

EXHIBIT “9”

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

VINCENT FORRAS, *et al.*,

Plaintiffs,

v.

IMAM FEISAL ABDUL RAUF, *et al.*,

Defendants.

Case No. 1:12-cv-00282-RWR
Judge Richard W. Roberts

**AFFIDAVIT OF LARRY KLAYMAN IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO DEFENDANTS'
MOTION TO DISMISS AND FOR ATTORNEYS FEES**

My name is Larry Klayman and I am the Plaintiff in this case. I am a citizen over 18 years of age and conduct business within the District of Columbia, and hereby swear, to the best of my knowledge and belief, as follows:

1. I am providing this Affidavit in support of my opposition to Defendants' Motion to Dismiss and Attorneys' Fees.
2. I make this Affidavit based on my personal knowledge, documents in my office files, and documents filed of record with the courts of record.
3. I make this Affidavit for the purpose of annexing exhibits and documenting facts referred to in the Plaintiffs' Motion in Opposition to Defendants' Motion to Dismiss.
4. I am an American citizen of Jewish origin, and I have, at all material times, done business at 2020 Pennsylvania Ave., N.W. Suite 345, Washington, D.C. 20006 as the Chairman and General Counsel of Freedom Watch. I resided in the District of Columbia for over twenty (20) years and am a member of the District of Columbia bar.
5. I represented Plaintiff Vincent Forras ("Plaintiffs") as counsel in *Forras, et al. v. Rauf, et.*

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al. (Index No. 111970/2010), an action focusing predominantly on the nuisance caused by Defendant Rauf's continued effort to build a mosque near Ground Zero.

6. Subsequently, Defendant Rauf and his attorney, Defendant Adam Leitman Bailey, affirmatively gave their court pleadings to the New York Post, which then published an article in both its internet and print editions on October 12, 2010 branding Plaintiffs as anti-Muslim "bigots." A true and correct copy of the New York Post Article, Anti-Mosque Lawsuit Slammed As Bigotry is attached hereto as Exhibit "1".
7. As a result of these publicized statements contained in the pleadings and N.Y. Post article which are set forth in Plaintiffs' Opposition to Defendants' Motion to Dismiss and for Attorneys' Fees, Defendants had put a *de facto* Fatwah out on Plaintiff Vincent Forras and me. In fact, Mr. Forras and I received death threats because of Defendants' publication of their defamatory statements.
8. During an interview with CNN's Soledad O'Brien, Defendant Rauf threatened that preventing him from building a mosque in the Ground Zero area would cause a national security problem for the United States and new terrorism at Ground Zero because "the headlines in the Muslim world will be that Islam is under attack...(there's) the danger of the radicals in the Muslim world to our national security, to the national security of our troops." In the same interview, Defendant Rauf further threatened that if he does not build the mosque on Ground Zero, "it will strengthen the argument of the radicals to recruit, their ability to recruit, and their aggression and violence..."
9. A true and correct copy of the transcript of the CNN interview with Defendant Rauf and is attached hereto as Exhibit "2".
10. Defendants have intentionally sought to build a mosque near Ground Zero that, not

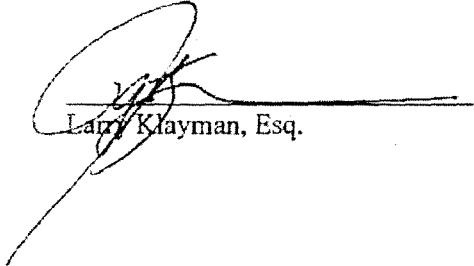
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coincidentally, has ties with the Islamic Center of North America, a well-known terrorist organization, as well as the Muslim Brotherhood, and other terror groups.

11. A true and correct copy of the Fox News article *Ground Zero Mosque Investor Contributed to Designated Terror Group*, Fox News (Sept.3, 2010), is attached hereto as Exhibit "3".
12. Moreover, it has recently been reported that Defendant Rauf used the building of the Mosque near Ground Zero as a means to defraud donors of his non-profit organizations, which allegedly aimed to "combat anti-Muslim sentiment," of millions of dollars.
13. A true and correct copy of the article by Sharon Otterman, *Donor, Citing Fraud, Sues Imam Tied to Mosque Near Ground Zero*, N.Y. Times (Feb. 5, 2013), is attached hereto as Exhibit "4".
14. In Defendant Bailey's Declaration, he even misrepresents to the court under oath that the New York Dismissal Order has never been appealed. However, a Notice of Appeal was filed on December 26, 2012. A true and correct copy of the Notice of Appeal is attached hereto as Exhibit "5".

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

Dated: June 3, 2013


Larry Klayman, Esq.