobs.

19 The Qataris have leaked to the Iranian
20 government sensitive information about the American
21 military base in Al Udeid.

22 (Query by reporter) Al Udeid, it's an American
23 military base in Doha, in Qatar.

24 They leaked it to the Iranians and the
25 Iranians know everything about everything, American

1 activity.

2 The Qataris also brag that they need more
3 of Sister Ilhan in the Senate because, once the
4 "orange man" is out, and his greedy demands, as they
5 call him --

6 Q. Mm-hm?

7 A. They refer to Trump as "the orange
8 man."

9 Q. Trump is "the orange man"?

10 A. Trump is "the orange man." And they
11 refer to Jared Kushner as the "descendant of pigs
12 and apes" because he's Jewish.

13 Q. Because he's Jewish?

14 A. Yes. And they refer to other
15 American Senators and Congressmen who are Christians
16 as "Crusaders," and -- because Qatar is even more
17 Wahabi~than Saudi Arabia.

18 Q. And what does that mean?

19 A. The extremists of the extremist
20 faction of Islam is Wahabi, which is what Osama bin
21 Laden is, what Al-Qaeda is.

22 Q. Mm-hm?

23 A. Hence why all I see in the resort
24 where I was staying are leaders of Taliban, Iranian
25 officials, and Muslim Brotherhood leaders sitting in

1 the lobby dining.

2 Q. Mm-hm?

3 A. 'Cause they all had bodyguards and
4 that resort is strictly for secret government
5 guests.

6 Q. Not for your traditional tourists?

7 A. No. No. And everybody had a
8 bodyguard. Electronic gates when you enter or exit.
9 Everybody wants to know why you're there.

10 Q. Mm-hm?

11 A. Every floor has its own secret code
12 to enter so nobody sees the other.

13 Q. Mm-hm?

14 A. And I was a guest of the royal
15 palace, so I get to see everybody.

16 Q. Of which country?

17 A. Several countries. And what was
18 noticeable to me, I mean, to see western officials
19 there wasn't shocking but to see leaders from
20 Taliban, Muslim Brotherhood.

21 Q. Mm-hm?

22 A. And other Egyptians who I heard,
23 overheard, talking over the breakfast buffet in the
24 morning.

25 Q. Mm-hm?

1 A. And I know that they are wanted in
2 Egypt.

3 Q. Mm-hm?

4 A. They're all living there. Some of
5 them are living in the resort for the past seven
6 months. Qatar pays for everything. The Government
7 of Qatar pays for everything.

8 Q. And they're living there to avoid
9 accountability? Justice?

10 A. Or being arrested, yes.

11 Q. Okay. I want to go back a little bit
12 to Ilhan Omar again. So she was recruited by the
13 Government of Qatar before she was a member of the
14 United States Government?

15 A. That's what they told me.

16 Q. Okay. And they saw her as a
17 vulnerability, somebody that they -- who had
18 vulnerabilities, rather, and they agreed to fund
19 her?

20 A. Yes.

21 Q. And they did so in numerous ways?

22 A. Yes.

23 Q. And were they aware or was she
24 married at the time?

25 A. I didn't ask that but they mentioned

1 to me that -- I said: Why would a woman in hijab --
2 because I was under the impression that she's a
3 devout Muslim.

4 Q. Mm-hm?

5 A. I said: A woman in hijab takes
6 bribes? They said: "Don't be fooled by her head
7 scarf. She's a sex maniac, and she is very weak
8 when it comes to money and sex. And we got both.

9 Q. So they used those two factors to
10 influence her?

11 A. That's what they referring to.

12 Q. Did they fund her before she first --
13 you said they funded her before she first became an
14 American official in any way?

15 A. Yes.

16 Q. And did they continue to fund her
17 since that date?

18 A. Yes.

19 Q. And they fund her now?

20 A. According to the last conversation
21 with them, yes.

22 Q. And who's "them"?

23 A. Abdullah Al-Athbah, Mohammad
24 Al-Masnad, the Qatari official deputy director of
25 intelligence.

1 (Query by reporter)

2 Abdullah Al-Athbah, who is in the
3 subpoena; Mohammad Al-Masnad, who is in the
4 subpoena; and deputy director of intelligence. He's
5 not in the subpoena.

6 Q. Are they aware that she may have
7 married her brother?

8 A. Yes. They are aware of all her, as
9 they call it, "dirty deeds."

10 Q. And how do you say that in Arabic?

11 A. "Aemal al wasre" (ph.). They are
12 aware of all of that, and the more the merrier to
13 them.

14 Q. Because it's power for them?

15 A. Yes.

16 Q. And they use it against her if
17 needed?

18 A. Yes, and use it as a method to
19 protect her. No American media outlet that is
20 getting paid by Qatar has spoken about her sexual
21 scandals.

22 Q. Mm-hm?

23 A. Because they were ordered not to. So
24 they tell her, the Qatari officials tell Ilhan
25 through a third party: "Don't worry about it. You

1 won't read about it in really influential media
2 outlets in the US."

3 Q. And to them, to Qatars, I guess the
4 reasoning is based on that mainstream media is the
5 one that matters when it comes to saying things?

6 A. Yes.

7 Q. Okay.

8 A. And they made that very clear to me
9 that they needed me to help them recruit new
10 reporters. Important reporters.

11 Q. Mm-hm?

12 A. For example, they don't care about
13 German media outlets. French.

14 Q. Why is that?

15 A. They said they have no influence in
16 international --

17 Q. Politics or influence?

18 A. Politics, yeah. Only focus on --

19 Q. The business?

20 A. UK and US. That's it.

21 Q. United Nation and the United States?

22 A. That's it.

23 Q. Okay.

24 A. So --

25 Q. And who did they tell you to

1 specifically target?

2 A. Not target. They said that some of
3 them will approach me. They said: "We will leak to
4 them some information that will be a good thing to
5 publish as a report, and then we will suggest to
6 them to contact Alan Bender. And when they contact
7 you, suggest to them meeting, and see --"

8 Q. You meet with them?

9 A. I meet with them.

10 Q. Okay.

11 A. To see if I could recruit them.
12 Which is not something new.

13 Q. Mm-hm?

14 A. Governments do that all the time to
15 try to recruit reporters. And many of those
16 reporters are actually digging information to
17 publish, not to really publish but to use as a
18 reason to contact the embassy of those Gulf states
19 to say: "I have this report."

20 Q. Mm-hm?

21 A. "What do you want me to do with it?"

22 Q. Mm-hm?

23 A. So they say to him: "Can we talk?"
24 And that's how they recruited some American
25 reporters.

1 Q. Okay?

2 A. Who got paid. I was aware of that.

3 I have specific names that I know who were recruited
4 by Qatar. And they are working in well-known media
5 outlets. And they are on Qatar's payroll. And they
6 can't get out of it.

7 Q. Does that include The New York Times?

8 A. I'd rather not mention specific names
9 but I have, yes, several names in -- that I am told
10 that we have reporters in -- they said they have
11 reporters in New York Times who work for them.

12 Q. Mm-hm?

13 A. Washington Post.

14 Q. Mm-hm?

15 A. And some other media outlets. They
16 said: "We have some people in CNN."

17 Q. Who at CNN?

18 A. I'd rather not say 'cause I know the
19 name and details and...

20 Q. Is this an individual who has
21 influence in the media?

22 A. Yes. Yes.

23 Q. Is it a man or a woman?

24 A. A woman.

25 Q. And Qatar funded this person to be in

1 their position that they're in?

2 A. That's what they said to me, yes.

3 Q. And how much does Qatar pay
4 journalists, if you know the going rate or how
5 that --

6 A. It depends. He said some American
7 journalists are so cheap they ask for \$5,000. We
8 give them 7.

9 Q. For an article or per month or?

10 A. For an article.

11 (Query by reporter)

12 They would ask for just \$5,000 to, not to
13 print a report.

14 Q. Not to print?

15 A. Not to print.

16 Q. So not printing is also a statement?

17 A. Oh, yes. But if they approach a
18 reporter to print, the price changes. It goes to
19 triple, double.

20 Q. Okay?

21 A. But --

22 Q. So Qatar will approach journalists,
23 or be approached, and will put them on payroll in
24 that way?

25 A. They pay both ways. If you don't

1 publish, we pay you.

2 Q. Mm-hm?

3 A. If you want to publish something we
4 ask you, also we will pay you.

5 Because publishing -- not to publish it
6 means it has damaging information about Qatari
7 officials.

8 Q. Right?

9 A. To them that doesn't -- is not worth
10 a lot of money unless it's coming from Washington
11 Post, New York Times, CNN.

12 Q. Someone, if they were to print, would
13 have some damage?

14 A. Yes.

15 Q. On the Government of Qatar?

16 A. Of those media outlets. But, like,
17 Washington Examiner, they're not interested.

18 Q. Mm-hm?

19 A. New York Post, they are not
20 interested.

21 They have specific lists of names. And
22 they claim that they were advised to follow this
23 strategy by think tanks in the US, which they pay
24 them.

25 Q. Are these think tanks owned by Qatar?

1 A. Yes. They get paid plenty. There is
2 a payment showing on the record so they can justify
3 why they are connecting with Qatar --

4 Q. Mm-hm?

5 A. -- as a think tank.

6 Q. Okay.

7 A. And there are payments that are not
8 disclosed to IRS.

9 Q. And what are those think tanks?

10 A. Casino chips. Cash. Monetary gifts.
11 Packages. Properties.

12 Q. That's how Qatar pays whoever works?

13 A. Yes.

14 Q. Okay. And --

15 A. Casino chips are untraceable, so they
16 give you a casino chip from Monte Carlo; that's
17 worth \$100,000.

18 Q. So they launder money?

19 A. Yes.

20 Q. Using casino chips?

21 A. Yes.

22 Q. Property?

23 A. Yes. Including the company of the
24 gentleman you are suing. This is one of the reasons
25 why they wanted me to participate in framing you.

1 Q. KH Holding?

2 A. Yes.

3 Q. Lauanders money?

4 A. Yes. On behalf of the Qatari
5 government.

6 Q. In the United States?

7 A. In the United States.

8 Q. So it's a money-laundering front?

9 A. That's what they said. They said
10 part of their activity, their activities, is launder
11 money to justify it.

12 Q. They just --

13 A. You can always... They gave me
14 examples. They said: "We invested in schools in
15 the US which we don't care about." But the official
16 or the politician who is on their payroll.

17 Q. Mm-hm?

18 A. Suggested to make that investment in
19 a farm. School.

20 Q. Why would Qatar care about a farm or
21 the United States --

22 A. They don't.

23 Q. -- or the United States --

24 (Query by reporter)

25 Why would Qatar care about the United

1 States school system?

2 A. They don't.

3 Q. Do they care about their own school
4 system?

5 A. No.

6 Q. Do they care about Emirati women who
7 have previously been married to Qatari men, and
8 their children, attending school?

9 A. They don't care about that. One of
10 the cases that they're using as leverage is the case
11 of the Princess Hend al-Qassimi. They actually told
12 me that: "We just going to use it to achieve
13 political goals."

14 Q. Is she viewed as threatening to them
15 because of her use of social media --

16 A. Yes.

17 Q. -- for her cause?

18 A. Yes.

19 Q. Is she causing damage, in their
20 opinion --

21 A. In their --

22 Q. -- as to their reputation?

23 A. Correct, yes.

24 Q. And their position in the world?

25 A. Correct.

1 Q. Does Qatar care about human rights?

2 A. No.

3 Q. They only care about human rights in
4 the sense that it potentially damages their --

5 A. Correct.

6 Q. -- image to other countries --

7 A. Correct.

8 Q. -- in the world?

9 A. They have a secret prison under the
10 Ministry of Education where political prisoners are
11 kept and they haven't seen the sun or daylight in
12 years.

13 Q. Are these Qatari prisoners citizens?

14 A. Some of them -- yes, yes, Qatari
15 citizens. Some of them are members of the ruling
16 family who were opposed to the takeover. And
17 they --

18 Q. Sheikha Moza's takeover?

19 (Query by reporter)

20 Sheikha Moza's takeover?

21 A. Sheikha Moza's or Sheik Hamad,
22 Tamim's father, how he -- because he removed his
23 father.

24 Q. Right?

25 A. A lot of members of the ruling family

1 were against that. So he imprisoned a lot of them
2 to set an example to warn the others. And he also
3 deprived thousands of Qataris of their citizenship
4 to punish them for siding with his father after he
5 removed him.

6 Q. Member of tribes?

7 A. Yes.

8 Q. Which tribes?

9 A. Al Murrah. I believe it was Al
10 Murrah. Yeah.

11 Q. And where are those individuals?

12 A. They were kicked out of Qatar and
13 forced to walk to the Saudi border. Some of them
14 were in hospital beds. They pulled them out of the
15 hospital and told them: "You need to leave because
16 members of your tribe sided with the previous ruler,
17 so we decided to punish the entire tribe. So,
18 walk."

19 Q. Were they stripped of their
20 citizenship?

21 A. Yes, and their rights to healthcare,
22 education.

23 Q. Were they afforded due process in the
24 stripping of that --

25 A. No.

1 Q. -- citizenship?

2 A. No. No. No. It was a decision made
3 in one hour.

4 Q. And they were forced out?

5 A. That's it.

6 Q. And they were hosted by neighbouring
7 countries?

8 A. Saudi Arabia.

9 Q. Took in those people who had no home?

10 A. Correct.

11 Q. And no citizenship?

12 A. Correct.

13 Q. So you mentioned KH Holding is known
14 by the Government of Qatar, based upon your
15 discussion, to be a money laundering firm?

16 A. I didn't hear of the name until they
17 brought it up, as Khalid owns it or "runs" it, they
18 call it.

19 Q. Mm-hm?

20 A. And "we don't want that dirt to come
21 out because we use companies in the US to launder
22 money."

23 When you want to hire a politician and you
24 say: We have a company in the US who needs your
25 advisory services, it's justifiable payment. He

1 would make a phone call that lasts seven minutes and
2 they --

3 Q. "He" being who?

4 A. The politician or specific official
5 they want to recruit.

6 Q. Okay.

7 A. And they tell him: "Just be on the
8 phone with us, just to show on the record that you
9 spoke to us to give us advice, and \$500,000 will be
10 transferred to you."

11 Q. And it is?

12 A. And it is. Some officials get
13 recruited for \$50,000. Others needs \$12 million.

14 Q. 12 million. Is that a journalist
15 or --

16 A. No.

17 Q. -- a person in --

18 A. A journalist will never get more than
19 \$1 million, but politicians, yes.

20 Q. Is that Qatar's cap? That's what
21 they've paid to date, is up to 1 million to
22 journalists?

23 A. To journalists, yes. But to the
24 person who owns the media outlet, they pay way more.
25 And they can invest in it, through companies that

1 exist in the United States. Hence...

2 Q. So shell companies. Okay. And is
3 that what Brookfield did?

4 A. I was told that Brookfield was one of
5 the companies that Qatar used to pay Jared Kushner
6 1.4 billion.

7 Q. 1.4 billion for what?

8 A. To pay off his debts and his real
9 estate in the US.

10 Q. For 666 Fifth Avenue in New York?

11 A. Correct. And according to them, they
12 had to do it.

13 Q. They had to do it? Qatar had to pay
14 Brookfield that amount of money?

15 A. Not Brookfield. Pay Kushner through
16 Brookfield.

17 Q. And why did they have to -- why
18 couldn't they pay Kushner directly?

19 A. Too risky.

20 Q. For what?

21 A. Media, government notifications.
22 Everybody would notice that Qatar paid him directly
23 but --

24 Q. Violations of United States law?

25 A. Yes. Which they don't think it

1 exists. They said that once the Democrats -- they
2 said: "We recruited both, Republicans and Democrats
3 but that's not good enough. We want to rule the
4 White House." So they will.

5 Q. The Government of Qatar would like to
6 rule the White House?

7 A. Yes, through their own recruits.

8 Q. Through Congress?

9 A. Yes.

10 Q. Through the Senate? Through paying
11 people off?

12 A. Yes.

13 (Query by reporter)

14 Q. Through the Senate?

15 A. Yes.

16 Q. Through American officials?

17 A. Yes.

18 Q. And was Qatar well aware of the deal
19 that this money was going to go to Kushner before
20 they paid Brookfield?

21 A. Qatar is the largest or one of the
22 largest investors in Brookfield, in billions of
23 dollars.

24 Q. Mm-hm?

25 A. They keep that as backup in case they

1 needed to use it without stirring waves.

2 Q. Mm-hm?

3 A. One of the ways that it became so
4 handy is the fact that when Kushner demanded that
5 money --

6 Q. Jared Kushner demanded that amount?

7 A. Jared Kushner.

8 Q. Did he approach the Qataris or did
9 they approach him?

10 A. No. They claim that he approached
11 them.

12 Q. Jared Kushner approached the
13 Government of Qatar for a bailout of 666 Fifth
14 Avenue?

15 A. Correct. That's what they told me.
16 They said that they didn't want to pay him because
17 he -- apparently either Jared Kushner or his father
18 approached the Qataris before they won the White
19 House.

20 Q. Well, his father's in prison so it
21 was probably --

22 A. His was --

23 Q. His father's a felon. It was
24 probably Jared himself, though you do have an email
25 system called Corrslink (sic) in federal prison that

1 allows you to correspond with people outside the
2 Bureau of Prisons?

3 A. So, according to them, they were
4 approached about this specific property.

5 Q. This property?

6 A. Yes, years before they -- he said,
7 before they took over the White House.

8 Q. Okay?

9 A. The Kushner family.

10 Q. Okay. And is this property known
11 for -- I mean, \$1.4 billion is quite a lot of money.
12 Is this property bailout, I'll call it, or purchase,
13 known as a weakness to the Kushner family? Was this
14 property --

15 A. Correct.

16 Q. -- failing, if you know?

17 A. Miserably.

18 Q. Okay?

19 A. And I said to them: "You got
20 Brookfield in trouble by forcing them to pay 1.4
21 billion, because Brookfield is also a Canadian
22 company."

23 Q. Mm-hm?

24 A. They said: Well, that's why we need
25 you to keep the media out of this," because nobody

1 in Brookfield -- the "higher command" as they call
2 them...

3 Q. Mm-hm?

4 A. -- wanted to do it.

5 Q. You're talking about the executives
6 of Brookfield?

7 A. Yes. They didn't want to do it.

8 Q. Did not. So they had awareness of
9 what this --

10 A. Yes.

11 Q. This --

12 A. But it was Qatar's money. So Qatar
13 promised them: Every dollar you lose in this deal
14 we'll compensate you from our own investment.

15 Q. The Government of Qatar assured the
16 company of Brookfield that they would ensure the
17 purchase of 666 Fifth Avenue for \$1.4 billion if it
18 failed?

19 A. Correct. Because Brookfield wasn't
20 convinced that this is a good investment, and
21 they -- apparently the Qataris were told that this
22 is bad. But the Qataris didn't want to explain to
23 Brookfield the actual political reason for this
24 payment.

25 Q. Mm-hm?

1 A. And they just told them: "Find a
2 way --"

3 Q. They, the Government of Qatar, told
4 Brookfield?

5 A. "Find a way to pay Jared Kushner
6 without going by the book." Because if they go by
7 the book --

8 Q. You can't.

9 A. You can't.

10 Q. There's no "by the book" for this
11 scenario.

12 A. No, and the Qataris guaran---

13 Q. It's illegal?

14 A. Yeah. Guaranteed it. And apparently
15 an executive from Brookfield was refusing to accept
16 that, this deal. And they said: "We just had a
17 scandal here and this is going to be another scandal
18 because this is people's money." And they said,
19 "Well, don't touch people's money, touch our money.
20 Just do it."

21 And they did it. And Kushner is happy
22 with them because, according to them, I don't know
23 Kushner personally, but the Qataris said Kushner
24 told them: "Choose one of two. You pay what I tell
25 you to pay, or I unleash my dogs."

1 Q. And the dogs being who?

2 A. Saudi Arabia and the UAE.

3 Q. Those are big dogs? Powerful dogs?

4 A. Yes.

5 Q. So Qatar was well aware of how this
6 was all going to be handled by Brookfield?

7 A. Yes. And I asked them, I said: "Did
8 you know --"

9 (Query by reporter)

10 Q. By Brookfield?

11 A. Yes.

12 Q. And who was going to be paid, which
13 was Jared Kushner or his family?

14 A. Yes.

15 Q. Who owns, or owned, 666 Fifth Avenue?

16 A. Yes, and they told me that they won't
17 see a penny of that money because it's a lost cause.
18 Said: "This is the worst investment in history.

19 And we know we're not getting anything. We just
20 paid it to pay off his debt. And as long as he's in
21 the White House, we have to do what he wants until
22 we control the White House." "We" as in Qatar.

23 Q. Okay. Then what did the Qatari
24 Foreign Minister tell you about this deal?

25 A. The Foreign Minister didn't speak to

1 me but Intelligence, and Al-Masnad, Al-Athbah, they
2 said: "It's the worst. We threw \$1.4 billion down
3 the toilet. It's not coming back. It's not a good
4 investment, it's the worst investment. It's a lost
5 cause."

6 Q. Mm-hm?

7 A. "But we have to do it." He said:
8 "It's going to take us about three weeks to make it
9 back from oil and gas, but as an investment it's the
10 worst."

11 Q. So an investment from a financial
12 standpoint?

13 A. The worst.

14 Q. Ridiculous. Terrible. From a
15 political investment standpoint?

16 A. The best.

17 Q. Wonderful?

18 A. Yes.

19 Q. Okay. And what was your involvement
20 with this?

21 A. I did not have -- because it already
22 took place before I went to Doha. It happened. But
23 I knew the details of it, and they were asking me
24 not to allow the media to have access to what I
25 know.

1 Q. So the media control was your
2 involvement with this deal?

3 A. Well, yes. They asked me: "If you
4 get a call from a specific individual or a
5 reporter --"

6 Q. Mm-hm?

7 A. "-- asking about this, just tell them
8 'I have no knowledge of any illegal procedure in
9 this deal,' and just let it fly.

10 Q. And did you get calls about this?

11 A. I got calls, yes.

12 Q. What did you say?

13 A. I said: "No comment."

14 Q. Were there lobbyists involved in this
15 deal?

16 A. Yes.

17 Q. Who?

18 A. I have no idea. They said that their
19 guys -- the lobbyists, they refer to them as their
20 "guys."

21 Q. Okay?

22 A. In America.

23 Q. Okay?

24 A. And he said: "The guys suggested
25 that this is the best way to do it. And don't send

1 money directly because you're not sending \$14. This
2 is 1.4 billion. Someone in the U.S. Government is
3 going to be --"

4 Q. You can't even send 14 cents without
5 reporting it?

6 A. Exactly. So somebody is going to
7 know and is going to ask questions. "And even
8 though you control most of American media, someone
9 is going to raise a red flag. So let's not do
10 that."

11 Q. So there are media outlets that Qatar
12 feels they can't control?

13 A. Yes.

14 Q. That could print something and have
15 impact --

16 A. Yes.

17 Q. -- that would have detrimental impact
18 on the Government of Qatar?

19 A. Correct. Correct. But he also said:
20 "Give us another year and we will own the field in
21 the US."

22 Q. "Own the field"?

23 A. As in the media. We will own them
24 all.

25 Q. And what date was that stated?

1 A. During my meeting.

2 Q. In June of 2018?

3 A. Yes. In Doha.

4 Q. So we're a year from that. We're a
5 year and a half from that.

6 A. Yeah.

7 Q. It's 2019.

8 A. It was just four months ago.

9 Q. So June 2019?

10 A. Yeah. During my visit. He said:
11 "Give us a year and we will own it all." This was
12 four months ago, so we're counting.

13 Q. We're almost halfway.

14 A. Yeah.

15 Q. All right. Should we take a break?

16 (Affirmative by reporter)

17 MS. CASTENEDA: Yes, that would be good,
18 to stop for now.

19 (Discussion off the record)

20 THE VIDEOGRAPHER: This marks the end of
21 Media Number 1 in the deposition of Alan
22 Bender. Going off the record at
23 10:47 a.m.

24 --- Upon recessing at 10:47 a.m.

25 --- Upon resuming at 11:10 a.m.

1 THE VIDEOGRAPHER: Here begins Media
2 Number 2 in the deposition of Alan Bender.
3 We're back on the record at 11:11 a.m.

4 BY MS. CASTANEDA:

5 Q. Okay. Mr. Bender, I'll just remind
6 you that you remain under oath to tell the truth.

7 A. Yes.

8 Q. Okay. I would like to go back to
9 talking about Ilhan Omar.

10 A. Yes.

11 Q. So we talked -- I asked you a couple
12 of questions. I have some more about her.

13 A. Yes.

14 Q. Are you aware of any plans by the
15 Qatari government and the intelligence agency to use
16 their official and/or affiliated media outlets to
17 discredit, defame, character-assassinate, and
18 tarnish the reputations of any critics of Ilhan
19 Omar?

20 A. Yes.

21 Q. And what are those?

22 A. They asked me and proposed to me many
23 different ways to tarnish the reputation of specific
24 individuals, and the number 1 is Iman Tawhidi.

25 Q. Okay?

1 A. Because to them he's an Australian,
2 he's not an American.

3 Q. Mm-hm?

4 A. And if they "slaughter" him as they
5 described it, they will be able to send a message to
6 anybody who is considering, even just considering,
7 criticizing Ilhan Omar for any reason: "We will do
8 to you what we did to Tawhidi." And that's exactly
9 what they wanted me to do.

10 Q. And why are they going after him? Is
11 he loud? He gets the most attention? His
12 information is truthful? All of these?

13 A. All of these. And the fact that he
14 has a verified account plays a big role.

15 Q. Verified account on Twitter?

16 A. Twitter. On Twitter. Correct. And
17 the fact that he apparently, according to the
18 Qataris, he is also respected among a lot of people
19 in the political circles in the US.

20 Q. Okay?

21 A. He has direct friendships with well
22 known politicians in the U.S. And he could
23 influence hundreds of thousands of people with what
24 he publishes.

25 And that's why, they said: "There are

1 some individuals we don't care about, but this guy
2 is affecting us. And he is affecting Ilhan Omar.
3 And Ilhan Omar is, although she pretends that she's
4 not even reading his tweets --"

5 Q. Mm-hm?

6 A. "-- she's actually complaining about
7 how hurtful they are. Hurtful in the sense that he
8 exposes facts and they don't want those facts to be
9 discussed as subjects.

10 Q. Can you give an example of a fact
11 that he exposed?

12 A. He's repeatedly mentioned the fact
13 that Qatar works -- Ilhan Omar works for Qatar.

14 Q. Okay.

15 A. And he backed it up with examples of
16 activities. He also several times referred with
17 strong argument to the fact that Ilhan Omar is not
18 acting as a true Muslim that she claims to be.

19 Q. Mm-hm?

20 A. And that she picks and chooses the
21 topics that she wants to present to the American
22 public based on the interest of Qatar. And that's
23 embarrassing her. So they want -- she asked,
24 according to them, she asked them to "silence" him.

25 Q. Does that mean kill?

1 A. The physical punishment, as they call
2 it, has not been raised, although jokingly Abdullah
3 Al-Athbah said: "We wish if he was not living in
4 the US or western country so we can get one of the
5 fanatics to say killing him will be the path of
6 God."

7 Q. And have someone else do it on their
8 behalf?

9 A. Yes. That's what he referred to as
10 doing that. But given the fact that Tawhidi lives
11 and travels to western capitals, they don't do that.

12 Q. Okay. And why doesn't Ilhan Omar
13 herself speak out against him?

14 A. She's too afraid to stir even more
15 trouble; if she denies it and then somebody
16 somewhere will have evidence to present, she will
17 look like a liar under oath on the record. So she
18 was advised by the Qataris, just ignore him.

19 Q. Ignore him and the Qataris will
20 handle it?

21 A. Yes. They will take care of it.

22 Q. Although apparently they're not
23 handling that because he's --

24 A. Yes, well, they --

25 Q. -- still a concern to them?

1 A. Yes, and they still try -- even for
2 the last article by the Washington Post was another
3 attempt to discredit his reputation, and they
4 falsified what he stated to them, and the Qataris
5 bragged about it.

6 Privately, he answered questions that they
7 did not actually publish. And they chose specific
8 words, and they reworded them, and they published
9 them.

10 Q. "They" being the journalists for the
11 Washington Post?

12 A. For the Washington Post, yes.

13 Q. And is that journalist on the payroll
14 for Qatar?

15 A. I'm not sure if this journalist --
16 like, the name of the journalist, was not mentioned
17 directly.

18 Q. Okay.

19 A. But the Qataris always say to me:
20 "We will send the Washington Post or the New York
21 Times to do so." So whomever is running the show
22 there --

23 Q. Mm-hm?

24 A. -- is definitely aware of what
25 Qatar's involvement is.

1 Q. And you mentioned that Qatar bragged
2 about the article that was recently published in the
3 Washington Post?

4 A. One of the -- yes. Correct.

5 (Query by reporter)

6 Q. One of the recent articles in the
7 Washington Post?

8 A. Yes.

9 Q. What did they say?

10 A. "He fell for it."

11 Q. "He" being?

12 A. Tawhidi.

13 Q. Okay.

14 A. He was approached under the pretenses
15 that they want to write about his influence in
16 social media.

17 Q. Mm-hm?

18 A. Turned out it was a trap. They just
19 wanted to attack Rudy Giuliani...

20 Q. Mm-hm?

21 A. Princess Hend al-Qassimi...

22 Q. Mm-hm?

23 A. And Tawhidi, and make them look like
24 they are saying things that are not true; and that
25 Tawhidi, although he's talking about Ilhan Omar's

1 illegal activities or immoral behaviour --

2 Q. Mm-hm?

3 A. He hasn't been able to present
4 evidence. Which is not actual reason why they
5 contacted him, because they contacted him under the
6 pretenses that: "We would like to write a report
7 about you." Yet they wanted to know more about
8 American officials in contact with him, and they
9 asked him specifically: "Can you give us the names
10 of the officials who are co-operating with you,"
11 or...

12 Q. So it was a fishing intelligence
13 expedition?

14 A. Yes. That was it. And hence why the
15 report was published in a very negative way about
16 the parties involved, including Rudy Giuliani.
17 Because they asked Princess Hend about him and she
18 complained to them that they should be focussed on
19 her humanitarian crisis.

20 Q. Mm-hm?

21 A. Not whether or not she spoke to
22 American officials. But she also fell for it. And
23 she provided them with copies of his text messages,
24 which they promised her they're not going to
25 publish. Yet the first thing they did is publish

1 them. And they refer to him as a man who used the
2 humanitarian cause to make money.

3 (Query by reporter)

4 To make money with the Government of
5 Qatar.

6 Q. And you're referring to Rudy
7 Giuliani?

8 A. To Rudy Giuliani.

9 Q. And does Rudy Giuliani work with the
10 Government of Qatar?

11 A. I don't know if he works with them or
12 for them, but he was their consultant, he was a
13 lobbyist for them, and he also, according to the
14 Qataris, had made a trip to Doha to facilitate a few
15 millions of dollars deal, contract, with a cyber --
16 a cyber security company in the US.

17 Q. Okay.

18 A. Who is owned by, I don't know, a
19 friend of Rudy Giuliani.

20 The Qataris gave me the impression that
21 they recorded this conversation and they granted
22 him, I think it was, 8 or 10 or 12 million dollars.
23 And Rudy Giuliani was actually promoting Qataris'
24 interest in the US up until he was appointed
25 President's first lawyer.

1 Q. Okay. So this is prior to his
2 appointment with the Trump administration?

3 A. Correct.

4 Q. Okay. Do you know who else the
5 Government of Qatar is targeting through media
6 influence?

7 A. They target -- they want to target
8 and they are targeting anybody who will criticize
9 specific individuals in the US and public image --
10 public individuals, be it politicians or activists,
11 who are on Qatari's payroll.

12 Q. Mm-hm?

13 A. Including Linda Sarsour.

14 (Query by reporter)

15 Including Linda Sarsour, the activist.

16 And according to the Qataris, they told me that she
17 is next in line. She will be appointed Senator.

18 Q. She has been selected by the
19 Government of Qatar to infiltrate the United States
20 Government on behalf of the Government of Qatar?

21 A. As a Senator. Yes.

22 Q. Okay. And they are going to fund her
23 and support her in the same way that they did Ilhan
24 Omar?

25 A. Correct. They call it "appointing"

1 her.

2 Q. Appointing. And is she the next
3 "jewel in the Crown"?

4 A. Yes.

5 Q. Okay. And is Linda aware of that?

6 A. According to them, she is fully
7 aware.

8 Q. And she's a willing participant
9 and --

10 A. Yes. And when they call her Sister
11 Linda, then she's Muslim Brotherhood cover, which is
12 funded completely by Qatar.

13 Q. And what are her weaknesses that they
14 are going to use for leverage?

15 A. They did not want to discuss that but
16 they said: "It's already covered and done."

17 Q. So she obviously has some if
18 they're --

19 A. Absolutely.

20 Q. -- selecting her?

21 A. Correct.

22 Q. So there's no reason to believe her
23 selection by the Government of Qatar is any
24 different than how they had previously picked Ilhan
25 Omar?

1 A. Correct.

2 Q. Okay. Are you aware of any other
3 influence by the Government of Qatar in the
4 intelligence community here in the United -- well,
5 in the United States? We're in Canada right now.

6 A. In the United States, according to
7 them, that there is a form of co-operation and they
8 exchange information.

9 Q. Mm-hm?

10 A. And sometimes information passed on
11 to Qatar to be checked.

12 Q. Mm-hm?

13 A. If it's accurate or not, the Qataris
14 will pass it to the Iranian intelligence. Just like
15 they pass intelligence they gathered through Ilhan
16 Omar. She's sitting on the more sensitive
17 committee.

18 Q. Do you know which one that is?

19 A. No. They said a "sensitive"
20 committee.

21 Q. So she sits on a committee where
22 where she has access to classified information?

23 A. And she passes it on to the Qataris.
24 The Qataris will share it with Iran and Hezbollah.

25 Q. And what is Hezbollah?

1 A. Hezbollah is an organization that is
2 fighting in Lebanon against Israel and against the
3 US. And they are listed as terrorist organization
4 by the US government.

5 (Query by reporter)

6 Against Israel. And they are responsible
7 for the attacks on the Marines' barracks back in the
8 eighties. And they are listed as a terrorist
9 organization by the Government of the United States.
10 But Qatar made a deal with them for \$800-plus
11 million cash.

12 Q. And was that deal partially
13 effectuated through the fake kidnapping of the
14 Qatari Royal Family that was hunting by the border
15 with Iraq?

16 A. Correct.

17 Q. And do you know about their payout
18 and how they didn't want to pay directly a terrorist
19 organization?

20 A. Correct. The Qataris admitted to me
21 that they made two big mistakes. One mistake is in
22 the Syrian battlefield against Hezbollah and Iran.
23 The second mistake is being part of the Yemen war.

24 And when they were under siege, they were
25 kicked out of the war in Yemen. They didn't

1 withdraw, they were forced by the Saudi government
2 to leave.

3 Q. Mm-hm?

4 A. So, according to the Qatari
5 officials, they were asked to compensate and
6 apologize financially. So Hezbollah suggested,
7 according to the Qataris, to orchestrate this
8 kidnapping thing.

9 Q. The hunting party?

10 A. The hunting party, their visas, their
11 information, their locations, were actually provided
12 by the Government of Qatar --

13 Q. Mm-hm?

14 A. -- to the -- to Hezbollah, to conduct
15 a fake kidnapping.

16 Q. And were the people that were
17 kidnapped aware of this plan?

18 A. No. They were not aware. And they
19 wanted it to be complete -- they wanted them to be
20 oblivious to what's happening, otherwise it's going
21 to be a big problem within the Royal Family of
22 Qatar, because they are using them as scapegoats.

23 Q. Right? As pawns, really?

24 A. Exactly, pawns.

25 Q. Yeah?

1 A. And they made a deal. The Qataris
2 were convinced that it is striking several birds
3 with one stone.

4 First, to the Royal Family members, they
5 will look like the people were saved by Tamim and he
6 paid hundreds of millions of dollars to save them.

7 Q. 300 million?

8 A. So they will never turn against him.

9 (Query by reporter)

10 Q. And I said "300 million," publicly
11 known?

12 A. \$850 million.

13 Q. It was far more?

14 A. \$850 million in cash, transported by
15 private jets from Doha to Iraq on a daily basis.
16 Whatever the plane can carry. That's \$850 million
17 in cash.

18 Q. Mm-hm?

19 A. Which is, basically covers one and a
20 half years' supply of Hezbollah' needs.

21 With the Iranians, they made a similar
22 deal but they didn't have to stage a kidnapping.
23 They just sent airplanes with cash, and they paid.

24 The Iranians are the only space left for
25 the Qataris to breathe through. So the Iranians

1 wanted the Qataris to apologize financially for
2 their battlefield involvement in Syria against the
3 Iranian troops for the past five years.

4 Hence, why Qatar is paying now whatever
5 Iran is asking them in addition to the intelligence
6 gathering. The Iranians know that Qatar controls
7 Ilhan Omar and they want access to American
8 intelligence or military secrets.

9 Q. So Iran asked, through the Government
10 of Qatar, what the United States is up to?

11 A. Correct.

12 Q. And specific intelligence?

13 A. Yes.

14 Q. And Ilhan Omar provides that to the
15 Government of Qatar?

16 A. And leaves it up to them to share it
17 with whomever they see fit.

18 Q. Does, to your knowledge, Ilhan Omar
19 know that the information she's sharing with Qatar
20 hurts the United States Government?

21 A. I think they know that she knows the
22 fact that she is just sharing information with a
23 foreign country is hurtful to the United States'
24 interest.

25 Q. So the act of handing any information

1 in any form --

2 A. Correct.

3 Q. -- is harmful?

4 A. Correct. And she is aware of that.
5 And they are aware that she is aware of that. So,
6 as far as she's concerned, nobody's coming after
7 her.

8 Q. And did she -- you mention that she
9 pledged allegiance to the Muslim Brotherhood before
10 she even ran for office?

11 A. She pledged allegiance to Erdogan.

12 Q. Mm-hm?

13 A. According to the Qataris. In their
14 conversations with me, they repeat and refer to
15 their "Sister Ilhan."

16 Q. Mm-hm?

17 A. That she is loyal. And Erdogan also
18 has the loyalty of the Somali people. Somalia is
19 known to be a Turkish-controlled influence.

20 Q. Mm-hm?

21 A. And she's from there. Her family's
22 there. Her scandals of her family and hers, and her
23 history, is in Somalia. Hence why Qatar appointed.
24 The new director of intelligence in Somalia is a
25 Somali guy who worked at Al Jazeera.

1 Q. Mm-hm. Do you know his name?

2 A. I forgot his name. It was discussed.
3 He's all over the news. He's a reporter who was
4 appointed head of intelligence, which means any
5 secrets about Ilhan Omar or her family will not
6 leave Somalia without Qatar's consent.

7 Q. And was that intentional on behalf of
8 Qatar to appoint him?

9 A. Correct. Yes.

10 Q. And is that in support of Ilhan
11 Omar's reach for whatever she --

12 A. Correct.

13 Q. -- may do next?

14 A. Correct.

15 (Query by reporter)

16 Q. "Ilhan Omar's reach for whatever she
17 may do next?"

18 Does Ilhan Omar try to conceal any of her
19 dealings with the Government of Qatar?

20 A. According to the Qataris, yes. It's
21 not in her best interest to show any direct
22 co-operation with the Government of Qatar. But they
23 also admitted that some American officials are fully
24 aware of her co-operation with Qatar.

25 Q. And you mention that that was -- some

1 of those were part of her political party?

2 A. Correct, according to what they told
3 me.

4 Q. Is there any indication that the
5 United States Government has sanctioned her
6 activities and her involvement with the Government
7 of Qatar? And when I say "sanction," I mean
8 blessed? Agreed upon?

9 A. Oh. Officially, no. Off the record,
10 they turned the other... They turned a blind eye.
11 They don't dig too deep into it. Because Qatar's
12 money is spreading fast and big.

13 Q. Mm-hm?

14 A. In the American body. So to them,
15 when an American official who is not taking money
16 from Qatar finds out that Ilhan is taking money, or
17 others, he will contact Qatar and say: "What about
18 me?"

19 Q. And add to the payroll?

20 A. And add to the payroll.

21 Q. Are there any Americans that have --
22 that are in office that have spoken out against
23 Qatar, knowing what they know about Ilhan Omar?

24 A. According to the conversations with
25 the Qataris, yes.

1 Q. And what happened to those people?

2 A. Nothing. They sometimes approach
3 them and they give them what they want; or sometimes
4 those officials who know about Qatar's co-operation
5 with Qatar -- Ilhan and Qatar's co-operation, they
6 actually bring it up to make themselves look innocent
7 if --

8 Q. To deflect anything that comes their
9 way?

10 A. Correct.

11 Q. How does Qatar pay Ilhan Omar?

12 A. Several methods. Cash, but always
13 through a third party, and her family in Somalia.

14 Q. Mm-hm?

15 A. And contracts with relatives. Qatar
16 turned the soccer World Cup projects into a cash
17 cow, to justify paying politicians through their
18 relatives. They tell them: "Open any fake
19 company."

20 Q. Mm-hm?

21 A. "Pretend you're into the business of
22 transporting goods, and we will give you \$10 million
23 for a contract that's worth --"

24 Q. A dollar?

25 A. Yes. "And then you will find a way

1 to send so-and-so's share to them, or just keep it
2 with you for them, safekeeping."

3 Q. So through family members is how
4 Qatar launders money?

5 A. As one of the methods, yeah.

6 Q. With Ilhan Omar?

7 A. They said that, yes.

8 Q. Okay. What about property?

9 A. They have arranged for properties in
10 specific capitals outside the US.

11 Q. Mm-hm?

12 A. As future investments, which are
13 going to translate into a gift of ownership switch.

14 Q. Okay?

15 A. And then you can sell it. And you
16 sold a legitimate property.

17 Q. Mm-hm?

18 A. There is no law against that. But if
19 you traced source --

20 Q. Right?

21 A. -- you will see that Qatar was the
22 initial purchaser.

23 Q. Do you know which country they route
24 their money through to launder?

25 A. They prefer the UK, sometimes France.

1 And of course European countries, they are poor and
2 need. They launder through that because no
3 government official will object to money --

4 Q. Because they pay them off?

5 A. And they pay them off.

6 Q. What about Panama?

7 A. I think Panama, Panama was an option
8 or an area that they decided to stay away from for a
9 while because of the leaks.

10 Q. Mm-hm?

11 A. That happened. Whenever there's a
12 leak that full of scandal, they take a pause.

13 Q. Mm-hm?

14 A. But they go back.

15 Q. So they're pausing with Panama right
16 now?

17 A. Pausing. Yes.

18 Q. What about Cyprus?

19 A. They have investments in Cyprus but
20 they didn't discuss Cyprus as a hub towards US
21 officials. I think they use different countries. I
22 think Cyprus, Malta --

23 Q. Mm-hm?

24 A. -- are directed towards more European
25 officials.

1 Q. Okay. Has the Government of Qatar
2 specifically asked Ilhan Omar to state on the record
3 during government proceedings in the United States
4 anything specific?

5 A. Yes, they told me they would ask her
6 to ask specific questions, especially if she's
7 presiding on a committee.

8 Q. Mm-hm?

9 A. Oversight committee or an
10 investigation, they would ask her to ask questions.

11 Q. And do you know if she did that?

12 A. According to them, she did. She
13 never said no. She doesn't say no.

14 Q. And she provides the answers to them?

15 A. Of course.

16 Q. What about in legal proceedings?

17 A. As in?

18 Q. If an ISIS member was being
19 sentenced, do you know if she provided information
20 to a federal judge for them to consider compassion
21 upon this person?

22 A. The Qataris say she will do anything
23 they ask her to do, especial when it comes to one of
24 the brothers or the sisters. Which means any
25 extremist, any religious member of the organization,

1 that are fanatics that are important to Qatar.

2 Q. Mm-hm?

3 A. And it happens in the US, she will
4 provide any service Qatar wants. According to the
5 Qataris, she had never said no, ever, to them.

6 Q. Have the Qataris ever missed a
7 payment to her friends or family?

8 A. No. They always pay.

9 Q. How do they pay her family in terms
10 of -- so you said money laundering through real
11 estate held abroad. What about actual cash?

12 A. Inside the US, through a third party.

13 Q. So there's actual cash. Make a money
14 wire?

15 A. No.

16 Q. Hard cash, like in holding in my
17 hand?

18 A. Money -- money bag, yes.

19 Q. Okay?

20 A. And that will be very easy, he said.
21 According to them, you can walk into a casino, give
22 them a hundred thousand dollars worth of chips, they
23 give you cash, and nobody will ask you any question.
24 You just drive straight to whatever you want and you
25 give them the money.

1 Q. So they present to a casino with
2 chips, already purchased somehow, to cash out and
3 then provide that cash to whoever they feel like?

4 A. Yes.

5 Q. Okay. How does Qatar communicate
6 with Ilhan Omar?

7 A. Through a third party, paid or
8 pre-paid phones.

9 Q. Okay?

10 A. And personal messengers. Sometimes
11 they would actually -- a person will get on a plane.

12 Q. Face to face?

13 A. And fly, take a message, come back.
14 It could be a friend of Ilhan Omar, could be working
15 for her, could be an aide, an assistant.

16 Q. Mm-hm?

17 A. Could be a journalist on Qatar's
18 payroll and pretend that he needs to meet and ask
19 questions.

20 Q. Mm-hm?

21 A. Information will be passed.

22 Q. Okay. Can you confirm if the Council
23 on American and Islamic Relations is funded by the
24 Government of Qatar?

25 A. According to what they said, anything

1 that is related directly or indirectly to Islamic
2 foundations or Muslim Brotherhood, Qatar is in
3 control.

4 Q. Control?

5 A. In control.

6 Q. Not just involved but in control?

7 A. They don't accept involvement.

8 Q. They don't accept involvement?

9 A. No. They want control.

10 Q. Complete?

11 A. You want our money, we control it.

12 We give you as much money as you want, but you give
13 us everything we want.

14 Q. Did that ideology contribute to the
15 division in the Gulf with other countries?

16 A. No.

17 Q. Them wanting to be in control?

18 A. Correct.

19 Q. Of extremist views and money?

20 A. Their winning cards are extremists.

21 Qatar views them as assets, and the best assets,
22 because you can control 10,000 fighters on the
23 battlefield in Syria through one fanatic who's
24 their --

25 Q. Leader?

1 A. Imam.

2 Q. Mm-hm?

3 A. Qatar only recruits that guy. Those
4 guys get \$300, \$400 dollars a month. He gets \$100-
5 to \$200,000 a month. They tell him to tell them
6 that God spoke to him and said, do this and don't do
7 that. And it's done.

8 Q. And does "God" translate to?

9 A. Al-Masnad.

10 Q. Okay. All right. I'd like to talk
11 about Linda Sarsour.

12 Are she and Ilhan Omar, to the best of
13 your knowledge, friends, or do they know each other?

14 A. Very well, according to the Qataris.
15 I asked the same question and I asked them: "What
16 is the relationship?" They said they're very close.
17 They're allies, and they are friends for a long
18 time, and Sister Ilhan listens to Sister Linda.

19 Q. Did Ilhan recruit Linda or was she
20 recruited independently?

21 A. I think Linda was part of the
22 recruitment of Ilhan.

23 Q. So the other way around?

24 A. Yes. And now Linda wants the favour
25 back by getting the support in political -- American

1 political politics.

2 Q. There was a recent tweet by Ilhan
3 Omar stating that Linda Sarsour was going to back or
4 support Bernie Sanders?

5 A. Correct.

6 Q. Did you see that tweet.

7 A. Yes.

8 Q. And then she stated: "I need to see
9 if this fits with my constituents' plan for them
10 voting for me and standing in office."

11 Does she not focally support Bernie
12 Sanders, which would vocally support Ilhan Omar
13 because Qatar did not pay her?

14 A. Linda? Are we talking about Linda
15 Sarsour?

16 Q. Linda, mm-hm?

17 A. She is supporting Bernie Sanders.

18 Q. Right. But she'd stated that she was
19 not going to publicly support anybody without
20 consultation of her constituents. So she didn't one
21 thousand percent support Ilhan Omar statement. Is
22 there a reason behind that?

23 A. Yes. They control them, and they --
24 sorry. Yes, they control them and they also turn
25 them against each other if need be. They don't

1 want --

2 Q. Ilhan against Linda?

3 A. Yes. And others. The Qataris
4 play -- they said: "The only thing we inherited
5 from the Brits that is useful is their policy of
6 divide and rule. As long as they keep everybody
7 divided.

8 Q. Mm-hm?

9 A. By each other, they control all
10 parties.

11 Q. So they work independently of each
12 other and then, when requested, jointly?

13 A. They join. Yes.

14 Q. Okay. So you mentioned in your
15 meeting that -- in Doha that the case of which I
16 represent the plaintiffs, why we're here today, was
17 also discussed?

18 A. That was the first time it was
19 brought to my attention.

20 Q. Have you seen a copy of the complaint
21 for this case?

22 A. No.

23 Q. Okay.

24 A. Oh. This is what was published in
25 the media, I think.

1 Q. Well, that's the Complaint. It's,
2 yes, it's public information.

3 A. Yeah.

4 Q. And it was published by -- it was
5 sent to the ambassador in D.C.

6 A. Yes.

7 Q. And it's public. So it was pulled
8 by, I'm sure, journalists and --

9 A. Yes.

10 Q. -- and anybody with any interest.

11 THE REPORTER: Journalist?

12 A. Plural.

13 Q. Anybody who --

14 A. In the media.

15 Q. -- cares to understand or know about
16 legal proceedings in the United States.

17 A. Yes, I believe this was actually
18 printed in Arabic too, in the media.

19 Q. I think it was.

20 A. Yeah.

21 Q. I'm going to go through a couple of
22 paragraphs with you.

23 A. Yeah.

24 Q. So our case was discussed. Let's go,
25 can you look at paragraph 28. I should probably

1 mark this as an exhibit, I suppose. I think this is
2 4?

3 THE REPORTER: That's right.

4 EXHIBIT 4 marked for identification: Complaint and
5 Demand for Jury Trial

6 THE WITNESS: What page?

7 BY MS. CASTANEDA:

8 Q. Paragraph 28, please.

9 A. Okay.

10 Q. So this --

11 A. "During the period"?

12 Q. Mm-hm. That's right. So:

13 "During the period of his
14 employment with Defendants, Pittard
15 worked approximately 80 hours per
16 week when Defendant was located in
17 the United States. When Defendant
18 was in Qatar and travelling,
19 Pittard's work hours varied from 60
20 to 70 hours per week, he was not
21 permitted any time off and was on
22 call 24/7 to immediately respond to
23 Defendant's needs and requests."

24 And the defendants in this case that I'm
25 mentioning are Sheik Khalid bin Hamad bin Khalifa Al

1 Thani, Geo Strategic Defense Solutions, and KH
2 Holding.

3 During the meeting that you had, was
4 Matthew Pittard and his employment with Sheik Khalid
5 discussed?

6 A. Not the details of the employment,
7 but I asked questions.

8 Q. Okay.

9 A. When your name came up and the case.
10 And I said: "So is everything they're saying or
11 claiming in this case, which I haven't read yet,
12 true?" They said: "Yes. Everything is true. But
13 we don't want it to turn into a legal case. And we
14 need this to go away."

15 Q. So at that point in time when you
16 met, which was in June?

17 A. Yes.

18 Q. This case had not yet been filed?

19 A. Yet they knew all about it.

20 Q. But they knew it was going to happen?

21 A. Yes. And they said: "We were
22 listening to them." They specifically said: "We
23 are listening to everything they say, and sometimes
24 we listen to the sound of the toilet being flushed."

25 Q. Talking about?

1 A. Your clients.

2 Q. My clients?

3 A. And probably you. They did mention
4 that they listened to what you have to say, and who
5 you talk to, and...

6 Q. And when you spoke with them, was
7 their idea with regards to this set of facts to
8 cover it up?

9 A. Yes. Absolutely. Not in concern to
10 this case. They are worried about the crimes he
11 committed.

12 Q. The Defendant?

13 A. Yes.

14 Q. Sheik Khalid?

15 A. Sheik Khalid, that hasn't been
16 published --

17 Q. Mm-hm?

18 A. -- or known or made -- nobody was
19 aware, is made aware of. He has committed crimes,
20 they said, and...

21 Q. So paragraph 27 of this -- or excuse
22 me, 29 of this complaint states that:

23 "During his employment, Pittard
24 was solicited by Defendant Khalid
25 for the murder of two individuals.

1 In approximately late September of
2 2017 and November of 2017, in Los
3 Angeles, California, Defendant
4 Khalid asked Pittard to murder a
5 male and a female who Defendant
6 Khalid viewed as threats to his
7 social reputation and personal
8 security. Pittard refused to
9 execute these unlawful requests."

10 So these two individuals, to the best of
11 our knowledge, the best of plaintiff's knowledge,
12 have not been killed and are still alive. Do you
13 have any knowledge about the people that he was
14 asked to kill?

15 A. They didn't mention names but they
16 said what they are saying in the lawsuit is 100
17 percent correct. But they did mention that he
18 killed other people.

19 Q. So Sheik Khalid has murdered other
20 individuals?

21 A. Yes. According to the Qataris, and
22 they don't want that to come out.

23 Q. And does Sheik Khalid hold any
24 official government capacity in the Government of
25 Qatar?

1 A. No, he's a front for a company to
2 launder money.

3 (Query by reporter)

4 He's a front running a company to launder
5 money, but he is not holding a government official
6 position.

7 Q. So, to the best of your knowledge, in
8 your dealings with the Government of Qatar, Sheik
9 Khalid would never be in a position in any sort of
10 military capacity to lawfully order the murder of
11 anybody else?

12 A. He, he did order the murder of other
13 people.

14 Q. But was he -- was it in an official
15 government capacity?

16 A. No. For his own --

17 Q. Did he ever serve in the military in
18 the Government of Qatar?

19 A. Not that I know of. They didn't
20 mention that. He is not a government official.

21 Q. So, he has never served in -- for
22 example. He has never served in a military position
23 in a time of war when there might be the potential
24 that his order to kill somebody may be lawful?

25 A. No. All his killings are illegal,

1 unlawful, civilians, while he's running a company.

2 Q. So he killed people according to
3 Qatar?

4 A. According to the Qataris, yes.

5 Q. People --

6 A. And he buried them in the desert.

7 Q. Do you know how he killed them?

8 A. No. They didn't mention that. They
9 just said: "We're don't -- we are not worried about
10 those guys, we're worried about the ones he killed."

11 Q. So were they concerned that if this
12 lawsuit went public, that it would bring up anything
13 he's done, including people he actually did murder?

14 A. They said, "Yes, fadhayeh."
15 "Fadhayeh" means scandals will come up.

16 Q. Okay?

17 (Query by reporter)

18 A. Fadhayeh. F-a-d-h-a-y-e-h.

19 (Query by reporter)

20 Q. Paragraph 30 states that:

21 "During Pittard's period of
22 employment, from approximately July
23 7-10, 2018, Defendant Khalid and his
24 private Qatari security held an
25 American citizen against the

1 American citizen's will on at least
2 two occasions in one of Defendant
3 Khalid's personal residences. At
4 Defendant Khalid's request, the
5 American citizen was arrested and
6 jailed at the Onaiza Police Station
7 in Doha, Qatar. Pittard and the
8 United States Embassy came to the
9 aide [sic] of the American citizen
10 and helped the American citizen
11 reach a point of safety, and
12 eventually safely depart from the
13 country of Qatar."

14 In your meeting, did they talk about the
15 American citizen that was held against his will?

16 A. No. They just emphasized on the fact
17 that everything in the lawsuit is correct. But they
18 never denied anything. I even suggested to them, I
19 said: "Why don't you just issue a statement?"

20 Q. Mm-hm?

21 A. "Doctor up a report that you always
22 do..."

23 Q. Mm-hm?

24 A. "... and say none of this is true?"

25 They said: "Well, we say you need to be

1 star witness. You can say you were in Doha, and you
2 brought this up," that I brought it up, or it was
3 mentioned after my trip.

4 Q. Mm-hm?

5 A. And that Qatari officials have told
6 me that it's not true; and that the lawyer is
7 drumming up attention. That's...

8 Q. Did they state anything about
9 submitting an answer to the lawsuit and denying the
10 challenges or the case in general?

11 A. No. They said: "We're not
12 interested in even acknowledging a woman. We don't
13 deal with women and we're not going to be defeated
14 by women. And this lawsuit is not going to go
15 anywhere, and we're going to make it disappear."

16 Q. So in your opinion, if I was a male
17 representing these clients, they would have
18 responded in some way?

19 A. Just to deny it, yes. But they said
20 not to a woman.

21 Q. Okay?

22 A. In their opinion, responding to you
23 and this case will incite other women to think that
24 they can stand up to the government of Qatar. Hence
25 why they are abusing Princess Hend al-Qassimi. Same

1 thing.

2 Q. Even though the Government of Qatar
3 is run by Sheikha Moza?

4 A. Correct.

5 Q. Who happens to be a woman?

6 A. But that's different. She's a god.

7 You're not.

8 Q. Have to work on that.

9 A. Yeah. That's what they say.

10 Q. So if I were to read you any, any
11 paragraph of this complaint, in your opinion, and
12 based upon your discussions, the Government of Qatar
13 has no denials to these claims?

14 A. They did not deny anything. And if
15 there was something to deny, they would have
16 highlighted that to say: "See, they're adding lies
17 to the truth."

18 I gave them -- they could have told me
19 this.

20 Q. Mm-hm?

21 A. They did not deny anything. So
22 nothing here is not true.

23 Q. So they didn't say: "Rebecca
24 Castaneda, counsel for plaintiffs or counsel for
25 anybody involved in negotiations regarding Matthew

1 Pittard and Matthew Allende, is trying to blackmail
2 us"?

3 A. They told me that on the phone, that
4 this whole case is about money for the lawyer who's
5 working on behalf of the Emiratis. That's what they
6 said.

7 Q. And am I supposed to be that lawyer?

8 A. Yes. They said Rebecca, well, they
9 call you a "mado-wah" because to them even
10 mentioning a name of a woman so that is degrading.
11 So they say "mado-wah."

12 Q. And could you tell us what that
13 means?

14 A. "Mado-wah" would be m-a-d-o
15 hyphenated, and then w-a-h. Mado-wah is when you
16 want to refer to a chair or a non-human item, in a
17 way of mado-wah. Like, they don't want to give the
18 respect to mention your name.

19 Like, they refer that -- they use that to
20 refer to their enemies.

21 Q. Mm-hm?

22 A. Opponents. They don't want to give
23 them the dignity of mentioning the name so they say,
24 "so-called."

25 Q. Okay. Going to direct your attention

1 to the last page of that complaint.

2 A. Mm-hm.

3 Q. Do you see the name in bold? It says
4 "attorney"?

5 A. Yeah.

6 Q. Do you recognize that? It says:
7 "Attorney Aryeh Kaplan"?

8 A. They brought that up in a
9 conversation on the phone after I returned from
10 Qatar.

11 Q. Mm-hm?

12 A. As somebody who advised them.

13 Q. Mm-hm?

14 A. But they did not, like, elaborate.
15 They just say: "We were advised, and he said that's
16 it."

17 Q. Okay?

18 A. But that name came up. They said the
19 first name and then the second name.

20 Q. Okay. Did they mention that they'd
21 already settled with the American that was held
22 against his will?

23 A. No.

24 Q. They didn't say that?

25 A. They didn't say that.

1 Q. Did they state if anybody had
2 negotiated on that American's behalf or made
3 attempts to do so?

4 A. Sorry, repeat that question again?

5 Q. The American that was held against
6 his will?

7 A. Mm-hm.

8 Q. Did they relay to you, during your
9 meeting or at any time, that they had gotten --
10 received contact by that family or an attorney
11 regarding settlement for that person?

12 A. No. They never said to me about --
13 say anything about a lawyer or a family member.
14 They just, in the con-- in my conversations. Like,
15 on the phone, they referred to a businessman who
16 came and pretended to be trying to make a deal on
17 your behalf, or on your clients'.

18 They also referred to your clients as
19 being approached indirectly, without your knowledge,
20 by somebody who might be helpful to the Qataris.

21 Q. So this is after the suit was filed?

22 A. After.

23 Q. Okay. I was referring to before --

24 A. No, before --

25 Q. -- or during your meeting?

1 A. No, before, they didn't say anything
2 of that, no.

3 Q. Okay. So going to what you just
4 stated, you said that the Qataris have stated
5 someone has approached them on my -- stating that
6 they're on my behalf?

7 A. Correct.

8 Q. To negotiate a settlement on behalf
9 of the clients?

10 A. On behalf of you.

11 Q. On behalf of myself?

12 A. Yes.

13 Q. For reasons unknown?

14 A. No, they said the businessman has
15 claimed that he's trying to settle this matter now
16 that it's not going to go anywhere, but Rebecca
17 wants some money for her own pocket and bills, and
18 that Rebecca is planning on doing -- I mean,
19 conducting the deposition not to carry on with the
20 case, she just wants to sell it to the government of
21 the UAE and get cash so they can use the information
22 in the deposition against Qatar.

23 Q. And the deposition they're speaking
24 of is the one that's occurring --

25 A. Today.

1 Q. -- right now?

2 A. Yes.

3 Q. Okay. And you stated that they said
4 this case was going away, or now that the case is
5 going away?

6 A. Now that the case has gone.

7 Q. Okay?

8 A. First they used to say: "It's going
9 to go away. We're not going to attend." I sent
10 them the subpoenas and I said: "Are you going to
11 take this seriously?" They said: "We don't take
12 anything seriously in the U.S. We have money. And
13 the sign on their dollar says 'In God We Trust.' God
14 is dollar. We have their God so we don't need to
15 worry about it. We're not going to show up. We're
16 not even going to respond to her. And it's going to
17 go away." And they said that I'm wasting my time
18 being here.

19 Q. So their refusal to respond to
20 subpoenas or comply with them is, in their mind, as
21 far as you know, kills the case?

22 A. Yes.

23 Q. Okay. Do you know about the
24 LaFerrari incident in Los Angeles involving Sheik
25 Khalid?

1 A. Where he was speeding in a
2 neighbourhood?

3 Q. Yes.

4 A. Oh, I think I saw that, yes, in
5 social media and newspapers. Yes.

6 Q. Do you recall if -- given all the
7 information that you know, do you recall his claim
8 of diplomatic immunity?

9 A. I think I read about it. And he
10 thought he had diplomatic immunity.

11 Q. Mm-hm?

12 A. But he didn't.

13 Q. Has that incident or anything
14 surrounding that particular set of facts come up
15 with your discussions with Qatar?

16 A. When we talked about his behaviour,
17 they just said "hadm khabul" (ph.) -- "al majnun."
18 "Majnun." "Majnun." Means crazy. Lunatic.

19 Q. They described Sheik Khalid as a
20 lunatic?

21 A. Yes.

22 Q. And they described him as crazy?

23 A. Yes.

24 Q. Does he create problems for the Royal
25 Family of Qatar?

1 A. Apparently, yes. With all the
2 killings and the beatings, and currently, apparently
3 he tortures people working for him in a camel farm
4 or something like that. He would bury them halfway
5 or just to the neck to punish them.

6 He has Indian workers who had --

7 (Query by reporter)

8 Indian workers in Qatar who were punished
9 severely for spilling milk or something, I don't
10 know. Like, it didn't sound like it's worth the
11 punishment but he punished them severely, hung them
12 upside down or buried them in the sand at noon.

13 Q. With their heads sticking out?

14 A. With their heads sticking out, or
15 burying them alive as he threatens to do. So they
16 refer to him as majnun. Crazy.

17 Q. That's his nickname?

18 A. Well, not nickname but that's what
19 they refer to him now because of the mess he's
20 creating, so they say: He's a lunatic. We know
21 he's a lunatic. We just don't want to stand in
22 court and say that."

23 Q. The Government of Qatar doesn't want
24 to stand in court and say that?

25 A. Correct. Correct. And they

1 instructed the ambassador to ignore your subpoena
2 for the same reasons.

3 Q. Which ambassador?

4 A. The ambassador of Qatar in
5 Washington.

6 Q. What's his name?

7 A. Sheik Meshal Al Thani. He's in the
8 subpoena.

9 Q. Is he aware of this lawsuit? The
10 ambassador?

11 A. The ambassador?

12 Q. Mm-hm?

13 A. Absolutely, yes. And he told me --

14 Q. How do you know that?

15 A. They told me that. They instructed
16 him to do what he did.

17 Q. Which was what?

18 A. Which was bringing a lawyer, I guess
19 it's Dean Dilley.

20 Q. Mm-hm?

21 A. And tell him to do what he has done.

22 Q. So, essentially, reject the subpoena
23 or?

24 A. To reject the subpoenas and don't
25 worry about it.

1 Q. Okay. Did -- so, in your discussions
2 with Qatari government officials regarding this
3 lawsuit, their response is that there's going to be
4 no response?

5 A. Yes. They took comfort in the fact
6 that when I said: "Well, aren't you worried about
7 being, like, arrested?" He said: "What are you
8 talking about? Mohammad Al-Masnad was in the US
9 just a week ago. This was when the Emir of Qatar
10 came and met with Trump.

11 Q. Mm-hm?

12 A. And that was after your subpoenas
13 were issued and rejected. Mohammad Al-Masnad was in
14 the U.S. He said: "Did you see anywhere there
15 daring to touch him?" He said: "We run the show in
16 America, don't waste your time. Don't go."

17 Q. Were they concerned about Customs?
18 Entering or exiting the country and people having
19 awareness of them entering or exiting the country?

20 A. Nothing. Nothing. He said: "What's
21 the worst-case scenario? Change the first letter of
22 the last name."

23 Q. For what, a passport?

24 A. The passport. He said: "We can get
25 a passport in five minutes, diplomatic passport."

1 He said: "Have you ever heard of a diplomat being
2 arrested at an airport?"

3 Q. I'm assuming the answer to that
4 question is no, right?

5 A. No. Exactly.

6 Q. Does Sheik Khalid know about the
7 lawsuit?

8 A. Yes.

9 Q. Where is he now?

10 A. He is in Doha, in one of the safe
11 houses of the palace.

12 Q. Is he being held against his will?

13 A. No. He is just asked to just stay
14 there until this blows over, and that's it. He
15 said: "Don't worry, we'll send you back to the US.
16 You can drive your cars and have fun. Just give us
17 some time."

18 Q. That's the Government of Qatar
19 telling Sheik Khalid?

20 A. Yes.

21 Q. "Don't worry about this lawsuit?"

22 A. Yeah.

23 Q. "We will send you back to the United
24 States?"

25 A. He doesn't like to stay in Doha.

1 Q. Why is that?

2 A. Doesn't like the heat. Too hot.

3 Q. It is hot.

4 A. Yes.

5 Q. It is hot there.

6 A. Yes.

7 Q. And did Sheik Khalid tell them about
8 this lawsuit before it was filed, "they" being --
9 "them" being the Government of Qatar?

10 A. That part I don't know, but they knew
11 about it before he even filed it. They knew exactly
12 who's talking to who about what and when it's going
13 to happen. 'Cause...

14 Q. Do you know if he heads negotiations
15 of his attorney that he hired to negotiate with us.

16 A. No, I didn't discuss that.

17 Q. Okay.

18 A. Their main focus when they brought
19 your case up are two things: Bury the case and the
20 scandals attached to it.

21 Q. Mm-hm?

22 A. Frame Rebecca.

23 Q. And frame me?

24 A. Yes.

25 Q. And frame me how?

1 A. Of taking, taking bribes from the
2 United Arab Emirates to drum up a lawsuit that has
3 no merit.

4 Q. Okay. So the government of Qatar is
5 convinced that this case is based upon encouragement
6 from the Government of the UAE?

7 A. Yes. With payments. And that if it
8 wasn't for the UAE payments, you wouldn't have taken
9 the case.

10 Q. Yet they acknowledge that there's
11 complete merit to this lawsuit?

12 A. Yes.

13 Q. And that everything in it is true?

14 A. Yes. He said: "Those are two broke
15 clients. How are they going to afford \$300 an
16 hour?"

17 Q. Is that what they think that my basis
18 is --

19 A. That's what they think, yeah.
20 According to --

21 (Query by reporter)

22 A. Ask me again.

23 Q. Is that what they think that I'm
24 being paid for this case?

25 A. That's their assumption or that's the

1 fact that they want to convince me with, that you
2 are charging \$300 an hour and your payments are
3 coming from the UAE.

4 Q. And you stated that they had tapped
5 or listened in to conversations with my clients and
6 myself?

7 A. That's what they tell me.

8 Q. Okay.

9 A. That they hear and listen to
10 everything. Probably they just want to convince me
11 that this is a fact, what they're saying.

12 Q. And would they do that in a way to
13 encourage you to take on this cause to derail the
14 lawsuit or bury it?

15 A. To -- you mean to go after you?

16 Q. Yes. The lawsuit. Bury the
17 lawsuit --

18 A. Yes.

19 Q. Frame me?

20 A. They don't think I should be here.

21 Q. And they think -- okay.

22 And you said that they were trying to
23 frame me?

24 A. Yes.

25 Q. Why not try, if you know, to frame

1 the clients or go after the two male defendants of
2 this case?

3 A. They don't care about them. They
4 don't even mention their names.

5 Q. Why do they care so much about the
6 counsel for the plaintiffs, that being me?

7 A. Because you're their legal weapon.
8 Those guys don't have a legal weapon. And I said:
9 "So you frame this lady and then what? Another
10 lawyer will step in." They said: "No. Nobody will
11 take it. Once you hit the first one, you set an
12 example."

13 Q. Is the Government of Qatar trying to
14 set a tone similar to Tawhidi, that anybody who sues
15 the Government of Qatar or a Royal family member
16 will be met with repercussions?

17 A. 100 percent.

18 Q. Outside the judicial system?

19 A. Correct. That's exactly what they
20 want to do.

21 Q. Does that include hiring private
22 investigators, if you know, to follow me or my
23 clients?

24 A. They didn't admit to me but that's
25 what they do to intimidate or to send a message and

1 see if that will force you to back down.

2 Q. The Government of Qatar?

3 A. The Government of Qatar.

4 Q. Hires --

5 A. They do that all the time. They
6 didn't deny to me doing that. But they did in
7 different cases. Sometimes they follow people who
8 are on their payroll to see who they speak to.

9 Q. Mm-hm. Do you know if they direct
10 their legal counsel to do the same, to engage in a
11 smear campaign or to engage in activities to
12 threaten other -- opposing counsel?

13 A. They didn't say that to me.

14 Q. Okay. Do you know how they typically
15 respond to legal allegations or cases filed against
16 them?

17 A. They usually respond immediately
18 through their media attaché. And that's one of the
19 things they said to me, they said: "If we thought
20 this is a serious person --" referring to you -- "we
21 would have issued a statement. But we are not even
22 giving her the time of the day. We are completely
23 ignoring it. And there's nothing she can do."

24 Q. When you say they're completely
25 ignoring, you mean in the legal system?

1 A. In the legal system, yes.

2 Q. Has, to your knowledge, Qatar
3 attempted to engage journalists to wage a smear
4 campaign against myself or my clients?

5 A. They will, is what they said.

6 Q. They will?

7 A. Yes, but they need me to confirm it.
8 They actually detailed it. A call will come to me
9 from a prominent reporter asking me if Rebecca has
10 contacted you after the subpoena and if she admitted
11 to you that she will take personal cash and wash it
12 away, and whether she admitted to you that she is in
13 contact with Abu Dhabi, and that she's friends with
14 them and that they are helping her. And all you
15 have to say is yes, and they will publish as a
16 reliable source, confirmed.

17 Q. You being the reliable source?

18 A. Me being the reliable...

19 Q. And which country is Abu Dhabi in?

20 A. United Arab Emirates.

21 Q. UAE?

22 A. UAE. The capital of the UAE.

23 Q. When you talked about hiring
24 journalists to engage in writing or not writing, so
25 failure to publish anything, are those journalists

1 ever specifically told by the Government of Qatar
2 what to write?

3 A. Correct, yes.

4 Q. So they are specifically directed to
5 write something in a manner including certain facts?

6 A. Yes.

7 Q. And, to your knowledge, do those
8 journalists misstate the truth and know that they're
9 misstating the truth?

10 A. Sometimes. Yes. Some journalists,
11 yes. Some journalists. Other journalists will say
12 to them: "I don't want to know whether it's true or
13 not. Just tell me your information."

14 Q. What you're saying?

15 A. Yes.

16 Q. So journalists will tell a government
17 what -- ask: "Tell me what to say."

18 A. Yes.

19 Q. "Tell me what to write."

20 A. Yes. Some. Some journalists, yes.
21 Others say: "I need facts."

22 Q. So that's usually what journalists
23 do, right, is write about --

24 A. Maybe one, one --

25 (Query by reporter)

1 Q. So that's usually what journalists
2 do, is to write about facts, about the truth?

3 A. Unfortunately that's what I thought
4 too, until I went to Doha.

5 Q. And how are the journalists paid?

6 A. Some journalists will be invited to a
7 convention in Doha, a media convention.

8 Q. Mm-hm?

9 A. And they get paid cash, yes.

10 Q. And you said that you first met
11 government officials of Qatar in regards to the head
12 of the media centre that's in Doha, correct?

13 There's a media --

14 A. Abdullah Al-Athbah is the head of the
15 media centre.

16 Q. Now, wasn't that recently closed?

17 A. Oh no. That's a freedom of the press
18 centre --

19 Q. Okay?

20 A. -- that was closed because they don't
21 need freedom of the press anymore, they own it all.

22 Q. So they've closed that because --

23 A. They've closed it, they don't need it
24 any...

25 Q. Operating expenses, no longer needed.

1 Okay.

2 A. We own them, so why leave a...

3 Q. Yet they'll hold a media conference
4 in the country where they just closed this?

5 A. Yes.

6 Q. Okay. And I assume that they're
7 given gifts? Cash?

8 A. Cash, gifts, Rolexes, diamond
9 necklaces to their wives or girlfriends.

10 Q. Mm-hm? Or both?

11 A. Or both. If it's cash, they keep it
12 under a specific amount so they won't raise a red
13 flag if that person got caught.

14 Q. Meaning it's under \$10,000

15 A. Yes.

16 Q. So that they can enter the United
17 States?

18 A. And without declaring it.

19 Q. Do you know if the Government of
20 Qatar's Custom rules allow for the transfer and
21 transportation of more than \$10,000 in currency or
22 any monetary instruments?

23 A. I don't -- yes, I don't think they
24 have any restriction. You can...

25 Q. So Qatar's concern is not with its

1 own Customs and somebody leaving, it's entering the
2 United States and somebody having more than \$10,000
3 coming from the country of Qatar?

4 A. Correct.

5 Q. In cash?

6 A. Correct.

7 Q. Or monetary instruments?

8 A. Or monetary instruments.

9 Q. Okay?

10 A. They even advise them: "When we give
11 you a diamond watch, make sure you either wear it,
12 or your wife or your girlfriend, because you're
13 wearing it, you're using it, so you don't really
14 have to declare it."

15 Q. Mm-hm. So that advice was provided
16 by somebody who apparently is familiar with US
17 regulations regarding gifts from foreign
18 governments?

19 A. Absolutely. They are fully aware of
20 all the loopholes of the US rules and laws.

21 Q. Do you know how much journalists are
22 paid? You mentioned that they can go as high as a
23 million and sometimes it's just 5,000?

24 A. Yes.

25 Q. Is there a reoccurring salary

1 structure of journalists who write frequently for
2 the Government of Qatar, or don't write anything?

3 A. Yes. Correct. That's true. They
4 have journalists on their payroll on monthly basis.
5 Whether they write or they don't write, they get
6 paid, because that's what the journalists have
7 requested. Because some journalists will go through
8 a whole year without writing a report.

9 Q. Mm-hm?

10 A. But they can also be dangerous by
11 publishing one report that contains dirty secrets.

12 Q. Valid truth about the Government of
13 Qatar?

14 A. Exactly. So to keep them at bay we
15 keep them on our payroll whether they write or not.

16 They did mention the name of Karen Attiah,
17 a reporter of the Washington Post, as an example.
18 And they said she went from living in a basement
19 to...

20 Q. Not living in a basement?

21 A. To Gucci and all the fancy names in
22 her purses. Cartier's.

23 Q. Luxury items?

24 A. First-class tickets to London to
25 attend the Jamal Khashoggi-related propaganda.

1 Q. Which would obviously be in support
2 of the Government of Qatar's initiative because that
3 case, obviously, severely harmed the public image of
4 the --

5 A. Exactly.

6 Q. -- Government of Saudi Arabia?

7 A. And that's why they bring it up again
8 and again and again. And this time they raised the
9 stakes by bring really big names, like the guy who
10 owns Amazon, who owns the Washington Post.

11 Q. Mm-hm?

12 A. He flew all the way to Istanbul. And
13 he kissed the portrait of Jamal Khashoggi like he's
14 a relative. So --

15 Q. Does he know about the dealings of
16 the Government of Qatar with the United States?

17 A. I don't have evidence he knows, but I
18 doubt it very much that he wouldn't know; I mean, he
19 owns the Washington Post. He should know.

20 Q. So he knows? Would it be fair to
21 assume he knows?

22 A. I would assume, yes. And he also
23 accused the Government of Saudi Arabia of hacking
24 his phone. I don't think a man in his position
25 should even bother make an accusation like that

1 unless there is political gain behind it.

2 Q. Mm-hm? Are the payments you
3 mentioned that different things involving the
4 Government of Qatar recorded? Are the payments or
5 any sort of remuneration made to journalists, news
6 reporters, recorded?

7 A. Everything.

8 Q. So every payment Qatar has ever made
9 has been recorded?

10 A. And they have a ledger.

11 Q. Who maintains that ledger?

12 A. Mohammad Al-Masnad and his wife.
13 They want to know everybody is being paid: When,
14 how much, why. No journalists will be paid a dollar
15 without his permission. That's what he says.

16 Q. Because you need a return on your
17 investment?

18 A. Yes.

19 Q. And in talking about ledgers, does
20 Sheik Khalid maintain a ledger of his money
21 laundering activities on behalf of the Government of
22 Qatar?

23 A. Yes.

24 Q. Did he state that he had that
25 whenever this case arose?

1 A. These are the instructions to anybody
2 who runs a money laundering front for the Government
3 of Qatar. They have to keep records and track of
4 everybody and hand it back to, through diplomatic
5 courier, so Qatari embassies will work as
6 messengers. Nobody searches diplomatic...

7 Q. Pouches. So Sheik Khalid is a money
8 laundering front for the Government of Qatar?

9 A. Is one of. Yes.

10 (Query by reporter)

11 Sorry.

12 Q. So Sheik Khalid is a money laundering
13 front for the Government of Qatar. And I said a
14 money laundering front, one of them?

15 A. One of them.

16 Q. So he most likely has a ledger?

17 A. Yes.

18 Q. And do you think, based upon your
19 business dealings and conversations with the
20 Government of Qatar, that if Qatar were to throw
21 Sheik Khalid under the bus and say: "Yes, we know
22 you're crazy, you are crazy," do you think he would
23 use that ledger of money laundering activities
24 against the Government of Qatar?

25 A. That's what they were afraid of.

1 That's why they asked him to fly back to Doha and
2 stay there.

3 Q. Where was he -- are you talking about
4 when this lawsuit was filed?

5 A. After the lawsuit, he was ordered to
6 flee.

7 Q. Was he in the United States?

8 A. I don't know where he was.

9 Q. But he was ordered to return to
10 Qatar?

11 A. To Qatar, yes.

12 Q. Do you know where he travels? Is it
13 outside the United States or?

14 A. You mean, currently?

15 Q. At all? At any point in time?

16 A. No, they didn't bring his name up
17 again. That's it. I think he's under the
18 protection of Qatari intelligence in a palace, and
19 that's it.

20 Q. In your dealings with him, does that
21 seem to you like they must be concerned, then, about
22 what he's doing and where he might go?

23 A. Yes. They can't leave him allowed to
24 be loose because somebody can kidnap him, if he is
25 in another capital, and then force him to spill the

1 beans.

2 Q. And when you say "they," do you mean
3 the United States or another country?

4 A. Could be. It could be US
5 intelligence, or companies, or even his own
6 financial opponents. Could be anybody.

7 Q. So private citizens?

8 A. Could be. They don't want to take
9 the risk of anything like that happening, so you
10 bring him to Doha.

11 Q. Where he has everything except
12 freedom?

13 A. Yes. If needs be to travel, they
14 will issue him a diplomatic passport with a
15 completely different name because there is no
16 Interpol arrest warrant against him. He can travel.
17 But he has to be accompanied by a member of the
18 Qatari intelligence to go to Europe, maybe skiing, a
19 destination that he likes. But it has to be a
20 different name.

21 Q. Mm-hm?

22 A. Which they can issue in, like, two
23 minutes. Diplomatic passport, so nobody's going to
24 stop him. You don't have a warrant against him. So
25 he can enjoy life.

1 Q. So they're not concerned -- well,
2 they're concerned about him potentially entering the
3 country, the United States?

4 A. Yes.

5 Q. But not so much travelling --

6 A. Yes.

7 Q. -- outside?

8 A. He wouldn't come to the US until it's
9 blown away, which is what they promised him.

10 Q. You talk about controlling the press.
11 Is that a bigger effort that Qatar is trying to push
12 in creating a positive public image of the country?

13 A. Yes. They reached a conclusion that
14 think tanks have advised them --

15 Q. Mm-hm?

16 A. -- that they shouldn't worry too much
17 about the opinion, or general opinion, of the people
18 of Qatar because they will be herded like cattle.

19 Q. Well, aren't they all held in
20 political prisons and kicked out of the country
21 anyway?

22 A. Exactly. So they don't care about
23 what the people of Qatar would think because they
24 have no ability to think or do anything that will
25 influence the government.

1 The think tanks in the US have advised
2 them to focus more on buying and recruiting
3 journalists because American public is just naïve
4 people who read the headlines.

5 Q. And those think tanks are owned by
6 the Government of Qatar, correct?

7 A. Yes. And the US.

8 Q. Was Qatar's attempt -- well, their
9 successful bid of the soccer cup one of the many
10 items that they're trying to push to make a very
11 positive public image of the country?

12 A. Yes, and that's why they paid over
13 \$400 million worth of bribes, cash, to FIFA
14 officials, which resulted in huge investigations and
15 FBI arrests, and they all got \$400 million worth of
16 cash to make this happen.

17 Q. To --

18 A. To beat the US, because US was this
19 close to winning World Cup, and Qatar beat them.

20 Q. Was it intentional to defeat the
21 United States bid for the soccer cup?

22 A. Yes, it felt like David and Goliath,
23 as they call it. Except David this time wasn't
24 using a stick or a sword, he was using cash.

25 Q. Okay. Does the Government of Qatar

1 own Al Jazeera?

2 A. Yes.

3 Q. And is that another way that they
4 control their public image?

5 A. Internally and externally. Hence why
6 some of the big names in Al Jazeera have diplomatic
7 licence plates on their cars.

8 Q. Does it strike so you as odd for a
9 media company, having worked in media and with media
10 individuals as long as you have?

11 A. Very odd. Very odd.

12 Q. Does that signal to you impropriety?

13 A. Yes. If it was in a civilized
14 country, I would be shocked that this is happening,
15 but in Qatar it's not shocking because I know that
16 they do these things. And I went there, and I saw
17 it, and we went through the gate, and... It's
18 fortified like a military barrack.

19 Q. Is that odd to you as well, that a
20 news broadcast company that talks about soccer cups
21 and the weather has that type of security?

22 A. Yes. And it raised a question. So I
23 asked the guys, Abdullah Al-Athbah: "What is the
24 gate, barbed wires and all that?" He said --

25 Q. Barbed wire?

1 A. Yes. And he said: "Well, you have
2 to worry about what's under it."

3 Q. And what is under it?

4 A. I think I was informed that they have
5 the -- they run all the fake media and social
6 activities from something under the Al Jazeera
7 building. But yes, you can't enter without
8 permission and prior clearance and all that.

9 And he says: "Well, we always say, well,
10 we don't want Al Jazeera famous anchors to be harmed
11 so we want to be extra cautious." But it has other
12 purposes. It's owned by the Government of Qatar 100
13 percent.

14 Q. They concern -- they're concerned
15 about the safety of journalists at Al Jazeera while
16 located in Qatar?

17 A. And that's why I didn't buy it. And
18 he knows I didn't buy it, so we just laughed off.

19 Q. Would you agree that the flow of
20 information and the control of it is vital to the
21 country of Qatar's success in diplomacy, in
22 business, in society?

23 A. Yes. And that's one of their new
24 polices. They also look back to a week after the
25 siege started. They had their ambassador sitting in

1 a conference room which she invited every media
2 outlet in the US. Nobody showed up. At that time
3 Qatar hasn't recruited anybody.

4 So they went to the think tanks: What are
5 we supposed to do? They said: "Don't worry about
6 the American public, just recruit media outlets and
7 tell them to write headlines that make you look
8 good. American politicians will come after you
9 sound good or look good in the media.

10 Q. Mm-hm?

11 A. To justify making deals with you.
12 And that's what they did. The room was empty. Not
13 one single reporter showed up to a press conference
14 by the ambassador "Lulwah al-Khatr" (ph.)

15 Q. You're talking about the video?

16 A. Yes, where she's talking to empty
17 chairs.

18 Q. Of a woman with an empty room?

19 A. Correct. So...

20 (Query by reporter)

21 Lulwah al-Khatr (ph.). She was talking to
22 an empty room, empty chairs. And that was just
23 after the siege, where Trump went public and said
24 Qatar's sponsoring terrorism.

25 Q. Mm-hm?

1 A. Then he came back a year later and
2 \$180 billion later to say: "The Emir of Qatar is a
3 good man. We love him."

4 Q. The Emir of a Qatar might be a good
5 man, but he's not the one running the country?

6 A. No. But --

7 Q. His mother is?

8 A. His mother, Mohammad Al-Masnad, but
9 he agrees with everything. He never objects to any
10 of these policies.

11 Q. Is he in a position to do that?

12 A. Yes. He's in the room. I mean, when
13 they decide these things, he has an opinion. But he
14 never said it's not a bad idea -- that's bad. Let's
15 not do this. Even the fact that they're torturing
16 Princess Hend, he's aware of it.

17 Q. Princess who?

18 A. Hend a-Qassimi, in the case of her
19 son trying to leave.

20 Q. Mm-hm?

21 A. Because she is an Emirati citizen, a
22 daughter of one of the Emirati rulers, he's fully
23 aware that she's suffering, her son is suffering.
24 And he's the one who issues orders saying: "Don't
25 help her. Leave her."

1 (Query by reporter)

2 Orders saying: "Don't help." Because he
3 can make one decision today and her entire ordeal
4 will be solved.

5 Q. And you're talking about the princess
6 who is no longer married under Emirati law to an
7 Al Thani who is the brother, or half brother, of the
8 Emir.

9 A. Yes.

10 Q. And Qatar is refusing to acknowledge
11 the divorce?

12 A. Yes.

13 Q. Or give her son, who is also the son
14 of an Al Thani family member?

15 A. Yes.

16 Q. Any rights?

17 A. Yes. And he was deprived from
18 education too. The Emir of Qatar is aware, the
19 Government of Qatar is aware, that this little kid
20 who is -- all he talks about now, because he's
21 psychologically destroyed, is about suicide at the
22 age of what, 13.

23 Q. And what is the reason for the
24 deprivation of his basic rights?

25 A. His mother is an Emirati. They want

1 to punish the UAE through her.

2 Q. So the Government of Qatar wants to
3 punish the Government of UAE and they're using a
4 minor child as a pawn to do so?

5 A. Yes.

6 Q. And do they have any awareness that
7 that child, the minor child, is also a Qatari Royal
8 Family member?

9 A. Yes. And they read his medical file
10 and they know that he is talking about committing
11 suicide because he hasn't been allowed to go to
12 school to play with kids his age and be treated like
13 a normal human being.

14 Q. Do they have any intention of ever
15 providing the minor child with rights, basic
16 healthcare, education?

17 A. Not voluntarily, no, but by pressure,
18 political pressure, yes.

19 Q. Would that be done through the media?

20 A. The social media might help make it
21 happen, but individual influence, individual
22 influence, direct contact.

23 Q. Mm-hm?

24 A. Plays a role in that. Yes.

25 Q. So, just based upon your personal

1 experience with this, is the United Arab Emirates
2 going to have to take action regarding the minor
3 child, in order for him to have any sort of basic
4 rights?

5 A. It would help a lot if they do, but
6 they are not taking any action. It would help, yes,
7 if they turn it into an international...

8 Q. Issue?

9 A. Yes.

10 Q. One of concern.

11 A. Yes. But they're not doing that.

12 Q. Based on the diplomatic relations
13 between the countries?

14 A. Yes. And the fact that they didn't
15 want her to go to Doha during the siege.

16 Q. And she did it anyway.

17 A. She did it to follow her son, yes.
18 So she got trapped.

19 Q. And now Qatar is holding her son?

20 A. Hostage.

21 Q. Essentially hostage?

22 A. And leverage.

23 Q. Do you know the name Joseph Jourieh?

24 A. No.

25 Q. Jason Mollenbrink?

- 1 A. No.
- 2 Q. John Connor?
- 3 A. No. No.
- 4 Q. Iman Shahani?
- 5 A. No. May I ask who they are?
- 6 Q. Individuals involved within the case?
- 7 A. I personally don't know them, no.
- 8 Q. Okay?
- 9 A. And their names weren't brought up in
- 10 conversations.
- 11 Q. What about Ramez Tohme?
- 12 A. Heard of the name, but I don't know
- 13 him. I don't know of him. I never met him. I --
- 14 the Qataris didn't discuss his name with me.
- 15 Q. Okay. What about someone known as
- 16 Doctor "Tom Tom" or "Tohme Tohme"?
- 17 A. I heard of the name, yes. It came up
- 18 in a conversation with Abdullah Al-Athbah. I asked
- 19 him: "What is this guy?"
- 20 Q. What did he say?
- 21 A. He said: "One of ours."
- 22 Q. "One of ours?"
- 23 A. That's it.
- 24 Q. Meaning somebody on Qatar's payroll?
- 25 A. According to him. The way he put it.

1 Q. Did he elaborate on the connection?

2 A. No. He didn't want to.

3 Q. He didn't want to?

4 A. Yeah. When he says: "Khal annak"
5 that means let's leave it alone. Forget about it.

6 Q. So you asked a question that made
7 somebody answer...

8 A. Leave it alone.

9 Q. Let's leave it alone?

10 A. Yes.

11 Q. When you asked him who Dr. Tohme --

12 A. What is the story --

13 Q. -- or Tom Tom --

14 THE REPORTER: Doctor?

15 THE WITNESS: Tohme.

16 BY MS. CASTENEDA:

17 Q. Tohme is, his answer was, let's leave
18 it alone.

19 A. Leave it alone. Yeah.

20 Q. Did that strike you as odd?

21 A. No. Knowing what I know about them,
22 I can catch their phrases.

23 Q. Mm-hm?

24 A. And I know what's underneath; that's
25 just the tip of the iceberg. So I know. I know

1 when not to elaborate. Maybe he is being monitored.
2 Maybe 'cause it's a phone call. Maybe because
3 somebody sitting next to him that will be held as a
4 witness. Maybe he just doesn't want to touch that
5 file. So I know not to ask again.

6 Q. So he indicated to you that he knew
7 that name?

8 A. It sounded, yeah. He didn't say I
9 don't know who it is, but he said: "Khal annak."

10 Q. And he was not inclined to talk about
11 it?

12 And you don't know the name Joseph
13 Jourieh?

14 A. No.

15 Q. Okay. So what is Qatar's next step?

16 A. With regards to?

17 Q. Everything?

18 A. They have a lot of next steps. But
19 their main goal is to control the White House; and
20 bring in more Sisters in the Senate; and control
21 more reporters; recruit more politicians. That's
22 their next step.

23 Q. What's the Qatar Foundation.

24 A. I think it's one of their charity
25 funds related matters. I never dealt with them. It

1 comes up in conversations but they use it to justify
2 funds also.

3 I think you -- they -- it came also with
4 regards to some payments they made here in Canada,
5 because they made payments to entities in Canada to
6 recruit people. Not as much as they do in the US.

7 Q. Mm-hm?

8 A. But in Canada they did that. So I
9 know more about Qatar Investment Authority.

10 Q. And what is that?

11 A. The --

12 Q. Authority that has...

13 A. Cash cow.

14 Q. Money to invest?

15 A. \$624 billion surplus of cash to be
16 used any which way needed. And now Mohammad
17 Al-Masnad is the guy in charge.

18 Q. He's busy, huh?

19 A. Counting money and spending it.

20 Q. The Qatar Foundation is, do you know
21 if that's, where that's headquartered or?

22 A. No.

23 Q. You said that you know they use it
24 for public activities. Is it used as a money
25 laundering front?

1 A. It came up as a source of providing
2 funds to specific individuals.

3 Q. Individuals?

4 A. Yes.

5 Q. Okay.

6 A. It came up.

7 Q. Individuals in need?

8 A. No. Individuals pretend to be in
9 need as per the request of the Qataris to justify
10 the payment to them.

11 Q. Okay. So that would -- you would
12 agree that --

13 A. I would call it money laundering.

14 Q. -- that's called money laundering?

15 A. Yes.

16 Q. Correct?

17 And the Qatar Investment Authority, do I
18 have that name right?

19 A. Yes.

20 Q. Is that a publicly traded company?

21 A. Correct, yes.

22 Q. And is that registered here -- well,
23 we're in Toronto. Is that registered anywhere in
24 the United States or Canada as a business that can
25 properly trade, buy, conduct business transactions?

1 A. I don't know if it's registered. I'm
2 assuming, because they do a lot of business in the
3 US.

4 Q. Mm-hm?

5 A. And also in Canada. And Europe.
6 They are the source of investments for Qatar
7 worldwide.

8 Q. And when you say "investments,"
9 you're talking about the flush of cash into a
10 business?

11 A. Yes, and acquiring properties,
12 companies.

13 Q. Mm-hm?

14 A. Buildings, banks. Everything.

15 Q. So if Qatar wanted to acquire people,
16 do they do that through the Investment Authority or
17 is that done through the Qatar Foundation?

18 A. I would lean more -- actually, both.
19 It depends on who are they recruiting.

20 Q. Mm-hm?

21 A. If it's charity-related matters.

22 Q. Mm-hm?

23 A. They give it...

24 (Query by reporter)

25 Who they are trying to pay. If it's an

1 entity or individual covered with
2 humanitarian/religious related matters, they go to
3 the Foundation. Qatar Investment Authority will be
4 business, briberies, and ownerships. They do own a
5 lot of properties.

6 Q. Lawfully?

7 A. Lawful. Yes, lawfully.

8 Q. They do conduct lawful business
9 activities?

10 A. Yes. They do. And Brookfield is one
11 of the companies. Brookfield is \$42 billion worth
12 of assets. And the Qatari Investment Authority is
13 in partnership with them.

14 Q. Mm-hm?

15 A. So it's the big bag they use to
16 basically do everything in the world.

17 Q. Do you know if the Government of
18 Qatar has any Americans on payroll at the embassy,
19 US embassy, in Doha?

20 A. They brought that up as recruiting
21 not only American embassy but, they said, we have a
22 lot of people working in embassies in Doha on our
23 payroll.

24 Q. Mm-hm?

25 A. Which is apparently very common.

1 Q. Mm-hm?

2 A. In many countries. The US tries to
3 recruit people working in embassies in Washington.
4 Other countries do the same. But the Qataris use
5 different methods. Temptations; sexual weaknesses.
6 They target people who are gay, working at the
7 embassy.

8 Q. Is being a homosexual in the country
9 of Qatar illegal?

10 A. Illegal, yes.

11 Q. Do you know what the punishment is?

12 A. Yes. It could be jail or -- if you
13 are lucky, jail, if not, then life sentence for
14 being gay or lesbian or even doing something sexual
15 to show that.

16 So they look for weaknesses in local
17 employees working at embassies in Doha.

18 Q. Mm-hm?

19 A. And then they approach them the same
20 way they approach...

21 Q. All the other investments they make
22 in people?

23 A. And reporters, yeah. They see the
24 weaknesses. Does he need money? She needs money.
25 Does she have a secret relationship with somebody

1 who lives in Qatar?

2 A. So we videotape her.

3 Q. Mm-hm?

4 A. Catch her.

5 Q. Mm-hm?

6 A. And say: "We'll make this go away,
7 don't worry about it. Like it never happened.
8 Let's just be friends." And that's it.

9 Q. Do you know if the Department of
10 State or any employees on Qatar's payroll are
11 engaged in official government work that ignores
12 FOIA requests or requests for information for this
13 lawsuit?

14 A. Can you give an example.

15 Q. So if a FOIA request was made, or
16 information for documentation, regarding the
17 activities that occurred in Doha last summer?

18 A. Mm-hm.

19 Q. Which are the basis of this case?

20 A. Mm-hm.

21 Q. Do you know if anybody on Qatar
22 payroll is willfully ignoring that information
23 request?

24 A. If they are on Qatar's payroll, they
25 will ignore it because Qatar will ask that, and

1 that's why they are so confident that this case is
2 going nowhere. They can't have access -- I said:
3 "Are you telling me now even federal judges are on
4 your payroll?" He said: "Bigger than that."

5 Q. Federal judges are on the payroll?

6 A. I asked. And I said: "Are you
7 telling me federal judges are on your payroll?" He
8 said, "No, bigger than that."

9 Q. So they said no?

10 A. Yes. He said --

11 Q. There's no federal judges on payroll?

12 A. He says: "No, bigger than that."
13 "Bigger than that," I don't know what that means.
14 He said: "But it will be helpful if Rebecca can
15 bring us this judge to recruit. Maybe this is an
16 opportunity to recruit this judge."

17 Q. They want me to do that?

18 A. No. They want to do it by you bring
19 up the name of a judge.

20 Q. Ah.

21 A. Who they can approach.

22 Q. So Qatar's goal, if they were to have
23 one related to this case besides just ignoring it,
24 would be to recruit the federal judge?

25 A. To them, yes. If that's what needs

1 to be done, they will do it. But they need to
2 approach it very cautiously and very carefully.
3 They said: "We need to make sure that they don't
4 get in trouble."

5 Q. Do you know if they have attempted to
6 pay off the judge in this case?

7 A. They did not say anything about that.

8 Q. You mention that they had approached
9 the plaintiffs outside of counsel, me?

10 A. Yes.

11 Q. In an attempt to settle the case?

12 A. That's what they told me. I don't
13 know if that's true because it didn't sound very
14 logical.

15 Q. And here we are, in Toronto, Canada?

16 A. Yes.

17 Q. Conducting a deposition?

18 A. Yeah. So it didn't make any sense to
19 me.

20 Q. Okay. Do you know if there are any
21 Qatari government officials or people on payroll at
22 Central Command in Tampa, Florida?

23 A. Specific locations will not be
24 discussed, but they have hinted that they have
25 military guys who are on their payroll; they have...

1 Q. US military?

2 A. Yes. They have -- he said:

3 "Wherever there is a human being, there is weakness.

4 And we know how to address a weakness."

5 Q. I'm going to ask you a couple of
6 places if you know if they have -- if anything comes
7 to mind specifically, or specific discussions.

8 Department of Justice?

9 A. Specifically, they did not mention
10 the name, no.

11 Q. Department of Homeland Security?

12 A. They did not mention the name
13 directly, no.

14 Q. Department of State?

15 A. In Doha, yes.

16 Q. In Doha?

17 A. They said -- they brought that up.

18 Q. Why does that one stand out? That
19 seem like an important payroll to you?

20 A. I think because we were talking about
21 information may be leaked through Ministry of
22 Foreign Affairs, they call it.

23 Q. Mm-hm?

24 A. And they said: "We have our guys
25 there. We would know about it if it comes from the

1 Ministry."

2 Q. Okay. The White House?

3 A. Jared Kushner.

4 Q. What about his wife?

5 A. He said: "We paid her but the Saudis
6 beat us to that so they decided Jared Kushner will
7 take from Qatar and Saudi Arabia, she takes from
8 Saudi Arabia."

9 Q. What about any other members of
10 Congress other than the ones we've discussed?

11 A. They didn't want to mention names.
12 They just nodded yes. And I said: "Are there ones
13 other than Ilhan?" They nodded yes.

14 Q. So you asked these specific questions
15 I'm asking you right now?

16 A. Well, this specific question I wanted
17 to know because they wanted me to be the backup.
18 And I said: "What if her colleagues in Congress
19 turn against her? They said: "No, they won't. We
20 got their weaknesses covered."

21 Q. Okay. House of Representatives?

22 A. Yes.

23 Q. FBI?

24 A. No.

25 Q. DEA?

1 A. They didn't mention these things.

2 Q. HSI, which is also known as Homeland
3 Security Investigations?

4 A. They didn't mention that.

5 Q. United States Coast Guard?

6 A. No.

7 Q. Good.

8 A. So you're safe. And your friends.

9 Q. United States Army?

10 A. They said soldiers in Qatar. So
11 soldiers stationed in Doha.

12 Q. Okay.

13 A. And Al Udeid.

14 Q. United States Air Force?

15 A. No.

16 Q. United States Marine Corps?

17 A. No.

18 Q. So United States Army stands out to
19 you in your discussions because of the phrase
20 "soldier"?

21 A. "Soldiers," yes. So, you know,
22 "soldiers" in Arabic, "jnood."

23 Q. Mm-hm?

24 (Query by reporter)

25 A. J-n-o -- well, "j," "n," double "o,"

1 "d." So "jnood" could be, could be marines, could
2 be army, could be special forces.

3 Q. Mm-hm?

4 A. But nothing airborne, nothing navy.
5 "Jnood" is just that.

6 Q. And that was my next question: Is
7 the United States Navy?

8 A. No.

9 Q. No?

10 A. That will be "bahria." Bahria, no.

11 Q. So there's no confusion, there's
12 nobody in the maritime world that is on Qatar's
13 payroll?

14 A. No.

15 Q. That you know of, that you've
16 discussed?

17 A. That, yeah, they didn't even bring it
18 up.

19 Q. Okay. What about ATF?

20 A. They didn't bring that up.

21 Q. Okay.

22 A. No.

23 Q. Okay. And the questions I asked you
24 just now, and frankly all of the questions, this is
25 information that you believe they would have shared

1 with you truthfully?

2 A. It depends on the topic. Like, if
3 I'm asking them based on a thing they asked me to
4 do --

5 Q. Mm-hm?

6 A. -- or they want me to do --

7 Q. Mm-hm?

8 A. -- they have to answer truthfully,
9 because they know that I have my ways to find out if
10 they lie to me.

11 Q. Mm-hm. And that's why they hired you
12 in the first place, right?

13 A. Yes. Well, one of the things. Aside
14 from my looks, you mean.

15 Q. And your language abilities?

16 A. Yes. Yes. I have my ways to find
17 out the truth. If they lie to me, then they'll be
18 in a lot of trouble.

19 Q. Does the Al Thani family have family
20 members that fear each other?

21 A. What do you mean exactly?

22 Q. Are there Al Thanis that fear other
23 Al Thanis?

24 A. Yes. Oh yes. Even the Al Thanis are
25 fearing non-Al Thani, which is Al-Masnad. They're

1 all afraid of him.

2 (Query by reporter)

3 Non-Al Thani, yes. Mohammad Al-Masnad is
4 the most feared man in the entire establishment of
5 Qatar. I knew about it. Until I met him, I know
6 that it's a fact. He can remove a minister who is a
7 member of Al Thani within an hour from his position.
8 So, yes, they're afraid of him.

9 And there's a power struggle in, within,
10 al Thani. But the ones who are opposed to what the
11 other team is doing, which is already in charge,
12 including Al-Masnad.

13 Q. Mm-hm?

14 A. They're too afraid to make it too
15 obvious.

16 Q. Because of prior, past history of the
17 country?

18 A. Yes.

19 Q. And the political prison?

20 A. Yes. And the possibility of losing
21 your head.

22 Q. And what about the lack of resources?
23 The flow of money? Does it stop if you speak up?

24 A. Yes, Mohammad Al-Masnad controls the
25 money now. He controls Qatar Investment Authority,

1 that's 600 million --

2 (Query by reporter)

3 Mohammad Al-Masnad controls it and that's
4 controlling \$600 billion plus. You can't do
5 business without that. Or a military coup.

6 They want to recruit everybody, including
7 our Prime Minister. They said if that's possible,
8 let's do that.

9 Q. Your country's Prime Minister?

10 A. Yes. They know my relationship with
11 the prime minister. I said, not in a million years.

12 Q. So what is their next step for this
13 case, ignore it?

14 A. Completely. And it's not going to go
15 anywhere. That's what they keep saying. I said:
16 "Who told you that?" They said: "The lawyer. We
17 have it in writing. It's gone. It's done."

18 Q. Which lawyer?

19 A. I think they're referring to Dean.

20 Q. So the only lawyer that Qatar has
21 somewhat engaged in this entire legal proceeding?

22 A. Officially, yes.

23 Q. Yeah. The one that, I believe it's
24 Exhibit 3?

25 A. 3. Correct. They assume, or they

1 claim, that they have assurance in writing that this
2 case is gone, is done. And this whole deposition is
3 just for you to provide the Emiratis with invaluable
4 information that they couldn't have access to unless
5 it comes from someone who sat face to face with
6 Mohammad Al-Masnad.

7 Q. Why do you think they believe it's
8 the Emiratis?

9 A. I have no idea.

10 Q. Aren't there many countries in the
11 Middle East?

12 A. Or at least Saudi Arabia. They
13 insisted it's Emirati. I don't know why.

14 Q. I don't either.

15 A. Even the report they are hoping they
16 can convince me to back up is going to say that you
17 work for the Emiratis, not the Saudis.

18 Q. But if they have phone records and
19 are listening to my conversations, wouldn't they
20 know exactly who I was working for if it wasn't for
21 the basis of --

22 A. Absolutely.

23 Q. -- having --

24 A. But do they care about what the truth
25 is? They don't care.

1 Q. Apparently not, if it's not to their
2 benefit.

3 (Query by reporter)

4 A. About the truth, or what the truth
5 is, they have been doctoring up so many reports they
6 don't care anymore. Everybody -- everything they
7 print is being believed.

8 Q. Well, that's their opinion, right?

9 A. That's their opinion.

10 Q. They think people are believing it?

11 A. When you publish it through the New
12 York Times, Washington Post, CNN, a lot of people
13 will believe it.

14 Q. It has a lot of impact?

15 A. Yes. And that's why they aimed for
16 those three outlets.

17 Q. Do you have anything else you would
18 like to share?

19 A. I have a tonne of things in my head,
20 but I don't know what it is that you need to know.
21 I'll answer it.

22 Q. Is there anything --

23 A. I know too much, I think.

24 Q. -- I haven't asked you about Sheik
25 Khalid that you believe you should have already

1 provided to me based upon the questions I asked?

2 A. No. I think, regarding Khalid Al
3 Thani, is basically it. Him being in Doha, him
4 being promised that he will go back to the US
5 driving his fancy cars.

6 Q. Does he like cars?

7 A. He?

8 Q. Mm-hm?

9 A. Yeah.

10 Q. Does he spend a lot of time and money
11 and effort in race cars or?

12 A. That's what I understood. Like, I
13 don't know the guy. I never met him or talked to
14 him. But it sounds like me that he's fanatic about
15 fancy cars.

16 Q. So would he be devastated if somebody
17 took those fancy cars from him?

18 A. No, he will replace them. They are
19 --

20 Q. More fancy cars?

21 A. Yes. He's not in jail. He's
22 probably going to vacation in Europe for this
23 summer. He's not going anywhere. They're not going
24 to hurt him or kill him. He's as crazy as the next
25 member of the ruling family there, so it's not a new

1 thing. It's just that there's a lawsuit. That's
2 it.

3 Q. Mm-hm?

4 A. Other members of the ruling family
5 have killed a lot of people. There are bodies of
6 Indian workers who work in palaces have been shipped
7 India, some of them with broken bones completely,
8 neck. No questions asked because they got killed in
9 the palace, so they killed him.

10 Q. What about Americans though?

11 A. They didn't mention any Americans.
12 They didn't.

13 Q. What about in America?

14 A. Well, that's what they said in
15 general. We're worried about the bodies he buried.
16 They didn't say only in Doha. So the way they said
17 it, it sounded like there are other countries, like
18 outside Qatar --

19 Q. Mm-hm?

20 A. -- he killed people, or had them
21 killed --

22 Q. Mm-hm?

23 A. -- and buried, and nobody knows about
24 them.

25 Q. And you believe, based on your

1 conversations, that Sheik Khalid has murdered people
2 in the United States?

3 A. Yes. Maybe not at his own hands but
4 at behest of his desire, yes.

5 Q. Has ordered them to be killed?

6 A. I would think so, yeah.

7 Q. And buried somewhere in the United
8 States?

9 A. Somewhere in the United States.
10 Maybe.

11 Q. Okay. All right. You have the
12 right -- I'm not going to say it "to remain silent"
13 so don't get nervous.

14 You have the right to read the final
15 transcript and make any changes that you have. You
16 would need to sign your name to those changes. And
17 I could object to those changes based upon your
18 reasons for the changes.

19 Would you like to review that final
20 transcript or do you waive your reading to the final
21 transcript that will be provided?

22 A. I will wait until the final
23 transcript provided.

24 Q. Okay. So you would like to review
25 it?

1 A. When it's completed, you mean?

2 Q. Yes?

3 A. To just review it or to obtain a
4 copy? I would like to obtain a copy.

5 Q. So you will absolutely have a copy.

6 A. Yeah.

7 Q. Absolutely.

8 A. Yes.

9 Q. What I'm asking you right now is,
10 would you like the opportunity to review the final
11 transcript and provide any edits such as: You
12 stated something and you realized it should have
13 been something different; you wish you had answered
14 differently?

15 You may do so and provide those edits, and
16 you would have to provide the reason why. I could
17 potentially challenge your reasons why.

18 A. Mm-hm.

19 Q. So you have the right to that before
20 it's finalized and sealed and done.

21 Or you can waive that and you can say
22 whatever you've stated here, right now, today, as
23 recorded, is your final version.

24 A. If it is matching exactly what has
25 been recorded and there are no spelling mistakes or

1 miswording of words, then I waive that with the
2 right of obtaining a copy of this whole thing.

3 Q. Yes. You will have a copy?

4 A. Everything I said here is 100 percent
5 solid as well as matches what I said on the video.

6 Q. Okay. All right. That concludes my
7 questions. Thank you.

8 A. You're welcome.

9 THE VIDEOGRAPHER: This marks the end of
10 Media 2 and today's proceedings in the
11 deposition of Alan Bender. We're going
12 off the record at 12:45 p.m.

13 --- Whereupon proceedings concluded at 12:45 p.m.

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REPORTER'S CERTIFICATE

I, KARIN A. JENKNER, RPR, CRR, CSR
(ONT.), Certified Shorthand Reporter, certify:

That the foregoing proceedings were
taken before me at the time and place therein set
forth, at which time the deponent was put under
oath by the videographer;

That the testimony of the deponent and
all objections made at the time of the examination
were recorded stenographically by me and were
thereafter transcribed;

That the foregoing is a true and correct
transcript of my shorthand notes so taken.

I further certify that I am not a
relative or employee of any attorney or of any of
the parties, nor financially interested in the
action.

I declare that the foregoing is true and
correct.

Dated this 23 day of October, 2019



Karin A. Jenkner, CRR, RPR, CSR (Ontario)

(My Commissioner of Oaths expires July 19, 2022)

INSTRUCTIONS TO WITNESS

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Read your deposition over carefully. It is your right to read your deposition and make changes in form or substance. You should assign a reason on the errata sheet in the appropriate column for any change made.

After making any changes in form or substance, and which have been noted on the following errata sheet, along with the reason for any change, sign your name on the errata sheet and date it.

Then sign your deposition at the end of your testimony in the space provided. You are signing it subject to the changes you have made in the errata sheet, which will be attached to the deposition before filing. You must sign it in front of a witness. The witness need not be a notary public. Any competent adult may witness your signature.

Return the original errata sheet to the examining attorney (attorney questioning) promptly. Court rules require filing within 30 days after you receive the deposition.

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SIGNATURE PAGE

OF

ALAN BENDER

I, THE UNDERSIGNED, declare:

That I have read the foregoing transcript,
and I have made any and all corrections, additions
or deletions that I was desirous of making;

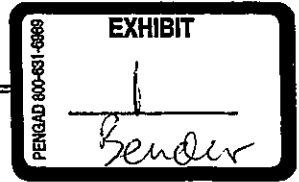
That the foregoing is a true and correct
transcript of my testimony contained therein.

SIGNATURE: _____

WITNESSED BY: _____

DATE: _____

Exhibit A



UNITED STATES DISTRICT COURT
for the
Middle District of Florida

MATTHEW PITTARD and MATTHEW ALLENDE

Plaintiff

v.

KH HOLDING, LLC, et al

Defendant

Civil Action No. 8:19-CV-1784

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

ALAN BENDER

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: 181 WELLINGTON STREET, WEST TORONTO, ONTARIO MV5 3G7
Date and Time: OCTOBER 2, 2019 at 9:00 A.M.

The deposition will be recorded by this method: AUDIOVISUAL

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached - Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: SEP 16 2019

CLERK OF COURT

Alexandro Castillo
Signature of Clerk or Deputy Clerk

OR

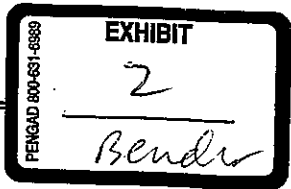
Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) PLAINTIFFS MATTHEW PITTARD AND MATTHEW ALLENDE

, who issues or requests this subpoena, are: REBECCA CASTANEDA, THE CASTANEDA LAW FIRM PLLC, 506 N. ARMENIA AVENUE, TAMPA, FLORIDA 33602; RC@ATTORNEYREBECCACASTANEDA.COM; (813) 708-8864

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).



UNITED STATES DISTRICT COURT

for the

Middle District of Florida

MATTHEW PITTARD and MATTHEW ALLENDE

Plaintiff

v.

KH HOLDING, LLC, et al

Defendant

Civil Action No. 8:19-CV-1784

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

MESHAL BIN HAMAD AL THANI

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action.

Table with 2 columns: Place (1331 PENNSYLVANIA AVENUE NW, WASHINGTON, DC 20004) and Date and Time (OCTOBER 10, 2019 at 9:30 A.M.)

The deposition will be recorded by this method: AUDIOVISUAL

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached - Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: SEP 16 2019

CLERK OF COURT

Signature of Clerk or Deputy Clerk (Alejandra Castillo)

OR

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) PLAINTIFFS MATTHEW PITTARD AND MATTHEW ALLENDE

REBECCA CASTANEDA, THE CASTANEDA LAW FIRM PLLC, 506 N. ARMENIA AVENUE, TAMPA, FLORIDA 33602; RC@ATTORNEYREBECCACASTANEDA.COM; (813) 708-8864

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UNITED STATES DISTRICT COURT

for the

Middle District of Florida

MATTHEW PITTARD and MATTHEW ALLENDE

Plaintiff

v.

KH HOLDING, LLC, et al

Defendant

Civil Action No. 8:19-CV-1784

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

ABDULLAH IBN HAMAD AL-ATHBAH

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Table with 2 columns: Place (1331 PENNSYLVANIA AVENUE NW WASHINGTON, DC 20004) and Date and Time (OCTOBER 9, 2019 at 9:30 A.M.)

The deposition will be recorded by this method: AUDIOVISUAL

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

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Date: SEP 16 2019

CLERK OF COURT

Alejandro Castillo

Signature of Clerk or Deputy Clerk

OR

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) PLAINTIFFS MATTHEW PITTARD AND MATTHEW ALLENDE, who issues or requests this subpoena, are:

REBECCA CASTANEDA, THE CASTANEDA LAW FIRM PLLC, 506 N. ARMENIA AVENUE, TAMPA, FLORIDA 33602; RC@ATTORNEYREBECCACASTANEDA.COM; (813) 708-8864

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

UNITED STATES DISTRICT COURT
for the
Middle District of Florida

MATTHEW PITTARD and MATTHEW ALLENDE

Plaintiff

v.

KH HOLDING, LLC, et al

Defendant

Civil Action No. 8:19-CV-1784

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

MOHAMMED BIN AHMED AL-MASNAD

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: 1331 PENNSYLVANIA AVENUE NW WASHINGTON, DC 20004 Date and Time: OCTOBER 8, 2019 at 9:30 A.M.

The deposition will be recorded by this method: AUDIOVISUAL

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached - Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: SEP 16 2019

CLERK OF COURT

Signature of Clerk or Deputy Clerk

OR

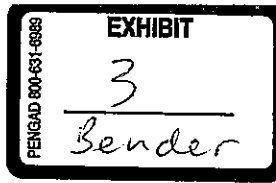
Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) PLAINTIFFS MATTHEW PITTARD AND MATTHEW ALLENDE

, who issues or requests this subpoena, are: REBECCA CASTANEDA, THE CASTANEDA LAW FIRM PLLC, 506 N. ARMENIA AVENUE, TAMPA, FLORIDA 33602; RC@ATTORNEYREBECCACASTANEDA.COM; (813) 708-8864

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).



September 18, 2019

CERTIFIED MAIL / RETURN RECEIPT REQUESTED

Rebecca Castaneda, Esquire
Castaneda Law Firm PLLC
506 N. Armenia Avenue
Tampa, FL 33602

Re: Matthew Pittard and Matthew Allende v. KH Holding, LLC, et al.

Dear Ms. Castaneda:

In connection with my representation of the Embassy of the State of Qatar in Washington, I am returning three deposition subpoenas, and witness fees, delivered via FedEx and by hand to the Embassy premises.

Among other defects, none of the subpoenas was served on the "named person" as required by Fed. R. Civ. P. 45(b). The Embassy premises are inviolable under the Vienna Convention on Diplomatic Relations, 1961 (Art. 22), and service is therefore ineffective. To the extent that the three named non-party witnesses are recognized, none is subject to the jurisdiction of the Court. One is the serving Ambassador of the State of Qatar, also inviolable under the Vienna Convention, and expressly not obliged to give evidence as a witness (Art. 29-31). The others are citizens of a foreign state, who do not reside or regularly transact business in the United States. Further, as to those persons, the subpoenas purport to require compliance beyond the geographical limits stated in Fed. R. Civ. P. 45(c).

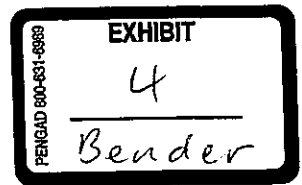
Sincerely,



Squire Patton Boggs (US) LLP

Dean M. Dilley

Enclosures



UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

MATTHEW PITTARD; and
MATTHEW ALLENDE,

Case No.: 8:19-CV-1784

Plaintiffs,

COMPLAINT AND
DEMAND FOR JURY TRIAL

v.

H.E. SHEIK KHALID BIN HAMAD BIN KHALIFA AL THANI;
GEO STRATEGIC DEFENSE SOLUTIONS, LLC; and
KH HOLDING, LLC,

Defendants.

NATURE OF THE ACTION

1. Plaintiffs Matthew Pittard and Matthew Allende, ("Plaintiffs"), bring this action under the Fair Labor Standards Act ("FLSA"), 29 U.S.C. §§ 201 *et. seq.*, in order to remedy Defendants wrongful withholding of Plaintiffs' earned wages and overtime compensation, and intentional unfair and/or deceptive acts. Plaintiffs also bring these claims under Florida Labor Law ("FLL"), Florida Constitution, Article 10, §§ 24 *et. seq.*, and Florida Statute Title 31 §§ 448 *et. seq.*, and the California Code, Labor Code ("CLC") LAB §§ 1182, 1194 *et. seq.* as well as the supporting Florida and California State Department of Labor Regulations for violations of overtime wage requirements, and notice and record-keeping requirements.

2. Additionally, Plaintiff Matthew Allende brings a claim of retaliation under the FLSA, and a claim of personal injury under California law.
3. Finally, Plaintiff Matthew Pittard brings a claim of retaliation and claims of misuse of business information and tortious interference of a contract and business relationship under FLL and Florida law.
4. Defendants engaged in unlawful conduct pursuant to a policy of minimizing labor costs and denying employees compensation by knowingly violating the FLSA, FLL, and CLC. Defendants caused personal injury and later retaliated against Plaintiffs, terminating them from employment and intentionally interfering in a business relationship and damaging a contractual agreement between Plaintiff Pittard and others.

JURISDICTION AND VENUE

Federal Question Jurisdiction and Supplemental Jurisdiction

5. This Court has original subject matter jurisdiction over this action under 28 U.S.C. § 1331 because the civil action herein arises under the laws of the United States, namely, the Fair Labor Standards Act and 29 U.S.C. §§ 201 *et seq.* Additionally, this Court has supplemental jurisdiction over Plaintiffs' state law claims under 28 U.S.C. §1367(a).

Personal Jurisdiction

6. This Court may properly maintain personal jurisdiction over Defendants under Rule 4 of the Federal Rules of Civil Procedure as Defendants' contacts with this state and this judicial district are sufficient for exercise of jurisdiction over Defendant so as to comply with traditional notions of fair play and substantial justice.

Venue

7. Venue is proper in the Middle District of Florida under 28 U.S.C. §§ 1391 (b) (3) and (c)(2) and (c)(3).

THE PARTIES

Plaintiffs:

8. Plaintiff Matthew Pittard ("Pittard") is an adult individual residing in the State of Florida, County of Pasco.

9. Plaintiff Matthew Allende ("Allende") is an adult individual residing in the State of California, County of Los Angeles.

10. During the relevant time period, Plaintiffs were covered employees within the meaning of the FLSA, 29 U.S.C. § 203(e), FLL § 448.101, and the CLC § 1194, employed by Defendants, H.E. Sheikh Khalid bin Hamad bin Khalifa Al Thani, Geo Strategic Defense Solutions, LLC and KH Holding, LLC ("Defendants").

11. Plaintiffs were employees engaged in commerce since a substantial part of their job requirements was to accompany Defendant Khalid in the United States and to foreign countries in order to perform their job functions.

12. Plaintiffs consented in writing to be parties to the FLSA claims in this action, pursuant to 29 U.S.C. §216(b), and their consent forms are attached hereto.

13. During the relevant time period, Plaintiff Pittard was a party, person, and/or business entity engaged in commerce within the meaning of FL Stat. § 501.204.

Defendant:

14. H.E. Sheikh Khalid bin Hamad bin Khalifa Al Thani, ("Khalid"), Geo Strategic Defense Solutions, LLC, and KH Holding, LLC, were Plaintiffs' employer and employed Plaintiffs individually and/or jointly.

15. At all relevant times throughout Plaintiffs' employment, Defendant Khalid had the discretionary power to create and enforce personnel decisions including but not limited to: hiring and terminating employees; setting and authorizing issuance of wages; maintaining employee records; setting employees' schedules; instructing, supervising and training employees; dictated physical movement of

employees; and otherwise controlled the terms and conditions of employment of the Plaintiffs.

16. Upon information and belief, Defendant Khalid is the chairman, owner, and operator of Geo Strategic Defense Solutions, LLC and KH Holding, LLC. Defendant Khalid set and/or approved all the unlawful practices complained of herein in his individual capacity and/or through his companies Geo Strategic Defense Solutions, LLC, and KH Holding, LLC.

17. Defendants are a “covered employer” within the meaning of the FLSA, 29 U.S.C. § 203(d), FLL § 448.101, and the CLC § 18, and are therefore liable for the unpaid wages and other damages sought herein.

FACTUAL ALLEGATIONS

Plaintiffs' Work for Defendant

18. Plaintiffs were formerly employed by Defendants to perform work in the United States, Qatar, and any location to which Defendant Khalid chose to travel.

19. As part of their duties, Plaintiffs were required to accompany Defendant Khalid as he traveled to, from, and in the United States, Qatar, and London, England, where they were subject to long working hours, ranging from sixty (60) to ninety-six (96) hours per week. The work hours were dictated by Defendant Khalid's requirement of constant medical care and security supervision.

20. Plaintiff Pittard entered into an employment agreement whereby Defendants requested Pittard be on duty for five days with two days off. Pittard's employment agreement included, in addition to monthly compensation, thirty days of paid leave per calendar year, two yearly flight allowances, transportation, and accommodations. Pittard's employment contract expressly states that local labor laws are not applicable.

21. Plaintiff Allende entered into an employment agreement whereby Defendants requested Allende be on duty 24/7 with days off only when Allende requested time off directly from Defendant Khalid.

22. These illegal agreements were crafted solely by Defendant Khalid and Plaintiffs were required to accept their terms, or else forfeit their jobs.

23. Throughout the duration of their employment, Plaintiffs did not have any supervisory authority nor did they exercise discretion or independent judgment with respect to matters of significance.

24. Throughout the course of their employment, Plaintiffs consistently worked in excess of forty (40) hours per week but were not paid overtime.

25. Plaintiff Pittard was employed by Defendant from September 17, 2017 to July 10, 2018. Pittard was employed as the Defendants' United States Director of Security and as a Senior Defense Consultant in Doha, Qatar.

26. Pittard was promised an annual salary of \$102,000.00 plus an end-of-the-year bonus in exchange for working regular 40-hour weeks.

27. Pittard's job duties included ensuring the safety and security of Defendant Khalid and his family while in the United States and instituting security protocols and procedures to advance the security initiatives of Defendant Khalid and his family. While in Doha, Pittard conducted advanced counter-assault training, and provided law enforcement instruction and weapons training.

28. During the period of his employment with Defendants, Pittard worked approximately 80 hours per week when Defendant was located in the United States. When Defendant was in Qatar and traveling, Pittard's work hours varied from 60 to 70 hours per week, he was not permitted any time off and was on call 24/7 to immediately respond to Defendant's needs and requests.

29. During his employment, Pittard was solicited by Defendant Khalid for the murder of two individuals. In approximately late September of 2017 and November of 2017, in Los Angeles, California, Defendant Khalid asked Pittard to murder a male and a female who Defendant Khalid viewed as threats to his social reputation and personal security. Pittard refused to execute these unlawful requests.

30. During Pittard's period of employment, from approximately July 7-10, 2018, Defendant Khalid and his private Qatari security staff held an American

citizen against the American citizen's will on at least two occasions in one of Defendant Khalid's personal residences. At Defendant Khalid's request, the American citizen was arrested and jailed at the Onaiza Police Station in Doha, Qatar. Pittard and the United States Embassy came to the aide of the American citizen, and helped the American citizen reach a point of safety, and eventually safely depart from the country of Qatar.

31. On July 7, 2018, Defendant Khalid learned that the American citizen was no longer in his personal residence, and upon learning that Pittard had assisted in securing the American citizen's safety, began contacting Pittard. Defendant Khalid, and individuals at the direction of Defendant Khalid, including employees of Defendant Geo Strategic Defense Solutions, LLC and Defendant KH Holding, LLC, demanded that Pittard return the American citizen, and provide information about the American citizen's whereabouts to Defendant Khalid or Pittard "would pay the price." Defendant Khalid's threats to, and requests of, Pittard continued to escalate; Defendant Khalid directly told Pittard that he would kill him, bury his body in the desert, and kill Pittard's family.

32. On July 10, 2018, Pittard was held against his will by Defendant Khalid, family members of Defendant Khalid, by Defendant's private Qatari security staff, and by employees of Defendant Geo Strategic Defense Solutions, LLC and Defendant KH Holding, LLC. Pittard was threatened with bodily harm and his

work equipment, electronics, personal belongings, and medication were stolen and/or destroyed, and Pittard was terminated from Defendants' employment. Pittard was forced under duress, with Defendant Khalid brandishing a Glock 26 firearm, which he tapped repeatedly during his exchange with Pittard, to execute new employment documents.

33. Throughout his employment with Defendants, Pittard was not timely compensated for his hours worked nor was he compensated at all for his overtime hours.

34. Pittard never received wage statements or any other type of records outlining the number of hours he worked for the Defendants and the amounts owed to him.

35. In addition, Pittard sustained economic and non-economic damages as a result of Defendants' termination.

36. Additionally, Pittard also sustained economic and non-economic damages as a result of retaliation by Defendants. After Defendants' termination of Pittard, Defendants misused Pittard's business information. For example, Defendants interfered with a Qatar security, law enforcement, and arms brokerage contract that Pittard had negotiated with the Police Training Institute in Doha, Qatar.

37. Plaintiff Matthew Allende was employed as a paramedic by Defendants from approximately October 15, 2017, to February 4, 2018.

38. Allende began his employment with Defendants in Los Angeles, California.

39. Allende worked for Defendants when Defendant Khalid was in the United States as well as at one of Defendant's personal residences, the Majhils, in Doha, Qatar.

40. As part of his employment duties, Allende provided immediate emergency medical care, vital sign monitoring, and mobile medical emergency services.

41. Allende was required to frequently travel with Defendant Khalid and Defendant Khalid's family for work and personal purposes.

42. On approximately December 5, 2017, Allende accompanied Defendant Khalid to Doha, Qatar.

43. Allende was compensated at a rate of \$500 USD per day, with a salary range of \$14,000-\$15,500 USD per month.

44. While working for Defendants, Allende worked seven days per week, approximately 12 hours per day, with minimal meal breaks. There were periods of time, particularly at the beginning of his employment, where Allende worked for 20 to 36 hours straight, with minimal meal breaks and no opportunity for sleep. His exact schedule varied from day to day to meet the medical needs of Defendant Khalid.

45. When Allende was requested to accompany Defendant Khalid on trips or vacations, he was required to work seven days per week and 12 or more hours per day. This is because he was required to be on duty to monitor Defendant Khalid's vital signs and administer aid as needed.

46. Accordingly, Allende worked approximately 84 hours per week, exclusive of the numerous occasions where he worked for 20 to 36 hours straight.

47. Over the course of his employment, on several occasions Defendant Khalid refused Allende's request to leave the Majlis for normal breaks, personal needs, and personal respite after Allende had completed his requested shift. On or about December 17, 2017, after approximately three straight weeks of work and a 36-hour sleepless binge by Defendant Khalid, Allende requested a day off, to which Defendant Khalid agreed. During this 36-hour sleepless binge, Allende was forced to stay awake with Defendant Khalid. As Allende was leaving the Majlis, Allende was stopped by Defendant Khalid's assigned security Amiri Guard at the entrance/exit of the Majlis. Allende was told that, at the direction of Defendant Khalid, he was not allowed to leave the Majlis. Allende stated that he had asked for a day off from Defendant Khalid, and that Defendant Khalid had granted his request.

48. Defendant Khalid's guard, armed with a pistol, stated that Defendant Khalid had changed his mind and that Allende was no longer able to leave the

premises. Allende informed the guard he was leaving with or without the guard's permission, to which the guard replied "No, you are not leaving," and directed Allende to immediately return to the Majlis.

49. Instead of returning to Majlis, and fearing for his life, Allende escaped the confines of the premises of Majlis by jumping over a five-foot rod-iron fence, and then using a security guard dog's kennel to scale over an eighteen-foot perimeter wall. Allende, knowing the risk that he may sustain serious injuries in his efforts to maintain personal security and safety, and escape from the dangerous and threatening situation created by Defendant Khalid, jumped from the top of the Majlis perimeter wall to the concrete walkway, and fell approximately eighteen feet.

50. Allende sustained serious injuries and required immediate medical attention and surgery in Doha, Qatar. Thereafter, on or about February 4, 2018, once he was healthy enough to travel, though still on crutches, Allende was terminated from employment by Defendants.

51. Throughout his employment with Defendants, Allende received a flat daily rate and was not compensated at all for his overtime hours of work.

52. Allende never received paystubs from Defendants outlining the number of hours worked and his rate of pay.

Defendants' Unlawful Practices

53. Defendants repeatedly suffered or permitted Plaintiffs to work in excess of forty (40) hours per week without paying them the appropriate overtime pay.

54. Defendants willfully disregarded and purposefully evaded recordkeeping requirements of the FLSA, FLL, and CLC by failing to maintain accurate and complete timesheets and payroll records. Defendants did not implement any procedure to keep track of Plaintiffs' hours of work or the hours of work.

55. Plaintiffs were never provided with wage statements showing the number of hours worked for Defendants in any given week of their employment.

56. Plaintiffs were not provided with proper wage notices at the time of hire or at any time thereafter.

57. While Defendants employed Plaintiffs, they failed to post notices explaining the minimum and overtime wage rights of employees under the FLSA, FLL, and CLC and failed to inform Plaintiffs of such rights.

58. At all relevant times, Defendants were an employer of Plaintiffs within the meaning of the FLSA, FLL, and CLC.

59. Defendants' actions, threats, and requests during and after Plaintiffs employment has created an environment of fear and intimidation. Defendants behavior has gone beyond a term of employment and intentionally extended into Plaintiff Pittard's business and Plaintiffs' personal and professional lives.

Defendants' access through his/their financial resources essentially prescribe limitless opportunity for harm.

FIRST CAUSE OF ACTION

Fair Labor Standards Act – Unpaid Overtime Wages

60. Plaintiffs reallege and incorporate by reference all allegations made in all preceding paragraphs.

61. Defendants failed to pay Plaintiffs overtime wages for all hours worked above 40 hours per week thereby violating the FLSA, 29 U.S.C. § 207(a)(1).

62. Defendants' unlawful conduct, as described in this Complaint, was willful and intentional. Defendants were aware, or should have been aware, that the practices described in this Complaint were unlawful. Accordingly, a three-year statute of limitations applies pursuant to 29 U.S.C. § 255(a).

63. As a result of the Defendants' violations of the FLSA, Plaintiffs have been deprived of overtime compensation and other wages in amounts to be determined at trial, and are thus entitled to recovery of such amounts, liquidated damages, attorney's fees and costs, and other compensation pursuant to 29 U.S.C. § 216(b).

SECOND CAUSE OF ACTION

Florida Labor Law – Unpaid Overtime Wages

(Brought on behalf of Plaintiff Pittard only)

64. Plaintiff Pittard realleges and incorporates by reference all allegations in all preceding paragraphs.

65. Defendants failed to pay Pittard overtime wages for all hours worked above 10 hours per day, thereby violating FLL § 448.01.

66. Due to Defendants' violations of the FLL, Plaintiff Pittard is entitled to recovery of his unpaid overtime wages, and reasonable attorney's fees, pursuant to FLL §§ 448.104.

THIRD CAUSE OF ACTION

California Labor Law – Unpaid Overtime Wages

(Brought on behalf of Plaintiff Allende only)

67. Plaintiff Allende realleges and incorporates by reference all allegations in all preceding paragraphs.

68. Defendants failed to pay Allende overtime wages for all hours worked in excess of eight hours in one workday and work above 40 hours per week, thereby violating CLC § 510.

69. Defendants' failure to pay Allende his overtime compensation lacked a good faith basis within meaning of CLC § 13520.

70. Due to Defendants' violations of the CLC, Allende is entitled to recovery of his unpaid overtime wages, reasonable attorney's fees and costs of the action, and pre-judgment and post-judgment interest, pursuant to CLC § 1194.

FOURTH CAUSE OF ACTION

Fair Labor Standards Act – Prohibited Retaliation

(Brought on behalf of Plaintiff Allende only)

71. Plaintiff Allende realleges and incorporates by reference all allegations in all preceding paragraphs.

72. Defendants retaliated against Allende by terminating his employment after Allende requested and was granted and then denied respite from work, and attempted to depart Defendant Khalid's personal residence after three straight weeks of work, and a 36-hour shift, in violation of 29 U.S.C.A. § 215(a)(3).

73. Due to Defendants' unlawful retaliation against Allende, he has suffered harm and is entitled to recovery of back wages, front wages, liquidated damages, damages for emotional distress, punitive damages, attorney's fees, costs, and other such damages of an amount to be determined at trial.

FIFTH CAUSE OF ACTION

California Labor Code – Prohibited Retaliation

(Brought on behalf of Plaintiff Allende only)

74. Plaintiff Allende realleges and incorporates by reference all allegations in all preceding paragraphs.

75. Defendants retaliated against Allende by terminating his employment after Allende requested and was granted respite from work, and attempted to depart Defendant Khalid's personal residence after three straight weeks of work, and a 36-hour shift, in violation of CLC § 1102.5.

76. Due to Defendants' unlawful retaliation against Allende, he has suffered harm and is entitled to recovery of back wages, front wages, liquidated damages, damages for emotional distress, punitive damages, attorney's fees, costs, and other such damages of an amount to be determined at trial.

SIXTH CAUSE OF ACTION

California Labor Code– Failure to Provide Wage Statements

(Brought on behalf of Plaintiff Allende only)

77. Plaintiff Allende realleges and incorporates by reference all allegations in all preceding paragraphs.

78. Defendants failed to provide Allende with wage statements listing the number of hours he worked each week of his employment with Defendants, and the rate received for such hours, in violation of CLC § 226.

79. Due to Defendants' violations of the CLC, Allende is entitled to recover from Defendants statutory damages of Fifty Dollars (\$50) for the initial pay period violation and One Hundred Dollars (\$100) for each violation in a subsequent pay period, up to a maximum of Four Thousand Dollars (\$4,000), reasonable attorney's fees and costs of the action, pursuant to CLC § 226.

SEVENTH CAUSE OF ACTION

Florida Law-- Prohibited Retaliation

(Brought on behalf of Plaintiff Pittard only)

80. Plaintiff Pittard realleges and incorporates by reference all allegations in all preceding paragraphs.

81. Defendants retaliated against Plaintiff Pittard by wrongfully terminating his employment after Pittard refused to engage in criminal activity in violation of public policy at the request of Defendant Khalid.

82. Due to Defendants' unlawful retaliation against Pittard, he has suffered great hardship and is entitled to recovery of back wages, front wages, liquidated damages, damages for emotional distress, punitive damages, attorney's fees, costs, and other such damages of an amount to be determined at trial.

EIGHTH CAUSE OF ACTION

Florida Deceptive and Unfair Trade Practices Act –

Tortious Interference with Business Contract

(Brought on behalf of Plaintiff Pittard only)

83. Plaintiff Pittard realleges and incorporates by reference all allegations in all preceding paragraphs.

84. Defendants retaliated against Pittard by misusing his business information. For example, Defendants intentionally interfered and disrupted a contract between Plaintiff and the Police Training Institute, in violation of FL Stat § 501.204. Defendants knew of the contract, and intentionally acted to disrupt the contract to harm Plaintiff.

85. Due to Defendants' tortious interference, Pittard is entitled to loss of business and profit, attorney's fees, costs, and other such damages of an amount to be determined at trial.

NINTH CAUSE OF ACTION

Florida Deceptive and Unfair Trade Practices Act –

Tortious Interference with Business Relationship

(Brought on behalf of Plaintiff Pittard only)

86. Plaintiff Pittard realleges and incorporates by reference all allegations in all preceding paragraphs.

87. Defendants retaliated against Pittard by intentionally interfering and disrupting a business relationship with the Police Training Institute, in violation of FL Stat § 501.204. Defendant knew of the relationship, and intentionally acted to disrupt the relationship to harm Plaintiff.

88. Due to Defendants' tortious interference, Pittard is entitled to loss of business and profit, attorney's fees, costs, and other such damages of an amount to be determined at trial.

TENTH CAUSE OF ACTION

California Law – Personal Injury

(Brought on behalf of Plaintiff Allende only)

89. Plaintiff Allende realleges and incorporates by reference all allegations in all preceding paragraphs.

90. As a direct and proximate result of Defendants' actions, Allende suffered severe and permanent physical injuries.

91. Due to Defendants' acts and omissions, Allende has suffered general and special, incidental and consequential damages. These damages include, but are not limited to: damages for general pain and suffering; permanent physical injury; damages for loss of enjoyment of life, both past and future; travel and travel-related expenses, past and future; emotional distress, and future emotional distress; pharmaceutical expenses, past and future; related wage and loss earning

capacity damages; and, all other ordinary, incidental and consequential damages as would be anticipated to arise under the circumstances.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs seek the following relief:

A. Issuance of a declaratory judgment that the practices and actions complained of in this complaint are unlawful under the Fair Labor Standards Act, 29 U.S.C. §§ 201 *et seq.*, Florida Labor Law ("FLL"), Florida Constitution, Article 10, §§ 24 *et. seq.*, Florida Statute Title 31 §§ 448 *et. seq.*, the Florida Deceptive and Unfair Trade Practices Act, FL Statute 501.201, and the California Labor Code ("CLC"), LAB §§ 1182, 1194 *et. seq.*, as well as the supporting Florida and California State Department of Labor Regulations;

B. Unpaid overtime wages under the FLSA and an additional and equal amount as liquidated damages pursuant to 29 U.S.C. § 216(b) and the supporting United States Department of Labor regulations;

C. Unpaid overtime wages under the FLL, and attorney's fees pursuant to FLL §§448.104;

D. Unpaid overtime wages under the CLC, reasonable attorney's fees and costs of this action, and pre-judgment and post-judgment interest, pursuant to CLC § 1194;

E. Civil penalties of One Thousand One Hundred Dollars (\$1,100.00) for each of Defendants' willful and repeated violations of the FLSA pursuant to 29 U.S.C. § 216(b);

F. If liquidated damages pursuant to FLSA, 29 U.S.C. § 216(b) are not awarded, an award of pre-judgment interest pursuant to 28 U.S.C. § 1961;

G. An award of back wages, front wages, damages for emotional distress, and punitive damages, attorney's fees, costs, and other such damages as appropriate for Defendants' prohibited retaliation against Allende pursuant to California law;

H. An award of back wages, front wages, liquidated damages, damages for emotional distress, punitive damages, and liquidated damages up to a maximum of Ten Thousand Dollars (\$10,000), for Defendants' prohibited retaliation against Allende pursuant to CLC § 1102.5;

I. An award of statutory damages up to a maximum of Four Thousand Dollars (\$4,000), for Defendants' failure to provide Plaintiff Allende with accurate wage statements pursuant to CLC § 226;

J. An award of back wages, front wages, damages for emotional distress, punitive damages, attorney's fees, costs, and other such damages as appropriate for the Defendants' prohibited retaliation against Plaintiff Pittard pursuant to Florida law;

K. An award of loss of business and profit, attorney's fees, costs, and other such damages as appropriate for the Defendants' intentional interference and

disruption of a contract between Plaintiff Pittard and the Police Training Institute, and other such damages as appropriate for the Defendants' acts and misuse of Pittard's business information;

L. An award of loss of business and profit, attorney's fees, costs, and other such damages as appropriate for the Defendants' intentional interference and disruption of a business relationship, and other such damages as appropriate for the Defendants' acts;

M. An award of damages for general pain and suffering; permanent physical injury; damages for loss of enjoyment of life, both past and future; travel and travel-related expenses, past and future; emotional distress, and future emotional distress; pharmaceutical expenses, past and future; related wage and loss earning capacity damages; and, all other ordinary, incidental and consequential damages as would be anticipated to arise under the circumstances for Defendants' conduct that directly and proximately caused physical injury to Plaintiff Allende;

N. As to Plaintiff Pittard, an award of pre-judgment and post-judgment interest of four-point five percent per annum (4.5%) pursuant to FL Stat. § 55.03;

O. As to Plaintiff Allende, an award of pre-judgment and post-judgment interest of seven percent per annum (7.0%) pursuant to CA Const. Art. 15 § 1;

P. Such other relief as this Court shall deem just and proper.

Respectfully submitted,

/s/Rebecca L. Castaneda

Rebecca L. Castaneda

Florida Bar No. 1007926

The Castaneda Law Firm

506 N. Armenia Avenue

Tampa, Florida 33609-1703

(813) 708-8864

rc@attorneyrebeccacastaneda.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been electronically filed on July 23, 2019, with the Clerk of the Court using the CM/ECF system which will automatically transmit an electronic copy to:

Attorney Aryeh Kaplan

Respectfully submitted,

/s/Rebecca L. Castaneda

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