

EXHIBIT “11”

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 13-20610-CIV-ALTONAGA/Simonton

LARRY E. KLAYMAN,

Plaintiff,

v.

JUDICIAL WATCH, INC., *et al.*,

Defendants.

_____ /

DECLARATION UNDER PENALTY OF PERJURY OF PAUL J. ORFANEDES

CITY OF WASHINGTON)
)
DISTRICT OF COLUMBIA)

PAUL J. ORFANEDES, pursuant to 28 U.S.C. §1746, makes the following declaration under the penalty of perjury:

1. I am over the age of eighteen (18) and I am capable of making this affidavit.
2. I have personal knowledge of the following facts and, if called upon as a witness, could testify competently thereto.
3. I am a resident of the Commonwealth of Virginia.
4. I am the Director of Litigation for Judicial Watch, Inc., a not-for-profit, tax-exempt, public interest organization formed under the laws of the District of Columbia and having its headquarters in the District of Columbia. I also am the Secretary and Treasurer and a member of Judicial Watch, Inc.'s Board of Directors.

5. It is my understanding that Larry Klayman has sued me, Judicial Watch, Inc., and other Judicial Watch, Inc. employees alleging that we, on or about February 22, 2012, “negligently, maliciously and/or willfully published and furthered the publication of a false statement that Plaintiff Klayman had been ‘convicted’ of a crime for not paying a large amount of child support with regard to his children, on the internet and elsewhere within this judicial district, Florida, and elsewhere throughout the United States and the world.”

6. I deny Klayman’s claims and I deny that I am liable on Klayman’s claims for defamation, defamation by implication, tortious interference with a contract, and intentional infliction of emotional distress.

7. I have never published, stated or implied that Larry Klayman had been convicted of a crime of not paying a large amount of child support, and I never directed, instructed, encouraged, or authorized any person to publish, state or imply that Larry Klayman had been convicted of a crime of not paying a large amount of child support. If such a statement was made, it was made without my knowledge, and therefore, I did not intend, and could not have intended, to cause any harm to Larry Klayman through such a statement.

8. Judicial Watch, Inc. has two employees and a small office in Miami, Florida. As part of my duties and responsibilities at Judicial Watch, Inc., I occasionally communicate with one of these employees, Irene Garcia, by telephone and by email. I have not communicated with Ms. Garcia about the alleged February 22, 2012 statement.

9. I do not: (1) own or lease any real property in Florida; (2) have a telephone listing or mailing address in Florida; (3) have any Florida bank accounts; (4) have any Florida property tax liability; (5) have any Florida registered vehicles or a Florida driver's license; (6) hold any Florida

professional licenses; (7) vote in Florida; (8) operate, conduct, engage in, or carry on any personal business in Florida; (9) travel to Florida except occasionally to visit family or conduct business on behalf of Judicial Watch, Inc.; (10) contract to insure any person or thing in Florida; (11) commit tortious acts in Florida; (12) cause injury to people or property in Florida; or (13) enter into or breach contracts that are to be performed in Florida.

10. The last time I recall traveling to the State of Florida was in May 2012 to attend a family member's graduation ceremony. In approximately March 2011, I spent approximately 10 days in Florida, again for family reasons. During that same March 2011 trip, I had occasion to attend two or three meetings on behalf of Judicial Watch. Prior to that, the last time I recall conducting any business on behalf of Judicial Watch, Inc. in Florida was in approximately January 2005. I also recall traveling to the State of Florida once in 2006 and once in 2007 for personal vacations.

FURTHER DECLARANT SAYETH NAUGHT.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 26, 2013 in Washington, D.C.


PAUL J. ORFANEDES