

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE: TERRORIST ATTACKS ON SEPTEMBER 11, 2001	) ) ) ) )	<b>Civil Action No. 03 MDL 1570 (GBD) (SN) ECF Case</b>
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This document relates to:

- Federal Insurance Co., et al. v. al Qaida, et al.*, No. 03-cv-6978
- Vigilant Insurance Co., et al. v. Kingdom of Saudi Arabia, et al.*, No. 03-cv-8591
- Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, No. 03-cv-9849
- Estate of John P. O'Neill, Sr., et al. v. Kingdom of Saudi Arabia, et al.*, No. 04-cv-1922
- Continental Casualty Co., et al. v. Al Qaeda, et al.*, No. 04-cv-5970
- Cantor Fitzgerald Assocs., et al. v. Akida Inv. Co., et al.*, No. 04-cv-7065
- Pacific Employers Insurance Co., et al. v. Kingdom of Saudi Arabia, et al.*, No. 04-cv-7216
- Euro Brokers Inc., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, No. 04-cv-7279
- Beazley Furlonge Ltd. v. Saudi Binladin Group, Inc., et al.*, No. 16-cv-7456
- Bowrosen, et al. v. Kingdom of Saudi Arabia*, No. 16-cv-8070
- McCarthy, et al. v. Kingdom of Saudi Arabia*, No. 16-cv-8884
- Aguilar, et al. v. Kingdom of Saudi Arabia, et al.*, No. 16-cv-9663
- Addesso, et al. v. Kingdom of Saudi Arabia, et al.*, No. 16-cv-9937
- Hodges, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-117
- DeSimone v. Kingdom of Saudi Arabia*, No. 17-cv-348
- Aiken, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-450
- Ashton, et al. v. Kingdom of Saudi Arabia*, No. 17-cv-2003
- The Underwriting Members of Lloyd's Syndicate 53, et al. v. Kingdom of Saudi Arabia, et al.*,  
No. 17-cv-2129
- The Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al.*, No. 17-cv-2651
- General Reinsurance Corp., et al. v. Kingdom of Saudi Arabia*, No. 17-cv-3810
- Abarca, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-3887
- Arrowood Indemnity Co. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-3908
- Abrams, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-4201
- Abtello, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-5174
- Aasheim, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-5471

**DECLARATION OF GREGORY G. RAPAWY  
IN SUPPORT OF THE RENEWED MOTION TO DISMISS  
OF THE KINGDOM OF SAUDI ARABIA**

I, Gregory G. Rapawy, make this declaration pursuant to 28 U.S.C. § 1746. I declare as follows:

1. I am an attorney with the law firm of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C. (“Kellogg Hansen”). I represent the Kingdom of Saudi Arabia in this litigation. I have been admitted to practice *pro hac vice* before this Court.

2. I make this Declaration in support of the Renewed Motion To Dismiss of the Kingdom of Saudi Arabia, which is being filed on August 1, 2017.

3. I have personal knowledge of the facts stated in this Declaration.

4. Exhibits 1 through 6 attached to this Declaration are all true and correct copies of publicly available documents that I or employees of Kellogg Hansen working under my supervision obtained from the sources set forth below on the date of this Declaration. Exhibit 7 is a true and correct copy of a discovery request served on the Kingdom of Saudi Arabia in this litigation.

5. Exhibit 1 is a report titled *The 9/11 Commission Report: The Final Report of the National Commission on Terrorist Attacks Upon the United States*, obtained from <https://govinfo.library.unt.edu/911/report/911Report.pdf>.\*

6. Exhibit 2 is a report titled *Monograph on Terrorist Financing: Staff Report to the Commission* (2004), obtained from [http://govinfo.library.unt.edu/911/staff\\_statements/911\\_TerrFin\\_Monograph.pdf](http://govinfo.library.unt.edu/911/staff_statements/911_TerrFin_Monograph.pdf).

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\* The original version of the document at the above link is a secure PDF with a digital certificate, which prevents alteration of the file. To permit filing via the Court’s ECF system, which requires that documents be in PDF/A format and be separated into parts no larger than four megabytes, Kellogg Hansen generated a non-secure version. No alterations were made to the content of the document. Should the Court or any counsel prefer to review the secure PDF, it is available at the above link.

7. Exhibit 3 is a statement titled National Commission on Terrorist Attacks Upon the United States, Outline of the 9/11 Plot, Staff Statement No. 16 (June 16, 2004), obtained from [http://govinfo.library.unt.edu/911/staff\\_statements/staff\\_statement\\_16.pdf](http://govinfo.library.unt.edu/911/staff_statements/staff_statement_16.pdf).

8. Exhibit 4 is a letter with enclosure, dated September 1, 2005, from Robert S. Mueller III and Porter J. Goss to the Honorable Pat Roberts, Chairman of the Senate Select Committee on Intelligence, obtained from [https://www.dni.gov/files/documents/Newsroom/Executive\\_Summary\\_of\\_Joint\\_FBI-CIA\\_Report\\_on\\_Extent\\_of\\_Saudi\\_Government\\_Support\\_for\\_Terrorism.pdf](https://www.dni.gov/files/documents/Newsroom/Executive_Summary_of_Joint_FBI-CIA_Report_on_Extent_of_Saudi_Government_Support_for_Terrorism.pdf).

9. Exhibit 5 is a report titled *The FBI: Protecting the Homeland in the 21st Century: Report of the Congressionally-directed 9/11 Review Commission to the Director of the Federal Bureau of Investigation*, obtained from <https://www.fbi.gov/news/pressrel/press-releases/the-fbi-releases-final-report-of-the-9-11-review-commission> (by clicking the link titled “Read full copy of report (pdf)”).

10. Exhibit 6 is the Statement by the Office of the Director of National Intelligence on the Declassification of Part Four of the Senate Select Committee on Intelligence and House Permanent Select Committee on Intelligence’s 2002 Report on the Committees’ Joint Inquiry into Intelligence Community Activities Before and After the Terrorist Attacks of September 11, 2001 (July 15, 2016), obtained from <https://www.dni.gov/index.php/newsroom/congressional-testimonies/congressional-testimonies-2016/item/1612-statement-by-the-odni-on-the-declassification-of-part-four-of-the-ssci-and-hpsci-s-2002-report-on-the-committees-joint-inquiry-into-intelligence-community-activities-before-and-after-the-terrorist-attacks-of-september-11-2001>.

11. Exhibit 7 is Plaintiffs' First Set of Jurisdictional Requests for Production of Documents Directed to the Kingdom of Saudi Arabia, dated June 21, 2017, and served on the Kingdom of Saudi Arabia in connection with this litigation.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: July 31, 2017  
Washington, D.C.

  
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Gregory G. Rapawy