

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

----- X

SHMUEL ELIMELECH BRAUN, *et al.*,

Plaintiff,

Docket No:

-against-

1:15-CV-01136(BAH)

THE ISLAMIC REPUBLIC OF IRAN, *et al.*,

Defendants.

----- X

**MOTION FOR JUDGMENT ON DEFAULT
AND TO SCHEDULE AN EVIDENTIARY HEARING**

Plaintiffs respectfully move this Court pursuant to 28 U.S.C. § 1608(e): (1) for entry of a judgment on default as against the defendants (a) The Islamic Republic of Iran (“Iran”), (b) the Ministry of Information and Security (“MOIS”) and (c) the Syrian Arab Republic (“Syria”) and (2) to schedule an evidentiary hearing at which plaintiffs will present testimony and evidence in support of their claims for relief against these defendants. In support of the motion, plaintiffs respectfully state as follows:

1. The Clerk has noted these defendants’ defaults (DE 27; 30).
2. While entry of default normally establishes a defendant’s liability, the FSIA provides that: “No judgment by default shall be entered . . . against a foreign state, a political subdivision thereof, or an agency or instrumentality of a foreign state, unless the claimant establishes his right to relief by evidence satisfactory to the court.” FSIA § 1608(e).
3. Accordingly, plaintiffs respectfully request that the Court schedule an evidentiary hearing at which plaintiffs will present testimony and evidence in support of their claims for

relief, following which plaintiffs respectfully request that the court enter a judgment on default as against each of the defendants: (a) Iran, (b) MOIS and (c) Syria.

4. Due to the logistics of travel for many of plaintiffs' witnesses and the Jewish high holidays, which fall during the month of October this year, plaintiffs respectfully request that the hearing not be scheduled between the following dates: September 26, 2016 and October 31, 2016.

5. In support of their request for a default judgment, plaintiffs intend to present testimony on liability from the following experts: (1) Dr. Patrick Clawson to address Iran's provision of material support to Hamas, (2) Dr. Marius Deeb to address Syria's provision of material support to Hamas, (3) Arieh Spitz, Israel Defense Forces Colonel (retired) to address Hamas responsibility for the attack, (4) Dr. Matthew Levitt to address Iran's provision of material support to Hamas, and (5) Dr. Benedetta Berti to address Syria's provision of material support to Hamas. The sworn declarations of Dr. Patrick Clawson, Dr. Marius Deeb and Arieh Dan Spitz summarizing the opinions about which they will testify are attached hereto as Exhibits 1, 2 and 3 respectively. The sworn declarations of Dr. Matthew Levitt and Dr. Benedetta Berti summarizing their opinions are being finalized and will be filed within the next six to eight weeks.

6. In support of their request for a default judgment, plaintiffs also intend to present testimony from each of the plaintiffs regarding their damages. The following sworn declarations are attached hereto as Exhibits 4-9, respectively:

Exhibit 4 – Declaration of Chana Braun

Exhibit 5 – Declaration of Shmuel Elimelech Braun

Exhibit 6 – Declaration of Esther Braun

Exhibit 7 – Declaration of Murray Braun

Exhibit 8 – Declaration of Sara Halperin

Exhibit 9 – Declaration of Shimshon (Sam) Halperin

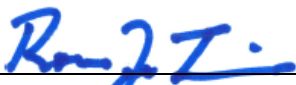
7. In addition, plaintiffs intend to present testimony from: (1) Dr. Alan Friedman, MD as a medical expert concerning plaintiff Shmuel Elimelech Braun's physical damages and (2) Dr. Rael Strous, MD as a psychiatric expert concerning each of plaintiffs' psychological and emotional damages. The sworn declaration of Dr. Alan Friedman is attached hereto as Exhibit 10. The sworn declarations of Dr. Strous for each plaintiff are attached hereto as Exhibits 11-16, respectively.

WHEREFORE, plaintiffs respectfully request that the Court schedule an evidentiary hearing at which plaintiffs will present testimony and evidence in support of their claims for relief, following which plaintiffs respectfully request that the court enter a judgment on default as against each of the defendants – Iran, MOIS and Syria, and grant any other relief the Court finds just and proper.

Dated: Brooklyn, New York
May 25, 2016

Respectfully submitted,

THE BERKMAN LAW OFFICE, LLC
Attorneys for the Plaintiff

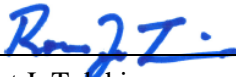
by: 
Robert J. Tolchin

111 Livingston Street, Suite 1928
Brooklyn, New York 11201
718-855-3627

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date indicated below a true copy of the foregoing was served via ECF on all counsel of record herein:

Dated: Brooklyn, New York
May 25, 2016



Robert J. Tolchin

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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----- X

**[Proposed]
ORDER**

For the reasons set forth in Plaintiffs' Motion for Judgment on Default, it is hereby:

ORDERED, pursuant to 28 U.S.C. § 1608(e), that an evidentiary hearing is scheduled in this matter for _____, 2016, following which the Court will consider plaintiffs' request for a judgment on default.

SO ORDERED

Date:

Chief United States District Judge

EXHIBIT 16

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
SHMUEL ELIMELECH BRAUN, et. al.)	
)	
Plaintiff,)	Civ. No. 1:15-cv-01136-BAH
)	
v.)	
)	
THE ISLAMIC REPUBLIC OF IRAN, et al.,)	
)	
Defendants.)	
_____)	

EXPERT DECLARATION OF DR. RAEL STROUS

Re: Sam Halperin

I have been retained by the Plaintiffs in the matter of *Braun v. The Islamic Republic of Iran* to provide a report and testimony regarding the mental health of Sam Halperin.

Professional Qualifications

1. I am a Medical Doctor specializing in psychiatry. I am currently employed as the Deputy Hospital Director and Director of the Ambulatory Service of the Be'er Yaakov Mental Health Center located in Be'er Yaakov, Israel. I also serve as Full Professor, Department of Psychiatry at the Sackler Faculty of Medicine at the Tel Aviv University and maintain a small private practice in clinical psychiatry.

2. I received my medical degree in 1989 from the University of Witwatersrand in Johannesburg, South Africa. Between 1992 and 1996, I performed my residency in psychiatry at the Albert Einstein College of Medicine in the Bronx, New York. In 1996, I served as Chief Resident at the Bronx Psychiatric State Hospital. From 1996 through 1998, I performed a

Expert Declaration of Dr. Rael Strous

Re. Sam Halperin

24 May 2016

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clinical research fellowship in psychopharmacology at the Commonwealth Research Center, Massachusetts Mental Health Center affiliated with the Harvard Medical School.

3. Before embarking on my career in psychiatry, I served as an emergency room doctor and as a general physician in pediatrics and trauma.

4. I have approximately 150 peer reviewed research publications to my name including several in the field of chronic post-traumatic stress disorder (PTSD).

5. Based on my education and experience as outlined above, I have provided expert reports that were submitted as exhibits in *Biton v. The Palestinian Interim Self-Government Authority, et al.*, 01 CV 382 (RWR), *Gilmore v. The Palestinian Interim Self-Government Authority et al.*, 01-cv-00853 (GK), *Rubin v. Islamic Republic of Iran_01-1655* (RCL), *Ben Haim v. Islamic Republic of Iran*, 02-01811 (RCL) and *Kaplan v. Hezbollah, et al.*, No. 09-cv-646 (RWR) in the United States District Court for the District of Columbia, *Leibovitch v. The Syrian Arab Republic et al.*, 08 CV 01939 (WTH) in the United States District Court for the Northern District of Illinois, and in *Shatsky v. The Syrian Arab Republic et. al.*, 02-2280-RJL in the United States District Court of the District of Columbia. I testified at a deposition in, *Saperstein v. Palestinian Authority*, Case No. 0420225-CIV-Turnoff in the United States District Court for the Southern District of Florida. I have testified as an expert at one trial *Sokolow vs Palestinian Liberation Organization et al.*, 04-CV-397(GBD). In Israel, I have also submitted court mandated evaluations of psychiatric patients.

6. A copy of my curriculum vitae including a list of all publications authored by me within the preceding ten years is attached hereto.

Expert Declaration of Dr. Rael Strous

Re. Sam Halperin

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7. I have been asked to provide an evaluation for Sam Halperin. To prepare this evaluation, I examined Plaintiff Sam Halperin on 3 May 2016. Upon examining Sam Halperin, I prepared a written Psychiatric Evaluation for him. That written Psychiatric Evaluation represented my professional assessment of Sam Halperin. Accordingly, I incorporate by reference into this report the Psychiatric Evaluation regarding Plaintiff Sam Halperin dated 3 May 2016 (attached hereto).

Psychiatric Disorders

8. To facilitate understanding and analysis of the Psychiatric Evaluation, I am including a brief explanation of Persistent Complex Bereavement Disorder and Post-traumatic Stress Disorder which afflicts Sam Halperin as indicated in his Psychiatric Evaluation.

Persistent Complex Bereavement Disorder

9. Persistent Complex Bereavement Disorder (also known as Pathological Grief or Complicated Mourning) refers to a description of the normal mourning process that leads to chronic or ongoing mourning. The term "Pathological Grief" is applied to people who are unable to get over their grief despite the passage of time. It can take most people up to several years to get past a serious loss especially when the loss is associated with a violent and unexpected death. The person may experience intrusive distressing preoccupation with the deceased and wish to be reunited with the deceased. They may feel a sense of futility about the future, difficulty acknowledging the death, excessive irritability, bitterness or anger about the unfairness of the death and most significantly impaired social/occupational functioning. A pathological grief

Expert Declaration of Dr. Rael Strous

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reaction is usually diagnosed after a long time (one or more years) have passed and the grieving person is not improving.

Post-Traumatic Stress Disorder

10. Post-Traumatic Stress Disorder (“PTSD”) is a condition which develops from having been exposed to, or witnessing, life-threatening events. In addition, the traumatic event may be indirect, by hearing of a relative or close friend who has experienced the life threatening event. Indirectly experienced death must be accidental or violent. PTSD is characterized by distinct types of symptoms. These symptoms include avoidance, re-experiencing the event, and hyper-vigilance. Avoidance is the active escape from situations that the PTSD victim associates with the event. Re-experiencing is reliving the memory of the event. Hypervigilance is a cluster of symptoms that includes exaggerated startle response, inability to fall asleep and inability to stay asleep.

11. The disorder is also characterized by negative alterations in mood or cognitions which indicates a decline in someone’s mood or thought patterns. This can include memory problems that are exclusive to the event, negative thoughts or beliefs about one’s self or the world, distorted sense of blame for one’s self or others, related to the event, being stuck in severe emotions related to the trauma (e.g. horror, shame, sadness), severely reduced interest in pre-trauma activities and feeling detached, isolated or disconnected from other people.

12. Due to their suffering and symptoms, educational and employment prospects for PTSD victims are often lowered. Some have difficulty interacting with others.

13. Younger victims and females may be more likely to be susceptible to PTSD.

Expert Declaration of Dr. Rael Strous

Re. Sam Halperin

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14. Overall effects on PTSD patients from this illness are severe. Patients are easily distractible due to their exaggerated response to stimuli. Individuals face considerably lowered employment prospects and increased likelihood of difficulty in forming and maintaining interpersonal relationships. For those who are married or who are able to marry and have children the stress of childrearing will be compounded. The inability to relax and have a good time is extremely common with PTSD patients.

15. Sam Halperin displays some form of Persistent Complex Bereavement Disorder and Post-traumatic Stress Disorder either currently or in the past as a result of his granddaughter being killed in a terror attack in 2014.

16. Based on my evaluation of Sam Halperin, I believe that many of his symptoms with which he has been diagnosed are likely to be present in varying degrees for a significant time to come and while it is impossible to state for any absolute certainty, many of the symptoms may even be permanent.

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

Dated: 24 May 2016



Rael Strous, MD

Rael Strous MD

Psychiatrist

PO Box 940, Beit Shemesh 9910901, Israel

Tel: 972-544-628254

Email: rael@post.tau.ac.il

USA Board Certified Psychiatrist

Israel Medical License: 31932

Israel Psychiatry License: 17270

3 May 2016

Psychiatric Evaluation: Sam Halperin

Date of Birth: REDACTED

This evaluation is based on clinical interview and formal psychiatric evaluation, as well as my review of the discovery materials in this case as listed in my introduction. My opinions are stated within a reasonable degree of medical certainty.

Identifying Information

Sam Halperin is a 64-year-old male dual USA and Israeli citizen currently residing in New York, USA. He was born in Israel and moved to the USA in his twenties where he has lived ever since. He is the father of 8 children. He works in the real estate business.

Presenting Problem

He recalls that on that day of 22 October 2014, he was at a wedding in Israel. He had just been talking to a cousin about how one could receive a single phone call that could change your life. He then received a call from his daughter informing him that her daughter (his granddaughter) had been in a terror attack and that they were on their way to the hospital. He rushed off to the hospital. He recalls that the doctors worked on her for about an hour in his estimation; however they were not able to

revive her. He reports that his daughter Chana was hysterical during this entire time. Eventually, they were told by the doctors that they were not able to do anything to save her life and that she had passed away.

He indicates that he felt "extremely terrible, sad and helpless". He questioned, "from all of Israel why did this happen to this little girl?" His parents had waited so long for this child and for this to happen? The shock for him was immense and overpowering. He recalls that he would sit and just cry and cry. This was very much out of character for him. He felt that his heart was completely torn from him. He was not able to sleep for weeks. He would go to sleep and keep on waking up during the night. He reports that he was so distressed that he could not function. He did not know what to do with himself. He turned to a prominent Rabbi for help and was comforted to some extent with the blessing from this Rabbi that the couple (his daughter and son-in-law) would have another child in 10 months.

Long-term Physical and Psychological Repercussions Following the Event

Mr. Halperin indicates since the loss his life has never returned to how it was prior to the terror attack and devastating loss of his granddaughter. He reports that he looks at life completely differently now. He realizes that it is true that one's life can be irreversibly changed from just one phone call. He tries now to see that some things that seem important are not, and others that are not so important actually are. This together with his now developed fatalistic approach to life has changed how he sees the world.

He remains feeling "terrible" about the whole incident in general. More specifically, over time the pain has become even more acute since he sees how his daughter was so affected in the long term by the loss and how he as her father was not able to protect her and "make her better". This is an ongoing source of pain and guilt for him. In addition to the pain that he feels regarding his daughter and how she suffered through the loss, he also feels the loss immensely from his perspective. He indicates that he would spend a great deal of time with his granddaughter when he was around and felt very close and attached to her.

When he returned after the acute loss, he struggled to get back to work and function as before. He recalls that his concentration remained impaired for a great deal of time. This affected his ability at work. In addition, in general he had become tense and more serious, and this affected both his business and social relationships. Most importantly he reports that he was not able to enjoy anything he did as much as before. He felt as if the color of life had been removed from his experiences. He became much more introspective and less loving of life. He kept of ruminating over the loss and story of what happened. This brings tears to his eyes often at inopportune moments, further affecting his function. This "hurt and pain" still significantly affect him to this day.

Due to his irritability, tension and nervousness that he developed after the loss, as well as how it affected his work and relationships, his wife tried very hard to convince him to take medication. However he has refused up until the present despite the fact that he knows that he probably should and finally deal with how he has been affected since the terror attack.

Post-traumatic symptoms:

1. He admits to flashbacks intermittently of the traumatic period when he received the news. It remains also difficult for him to prevent flashbacks to the sight around the time of the tragedy with his daughter suffering so much.
2. Becomes very emotional when reminded of the event to this day.
3. Since the event, he indicates that he has much less interest in activities in which he participated in the past. These refer mostly to social and communal activities.
4. Denies any dreams or nightmares.
5. Admits to becoming more on edge and jumpy since the event.

Previous Psychiatric Illnesses

Mr. Halperin reports no psychiatric history of any type prior to the terror event.

Alcohol or Substance History

He reports no use of any drugs or smoking.

Current Medical Illnesses

None reported

Family Psychiatric History

None reported

Mental Status

General appearance: Groomed appropriately.

Behavior: Appears a little distant and reluctant to talk about the event. Visibly emotional especially when talking about holding his granddaughter in his arms as well as when describing his experience of seeing his daughter suffer so much losing her child..

Affect: Euthymic. However becomes overtly emotional when talking about his granddaughter and the effect her loss had on his daughter.

Mood: Denies feeling overtly depressed, but does admit to activities being less enjoyable since the event due to the effect it had on him and his close family.

Speech: Clear and coherent

Thought disorder: No evidence of formal thought disorder.

Thought Content: No evidence of delusional content.

Perceptual Disorder: No evidence of past or present hallucinations. No evidence of psychosis.

Neurocognitive and neuropsychiatric status: fully alert and oriented. Concentration and attention ability is intact.

Impulse Control: Intact.

Insight: Good.

Judgment: Good.

Reliability of Mental status and interview: very good.

Psychological Testing

HAM-D and HAM-A rating scales, PTSD scale (PDS) and Pathological Grief screening questionnaires were administered.

The Hamilton Depression rating scale (also known as the Ham-D) is the most widely used clinician-administered depression assessment scale. The original version contains 17 items (HDRS17) relating to symptoms of depression experienced over the past week. **The Hamilton Anxiety Rating Scale** (HAM-A) is a widely used and well-validated tool for measuring the severity of a patient's anxiety. The HAM-A probes 14 parameters.

The **Post-Traumatic Stress Diagnostic Scale (PDS)** is a 49-item self-report measure used in clinical or research settings to measure severity of Post-traumatic Stress Disorder (PTSD) symptoms related to a single identified traumatic event. The PDS has four sections. Part 1 is a trauma checklist. In Part 2, those completing the scale are asked about this most disturbing traumatic event including when it happened, if anyone was injured, perceived life threat, and whether the event resulted in helplessness or terror. Part 3 evaluates 17 PTSD symptoms. Respondents are asked to rate the severity of the symptom from 0 ("not at all or only one time") to 3 ("5 or more times a week / almost always"). Part 4 assesses influence of the symptoms in their lives.

A semi-structured interview format to facilitate assessment of complicated grief, developed by Shear et al., was administered (**Interview Guide for Complicated Grief**). This is a screening rating scale with two Parts (A and B). The first section requires at least one of 4 symptoms to be endorsed indicating experience over the past month. The second section requires at least two of 8 symptoms to be endorsed. In addition, the **Brief Grief Questionnaire** developed by Shear and Essock was administered consisting of 5 screening questions (0-2) for Complicated Grief disorder.

Scores indicate presence of no depression (score of 3 on the Ham-D), moderate PTSD (score of 13 on the PDS) and presence of pathological/complicated grief (2 of 4 on Part A, 2 of 8 on Part B; Score of 4 on Brief Grief Questionnaire). Please see attached documents with detailed scoring.

Report of Psychologist Dr Norman Blumenthal

Reports that on October 28 while he was on a visit to Israel, he met for close to two hours with Chaya Zissel's parents and grandparents to therapeutically assist them with

their trauma reactions and grief. He reports that the grandparents (Including Sam Halperin), who were seen separately, were also assisted in clarifying their roles as providers of support and sympathy while maintaining optimal and therapeutic levels of discretion and independence.

Summary of Observations

Sam Halperin is a 64-year-old male with signs and symptoms of partial PTSD and pathological/complicated grief since his 3-month old granddaughter died following a terror attack during which she was run over and killed. He indicates clearly how his life has been changed since the event with effects most prominently on social involvement and enjoyment of activities. He remains especially still pained by the effects that the loss had on his daughter. He reports that the pain that he experienced seeing his daughter suffer so much has forever changed him for the worse.

Prognosis

Sam Halperin suffered devastating anguish and grief following the loss of his granddaughter in a terror attack in 2014. He expresses how much his life has been irreversibly affected in light of the experience and the death of his granddaughter. It is not expected that his feelings of grief affecting his interpersonal functioning and enjoyment of activities will resolve in the short term, and they will continue to affect him indefinitely.

Diagnostic Formulation

309.89 (F43.8) Persistent Complex Bereavement Disorder; (mild) with traumatic bereavement

309.81 (F43.10) Post-traumatic Stress Disorder (partial)



Rael Strous MD

Attachments: HAM-D rating scale results

PDS scale

Pathological Grief Screening (Interview Guide for Complicated Grief, Brief Grief Questionnaire)

Curriculum Vitae (Rael Strous MD)

Curriculum Vitae: Rael D. Strous MD

PO Box 1, Beer Yaakov, 70350, Israel

Tel: 972-544628254

Email: rael@post.tau.ac.il

Current Title and Affiliation:

Director Chronic Inpatient Unit, Beer Yaakov Mental Health Center

Associate Professor, Department of Psychiatry, Sackler Faculty of Medicine, Tel Aviv University

EDUCATION

- 1984 – 1989 Medical School, *University of Witwatersrand*, Johannesburg, South Africa, MBBCh
 1992 – 1996 Psychiatry residency, *Albert Einstein College of Medicine*, New York (USA Board Certification)
 1996 – 1998 Clinical Research Fellowship in Psychopharmacology, Massachusetts Mental Health Center, *Harvard Medical School*, Boston, USA

ADDITIONAL STUDIES

- 1987-1989 Psychology, Theological Bioethics, University of South Africa, Pretoria, South Africa
 1996 Neuroimaging Mini-Fellowship, Columbia University, NY, USA
 1995 Board Certification Forensic Examination, American College of Forensic Examiners

PROFESSIONAL EXPERIENCE

- 1990 Internship, Hillbrow Hospital, Medicine, Surgery, Johannesburg, South Africa
 1991 Alexandra Health Center, Ambulatory Med., General physician, Johannesburg, South Africa
 1991 Johannesburg General Hospital, Emergency Room MD
 1992-1996 Psychiatry Resident, **Albert Einstein College of Medicine**, Bronx Municipal Hospital, North Central Bronx Hospital, Montefiore Hospital (Chief Resident Bronx Psychiatric State 1995/6)
 1996-1998 Research Fellow, Commonwealth Research Center, Massachusetts Mental Health Center, **Harvard Medical School**
 1999–present Beer Yaakov Mental Health Center, Director Chronic Inpatient Unit (from 2003)
 2001-present Sackler Faculty of Medicine, Tel Aviv University Lecturer and Tutor
 Medical Students in Psychiatry
 2002-2006 Member Physician Committee, Beer Yaakov Mental Health Center Psychiatry
 2002-present Chairman Medication Committee, Beer Yaakov Mental Health Center
 2003-2006 Israel Society of Biological Psychiatry, Executive Board Member
 2003-2006 Israel Society of Biological Psychiatry Annual Conference Committee Member
 2004-present World Psychiatry Association (WPA) Section on Religion Committee Member
 2005-2006 World Psychiatry Association (WPA) Section, Committee Member
 on Law and Psychiatry
 2006, 2009, 2011 Israel Psychiatry Association Annual Congress, Scientific Organization Committee Member
 2005-2010 Member Clinical Teaching Committee, Sackler Faculty of Medicine, Tel Aviv University

ACADEMIC AND RESEARCH ACTIVITIES, SACKLER FACULTY OF MEDICINE

2009-2010: Director, New York State/American Program, Sackler Faculty of Medicine, Tel Aviv University
 2008-2010 Member Medical School Curriculum Committee
 2008-2010 Member Four Year Medical School Program Steering Committee
 2003-present: Member Medical School Admissions Evaluation Team
 2003-2008: Coordinator medical student exam in psychiatry (USA and Israeli medical students)
 2003-2006: Executive Board Member, Israel Society of Biological Psychiatry
 2005-present Member Editorial Board: Law and Medicine Journal
 2005-2010: Member Clinical Teaching Committee, Sackler Faculty of Medicine
 2006-present: Deputy Editor, Israel Journal of Psychiatry
 2008-2010: Member Planning Committee for four-year medical degree, Sackler Faculty of Medicine

ACADEMIC AND PROFESSIONAL AWARDS

1988 Alice Cox Award, Best medical student in psychiatry, University Witwatersrand Medical School
 1992-5 Top psychiatric resident in annual national PRITE examination, Department of Psychiatry
 Albert Einstein College of Medicine (top 1% of all USA psychiatry residents)
 1994/95 Burroughs Wellcome Leadership Award, American Medical Association (AMA)
 1994/95 Mead Johnson Fellowship Award, American Psychiatric Association (APA)
 1995 Young Investigator Award International Congress on Schizophrenia Research, USA
 1995 Lilly Resident Research Award, American Psychiatric Association (APA)
 1995/96 Young Scientist Award, 8th Biennial Winter Workshop on Schizophrenia (Switzerland)
 1996 Young Investigator Award, Society of Biological Psychiatry
 1996/7 Young Researcher Award, American Neuropsychiatric Association
 1996 Dupont-Warren Fellowship Award, Department of Psychiatry, *Harvard Medical School*
 1996 New Investigator Award (NCDEU)/National Institute Mental Health, USA (NIMH)
 2000 Rafaelsen Fellowship Award, Collegium Internationale Neuropsychopharmacologicum (CINP)
 2001 Fellowship Award, World Congress of Biological Psychiatry
 2002 Fellowship Award, European College of Neuropsychopharmacology (ECNP)
 2002 Team Award for Best Research Paper, Israel Psychiatry Association
 2002 Clinical Research Award: Best Clinical Research Paper, Israel Society of Biological Psychiatry
 2004 Outstanding Young Investigator Award, International Congress of Biological Psychiatry
 2004 Donald Cohen Fellowship Award, International Association of Child Psychiatry and Allied
 Professions (IACAPAP)
 2004 **Outstanding Teacher/Lecturer of the Year**, Sackler Faculty of Medicine, Tel Aviv University
 2006 Certificate of Honor (research presentation), Israel Society for Biological Psychiatry
 2007 **Outstanding Teacher/Lecturer of the Year**, Sackler Faculty of Medicine, Tel Aviv University
 2010 **Immigrant Scientist Recognition Award** from Israel Ministry of Immigration
 2010 **Outstanding Employee of Year**, Beer Yaakov Mental Health Center

GRANTS AWARDED

2000 Ministry Of Science: Chief Scientist Award, PRINCIPAL INVESTIGATOR, Clinical study of first-episode psychosis
 2000 Israel Institute of Psychobiology Grant, PRINCIPAL INVESTIGATOR, Functional MRI investigation in first-episode schizophrenia
 2000 Guggenheim Foundation Grant, PRINCIPAL INVESTIGATOR, Genetic polymorphisms in violence and aggression
 2000 Israel Ministry Of Defense Research Grant, PRINCIPAL INVESTIGATOR, Novel pharmacological management of treatment resistant PTSD

- 2000 NARSAD Young Investigator Award, PRINCIPAL INVESTIGATOR, Novel augmentation strategies with neurosteroids in schizophrenia
- 2002 Stanley Foundation Grant, CO- PRINCIPAL INVESTIGATOR, Neurosteroids in schizophrenia
- 2002 India-Israel Research Project, CO-INVESTIGATOR, Genetics of Schizophrenia
- 2002 Dreyfuss Health Foundation, PRINCIPAL INVESTIGATOR, Treatment resistant schizophrenia
- 2003 Stanley Foundation Grant, PRINCIPAL INVESTIGATOR, Methyl donors in schizophrenia
- 2003 NARSAD Young Investigator Award, PRINCIPAL INVESTIGATOR, Neurosteroids and management of treatment resistance and medication related side-effects in schizophrenia
- 2007 Mordechai Ofer Research Award Grant, Tel Aviv University, PRINCIPAL INVESTIGATOR, Psychiatry during the Nazi era, its relevance today and ethical ramifications for current practice

MEMBERSHIP IN PROFESSIONAL SOCIETIES

- 2003-present World Society of Biological Psychiatry
- 2003 International Group Therapy Association
- 2001-present European College of Neuropsychopharmacology (ECNP)
- 1999-present Israel Medical Society
- 1999-present Israel Psychiatric Association
- 1999-present Israel Society for Biological Psychiatry
- 1996 American College of Forensic Examiners
- 1996-8 Massachusetts Society of Medicine, USA
- 1994-8, 2006 International Society of Political Psychology
- 1992-1998 American Psychiatric Association
- 1990 South African Medical & Dental Council
- 1990 General Medical Council (Great Britain)

ACTIVE PARTICIPATION IN SCIENTIFIC MEETINGS (Poster or Lecture presentation)

- 1992 American Psychiatric Association, USA
- 1993 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Conference of Political Psychology, Boston, USA
Institute of Psychiatric Services, San Diego, USA
- 1994 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Congress on Schizophrenia Research, Colorado, USA
Institute of Psychiatric Services, Boston, USA
- 1995 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Congress on Schizophrenia Research, Switzerland
New Clinical Drug Evaluation Unit (NCDEU), Boca Raton, USA
American Neuropsychiatric Association, Orlando, USA
- 1996 American Psychiatric Association, USA
- 1997 Society of Biological Psychiatry, Kfar Giladi, Israel
- 1998 Israel Society of Neuroscience, Eilat, Israel
IBRO, International Brain Research Organization, Jerusalem, Israel
- 1999 CINP, Brussels, Belgium

- Israel Psychiatry Association, Jerusalem, Israel
 Israel Society of Neuroscience, Eilat, Israel
- 2001 American Psychiatric Association, New Orleans, USA
 World Congress Biological Psychiatry, Berlin, Germany
- 2002 Association of European Psychiatrists, Stockholm, Sweden
 ECNP, Barcelona Spain
 Pharmacogenetics, Mayo Clinic, Minnesota, USA
- 2003 European Conference on Violence in Clinical Psychiatry, London, England
 ACNP, Puerto Rico, USA
- 2004 International Congress of Biological Psychiatry
 Society of Biological Psychiatry, Hagoshrim, Israel
 International Congress of Neuropsychiatry, Athens, Greece
- 2005 Society of Biological Psychiatry, Hagoshrim, Israel
 International Conference on Medical Ethics, Haifa
 American Psychiatric Association, Atlanta, USA
 World Congress Biological Psychiatry, Vienna, Germany
- 2006 Nefesh Israel, Jerusalem (**Lecturer**)
 Society of Biological Psychiatry, Hagoshrim, Israel (**Lecturer**)
 Israel Psychiatry Association, Tel Aviv (**Lecturer**)
 International Society of Political Psychology, Barcelona, Spain (**Lecturer**)
 World Association Medical Law, Toulouse, France (**Lecturer**)
 ECNP (European College Neuropsychopharmacology) Paris, France
- 2007 Society of Biological Psychiatry, Hagoshrim, Israel (**Lecturer**)
 World Psychiatry Association: Coercive Treatment in Psychiatry, Dresden, Germany
(Lecturer)
- 2008 Society of Biological Psychiatry, Israel
- 2009 Nahariah Conference on Holocaust (**Lecturer**)
 Israel Medical Association Conference (**Lecturer**)
 Brother-Other: Israel/Poland Mental Health Association, Krakow, Poland (**Lecturer**)
- 2010 CINP, Hong Kong (**Lecturer**)
 Society for International Research of Schizophrenia (SIRS), Florence, Italy (**Lecturer**)
 International Conference on 'Integrating Traditional Healing Practices into Counseling
 Psychology, Psychotherapy and Psychiatry.' Durban, South Africa, (**Lecturer**)
- 2011 International Conference, Medical Ethics, Bochum, Germany (**Lecturer**)
 International Conference for Clinical Ethics and Consultation, Amsterdam, Holland
(Lecturer)
 ECNP, Paris, France (**Lecturer**)

REVIEWER FOR FOLLOWING JOURNALS:

Archives of General Psychiatry, American Journal of Psychiatry, British Journal of Psychiatry,
 Neuropharmacology, Journal of Medical Ethics, European Journal of Neuropsychopharmacology,
 Journal of Nervous and Mental Disorders, Psychiatry Research, Schizophrenia Research, Biological
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Chapters in Books

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EXHIBIT 15

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
SHMUEL ELIMELECH BRAUN, et. al.)	
)	
Plaintiff,)	Civ. No. 1:15-cv-01136-BAH
)	
v.)	
)	
THE ISLAMIC REPUBLIC OF IRAN, et al.,)	
)	
Defendants.)	
_____)	

EXPERT DECLARATION OF DR. RAEL STROUS

Re: Sara Halperin

I have been retained by the Plaintiffs in the matter of *Braun v. The Islamic Republic of Iran* to provide a report and testimony regarding the mental health of Sara Halperin.

Professional Qualifications

1. I am a Medical Doctor specializing in psychiatry. I am currently employed as the Deputy Hospital Director and Director of the Ambulatory Service of the Be'er Yaakov Mental Health Center located in Be'er Yaakov, Israel. I also serve as Full Professor, Department of Psychiatry at the Sackler Faculty of Medicine at the Tel Aviv University and maintain a small private practice in clinical psychiatry.

2. I received my medical degree in 1989 from the University of Witwatersrand in Johannesburg, South Africa. Between 1992 and 1996, I performed my residency in psychiatry at the Albert Einstein College of Medicine in the Bronx, New York. In 1996, I served as Chief Resident at the Bronx Psychiatric State Hospital. From 1996 through 1998, I performed a clinical research fellowship in psychopharmacology at the Commonwealth Research Center, Massachusetts Mental Health Center affiliated with the Harvard Medical School.

Expert Declaration of Dr. Rael Strous

Re. Sara Halperin

24 May 2016

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3. Before embarking on my career in psychiatry, I served as an emergency room doctor and as a general physician in pediatrics and trauma.

4. I have approximately 150 peer reviewed research publications to my name including several in the field of chronic post-traumatic stress disorder (PTSD).

5. Based on my education and experience as outlined above, I have provided expert reports that were submitted as exhibits in *Biton v. The Palestinian Interim Self-Government Authority, et al.*, 01 CV 382 (RWR), *Gilmore v. The Palestinian Interim Self-Government Authority et al.*, 01-cv-00853 (GK), *Rubin v. Islamic Republic of Iran_01-1655* (RCL), *Ben Haim v. Islamic Republic of Iran*, 02-01811 (RCL) and *Kaplan v. Hezbollah, et al.*, No. 09-cv-646 (RWR) in the United States District Court for the District of Columbia, *Leibovitch v. The Syrian Arab Republic et al.*, 08 CV 01939 (WTH) in the United States District Court for the Northern District of Illinois, and in *Shatsky v. The Syrian Arab Republic et. al.*, 02-2280-RJL in the United States District Court of the District of Columbia. I testified at a deposition in, *Saperstein v. Palestinian Authority*, Case No. 0420225-CIV-Turnoff in the United States District Court for the Southern District of Florida. I have testified as an expert at one trial *Sokolow vs Palestinian Liberation Organization et al.*, 04-CV-397(GBD). In Israel, I have also submitted court mandated evaluations of psychiatric patients.

6. A copy of my curriculum vitae including a list of all publications authored by me within the preceding ten years is attached hereto.

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Re. Sara Halperin

24 May 2016

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7. I have been asked to provide an evaluation for Sara Halperin. To prepare this evaluation, I examined Plaintiff Sara Halperin on 3 May 2016. Upon examining Sara Halperin, I prepared a written Psychiatric Evaluation for her. That written Psychiatric Evaluation represented my professional assessment of Sara Halperin. Accordingly, I incorporate by reference into this report the Psychiatric Evaluation regarding Plaintiff Sara Halperin dated 3 May 2016 (attached hereto).

Psychiatric Disorders

8. To facilitate understanding and analysis of the Psychiatric Evaluation, I am including a brief explanation of Persistent Complex Bereavement Disorder and Post-traumatic Stress Disorder which afflicts Sara Halperin as indicated in her Psychiatric Evaluation.

Persistent Complex Bereavement Disorder

9. Persistent Complex Bereavement Disorder (also known as Pathological Grief or Complicated Mourning) refers to a description of the normal mourning process that leads to chronic or ongoing mourning. The term "Pathological Grief" is applied to people who are unable to get over their grief despite the passage of time. It can take most people up to several years to get past a serious loss especially when the loss is associated with a violent and unexpected death. The person may experience intrusive distressing preoccupation with the deceased and wish to be reunited with the deceased. They may feel a sense of futility about the future, difficulty acknowledging the death, excessive irritability, bitterness or anger about the unfairness of the death and most significantly impaired social/occupational functioning. A pathological grief reaction is usually diagnosed after a long time (one or more years) have passed and the grieving person is not improving.

Post-Traumatic Stress Disorder

10. Post-Traumatic Stress Disorder (“PTSD”) is a condition which develops from having been exposed to, or witnessing, life-threatening events. In addition, the traumatic event may be indirect, by hearing of a relative or close friend who has experienced the life threatening event. Indirectly experienced death must be accidental or violent. PTSD is characterized by distinct types of symptoms. These symptoms include avoidance, re-experiencing the event, and hyper-vigilance. Avoidance is the active escape from situations that the PTSD victim associates with the event. Re-experiencing is reliving the memory of the event. Hypervigilance is a cluster of symptoms that includes exaggerated startle response, inability to fall asleep and inability to stay asleep.

11. The disorder is also characterized by negative alterations in mood or cognitions which indicates a decline in someone’s mood or thought patterns. This can include memory problems that are exclusive to the event, negative thoughts or beliefs about one’s self or the world, distorted sense of blame for one’s self or others, related to the event, being stuck in severe emotions related to the trauma (e.g. horror, shame, sadness), severely reduced interest in pre-trauma activities and feeling detached, isolated or disconnected from other people.

12. Due to their suffering and symptoms, educational and employment prospects for PTSD victims are often lowered. Some have difficulty interacting with others.

13. Younger victims and females may be more likely to be susceptible to PTSD.

14. Overall effects on PTSD patients from this illness are severe. Patients are easily distractible due to their exaggerated response to stimuli. Individuals face considerably

Expert Declaration of Dr. Rael Strous

Re. Sara Halperin

24 May 2016

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lowered employment prospects and increased likelihood of difficulty in forming and maintaining interpersonal relationships. For those who are married or who are able to marry and have children the stress of childrearing will be compounded. The inability to relax and have a good time is extremely common with PTSD patients.

15. Sara Halperin displays some form of Persistent Complex Bereavement Disorder and Post-traumatic Stress Disorder either currently or in the past as a result of her granddaughter being killed in a terror attack in 2014.

16. Based on my evaluation of Sara Halperin, I believe that many of her symptoms with which she has been diagnosed are likely to be present in varying degrees for a significant time to come and while it is impossible to state for any absolute certainty, many of the symptoms may even be permanent.

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

Dated: 24 May 2016

A handwritten signature in black ink, appearing to read "R. Strous", is written over a light green rectangular background.

Rael Strous, MD

Rael Strous MD

Psychiatrist

PO Box 940, Beit Shemesh 9910901, Israel

Tel: 972-544-628254

Email: rael@post.tau.ac.il

USA Board Certified Psychiatrist

Israel Medical License: 31932

Israel Psychiatry License: 17270

3 May 2016

Psychiatric Evaluation: Sara Halperin

Date of Birth: REDACTED

This evaluation is based on clinical interview and formal psychiatric evaluation, as well as my review of the discovery materials in this case as listed in my introduction. My opinions are stated within a reasonable degree of medical certainty.

Identifying Information

Sara Halperin is a 72-year-old female dual USA and Israeli citizen currently residing in New York, USA. She was born in Israel and moved to the USA at age 4 where she has lived ever since. She works with her husband in his real estate business. She is the mother of 8 children.

Presenting Problem

On 22 October 2014, she was in Israel after having celebrated the Sukkot festival with her daughter, her son-in-law and her 3 month old granddaughter Chaya Zissel. Although she was supposed to return to Israel the following Sunday, she decided to return on the Wednesday before. Her flight was at 4pm. Her daughter Chana came via taxi to say goodbye to her. This was prior to her visit to the kotel (Western wall)

where she had been planning to take her daughter Chaya Zissel for the first time. Ms. Halperin did not know that this would be the last time that she would see her granddaughter.

On arrival in New York she was surprised to see many of her family waiting for her inside the airport on her arrival. Even before passport control her sister and other members of the family were waiting to give her the devastating news. The experience of hearing the news was very traumatic. At first she remembers being told that there was an accident. Then she was told it was regarding Chaya Zissel. When she understood that she had died in the terror event after being run down by a terrorist, she broke down and started shaking uncontrollably including kicking of her legs. Due to her extreme response she required a wheelchair. She was told that the funeral had already taken place as per the custom of Jerusalem. She was also advised to return to Israel. This advice was given to her by her Rabbi who informed her that it would be in her and her daughter's best interest for her to return immediately to Israel. She thus returned straight away on the next flight back to Israel without leaving the airport. This was a considerable stress for her but she knew that she had to do it for herself and her family. The next available flight was 2 hours after she landed in New York. She was accompanied by her sister and married daughter on the way back.

In hindsight she believes that it was good that she missed the funeral since her stress and pain was immense and she felt that she would not have been able to manage with being present at the funeral. She recalls that seeing the pain of her daughter and her suffering under such a traumatic situation was completely overwhelming for her and she struggled to cope with the experience of the aftermath of the terror event and her granddaughter's death. Ms. Halperin indicates that the emotional pain was beyond description and devastating beyond any belief for her. She reports that her daughter was "crazy" over her daughter and the loss was shattering. Ms. Halperin repeated on several occasions that to see her daughter suffering in this manner was indescribable for her. This, together with the pain of losing a granddaughter under such traumatic and sudden conditions, leads her to believe that she will never be able to heal from the experience.

In both the short and long term (few months) Ms. Halperin reports that she was not able to sleep or eat. She would cry a lot and need to talk about her pain with friends and family. Many people came to visit and comfort. However she was not able to be comforted since the pain was immense. However it was warming for her to see the unity of people and the range of people who came to help. She stayed in Israel for another "week or so" prior to returning to the USA.

Long-term Physical and Psychological Repercussions Following the Event

Ms. Halperin indicates that in the long term her life has been irreversibly affected since the loss. In addition, she knows that her children are not the same. Her daughter, the mother of Chaya Zissel, is a changed person. She is much more private and less open. She believes that Chana was so close to her daughter and so much loved her, that to lose her was a profound life changing event. Even though she has a new baby now, the first child meant everything to her and she knows that nothing can be a substitute for her daughter.

Post-traumatic symptoms:

1. While the trauma was intense, she denies any nightmares or dreams surrounding the experience. Her sleep however has been restless ever since she lies awake at night worrying about her daughter.
2. As a result of her fairly constant underlying anxiety since the event as she describes it, she developed an increased appetite.
3. She has no flashbacks to the event and being back in Israel; however she has developed flashbacks to her experience of arriving at JFK airport and being told that her granddaughter died in a terror attack.
4. She refuses to ever fly out of JFK and avoids the airport since it brings back intense memories of the event which she still experiences as a "nightmare".
5. She is not able to look at pictures of the event and any newspaper clipping describing what happened.
6. She indicates that the memory of the event constantly weighs on her - she feels that she is not the same person and is forever changed. She does think a great deal about how we cannot take life for granted and has developed a "fateful" approach to life.

7. She feels a great deal of guilt around that she should have spent more time with her granddaughter who died.

Due to her extreme response and reaction, as well as long term emotional effects, she indicates that she was prescribed medication by her doctor "to take every day" for the long term. She does not recall the name of the medication. She decided however not to take the medication due to the stigma of taking medication.

Prior to this traumatic event she had never seen a psychiatrist. However after the event she spoke to "Dr Blumenthal" on several occasions for trauma counselling.

Previous Psychiatric Illnesses

Ms. Halperin reports no psychiatric history of any type prior to the terror event.

Alcohol or Substance History

She reports no use of any drugs or smoking.

Current Medical Illnesses

None reported

Family Psychiatric History

None reported

Mental Status

General appearance: Groomed appropriately.

Behavior: restless, comfortable talking with frequent repeating of comment how much her life has been changed since the terror attack. Appears unable to move on from the event and stuck in her response to the event and how she and her family have been affected.

Affect: Pained expression when describing how she misses her granddaughter and especially when describing effects of the loss on her daughter.

Mood: Admits to daily anxiety since the event – believes she has never returned to where she was before the loss of Chaya Zissel.

Speech: Clear and coherent

Thought disorder: No evidence of formal thought disorder.

Thought Content: No evidence of delusional content.

Perceptual Disorder: No evidence of past or present hallucinations. No evidence of psychosis.

Neurocognitive and neuropsychiatric status: fully alert and oriented. Concentration and attention ability is intact.

Impulse Control: Intact.

Insight: Good.

Judgment: Good.

Reliability of Mental status and interview: very good.

Psychological Testing

HAM-D and HAM-A rating scales, PTSD scale (PDS) and Pathological Grief screening questionnaires were administered.

The Hamilton Depression rating scale (also known as the Ham-D) is the most widely used clinician-administered depression assessment scale. The original version contains 17 items (HDRS17) relating to symptoms of depression experienced over the past week.

The **Post-Traumatic Stress Diagnostic Scale (PDS)** is a 49-item self-report measure used in clinical or research settings to measure severity of Post-traumatic Stress Disorder (PTSD) symptoms related to a single identified traumatic event. The PDS has four sections. Part 1 is a trauma checklist. In Part 2, those completing the scale are asked about this most disturbing traumatic event including when it happened, if anyone was injured, perceived life threat, and whether the event resulted in helplessness or terror. Part 3 evaluates 17 PTSD symptoms. Respondents are asked to rate the severity of the symptom from 0 ("not at all or only one time") to 3 ("5 or more times a week / almost always"). Part 4 assesses influence of the symptoms in their lives.

A semi-structured interview format to facilitate assessment of complicated grief, developed by Shear et al., was administered (**Interview Guide for Complicated**

Grief). This is a screening rating scale with two Parts (A and B). The first section requires at least one of 4 symptoms to be endorsed indicating experience over the past month. The second section requires at least two of 8 symptoms to be endorsed. In addition, the **Brief Grief Questionnaire** developed by Shear and Essock was administered consisting of 5 screening questions (0-2) for Complicated Grief disorder.

Scores indicate presence of mild depression (score of 13 on the Ham-D), borderline anxiety (score of 12 on the Ham-A), moderate PTSD (score of 19 on the PDS) and presence of pathological/complicated grief (2 of 4 on Part A, 5 of 8 on Part B; Score of 5 on Brief Grief Questionnaire). Please see attached documents with detailed scoring.

Report of Psychologist Dr Norman Blumenthal

Reports that on October 28 while he was on a visit to Israel, he met for close to two hours with Chaya Zissel's parents and grandparents to therapeutically assist them with their trauma reactions and grief. He reports that the grandparents (Including Sara Halperin), who were seen separately, were also assisted in clarifying their roles as providers of support and sympathy while maintaining optimal and therapeutic levels of discretion and independence.

Summary of Observations

Sara Halperin is a 72-year-old female with signs and symptoms of partial PTSD and pathological/complicated grief since her 3-month old granddaughter died following a terror attack during which she was run over and killed. The loss of her granddaughter in such a sudden and violent manner led to her experiencing a great deal of anxiety and emotional pain which was confounded by the pain seeing how her daughter suffered with the loss of her first and only child.

Prognosis

Sara Halperin suffered intense emotional pain and chronic anxiety following the loss of her granddaughter in a terror attack in 2014. She clearly expresses how she believes her life has been irreversibly affected in light of the experience and her loss. It is not expected that her feelings of grief and worry affecting many areas of her

personal and interpersonal functioning will resolve in the short term, and they will continue to affect her indefinitely.

Diagnostic Formulation

309.89 (F43.8) Persistent Complex Bereavement Disorder; (moderate) with traumatic bereavement

309.81 (F43.10) Post-traumatic Stress Disorder (partial)



Rael Strous MD

Attachments: HAM-D rating scale results

HAM-A rating scale results

PDS scale

Pathological Grief Screening (Interview Guide for Complicated Grief, Brief Grief Questionnaire)

Curriculum Vitae (Rael Strous MD)

Curriculum Vitae: Rael D. Strous MD

PO Box 1, Beer Yaakov, 70350, Israel

Tel: 972-544628254

Email: rael@post.tau.ac.il

Current Title and Affiliation:

Director Chronic Inpatient Unit, Beer Yaakov Mental Health Center

Associate Professor, Department of Psychiatry, Sackler Faculty of Medicine, Tel Aviv University

EDUCATION

- 1984 – 1989 Medical School, *University of Witwatersrand*, Johannesburg, South Africa, MBBCh
 1992 – 1996 Psychiatry residency, *Albert Einstein College of Medicine*, New York (USA Board Certification)
 1996 – 1998 Clinical Research Fellowship in Psychopharmacology, Massachusetts Mental Health Center, *Harvard Medical School*, Boston, USA

ADDITIONAL STUDIES

- 1987-1989 Psychology, Theological Bioethics, University of South Africa, Pretoria, South Africa
 1996 Neuroimaging Mini-Fellowship, Columbia University, NY, USA
 1995 Board Certification Forensic Examination, American College of Forensic Examiners

PROFESSIONAL EXPERIENCE

- 1990 Internship, Hillbrow Hospital, Medicine, Surgery, Johannesburg, South Africa
 1991 Alexandra Health Center, Ambulatory Med., General physician, Johannesburg, South Africa
 1991 Johannesburg General Hospital, Emergency Room MD
 1992-1996 Psychiatry Resident, **Albert Einstein College of Medicine**, Bronx Municipal Hospital, North Central Bronx Hospital, Montefiore Hospital (Chief Resident Bronx Psychiatric State 1995/6)
 1996-1998 Research Fellow, Commonwealth Research Center, Massachusetts Mental Health Center, **Harvard Medical School**
 1999–present Beer Yaakov Mental Health Center, Director Chronic Inpatient Unit (from 2003)
 2001-present Sackler Faculty of Medicine, Tel Aviv University Lecturer and Tutor
 Medical Students in Psychiatry
 2002-2006 Member Physician Committee, Beer Yaakov Mental Health Center Psychiatry
 2002-present Chairman Medication Committee, Beer Yaakov Mental Health Center
 2003-2006 Israel Society of Biological Psychiatry, Executive Board Member
 2003-2006 Israel Society of Biological Psychiatry Annual Conference Committee Member
 2004-present World Psychiatry Association (WPA) Section on Religion Committee Member
 2005-2006 World Psychiatry Association (WPA) Section, Committee Member
 on Law and Psychiatry
 2006, 2009, 2011 Israel Psychiatry Association Annual Congress, Scientific Organization Committee Member
 2005-2010 Member Clinical Teaching Committee, Sackler Faculty of Medicine, Tel Aviv University

ACADEMIC AND RESEARCH ACTIVITIES, SACKLER FACULTY OF MEDICINE

2009-2010: Director, New York State/American Program, Sackler Faculty of Medicine, Tel Aviv University
 2008-2010 Member Medical School Curriculum Committee
 2008-2010 Member Four Year Medical School Program Steering Committee
 2003-present: Member Medical School Admissions Evaluation Team
 2003-2008: Coordinator medical student exam in psychiatry (USA and Israeli medical students)
 2003-2006: Executive Board Member, Israel Society of Biological Psychiatry
 2005-present Member Editorial Board: Law and Medicine Journal
 2005-2010: Member Clinical Teaching Committee, Sackler Faculty of Medicine
 2006-present: Deputy Editor, Israel Journal of Psychiatry
 2008-2010: Member Planning Committee for four-year medical degree, Sackler Faculty of Medicine

ACADEMIC AND PROFESSIONAL AWARDS

1988 Alice Cox Award, Best medical student in psychiatry, University Witwatersrand Medical School
 1992-5 Top psychiatric resident in annual national PRITE examination, Department of Psychiatry
 Albert Einstein College of Medicine (top 1% of all USA psychiatry residents)
 1994/95 Burroughs Wellcome Leadership Award, American Medical Association (AMA)
 1994/95 Mead Johnson Fellowship Award, American Psychiatric Association (APA)
 1995 Young Investigator Award International Congress on Schizophrenia Research, USA
 1995 Lilly Resident Research Award, American Psychiatric Association (APA)
 1995/96 Young Scientist Award, 8th Biennial Winter Workshop on Schizophrenia (Switzerland)
 1996 Young Investigator Award, Society of Biological Psychiatry
 1996/7 Young Researcher Award, American Neuropsychiatric Association
 1996 Dupont-Warren Fellowship Award, Department of Psychiatry, *Harvard Medical School*
 1996 New Investigator Award (NCDEU)/National Institute Mental Health, USA (NIMH)
 2000 Rafaelsen Fellowship Award, Collegium Internationale Neuropsychopharmacologicum (CINP)
 2001 Fellowship Award, World Congress of Biological Psychiatry
 2002 Fellowship Award, European College of Neuropsychopharmacology (ECNP)
 2002 Team Award for Best Research Paper, Israel Psychiatry Association
 2002 Clinical Research Award: Best Clinical Research Paper, Israel Society of Biological Psychiatry
 2004 Outstanding Young Investigator Award, International Congress of Biological Psychiatry
 2004 Donald Cohen Fellowship Award, International Association of Child Psychiatry and Allied
 Professions (IACAPAP)
 2004 **Outstanding Teacher/Lecturer of the Year**, Sackler Faculty of Medicine, Tel Aviv University
 2006 Certificate of Honor (research presentation), Israel Society for Biological Psychiatry
 2007 **Outstanding Teacher/Lecturer of the Year**, Sackler Faculty of Medicine, Tel Aviv University
 2010 **Immigrant Scientist Recognition Award** from Israel Ministry of Immigration
 2010 **Outstanding Employee of Year**, Beer Yaakov Mental Health Center

GRANTS AWARDED

2000 Ministry Of Science: Chief Scientist Award, PRINCIPAL INVESTIGATOR, Clinical study of first-episode psychosis
 2000 Israel Institute of Psychobiology Grant, PRINCIPAL INVESTIGATOR, Functional MRI investigation in first-episode schizophrenia
 2000 Guggenheim Foundation Grant, PRINCIPAL INVESTIGATOR, Genetic polymorphisms in violence and aggression
 2000 Israel Ministry Of Defense Research Grant, PRINCIPAL INVESTIGATOR, Novel pharmacological management of treatment resistant PTSD

- 2000 NARSAD Young Investigator Award, PRINCIPAL INVESTIGATOR, Novel augmentation strategies with neurosteroids in schizophrenia
- 2002 Stanley Foundation Grant, CO- PRINCIPAL INVESTIGATOR, Neurosteroids in schizophrenia
- 2002 India-Israel Research Project, CO-INVESTIGATOR, Genetics of Schizophrenia
- 2002 Dreyfuss Health Foundation, PRINCIPAL INVESTIGATOR, Treatment resistant schizophrenia
- 2003 Stanley Foundation Grant, PRINCIPAL INVESTIGATOR, Methyl donors in schizophrenia
- 2003 NARSAD Young Investigator Award, PRINCIPAL INVESTIGATOR, Neurosteroids and management of treatment resistance and medication related side-effects in schizophrenia
- 2007 Mordechai Ofer Research Award Grant, Tel Aviv University, PRINCIPAL INVESTIGATOR, Psychiatry during the Nazi era, its relevance today and ethical ramifications for current practice

MEMBERSHIP IN PROFESSIONAL SOCIETIES

- 2003-present World Society of Biological Psychiatry
- 2003 International Group Therapy Association
- 2001-present European College of Neuropsychopharmacology (ECNP)
- 1999-present Israel Medical Society
- 1999-present Israel Psychiatric Association
- 1999-present Israel Society for Biological Psychiatry
- 1996 American College of Forensic Examiners
- 1996-8 Massachusetts Society of Medicine, USA
- 1994-8, 2006 International Society of Political Psychology
- 1992-1998 American Psychiatric Association
- 1990 South African Medical & Dental Council
- 1990 General Medical Council (Great Britain)

ACTIVE PARTICIPATION IN SCIENTIFIC MEETINGS (Poster or Lecture presentation)

- 1992 American Psychiatric Association, USA
- 1993 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Conference of Political Psychology, Boston, USA
Institute of Psychiatric Services, San Diego, USA
- 1994 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Congress on Schizophrenia Research, Colorado, USA
Institute of Psychiatric Services, Boston, USA
- 1995 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Congress on Schizophrenia Research, Switzerland
New Clinical Drug Evaluation Unit (NCDEU), Boca Raton, USA
American Neuropsychiatric Association, Orlando, USA
- 1996 American Psychiatric Association, USA
- 1997 Society of Biological Psychiatry, Kfar Giladi, Israel
- 1998 Israel Society of Neuroscience, Eilat, Israel
IBRO, International Brain Research Organization, Jerusalem, Israel
- 1999 CINP, Brussels, Belgium

- Israel Psychiatry Association, Jerusalem, Israel
 Israel Society of Neuroscience, Eilat, Israel
- 2001 American Psychiatric Association, New Orleans, USA
 World Congress Biological Psychiatry, Berlin, Germany
- 2002 Association of European Psychiatrists, Stockholm, Sweden
 ECNP, Barcelona Spain
 Pharmacogenetics, Mayo Clinic, Minnesota, USA
- 2003 European Conference on Violence in Clinical Psychiatry, London, England
 ACNP, Puerto Rico, USA
- 2004 International Congress of Biological Psychiatry
 Society of Biological Psychiatry, Hagoshrim, Israel
 International Congress of Neuropsychiatry, Athens, Greece
- 2005 Society of Biological Psychiatry, Hagoshrim, Israel
 International Conference on Medical Ethics, Haifa
 American Psychiatric Association, Atlanta, USA
 World Congress Biological Psychiatry, Vienna, Germany
- 2006 Nefesh Israel, Jerusalem (**Lecturer**)
 Society of Biological Psychiatry, Hagoshrim, Israel (**Lecturer**)
 Israel Psychiatry Association, Tel Aviv (**Lecturer**)
 International Society of Political Psychology, Barcelona, Spain (**Lecturer**)
 World Association Medical Law, Toulouse, France (**Lecturer**)
 ECNP (European College Neuropsychopharmacology) Paris, France
- 2007 Society of Biological Psychiatry, Hagoshrim, Israel (**Lecturer**)
 World Psychiatry Association: Coercive Treatment in Psychiatry, Dresden, Germany
(Lecturer)
- 2008 Society of Biological Psychiatry, Israel
- 2009 Nahariah Conference on Holocaust (**Lecturer**)
 Israel Medical Association Conference (**Lecturer**)
 Brother-Other: Israel/Poland Mental Health Association, Krakow, Poland (**Lecturer**)
- 2010 CINP, Hong Kong (**Lecturer**)
 Society for International Research of Schizophrenia (SIRS), Florence, Italy (**Lecturer**)
 International Conference on 'Integrating Traditional Healing Practices into Counseling
 Psychology, Psychotherapy and Psychiatry.' Durban, South Africa, (**Lecturer**)
- 2011 International Conference, Medical Ethics, Bochum, Germany (**Lecturer**)
 International Conference for Clinical Ethics and Consultation, Amsterdam, Holland
(Lecturer)
 ECNP, Paris, France (**Lecturer**)

REVIEWER FOR FOLLOWING JOURNALS:

Archives of General Psychiatry, American Journal of Psychiatry, British Journal of Psychiatry,
 Neuropharmacology, Journal of Medical Ethics, European Journal of Neuropsychopharmacology,
 Journal of Nervous and Mental Disorders, Psychiatry Research, Schizophrenia Research, Biological
 Psychiatry, Schizophrenia Bulletin, Israel Journal of Psychiatry, Israel Medical Association Journal

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15. **Strous RD**, Maayan R, Lapidus R, Stryjer R, Lustig M, Kotler M, Weizman A Value of Dehydroepiandrosterone (DHEA) Augmentation in the Management of Negative Symptoms in Schizophrenia Archives of General Psychiatry 2003;60:133-141
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EXHIBIT 14

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
SHMUEL ELIMELECH BRAUN, et. al.)	
)	
Plaintiff,)	Civ. No. 1:15-cv-01136-BAH
)	
v.)	
)	
THE ISLAMIC REPUBLIC OF IRAN, et al.,)	
)	
Defendants.)	
_____)	

EXPERT DECLARATION OF DR. RAEL STROUS

Re: Murray Braun

I have been retained by the Plaintiffs in the matter of *Braun v. The Islamic Republic of Iran* to provide a report and testimony regarding the mental health of Murray Braun.

Professional Qualifications

1. I am a Medical Doctor specializing in psychiatry. I am currently employed as the Deputy Hospital Director and Director of the Ambulatory Service of the Be'er Yaakov Mental Health Center located in Be'er Yaakov, Israel. I also serve as Full Professor, Department of Psychiatry at the Sackler Faculty of Medicine at the Tel Aviv University and maintain a small private practice in clinical psychiatry.

2. I received my medical degree in 1989 from the University of Witwatersrand in Johannesburg, South Africa. Between 1992 and 1996, I performed my residency in psychiatry at the Albert Einstein College of Medicine in the Bronx, New York. In 1996, I served as Chief Resident at the Bronx Psychiatric State Hospital. From 1996 through 1998, I performed a

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Re. Murray Braun

24 May 2016

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clinical research fellowship in psychopharmacology at the Commonwealth Research Center, Massachusetts Mental Health Center affiliated with the Harvard Medical School.

3. Before embarking on my career in psychiatry, I served as an emergency room doctor and as a general physician in pediatrics and trauma.

4. I have approximately 150 peer reviewed research publications to my name including several in the field of chronic post-traumatic stress disorder (PTSD).

5. Based on my education and experience as outlined above, I have provided expert reports that were submitted as exhibits in *Biton v. The Palestinian Interim Self-Government Authority, et al.*, 01 CV 382 (RWR), *Gilmore v. The Palestinian Interim Self-Government Authority et al.*, 01-cv-00853 (GK), *Rubin v. Islamic Republic of Iran_01-1655* (RCL), *Ben Haim v. Islamic Republic of Iran*, 02-01811 (RCL) and *Kaplan v. Hezbollah, et al.*, No. 09-cv-646 (RWR) in the United States District Court for the District of Columbia, *Leibovitch v. The Syrian Arab Republic et al.*, 08 CV 01939 (WTH) in the United States District Court for the Northern District of Illinois, and in *Shatsky v. The Syrian Arab Republic et. al.*, 02-2280-RJL in the United States District Court of the District of Columbia. I testified at a deposition in, *SapErstein v. Palestinian Authority*, Case No. 0420225-CIV-Turnoff in the United States District Court for the Southern District of Florida. I have testified as an expert at one trial *Sokolow vs Palestinian Liberation Organization et al.*, 04-CV-397(GBD). In Israel, I have also submitted court mandated evaluations of psychiatric patients.

6. A copy of my curriculum vitae including a list of all publications authored by me within the preceding ten years is attached hereto.

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7. I have been asked to provide an evaluation for Murray Braun. To prepare this evaluation, I examined Plaintiff Murray Braun on 11 May 2016. Upon examining Murray Braun, I prepared a written Psychiatric Evaluation for him. That written Psychiatric Evaluation represented my professional assessment of Murray Braun. Accordingly, I incorporate by reference into this report the Psychiatric Evaluation regarding Plaintiff Murray Braun dated 11 May 2016 (attached hereto).

Psychiatric Disorders

8. To facilitate understanding and analysis of the Psychiatric Evaluation, I am including a brief explanation of Persistent Complex Bereavement Disorder, Post-traumatic Stress Disorder and Persistent Depressive Disorder which afflicts Murray Braun as indicated in his Psychiatric Evaluation.

Persistent Complex Bereavement Disorder

9. Persistent Complex Bereavement Disorder (also known as Pathological Grief or Complicated Mourning) refers to a description of the normal mourning process that leads to chronic or ongoing mourning. The term "Pathological Grief" is applied to people who are unable to get over their grief despite the passage of time. It can take most people up to several years to get past a serious loss especially when the loss is associated with a violent and unexpected death. The person may experience intrusive distressing preoccupation with the deceased and wish to be reunited with the deceased. They may feel a sense of futility about the future, difficulty acknowledging the death, excessive irritability, bitterness or anger about the unfairness of the death and most significantly impaired social/occupational functioning. A pathological grief

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reaction is usually diagnosed after a long time (one or more years) have passed and the grieving person is not improving.

Post-Traumatic Stress Disorder

10. Post-Traumatic Stress Disorder (“PTSD”) is a condition which develops from having been exposed to, or witnessing, life-threatening events. In addition, the traumatic event may be indirect, by hearing of a relative or close friend who has experienced the life threatening event. Indirectly experienced death must be accidental or violent. PTSD is characterized by distinct types of symptoms. These symptoms include avoidance, re-experiencing the event, and hyper-vigilance. Avoidance is the active escape from situations that the PTSD victim associates with the event. Re-experiencing is reliving the memory of the event. Hypervigilance is a cluster of symptoms that includes exaggerated startle response, inability to fall asleep and inability to stay asleep.

11. The disorder is also characterized by negative alterations in mood or cognitions which indicates a decline in someone’s mood or thought patterns. This can include memory problems that are exclusive to the event, negative thoughts or beliefs about one’s self or the world, distorted sense of blame for one’s self or others, related to the event, being stuck in severe emotions related to the trauma (e.g. horror, shame, sadness), severely reduced interest in pre-trauma activities and feeling detached, isolated or disconnected from other people.

12. Due to their suffering and symptoms, educational and employment prospects for PTSD victims are often lowered. Some have difficulty interacting with others.

13. Younger victims and females may be more likely to be susceptible to PTSD.

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14. Overall effects on PTSD patients from this illness are severe. Patients are easily distractible due to their exaggerated response to stimuli. Individuals face considerably lowered employment prospects and increased likelihood of difficulty in forming and maintaining interpersonal relationships. For those who are married or who are able to marry and have children the stress of childrearing will be compounded. The inability to relax and have a good time is extremely common with PTSD patients.

Persistent Depressive Disorder (Dysthymic Disorder)

15. Persistent Depressive Disorder (previously known as Dysthymic Disorder) is a chronic (long-lasting), mild form of depression. However, calling it "mild" is misleading; because it can last for years and it can be just as debilitating as a more acute episode of major depression (clinical depression), even leading to thoughts of, or attempts at, suicide. Many of the symptoms of dysthymia are the same as those of major depression; however, they may be less severe or intense. Dysthymia also has some symptoms that may not occur with major depression. The hallmark of dysthymia is the length of time that it persists. In adults, dysthymia is diagnosed when the symptoms continue for two or more years; in children or teens, the symptoms last for a year or more. Dysthymia is a serious condition that needs to be treated. Dysthymia may include the experience of the following symptoms: sad mood, difficulty falling sleeping (or sleeping too much), increased or decreased appetite or weight, feelings of worthlessness, feelings of hopelessness, thoughts of suicide, anxiety, decreased motivation, loss of interest (anhedonia), irritability or anger, restlessness (especially in children) and vague physical symptoms.

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16. Murray Braun displays some form of Persistent Complex Bereavement Disorder, Post-traumatic Stress Disorder and Persistent Depressive Disorder either currently or in the past as a result of his granddaughter being killed in a terror attack in 2014.

17. Based on my evaluation of Murray Braun, I believe that many of his symptoms with which he has been diagnosed are likely to be present in varying degrees for a significant time to come and while it is impossible to state for any absolute certainty, many of the symptoms may even be permanent.

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

Dated: 24 May 2016

A handwritten signature in black ink, appearing to read "R. Strous", is written over a light yellow rectangular background.

Rael Strous, MD

Rael Strous MD

Psychiatrist

PO Box 940, Beit Shemesh 9910901, Israel

Tel: 972-544-628254

Email: rael@post.tau.ac.il

USA Board Certified Psychiatrist

Israel Medical License: 31932

Israel Psychiatry License: 17270

11 May 2016

Psychiatric Evaluation: Murray Braun

Date of Birth: REDACTED

This evaluation is based on clinical interview and formal psychiatric evaluation, as well as my review of the discovery materials in this case as listed in my introduction. My opinions are stated within a reasonable degree of medical certainty.

Identifying Information

Murray Braun is a 63-year-old male USA citizen currently residing in Los Angeles, USA. He was born in Brooklyn, New York and moved to Los Angeles in May 1976 where he has lived ever since. He is the father of 5 children. He works in a vending machine company.

Presenting Problem

On that "fateful" day of October 22, 2014, Mr. Braun remembers vividly being at work in his warehouse when he was called by his wife to come home urgently. She told him that his son and granddaughter were hurt badly and that he should come home straight away. When he arrived home, his daughter in law called and told them that there had been an "accident". He immediately went to his computer and opened

up the "yeshiva-world" website. There it was reported that a 3 month old baby had been killed by terrorists. He then remembers total "chaos and havoc" in the house. He could not believe that this was going on and happening to him and his family. He was then called by his daughter in law's father who informed him officially that their granddaughter had "passed away". In addition, he was told that his son was injured – however he did not know how badly he was injured. This "unknown" only compounded his anxiety and distress.

Mr. Braun recalls how for him the shock was indescribable that the feeling was terrifying. He informs that this son was his youngest son and the "apple of his eye". He was very close to this son; however he still had not had the opportunity to travel to Israel and to hold his baby granddaughter in his arms who was the first child of his son. The thought of not ever holding her and experiencing his son as a father to this child was heart-wrenching for him. He states that even though he knows that these kinds of things happen in this world, it's still hard to believe; but these things do not happen to him and his family! He felt as if the wind had been knocked out of him. The pain for him was a real sensation of hurt. The senselessness of the event and loss was unbearable for him as he describes it.

Even though the acute shock wore off, he still found the loss unreal. He remained in a kind of denial for some time due to the immense pain and shock of the experience. He remembers that people came to visit from all over. He was called by so many people including the consulate who called to comfort him. In addition, he was visited by local politicians, rabbis, friends etc. All this time he still could not believe that this was happening to him. He kept on saying to himself and those around him "why did this have to happen, why did this have to happen?"

Although it was comforting to have so many visitors and calls, he felt like he needed to be alone. He made reservations to leave for Israel to be with his injured son. After going online, he arranged a flight at around 5pm. He arrived in Israel about 27 hours later. This was in the middle of the night. He was driven to Jerusalem in a very tired state. He remembers that he had to calm down his son and daughter in law. They were understandably very traumatized and emotional. Even though they were obviously in a great deal of pain, he had to ask himself based on his tremendous overwhelming

agony over the situation, who was hurting more? He felt that what was doubly painful for him was both the loss of his granddaughter as well as seeing his son suffering so much. To see his son sitting *Shiva* (traditional 7 day mourning period) was heart wrenching for him.

He recalls that after his son was discharged from the hospital, someone was sent from the hospital to change his bandages and check his wound. The *Shiva* he reports took every ounce of "energy/breath" out of him. It was excruciatingly painful for him to see how his son and daughter in law suffered during this time. He felt that they are young "innocent kids". Why should they suffer so much?

Long-term Physical and Psychological Repercussions Following the Event

In the long term, he reports that he was affected negatively in various ways. He is "just not the same person". These changes include the following:

1. He misses his granddaughter – even though up until then he had never actually held her. He knows that in some way this does not make sense, however he really feels the loss.
2. His relationship changed with his son and daughter in law in that he had to relate to them in a different manner.
3. He gets pained whenever he sees babies of similar age. This is how life should be he feels, not what he experienced.
4. He still is constantly trouble by "why" questions. This includes most recently, "why was I not robbed?" Why did this baby and her parents and family have to suffer so much?
5. He feels like a "pin was placed into him and all the air flowed out". He thus feels that he is not the same person anymore despite the time since the loss.
6. Socially he feels his life has changed for the worse. He feels that wherever he goes, he is seen as the grandfather of the terror victim baby. For the first few months after the loss, he was not able to go out to public places. He felt so much hurt at the time that he did not want to talk about it and explain to others about the trauma he had experienced. Furthermore, he did not want to feel that people had pity for him. The constant attention that he felt from people was

very difficult for him. He did what he could to shy away from this. This in itself affected his social life adversely.

7. He feels that he has become an angry and upset individual. He feels that this is a major change in his personality that has taken place since the loss. Much of this is related to the feeling of the senseless nature of the loss. He ultimately feels very much challenged by the situation and is not able to overcome the effects that it had on him long term. This is also related to the fact that over the past 18 months he has become much more short tempered. He believes that he is not as cool and calm as he was before. Instead he has become more tense and nervous. He tries at times to "walk around the block" when he gets particularly tense – this tends to help a little.

Post-traumatic symptoms:

1. Reports occasional flashbacks – less though than in the beginning. These flashbacks occur when he is sitting on the couch and suddenly the situation vividly comes to his mind.
2. Flashbacks also occur when he is watching the news or the occasional movie and some form of violence is depicted. In such situations, he almost inevitably experiences a flashback to the terror event where what happened and the subsequent loss flash in his mind again and again. Flashbacks also take the form of the flight to Israel and seeing the picture of his deceased grandchild on the front page of numerous newspapers. He remembers very clearly how "everyone on the fight was talking about Chaya Zissel". He reports that the loss of such a young innocent life touched many in the USA and around the world.
3. His sleep to this day remains restless. He feels that despite the time, this has not improved and that he is now destined to have his sleep affected in this adverse manner forever.
4. If he hears screeching of a car, he gets petrified. This began during the *Shiva* (traditional 7 days of mourning) when he was walking in the street and felt that a car was coming straight for him. He knows that the hypersensitivity that he has developed for passing cars developed at the time after the terror attack.
5. He reports that he has become hypervigilant when he is in public places.

Since the loss of his grandchild and many of the problems he was experiencing as a result, he spoke to a psychologist Dr Raizel Rubin in Los Angeles a few times. This is addition to speaking to local Rabbis for support and inspiration as well as speaking to the trauma specialist Dr Norman Blumenthal a few times early on after the tragedy. He was told to use sleeping tablets and medications for relaxing; however he was reluctant to start with medications and thus never took pharmaceutical agents to assist him in the above problems.

Mr. Braun indicates that he remains still "very angry and very hurt". He knows that his granddaughter has become a mere statistic and that this is difficult for him. He knows now that one never knows what "curveball" life is going to throw you. This trauma he knows though will always be with him as long as he lives.

Previous Psychiatric Illnesses

Mr. Braun reports no psychiatric history of any type prior to the terror event.

Alcohol or Substance History

He reports no use of any drugs or smoking.

Current Medical Illnesses

Denies any medical problems of significance.

Family Psychiatric History

None reported

Mental Status

General appearance: Dressed casually in orthodox Jewish clothing.

Behavior: Open, appeared to relax more as the discussion progressed. Initially hesitant to open up and share emotional traumatic experience.

Affect: Clear emotion expressed when discussing the effect the traumatic experience had on his life. Obvious frustration when sharing how his life was affected (for no reason so suddenly as he sees it).

Mood: Admits to anger, frustration, irritability, low mood even since the event.

Speech: Clear and coherent

Thought disorder: No evidence of formal thought disorder.

Thought Content: No evidence of delusional content.

Perceptual Disorder: No evidence of past or present hallucinations. No evidence of psychosis.

Neurocognitive and neuropsychiatric status: fully alert and oriented. Concentration and attention ability is intact.

Impulse Control: Intact.

Insight: Good.

Judgment: Good.

Reliability of Mental status and interview: very good.

Psychological Testing

HAM-D and HAM-A rating scales, PTSD scale (PDS) and Pathological Grief screening questionnaires were administered.

The Hamilton Depression rating scale (also known as the Ham-D) is the most widely used clinician-administered depression assessment scale. The original version contains 17 items (HDRS17) relating to symptoms of depression experienced over the past week.

The **Post-Traumatic Stress Diagnostic Scale (PDS)** is a 49-item self-report measure used in clinical or research settings to measure severity of Post-traumatic Stress Disorder (PTSD) symptoms related to a single identified traumatic event. The PDS has four sections. Part 1 is a trauma checklist. In Part 2, those completing the scale are asked about this most disturbing traumatic event including when it happened, if anyone was injured, perceived life threat, and whether the event resulted in helplessness or terror. Part 3 evaluates 17 PTSD symptoms. Respondents are asked to rate the severity of the symptom from 0 ("not at all or only one time") to 3 ("5 or more times a week / almost always"). Part 4 assesses influence of the symptoms in their lives.

A semi-structured interview format to facilitate assessment of complicated grief, developed by Shear et al., was administered (**Interview Guide for Complicated**

Grief). This is a screening rating scale with two Parts (A and B). The first section requires at least one of 4 symptoms to be endorsed indicating experience over the past month. The second section requires at least two of 8 symptoms to be endorsed. In addition, the **Brief Grief Questionnaire** developed by Shear and Essock was administered consisting of 5 screening questions (0-2) for Complicated Grief disorder.

Scores indicate presence of mild depression (score of 9 on the Ham-D), moderate PTSD (score of 22 on the PDS) and presence of pathological/complicated grief (2 of 4 on Part A, 6 of 8 on Part B; Score of 7 on Brief Grief Questionnaire). Please see attached documents with detailed scoring.

Report of Psychologist Dr Norman Blumenthal

Reports that on October 28 while he was on a visit to Israel, he met for close to two hours with Chaya Zissel's parents and grandparents to therapeutically assist them with their trauma reactions and grief. He reports that the grandparents (Including Murray Braun), who were seen separately, were also assisted in clarifying their roles as providers of support and sympathy while maintaining optimal and therapeutic levels of discretion and independence.

Summary of Observations

Murray Braun is a 63-year-old male with signs and symptoms of partial PTSD and pathological/complicated grief since his 3-month old granddaughter died following a terror attack during which she was run over and killed. Mr. Braun clearly describes how his life has been affected in terms of mood, frustration, irritability and overall quality of life satisfaction. In addition, it is clear that his social life has been affected as a direct result of his personal trauma over the event.

Prognosis

Murray Braun experienced significant grief and pain since the terror event in which his 3 month old granddaughter was killed. His trauma was compounded by the fact that his son and daughter in law also suffered as well as by the fact that he never had an opportunity to ever hold this child. In addition to his personal trauma and grief, his social function appears to have been adversely affected. Mr. Braun strongly believes

that his life will never return to how it was before and that he will never get over the tragedy and loss. It is thus not expected that his subjective feelings of grief and mood changes affecting many areas of his personal and interpersonal functioning will resolve in the short term, and they will continue to affect him indefinitely.

Diagnostic Formulation

309.89 (F43.8) Persistent Complex Bereavement Disorder; (moderate) with traumatic bereavement

300.4 (F34.1) Persistent Depressive Disorder; mild severity, late onset

309.81 (F43.10) Post-traumatic Stress Disorder (partial)



Rael Strous MD

Attachments: **HAM-D rating scale results**

PDS scale

Pathological Grief Screening (Interview Guide for Complicated Grief, Brief Grief Questionnaire)

Curriculum Vitae (Rael Strous MD)

Curriculum Vitae: Rael D. Strous MD

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Current Title and Affiliation:

Director Chronic Inpatient Unit, Beer Yaakov Mental Health Center

Associate Professor, Department of Psychiatry, Sackler Faculty of Medicine, Tel Aviv University

EDUCATION

- 1984 – 1989 Medical School, *University of Witwatersrand*, Johannesburg, South Africa, MBBCh
 1992 – 1996 Psychiatry residency, *Albert Einstein College of Medicine*, New York (USA Board Certification)
 1996 – 1998 Clinical Research Fellowship in Psychopharmacology, Massachusetts Mental Health Center, *Harvard Medical School*, Boston, USA

ADDITIONAL STUDIES

- 1987-1989 Psychology, Theological Bioethics, University of South Africa, Pretoria, South Africa
 1996 Neuroimaging Mini-Fellowship, Columbia University, NY, USA
 1995 Board Certification Forensic Examination, American College of Forensic Examiners

PROFESSIONAL EXPERIENCE

- 1990 Internship, Hillbrow Hospital, Medicine, Surgery, Johannesburg, South Africa
 1991 Alexandra Health Center, Ambulatory Med., General physician, Johannesburg, South Africa
 1991 Johannesburg General Hospital, Emergency Room MD
 1992-1996 Psychiatry Resident, **Albert Einstein College of Medicine**, Bronx Municipal Hospital, North Central Bronx Hospital, Montefiore Hospital (Chief Resident Bronx Psychiatric State 1995/6)
 1996-1998 Research Fellow, Commonwealth Research Center, Massachusetts Mental Health Center, **Harvard Medical School**
 1999–present Beer Yaakov Mental Health Center, Director Chronic Inpatient Unit (from 2003)
 2001-present Sackler Faculty of Medicine, Tel Aviv University Lecturer and Tutor
 Medical Students in Psychiatry
 2002-2006 Member Physician Committee, Beer Yaakov Mental Health Center Psychiatry
 2002-present Chairman Medication Committee, Beer Yaakov Mental Health Center
 2003-2006 Israel Society of Biological Psychiatry, Executive Board Member
 2003-2006 Israel Society of Biological Psychiatry Annual Conference Committee Member
 2004-present World Psychiatry Association (WPA) Section on Religion Committee Member
 2005-2006 World Psychiatry Association (WPA) Section, Committee Member
 on Law and Psychiatry
 2006, 2009, 2011 Israel Psychiatry Association Annual Congress, Scientific Organization Committee Member
 2005-2010 Member Clinical Teaching Committee, Sackler Faculty of Medicine, Tel Aviv University

ACADEMIC AND RESEARCH ACTIVITIES, SACKLER FACULTY OF MEDICINE

2009-2010: Director, New York State/American Program, Sackler Faculty of Medicine, Tel Aviv University
 2008-2010 Member Medical School Curriculum Committee
 2008-2010 Member Four Year Medical School Program Steering Committee
 2003-present: Member Medical School Admissions Evaluation Team
 2003-2008: Coordinator medical student exam in psychiatry (USA and Israeli medical students)
 2003-2006: Executive Board Member, Israel Society of Biological Psychiatry
 2005-present Member Editorial Board: Law and Medicine Journal
 2005-2010: Member Clinical Teaching Committee, Sackler Faculty of Medicine
 2006-present: Deputy Editor, Israel Journal of Psychiatry
 2008-2010: Member Planning Committee for four-year medical degree, Sackler Faculty of Medicine

ACADEMIC AND PROFESSIONAL AWARDS

1988 Alice Cox Award, Best medical student in psychiatry, University Witwatersrand Medical School
 1992-5 Top psychiatric resident in annual national PRITE examination, Department of Psychiatry
 Albert Einstein College of Medicine (top 1% of all USA psychiatry residents)
 1994/95 Burroughs Wellcome Leadership Award, American Medical Association (AMA)
 1994/95 Mead Johnson Fellowship Award, American Psychiatric Association (APA)
 1995 Young Investigator Award International Congress on Schizophrenia Research, USA
 1995 Lilly Resident Research Award, American Psychiatric Association (APA)
 1995/96 Young Scientist Award, 8th Biennial Winter Workshop on Schizophrenia (Switzerland)
 1996 Young Investigator Award, Society of Biological Psychiatry
 1996/7 Young Researcher Award, American Neuropsychiatric Association
 1996 Dupont-Warren Fellowship Award, Department of Psychiatry, *Harvard Medical School*
 1996 New Investigator Award (NCDEU)/National Institute Mental Health, USA (NIMH)
 2000 Rafaelsen Fellowship Award, Collegium Internationale Neuropsychopharmacologicum (CINP)
 2001 Fellowship Award, World Congress of Biological Psychiatry
 2002 Fellowship Award, European College of Neuropsychopharmacology (ECNP)
 2002 Team Award for Best Research Paper, Israel Psychiatry Association
 2002 Clinical Research Award: Best Clinical Research Paper, Israel Society of Biological Psychiatry
 2004 Outstanding Young Investigator Award, International Congress of Biological Psychiatry
 2004 Donald Cohen Fellowship Award, International Association of Child Psychiatry and Allied
 Professions (IACAPAP)
 2004 **Outstanding Teacher/Lecturer of the Year**, Sackler Faculty of Medicine, Tel Aviv University
 2006 Certificate of Honor (research presentation), Israel Society for Biological Psychiatry
 2007 **Outstanding Teacher/Lecturer of the Year**, Sackler Faculty of Medicine, Tel Aviv University
 2010 **Immigrant Scientist Recognition Award** from Israel Ministry of Immigration
 2010 **Outstanding Employee of Year**, Beer Yaakov Mental Health Center

GRANTS AWARDED

2000 Ministry Of Science: Chief Scientist Award, PRINCIPAL INVESTIGATOR, Clinical study of first-episode psychosis
 2000 Israel Institute of Psychobiology Grant, PRINCIPAL INVESTIGATOR, Functional MRI investigation in first-episode schizophrenia
 2000 Guggenheim Foundation Grant, PRINCIPAL INVESTIGATOR, Genetic polymorphisms in violence and aggression
 2000 Israel Ministry Of Defense Research Grant, PRINCIPAL INVESTIGATOR, Novel pharmacological management of treatment resistant PTSD

- 2000 NARSAD Young Investigator Award, PRINCIPAL INVESTIGATOR, Novel augmentation strategies with neurosteroids in schizophrenia
- 2002 Stanley Foundation Grant, CO- PRINCIPAL INVESTIGATOR, Neurosteroids in schizophrenia
- 2002 India-Israel Research Project, CO-INVESTIGATOR, Genetics of Schizophrenia
- 2002 Dreyfuss Health Foundation, PRINCIPAL INVESTIGATOR, Treatment resistant schizophrenia
- 2003 Stanley Foundation Grant, PRINCIPAL INVESTIGATOR, Methyl donors in schizophrenia
- 2003 NARSAD Young Investigator Award, PRINCIPAL INVESTIGATOR, Neurosteroids and management of treatment resistance and medication related side-effects in schizophrenia
- 2007 Mordechai Ofer Research Award Grant, Tel Aviv University, PRINCIPAL INVESTIGATOR, Psychiatry during the Nazi era, its relevance today and ethical ramifications for current practice

MEMBERSHIP IN PROFESSIONAL SOCIETIES

- 2003-present World Society of Biological Psychiatry
- 2003 International Group Therapy Association
- 2001-present European College of Neuropsychopharmacology (ECNP)
- 1999-present Israel Medical Society
- 1999-present Israel Psychiatric Association
- 1999-present Israel Society for Biological Psychiatry
- 1996 American College of Forensic Examiners
- 1996-8 Massachusetts Society of Medicine, USA
- 1994-8, 2006 International Society of Political Psychology
- 1992-1998 American Psychiatric Association
- 1990 South African Medical & Dental Council
- 1990 General Medical Council (Great Britain)

ACTIVE PARTICIPATION IN SCIENTIFIC MEETINGS (Poster or Lecture presentation)

- 1992 American Psychiatric Association, USA
- 1993 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Conference of Political Psychology, Boston, USA
Institute of Psychiatric Services, San Diego, USA
- 1994 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Congress on Schizophrenia Research, Colorado, USA
Institute of Psychiatric Services, Boston, USA
- 1995 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Congress on Schizophrenia Research, Switzerland
New Clinical Drug Evaluation Unit (NCDEU), Boca Raton, USA
American Neuropsychiatric Association, Orlando, USA
- 1996 American Psychiatric Association, USA
- 1997 Society of Biological Psychiatry, Kfar Giladi, Israel
- 1998 Israel Society of Neuroscience, Eilat, Israel
IBRO, International Brain Research Organization, Jerusalem, Israel
- 1999 CINP, Brussels, Belgium

- Israel Psychiatry Association, Jerusalem, Israel
 Israel Society of Neuroscience, Eilat, Israel
- 2001 American Psychiatric Association, New Orleans, USA
 World Congress Biological Psychiatry, Berlin, Germany
- 2002 Association of European Psychiatrists, Stockholm, Sweden
 ECNP, Barcelona Spain
 Pharmacogenetics, Mayo Clinic, Minnesota, USA
- 2003 European Conference on Violence in Clinical Psychiatry, London, England
 ACNP, Puerto Rico, USA
- 2004 International Congress of Biological Psychiatry
 Society of Biological Psychiatry, Hagoshrim, Israel
 International Congress of Neuropsychiatry, Athens, Greece
- 2005 Society of Biological Psychiatry, Hagoshrim, Israel
 International Conference on Medical Ethics, Haifa
 American Psychiatric Association, Atlanta, USA
 World Congress Biological Psychiatry, Vienna, Germany
- 2006 Nefesh Israel, Jerusalem (**Lecturer**)
 Society of Biological Psychiatry, Hagoshrim, Israel (**Lecturer**)
 Israel Psychiatry Association, Tel Aviv (**Lecturer**)
 International Society of Political Psychology, Barcelona, Spain (**Lecturer**)
 World Association Medical Law, Toulouse, France (**Lecturer**)
 ECNP (European College Neuropsychopharmacology) Paris, France
- 2007 Society of Biological Psychiatry, Hagoshrim, Israel (**Lecturer**)
 World Psychiatry Association: Coercive Treatment in Psychiatry, Dresden, Germany
(Lecturer)
- 2008 Society of Biological Psychiatry, Israel
- 2009 Nahariah Conference on Holocaust (**Lecturer**)
 Israel Medical Association Conference (**Lecturer**)
 Brother-Other: Israel/Poland Mental Health Association, Krakow, Poland (**Lecturer**)
- 2010 CIMP, Hong Kong (**Lecturer**)
 Society for International Research of Schizophrenia (SIRS), Florence, Italy (**Lecturer**)
 International Conference on 'Integrating Traditional Healing Practices into Counseling
 Psychology, Psychotherapy and Psychiatry.' Durban, South Africa, (**Lecturer**)
- 2011 International Conference, Medical Ethics, Bochum, Germany (**Lecturer**)
 International Conference for Clinical Ethics and Consultation, Amsterdam, Holland
(Lecturer)
 ECNP, Paris, France (**Lecturer**)

REVIEWER FOR FOLLOWING JOURNALS:

Archives of General Psychiatry, American Journal of Psychiatry, British Journal of Psychiatry,
 Neuropharmacology, Journal of Medical Ethics, European Journal of Neuropsychopharmacology,
 Journal of Nervous and Mental Disorders, Psychiatry Research, Schizophrenia Research, Biological
 Psychiatry, Schizophrenia Bulletin, Israel Journal of Psychiatry, Israel Medical Association Journal

PUBLICATIONS (150 in Total)**Original Research Articles**

1. **Strous, RD.**, Cowan, N., Ritter, W., Javitt, D.C.
Auditory sensory (“echoic”) memory dysfunction in schizophrenia.
American Journal of Psychiatry;152:10, 1517-1519, 1995.
2. Javitt, D.C , **Strous, RD.**, Grochowski, S., Ritter, W, Cowan, N.
Impaired precision, but normal retention, of auditory sensory memory information in schizophrenia.
Journal of Abnormal Psychology;106:315-324, 1997.
3. **Strous RD.**, Bark N, Parsia S, Volavka J, Lachman H. M.
Analysis of a functional Catechol-O-Methyltransferase gene polymorphism in schizophrenia:
Evidence for association with aggressive and antisocial behavior.
Psychiatry Research;69:71-77, 1997.
4. **Strous RD.**, Bark N, Woerner M, Lachman HM.
Lack of an association of a functional Catechol-O-Methyltransferase gene polymorphism in
schizophrenia.
Biological Psychiatry;41:493-495, 1997.
5. Green AI, Zimmet S, **Strous RD.**, Schildkraut JJ.
Substance use disorder and schizophrenia: Do patients with schizophrenia have a reward deficiency
syndrome that can be ameliorated by clozapine.
Harvard Review of Psychiatry;6:289-296, 1999.
6. Zimmet SV, **Strous RD.**, Burgess ES, Kohnstamm S, Green AI.
Effects of clozapine on substance use in patients with schizophrenia and schizoaffective
disorder: a retrospective survey.
Journal of Clinical Psychopharmacology;20:94-8, 2000.
7. **Strous RD.** Shtain M, Oselka-Goren H, Lustig M, Stryjer R, Zerzion M, Baruch Y, Chelben J.
Anticipatory Reactions of Psychiatric Inpatients to the Year 2000.
Journal of Nervous and Mental Disease 2000;188:786-788.
8. Ilani T, Ben-Shachar D, **Strous RD.**, Mazor M, Sheinkman A, Kotler M, Fuchs S.
A novel peripheral marker for schizophrenia: Increased levels of D3 dopamine
receptor mRNA in blood lymphocytes.
Proceedings of the National Academy of Sciences (PNAS), USA 2001, 98:625-8.
9. **Strous RD.** Spivak B, Yoran-Hegesh R, Maayan R, Averbuch E, Kotler M, Mestor R,
Weizman A.
Analysis of neurosteroid levels in attention deficit hyperactivity disorder.
International Journal of Neuropsychopharmacology 2001 ;4:259-64
10. **Strous RD.** Pollack S, Robinson D, Sheitman B, Lieberman JA. Seasonal
Admission Patterns in First Episode Psychosis, Chronic Schizophrenia and Non-
Schizophrenic Psychoses
Journal of Nervous and Mental Diseases 2001;189:642-4.

11. Szeszko PR, **Strous RD**, Goldman RS, Ashtari M, Knuth KH, Lieberman JA, Bilder RM. Neuropsychological correlates of hippocampus volumes in first-episode schizophrenia. American Journal of Psychiatry 2002;159:217-26.
12. Segman RH, Heresco-Levy U, Yakir A, Goltser T, **Strous RD**, Greenberg D, Lerer B. Interactive effect of cytochrome P450 17 α -hydroxylase and dopamine D3 receptor gene polymorphisms on abnormal involuntary movements in chronic schizophrenia Biological Psychiatry. 2002;;51:261-3.
13. Green AI, Burgess ES, Zimmet SV, Dawson R, **Strous RD** Alcohol and Cannabis use in schizophrenia: Effects of risperidone vs. clozapine. Schizophrenia Research 2003;60:81-5.
14. Stryjer R, **Strous RD**, Bar F, Werber E, Shaked G, Buhiri Y, Kotler M, Weizman A, Rabey JM Beneficial effect of donepezil augmentation in the management of comorbid schizophrenia and dementia Clinical Neuropharmacology 2003;26:12-7
15. **Strous RD**, Maayan R, Lapidus R, Stryjer R, Lustig M, Kotler M, Weizman A Value of Dehydroepiandrosterone (DHEA) Augmentation in the Management of Negative Symptoms in Schizophrenia Archives of General Psychiatry 2003;60:133-141
16. Stryjer R, **Strous RD**, Shaked G, Bar F, Feldman B, Kotler M, Polak L, Rosenzweig S, Weizman A Amantadine as augmentation therapy in the management of treatment resistant depression. International Clinical Psychopharmacology 2003;18:93-6.
17. **Strous RD**, Stryjer R, Keret N, Bergin M, Kotler M Reactions of Psychiatric and Medical Inpatients to Terror and Security Instability in Israel Journal of Nervous and Mental Disorders 2003;191:126-129.
18. Shifman S, Bronstein M, Sternfeld M, Shalom A, Lev-Lehman E, Grisaru N, Karp L, Kotler M, Knobler HY, Reznik I, Schiffer R, Shinar E, Spivak B, **Strous RD**, Swartz-Vanetik M, Weizman A, Yakir B, Risch N, Zak NB, Darvasi A. A highly significant association between a COMT haplotypes and schizophrenia. American Journal of Human Genetics 2002 6:1296-302
19. Stryjer R, **Strous RD**, Bar F, Poyurovsky M, Weizman A, Kotler M Treatment of neuroleptic induced akathisia with the 5HT_{2a} antagonist trazodone. Clinical Neuropharmacology 2003;26:137-41.
20. **Strous RD**, Nolan K, Lapidus R, Saito T, Lachman HM Aggressive behavior in schizophrenia is associated with the low enzyme activity COMT polymorphism: A replication study. American Journal of Medical Genetics 2003;120:29-34.
21. Stopkova P, Saito T, Papolos DF, Stryjer R, **Strous RD**, Lachman HM Polymorphism screening of PIP5K2A: A candidate gene for 10p-linked psychiatric disorders American Journal of Medical Genetics 2003;123B:50-58.
22. Vered Y, Golubchik P, Mozes T, **Strous RD**, Nechmad A, Mester R, Weizman A, Spivak B. The platelet poor plasma 5-HT response to carbohydrate rich meal administration in adult autistic patients compared to normal controls.

Human Psychopharmacology 2003;18:395-9.

23. Perl O, Ilani T, **Strous RD**, Lapidus R, Fuchs S
The $\alpha 7$ Nicotinic Acetylcholine Receptor in Schizophrenia: Decreased mRNA Levels in Peripheral Blood Lymphocytes
FASEB Journal 2003;17:1948-1950.
24. Segman, R.H., Goltser, T., Heresco-Levy U., Finkel, B., **Strous, RD.**, Shalem, R., Schlafman, M., Yakir, A., Greenberg, D., Lerner, A., Shelevoy, A., Lerer, B.:
Association of dopaminergic and serotonergic genes with tardive dyskinesia in patients with chronic schizophrenia.
Pharmacogenomics J. 2003;3:277-83.
25. Maayan R, Spivak B, **Strous RD**, Nechmad A, Yoran-Hegesh R, Averbuch E, Mester R, Weizman A
Three-month treatment course of methylphenidate treatment increases plasma levels of dehydroepiandrosterone and dehydroepiandrosterone sulphate in attention deficit hyperactivity disorder
Neuropsychobiology. 2003;48(3):111-5.
26. Kotler M, **Strous RD**, Reznik I, Shwartz S, Weizman A, Spivak B
Sulpiride Augmentation of Olanzapine in the Management of Treatment-Resistant Chronic Schizophrenia: Evidence for Improvement of Mood Symptomatology
International Clinical Psychopharmacology 2004;19:23-26.
27. Maayan R, Kaplan B, **Strous RD**, Abou Kaud M, Fisch B, Shinnar N, Weizman A
The influence of parturition on the level and synthesis of sulfated and free neurosteroids in rats
Neuropsychobiology 2004;49:17-23.
28. Shaked G, Renert N, Mahuda I, **Strous RD**
Psychiatric Care in the Middle East: A "Mental Health Supermarket" in the Town of Lod
Psychiatric Rehabilitation Journal 2004;27:207-211.
29. **Strous RD**, Ofir D, Brodsky O, Yakirevitch J, Drannikov A, Navo N, Kotler M
Reactions of Psychiatric Inpatients to the Threat of Biological and Chemical Warfare in Israel
Journal of Nervous and Mental Disorders 2004;192:318-323.
30. Reznik I, Yavin I, Stryjer R, Spivak B, Gonen N, Kotler M, **Strous RD**, Weizman A, Mester R.
Clozapine in the treatment of obsessive-compulsive symptoms in schizophrenia. A case series study.
Pharmacopsychiatry 2004 Mar;37(2):52-6.
31. Ritsner M, Maayan R, Gibel A, **Strous RD**, Modai I, Weizman A.
Elevation of the Cortisol/Dehydroepiandrosterone and Cortisol/Dehydroepiandrosterone Sulfate Ratios in Medicated Schizophrenia Inpatients.
European Neuropsychopharmacology 2004;14:267-273.
32. **Strous RD**, Alvir J, Robinson D, Sheitman B, Chakos M, Lieberman JA. Premorbid function in Schizophrenia, relation to baseline symptoms, treatment response and medication side-effects.
Schizophrenia Bulletin 2004;30:265-78
33. **Strous RD**, Strjyer R, Ofir D, Weiss M, Bar F, Baruch Y, Kotler M
DSMIV self-evaluation by psychiatrists.
Israel Journal of Psychiatry 2004;41:197-207.

34. Lerner V, Libov I, Kotler M, **Strous RD**
Combination of Atypical Neuroleptics in Treatment of Resistant Schizophrenic and Schizoaffective Patients
Progress in Neuro-Psychopharmacology and Biological Psychiatry 2004;28:89-98.
35. Stryjer R, **Strous RD**, Bar F, Shaked G, Shiloh R, Rozenzweig S, Grupper D, Buchman N, Kotler M, Rabey JM, Weizman A.
Donepezil augmentation of clozapine monotherapy in schizophrenia patients: a double-blind cross over study.
Human Psychopharmacology: Clinical & Experimental 2004;19:343-6.
36. Shifman S, Bronstein M, Sternfeld M, Pisanté A, Weizman A, Reznik I, Spivak B, Grisaru N, Karp L, Schiffer R, Kotler M, **Strous RD**, Swartz-Vanetik M, Y. Knobler HY, Shinar E, Yakir B, Zak NB, Darvasi A.
COMT: A common susceptibility gene in bipolar disorder and schizophrenia
American Journal of Medical Genetics 2004;128B:61-4.
37. Spivak B, Golubchik P, Mozes T, Vered Y, Weizman A, **Strous RD**
Low Platelet-Poor Plasma Levels of Serotonin in Adult Autistic Patients
Neuropsychobiology. 2004;50(2):157-60
38. Ilani T, **Strous RD**, Fuchs S
Dopaminergic regulation of immune cells via D3 dopamine receptor: a pathway mediated by activated T cells.
FASEB Journal. 2004 ;18:1600-2.
39. Bhatia T, Sabeeha MR, Shriharsh V, Garg K, Segman RH, Uriel HL, **Strous R**, Nimgaonkar VL, Bernard L, Deshpande SN.
Clinical and familial correlates of tardive dyskinesia in India and Israel.
Journal Postgraduate Medicine. 2004;50:167-72.
40. Stopkova P, Saito T, Papolos DF, Vevera J, Paclt I, Zukov I, Bersson YB, Margolis BA, **Strous RD**, Lachman HM.
Identification of PIK3C3 promoter variant associated with bipolar disorder and schizophrenia.
Biological Psychiatry 2004 55:981-988.
41. **Strous RD**, Maayan R, Lapidus R, Goredetsky L, Zeldich E, Kotler M, Weizman A.
Increased Circulatory Dehydroepiandrosterone (DHEA) and Dehydroepiandrosterone-Sulphate (DHEA-S) in First-Episode Schizophrenia: Relationship to Gender, Aggression and Symptomatology.
Schizophrenia Research 2004;71:427-34.
42. Mendelsohn E, Rosenthal M, Bohiri Y, Werber E, Kotler M, **Strous RD**.
Rivastigmine Augmentation in the Management of Chronic Schizophrenia with Comorbid Dementia: An Open-Label Study investigating effects on Cognition, Behavior and Activities of Daily Living
International Clinical Psychopharmacology 2004;19:319-24.
43. **Strous RD**, Golubchik P, Maayan R, Mozes T, Tuati-Werner D, Weizman A, Spivak B.
Lowered DHEA-S Plasma Levels in Adult Individuals with Autistic Disorder
European Neuropsychopharmacology 2005;15:305-9

44. Lerer B, Segman RH, Tan E, Basile VS, Cavallaro R, Aschauer HN, **Strous RD**, Chong S, Verga M, Scharfetter J, Meltzer HY, Kennedy JL, Macciardi F.
Combined analysis of 635 patients confirms an age-related association of the serotonin 2A receptor gene with tardive dyskinesia and specificity for the non-orofacial subtype.
International Journal of Neuropsychopharmacology 2005;28:1-15.
45. **Strous RD**, Ratner Y, Gibel A, Ponizovsky A, Ritsner M
Longitudinal assessment of coping strategies at exacerbation and stabilization in schizophrenia
Comprehensive Psychiatry 2005;46:167-175.
46. Maayan R, **Strous RD**, Abou-Kaoud M, Weizman A.
The Effect of 17 β Estradiol Withdrawal on the Level of Brain and Peripheral Neurosteroids in Ovariectomized Rats
Neuroscience Letters 2005;384:156-61.
47. Nachshoni T, Ebert T, Abramovitch Y, Assael-Amir M, Kotler M, Maayan R, Weizman A, **Strous RD**.
Improvement of Extrapiramidal Symptoms following DHEA Administration in Antipsychotic Treated Schizophrenia Patients: A 7-Day Randomized, Double-Blind Placebo Controlled Trial
Schizophrenia Research 2005;79:251-256.
48. Shlosberg A, **Strous RD**
Long-Term Follow-up (32 years) of PTSD in Yom Kippur War Veterans
Journal of Nervous and Mental Disease 2005;193:693-6.
49. Laufer N, Maayan R, Hermesh H, Marom S, Gilad R, **Strous R**, Weizman A.
Involvement of GABA_A receptor modulating neuroactive steroids in patients with social phobia.
Psychiatric Research 2005;137:131-6.
50. **Strous RD**, Lapidus R, Viglin D, Kotler M, Lachman HM
Analysis of an Association between the COMT polymorphism and Clinical Symptomatology in Schizophrenia
Neuroscience Letters 2006;393:170-3.
51. **Strous RD**, Weiss M, Felsen I, Finkel B, Melamed Y, Kotler M, Laub D.
Video Testimony of Long-Term Hospitalized Psychiatrically Ill Holocaust Survivors
American Journal of Psychiatry 2005 162: 2287-2294.
52. Baruch Y, Kotler M, Lerner Y, Benatov J, **Strous RD**.
Psychiatry Admissions and Hospitalization in Israel: An Epidemiological Study of Where We Stand Today and Where We Are Going
Israel Medical Association Journal 2005;7:803–807.
53. **Strous RD**, Maayan R, Kotler M, Weizman A.
Hormonal Profile Effects following Dehydroepiandrosterone (DHEA) Administration to Schizophrenia Patients
Clinical Neuropharmacology 2005; 28:265-269.
54. Iancu I, **Strous RD**, Marchevsky S, Poreh A, Chelben Y, Kotler M
Psychiatric inpatients' reactions to the SARS epidemic: an Israeli survey
Israel Journal of Psychiatry and Related Sciences 2005;42:258-62.
55. Kipnis J, Cardon M, **Strous RD**, Schwartz M
Loss of autoimmune T cells correlates with brain diseases: implications for schizophrenia?

Trends in Molecular Medicine 2006;12:107-112.

56. Perl O, **Strous RD**, Dranikov A, Chen R, Fuchs S
Low levels of alpha7 nicotinic acetylcholine receptor mRNA on peripheral blood lymphocytes in schizophrenia and its association with illness severity
Neuropsychobiology 2006;53:88-93.
57. Mendelsohn A, **Strous RD**, Bleich M, Assaf Y, Hendler T
Regional Axonal Abnormalities in First-Episode Schizophrenia: Evidence Based on High b-value Diffusion Weighted Imaging
Psychiatry Research: 2006;146:223-229.
58. Spivak B, **Strous RD**, Shaked G, Shabash E, Kotler M, Weizman A.
Reboxetine versus Fluvoxamine in the Treatment of Motor Vehicle Accident Related Post Traumatic Stress Disorder: A Double-Blind, Fixed-Dosage Controlled Trial
Journal of Clinical Psychopharmacology 2006;26:152-156.
59. **Strous RD**, Greenbaum L, Kanyas K, Merbl Y, Horowitz A, Karni O, Viglin D, Olender T, Deshpande SN, Lancet D, Ben-Asher E, Lerer B
Association of the dopamine receptor interacting protein gene, *NEF3*, with early response to antipsychotic drugs
International Journal of Neuropsychopharmacology 2006;10:321-333.
60. **Strous RD**, Kupchik M, Roitman S, Schwartz S, Gonen N, Mester R, Weizman A, Spivak B
Comparison between Risperidone, Olanzapine, and Clozapine in the Management of Chronic Schizophrenia: A Naturalistic Prospective 12-Week Observational Study
Human Psychopharmacology 2006;21:235-243.
61. **Strous RD**, Bar F, Keret N, Lapidus R, Kosov N, Chelben J, Kotler M.
Analysis of Clinical Characteristics and Antipsychotic Medication Prescribing Practices of First Episode Psychosis: A Naturalistic Prospective Study.
Israel Journal of Psychiatry and Related Sciences 2006;43:2-9.
62. Ritsner MS, Gibel A, Ratner Y, Tsinovoy G, **Strous RD**
Improvement of sustained attention and visual and movement skills, but not clinical symptoms, after dehydroepiandrosterone augmentation in schizophrenia: a randomized, double-blind, placebo-controlled, crossover trial.
Journal of Clinical Psychopharmacology 2006;26:495-499.
63. Kupchik M, **Strous RD**, Erez R, Gonen N, Weizman A, Spivak B
Demographic and Clinical Characteristics of Motor Vehicle Accident Victims in the Community General Health Outpatient Clinic: A Comparison of Post-Traumatic Stress Disorder (PTSD) and Non-PTSD subjects
Depression and Anxiety 2007;24:244-50.
64. Maayan R, Touati-Werner D, Ram E, **Strous RD**, Keren O, Weizman A.
The protective effect of frontal cortex dehydroepiandrosterone in anxiety and depressive models in mice.
Pharmacology, Biochemistry and Behavior 2006;85:415-421.
65. Lepkifker E, Kotler M, Horesh N, **Strous RD**, Iancu I
Experience with Lithium Therapy in Mood Disorders among the Middle Aged and Elderly Patient Subpopulation

Depression and Anxiety 2006;24:571-576.

66. **Strous RD**, Stryjer R, Maayan R, Gal G, Viglin D, Katz E, Eisner, D, Weizman A. Analysis of Clinical Symptomatology, Extrapyramidal Symptoms and Neurocognitive Dysfunction following Dehydroepiandrosterone (DHEA) Administration in Olanzapine Treated Schizophrenia Patients: A Randomized, Double-Blind Placebo Controlled Trial Psychoneuroendocrinology 2007;32:96-105.
67. **Strous RD**, Mishali N, Ranan Y, Benyatov J, Green D, Zivotofsky AZ. Confronting the bomber: Coping at the site of previous terror attacks Journal of Nervous and Mental Disease 2007;195:233-9.
68. Greenbaum L,* **Strous RD**, * Kanyas K, Merbl Y, Horowitz A, Karni O, Katz E, Kotler M, Olender T, Deshpande SN, Lancet D, Ben-Asher E, Lerer B. (*equal contribution) Association of the RGS2 gene with extrapyramidal symptoms (EPS) induced by treatment with antipsychotic medication. Pharmacogenetics and Genomics 2007;17:519-28.
69. Alish Y, Birger M, Manor N, Kertzman S, Zerzion M, Kotler M, **Strous RD**. Schizophrenia Sex Offenders: A Clinical and Epidemiological Comparison Study International Journal of Law and Psychiatry 2007;30:459-66.
70. Zivotofsky AZ, Edelman S, Green T, Fostick L, **Strous RD**. Hemisphere asymmetry in schizophrenia as revealed through line bisection, line trisection and letter cancellation Brain Research 2007;1142:70-9.
71. Iancu I, Tchernihovsky E, Maayan R, Poreh A, Dannon P, Kotler M, Weizman A, **Strous RD**. Circulatory neurosteroid levels in smoking and non-smoking chronic schizophrenia patients European Neuropsychopharmacology 2007;17:541-545.
72. Greenbaum L, Smith RC, Rigbi A, **Strous R**, Teltsh O, Kanyas K, Korner M, Lancet D, Ben-Asher E, Lerer B. Further evidence for association of the RGS2 gene with antipsychotic induced parkinsonism: Protective role of a functional polymorphism the 3'untranslated region. Pharmacogenomics Journal 2009;9:103-10.
73. Zivotofsky AZ, Oron L, Hibsher-Jacobson L, Weintraub Y, **Strous RD**. Finding the hidden faces: Schizophrenic patients fare worse than healthy subjects Neuropsychologia 2008;46:2140-4.
74. **Strous RD**, Gibel A, Maayan R, Weizman A, Ritsner MS. Hormonal response to dehydroepiandrosterone administration in schizophrenia: Findings from a randomized, double-blind, placebo-controlled, crossover study Journal Clinical Psychopharmacology 2008;28:456-9.
75. **Strous RD**, Ritsner MS, Adler S, Ratner Y, Maayan R, Kotler M, Lachman H, Weizman A. Improvement of Aggressive Behavior and Quality of Life Impairment Following S-Adenosyl-Methionine (SAM-e) Augmentation in Schizophrenia European Neuropsychopharmacology 2009;19:14-22.
76. Nachshoni T, Abramovitch Y, Lerner V, Assael-Amir M, Kotler M, **Strous RD**

Psychologist's and Social Workers' Self-Descriptions Using DSM-IV Psychopathology
Psychological Reports 2008;103:173-88.

77. Shoenfeld N, Ulman A, Weiss M, **Strous RD**
To lock or not to lock the rooms: the key to autonomy?
Psychiatry Services 2008;59:1100-2.
78. Stryjer R, Spivak B, **Strous RD**, Shiloh R, Harary E, Polak L, Birgen M, Kotler M, Weizman A.
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EXHIBIT 13

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
SHMUEL ELIMELECH BRAUN, et. al.)	
)	
Plaintiff,)	Civ. No. 1:15-cv-01136-BAH
)	
v.)	
)	
THE ISLAMIC REPUBLIC OF IRAN, et al.,)	
)	
Defendants.)	
_____)	

EXPERT DECLARATION OF DR. RAEL STROUS

Re: Esther Braun

I have been retained by the Plaintiffs in the matter of *Braun v. The Islamic Republic of Iran* to provide a report and testimony regarding the mental health of Esther Braun.

Professional Qualifications

1. I am a Medical Doctor specializing in psychiatry. I am currently employed as the Deputy Hospital Director and Director of the Ambulatory Service of the Be'er Yaakov Mental Health Center located in Be'er Yaakov, Israel. I also serve as Full Professor, Department of Psychiatry at the Sackler Faculty of Medicine at the Tel Aviv University and maintain a small private practice in clinical psychiatry.

2. I received my medical degree in 1989 from the University of Witwatersrand in Johannesburg, South Africa. Between 1992 and 1996, I performed my residency in psychiatry at the Albert Einstein College of Medicine in the Bronx, New York. In 1996, I served as Chief Resident at the Bronx Psychiatric State Hospital. From 1996 through 1998, I performed a

Expert Declaration of Dr. Rael Strous

Re. Esther Braun

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clinical research fellowship in psychopharmacology at the Commonwealth Research Center, Massachusetts Mental Health Center affiliated with the Harvard Medical School.

3. Before embarking on my career in psychiatry, I served as an emergency room doctor and as a general physician in pediatrics and trauma.

4. I have approximately 150 peer reviewed research publications to my name including several in the field of chronic post-traumatic stress disorder (PTSD).

5. Based on my education and experience as outlined above, I have provided expert reports that were submitted as exhibits in *Biton v. The Palestinian Interim Self-Government Authority, et al.*, 01 CV 382 (RWR), *Gilmore v. The Palestinian Interim Self-Government Authority et al.*, 01-cv-00853 (GK), *Rubin v. Islamic Republic of Iran_01-1655* (RCL), *Ben Haim v. Islamic Republic of Iran*, 02-01811 (RCL) and *Kaplan v. Hezbollah, et al.*, No. 09-cv-646 (RWR) in the United States District Court for the District of Columbia, *Leibovitch v. The Syrian Arab Republic et al.*, 08 CV 01939 (WTH) in the United States District Court for the Northern District of Illinois, and in *Shatsky v. The Syrian Arab Republic et. al.*, 02-2280-RJL in the United States District Court of the District of Columbia. I testified at a deposition in, *Saperstein v. Palestinian Authority*, Case No. 0420225-CIV-Turnoff in the United States District Court for the Southern District of Florida. I have testified as an expert at one trial *Sokolow vs Palestinian Liberation Organization et al.*, 04-CV-397(GBD). In Israel, I have also submitted court mandated evaluations of psychiatric patients.

6. A copy of my curriculum vitae including a list of all publications authored by me within the preceding ten years is attached hereto.

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7. I have been asked to provide an evaluation for Esther Braun. To prepare this evaluation, I examined Plaintiff Esther Braun on 4 May 2016. Upon examining Esther Braun, I prepared a written Psychiatric Evaluation for her. That written Psychiatric Evaluation represented my professional assessment of Esther Braun. Accordingly, I incorporate by reference into this report the Psychiatric Evaluation regarding Plaintiff Esther Braun dated 4 May 2016 (attached hereto).

Psychiatric Disorders

8. To facilitate understanding and analysis of the Psychiatric Evaluation, I am including a brief explanation of Persistent Complex Bereavement Disorder, Post-traumatic Stress Disorder and Anxiety Disorder which afflicts Esther Braun as indicated in her Psychiatric Evaluation.

Persistent Complex Bereavement Disorder

9. Persistent Complex Bereavement Disorder (also known as Pathological Grief or Complicated Mourning) refers to a description of the normal mourning process that leads to chronic or ongoing mourning. The term "Pathological Grief" is applied to people who are unable to get over their grief despite the passage of time. It can take most people up to several years to get past a serious loss especially when the loss is associated with a violent and unexpected death. The person may experience intrusive distressing preoccupation with the deceased and wish to be reunited with the deceased. They may feel a sense of futility about the future, difficulty acknowledging the death, excessive irritability, bitterness or anger about the unfairness of the death and most significantly impaired social/occupational functioning. A pathological grief

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reaction is usually diagnosed after a long time (one or more years) have passed and the grieving person is not improving.

Post-Traumatic Stress Disorder

10. Post-Traumatic Stress Disorder (“PTSD”) is a condition which develops from having been exposed to, or witnessing, life-threatening events. In addition, the traumatic event may be indirect, by hearing of a relative or close friend who has experienced the life threatening event. Indirectly experienced death must be accidental or violent. PTSD is characterized by distinct types of symptoms. These symptoms include avoidance, re-experiencing the event, and hyper-vigilance. Avoidance is the active escape from situations that the PTSD victim associates with the event. Re-experiencing is reliving the memory of the event. Hypervigilance is a cluster of symptoms that includes exaggerated startle response, inability to fall asleep and inability to stay asleep.

11. The disorder is also characterized by negative alterations in mood or cognitions which indicates a decline in someone’s mood or thought patterns. This can include memory problems that are exclusive to the event, negative thoughts or beliefs about one’s self or the world, distorted sense of blame for one’s self or others, related to the event, being stuck in severe emotions related to the trauma (e.g. horror, shame, sadness), severely reduced interest in pre-trauma activities and feeling detached, isolated or disconnected from other people.

12. Due to their suffering and symptoms, educational and employment prospects for PTSD victims are often lowered. Some have difficulty interacting with others.

13. Younger victims and females may be more likely to be susceptible to PTSD.

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14. Overall effects on PTSD patients from this illness are severe. Patients are easily distractible due to their exaggerated response to stimuli. Individuals face considerably lowered employment prospects and increased likelihood of difficulty in forming and maintaining interpersonal relationships. For those who are married or who are able to marry and have children the stress of childrearing will be compounded. The inability to relax and have a good time is extremely common with PTSD patients.

Anxiety Disorder

15. The essential feature of anxiety disorder is excessive anxiety and worry (apprehensive expectation) about a number of events or activities. The intensity, duration, or frequency of the anxiety and worry is out of proportion to the actual likelihood or impact of the anticipated event. The individual finds it difficult to control the worry and to keep worrisome thoughts from interfering with attention to tasks at hand. During the course of the disorder, the focus of worry may shift from one concern to another. The worries are excessive and typically interfere significantly with functioning. Individuals with anxiety disorder report distress due to constant worry and related impairment in social, occupational, or other important areas of functioning.

16. Esther Braun displays some form of Persistent Complex Bereavement Disorder, Post-traumatic Stress Disorder and Anxiety Disorder either currently or in the past as a result of her granddaughter being killed in a terror attack in 2014.

17. Based on my evaluation of Esther Braun, I believe that many of her symptoms with which she has been diagnosed are likely to be present in varying degrees for a significant

Expert Declaration of Dr. Rael Strous

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time to come and while it is impossible to state for any absolute certainty, many of the symptoms may even be permanent.

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

Dated: 24 May 2016

A handwritten signature in black ink, appearing to read "R. Strous", is written over a light green rectangular background.

Rael Strous, MD

Rael Strous MD

Psychiatrist

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Israel Medical License: 31932

Israel Psychiatry License: 17270

4 May 2016

Psychiatric Evaluation: Esther Braun

Date of Birth: REDACTED

This evaluation is based on clinical interview and formal psychiatric evaluation, as well as my review of the discovery materials in this case as listed in my introduction. My opinions are stated within a reasonable degree of medical certainty.

Identifying Information

Esther Braun is a 61-year-old female dual USA and Israeli citizen currently residing in Los Angeles, USA. She was born in Los Angeles and has lived almost her entire life in the city (apart from 2 years in New York). She is the mother of 5 children. She is employed as a teacher in a high school.

Presenting Problem

Mrs Braun reports that she is very close to her daughter in law. She and her son used to call almost every day. On 22 October 2014, her daughter in law, Chana, called from Israel and told her that there had been a terrible accident and that it was due to a terrorist. Then the call was disconnected. She called again and told her that her granddaughter was injured. Mrs Braun then called her husband to come home

immediately. She recalls that her daughter in law called again telling her this time that her granddaughter was very sick. She told her to look at an online site "yeshiva world". She did so with her husband and saw that the site was reporting that there was a terror attack in Jerusalem and that there was a 3 month old baby who was killed. In a state of hysteria, she then spoke again to her daughter in law who told her that she and her son were OK, but that their baby was dead.

Mrs Braun indicates that on hearing the news she did not know what to do with herself. From the extreme shock, she felt at a loss regarding how to react or think. She felt completely overwhelmed. She knew that the baby had obviously been so badly injured and that ultimately this tragedy was all in the hands of G-d. She then spoke to her son who was completely shattered. She remembers that she tried to calm him down with quoting verses from the psalms and the bible. Ultimately though she was trying to calm herself down from the absolute shock and trauma that the event caused her. This was so unbelievable and painful for her as she recalls.

She remembers that her house very quickly filled up with people. She decided however that she needed to be with her son and daughter-in-law, so she took the next available flight she could manage out to Israel. His flight took around 24 hours to get to Israel. She remembers that all the newspapers had pictures of the baby, including newspapers on the plane. Mrs Braun reports that the week of *Shiva* (seven days of mourning) was surreal. The pain for her remained particularly overwhelming. Added to this was the pain of seeing how her son was suffering. Since he was their youngest child, this was especially difficult since she is particularly close to him in a very protective manner. It took a long time for her to return to some function after her return to the USA. This was a profoundly painful experience for her and the family and she struggled to move on with the pain of the loss of the child and the ongoing pain of her son and daughter-in-law as they tried to cope with their pain.

Long-term Physical and Psychological Repercussions Following the Event

Mrs Braun knows that she needs to get over the loss and move on with her life. However she reports that she simply cannot do so despite how much she has tried even after the year and a half that has transpired since the event. She keeps constantly

with her a picture of her granddaughter Chaya Zissel who was killed in the terror attack. She feels still shattered and as if that life has become for her like "play acting" with constant underlying anxiety. The memory and awareness of this terror attack and the subsequent loss is constantly on her mind as she describes it. It has totally changed how she looks at life and experiences it. Everything for her now is tainted with the memory of the loss.

The pain often is accentuated when she sees other babies of the same age as Chaya Zissel (born around July 2014) who are moving along with their lives. She always looks at such children intently and thinks about her Chaya Zissel and what could have been.

Mrs Braun also reports that she believes that as a result of the loss her relationship with her son has changed adversely. They used to have a much closer and open interaction. She reports that he has closed up— more at some times than others- and this is difficult for her.

Post-traumatic symptoms:

Mrs Braun reports that in the beginning, straight after the loss, she would suffer from intense "PTSD symptoms". These included the following symptoms:

1. She would wake up with nightmares. She recalls that she would be told that she was screaming "catch the baby!" – referring to the scene of the terror attack where the baby was hit by the moving car and "flew through the air" out the carriage and hit her head on the sidewalk/road. To this day, she reports, she wakes up thinking about the baby and the "need to protect that child".
2. She reports that she becomes nauseous when she talks about the event.
3. She does not however avoid talking about the event even though the memory and the preoccupation with the loss causes her harm by its negative effect on her.

The event and its aftermath have also affected Mrs Braun social interactions. She reports that when in crowds, people do not know how to relate to her and her devastating loss. She indicates that the stigma is still there and she does not feel good with this aspect of her suffering regarding how others see her. This has also affected

aspects of her marriage. She reports that she gets very irritable when her husband comes home late. This was never the case prior to the terror attack.

She recognized that she needed to see a psychologist in addition to others recommending her to see someone professional to assist her in dealing with her pain and diminished function. She met several times with both Dr Rubin and Dr Blumenthal on several occasions for trauma counselling who both assisted her with her pain and loss. She reports that she was more affected at an anxiety level than at a depressive level even though both remain prominent in her life. She feels that she is constantly relating events to what happened to her granddaughter.

Mrs Braun indicates that her anxiety is worst after religious festivals. It is at these times that her memory becomes most acute and intense. In addition, she feels disconnected at times from people around her. This includes both family and friends. When she delves into her memory, it is at such times that she feels emotionally numb. She knows this to be a defense mechanism for her against the inevitable pain that she experiences in such situations.

She also reports that her blood pressure became uncontrolled around the event. This resolved over time as she became more in control of her pain.

Previous Psychiatric Illnesses

Ms. Braun reports no psychiatric history of any type prior to the terror event.

Alcohol or Substance History

She reports no use of any drugs or smoking.

Current Medical Illnesses

Hypertension, controlled.

Family Psychiatric History

None reported

Mental Status

General appearance: Groomed appropriately.

Behavior: restless, comfortable talking with frequent repeating of comments regarding how much her life has been changed since the terror attack.

Affect: Pained expression when describing how she misses her granddaughter and especially when describing effects of the loss on her daughter. Appears unable to move on from the event and stuck in her response to the event and how she and her family have been affected.

Mood: Admits to daily anxiety since the event – believes she has never returned to where she was before the loss of Chaya Zissel.

Speech: Clear and coherent

Thought disorder: No evidence of formal thought disorder.

Thought Content: No evidence of delusional content.

Perceptual Disorder: No evidence of past or present hallucinations. No evidence of psychosis.

Neurocognitive and neuropsychiatric status: fully alert and oriented. Concentration and attention ability is intact.

Impulse Control: Intact.

Insight: Good.

Judgment: Good.

Reliability of Mental status and interview: very good.

Psychological Testing

HAM-D and HAM-A rating scales, PTSD scale (PDS) and Pathological Grief screening questionnaires were administered.

The Hamilton Anxiety Rating Scale (HAM-A) is a widely used and well-validated tool for measuring the severity of a patient's anxiety. The HAM-A probes 14 parameters.

The **Post-Traumatic Stress Diagnostic Scale (PDS)** is a 49-item self-report measure used in clinical or research settings to measure severity of Post-traumatic Stress Disorder (PTSD) symptoms related to a single identified traumatic event. The PDS

has four sections. Part 1 is a trauma checklist. In Part 2, those completing the scale are asked about this most disturbing traumatic event including when it happened, if anyone was injured, perceived life threat, and whether the event resulted in helplessness or terror. Part 3 evaluates 17 PTSD symptoms. Respondents are asked to rate the severity of the symptom from 0 ("not at all or only one time") to 3 ("5 or more times a week / almost always"). Part 4 assesses influence of the symptoms in their lives.

A semi-structured interview format to facilitate assessment of complicated grief, developed by Shear et al., was administered (**Interview Guide for Complicated Grief**). This is a screening rating scale with two Parts (A and B). The first section requires at least one of 4 symptoms to be endorsed indicating experience over the past month. The second section requires at least two of 8 symptoms to be endorsed. In addition, the **Brief Grief Questionnaire** developed by Shear and Essock was administered consisting of 5 screening questions (0-2) for Complicated Grief disorder.

Scores indicate presence of mild anxiety (score of 16 on the Ham-A), moderate PTSD (score of 20 on the PDS) and presence of pathological/complicated grief (2 of 4 on Part A, 6 of 8 on Part B; Score of 6 on Brief Grief Questionnaire). Please see attached documents with detailed scoring.

Report of Psychologist Dr Norman Blumenthal

Reports that on October 28 while he was on a visit to Israel, he met for close to two hours with Chaya Zissel's parents and grandparents to therapeutically assist them with their trauma reactions and grief. He reports that the grandparents (Including Sara Halperin), who were seen separately, were also assisted in clarifying their roles as providers of support and sympathy while maintaining optimal and therapeutic levels of discretion and independence.

Summary of Observations

Esther Braun is a 61-year-old female with signs and symptoms of partial PTSD, anxiety and pathological/complicated grief since her 3-month old granddaughter died following a terror attack. She reported feeling devastated from her loss and unable to move on resulting in a range of social and daily dysfunctional effects. Her coping

mecahanisms remain impaired and her quality of life has been markedly affected since the loss.

Prognosis

Esther Braun suffered significant grief and resultant anxiety following the loss of her granddaughter in a terror attack in 2014. It appears clear that her life has been affected to a significant extent in a range of areas in the time since the loss. It is not expected that her feelings of grief affecting many areas of her personal and interpersonal functioning will resolve in the short term, and they will continue to affect her indefinitely.

Diagnostic Formulation

309.89 (F43.8) Persistent Complex Bereavement Disorder; (moderate) with traumatic bereavement

300.09 (F41.8) Other Specified Anxiety Disorder (generalized anxiety not occurring more days than not in all 3 of 6 core symptoms)

309.81 (F43.10) Post-traumatic Stress Disorder (partial)



Rael Strous MD

Attachments: HAM-A rating scale results

PDS scale

Pathological Grief Screening (Interview Guide for Complicated Grief, Brief Grief Questionnaire)

Curriculum Vitae (Rael Strous MD)

Curriculum Vitae: Rael D. Strous MD

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Current Title and Affiliation:

Director Chronic Inpatient Unit, Beer Yaakov Mental Health Center

Associate Professor, Department of Psychiatry, Sackler Faculty of Medicine, Tel Aviv University

EDUCATION

- 1984 – 1989 Medical School, *University of Witwatersrand*, Johannesburg, South Africa, MBBCh
 1992 – 1996 Psychiatry residency, *Albert Einstein College of Medicine*, New York (USA Board Certification)
 1996 – 1998 Clinical Research Fellowship in Psychopharmacology, Massachusetts Mental Health Center, *Harvard Medical School*, Boston, USA

ADDITIONAL STUDIES

- 1987-1989 Psychology, Theological Bioethics, University of South Africa, Pretoria, South Africa
 1996 Neuroimaging Mini-Fellowship, Columbia University, NY, USA
 1995 Board Certification Forensic Examination, American College of Forensic Examiners

PROFESSIONAL EXPERIENCE

- 1990 Internship, Hillbrow Hospital, Medicine, Surgery, Johannesburg, South Africa
 1991 Alexandra Health Center, Ambulatory Med., General physician, Johannesburg, South Africa
 1991 Johannesburg General Hospital, Emergency Room MD
 1992-1996 Psychiatry Resident, **Albert Einstein College of Medicine**, Bronx Municipal Hospital, North Central Bronx Hospital, Montefiore Hospital (Chief Resident Bronx Psychiatric State 1995/6)
 1996-1998 Research Fellow, Commonwealth Research Center, Massachusetts Mental Health Center, **Harvard Medical School**
 1999–present Beer Yaakov Mental Health Center, Director Chronic Inpatient Unit (from 2003)
 2001-present Sackler Faculty of Medicine, Tel Aviv University Lecturer and Tutor
 Medical Students in Psychiatry
 2002-2006 Member Physician Committee, Beer Yaakov Mental Health Center Psychiatry
 2002-present Chairman Medication Committee, Beer Yaakov Mental Health Center
 2003-2006 Israel Society of Biological Psychiatry, Executive Board Member
 2003-2006 Israel Society of Biological Psychiatry Annual Conference Committee Member
 2004-present World Psychiatry Association (WPA) Section on Religion Committee Member
 2005-2006 World Psychiatry Association (WPA) Section, Committee Member
 on Law and Psychiatry
 2006, 2009, 2011 Israel Psychiatry Association Annual Congress, Scientific Organization Committee Member
 2005-2010 Member Clinical Teaching Committee, Sackler Faculty of Medicine, Tel Aviv University

ACADEMIC AND RESEARCH ACTIVITIES, SACKLER FACULTY OF MEDICINE

2009-2010: Director, New York State/American Program, Sackler Faculty of Medicine, Tel Aviv University
 2008-2010 Member Medical School Curriculum Committee
 2008-2010 Member Four Year Medical School Program Steering Committee
 2003-present: Member Medical School Admissions Evaluation Team
 2003-2008: Coordinator medical student exam in psychiatry (USA and Israeli medical students)
 2003-2006: Executive Board Member, Israel Society of Biological Psychiatry
 2005-present Member Editorial Board: Law and Medicine Journal
 2005-2010: Member Clinical Teaching Committee, Sackler Faculty of Medicine
 2006-present: Deputy Editor, Israel Journal of Psychiatry
 2008-2010: Member Planning Committee for four-year medical degree, Sackler Faculty of Medicine

ACADEMIC AND PROFESSIONAL AWARDS

1988 Alice Cox Award, Best medical student in psychiatry, University Witwatersrand Medical School
 1992-5 Top psychiatric resident in annual national PRITE examination, Department of Psychiatry
 Albert Einstein College of Medicine (top 1% of all USA psychiatry residents)
 1994/95 Burroughs Wellcome Leadership Award, American Medical Association (AMA)
 1994/95 Mead Johnson Fellowship Award, American Psychiatric Association (APA)
 1995 Young Investigator Award International Congress on Schizophrenia Research, USA
 1995 Lilly Resident Research Award, American Psychiatric Association (APA)
 1995/96 Young Scientist Award, 8th Biennial Winter Workshop on Schizophrenia (Switzerland)
 1996 Young Investigator Award, Society of Biological Psychiatry
 1996/7 Young Researcher Award, American Neuropsychiatric Association
 1996 Dupont-Warren Fellowship Award, Department of Psychiatry, *Harvard Medical School*
 1996 New Investigator Award (NCDEU)/National Institute Mental Health, USA (NIMH)
 2000 Rafaelsen Fellowship Award, Collegium Internationale Neuropsychopharmacologicum (CINP)
 2001 Fellowship Award, World Congress of Biological Psychiatry
 2002 Fellowship Award, European College of Neuropsychopharmacology (ECNP)
 2002 Team Award for Best Research Paper, Israel Psychiatry Association
 2002 Clinical Research Award: Best Clinical Research Paper, Israel Society of Biological Psychiatry
 2004 Outstanding Young Investigator Award, International Congress of Biological Psychiatry
 2004 Donald Cohen Fellowship Award, International Association of Child Psychiatry and Allied
 Professions (IACAPAP)
 2004 **Outstanding Teacher/Lecturer of the Year**, Sackler Faculty of Medicine, Tel Aviv University
 2006 Certificate of Honor (research presentation), Israel Society for Biological Psychiatry
 2007 **Outstanding Teacher/Lecturer of the Year**, Sackler Faculty of Medicine, Tel Aviv University
 2010 **Immigrant Scientist Recognition Award** from Israel Ministry of Immigration
 2010 **Outstanding Employee of Year**, Beer Yaakov Mental Health Center

GRANTS AWARDED

2000 Ministry Of Science: Chief Scientist Award, PRINCIPAL INVESTIGATOR, Clinical study of first-episode psychosis
 2000 Israel Institute of Psychobiology Grant, PRINCIPAL INVESTIGATOR, Functional MRI investigation in first-episode schizophrenia
 2000 Guggenheim Foundation Grant, PRINCIPAL INVESTIGATOR, Genetic polymorphisms in violence and aggression
 2000 Israel Ministry Of Defense Research Grant, PRINCIPAL INVESTIGATOR, Novel pharmacological management of treatment resistant PTSD

- 2000 NARSAD Young Investigator Award, PRINCIPAL INVESTIGATOR, Novel augmentation strategies with neurosteroids in schizophrenia
- 2002 Stanley Foundation Grant, CO- PRINCIPAL INVESTIGATOR, Neurosteroids in schizophrenia
- 2002 India-Israel Research Project, CO-INVESTIGATOR, Genetics of Schizophrenia
- 2002 Dreyfuss Health Foundation, PRINCIPAL INVESTIGATOR, Treatment resistant schizophrenia
- 2003 Stanley Foundation Grant, PRINCIPAL INVESTIGATOR, Methyl donors in schizophrenia
- 2003 NARSAD Young Investigator Award, PRINCIPAL INVESTIGATOR, Neurosteroids and management of treatment resistance and medication related side-effects in schizophrenia
- 2007 Mordechai Ofer Research Award Grant, Tel Aviv University, PRINCIPAL INVESTIGATOR, Psychiatry during the Nazi era, its relevance today and ethical ramifications for current practice

MEMBERSHIP IN PROFESSIONAL SOCIETIES

- 2003-present World Society of Biological Psychiatry
- 2003 International Group Therapy Association
- 2001-present European College of Neuropsychopharmacology (ECNP)
- 1999-present Israel Medical Society
- 1999-present Israel Psychiatric Association
- 1999-present Israel Society for Biological Psychiatry
- 1996 American College of Forensic Examiners
- 1996-8 Massachusetts Society of Medicine, USA
- 1994-8, 2006 International Society of Political Psychology
- 1992-1998 American Psychiatric Association
- 1990 South African Medical & Dental Council
- 1990 General Medical Council (Great Britain)

ACTIVE PARTICIPATION IN SCIENTIFIC MEETINGS (Poster or Lecture presentation)

- 1992 American Psychiatric Association, USA
- 1993 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Conference of Political Psychology, Boston, USA
Institute of Psychiatric Services, San Diego, USA
- 1994 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Congress on Schizophrenia Research, Colorado, USA
Institute of Psychiatric Services, Boston, USA
- 1995 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Congress on Schizophrenia Research, Switzerland
New Clinical Drug Evaluation Unit (NCDEU), Boca Raton, USA
American Neuropsychiatric Association, Orlando, USA
- 1996 American Psychiatric Association, USA
- 1997 Society of Biological Psychiatry, Kfar Giladi, Israel
- 1998 Israel Society of Neuroscience, Eilat, Israel
IBRO, International Brain Research Organization, Jerusalem, Israel
- 1999 CINP, Brussels, Belgium

- Israel Psychiatry Association, Jerusalem, Israel
 Israel Society of Neuroscience, Eilat, Israel
- 2001 American Psychiatric Association, New Orleans, USA
 World Congress Biological Psychiatry, Berlin, Germany
- 2002 Association of European Psychiatrists, Stockholm, Sweden
 ECNP, Barcelona Spain
 Pharmacogenetics, Mayo Clinic, Minnesota, USA
- 2003 European Conference on Violence in Clinical Psychiatry, London, England
 ACNP, Puerto Rico, USA
- 2004 International Congress of Biological Psychiatry
 Society of Biological Psychiatry, Hagoshrim, Israel
 International Congress of Neuropsychiatry, Athens, Greece
- 2005 Society of Biological Psychiatry, Hagoshrim, Israel
 International Conference on Medical Ethics, Haifa
 American Psychiatric Association, Atlanta, USA
 World Congress Biological Psychiatry, Vienna, Germany
- 2006 Nefesh Israel, Jerusalem (**Lecturer**)
 Society of Biological Psychiatry, Hagoshrim, Israel (**Lecturer**)
 Israel Psychiatry Association, Tel Aviv (**Lecturer**)
 International Society of Political Psychology, Barcelona, Spain (**Lecturer**)
 World Association Medical Law, Toulouse, France (**Lecturer**)
 ECNP (European College Neuropsychopharmacology) Paris, France
- 2007 Society of Biological Psychiatry, Hagoshrim, Israel (**Lecturer**)
 World Psychiatry Association: Coercive Treatment in Psychiatry, Dresden, Germany
(Lecturer)
- 2008 Society of Biological Psychiatry, Israel
- 2009 Nahariah Conference on Holocaust (**Lecturer**)
 Israel Medical Association Conference (**Lecturer**)
 Brother-Other: Israel/Poland Mental Health Association, Krakow, Poland (**Lecturer**)
- 2010 CIMP, Hong Kong (**Lecturer**)
 Society for International Research of Schizophrenia (SIRS), Florence, Italy (**Lecturer**)
 International Conference on 'Integrating Traditional Healing Practices into Counseling
 Psychology, Psychotherapy and Psychiatry.' Durban, South Africa, (**Lecturer**)
- 2011 International Conference, Medical Ethics, Bochum, Germany (**Lecturer**)
 International Conference for Clinical Ethics and Consultation, Amsterdam, Holland
(Lecturer)
 ECNP, Paris, France (**Lecturer**)

REVIEWER FOR FOLLOWING JOURNALS:

Archives of General Psychiatry, American Journal of Psychiatry, British Journal of Psychiatry,
 Neuropharmacology, Journal of Medical Ethics, European Journal of Neuropsychopharmacology,
 Journal of Nervous and Mental Disorders, Psychiatry Research, Schizophrenia Research, Biological
 Psychiatry, Schizophrenia Bulletin, Israel Journal of Psychiatry, Israel Medical Association Journal

PUBLICATIONS (150 in Total)**Original Research Articles**

1. **Strous, RD.**, Cowan, N., Ritter, W., Javitt, D.C.
Auditory sensory (“echoic”) memory dysfunction in schizophrenia.
American Journal of Psychiatry;152:10, 1517-1519, 1995.
2. Javitt, D.C , **Strous, RD.**, Grochowski, S., Ritter, W, Cowan, N.
Impaired precision, but normal retention, of auditory sensory memory information in schizophrenia.
Journal of Abnormal Psychology;106:315-324, 1997.
3. **Strous RD.**, Bark N, Parsia S, Volavka J, Lachman H. M.
Analysis of a functional Catechol-O-Methyltransferase gene polymorphism in schizophrenia:
Evidence for association with aggressive and antisocial behavior.
Psychiatry Research;69:71-77, 1997.
4. **Strous RD.**, Bark N, Woerner M, Lachman HM.
Lack of an association of a functional Catechol-O-Methyltransferase gene polymorphism in
schizophrenia.
Biological Psychiatry;41:493-495, 1997.
5. Green AI, Zimmet S, **Strous RD.**, Schildkraut JJ.
Substance use disorder and schizophrenia: Do patients with schizophrenia have a reward deficiency
syndrome that can be ameliorated by clozapine.
Harvard Review of Psychiatry;6:289-296, 1999.
6. Zimmet SV, **Strous RD.**, Burgess ES, Kohnstamm S, Green AI.
Effects of clozapine on substance use in patients with schizophrenia and schizoaffective
disorder: a retrospective survey.
Journal of Clinical Psychopharmacology;20:94-8, 2000.
7. **Strous RD.** Shtain M, Oselka-Goren H, Lustig M, Stryjer R, Zerzion M, Baruch Y, Chelben J.
Anticipatory Reactions of Psychiatric Inpatients to the Year 2000.
Journal of Nervous and Mental Disease 2000;188:786-788.
8. Ilani T, Ben-Shachar D, **Strous RD.**, Mazor M, Sheinkman A, Kotler M, Fuchs S.
A novel peripheral marker for schizophrenia: Increased levels of D3 dopamine
receptor mRNA in blood lymphocytes.
Proceedings of the National Academy of Sciences (PNAS), USA 2001, 98:625-8.
9. **Strous RD.** Spivak B, Yoran-Hegesh R, Maayan R, Averbuch E, Kotler M, Mestor R,
Weizman A.
Analysis of neurosteroid levels in attention deficit hyperactivity disorder.
International Journal of Neuropsychopharmacology 2001 ;4:259-64
10. **Strous RD.** Pollack S, Robinson D, Sheitman B, Lieberman JA. Seasonal
Admission Patterns in First Episode Psychosis, Chronic Schizophrenia and Non-
Schizophrenic Psychoses
Journal of Nervous and Mental Diseases 2001;189:642-4.

11. Szeszko PR, **Strous RD**, Goldman RS, Ashtari M, Knuth KH, Lieberman JA, Bilder RM. Neuropsychological correlates of hippocampus volumes in first-episode schizophrenia. American Journal of Psychiatry 2002;159:217-26.
12. Segman RH, Heresco-Levy U, Yakir A, Goltser T, **Strous RD**, Greenberg D, Lerer B. Interactive effect of cytochrome P450 17 α -hydroxylase and dopamine D3 receptor gene polymorphisms on abnormal involuntary movements in chronic schizophrenia Biological Psychiatry. 2002;;51:261-3.
13. Green AI, Burgess ES, Zimmet SV, Dawson R, **Strous RD** Alcohol and Cannabis use in schizophrenia: Effects of risperidone vs. clozapine. Schizophrenia Research 2003;60:81-5.
14. Stryjer R, **Strous RD**, Bar F, Werber E, Shaked G, Buhiri Y, Kotler M, Weizman A, Rabey JM Beneficial effect of donepezil augmentation in the management of comorbid schizophrenia and dementia Clinical Neuropharmacology 2003;26:12-7
15. **Strous RD**, Maayan R, Lapidus R, Stryjer R, Lustig M, Kotler M, Weizman A Value of Dehydroepiandrosterone (DHEA) Augmentation in the Management of Negative Symptoms in Schizophrenia Archives of General Psychiatry 2003;60:133-141
16. Stryjer R, **Strous RD**, Shaked G, Bar F, Feldman B, Kotler M, Polak L, Rosenzweig S, Weizman A Amantadine as augmentation therapy in the management of treatment resistant depression. International Clinical Psychopharmacology 2003;18:93-6.
17. **Strous RD**, Stryjer R, Keret N, Bergin M, Kotler M Reactions of Psychiatric and Medical Inpatients to Terror and Security Instability in Israel Journal of Nervous and Mental Disorders 2003;191:126-129.
18. Shifman S, Bronstein M, Sternfeld M, Shalom A, Lev-Lehman E, Grisaru N, Karp L, Kotler M, Knobler HY, Reznik I, Schiffer R, Shinar E, Spivak B, **Strous RD**, Swartz-Vanetik M, Weizman A, Yakir B, Risch N, Zak NB, Darvasi A. A highly significant association between a COMT haplotypes and schizophrenia. American Journal of Human Genetics 2002 6:1296-302
19. Stryjer R, **Strous RD**, Bar F, Poyurovsky M, Weizman A, Kotler M Treatment of neuroleptic induced akathisia with the 5HT_{2a} antagonist trazodone. Clinical Neuropharmacology 2003;26:137-41.
20. **Strous RD**, Nolan K, Lapidus R, Saito T, Lachman HM Aggressive behavior in schizophrenia is associated with the low enzyme activity COMT polymorphism: A replication study. American Journal of Medical Genetics 2003;120:29-34.
21. Stopkova P, Saito T, Papolos DF, Stryjer R, **Strous RD**, Lachman HM Polymorphism screening of PIP5K2A: A candidate gene for 10p-linked psychiatric disorders American Journal of Medical Genetics 2003;123B:50-58.
22. Vered Y, Golubchik P, Mozes T, **Strous RD**, Nechmad A, Mester R, Weizman A, Spivak B. The platelet poor plasma 5-HT response to carbohydrate rich meal administration in adult autistic patients compared to normal controls.

Human Psychopharmacology 2003;18:395-9.

23. Perl O, Ilani T, **Strous RD**, Lapidus R, Fuchs S
The $\alpha 7$ Nicotinic Acetylcholine Receptor in Schizophrenia: Decreased mRNA Levels in Peripheral Blood Lymphocytes
FASEB Journal 2003;17:1948-1950.
24. Segman, R.H., Goltser, T., Heresco-Levy U., Finkel, B., **Strous, RD.**, Shalem, R., Schlafman, M., Yakir, A., Greenberg, D., Lerner, A., Shelevoy, A., Lerer, B.:
Association of dopaminergic and serotonergic genes with tardive dyskinesia in patients with chronic schizophrenia.
Pharmacogenomics J. 2003;3:277-83.
25. Maayan R, Spivak B, **Strous RD**, Nechmad A, Yoran-Hegesh R, Averbuch E, Mester R, Weizman A
Three-month treatment course of methylphenidate treatment increases plasma levels of dehydroepiandrosterone and dehydroepiandrosterone sulphate in attention deficit hyperactivity disorder
Neuropsychobiology. 2003;48(3):111-5.
26. Kotler M, **Strous RD**, Reznik I, Shwartz S, Weizman A, Spivak B
Sulpiride Augmentation of Olanzapine in the Management of Treatment-Resistant Chronic Schizophrenia: Evidence for Improvement of Mood Symptomatology
International Clinical Psychopharmacology 2004;19:23-26.
27. Maayan R, Kaplan B, **Strous RD**, Abou Kaud M, Fisch B, Shinnar N, Weizman A
The influence of parturition on the level and synthesis of sulfated and free neurosteroids in rats
Neuropsychobiology 2004;49:17-23.
28. Shaked G, Renert N, Mahuda I, **Strous RD**
Psychiatric Care in the Middle East: A "Mental Health Supermarket" in the Town of Lod
Psychiatric Rehabilitation Journal 2004;27:207-211.
29. **Strous RD**, Ofir D, Brodsky O, Yakirevitch J, Drannikov A, Navo N, Kotler M
Reactions of Psychiatric Inpatients to the Threat of Biological and Chemical Warfare in Israel
Journal of Nervous and Mental Disorders 2004;192:318-323.
30. Reznik I, Yavin I, Stryjer R, Spivak B, Gonen N, Kotler M, **Strous RD**, Weizman A, Mester R.
Clozapine in the treatment of obsessive-compulsive symptoms in schizophrenia. A case series study.
Pharmacopsychiatry 2004 Mar;37(2):52-6.
31. Ritsner M, Maayan R, Gibel A, **Strous RD**, Modai I, Weizman A.
Elevation of the Cortisol/Dehydroepiandrosterone and Cortisol/Dehydroepiandrosterone Sulfate Ratios in Medicated Schizophrenia Inpatients.
European Neuropsychopharmacology 2004;14:267-273.
32. **Strous RD**, Alvir J, Robinson D, Sheitman B, Chakos M, Lieberman JA. Premorbid function in Schizophrenia, relation to baseline symptoms, treatment response and medication side-effects.
Schizophrenia Bulletin 2004;30:265-78
33. **Strous RD**, Strjyer R, Ofir D, Weiss M, Bar F, Baruch Y, Kotler M
DSMIV self-evaluation by psychiatrists.
Israel Journal of Psychiatry 2004;41:197-207.

34. Lerner V, Libov I, Kotler M, **Strous RD**
Combination of Atypical Neuroleptics in Treatment of Resistant Schizophrenic and Schizoaffective Patients
Progress in Neuro-Psychopharmacology and Biological Psychiatry 2004;28:89-98.
35. Stryjer R, **Strous RD**, Bar F, Shaked G, Shiloh R, Rozenzweig S, Grupper D, Buchman N, Kotler M, Rabey JM, Weizman A.
Donepezil augmentation of clozapine monotherapy in schizophrenia patients: a double-blind cross over study.
Human Psychopharmacology: Clinical & Experimental 2004;19:343-6.
36. Shifman S, Bronstein M, Sternfeld M, Pisanté A, Weizman A, Reznik I, Spivak B, Grisaru N, Karp L, Schiffer R, Kotler M, **Strous RD**, Swartz-Vanetik M, Y. Knobler HY, Shinar E, Yakir B, Zak NB, Darvasi A.
COMT: A common susceptibility gene in bipolar disorder and schizophrenia
American Journal of Medical Genetics 2004;128B:61-4.
37. Spivak B, Golubchik P, Mozes T, Vered Y, Weizman A, **Strous RD**
Low Platelet-Poor Plasma Levels of Serotonin in Adult Autistic Patients
Neuropsychobiology. 2004;50(2):157-60
38. Ilani T, **Strous RD**, Fuchs S
Dopaminergic regulation of immune cells via D3 dopamine receptor: a pathway mediated by activated T cells.
FASEB Journal. 2004 ;18:1600-2.
39. Bhatia T, Sabeeha MR, Shriharsh V, Garg K, Segman RH, Uriel HL, **Strous R**, Nimgaonkar VL, Bernard L, Deshpande SN.
Clinical and familial correlates of tardive dyskinesia in India and Israel.
Journal Postgraduate Medicine. 2004;50:167-72.
40. Stopkova P, Saito T, Papolos DF, Vevera J, Paclt I, Zukov I, Bersson YB, Margolis BA, **Strous RD**, Lachman HM.
Identification of PIK3C3 promoter variant associated with bipolar disorder and schizophrenia.
Biological Psychiatry 2004 55:981-988.
41. **Strous RD**, Maayan R, Lapidus R, Goredetsky L, Zeldich E, Kotler M, Weizman A.
Increased Circulatory Dehydroepiandrosterone (DHEA) and Dehydroepiandrosterone-Sulphate (DHEA-S) in First-Episode Schizophrenia: Relationship to Gender, Aggression and Symptomatology.
Schizophrenia Research 2004;71:427-34.
42. Mendelsohn E, Rosenthal M, Bohiri Y, Werber E, Kotler M, **Strous RD**.
Rivastigmine Augmentation in the Management of Chronic Schizophrenia with Comorbid Dementia: An Open-Label Study investigating effects on Cognition, Behavior and Activities of Daily Living
International Clinical Psychopharmacology 2004;19:319-24.
43. **Strous RD**, Golubchik P, Maayan R, Mozes T, Tuati-Werner D, Weizman A, Spivak B.
Lowered DHEA-S Plasma Levels in Adult Individuals with Autistic Disorder
European Neuropsychopharmacology 2005;15:305-9

44. Lerer B, Segman RH, Tan E, Basile VS, Cavallaro R, Aschauer HN, **Strous RD**, Chong S, Verga M, Scharfetter J, Meltzer HY, Kennedy JL, Macciardi F.
Combined analysis of 635 patients confirms an age-related association of the serotonin 2A receptor gene with tardive dyskinesia and specificity for the non-orofacial subtype.
International Journal of Neuropsychopharmacology 2005;28:1-15.
45. **Strous RD**, Ratner Y, Gibel A, Ponizovsky A, Ritsner M
Longitudinal assessment of coping strategies at exacerbation and stabilization in schizophrenia
Comprehensive Psychiatry 2005;46:167-175.
46. Maayan R, **Strous RD**, Abou-Kaoud M, Weizman A.
The Effect of 17 β Estradiol Withdrawal on the Level of Brain and Peripheral Neurosteroids in Ovariectomized Rats
Neuroscience Letters 2005;384:156-61.
47. Nachshoni T, Ebert T, Abramovitch Y, Assael-Amir M, Kotler M, Maayan R, Weizman A, **Strous RD**.
Improvement of Extrapiramidal Symptoms following DHEA Administration in Antipsychotic Treated Schizophrenia Patients: A 7-Day Randomized, Double-Blind Placebo Controlled Trial
Schizophrenia Research 2005;79:251-256.
48. Shlosberg A, **Strous RD**
Long-Term Follow-up (32 years) of PTSD in Yom Kippur War Veterans
Journal of Nervous and Mental Disease 2005;193:693-6.
49. Laufer N, Maayan R, Hermesh H, Marom S, Gilad R, **Strous R**, Weizman A.
Involvement of GABA_A receptor modulating neuroactive steroids in patients with social phobia.
Psychiatric Research 2005;137:131-6.
50. **Strous RD**, Lapidus R, Viglin D, Kotler M, Lachman HM
Analysis of an Association between the COMT polymorphism and Clinical Symptomatology in Schizophrenia
Neuroscience Letters 2006;393:170-3.
51. **Strous RD**, Weiss M, Felsen I, Finkel B, Melamed Y, Kotler M, Laub D.
Video Testimony of Long-Term Hospitalized Psychiatrically Ill Holocaust Survivors
American Journal of Psychiatry 2005 162: 2287-2294.
52. Baruch Y, Kotler M, Lerner Y, Benatov J, **Strous RD**.
Psychiatry Admissions and Hospitalization in Israel: An Epidemiological Study of Where We Stand Today and Where We Are Going
Israel Medical Association Journal 2005;7:803–807.
53. **Strous RD**, Maayan R, Kotler M, Weizman A.
Hormonal Profile Effects following Dehydroepiandrosterone (DHEA) Administration to Schizophrenia Patients
Clinical Neuropharmacology 2005; 28:265-269.
54. Iancu I, **Strous RD**, Marchevsky S, Poreh A, Chelben Y, Kotler M
Psychiatric inpatients' reactions to the SARS epidemic: an Israeli survey
Israel Journal of Psychiatry and Related Sciences 2005;42:258-62.
55. Kipnis J, Cardon M, **Strous RD**, Schwartz M
Loss of autoimmune T cells correlates with brain diseases: implications for schizophrenia?

Trends in Molecular Medicine 2006;12:107-112.

56. Perl O, **Strous RD**, Dranikov A, Chen R, Fuchs S
Low levels of alpha7 nicotinic acetylcholine receptor mRNA on peripheral blood lymphocytes in schizophrenia and its association with illness severity
Neuropsychobiology 2006;53:88-93.
57. Mendelsohn A, **Strous RD**, Bleich M, Assaf Y, Hendler T
Regional Axonal Abnormalities in First-Episode Schizophrenia: Evidence Based on High b-value Diffusion Weighted Imaging
Psychiatry Research: 2006;146:223-229.
58. Spivak B, **Strous RD**, Shaked G, Shabash E, Kotler M, Weizman A.
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Journal of Clinical Psychopharmacology 2006;26:152-156.
59. **Strous RD**, Greenbaum L, Kanyas K, Merbl Y, Horowitz A, Karni O, Viglin D, Olender T, Deshpande SN, Lancet D, Ben-Asher E, Lerer B
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International Journal of Neuropsychopharmacology 2006;10:321-333.
60. **Strous RD**, Kupchik M, Roitman S, Schwartz S, Gonen N, Mester R, Weizman A, Spivak B
Comparison between Risperidone, Olanzapine, and Clozapine in the Management of Chronic Schizophrenia: A Naturalistic Prospective 12-Week Observational Study
Human Psychopharmacology 2006;21:235-243.
61. **Strous RD**, Bar F, Keret N, Lapidus R, Kosov N, Chelben J, Kotler M.
Analysis of Clinical Characteristics and Antipsychotic Medication Prescribing Practices of First Episode Psychosis: A Naturalistic Prospective Study.
Israel Journal of Psychiatry and Related Sciences 2006;43:2-9.
62. Ritsner MS, Gibel A, Ratner Y, Tsinovoy G, **Strous RD**
Improvement of sustained attention and visual and movement skills, but not clinical symptoms, after dehydroepiandrosterone augmentation in schizophrenia: a randomized, double-blind, placebo-controlled, crossover trial.
Journal of Clinical Psychopharmacology 2006;26:495-499.
63. Kupchik M, **Strous RD**, Erez R, Gonen N, Weizman A, Spivak B
Demographic and Clinical Characteristics of Motor Vehicle Accident Victims in the Community General Health Outpatient Clinic: A Comparison of Post-Traumatic Stress Disorder (PTSD) and Non-PTSD subjects
Depression and Anxiety 2007;24:244-50.
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Pharmacology, Biochemistry and Behavior 2006;85:415-421.
65. Lepkifker E, Kotler M, Horesh N, **Strous RD**, Iancu I
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EXHIBIT 12

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
SHMUEL ELIMELECH BRAUN, et. al.)	
)	
Plaintiff,)	Civ. No. 1:15-cv-01136-BAH
)	
v.)	
)	
THE ISLAMIC REPUBLIC OF IRAN, et al.,)	
)	
Defendants.)	
_____)	

EXPERT DECLARATION OF DR. RAEL STROUS

Re: Samuel Braun

I have been retained by the Plaintiffs in the matter of *Braun v. The Islamic Republic of Iran* to provide a report and testimony regarding the mental health of Samuel Braun.

Professional Qualifications

1. I am a Medical Doctor specializing in psychiatry. I am currently employed as the Deputy Hospital Director and Director of the Ambulatory Service of the Be'er Yaakov Mental Health Center located in Be'er Yaakov, Israel. I also serve as Full Professor, Department of Psychiatry at the Sackler Faculty of Medicine at the Tel Aviv University and maintain a small private practice in clinical psychiatry.

2. I received my medical degree in 1989 from the University of Witwatersrand in Johannesburg, South Africa. Between 1992 and 1996, I performed my residency in psychiatry at the Albert Einstein College of Medicine in the Bronx, New York. In 1996, I served as Chief Resident at the Bronx Psychiatric State Hospital. From 1996 through 1998, I performed a clinical research fellowship in psychopharmacology at the Commonwealth Research Center, Massachusetts Mental Health Center affiliated with the Harvard Medical School.

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Re. Samuel Braun

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3. Before embarking on my career in psychiatry, I served as an emergency room doctor and as a general physician in pediatrics and trauma.

4. I have approximately 150 peer reviewed research publications to my name including several in the field of chronic post-traumatic stress disorder (PTSD).

5. Based on my education and experience as outlined above, I have provided expert reports that were submitted as exhibits in *Biton v. The Palestinian Interim Self-Government Authority, et al.*, 01 CV 382 (RWR), *Gilmore v. The Palestinian Interim Self-Government Authority et al.*, 01-cv-00853 (GK), *Rubin v. Islamic Republic of Iran_01-1655* (RCL), *Ben Haim v. Islamic Republic of Iran*, 02-01811 (RCL) and *Kaplan v. Hezbollah, et al.*, No. 09-cv-646 (RWR) in the United States District Court for the District of Columbia, *Leibovitch v. The Syrian Arab Republic et al.*, 08 CV 01939 (WTH) in the United States District Court for the Northern District of Illinois, and in *Shatsky v. The Syrian Arab Republic et. al.*, 02-2280-RJL in the United States District Court of the District of Columbia. I testified at a deposition in, *Saperstein v. Palestinian Authority*, Case No. 0420225-CIV-Turnoff in the United States District Court for the Southern District of Florida. I have testified as an expert at one trial *Sokolow vs Palestinian Liberation Organization et al.*, 04-CV-397(GBD). In Israel, I have also submitted court mandated evaluations of psychiatric patients.

6. A copy of my curriculum vitae including a list of all publications authored by me within the preceding ten years is attached hereto.

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7. I have been asked to provide an evaluation for Samuel Braun. To prepare this evaluation, I examined Plaintiff Samuel Braun on 28 December 2015. Upon examining Samuel Braun, I prepared a written Psychiatric Evaluation for him. That written Psychiatric Evaluation represented my professional assessment of Samuel Braun. Accordingly, I incorporate by reference into this report the Psychiatric Evaluation regarding Plaintiff Samuel Braun dated 28 December 2015 (attached hereto).

Psychiatric Disorders

8. To facilitate understanding and analysis of the Psychiatric Evaluation, I am including a brief explanation of Persistent Complex Bereavement Disorder, Post-traumatic Stress Disorder and Anxiety Disorder which afflicts Samuel Braun as indicated in his Psychiatric Evaluation.

Persistent Complex Bereavement Disorder

9. Persistent Complex Bereavement Disorder (also known as Pathological Grief or Complicated Mourning) refers to a description of the normal mourning process that leads to chronic or ongoing mourning. The term "Pathological Grief" is applied to people who are unable to get over their grief despite the passage of time. It can take most people up to several years to get past a serious loss especially when the loss is associated with a violent and unexpected death. The person may experience intrusive distressing preoccupation with the deceased and wish to be reunited with the deceased. They may feel a sense of futility about the future, difficulty acknowledging the death, excessive irritability, bitterness or anger about the unfairness of the death and most significantly impaired social/occupational functioning. A pathological grief

Expert Declaration of Dr. Rael Strous

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reaction is usually diagnosed after a long time (one or more years) have passed and the grieving person is not improving.

Post-Traumatic Stress Disorder

10. Post-Traumatic Stress Disorder (“PTSD”) is a condition which develops from having been exposed to, or witnessing, life-threatening events. In addition, the traumatic event may be indirect, by hearing of a relative or close friend who has experienced the life threatening event. Indirectly experienced death must be accidental or violent. PTSD is characterized by distinct types of symptoms. These symptoms include avoidance, re-experiencing the event, and hyper-vigilance. Avoidance is the active escape from situations that the PTSD victim associates with the event. Re-experiencing is reliving the memory of the event. Hypervigilance is a cluster of symptoms that includes exaggerated startle response, inability to fall asleep and inability to stay asleep.

11. The disorder is also characterized by negative alterations in mood or cognitions which indicates a decline in someone’s mood or thought patterns. This can include memory problems that are exclusive to the event, negative thoughts or beliefs about one’s self or the world, distorted sense of blame for one’s self or others, related to the event, being stuck in severe emotions related to the trauma (e.g. horror, shame, sadness), severely reduced interest in pre-trauma activities and feeling detached, isolated or disconnected from other people.

12. Due to their suffering and symptoms, educational and employment prospects for PTSD victims are often lowered. Some have difficulty interacting with others.

13. Younger victims and females may be more likely to be susceptible to PTSD.

Expert Declaration of Dr. Rael Strous

Re. Samuel Braun

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14. Overall effects on PTSD patients from this illness are severe. Patients are easily distractible due to their exaggerated response to stimuli. Individuals face considerably lowered employment prospects and increased likelihood of difficulty in forming and maintaining interpersonal relationships. For those who are married or who are able to marry and have children the stress of childrearing will be compounded. The inability to relax and have a good time is extremely common with PTSD patients.

Anxiety Disorder

15. The essential feature of anxiety disorder is excessive anxiety and worry (apprehensive expectation) about a number of events or activities. The intensity, duration, or frequency of the anxiety and worry is out of proportion to the actual likelihood or impact of the anticipated event. The individual finds it difficult to control the worry and to keep worrisome thoughts from interfering with attention to tasks at hand. During the course of the disorder, the focus of worry may shift from one concern to another. The worries are excessive and typically interfere significantly with functioning. Individuals with anxiety disorder report distress due to constant worry and related impairment in social, occupational, or other important areas of functioning.

16. Samuel Braun displays some form of Persistent Complex Bereavement Disorder, Post-traumatic Stress Disorder and Anxiety Disorder either currently or in the past as a result of his daughter being killed in a terror attack in 2014.

Expert Declaration of Dr. Rael Strous

Re. Samuel Braun

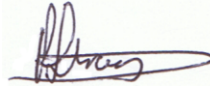
24 May 2016

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17. Based on my evaluation of Samuel Braun, I believe that many of his symptoms with which he has been diagnosed are likely to be present in varying degrees for a significant time to come and while it is impossible to state for any absolute certainty, many of the symptoms may even be permanent.

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

Dated: 24 May 2016

A handwritten signature in dark ink, appearing to read "R. Strous", is written over a light green rectangular background.

Rael Strous, MD

Rael Strous MD

Psychiatrist

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Tel: 972-544-628254

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USA Board Certified Psychiatrist

Israel Medical License: 31932

Israel Psychiatry License: 17270

28 December 2015

Psychiatric Evaluation: Samuel Braun

Date of Birth: : REDACTED

This evaluation is based on clinical interview and formal psychiatric evaluation, as well as my review of the discovery materials in this case as listed in my introduction. My opinions are stated within a reasonable degree of medical certainty.

Identifying Information

Samuel Braun is a 26-year-old male USA citizen currently residing in Jerusalem, Israel with his wife and newborn child. He was born in Los Angeles, California. He is the oldest of 4 siblings. He has lived in Israel for the past 4 years as a student of religious teachings (*Kollel yeshiva*). He has been married for the past 3 and a half years.

Presenting Problem

On 22 October 2014 he travelled with his wife and daughter (11 months and 6 days old) in order for his daughter to visit for the first time the holy Western Wall in the old city of Jerusalem. On the way back from the visit, he recalls wanting to visit his

wife's sister. They took a light rail train from the old city to French Hill in Jerusalem. They alighted from the train and were on the platform when suddenly a car drove directly into them. He recalls that he was pushing the baby carriage at the time. Following the sudden impact, he remembers how his daughter flew out the carriage after the car hit them "head on". His baby hit the ground with her head. He does not remember whether he or his wife picked up their baby, but he distinctly recalls how her head was deformed from the impact. The baby was not responding. During the impact, he himself was thrown into the side of the train. He is not sure if his injury of broken ribs and torn knee ligament was as a result of the car impact or his hard landing following the impact. He reports that to this day he still suffers from pain in the knee as a result of the injury sustained in the terror event.

He recalls how he tried to talk to his baby and revive her, however with no success. He informs that his daughter was not pronounced dead at the scene. Rather, a few hours later in the hospital, they were informed by a doctor that their baby had died from irreversible injuries sustained from being hit by the car.

Samuel indicates that at that moment he heard that his only child had died, his world immediately came "crashing down". He felt a "tremendous lack of stability" and was devastated. He reports that he waited 2 years for her. He felt very much attached to her. He says that she was "very cute" and was the "light of their lives". To lose her so suddenly and in such a manner was "absolutely horrible" for him. He felt "disoriented, crushed, intense pain and overwhelmed". The experience "finished" him off and he felt his life could never be the same again. To this day it is still "very very hard" to deal with. He reports that during the initial 7 days of mourning he felt numb due to the magnitude of the tragedy.

Long-term Physical and Psychological Sequelae Following the Event

Following the initial agony and loss that he experienced, he continued to suffer in a manner that affected many aspects of his life – most notably his relationship with his wife and his studies. Due to his long term difficulties and suffering, he began to see a psychologist (David Levin) on an individual basis. This began in May/June 2015.

He reported that soon after, his wife became pregnant. This was a mixed blessing coming so soon after the loss of their first child. On the one hand it was wonderful that they were about to have a child to care for which would hopefully compensate in some small manner for the loss of Chaya Zissel, but on the other hand the loss together with the emotional roller coaster of pregnancy "due to hormones" made the time very difficult with Chana crying a great deal during this period. He struggled to deal with his mixed emotions. He tried to ignore the pain as he was recommended to do so by his Rabbi. However he was unable to do so and this did not work for him and his wife. He tried to be numb to his pain in the months after the event. However he simply could not succeed in this. He felt that he needed to grieve and needed to try to put his life together again despite the devastation that he was experiencing. It was during this time that he especially recognized the need for therapy in order to cope and function under the circumstances no matter how hard the process may be for him. He mentioned that due to him and his wife dealing with the loss in a different manner, some inevitable tension developed between the two.

He reports that over the long term since the loss of his daughter, his function was significantly affected. This is manifested especially by the following:

1. Diminished ambition to achieve.
2. Decreased drive for success.
3. Decreased focus and concentration in studies.
4. Not able to "move on". He simply feels "stuck".
5. Impatient with everyone.
6. Constantly anxious and on edge.

H reports that he became very judgmental of others – since he felt that no one could understand what he was going through due to the enormity of his loss. Thus he often would become annoyed by people going on with their lives, oblivious to what he was going through.

PTSD symptomatology:

1. He reported some flashbacks initially in the first few months.
2. He is still hypervigilant in the streets. He therefore always walks close to the wall on the street, well away from the curb.

3. He reports no dreams or nightmares of the event.
4. He is very sensitive to loud noises (this though is improving lately). Loud noises cause him to suddenly "jolt".
5. His avoidance of situations which remind him of what he experiences is expressed in him avoiding trains, if at all possible, and the neighborhood where the terror event took place.

He reports that he is trying to improve his feels of being on edge, however this still exists. He also used to be substantially more relaxed. For example, he very rapidly becomes nervous and anxious when he is not able to contact his wife. This never used to be the case and has become a quality of his personality since the loss.

A very significant long term repercussion on his life since the terror event has been the effects that the loss has had on his relationship with his wife. He reports that he and his wife dealt differently to the trauma and loss. He realizes that he struggled to understand his wife's manner of dealing with the tragedy and that this placed strain on their marriage relationship. In addition to his marriage being affected, his relationships with friends were also changed for the worse since he felt that no one could understand his pain. He reports that he found it difficult to express the extent of his frustration with people. This was compounded by his feeling of loss of stability in life. Since the traumatic event and loss he felt that he could not take anything for granted anymore and lived with a constant underlying sense of fear. He feels to this day that nothing is safe anymore in life. For a long time he felt paralyzed and still feels stymied in his ambitions for the future. Much of his insecurity and anxiety was expressed in his inability to return to his primary preoccupation – studying of religious texts. Thus during the months after the event, he displayed considerable instability of direction as noted in frequent switching of places of higher study. He felt he was in desperate need of distraction from his pain and the need to feel fulfilled despite the background of the tragedy that had just transpired in his life. For a year after the loss, he reports that his productivity in study dramatically diminished. Only more recently it is starting to improve.

Due to his low mood in the months subsequent to his personal tragedy and subsequent low mood and relationship struggles, he began to see a psychologist. This was in

addition to meeting initially with a psychiatrist Dr Blumenthal, a specialist in PTSD. He met with him in the beginning in person, and then subsequently had follow-up via telephone (on Dr Blumenthal's return to the USA).

Previous Psychiatric Illnesses

Mr. Braun reports no psychiatric history of any type prior to the terror event.

Alcohol or Substance History

He reports no use of any drugs or smoking.

Current Medical Illnesses

Denies any apart from the knee injury since being run over by the car in the terror attack.

Family Psychiatric History

Denies

Mental Status

General appearance: Appropriately dressed and groomed. Dressed in ultra-orthodox clothing.

Behavior: Cooperative. Obvious nervousness initially, but able to express his pain and distress in verbal terms. Exhibits clear distress on recalling his relationship with his daughter and the pain that her loss was for him despite her young age.

Affect: Dysthymic affect when discussing the long effects the death of his daughter had on him.

Mood: Admits to still feeling down when talking about the terror event and the death of his daughter. Despite his ability to talk about it in open terms, he reports that the pain is very deep and that no one can understand what he went through and goes through still to this day.

Speech: Clear and coherent

Thought disorder: No evidence of formal thought disorder.

Thought Content: No evidence of delusional content.

Perceptual Disorder: No evidence of past or present hallucinations. No evidence of psychosis.

Neurocognitive and neuropsychiatric status: fully alert and oriented. Concentration and attention ability is intact.

Impulse Control: Intact.

Insight: Good.

Judgment: Good.

Reliability of Mental status and interview: very good.

Psychological Testing

HAM-D and HAM-A rating scales, PTSD scale (PDS) and Pathological Grief screening questionnaires were administered.

The Hamilton Depression rating scale (also known as the Ham-D) is the most widely used clinician-administered depression assessment scale. The original version contains 17 items (HDRS17) relating to symptoms of depression experienced over the past week. **The Hamilton Anxiety Rating Scale** (HAM-A) is a widely used and well-validated tool for measuring the severity of a patient's anxiety. The HAM-A probes 14 parameters.

The **Post-Traumatic Stress Diagnostic Scale (PDS)** is a 49-item self-report measure used in clinical or research settings to measure severity of Post-traumatic Stress Disorder (PTSD) symptoms related to a single identified traumatic event. The PDS has four sections. Part 1 is a trauma checklist. In Part 2, those completing the scale are asked about this most disturbing traumatic event including when it happened, if anyone was injured, perceived life threat, and whether the event resulted in helplessness or terror. Part 3 evaluates 17 PTSD symptoms. Respondents are asked to rate the severity of the symptom from 0 ("not at all or only one time") to 3 ("5 or more times a week / almost always"). Part 4 assesses influence of the symptoms in their lives.

A semi-structured interview format to facilitate assessment of complicated grief, developed by Shear et al., was administered (**Interview Guide for Complicated Grief**). This is a screening rating scale with two Parts (A and B). The first section requires at least one of 4 symptoms to be endorsed indicating experience over the past

month. The second section requires at least two of 8 symptoms to be endorsed. In addition, the **Brief Grief Questionnaire** developed by Shear and Essock was administered consisting of 5 screening questions (0-2) for Complicated Grief disorder.

Scores indicate presence of mild depression (score of 10 on the Ham-D), mild anxiety (score of 17 on the Ham-A), moderate to severe PTSD (score of 22 on the PDS) and presence of pathological/complicated grief (2 of 4 on Part A, 8 of 8 on Part B; Score of 7 on Brief Grief Questionnaire). Please see attached documents with detailed scoring.

Report of Psychologist Dr Norman Blumenthal

Spoke with Mr. Braun on several occasions after the traumatic event:

28 October 2014 – met with Mr. Braun and dealt with his trauma and early grief.\

10 November 2014 – described Mr. Braun's "experiencing classic post trauma reaction and having very hard time resuming his routine".

10 December 2014 – described Mr. Braun being "beset by flashbacks and phobic reactions to heavy traffic and driving". He also described Mr. Braun as "valiantly trying to overcome trauma by gradual exposure . He describes that "as the trauma dissipates, he feels the void more." Dr Blumenthal notes that Mr. Braun is "still not attending the yeshiva on a regular basis".

In a further document, Dr Blumenthal noted that "Mr. Braun, who was simultaneously injured during the assault, has displayed distinct symptoms of a Post-Traumatic Stress Disorder (ICD 9 code 309.81) including flashbacks, startle reactions and unprecedented phobic reactions to activities associated with the trauma (e.g. driving, crossing busy intersections and the like)."

Report of Psychotherapist David Levine MSc

David Levine, Mr. Braun's treating psychotherapist reports that "the initial stage of the therapy focused on helping Mr. Braun come to terms with the devastation of the loss, the trauma that was experienced both by him and his wife, as well as the challenges that have arisen in the aftermath." He diagnosed him with "a low grade General Anxiety Disorder, which makes every day challenges even harder to navigate." He gave an example of the challenges Mr. Braun faced including "the anxiety experienced just by having to live and exist in day to day reality, such as

walking down the street and frequenting public places often overwhelms him out of fear of another attack. In addition, Mr. Braun's anxiety impairs his decision making capacity."

Summary of Observations

Samuel Braun is a 26 year old male with signs and symptoms of partial PTSD and pathological grief since his 3-month old daughter died in a terror attack after been run over. Her loss took a heavy toll on Mr. Braun and led to a marked change in his mood and behavior with him in the months since the event. In addition, the trauma affected his interpersonal interactions, especially with his wife, which represented a marked change from before the loss.

Prognosis

Samuel Braun suffered tremendous pain in light of losing his daughter in a terror car event in 2014. Despite his daughter's young age of 3 months, as his first child, he reported feeling extraordinarily close with her and therefore clearly expresses how his life has been irreversibly affected in light of her loss. It is not expected that his deep feelings of grief affecting many areas of his personal and interpersonal functioning will resolve in the short term, and they will continue to affect him for a long time to come.

Diagnostic Formulation

309.89 (F43.8) Persistent Complex Bereavement Disorder; (moderate) with traumatic bereavement

309.81 (F43.10) Post-traumatic Stress Disorder (partial)

300.09 (F41.8) Other Specified Anxiety Disorder (generalized anxiety not occurring more days than not in all 3 of 6 core symptoms)



Rael Strous MD

Attachments: HAM-D rating scale results

HAM-A rating scale results

PDS scale

Pathological Grief Screening (Interview Guide for Complicated Grief, Brief Grief Questionnaire)

Curriculum Vitae (Rael Strous MD)

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Current Title and Affiliation:

Director Chronic Inpatient Unit, Beer Yaakov Mental Health Center

Associate Professor, Department of Psychiatry, Sackler Faculty of Medicine, Tel Aviv University

EDUCATION

- 1984 – 1989 Medical School, *University of Witwatersrand*, Johannesburg, South Africa, MBBCh
 1992 – 1996 Psychiatry residency, *Albert Einstein College of Medicine*, New York (USA Board Certification)
 1996 – 1998 Clinical Research Fellowship in Psychopharmacology, Massachusetts Mental Health Center, *Harvard Medical School*, Boston, USA

ADDITIONAL STUDIES

- 1987-1989 Psychology, Theological Bioethics, University of South Africa, Pretoria, South Africa
 1996 Neuroimaging Mini-Fellowship, Columbia University, NY, USA
 1995 Board Certification Forensic Examination, American College of Forensic Examiners

PROFESSIONAL EXPERIENCE

- 1990 Internship, Hillbrow Hospital, Medicine, Surgery, Johannesburg, South Africa
 1991 Alexandra Health Center, Ambulatory Med., General physician, Johannesburg, South Africa
 1991 Johannesburg General Hospital, Emergency Room MD
 1992-1996 Psychiatry Resident, **Albert Einstein College of Medicine**, Bronx Municipal Hospital, North Central Bronx Hospital, Montefiore Hospital (Chief Resident Bronx Psychiatric State 1995/6)
 1996-1998 Research Fellow, Commonwealth Research Center, Massachusetts Mental Health Center, **Harvard Medical School**
 1999–present Beer Yaakov Mental Health Center, Director Chronic Inpatient Unit (from 2003)
 2001-present Sackler Faculty of Medicine, Tel Aviv University Lecturer and Tutor
 Medical Students in Psychiatry
 2002-2006 Member Physician Committee, Beer Yaakov Mental Health Center Psychiatry
 2002-present Chairman Medication Committee, Beer Yaakov Mental Health Center
 2003-2006 Israel Society of Biological Psychiatry, Executive Board Member
 2003-2006 Israel Society of Biological Psychiatry Annual Conference Committee Member
 2004-present World Psychiatry Association (WPA) Section on Religion Committee Member
 2005-2006 World Psychiatry Association (WPA) Section, Committee Member
 on Law and Psychiatry
 2006, 2009, 2011 Israel Psychiatry Association Annual Congress, Scientific Organization Committee Member
 2005-2010 Member Clinical Teaching Committee, Sackler Faculty of Medicine, Tel Aviv University

ACADEMIC AND RESEARCH ACTIVITIES, SACKLER FACULTY OF MEDICINE

2009-2010: Director, New York State/American Program, Sackler Faculty of Medicine, Tel Aviv University
 2008-2010 Member Medical School Curriculum Committee
 2008-2010 Member Four Year Medical School Program Steering Committee
 2003-present: Member Medical School Admissions Evaluation Team
 2003-2008: Coordinator medical student exam in psychiatry (USA and Israeli medical students)
 2003-2006: Executive Board Member, Israel Society of Biological Psychiatry
 2005-present Member Editorial Board: Law and Medicine Journal
 2005-2010: Member Clinical Teaching Committee, Sackler Faculty of Medicine
 2006-present: Deputy Editor, Israel Journal of Psychiatry
 2008-2010: Member Planning Committee for four-year medical degree, Sackler Faculty of Medicine

ACADEMIC AND PROFESSIONAL AWARDS

1988 Alice Cox Award, Best medical student in psychiatry, University Witwatersrand Medical School
 1992-5 Top psychiatric resident in annual national PRITE examination, Department of Psychiatry
 Albert Einstein College of Medicine (top 1% of all USA psychiatry residents)
 1994/95 Burroughs Wellcome Leadership Award, American Medical Association (AMA)
 1994/95 Mead Johnson Fellowship Award, American Psychiatric Association (APA)
 1995 Young Investigator Award International Congress on Schizophrenia Research, USA
 1995 Lilly Resident Research Award, American Psychiatric Association (APA)
 1995/96 Young Scientist Award, 8th Biennial Winter Workshop on Schizophrenia (Switzerland)
 1996 Young Investigator Award, Society of Biological Psychiatry
 1996/7 Young Researcher Award, American Neuropsychiatric Association
 1996 Dupont-Warren Fellowship Award, Department of Psychiatry, *Harvard Medical School*
 1996 New Investigator Award (NCDEU)/National Institute Mental Health, USA (NIMH)
 2000 Rafaelsen Fellowship Award, Collegium Internationale Neuropsychopharmacologicum (CINP)
 2001 Fellowship Award, World Congress of Biological Psychiatry
 2002 Fellowship Award, European College of Neuropsychopharmacology (ECNP)
 2002 Team Award for Best Research Paper, Israel Psychiatry Association
 2002 Clinical Research Award: Best Clinical Research Paper, Israel Society of Biological Psychiatry
 2004 Outstanding Young Investigator Award, International Congress of Biological Psychiatry
 2004 Donald Cohen Fellowship Award, International Association of Child Psychiatry and Allied
 Professions (IACAPAP)
 2004 **Outstanding Teacher/Lecturer of the Year**, Sackler Faculty of Medicine, Tel Aviv University
 2006 Certificate of Honor (research presentation), Israel Society for Biological Psychiatry
 2007 **Outstanding Teacher/Lecturer of the Year**, Sackler Faculty of Medicine, Tel Aviv University
 2010 **Immigrant Scientist Recognition Award** from Israel Ministry of Immigration
 2010 **Outstanding Employee of Year**, Beer Yaakov Mental Health Center

GRANTS AWARDED

2000 Ministry Of Science: Chief Scientist Award, PRINCIPAL INVESTIGATOR, Clinical study of first-episode psychosis
 2000 Israel Institute of Psychobiology Grant, PRINCIPAL INVESTIGATOR, Functional MRI investigation in first-episode schizophrenia
 2000 Guggenheim Foundation Grant, PRINCIPAL INVESTIGATOR, Genetic polymorphisms in violence and aggression
 2000 Israel Ministry Of Defense Research Grant, PRINCIPAL INVESTIGATOR, Novel pharmacological management of treatment resistant PTSD

- 2000 NARSAD Young Investigator Award, PRINCIPAL INVESTIGATOR, Novel augmentation strategies with neurosteroids in schizophrenia
- 2002 Stanley Foundation Grant, CO- PRINCIPAL INVESTIGATOR, Neurosteroids in schizophrenia
- 2002 India-Israel Research Project, CO-INVESTIGATOR, Genetics of Schizophrenia
- 2002 Dreyfuss Health Foundation, PRINCIPAL INVESTIGATOR, Treatment resistant schizophrenia
- 2003 Stanley Foundation Grant, PRINCIPAL INVESTIGATOR, Methyl donors in schizophrenia
- 2003 NARSAD Young Investigator Award, PRINCIPAL INVESTIGATOR, Neurosteroids and management of treatment resistance and medication related side-effects in schizophrenia
- 2007 Mordechai Ofer Research Award Grant, Tel Aviv University, PRINCIPAL INVESTIGATOR, Psychiatry during the Nazi era, its relevance today and ethical ramifications for current practice

MEMBERSHIP IN PROFESSIONAL SOCIETIES

- 2003-present World Society of Biological Psychiatry
- 2003 International Group Therapy Association
- 2001-present European College of Neuropsychopharmacology (ECNP)
- 1999-present Israel Medical Society
- 1999-present Israel Psychiatric Association
- 1999-present Israel Society for Biological Psychiatry
- 1996 American College of Forensic Examiners
- 1996-8 Massachusetts Society of Medicine, USA
- 1994-8, 2006 International Society of Political Psychology
- 1992-1998 American Psychiatric Association
- 1990 South African Medical & Dental Council
- 1990 General Medical Council (Great Britain)

ACTIVE PARTICIPATION IN SCIENTIFIC MEETINGS (Poster or Lecture presentation)

- 1992 American Psychiatric Association, USA
- 1993 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Conference of Political Psychology, Boston, USA
Institute of Psychiatric Services, San Diego, USA
- 1994 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Congress on Schizophrenia Research, Colorado, USA
Institute of Psychiatric Services, Boston, USA
- 1995 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Congress on Schizophrenia Research, Switzerland
New Clinical Drug Evaluation Unit (NCDEU), Boca Raton, USA
American Neuropsychiatric Association, Orlando, USA
- 1996 American Psychiatric Association, USA
- 1997 Society of Biological Psychiatry, Kfar Giladi, Israel
- 1998 Israel Society of Neuroscience, Eilat, Israel
IBRO, International Brain Research Organization, Jerusalem, Israel
- 1999 CINP, Brussels, Belgium

- Israel Psychiatry Association, Jerusalem, Israel
 Israel Society of Neuroscience, Eilat, Israel
- 2001 American Psychiatric Association, New Orleans, USA
 World Congress Biological Psychiatry, Berlin, Germany
- 2002 Association of European Psychiatrists, Stockholm, Sweden
 ECNP, Barcelona Spain
 Pharmacogenetics, Mayo Clinic, Minnesota, USA
- 2003 European Conference on Violence in Clinical Psychiatry, London, England
 ACNP, Puerto Rico, USA
- 2004 International Congress of Biological Psychiatry
 Society of Biological Psychiatry, Hagoshrim, Israel
 International Congress of Neuropsychiatry, Athens, Greece
- 2005 Society of Biological Psychiatry, Hagoshrim, Israel
 International Conference on Medical Ethics, Haifa
 American Psychiatric Association, Atlanta, USA
 World Congress Biological Psychiatry, Vienna, Germany
- 2006 Nefesh Israel, Jerusalem (**Lecturer**)
 Society of Biological Psychiatry, Hagoshrim, Israel (**Lecturer**)
 Israel Psychiatry Association, Tel Aviv (**Lecturer**)
 International Society of Political Psychology, Barcelona, Spain (**Lecturer**)
 World Association Medical Law, Toulouse, France (**Lecturer**)
 ECNP (European College Neuropsychopharmacology) Paris, France
- 2007 Society of Biological Psychiatry, Hagoshrim, Israel (**Lecturer**)
 World Psychiatry Association: Coercive Treatment in Psychiatry, Dresden, Germany
(Lecturer)
- 2008 Society of Biological Psychiatry, Israel
- 2009 Nahariah Conference on Holocaust (**Lecturer**)
 Israel Medical Association Conference (**Lecturer**)
 Brother-Other: Israel/Poland Mental Health Association, Krakow, Poland (**Lecturer**)
- 2010 CINP, Hong Kong (**Lecturer**)
 Society for International Research of Schizophrenia (SIRS), Florence, Italy (**Lecturer**)
 International Conference on 'Integrating Traditional Healing Practices into Counseling
 Psychology, Psychotherapy and Psychiatry.' Durban, South Africa, (**Lecturer**)
- 2011 International Conference, Medical Ethics, Bochum, Germany (**Lecturer**)
 International Conference for Clinical Ethics and Consultation, Amsterdam, Holland
(Lecturer)
 ECNP, Paris, France (**Lecturer**)

REVIEWER FOR FOLLOWING JOURNALS:

Archives of General Psychiatry, American Journal of Psychiatry, British Journal of Psychiatry,
 Neuropharmacology, Journal of Medical Ethics, European Journal of Neuropsychopharmacology,
 Journal of Nervous and Mental Disorders, Psychiatry Research, Schizophrenia Research, Biological
 Psychiatry, Schizophrenia Bulletin, Israel Journal of Psychiatry, Israel Medical Association Journal

PUBLICATIONS (150 in Total)**Original Research Articles**

1. **Strous, RD.**, Cowan, N., Ritter, W., Javitt, D.C.
Auditory sensory (“echoic”) memory dysfunction in schizophrenia.
American Journal of Psychiatry;152:10, 1517-1519, 1995.
2. Javitt, D.C , **Strous, RD.**, Grochowski, S., Ritter, W, Cowan, N.
Impaired precision, but normal retention, of auditory sensory memory information in schizophrenia.
Journal of Abnormal Psychology;106:315-324, 1997.
3. **Strous RD.**, Bark N, Parsia S, Volavka J, Lachman H. M.
Analysis of a functional Catechol-O-Methyltransferase gene polymorphism in schizophrenia:
Evidence for association with aggressive and antisocial behavior.
Psychiatry Research;69:71-77, 1997.
4. **Strous RD.**, Bark N, Woerner M, Lachman HM.
Lack of an association of a functional Catechol-O-Methyltransferase gene polymorphism in
schizophrenia.
Biological Psychiatry;41:493-495, 1997.
5. Green AI, Zimmet S, **Strous RD.**, Schildkraut JJ.
Substance use disorder and schizophrenia: Do patients with schizophrenia have a reward deficiency
syndrome that can be ameliorated by clozapine.
Harvard Review of Psychiatry;6:289-296, 1999.
6. Zimmet SV, **Strous RD.**, Burgess ES, Kohnstamm S, Green AI.
Effects of clozapine on substance use in patients with schizophrenia and schizoaffective
disorder: a retrospective survey.
Journal of Clinical Psychopharmacology;20:94-8, 2000.
7. **Strous RD.** Shtain M, Oselka-Goren H, Lustig M, Stryjer R, Zerzion M, Baruch Y, Chelben J.
Anticipatory Reactions of Psychiatric Inpatients to the Year 2000.
Journal of Nervous and Mental Disease 2000;188:786-788.
8. Ilani T, Ben-Shachar D, **Strous RD.**, Mazor M, Sheinkman A, Kotler M, Fuchs S.
A novel peripheral marker for schizophrenia: Increased levels of D3 dopamine
receptor mRNA in blood lymphocytes.
Proceedings of the National Academy of Sciences (PNAS), USA 2001, 98:625-8.
9. **Strous RD.** Spivak B, Yoran-Hegesh R, Maayan R, Averbuch E, Kotler M, Mestor R,
Weizman A.
Analysis of neurosteroid levels in attention deficit hyperactivity disorder.
International Journal of Neuropsychopharmacology 2001 ;4:259-64
10. **Strous RD.** Pollack S, Robinson D, Sheitman B, Lieberman JA. Seasonal
Admission Patterns in First Episode Psychosis, Chronic Schizophrenia and Non-
Schizophrenic Psychoses
Journal of Nervous and Mental Diseases 2001;189:642-4.

11. Szeszko PR, **Strous RD**, Goldman RS, Ashtari M, Knuth KH, Lieberman JA, Bilder RM. Neuropsychological correlates of hippocampus volumes in first-episode schizophrenia. American Journal of Psychiatry 2002;159:217-26.
12. Segman RH, Heresco-Levy U, Yakir A, Goltser T, **Strous RD**, Greenberg D, Lerer B. Interactive effect of cytochrome P450 17 α -hydroxylase and dopamine D3 receptor gene polymorphisms on abnormal involuntary movements in chronic schizophrenia Biological Psychiatry. 2002;;51:261-3.
13. Green AI, Burgess ES, Zimmet SV, Dawson R, **Strous RD** Alcohol and Cannabis use in schizophrenia: Effects of risperidone vs. clozapine. Schizophrenia Research 2003;60:81-5.
14. Stryjer R, **Strous RD**, Bar F, Werber E, Shaked G, Buhiri Y, Kotler M, Weizman A, Rabey JM Beneficial effect of donepezil augmentation in the management of comorbid schizophrenia and dementia Clinical Neuropharmacology 2003;26:12-7
15. **Strous RD**, Maayan R, Lapidus R, Stryjer R, Lustig M, Kotler M, Weizman A Value of Dehydroepiandrosterone (DHEA) Augmentation in the Management of Negative Symptoms in Schizophrenia Archives of General Psychiatry 2003;60:133-141
16. Stryjer R, **Strous RD**, Shaked G, Bar F, Feldman B, Kotler M, Polak L, Rosenzweig S, Weizman A Amantadine as augmentation therapy in the management of treatment resistant depression. International Clinical Psychopharmacology 2003;18:93-6.
17. **Strous RD**, Stryjer R, Keret N, Bergin M, Kotler M Reactions of Psychiatric and Medical Inpatients to Terror and Security Instability in Israel Journal of Nervous and Mental Disorders 2003;191:126-129.
18. Shifman S, Bronstein M, Sternfeld M, Shalom A, Lev-Lehman E, Grisaru N, Karp L, Kotler M, Knobler HY, Reznik I, Schiffer R, Shinar E, Spivak B, **Strous RD**, Swartz-Vanetik M, Weizman A, Yakir B, Risch N, Zak NB, Darvasi A. A highly significant association between a COMT haplotypes and schizophrenia. American Journal of Human Genetics 2002 6:1296-302
19. Stryjer R, **Strous RD**, Bar F, Poyurovsky M, Weizman A, Kotler M Treatment of neuroleptic induced akathisia with the 5HT_{2a} antagonist trazodone. Clinical Neuropharmacology 2003;26:137-41.
20. **Strous RD**, Nolan K, Lapidus R, Saito T, Lachman HM Aggressive behavior in schizophrenia is associated with the low enzyme activity COMT polymorphism: A replication study. American Journal of Medical Genetics 2003;120:29-34.
21. Stopkova P, Saito T, Papolos DF, Stryjer R, **Strous RD**, Lachman HM Polymorphism screening of PIP5K2A: A candidate gene for 10p-linked psychiatric disorders American Journal of Medical Genetics 2003;123B:50-58.
22. Vered Y, Golubchik P, Mozes T, **Strous RD**, Nechmad A, Mester R, Weizman A, Spivak B. The platelet poor plasma 5-HT response to carbohydrate rich meal administration in adult autistic patients compared to normal controls.

Human Psychopharmacology 2003;18:395-9.

23. Perl O, Ilani T, **Strous RD**, Lapidus R, Fuchs S
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FASEB Journal 2003;17:1948-1950.
24. Segman, R.H., Goltser, T., Heresco-Levy U., Finkel, B., **Strous, RD.**, Shalem, R., Schlafman, M., Yakir, A., Greenberg, D., Lerner, A., Shelevoy, A., Lerer, B.:
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Pharmacogenomics J. 2003;3:277-83.
25. Maayan R, Spivak B, **Strous RD**, Nechmad A, Yoran-Hegesh R, Averbuch E, Mester R, Weizman A
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Neuropsychobiology. 2003;48(3):111-5.
26. Kotler M, **Strous RD**, Reznik I, Shwartz S, Weizman A, Spivak B
Sulpiride Augmentation of Olanzapine in the Management of Treatment-Resistant Chronic Schizophrenia: Evidence for Improvement of Mood Symptomatology
International Clinical Psychopharmacology 2004;19:23-26.
27. Maayan R, Kaplan B, **Strous RD**, Abou Kaud M, Fisch B, Shinnar N, Weizman A
The influence of parturition on the level and synthesis of sulfated and free neurosteroids in rats
Neuropsychobiology 2004;49:17-23.
28. Shaked G, Renert N, Mahuda I, **Strous RD**
Psychiatric Care in the Middle East: A "Mental Health Supermarket" in the Town of Lod
Psychiatric Rehabilitation Journal 2004;27:207-211.
29. **Strous RD**, Ofir D, Brodsky O, Yakirevitch J, Drannikov A, Navo N, Kotler M
Reactions of Psychiatric Inpatients to the Threat of Biological and Chemical Warfare in Israel
Journal of Nervous and Mental Disorders 2004;192:318-323.
30. Reznik I, Yavin I, Stryjer R, Spivak B, Gonen N, Kotler M, **Strous RD**, Weizman A, Mester R.
Clozapine in the treatment of obsessive-compulsive symptoms in schizophrenia. A case series study.
Pharmacopsychiatry 2004 Mar;37(2):52-6.
31. Ritsner M, Maayan R, Gibel A, **Strous RD**, Modai I, Weizman A.
Elevation of the Cortisol/Dehydroepiandrosterone and Cortisol/Dehydroepiandrosterone Sulfate Ratios in Medicated Schizophrenia Inpatients.
European Neuropsychopharmacology 2004;14:267-273.
32. **Strous RD**, Alvir J, Robinson D, Sheitman B, Chakos M, Lieberman JA. Premorbid function in Schizophrenia, relation to baseline symptoms, treatment response and medication side-effects.
Schizophrenia Bulletin 2004;30:265-78
33. **Strous RD**, Strjyer R, Ofir D, Weiss M, Bar F, Baruch Y, Kotler M
DSMIV self-evaluation by psychiatrists.
Israel Journal of Psychiatry 2004;41:197-207.

34. Lerner V, Libov I, Kotler M, **Strous RD**
Combination of Atypical Neuroleptics in Treatment of Resistant Schizophrenic and Schizoaffective Patients
Progress in Neuro-Psychopharmacology and Biological Psychiatry 2004;28:89-98.
35. Stryjer R, **Strous RD**, Bar F, Shaked G, Shiloh R, Rozenzweig S, Grupper D, Buchman N, Kotler M, Rabey JM, Weizman A.
Donepezil augmentation of clozapine monotherapy in schizophrenia patients: a double-blind cross over study.
Human Psychopharmacology: Clinical & Experimental 2004;19:343-6.
36. Shifman S, Bronstein M, Sternfeld M, Pisanté A, Weizman A, Reznik I, Spivak B, Grisaru N, Karp L, Schiffer R, Kotler M, **Strous RD**, Swartz-Vanetik M, Y. Knobler HY, Shinar E, Yakir B, Zak NB, Darvasi A.
COMT: A common susceptibility gene in bipolar disorder and schizophrenia
American Journal of Medical Genetics 2004;128B:61-4.
37. Spivak B, Golubchik P, Mozes T, Vered Y, Weizman A, **Strous RD**
Low Platelet-Poor Plasma Levels of Serotonin in Adult Autistic Patients
Neuropsychobiology. 2004;50(2):157-60
38. Ilani T, **Strous RD**, Fuchs S
Dopaminergic regulation of immune cells via D3 dopamine receptor: a pathway mediated by activated T cells.
FASEB Journal. 2004 ;18:1600-2.
39. Bhatia T, Sabeeha MR, Shriharsh V, Garg K, Segman RH, Uriel HL, **Strous R**, Nimgaonkar VL, Bernard L, Deshpande SN.
Clinical and familial correlates of tardive dyskinesia in India and Israel.
Journal Postgraduate Medicine. 2004;50:167-72.
40. Stopkova P, Saito T, Papolos DF, Vevera J, Paclt I, Zukov I, Bersson YB, Margolis BA, **Strous RD**, Lachman HM.
Identification of PIK3C3 promoter variant associated with bipolar disorder and schizophrenia.
Biological Psychiatry 2004 55:981-988.
41. **Strous RD**, Maayan R, Lapidus R, Goredetsky L, Zeldich E, Kotler M, Weizman A.
Increased Circulatory Dehydroepiandrosterone (DHEA) and Dehydroepiandrosterone-Sulphate (DHEA-S) in First-Episode Schizophrenia: Relationship to Gender, Aggression and Symptomatology.
Schizophrenia Research 2004;71:427-34.
42. Mendelsohn E, Rosenthal M, Bohiri Y, Werber E, Kotler M, **Strous RD**.
Rivastigmine Augmentation in the Management of Chronic Schizophrenia with Comorbid Dementia: An Open-Label Study investigating effects on Cognition, Behavior and Activities of Daily Living
International Clinical Psychopharmacology 2004;19:319-24.
43. **Strous RD**, Golubchik P, Maayan R, Mozes T, Tuati-Werner D, Weizman A, Spivak B.
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EXHIBIT 11

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

<hr/>)	
SHMUEL ELIMELECH BRAUN, et. al.)	
)	
Plaintiff,)	Civ. No. 1:15-cv-01136-BAH
)	
v.)	
)	
THE ISLAMIC REPUBLIC OF IRAN, et al.,)	
)	
Defendants.)	
<hr/>)	

EXPERT DECLARATION OF DR. RAEL STROUS

Re: Chana Braun

I have been retained by the Plaintiffs in the matter of *Braun v. The Islamic Republic of Iran* to provide a report and testimony regarding the mental health of Chana Braun.

Professional Qualifications

1. I am a Medical Doctor specializing in psychiatry. I am currently employed as the Deputy Hospital Director and Director of the Ambulatory Service of the Be'er Yaakov Mental Health Center located in Be'er Yaakov, Israel. I also serve as Full Professor, Department of Psychiatry at the Sackler Faculty of Medicine at the Tel Aviv University and maintain a small private practice in clinical psychiatry.

2. I received my medical degree in 1989 from the University of Witwatersrand in Johannesburg, South Africa. Between 1992 and 1996, I performed my residency in psychiatry at the Albert Einstein College of Medicine in the Bronx, New York. In 1996, I served as Chief Resident at the Bronx Psychiatric State Hospital. From 1996 through 1998, I performed a

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Re. Chana Braun

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clinical research fellowship in psychopharmacology at the Commonwealth Research Center, Massachusetts Mental Health Center affiliated with the Harvard Medical School.

3. Before embarking on my career in psychiatry, I served as an emergency room doctor and as a general physician in pediatrics and trauma.

4. I have approximately 150 peer reviewed research publications to my name including several in the field of chronic post-traumatic stress disorder (PTSD).

5. Based on my education and experience as outlined above, I have provided expert reports that were submitted as exhibits in *Biton v. The Palestinian Interim Self-Government Authority, et al.*, 01 CV 382 (RWR), *Gilmore v. The Palestinian Interim Self-Government Authority et al.*, 01-cv-00853 (GK), *Rubin v. Islamic Republic of Iran_01-1655* (RCL), *Ben Haim v. Islamic Republic of Iran*, 02-01811 (RCL) and *Kaplan v. Hezbollah, et al.*, No. 09-cv-646 (RWR) in the United States District Court for the District of Columbia, *Leibovitch v. The Syrian Arab Republic et al.*, 08 CV 01939 (WTH) in the United States District Court for the Northern District of Illinois, and in *Shatsky v. The Syrian Arab Republic et. al.*, 02-2280-RJL in the United States District Court of the District of Columbia. I testified at a deposition in, *Saperstein v. Palestinian Authority*, Case No. 0420225-CIV-Turnoff in the United States District Court for the Southern District of Florida. I have testified as an expert at one trial *Sokolow vs Palestinian Liberation Organization et al.*, 04-CV-397(GBD). In Israel, I have also submitted court mandated evaluations of psychiatric patients.

6. A copy of my curriculum vitae including a list of all publications authored by me within the preceding ten years is attached hereto.

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7. I have been asked to provide an evaluation for Chana Braun. To prepare this evaluation, I examined Plaintiff Chana Braun on 28 December 2015. Upon examining Chana Braun, I prepared a written Psychiatric Evaluation for her. That written Psychiatric Evaluation represented my professional assessment of Chana Braun. Accordingly, I incorporate by reference into this report the Psychiatric Evaluation regarding Plaintiff Chana Braun dated 28 December 2015 (attached hereto).

Psychiatric Disorders

8. To facilitate understanding and analysis of the Psychiatric Evaluation, I am including a brief explanation of Persistent Complex Bereavement Disorder, Post-traumatic Stress Disorder and Persistent Depressive Disorder which afflicts Chana Braun as indicated in her Psychiatric Evaluation.

Persistent Complex Bereavement Disorder

9. Persistent Complex Bereavement Disorder (also known as Pathological Grief or Complicated Mourning) refers to a description of the normal mourning process that leads to chronic or ongoing mourning. The term "Pathological Grief" is applied to people who are unable to get over their grief despite the passage of time. It can take most people up to several years to get past a serious loss especially when the loss is associated with a violent and unexpected death. The person may experience intrusive distressing preoccupation with the deceased and wish to be reunited with the deceased. They may feel a sense of futility about the future, difficulty acknowledging the death, excessive irritability, bitterness or anger about the unfairness of the death and most significantly impaired social/occupational functioning. A pathological grief

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reaction is usually diagnosed after a long time (one or more years) have passed and the grieving person is not improving as expected.

Post-Traumatic Stress Disorder

10. Post-Traumatic Stress Disorder (“PTSD”) is a condition which develops from having been exposed to, or witnessing, life-threatening events. In addition, the traumatic event may be indirect, by hearing of a relative or close friend who has experienced the life threatening event. Indirectly experienced death must be accidental or violent. PTSD is characterized by distinct types of symptoms. These symptoms include avoidance, re-experiencing the event, and hyper-vigilance. Avoidance is the active escape from situations that the PTSD victim associates with the event. Re-experiencing is reliving the memory of the event. Hypervigilance is a cluster of symptoms that includes exaggerated startle response, inability to fall asleep and inability to stay asleep.

11. The disorder is also characterized by negative alterations in mood or cognitions which indicates a decline in someone’s mood or thought patterns. This can include memory problems that are exclusive to the event, negative thoughts or beliefs about one’s self or the world, distorted sense of blame for one’s self or others, related to the event, being stuck in severe emotions related to the trauma (e.g. horror, shame, sadness), severely reduced interest in pre-trauma activities and feeling detached, isolated or disconnected from other people.

12. Due to their suffering and symptoms, educational and employment prospects for PTSD victims are often lowered. Some have difficulty interacting with others.

13. Younger victims and females may be more likely to be susceptible to PTSD.

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14. Overall effects on PTSD patients from this illness are severe. Patients are easily distractible due to their exaggerated response to stimuli. Individuals face considerably lowered employment prospects and increased likelihood of difficulty in forming and maintaining interpersonal relationships. For those who are married or who are able to marry and have children the stress of childrearing will be compounded. The inability to relax and have a good time is extremely common with PTSD patients.

Persistent Depressive Disorder (Dysthymic Disorder)

15. Persistent Depressive Disorder (previously known as Dysthymic Disorder) is a chronic (long-lasting), mild form of depression. However, calling it "mild" is misleading; because it can last for years and it can be just as debilitating as a more acute episode of major depression (clinical depression), even leading to thoughts of, or attempts at, suicide. Many of the symptoms of dysthymia are the same as those of major depression; however, they may be less severe or intense. Dysthymia also has some symptoms that may not occur with major depression. The hallmark of dysthymia is the length of time that it persists. In adults, dysthymia is diagnosed when the symptoms continue for two or more years; in children or teens, the symptoms last for a year or more. Dysthymia is a serious condition that needs to be treated. Dysthymia may include the experience of the following symptoms: sad mood, difficulty falling sleeping (or sleeping too much), increased or decreased appetite or weight, feelings of worthlessness, feelings of hopelessness, thoughts of suicide, anxiety, decreased motivation, loss of interest (anhedonia), irritability or anger, restlessness (especially in children) and vague physical symptoms.

Expert Declaration of Dr. Rael Strous

Re. Chana Braun

24 May 2016

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16. Chana Braun displays some form of Persistent Complex Bereavement Disorder, Post-traumatic Stress Disorder and Persistent Depressive Disorder either currently or in the past as a result of her daughter being killed in a terror attack in 2014.

17. Based on my evaluation of Chana Braun, I believe that many of her symptoms with which she has been diagnosed are likely to be present in varying degrees for a significant time to come and while it is impossible to state for any absolute certainty, many of the symptoms may even be permanent.

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

Dated: 24 May 2016



Rael Strous, MD

Rael Strous MD

Psychiatrist

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Tel: 972-544-628254

Email: rael@post.tau.ac.il

USA Board Certified Psychiatrist

Israel Medical License: 31932

Israel Psychiatry License: 17270

28 December 2015

Psychiatric Evaluation: Chana Braun

Date of Birth: [REDACTED]

This evaluation is based on clinical interview and formal psychiatric evaluation, as well as my review of the discovery materials in this case as listed in my introduction. My opinions are stated within a reasonable degree of medical certainty.

Identifying Information

Chana Braun is a 23-year-old female dual USA and Israeli citizen currently residing in Jerusalem, Israel. She was born and grew up in Monsey, New York City. She has been residing in Israel for the past 3 and a half years. She works as a secretary in a learning institution. She has been married for the past 3 and a half years and is the mother of one child currently with one deceased child. Both of her children were born while she was living in Israel.

Presenting Problem

On 22 October 2014, she recalls travelling with her husband and daughter, Chaya Zissel, to visit the *kotel* (Western Wall) in old Jerusalem. On their way back, she remembers vividly how suddenly she saw a car coming straight at her and her family.

The car was travelling on the sidewalk. She felt like she was in a Hollywood movie and that the car was therefore supposed to stop. But it didn't. She recalls a feeling of it being unreal and being at a total loss of control in the situation. Suddenly her husband was on the floor and her baby was not in her carriage. When she finally reached her baby, she noted her face was all "smashed up". She does not recall seeing any blood on her face, but does remember that her baby's face was all out of shape. She recalls being in a state of total shock and despair. Her shock was so intense that she felt again that it was all almost "unreal" and "not happening". This she feels was a kind of denial in order to protect herself from the immense pain and terror that she was experiencing. The police came and took her baby from her at which point she recalls that her baby started throwing up. She attributed this to her baby having recently eaten however she understands now that it was probably due to the baby's head injury. She once again felt intense distress at the sight. She travelled to the hospital where she was given the news that her baby had died. The shock and pain was extreme and overwhelming.

During the entire length of the *Shiva* (seven days of mourning after the funeral), she recalls being in total shock and constantly crying. She was not able to sleep and was given sleeping tablets. Even with the sleeping tablets, she remembers that she could not sleep through the night and woke up frequently. Her nightmares over the event began early and continue to this day. Her loss was profound and this led to her feeling very depressed and sad. She tried to distract herself from the pain however this was impossible due to the profound change in her life from being a mother to suddenly being a mourner. This was compounded by the constant attention initially from the media with whom she refused contact.

Long-term Physical and Psychological Repercussions Following the Event

Following the initial period of pain, devastation, intense grief and profound sense of loss, her sadness took on a deeper feeling of depression. She reports loss of communication with her friends since she felt that they could not understand what she was going through. Thus, as she saw it, there was no way that anyone could have supported her during this time. There were some friends, who used to be good friends, with whom she could not speak to for months. Her feeling of disconnection and poor

general function was compounded by what came to be her chronic inability to sleep. Her function was so compromised in the first months that she was not able to even prepare food. Thus friends and family would bring her food for weeks which turned into months. She started to work after a few months after people around her encouraged her to work in order to distract herself from the pain that she was experiencing from the loss of her only daughter. She remembers during this time that she would have flashbacks of her baby's "smashed and deformed face" after the terror event. She simply could not rid herself of some of these images.

During the initial and long term after the event, she also had great difficulty being alone. Thus when her husband had to go out and was not around to be with her, she would go to her sister or to a select few friends who would be with her until her husband returned.

Other problems that arose during this period included:

1. Poor concentration – affecting ability to work
2. Anhedonia – she simply could not enjoy anything
3. Inability to relax – for example she could not read a book due to her constant recalling of her loss whenever she had any quiet time.
4. Chronic tiredness and low energy – compounded by poor sleep and "scary dreams". To this day she feels threatened in her dreams. This was never the case before the terror event.

Problems affecting her function to this day as she reports include:

1. Refusal to use trains (the terror event took place at a train station alongside the light rail)
2. Discomfort and anxiety taking any public transport including buses. For a long time after the event she was not able to take buses. It took her months before she slowly was able to do so despite the intense unease it caused her.
3. She still gets nervous and panicky when she is on public transport and the conductor comes to check her ticket. This is since it triggers the precise memory of the conductor checking her tickets immediately prior to the terror event.

4. Despite the religious significance the *kotel* (Western Wall) has for her, to this day she is very reluctant to visit the site since that is what she did before the terror attack. Anything related, even vaguely to the event, triggers off her anxiety and tension and she resorts to feeling as if it were occurring again.
5. She remains hypersensitive to loud noises. This is not as intense and profound as it was initially, when she was immensely sensitive to loud noises. However, the hypersensitivity to noises is of an intensity that it still affects her generalized anxiety levels.
6. She remains hypervigilant in the street wherever she finds herself. In addition, she remains still very wary of cars driving in the street. This is a marked change from before the event.
7. She avoids anyone reminding her of the event. She reports that it took her days to agree to meet with me (for the psychiatric evaluation) due to the fears of the feelings that may arise during the discussion over her deceased daughter. It is for this reason that her social relationships were prominently affected as she reports since she could not bear to be in a situation where she would have to address the topic of losing her child and thus avoided social interaction.
8. She becomes particularly sad when any photographs are taken at family events since she knows that her daughter is missing. This feeling of emptiness and loss is also compounded when she sees other children who are the age that her daughter would have been today.
9. Anything that triggers a memory of her daughter causes her to become "intensely" sad, teary eyed, feeling of disconnection and leads to momentary loss of function (including ability to go out shopping, do the laundry, cooking and being with friends).

Due to her significant impairment in function over the short and long term, she began seeing a psychologist (Marci Jablinowitz) for intense psychotherapy in order to deal with her loss and her resulting chronic low mood. This began in June 2015 and continues to this day in weekly psychotherapy treatments. She is planning to begin in tandem a course of EMDR treatments which has been advised based on her prominent PTSD symptomatology. She has also been advised to follow up with group therapy with an organization that deals with families who have lost members to terror. She is waiting to begin these meetings.

Previous Psychiatric Illnesses

Ms. Braun reports no psychiatric history of any type prior to the terror event.

Alcohol or Substance History

She reports no use of any drugs or smoking.

Current Medical Illnesses

None reported

Family Psychiatric History

None reported

Mental Status

General appearance: groomed.

Behavior: Obvious anxious and nervous behavior. Required her husband to be with her initially for support when she started speaking about her loss. Was tearful on several occasions during the evaluation on describing memories of the terror attack and her relationship with her deceased daughter.

Affect: Dysthymic affect when discussing the effects the loss had on her.

Mood: Admits to still feeling chronic low mood since the event – believes she has never returned to where she was before the loss of Chaya Zissel even after the birth of her second child.

Speech: Clear and coherent

Thought disorder: No evidence of formal thought disorder.

Thought Content: No evidence of delusional content.

Perceptual Disorder: No evidence of past or present hallucinations. No evidence of psychosis.

Neurocognitive and neuropsychiatric status: fully alert and oriented. Concentration and attention ability is intact.

Impulse Control: Intact.

Insight: Good.

Judgment: Good.

Reliability of Mental status and interview: very good.

Psychological Testing

HAM-D and HAM-A rating scales, PTSD scale (PDS) and Pathological Grief screening questionnaires were administered.

The Hamilton Depression rating scale (also known as the Ham-D) is the most widely used clinician-administered depression assessment scale. The original version contains 17 items (HDRS17) relating to symptoms of depression experienced over the past week. **The Hamilton Anxiety Rating Scale (HAM-A)** is a widely used and well-validated tool for measuring the severity of a patient's anxiety. The HAM-A probes 14 parameters.

The **Post-Traumatic Stress Diagnostic Scale (PDS)** is a 49-item self-report measure used in clinical or research settings to measure severity of Post-traumatic Stress Disorder (PTSD) symptoms related to a single identified traumatic event. The PDS has four sections. Part 1 is a trauma checklist. In Part 2, those completing the scale are asked about this most disturbing traumatic event including when it happened, if anyone was injured, perceived life threat, and whether the event resulted in helplessness or terror. Part 3 evaluates 17 PTSD symptoms. Respondents are asked to rate the severity of the symptom from 0 ("not at all or only one time") to 3 ("5 or more times a week / almost always"). Part 4 assesses influence of the symptoms in their lives.

A semi-structured interview format to facilitate assessment of complicated grief, developed by Shear et al., was administered (**Interview Guide for Complicated Grief**). This is a screening rating scale with two Parts (A and B). The first section requires at least one of 4 symptoms to be endorsed indicating experience over the past month. The second section requires at least two of 8 symptoms to be endorsed. In addition, the **Brief Grief Questionnaire** developed by Shear and Essock was administered consisting of 5 screening questions (0-2) for Complicated Grief disorder.

Scores indicate presence of moderate depression (score of 16 on the Ham-D), mild anxiety (score of 16 on the Ham-A), moderate to severe PTSD (score of 24 on the

PDS) and presence of pathological/complicated grief (2 of 4 on Part A, 6 of 8 on Part B; Score of 8 on Brief Grief Questionnaire). Please see attached documents with detailed scoring.

Report of Psychologist Dr Norman Blumenthal

Spoke with Mrs. Braun on several occasions after the traumatic event:

10 November 2014 – describes Chana as overtly grieving and feeling that everyone is staring at her. He encouraged her to allow her pain to reach full expression and legitimacy.

14 November 2014 – described Mrs Braun as being increasingly pained and despondent. Discussed with her value of seeking therapy locally.

10 December 2014 – indicated Chana's difficulties in resuming normal work routine. Documented Chana's debilitating grief and pining for her daughter.

28 January 2015 – described Chana being destabilized by inconsistencies in her responses. Some days include "sheer terror and marked difficulties containing emotions." "Afraid that her emotions would get the better of her".

29 January 2015 – doing better, yet worried that she will be overprotective and suffocating with subsequent children."

In a further document, Dr Blumenthal noted that "While evidencing debilitating post trauma reactions as well, Mrs. Braun's functioning has been more compromised by her grief and depressive symptoms meeting the criteria of a Dysthymic Disorder (ICD 9 Code 300.40) including depressed mood, sleeplessness, brooding, chronic fatigue, isolation and the like. Along with our periodic contact, Mrs. Braun has sought out therapeutic assistance in Jerusalem as well."

Comments of Psychotherapist: Marci Jablinowitz MS

Note dated 29 March 2016:

Indicated that she has been meeting with Ms. Braun for one hour weekly therapy sessions since May 2015 after she was referred to her as a result of the tragic death of her three month old baby Chaya Zissel, in a terrorist attack in the Ramat Eshkol neighborhood in Jerusalem the previous October. She reported that Ms. Braun has been struggling with depression and PTSD as a result of the terror attack and has been processing the traumatic loss of her daughter, the ensuing grief, and the havoc it caused to her young marriage. While her pregnancy had been a significant source of

comfort, it has also been complex and stressful as Ms. Braun "navigates her way through loss and grief".

Summary of Observations

Chana Braun is a 23-year-old female with signs and symptoms of PTSD and pathological/complicated grief since her 3-month old daughter died following a fatal injury after a car indiscriminately ran her over. Her husband was also injured in the event. The loss of her daughter in such a sudden and violent manner led to a marked change in her mood and behavior with her experiencing significant depression over the months in addition to social and role dysfunctional behavior.

Prognosis

Chana Braun suffered overwhelming pain and devastation following the loss of her daughter in a motor vehicle accident in 2014. Chaya Zissel was her first child and one for whom she reported she waited a long time. She clearly expresses how her life has been hugely affected in light of her loss. It is not expected that her deep feelings of grief affecting many areas of her personal and interpersonal functioning will resolve in the short term, and they will continue to affect her indefinitely.

Diagnostic Formulation

309.89 (F43.8) Persistent Complex Bereavement Disorder; (severe) with traumatic bereavement

309.81 (F43.10) Post-traumatic Stress Disorder

300.4 (F34.1) Persistent Depressive Disorder; moderate severity, late onset, with pure dysthymic syndrome



Rael Strous MD

Attachments: HAM-D rating scale results

HAM-A rating scale results

PDS scale

Pathological Grief Screening (Interview Guide for Complicated Grief, Brief Grief Questionnaire)

Curriculum Vitae (Rael Strous MD)

Curriculum Vitae: Rael D. Strous MD

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Current Title and Affiliation:

Director Chronic Inpatient Unit, Beer Yaakov Mental Health Center

Associate Professor, Department of Psychiatry, Sackler Faculty of Medicine, Tel Aviv University

EDUCATION

- 1984 – 1989 Medical School, *University of Witwatersrand*, Johannesburg, South Africa, MBBCh
 1992 – 1996 Psychiatry residency, *Albert Einstein College of Medicine*, New York (USA Board Certification)
 1996 – 1998 Clinical Research Fellowship in Psychopharmacology, Massachusetts Mental Health Center, *Harvard Medical School*, Boston, USA

ADDITIONAL STUDIES

- 1987-1989 Psychology, Theological Bioethics, University of South Africa, Pretoria, South Africa
 1996 Neuroimaging Mini-Fellowship, Columbia University, NY, USA
 1995 Board Certification Forensic Examination, American College of Forensic Examiners

PROFESSIONAL EXPERIENCE

- 1990 Internship, Hillbrow Hospital, Medicine, Surgery, Johannesburg, South Africa
 1991 Alexandra Health Center, Ambulatory Med., General physician, Johannesburg, South Africa
 1991 Johannesburg General Hospital, Emergency Room MD
 1992-1996 Psychiatry Resident, **Albert Einstein College of Medicine**, Bronx Municipal Hospital, North Central Bronx Hospital, Montefiore Hospital (Chief Resident Bronx Psychiatric State 1995/6)
 1996-1998 Research Fellow, Commonwealth Research Center, Massachusetts Mental Health Center, **Harvard Medical School**
 1999–present Beer Yaakov Mental Health Center, Director Chronic Inpatient Unit (from 2003)
 2001-present Sackler Faculty of Medicine, Tel Aviv University Lecturer and Tutor
 Medical Students in Psychiatry
 2002-2006 Member Physician Committee, Beer Yaakov Mental Health Center Psychiatry
 2002-present Chairman Medication Committee, Beer Yaakov Mental Health Center
 2003-2006 Israel Society of Biological Psychiatry, Executive Board Member
 2003-2006 Israel Society of Biological Psychiatry Annual Conference Committee Member
 2004-present World Psychiatry Association (WPA) Section on Religion Committee Member
 2005-2006 World Psychiatry Association (WPA) Section, Committee Member
 on Law and Psychiatry
 2006, 2009, 2011 Israel Psychiatry Association Annual Congress, Scientific Organization Committee Member
 2005-2010 Member Clinical Teaching Committee, Sackler Faculty of Medicine, Tel Aviv University

ACADEMIC AND RESEARCH ACTIVITIES, SACKLER FACULTY OF MEDICINE

2009-2010: Director, New York State/American Program, Sackler Faculty of Medicine, Tel Aviv University
 2008-2010 Member Medical School Curriculum Committee
 2008-2010 Member Four Year Medical School Program Steering Committee
 2003-present: Member Medical School Admissions Evaluation Team
 2003-2008: Coordinator medical student exam in psychiatry (USA and Israeli medical students)
 2003-2006: Executive Board Member, Israel Society of Biological Psychiatry
 2005-present Member Editorial Board: Law and Medicine Journal
 2005-2010: Member Clinical Teaching Committee, Sackler Faculty of Medicine
 2006-present: Deputy Editor, Israel Journal of Psychiatry
 2008-2010: Member Planning Committee for four-year medical degree, Sackler Faculty of Medicine

ACADEMIC AND PROFESSIONAL AWARDS

1988 Alice Cox Award, Best medical student in psychiatry, University Witwatersrand Medical School
 1992-5 Top psychiatric resident in annual national PRITE examination, Department of Psychiatry
 Albert Einstein College of Medicine (top 1% of all USA psychiatry residents)
 1994/95 Burroughs Wellcome Leadership Award, American Medical Association (AMA)
 1994/95 Mead Johnson Fellowship Award, American Psychiatric Association (APA)
 1995 Young Investigator Award International Congress on Schizophrenia Research, USA
 1995 Lilly Resident Research Award, American Psychiatric Association (APA)
 1995/96 Young Scientist Award, 8th Biennial Winter Workshop on Schizophrenia (Switzerland)
 1996 Young Investigator Award, Society of Biological Psychiatry
 1996/7 Young Researcher Award, American Neuropsychiatric Association
 1996 Dupont-Warren Fellowship Award, Department of Psychiatry, *Harvard Medical School*
 1996 New Investigator Award (NCDEU)/National Institute Mental Health, USA (NIMH)
 2000 Rafaelsen Fellowship Award, Collegium Internationale Neuropsychopharmacologicum (CINP)
 2001 Fellowship Award, World Congress of Biological Psychiatry
 2002 Fellowship Award, European College of Neuropsychopharmacology (ECNP)
 2002 Team Award for Best Research Paper, Israel Psychiatry Association
 2002 Clinical Research Award: Best Clinical Research Paper, Israel Society of Biological Psychiatry
 2004 Outstanding Young Investigator Award, International Congress of Biological Psychiatry
 2004 Donald Cohen Fellowship Award, International Association of Child Psychiatry and Allied
 Professions (IACAPAP)
 2004 **Outstanding Teacher/Lecturer of the Year**, Sackler Faculty of Medicine, Tel Aviv University
 2006 Certificate of Honor (research presentation), Israel Society for Biological Psychiatry
 2007 **Outstanding Teacher/Lecturer of the Year**, Sackler Faculty of Medicine, Tel Aviv University
 2010 **Immigrant Scientist Recognition Award** from Israel Ministry of Immigration
 2010 **Outstanding Employee of Year**, Beer Yaakov Mental Health Center

GRANTS AWARDED

2000 Ministry Of Science: Chief Scientist Award, PRINCIPAL INVESTIGATOR, Clinical study of first-episode psychosis
 2000 Israel Institute of Psychobiology Grant, PRINCIPAL INVESTIGATOR, Functional MRI investigation in first-episode schizophrenia
 2000 Guggenheim Foundation Grant, PRINCIPAL INVESTIGATOR, Genetic polymorphisms in violence and aggression
 2000 Israel Ministry Of Defense Research Grant, PRINCIPAL INVESTIGATOR, Novel pharmacological management of treatment resistant PTSD

- 2000 NARSAD Young Investigator Award, PRINCIPAL INVESTIGATOR, Novel augmentation strategies with neurosteroids in schizophrenia
- 2002 Stanley Foundation Grant, CO- PRINCIPAL INVESTIGATOR, Neurosteroids in schizophrenia
- 2002 India-Israel Research Project, CO-INVESTIGATOR, Genetics of Schizophrenia
- 2002 Dreyfuss Health Foundation, PRINCIPAL INVESTIGATOR, Treatment resistant schizophrenia
- 2003 Stanley Foundation Grant, PRINCIPAL INVESTIGATOR, Methyl donors in schizophrenia
- 2003 NARSAD Young Investigator Award, PRINCIPAL INVESTIGATOR, Neurosteroids and management of treatment resistance and medication related side-effects in schizophrenia
- 2007 Mordechai Ofer Research Award Grant, Tel Aviv University, PRINCIPAL INVESTIGATOR, Psychiatry during the Nazi era, its relevance today and ethical ramifications for current practice

MEMBERSHIP IN PROFESSIONAL SOCIETIES

- 2003-present World Society of Biological Psychiatry
- 2003 International Group Therapy Association
- 2001-present European College of Neuropsychopharmacology (ECNP)
- 1999-present Israel Medical Society
- 1999-present Israel Psychiatric Association
- 1999-present Israel Society for Biological Psychiatry
- 1996 American College of Forensic Examiners
- 1996-8 Massachusetts Society of Medicine, USA
- 1994-8, 2006 International Society of Political Psychology
- 1992-1998 American Psychiatric Association
- 1990 South African Medical & Dental Council
- 1990 General Medical Council (Great Britain)

ACTIVE PARTICIPATION IN SCIENTIFIC MEETINGS (Poster or Lecture presentation)

- 1992 American Psychiatric Association, USA
- 1993 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Conference of Political Psychology, Boston, USA
Institute of Psychiatric Services, San Diego, USA
- 1994 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Congress on Schizophrenia Research, Colorado, USA
Institute of Psychiatric Services, Boston, USA
- 1995 American Psychiatric Association, USA
American Medical Association, USA
Biological Psychiatry, USA
International Congress on Schizophrenia Research, Switzerland
New Clinical Drug Evaluation Unit (NCDEU), Boca Raton, USA
American Neuropsychiatric Association, Orlando, USA
- 1996 American Psychiatric Association, USA
- 1997 Society of Biological Psychiatry, Kfar Giladi, Israel
- 1998 Israel Society of Neuroscience, Eilat, Israel
IBRO, International Brain Research Organization, Jerusalem, Israel
- 1999 CINP, Brussels, Belgium

- Israel Psychiatry Association, Jerusalem, Israel
 Israel Society of Neuroscience, Eilat, Israel
- 2001 American Psychiatric Association, New Orleans, USA
 World Congress Biological Psychiatry, Berlin, Germany
- 2002 Association of European Psychiatrists, Stockholm, Sweden
 ECNP, Barcelona Spain
 Pharmacogenetics, Mayo Clinic, Minnesota, USA
- 2003 European Conference on Violence in Clinical Psychiatry, London, England
 ACNP, Puerto Rico, USA
- 2004 International Congress of Biological Psychiatry
 Society of Biological Psychiatry, Hagoshrim, Israel
 International Congress of Neuropsychiatry, Athens, Greece
- 2005 Society of Biological Psychiatry, Hagoshrim, Israel
 International Conference on Medical Ethics, Haifa
 American Psychiatric Association, Atlanta, USA
 World Congress Biological Psychiatry, Vienna, Germany
- 2006 Nefesh Israel, Jerusalem (**Lecturer**)
 Society of Biological Psychiatry, Hagoshrim, Israel (**Lecturer**)
 Israel Psychiatry Association, Tel Aviv (**Lecturer**)
 International Society of Political Psychology, Barcelona, Spain (**Lecturer**)
 World Association Medical Law, Toulouse, France (**Lecturer**)
 ECNP (European College Neuropsychopharmacology) Paris, France
- 2007 Society of Biological Psychiatry, Hagoshrim, Israel (**Lecturer**)
 World Psychiatry Association: Coercive Treatment in Psychiatry, Dresden, Germany
(Lecturer)
- 2008 Society of Biological Psychiatry, Israel
- 2009 Nahariah Conference on Holocaust (**Lecturer**)
 Israel Medical Association Conference (**Lecturer**)
 Brother-Other: Israel/Poland Mental Health Association, Krakow, Poland (**Lecturer**)
- 2010 CINP, Hong Kong (**Lecturer**)
 Society for International Research of Schizophrenia (SIRS), Florence, Italy (**Lecturer**)
 International Conference on 'Integrating Traditional Healing Practices into Counseling
 Psychology, Psychotherapy and Psychiatry.' Durban, South Africa, (**Lecturer**)
- 2011 International Conference, Medical Ethics, Bochum, Germany (**Lecturer**)
 International Conference for Clinical Ethics and Consultation, Amsterdam, Holland
(Lecturer)
 ECNP, Paris, France (**Lecturer**)

REVIEWER FOR FOLLOWING JOURNALS:

Archives of General Psychiatry, American Journal of Psychiatry, British Journal of Psychiatry,
 Neuropharmacology, Journal of Medical Ethics, European Journal of Neuropsychopharmacology,
 Journal of Nervous and Mental Disorders, Psychiatry Research, Schizophrenia Research, Biological
 Psychiatry, Schizophrenia Bulletin, Israel Journal of Psychiatry, Israel Medical Association Journal

PUBLICATIONS (150 in Total)**Original Research Articles**

1. **Strous, RD.**, Cowan, N., Ritter, W., Javitt, D.C.
Auditory sensory (“echoic”) memory dysfunction in schizophrenia.
American Journal of Psychiatry;152:10, 1517-1519, 1995.
2. Javitt, D.C , **Strous, RD.**, Grochowski, S., Ritter, W, Cowan, N.
Impaired precision, but normal retention, of auditory sensory memory information in schizophrenia.
Journal of Abnormal Psychology;106:315-324, 1997.
3. **Strous RD.**, Bark N, Parsia S, Volavka J, Lachman H. M.
Analysis of a functional Catechol-O-Methyltransferase gene polymorphism in schizophrenia:
Evidence for association with aggressive and antisocial behavior.
Psychiatry Research;69:71-77, 1997.
4. **Strous RD.**, Bark N, Woerner M, Lachman HM.
Lack of an association of a functional Catechol-O-Methyltransferase gene polymorphism in
schizophrenia.
Biological Psychiatry;41:493-495, 1997.
5. Green AI, Zimmet S, **Strous RD.**, Schildkraut JJ.
Substance use disorder and schizophrenia: Do patients with schizophrenia have a reward deficiency
syndrome that can be ameliorated by clozapine.
Harvard Review of Psychiatry;6:289-296, 1999.
6. Zimmet SV, **Strous RD.**, Burgess ES, Kohnstamm S, Green AI.
Effects of clozapine on substance use in patients with schizophrenia and schizoaffective
disorder: a retrospective survey.
Journal of Clinical Psychopharmacology;20:94-8, 2000.
7. **Strous RD.** Shtain M, Oselka-Goren H, Lustig M, Stryjer R, Zerzion M, Baruch Y, Chelben J.
Anticipatory Reactions of Psychiatric Inpatients to the Year 2000.
Journal of Nervous and Mental Disease 2000;188:786-788.
8. Ilani T, Ben-Shachar D, **Strous RD.**, Mazor M, Sheinkman A, Kotler M, Fuchs S.
A novel peripheral marker for schizophrenia: Increased levels of D3 dopamine
receptor mRNA in blood lymphocytes.
Proceedings of the National Academy of Sciences (PNAS), USA 2001, 98:625-8.
9. **Strous RD.** Spivak B, Yoran-Hegesh R, Maayan R, Averbuch E, Kotler M, Mestor R,
Weizman A.
Analysis of neurosteroid levels in attention deficit hyperactivity disorder.
International Journal of Neuropsychopharmacology 2001 ;4:259-64
10. **Strous RD.** Pollack S, Robinson D, Sheitman B, Lieberman JA. Seasonal
Admission Patterns in First Episode Psychosis, Chronic Schizophrenia and Non-
Schizophrenic Psychoses
Journal of Nervous and Mental Diseases 2001;189:642-4.

11. Szeszko PR, **Strous RD**, Goldman RS, Ashtari M, Knuth KH, Lieberman JA, Bilder RM. Neuropsychological correlates of hippocampus volumes in first-episode schizophrenia. American Journal of Psychiatry 2002;159:217-26.
12. Segman RH, Heresco-Levy U, Yakir A, Goltser T, **Strous RD**, Greenberg D, Lerer B. Interactive effect of cytochrome P450 17 α -hydroxylase and dopamine D3 receptor gene polymorphisms on abnormal involuntary movements in chronic schizophrenia Biological Psychiatry. 2002;;51:261-3.
13. Green AI, Burgess ES, Zimmet SV, Dawson R, **Strous RD** Alcohol and Cannabis use in schizophrenia: Effects of risperidone vs. clozapine. Schizophrenia Research 2003;60:81-5.
14. Stryjer R, **Strous RD**, Bar F, Werber E, Shaked G, Buhiri Y, Kotler M, Weizman A, Rabey JM Beneficial effect of donepezil augmentation in the management of comorbid schizophrenia and dementia Clinical Neuropharmacology 2003;26:12-7
15. **Strous RD**, Maayan R, Lapidus R, Stryjer R, Lustig M, Kotler M, Weizman A Value of Dehydroepiandrosterone (DHEA) Augmentation in the Management of Negative Symptoms in Schizophrenia Archives of General Psychiatry 2003;60:133-141
16. Stryjer R, **Strous RD**, Shaked G, Bar F, Feldman B, Kotler M, Polak L, Rosenzweig S, Weizman A Amantadine as augmentation therapy in the management of treatment resistant depression. International Clinical Psychopharmacology 2003;18:93-6.
17. **Strous RD**, Stryjer R, Keret N, Bergin M, Kotler M Reactions of Psychiatric and Medical Inpatients to Terror and Security Instability in Israel Journal of Nervous and Mental Disorders 2003;191:126-129.
18. Shifman S, Bronstein M, Sternfeld M, Shalom A, Lev-Lehman E, Grisaru N, Karp L, Kotler M, Knobler HY, Reznik I, Schiffer R, Shinar E, Spivak B, **Strous RD**, Swartz-Vanetik M, Weizman A, Yakir B, Risch N, Zak NB, Darvasi A. A highly significant association between a COMT haplotypes and schizophrenia. American Journal of Human Genetics 2002 6:1296-302
19. Stryjer R, **Strous RD**, Bar F, Poyurovsky M, Weizman A, Kotler M Treatment of neuroleptic induced akathisia with the 5HT_{2a} antagonist trazodone. Clinical Neuropharmacology 2003;26:137-41.
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147. **Strous RD,** Kotler M
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 Israel Medical Encyclopedia
148. **Strous RD,** Kotler M
 Psychopharmacology Management
 Israel Medical Encyclopedia
149. **Strous RD**
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British Journal of Psychiatry. .2007; 190:81a (eletter)

150. **Strous RD**, Kotler M.
The challenge of military adversity and the need for protective mechanisms.
Israel Medical Association Journal 2008;10:892-3.

EXHIBIT 10

Alan Friedman, M.D.

Board Certified in Physical Medicine & Rehabilitation

Name: **Braun, Samuel (Shmuel).**

DOB: REDACTED

Date of Injury: 10/22/14.

Date of Exam: January 12, 2016.

The examination was performed in his apartment in Jerusalem, Israel.

RECORDS REVIEWED

- MRI right knee, (05/11/14): “There is a partial tear of the MCL with bone contusion in the area of the origin of the MFC [medial femoral condyle]. There is an osteochondral injury of the LFC [lateral femoral condyle] posteriorly and a bone contusion in LTP [lateral tibial plateau] anteriorly and posteriorly and at the head of the fibula.”
- Prescription for physical therapy.
- List of medical appointments from the Meuchedet Health Clinic showing visits on 02/10/14, 02/11/14, 03/11/14, 05/11/14, 06/11/14, 15/11/14, 22/11/14, 02/12/14, 29/05/15, 08/06/15, 24/08/15, 26/08/15, 27/08/15, and 16/10/15. He was diagnosed with acute bronchitis on October 16, 2015, and had pharyngitis on 11/03/14.
- Clinic evaluation on November 2, 2014 with Dr. Joyce Morel. This is his second visit with Dr. Morel who wrote that the patient "was hit by terrorist's car in piguah at Giv'at Hatachmoshet Rail station. Fractured a rib right side, abrasions and contusions to right knee and lower leg. Now complaining of continued pain to knee, mostly medial aspect. Able to walk, but painful.” The examination included “the right knee has obvious effusion, edema and ++ tenderness at medial joint line. Unable to fully extend knee”. She referred him to an orthopedic surgeon for further evaluation.
- List of physical therapy sessions from November 6, 2014 until January 25, 2015.

HISTORY

Mr. Braun is a now 26 year old male who was 25 at the time of his injury.

On October 22, 2014, he had just alighted from the light rail train system in Jerusalem, Israel and was standing on the platform. A car rammed into the platform and struck him and his 11^{6/7} weeks old baby (who was in her stroller) Mr. Braun does not recall the immediate events following his injury. He recalls getting up and feeling stunned. He heard his wife yell “the baby, the baby.” He did not know what happened, but then saw his baby lying prone on the ground.

Re: Braun, Samuel

Page 2

(The baby later died of her wounds).

He was taken by EMS to Hadassah Hospital, Mount Scopus campus. He remembers being in "tremendous pain", and taken to the emergency room. He had chest pain and knee pain. X-rays revealed right rib fractures and an unremarkable knee. He was discharged home.

During the next week, while sitting in a low chair during *shiva* for his daughter, he was in significant pain – both in his right knee and his chest. His doctors informed him that the chest pain was secondary to the rib fractures and that he should breathe deeply to avoid pneumonia. He was prescribed a muscle relaxant and analgesics.

Approximately two weeks following the injury, he was referred to an orthopedist because of his knee pain. He had an MRI, which revealed a "torn ligament." He then started physical therapy and went twice a week for approximately three months was also performing a regular home exercise program. He then "burned out" from the physical therapy but did continue to do his home stretches. He states that it took approximately six months to be able to walk "relatively" normally. At that point, he stopped performing the home exercise program.

He states that the ribs healed on their own after approximately three weeks of significant pain and requiring pain medication. He currently denies any shortness of breath or cough. He did not have any followup x-ray to confirm proper rib healing.

SYMPTOMS AT THIS TIME

He has tingling in the medial right knee but no numbness. He still has pain mostly in the medial knee. Prolonged walking exacerbates the pain and he is afraid to jump or run. Change in weather also increases the pain. If he flexes the knee while he is standing, he gets some relief. Performing squats also provides some relief. He denies any falling, swelling, locking or buckling of the knee. He does not actually recall what happened to the knee. He denies any neck or low back pain.

MEDICATIONS

None at present.

ALLERGIES

Hayfever.

PAST MEDICAL/SURGICAL HISTORY

Chickenpox, and "neck spasms" five years ago. He required 50 stitches to the right knee approximately 10 years ago without any residual knee symptoms or difficulties.

Re: Braun, Samuel

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SOCIAL HISTORY

He lives with his wife and 5-1/2-month-old baby girl. He lives in a second floor walkup apartment.

FUNCTIONAL HISTORY

He is independent with activities of daily living and ambulation.

FAMILY HISTORY

No neurologic or orthopedic disease.

REVIEW OF SYSTEMS

He denies the presence of any chest pain, shortness of breath, nausea, dysuria, fevers, tremors, flushing, bruising, rashes, blurry vision, or tinnitus.

PHYSICAL EXAMINATION

Physical Examination reveals a young male, well developed, in no acute distress. He is able to ascend and descend the exam table as well as don & doff his shoes and socks independently. Inspection reveals no erythema, muscle atrophy, rashes or trophic changes. There is no edema bilaterally.

Gait: Gait is heel-to-toe with good balance. He is able to walk on his heels and toes, squat easily, and stand 1-legged on either leg.

Neuromuscular: Strength is 5/5 bilaterally in the upper and lower extremities. There is mild decreased pinprick sensation in the right lower limb – from the distal thigh to the right ankle, both medially and laterally. Reflexes are 2+/4 in the lower limbs and 2/4 in the upper limbs. Toes are flexor. Straight leg raise is negative bilaterally.

Joints: Joints are without erythema, effusions, warmth, dislocations, subluxations, or deformities. There is no tenderness over the ribs or thorax.

Evaluation of the knees reveals no effusions, redness, or warmth. There is no joint-line tenderness. McMurray's test and Lachmann's maneuver are negative bilaterally. There is laxity of the right MCL ligament. There is tenderness to palpation over the joint in general.

Neurologic: He is alert and oriented to person, place, & time. His balance is good. There are no fasciculations. Tone is normal. Fine and gross motor coordination are normal. He can pick-up a pin from the table with either hand. Cranial nerves are normal. Speech is normal. Cerebellar testing is normal. There is no clonus. Romberg's test is negative. Proprioception is normal. Pronator drift is negative bilaterally.

DIAGNOSES

1. Right medial collateral ligament tear.
2. Right knee sprain.

Re: Braun, Samuel

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3. Right knee contusion.
4. Right rib fractures.

SUMMARY

Mr. Braun suffered from significant pain for a number of months following his injuries. The rib fractures caused chest pain and discomfort. The knee continues to be symptomatic despite a normal gait pattern.

He required pain medication for a period of time due to these injuries.

The right knee has suffered a ligament tear. There remains evidence of an unhealed tear on the examination performed on January 12, 2016. Given that he has undergone a long course of physical therapy performed with an appropriate home exercise program, this condition is felt to be permanent.

If the history obtained is accurate and true, it is my opinion based on a reasonable degree of medical certainty that his symptoms are causally related to his injury which occurred on October 22, 2014.

I declare under penalty of perjury under the laws of the United States and Israel that the foregoing is true and correct.



Alan Friedman, M.D.

Diplomate of the American Board of Physical Medicine & Rehabilitation

Alan Friedman, M.D., FAAPMR

Bet Shemesh
Israel
(050) 787-4628
Fax: (077) 933-2036
E-mail: friedmal@012.net.il

PERSONAL

Born: Pretoria, South Africa
Aliyah: 2000

EDUCATION

Residency 7/96-6/99	Physical Medicine and Rehabilitation UMDNJ / New Jersey Medical School Newark, New Jersey The Kessler Institute for Rehabilitation Chairman: Joel DeLisa, MD, MS Board-certified, 2000
7/93-6/96	Internal Medicine North Shore University Hospital Cornell Medical School Manhasset, New York Chairman: Lawrence Scherr, MD Board-certified, 1996
Medical Degree 8/89-6/93	The Albert Einstein College of Medicine Bronx, New York Degree: Doctor of Medicine
Graduate 8/88-6/89	Talmudic University Miami, Florida Degree: Rabbinical Ordination
Undergraduate 9/84-6/88	Yeshiva University New York, New York Degree: BA, Pre-Health Sciences, History

BOARD CERTIFICATION

6/00	American Board of Physical Medicine and Rehabilitation
8/96	American Board of Internal Medicine
3/94	National Board of Medical Examiners

MEDICAL LICENSURE

Israel, Specialist License #18841

Alan Friedman, MD

New Jersey, USA License
New York, USA License

EMPLOYMENT

7/09 – present	Department Head, Rehabilitation Medicine, Laniado Hospital, Tzanz Medical Center, Netanya, Israel. Establishing new rehabilitation medicine department, electrodiagnostic testing, consultations, and musculoskeletal clinics.
1/05-12/10	Medical Consultant, Appeals Court for Disability Claims, District Court, Jerusalem, Israel.
5/01-1/09	Staff Psychiatrist, Hadassah University Hospital Mt. Scopus Campus. Electrodiagnostic testing and muscle disease evaluations.
3/00-present	Self-employed Psychiatrist, NY & NJ, USA. Office evaluations of musculoskeletal conditions, including diagnostic and therapeutic procedures. Hospital and sub-acute rehabilitation facility consultations and inpatient care.
7/99-3/00	The Physical Medicine and Rehabilitation Center, P.A. Englewood, New Jersey Associate in large Psychiatry practice. Office evaluations of musculoskeletal conditions. Responsible for consultations and inpatient care in hospitals and sub-acute rehabilitation facilities.
6/98-6/99	Staff Physician, Ambulatory Care – Emergency Room Veteran’s Affairs Health Care System East Orange, New Jersey

EXPERT COURT TESTIMONY

- *Wultz v. Islamic Republic of Iran* , Civil Action 08-cv-1460 (RCL) (United States District Court for the District of Columbia, February 29, 2012).
- *Sapirstein v. Palestinian Authority*, Case No. 0420225-CIV-Turnoff) (United States District Court for the Southern District of Florida).
- *Knox v. The Palestine Liberation Organization*, Civil Action No. 03-CV-4466(VM)(THK), (expert report submitted)(Southern District of New York).
- *Ben Haim v. Islamic Republic of Iran*, C.A. No. 00 CV 02602 (RCL) (expert report submitted) (United States District Court for the District of Columbia).
- *Stern v. Islamic Republic of Iran*, Case No. 1:00 CV 2602 (RCL) (expert report submitted) (Federal District Court, Washington DC)
- *Rubin, et.al v. The Republic of Iran*, (Federal District Court, Washington DC, January 8, 2003)

Alan Friedman, MD

- *Estate of Unger v. Palestinian Authority, et. al.*, CA No. 00-105L (Federal District Court, Providence, R.I. July 12, 2002).

OFFICES AND ACTIVITIES

- 1998-2006 AAPM&R Membership Marketing Committee
- 1998-99 AAP Resident Council Historical Committee-Ad Hoc, Chairman
- 10/98 Course Director, Electromyography for Residents, Kessler Institute for Rehabilitation
- 1997-98 AAPM&R Resident Physician Council Membership Marketing Committee Chairman
- 1996-99 Contributing Editor *Rehab In Review*
- 1995-96 Representative to North Shore University Hospital Ethics Committee

HONORS AND AWARDS

- 6/99, 12/03 Physician's Recognition Award, American Medical Association
- 11/98 Rhone-Poulenc Rorer Physical Medicine and Rehabilitation Resident's Scholarship Program

CHAPTERS

- The Hip: Anatomy, Pathology, Diagnosis, Treatment, & Rehabilitation. PM&R Secrets, vol. 3. Mosby Elsevier Press, Philadelphia, PA., 2008.

RESEARCH AND PUBLICATIONS

Friedman A, Diamond M, Johnston MV, Daffner C. Effects of Botulinum Toxin A on Upper Limb Spasticity in Children with Cerebral Palsy. *Am J Phys Med Rehabil* 2000; 79:53-59.

Friedman A. Resident's Attitudes Towards Membership in Professional Organizations. (Abstract). Association of Academic Physiatrists 1999 Annual Meeting.

Diamond M, Friedman A, Daffner C, Johnston MV. Effects of Botulinum Toxin A on Upper Extremity Spasticity in Children with Cerebral Palsy (Abstract). *Arch of Phys Med Rehab* 1998; 79(9):1147.

Friedman A, Green S. Aortic Dissection Presenting as Superior Vena Cava Syndrome: A Case Report. George Jaffin Essay Contest Winner, North Shore University Hospital, June 1996.

Friedman A, Rosner F. The Allocation of Scarce Medical Resources and Jewish Life; *L'Eyla Journal*, 39:10-15, April 1995.

Goldberg G, Friedman A, *et al.* Lymph Node Sampling in Patients with Epithelial Ovarian Carcinoma; *Gyn Oncol*, 47:143-145, Nov. 1992
Presented at Society of Gynecologic Oncology Conference, March 1992.

Alan Friedman, MD

Friedman A. Polymer Development. Honors Research Society, Yeshiva University; *Abstracts 1987*; 1:13.

PRESENTATIONS

- Survey of Residents' Attitudes towards Membership in Professional Organizations. Poster Presentation, AAP 35th Annual Meeting, Orlando, FL, 2/99
- Effects of Botulinum Toxin A on Upper Extremity Spasticity in Children with Cerebral Palsy. Platform Presentation, AAPM&R 60th Annual Assembly, Seattle, WA, 11/98
- Rehabilitation of the Patient with Rheumatoid Arthritis. Grand Rounds, Department of Physical Medicine and Rehabilitation, UMDNJ, June 5, 1998

PROFESSIONAL MEMBERSHIPS

American Academy of Physical Medicine and Rehabilitation
American College of Sports Medicine
American Academy of Pain Management
Israeli Society of Rehabilitation & Physical Medicine
Israeli Society of Musculoskeletal Medicine

REFERENCES

Provided upon request.

EXHIBIT 9

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

<hr/>)	
SHMUEL ELIMELECH BRAUN, et. al.)	
)	
Plaintiff,)	Civ. No. 1:15-cv-01136-BAH
)	
v.)	
)	
THE ISLAMIC REPUBLIC OF IRAN, et al.,)	
)	
Defendants.)	
<hr/>)	

DECLARATION OF SHIMSHON HALPERIN

Shimshon Halperin declares pursuant to 28 U.S.C. §1746, as follows:

1. I am an American citizen and currently reside in New York.
2. I am the father of Chana Braun and father-in-law of Shmuel Braun, who currently reside in Jerusalem.
3. In October 2014, I was visiting Israel to celebrate the holidays of Yom Kippur and Succot with my daughter and her husband.
4. Our daughter, Chana, and her husband have lived in Israel since they were married. Although we lived far apart, we remained very close, and spoke on the telephone every day. Chana and her husband spent more than a year trying to conceive a child. As part of these efforts, Chana underwent numerous surgeries. They were finally successful, and she gave birth to a baby girl, Chaya Zissel Braun.
5. I came to Israel when Chaya Zissel was born. We came again for the holidays and stayed for about three weeks. My wife flew back home before I did because I stayed to attend my cousin's wedding in Jerusalem and for my mother's *yahrzeit* (anniversary of her death).

6. The attack took place the day of the wedding. Chana and her husband had taken Chaya out in her stroller, and were getting off the train when a terrorist drove a car through the crowd of people at the train station. He hit the stroller and launched baby Chaya ten meters into the air. She landed on her head, and was not breathing when rescue personnel arrived. They were able to resuscitate her and take her to the hospital. Chana's husband also sustained serious injuries as a result of the attack.

7. While at the wedding, my cousin burst into tears and told everyone her brother had died. This was a difficult moment made worse by the call I was about to receive. While we were grieving, I received a call from Chana about the terrorist attack. I left immediately for the hospital. It was a horrific twist on what should have been a joyous occasion.

8. I was very scared and worried that Chaya might die. When I arrived at the hospital protestors outside the hospital confronted me. They were throwing rocks and cursing the hospital. Chaya was still alive when I arrived at the hospital, and Chana was already there and in tears.

9. About an hour later, Chaya was declared dead. Chana became hysterical, and started screaming and crying uncontrollably. Throughout all of this I was unable to speak with my wife, who was on a plane back to America. We were not able to communicate until she had landed.

10. The press was waiting outside when I left the hospital. They asked me numerous questions, and I was ultimately interviewed.

11. I spoke with my children in America, and asked them to tell my wife what had happened as soon as she landed. She did not leave the airport and got on the next flight back to Israel, but she did not get back in time to attend her granddaughter's funeral.

12. It became much more difficult to communicate with Chana after the terror attack. She stopped answering my calls. To this day she will periodically burst into tears for no apparent reason.

13. My wife has also changed. She does not smile as she used to, and has become a serious person – with a sense of heaviness and burden.

14. I also feel a sense of heaviness all the time and smile much less, even until today.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 22, 2016

A handwritten signature in black ink, appearing to read "S. Halperin", with a long horizontal flourish extending to the right.

Shimshon Halperin

EXHIBIT 8

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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SHMUEL ELIMELECH BRAUN, et. al.)		
)		
Plaintiff,)	Civ. No. 1:15-cv-01136-BAH	
)		
v.)		
)		
THE ISLAMIC REPUBLIC OF IRAN, et al.,)		
)		
Defendants.)		
<hr/>)	

DECLARATION OF SARA HALPERIN

Sara Halperin declares pursuant to 28 U.S.C. §1746, as follows:

1. I am an American citizen and currently reside in New York.
2. I am the mother of Chana Braun and mother-in-law of Shmuel Braun, who currently reside in Jerusalem.
3. I was and am extremely close with my daughter and son-in-law, speaking to them regularly by phone even while they live abroad.
4. In October 2014, I was visiting Israel to celebrate the holidays of Yom Kippur and Succot with my daughter and her husband.
5. My husband and I were especially grateful that year because Chana had finally had a baby, after many unsuccessful attempts to get pregnant.
6. Before I left to go back to the United States, on October 22, 2014, Chana surprised me by bringing my granddaughter, Chaya Zissel, over to say goodbye. I did not realize at the time that it would be the last time I would ever see her.

7. I left Israel on a 4:00 pm flight to John F. Kennedy Airport in New York. I flew home with my 19 year-old daughter. My husband stayed in Israel for a wedding and his mother's *yahrzeit*, a memorial service on the anniversary of his mother's death.

8. When my daughter and I got off the plane, I saw my sister-in-law and several of my other children waiting for me in the area before passport control. I asked them what they were doing there, since I knew no one is allowed in that area. It was then when I realized something was wrong.

9. My sister-in-law, Estee, told me to sit down in a wheelchair, because they had something to tell me.

10. When I sat down, she told me that there had been an accident, and Chaya Zissel had been killed. Then she told me that there was a funeral for the baby.

11. I had lost loves one before—my parents died several years ago—but this loss was beyond my comprehension. I was inconsolable and could not bear the thought of how my daughter and son-in-law were suffering. I was hysterical and could not stop shaking.

12. I spoke to my rabbi, and he told me I should go back to Israel to be there for my daughter and her husband. Two hours later, I got on a plane back to Israel with Estee and my oldest daughter, Dini. I cried the entire flight and could not sleep. I could not stop thinking about what I was going to tell my daughter and son-in-law to console them.

13. When I arrived at my daughter's apartment building, I saw my husband being interviewed by television reporters.

14. I went upstairs to find people consoling my children. The minute my daughter saw me, she ran to me, fell into my arms and could not stop crying.

15. My husband and I have eight children and have endured difficult situations with our children, but this was by far the hardest. Seeing my child in so much pain made me feel completely helpless. I wanted to do anything to make her feel better, but there was nothing I could do. The pain I felt was excruciating. I cannot imagine hers.

16. I sat with Chana and Shmuel for the *shiva*, a weeklong mourning period. I wanted to be at their sides and hold Chana's hands.

17. Leaving Israel and going back to New York was extremely difficult. I wanted to stay, but I knew that I could not because I had a younger daughter at home who also needed me. My other children were also having a very hard time; they are extremely close, and they did not know what they could do for Chana and Shmuel.

18. Around the time of Chaya Zissel's death, one of our son-in-laws was diagnosed with cancer. My children waited a month to tell us, because they knew we would not be able to handle it.

19. I have not been able to sleep through the night since the terror attack. Thinking about Chana and Shmuel watching a car ram into their baby's carriage, and then seeing her on the sidewalk covered in blood, is horrifying. I have flashes of this scene in my mind on a regular basis.

20. I constantly feel helpless because I am not able to relieve Chana and Shmuel of their suffering. They have changed so much since Chaya Zissel's death; they are much quieter and less social. It is often difficult to connect with them.

21. My husband and I will never be the same. I have constant nightmares and feel depressed.

22. I wanted to get help from a therapist, but we are not able to afford it.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 22, 2016

A handwritten signature in black ink that reads "Sara Halperin". The signature is written in a cursive style with a large initial 'S' and a long, sweeping tail.

Sara Halperin

EXHIBIT 7

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SHMUEL ELIMELECH BRAUN, et. al.)		
)		
Plaintiff,)	Civ. No. 1:15-cv-01136-BAH	
)		
v.)		
)		
THE ISLAMIC REPUBLIC OF IRAN, et al.,)		
)		
Defendants.)		
)		

DECLARATION OF MURRAY BRAUN

Murray Braun declares pursuant to 28 U.S.C. §1746, as follows:

1. I am an American citizen and currently reside in Los Angeles, California, with my wife, Esther Braun.
2. I am the father of Shmuel Braun, and father-in-law of Chana Braun, who currently reside in Jerusalem.
3. I have always had a very close relationship with Shmuel, who is my youngest child. I spent a lot of time with him when he was growing up. He continued to live at home with his mother and me for two years after high school.
4. I also have a very good relationship with Chana. Chana and Shmuel visit us in Los Angeles approximately every six months. Either my wife or I speak to Shmuel or Chana every day.
5. When Chaya Zissel was born in July 2014, we called Shmuel and Chana right away. They regularly sent us pictures of the baby.

6. Esther and I planned on visiting Israel in November 2014. We knew Chana would have a baby a few months prior, and we had another grandson who was having a bar mitzvah in Israel in November, but we were never able to meet Chaya Zissel in person as we had planned.

7. On the morning of Wednesday, October 22, 2014, I was at work when my wife called me. She told me that there had been a terrible accident and that Chaya Zissel was very badly hurt, and that Shmuel was also hurt and was in the emergency room.

8. On the way home from work, Chana's father called me and told me what had happened. He told me that Chaya Zissel was in a bad condition, and that he believed she was already brain dead. He told me Shmuel was still in the emergency room, and he was not sure of his condition.

9. When I got home, Esther told me that the accident had been a terror attack. I went on my computer and saw a story that said, "Three month-old baby killed in terror attack by light rail." Although the article did not provide a name of the baby, I knew Chaya Zissel was exactly three months-old. I was in a state of shock and could not believe what I was reading. Esther and I were both in denial that this was actually happening.

10. Chana's father called twenty minutes later, confirming that Chaya Zissel had died. I felt completely shocked and in pain. I was particularly pained when I heard that a terrorist had purposefully rammed his car into the baby's carriage, and that she had been thrown dozens of meters from her stroller.

11. We were also panicked about our son and what his mental and physical state was. We cried and we worried and we panicked.

12. We continued calling Shmuel, but could not reach him. It was only hours later that we heard through a friend that he had been released from the hospital.

13. Local rabbis, close friends, and Israeli consulate members came to our house when they heard the news. My wife and I could not stop crying.

14. My wife and I went to the airport to find a flight to Israel. On the televisions in the airport, I kept seeing news of the terror attack that had killed my granddaughter. I had to turn away from the television because it was too painful to see pictures of the baby.

15. My wife and I did not make it to the funeral, which was held on the same day as the attack. While we were waiting at the airport, someone found the funeral on the television, so we could hear what was going on. It was terrible to have to listen to the funeral on television and to not be there with my son to comfort him.

16. We finally got to Israel early in the morning on Friday, October 24. When I got to my son, it was very emotional. It was extremely painful thinking that Shmuel and Chana could have also been killed.

17. We spent the week with Shmuel and Chana in their apartment. They had many visitors who came to comfort them, but they could not be comforted.

18. Shmuel and Chana were strong, but would frequently break down. It was very painful to see their distress.

19. One day that week, I went outside with Shmuel to walk to the synagogue. A car was coming down the street, and Shmuel became hysterical, thinking that the car was going to hit him. He could not stop reliving the accident.

20. Leaving Chana and Shmuel to go back to the United States was extremely painful. My wife and I were both very emotional.

21. We came back three weeks later for the “shloshim,” marking that thirty days had passed since Chaya Zissel’s death. We visited the baby’s grave, but Chana and Shmuel could not bring themselves to go. We cried when we saw the grave.

22. I keep pictures of Chaya Zissel in my kitchen and on my desk. I feel a constant pain for myself, and for my son and daughter-in-law. I feel a permanent void, since I never had the opportunity to meet her, hold her, make her smile. It was extremely painful for a long time when we saw grandparents walking with their grandchildren.

23. Since the terror attack, I have frequently been unable to sleep. Esther also has had many sleepless nights.

24. I went to synagogue to say “kaddish,” the mourner’s prayer for the dead, every day for 11 months even though I was not required to do so as the grandfather.

25. For a year, my wife and I did not go out with friends or attend any festive occasions because we were in mourning and could not bring ourselves to celebrate.

26. Hearing about terror attacks triggers horrible emotions for us including stress, pain and anxiety.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 24, 2016



Murray Braun

EXHIBIT 6

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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SHMUEL ELIMELECH BRAUN, et. al.)		
)		
Plaintiff,)	Civ. No. 1:15-cv-01136-BAH	
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v.)		
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THE ISLAMIC REPUBLIC OF IRAN, et al.,)		
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Defendants.)		
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DECLARATION OF ESTHER BRAUN

Esther Braun declares pursuant to 28 U.S.C. §1746, as follows:

1. I am an American citizen and currently reside in Los Angeles, California.
2. I am the mother of Shmuel Braun, and mother-in-law of Chana Braun, who currently reside in Jerusalem.
3. Both of my parents are Holocaust survivors who were in Auschwitz. Being raised by Holocaust survivors made me extremely protective of my family; my entire life is focused on my children.
4. Shmuel is my youngest child. For all his life he was a happy, loved, smart child, and we had a great relationship.
5. I also have a great relationship with Chana, whom I love as if she were my own daughter.

6. I never had the chance to meet my granddaughter Chaya Zissel. I had been in Israel in the spring of 2014, before she was born, and I was planning on coming back in November to meet her.

7. The morning she died, my phone rang, and it was Chana. She told me to sit down, and then told me that there had been a bad accident involving a terrorist, and that Shmuel was in the emergency room. Before I could ask questions, she had to hang up the phone.

8. After Chana hung up, I turned on a Jewish television station and saw that there had been a terrorist attack, and that a three month-old baby had been killed. I knew that the baby was my granddaughter, and I started shaking and crying. Chana called back a few minutes later and said Shmuel was also in the emergency room, but he would recover.

9. I also spoke with Chana's father a couple of times. At one point, after I hung up with Chana's father, Shmuel called and told me what had happened. He and Chana had taken the baby to the Western Wall, and then the baby had been badly hurt on their way back. I tried to console him, but I could not.

10. The story of Chaya Zissel's murder in a terrorist attack was on television constantly, and I could not escape seeing pictures of the baby and being reminded of the attack. I felt exhausted and emotionally drained.

11. My husband and I left immediately for Israel to be with Shmuel and Chana.

12. On the plane to Israel, the stewardess handed me the Jerusalem Post and I saw a picture of Chaya Zissel. I told the stewardess that the baby who was killed was my granddaughter. The stewardess knew her name and told me everyone knows about her death.

13. I arrived on the morning of Friday, October 24, 2014, and I stayed until the night of Sunday, November 2, 2014. Throughout the week, there were constantly visitors who came to mourn the death of Chaya Zissel.

14. After my granddaughter's death, it was extremely difficult for me to hold a baby, because it would always make me think about Chaya Zissel.

15. I had trouble sleeping. I frequently awoke in the middle of the night, thinking about the baby being thrown out her carriage and hurting her head.

16. I still cry when I talk about my granddaughter's death. I feel pained thinking about how my son and daughter-in-law suffered, and continue to suffer, from the loss of their child. Like any mother, I feel my children's pain, as well as my own.

17. It is also extremely painful for me when I hear about other terrorist attacks because it triggers memories of the attack that killed Chaya Zissel.

18. My relationship with Shmuel has sometimes suffered because of the attack. We used to talk every single day, and now he does not call as frequently. His withdrawal and sadness causes me a great amount of distress and sadness.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 23, 2016

A handwritten signature in cursive script, appearing to read "Esther Braun".

Esther Braun

EXHIBIT 5

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SHMUEL ELIMELECH BRAUN, et. al.)	
)	
Plaintiff,)	Civ. No. 1:15-cv-01136-BAH
)	
v.)	
)	
THE ISLAMIC REPUBLIC OF IRAN, et al.,)	
)	
Defendants.)	

DECLARATION OF PLAINTIFF SHMUEL ELIMELECH BRAUN

Shmuel Elimelech Braun, citizen of the United States and resident of Jerusalem, Israel, declares pursuant to 28 U.S.C. § 1746, as follows:

1. I am a United States citizen currently living in Israel and I am suing both for myself and on behalf of my deceased daughter, Chaya Zissel Braun, who was also a U.S. citizen who was living in Israel at the time of her tragic death.
2. I am a resident of Israel and currently reside in Jerusalem, Israel.
3. My wife, Chana, who is also a United States citizen residing in Israel, and I met in Israel and we were married in June 2012 in the United States.
4. Chana and I had two children: Chaya Zissel Braun (born July 31, 2014 and died October 22, 2014) and R.C. Braun (born August 9, 2015).
5. Chaya was a miracle child for us. Prior to her birth, Chana and I had suffered numerous failed attempts to conceive a child for over a year. The moment Chaya was born, we instantly fell in love with her. She was an amazing baby, adorable and lively.

6. On Wednesday, October 22, 2014, Chana and I decided to take Chaya with us on a visit to the Western Wall. On the way back from the Western Wall, we took the light rail and got off at the Ammunition Hill station. We began to walk while pushing Chaya in her stroller.

7. After walking for only a few seconds on a pedestrian walkway, Abdel Rahman Shaludi (a member of Hamas), who was driving a car at high speed in a heavily populated pedestrian area, crashed his vehicle deliberately into us. As a result, Chaya was thrown out of her stroller, I was thrown to the ground after being pushed into the moving train, and my wife was screaming Chaya's name.

8. I am unsure exactly who first found and picked up Chaya. I am also unsure who was holding her when the ambulance came. It is all a blur. I know I was limping and in terrible pain. The ambulance transported all of us to the emergency room at Hadassah hospital.

9. When we arrived at the hospital, the doctors took x-rays of my knee and ribs, while Chana, along with her father, sisters, and brothers-in-law, sat in the waiting room.

10. All that we could think about during all those hours of anxiety and uncertainty in the emergency room was our precious daughter, hoping and praying she survived the incident. Every hour in that waiting room felt like eternity.

11. After about two hours of waiting, Dr. Wexler came into the waiting room and told us, with a heavy heart, that Chaya had died.

12. Upon hearing this devastating news, my wife, her family and I burst into tears. It was earth shattering to be confronted with the fact that our most precious possession had been taken from us at the tender age of 3 months in such an arbitrary manner. It was also hard to process that someone had done this on purpose to a baby. Chana and I were then left alone to

mourn together and try to comfort one another and to say goodbye. We wrapped Chaya up in cloth and held her lifeless corpse in our arms for about an hour.

13. After we left the hospital, we held a funeral for Chaya and mourned in our apartment during the *shiva* (traditional seven day mourning period). Chana and I were overwhelmed with grief.

14. It is reasonable to assume that Chaya Zissel suffered after the terror attack. She survived for approximately two hours while the paramedics and emergency room physicians worked on her and fought to save her life. There is no conclusive indication that she did not regain consciousness at all during that time. I am haunted by the thought that she could have suffered.

15. In an attempt to move on from Chaya's death, Chana and I tried to divert our minds from the tragedy by occupying ourselves with other activities. For example, Chana kept herself busy by generally trying to find things to do outside the apartment whenever I was not home. As for me, I attempted to get my mind off of Chaya's death by continuing to study at yeshiva for the next 5 months and traveling for Shabbat during that winter.

16. All my attempts to push my daughter's death away have proven to be in vain. By the summer time, I could no longer put my grief aside. Up until that time, I had been in a state of denial, trying to live life normally, as if the tragedy had never happened. But, eventually, the cruelty of reality had hit me and I simply could not take it anymore. So, I gave up yeshiva altogether and started therapy with a clinical social worker.

17. Ever since my beloved daughter's tragic death, my life has not, and never will be the same again. My daughter's death has left a void in my heart that I cannot fill with yeshiva or any other activity or distraction.

18. I cannot last a day, or possibly even an hour, without mourning the fact that Chaya was taken from us after she had only been with us for 3 short months.

19. I cannot avoid thinking about all the days and years that I could have spent with my daughter if it wasn't for that brutal murder.

20. My only consolation is that Chaya may be in a better place.

21. The death of my daughter has impeded my ability to relax and enjoy life. Every day I have a perpetual fear that something tragic will happen and the fear is so serious that I am undergoing therapy in aim to prevent this fear.

22. I avoid walking close to the street and I walk near buildings whenever possible because I am afraid that if I walk close to the street, a car will crash into me as it did on that day.

23. I have never gone near the train station since my daughter's death, except for the one time the city of Jerusalem held a memorial ceremony. Also then, the main reason I attended the station was due to the strong security guarding the place. Other than that, I avoid the train station like the plague because it would be unbearably traumatic for me to visit the site where my daughter was murdered in cold blood.

24. Not only do I avoid the train station where I was on October 22, 2014. I avoid all train stations and I have never traveled by train since October 22, 2014 because doing so would revive too many memories of that tragic day and I am afraid that if I were to travel by train, another terrorist might storm a car through innocent passengers at any given moment.

25. I only travel by buses that are close to home and even when I ride the bus, I cannot simply relax and enjoy the ride. I must be alert and keep a constant watchful eye for any sign of danger.

26. I shake whenever I hear a loud boom because that noise reminds me of the sound of the car crashing.

27. My wife and I did not go to the Western Wall for a long time after the terror attack and now we rarely ever go there and only with extreme caution and anxiety. This is true even though it is our religion's most holy place. For us, the Western Wall serves as a reminder of our daughter's death.

28. I try not to leave my house whenever possible because no matter where I go, I am in a constant state of anxiety and fear that another disaster will strike. For example, one time when my parents were visiting and they wanted to go to the Dead Sea, I refused at first to join them because it is too far from home and I am afraid of the roads leading to the Dead Sea. Only after a lot of cajoling did I finally agree to go, but with a lot of anxiety and fear. Even more recently, in the winter of 2015, my parents came and went to visit the northern part of the country and I refused to go and did not go for fear of traveling on the roads.

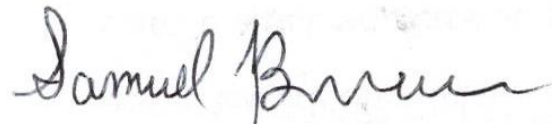
29. I am also very afraid of being around Arabs because one of them is the murderer of my daughter. For example, I was very nervous and anxious when the store near my house hired an Arab butcher, which was especially frightening because he worked with knives. I know this is not rational, but it is something I have to live with in my every day life.

30. In short, my daughter's murder by a Hamas terrorist has robbed me of the normal, simple, and pleasurable life I once had before October 22, 2014.

31. In addition to the emotional and psychological distress, the terrorist attack has caused me physical injuries. I sustained from the terrorist attack several physical injuries, including broken ribs and a torn ligament in my knee. My knee continues to cause me physical pain to this day.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 22, 2016

A handwritten signature in black ink that reads "Samuel Braun". The signature is written in a cursive style with a large initial 'S' and a long, sweeping tail.

Shmuel Braun

EXHIBIT 4

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

)	
SHMUEL ELIMELECH BRAUN, et. al.)	
)	
Plaintiff,)	Civ. No. 1:15-cv-01136-BAH
)	
v.)	
)	
THE ISLAMIC REPUBLIC OF IRAN, et al.,)	
)	
Defendants.)	
)	

DECLARATION OF PLAINTIFF CHANA BRAUN

Chana (“Chanie”) Braun, citizen of the United States and resident of Jerusalem, Israel declares pursuant to 28 U.S.C. §1746, as follows:

1. I am a United States citizen. I was born in New York.
2. I currently live in Jerusalem, Israel and I am suing both for myself and on behalf of my deceased daughter, Chaya Zissel Braun, who was also a U.S. citizen who was living in Israel at the time of her tragic death.
3. I married my husband, Shmuel (“Shmuli”), who is also a United States citizen residing in Israel, in June 2012, and we moved to Jerusalem, so Shmuli could study in *yeshiva*.
4. We tried to conceive a child unsuccessfully for over a year following our wedding. We were extremely concerned that we would not be able to have a child, and we were especially disheartened because of the pressure in our community to have a child right after marriage. I ran a kindergarten in Jerusalem, and it was difficult to be around children when I was having trouble conceiving a child of my own.

5. On July 31, 2014, our first child, Chaya Zissel Braun, was born. She was beloved by Shmuli and I. Chaya was a happy and healthy infant.

6. On October 22, 2014, when Chaya Zissel was three months old, Shmuli and I took her to the Western Wall (the “Kotel”), to pray for my brother-in-law, who was diagnosed with cancer.

7. We took a bus to the Kotel. While we were there, we took family pictures, prayed, and told Chaya Zissel about the significance of the Kotel.

8. We left the Kotel by bus. We were planning to visit *Ita*, my sister. In order to get to *Ita’s* house, we had to transfer to the light rail. We took the light rail and disembarked at the Givat Hatachmoshet (Ammunition Hill) station in Jerusalem.

9. When we disembarked from the train, I was walking next to the train, and Shmuli was to my right, pushing Chaya Zissel in her stroller.

10. After walking for about thirty seconds, a car came out of nowhere, driving straight into us. The driver rammed into Shmuli, who was with the carriage, and hit several other pedestrians. I could tell the driver had purposefully hit us, because he accelerated as he drove towards us and drove directly between the train and the bus station, without hitting either of them.

11. The car completely smashed the carriage and knocked Shmuli into the moving train. I began screaming, “Shmuli get up, where’s the baby?” As Shmuli got up, I turned around and was horrified to see Chaya Zissel had been knocked out of her carriage and sent flying about 20 feet away from us.

12. I ran to pick her up and quickly brought her over to Shmuli, screaming for help, shouting for someone to call Hatzalah (like 911). I could see that the baby's head was deformed and smashed, and that she was bleeding.

13. As I was yelling for someone to call Hatzalah, I heard gunshots and thought the terrorist was shooting at us. After, we realized that the gunshots were coming from the police, who shot the terrorist.

14. A policeman came over to me and took Chaya Zissel. Chaya began vomiting. The fact that she was vomiting gave me hope; I had not yet realized the severity of her injuries.

15. People began to crowd around us yelling, "Terror attack! Terror attack!" and I was becoming increasingly hysterical.

16. When the paramedics arrived, they first attended to another victim, who was convulsing. I yelled to the paramedics to help my baby. A paramedic, Mr. Steinhart, pulled up on his motorcycle. I ran to him and asked him to check my baby. He and several other paramedics began to attend to Chaya Zissel.

17. I was shaking the entire time that Mr. Steinhart was checking Chaya Zissel. Someone handed me a water bottle, and I tried sitting down on a parked motorcycle, but the motorcycle kept tilting, so I remained standing. My husband was trying to make me calm down. A yellow ambulance pulled up. Paramedics took Chaya Zissel into the ambulance.

18. As I was waiting next to the ambulance, I borrowed a Hatzalah member's phone to call my father, who was in Israel at the time. When he picked up, I tried to speak as calmly as I could and told him that we were attacked by a terrorist, and that Chaya Zissel was severely injured. I told him they were probably taking her to Hadassah Hospital in Mount Scopus until they could stabilize her.

19. The ambulance took us to the hospital. As we arrived we were asked to be quiet and were informed that only one of us could come into the emergency room with the baby.

20. As I walked next to the stretcher, I begged the paramedic to tell me what Chaya Zissel's condition was. He said that they had managed to get her breathing back. His comment shocked me since I had not been aware that she stopped breathing in the first place. The paramedic suggested that we should immediately get the baby into the hospital, so the doctors would be able to stabilize her condition.

21. Moments after I entered the emergency room, Shmuli came into the room. We kept looking at each other in shock and crying. We could not grasp what had just happened.

22. The mayor of Jerusalem, Nir Barkat, came to visit us in the hospital. My husband asked him to do something to help us; unfortunately, there was nothing he could do.

23. Shmuli told me to call his parents, who were in the United States, to tell them about the attack. Shmuli and I were scared to call them, since we knew how upset they would be. Shmuli said that his mother should know that the baby is injured. At last, I decided to call her.

24. When I called Shmuli's mother, it was difficult to keep my voice steady. I asked her to sit down, and then informed her that we had been in a car accident and that Chaya Zissel was hurt. I asked her to tell everyone to pray for my baby. Shmuli's mother was frantic and began asking questions about the attack: who the driver was and if Shmuli is okay.

25. I told her that Shmuli and I were fine, but Chaya Zissel needs help from God, and I asked her again to ask everyone to pray for her. I also told her to call our siblings, and I said that if she wants to see more details about what happened, she should check "Yeshiva World

News.” When Shmuli’s mother checked the news, she found a report that a three month-old baby had been killed. She began to panic.

26. After an hour or so, the doctor came out and told us that the baby’s prognosis wasn’t looking good, but the doctors had not yet given up. My father did not think it was a good idea to keep checking on the baby, so he kept directing me back to the staff coffee room.

27. About two hours later, the doctor came into the room we were sitting in. I could tell from his face that he had bad news. He came to inform us that our baby had died of intracranial bleeding.

28. I remember crying and screaming after hearing the news. Everyone in the room (several of our family members and friends had come to the hospital) was sobbing with us.

29. The doctors brought us Chaya Zissel to hold for the last time. Then, my father took Chaya Zissel and exited through the back exit. We left the hospital through the emergency room front doors.

30. It is reasonable to assume that Chaya Zissel suffered after the terror attack. She survived for approximately two hours from the time of the attack, at the scene of the attack and while the paramedics and emergency room physicians worked on her and fought to save her life. There is no definite indication that she did not regain consciousness at all during that time.

31. It breaks my heart to think that she may have suffered.

32. When we left the hospital, we were supposed to be following a friend in his car. However, we were nervous that he would pass the scene of the attack, which would have been very traumatic for us, so we decided to drive another way.

33. When we got home, we were still in total shock. I recall thinking, why are we home after such a long day without the baby?

34. We buried Chaya Zissel that evening. Israeli President Reuven Rivlin and Jerusalem Mayor Nir Barkat were present at the funeral.

35. Many friends, family, and students from the *yeshiva* where my husband studies came over to visit us during the *shiva* (the traditional seven day mourning period). I remember my father sobbing. I had never seen him cry in this way before. I was in shock and overwhelmed. Most of the *shiva* was a blur to me.

36. We learned later that the driver was an Arab resident of the east Jerusalem neighborhood *Silwan*, which is very close to where we were living. This added to our trauma and anxiety.

37. Since my Chaya's murder, I frequently feel depressed. At times, I cannot bear to be alone and, when I am not distracted, I feel overwhelming pain. Many nights, I am unable to fall asleep. The few nights I get some sleep are often with terrifying dreams. Due to this, I began seeing a therapist in Jerusalem.

38. I tried to resume work and a daily routine, but it is extremely difficult for me. There are days I can function adequately, and other days that I feel as if I am paralyzed.

39. After Chaya Zissel's murder, it was difficult for me to be around people with babies. When I see a friend's baby who was the same age as Chaya Zissel, I can't avoid thinking what Chaya Zissel would have been like if she had had the opportunity to grow up.

40. My husband and I are constantly feeling anxiety and depression. This has affected our relationship. At times, I need him to comfort me and be there for me, yet sometimes it is hard for me to do the same for him.

41. In August 2015, we were very fortunate to welcome our second baby, R.C. Braun.

42. Chaya Zissel's murder has somewhat affected my ability to care for R.C. It is too painful for me to take her on the light rail. At first, I would not take her outside in a stroller at all. Eventually, I got the courage to take her out on Saturdays, when we will not be able to hear cars.

43. Anything that triggers memories of Chaya Zissel causes me deep pain and feelings of loss. For example, diaper bags that look like hers, children her age, the type of pacifiers she used to have. Even the stroller we used for her. I will not use anything for R.C. that reminds me of Chaya Zissel.

44. The trauma that I experienced due to Chaya Zissel's violent murder has affected my psychological and physical well-being. I am certain this pain will never go away. I will simply learn each day a little bit more to cope with it.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 22, 2016

A handwritten signature in cursive script that reads "C. Braun".

Chana Braun

EXHIBIT 3

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

-----X
SHMUEL ELIMELECH BRAUN, *et al.*,

Plaintiffs,

Civ. No. 15-01136 (BAH)

v.

THE ISLAMIC REPUBLIC OF IRAN, *et al.*,

Defendants.

-----X

DECLARATION OF ARIEH DAN SPITZEN

I, Arieh Dan Spitzten, of Jerusalem, Israel, this 23rd day of May, 2016, declare pursuant to 28 U.S.C. § 1746, as follows, subject to the penalties for perjury:

A. Professional Background

1. I am an expert in Palestinian affairs and society, including the political, social and economic aspects of Palestinian society, the modes of operation of the Palestinian Authority and the modes of operation and conduct of various Palestinian Islamic terror groups, including Hamas and Palestine Islamic Jihad, with emphasis on the civilian infrastructures of those terror groups, in particular Hamas, which I have researched (and continue to research) over the course of many years.

2. I have been researching Palestinian issues in Israel and the territories for approximately 40 years. I hold academic degrees in the History of Islamic Countries and the History of the Jewish People from the Hebrew University of Jerusalem where I graduated with honors.

3. From 1976 to 2009, I served in various positions, mostly within the Israel Defense Forces, focused on researching Palestinian Affairs. In 1976, I established the Research Section of the Advisor for Arab Issues in the Military Government in the West

Bank, which I headed for two years. From 1978 to 1981 I researched the integration of the Arab population into Israeli society for Jerusalem's Van Leer Institute. During this time, I also published an academic article about Jerusalem's economy in the 18th Century which was published in "Cathedra."

4. From 1981 to 1993, I served as Head of the Research Section in the Office for the Advisor for Arab Affairs in the West Bank and as Deputy Advisor. In these capacities, I was involved in researching the socio-economic and political situation of the Palestinian population, while focusing on political and social trends and the prevailing atmosphere. I supervised a team of approximately ten researchers. During this period, I prepared and supervised the preparation of hundreds of research papers, staff papers, articles, anthologies and studies in Palestinian civilian matters, which were used by high level officials in the Israeli government and military. All of my writings for the IDF are considered classified and cannot be publicly disclosed.

5. From 1993 to 1996, I participated in the negotiation of the Oslo Accords and was a member of the team that negotiated the transfer of civilian powers and responsibilities from the Civil Administration to the Palestinian Authority.

6. From 1998 to 2000, I served in the Civil Administration as Department Head for Palestinian Affairs in the West Bank at a rank of Colonel.

7. From 2001 to 2009, I served as Department Head for Palestinian Affairs in the Administered Territories (which includes both the West Bank and Gaza) and as the Advisor to the Coordinator of Government Activities in the Territories (COGAT) at a rank of Colonel. I reported to the Head of COGAT, above whom were only two people – the Minister of Defense and the Chief of Staff. In these capacities, I was responsible (among other things) for supervising the work of IDF research and assessment personnel in various fields relating to Palestinian Affairs drafting and presenting research and policy papers concerning Palestinian affairs, and appearing before and providing briefings to senior governmental and military

forums regarding Palestinian affairs. I supervised approximately 50 people. As part of my position I also provided numerous briefings about Palestinian affairs in Israel to foreign officials. During this time, I became the top authority on the socio-economic civilian situation in the West Bank and Gaza and was responsible for writing hundreds of surveys and studies about civilian conditions, political and social trends, the economic atmosphere and its influence and other diverse civilian issues connected to the civilian Palestinian realm. Naturally, this research overlapped into the military sphere and to the activities of terror organizations like Hamas and others. In addition, each year I was responsible for writing and updating a comprehensive survey regarding the civilian infrastructure of the Hamas – the *Da'wa*.

8. Since my retirement from the IDF, I have continued to serve in the IDF Reserves as an emergency Department Head for Palestinian Affairs in the Administered Territories in COGAT. In that capacity, I continue to be fully up to date in all that occurs in the Palestinian realm, including in all matters relevant to the current and recent terror waves, their different characteristics, the profile of the terrorists and the influence of the Palestinian powerbrokers.

9. I am currently an independent consultant on the Middle East, particularly Palestinian Affairs, to government agencies, research institutes and private parties. I currently provide advice regarding the socio-economic political civilian situation in the Palestinian Authority controlled territories to the following governmental entities: The Operation Coordinator in the Administered Territories and the Research Division of the Intelligence Department. During the last ten years of my IDF service, I also provided advice to the National Defense Council, Israel security agencies and the Mossad.

10. I have previously been designated and qualified by federal courts as an expert witness on issues related to Palestinian affairs and Hamas, including in: *Linde, et al. v. Arab Bank, PLC*, Case No. 04-02766 (E.D.N.Y.); *Strauss, et al. v. Credit Lyonnais, S.A.*, Case No.

06-00702 (E.D.N.Y.) and *Gill, et al. v. Arab Bank, PLC*, Case No. 11-03706 (E.D.N.Y.). I also served as an expert consultant to the plaintiffs' trial team in *Sokolow, et al. v. Palestine Liberation Organization, et al.* Case No. 04-0397 (S.D.N.Y.) in which the plaintiffs received a jury award of over \$655 million in February 2015.

11. Additionally, I have served as an expert witness in the area of Palestinian affairs in dozens of civil and military cases in Israel, including in the Israeli Supreme Court.

12. During my last ten years in the IDF, I was a frequent participant and lecturer on the issue of Palestinian affairs at symposiums, conferences, seminars and other academic meetings sponsored by Israeli universities and research institutes. I continue to lecture in academic settings on occasion.

13. I am a popular media commentator for the Israeli press, which considers me an expert in Palestinian affairs and I am often interviewed on Arabic television stations. I recently appeared on Israel Channel 1's "A Second Look" on a program titled "The Color of Terror Money," available at the following link: <http://www.iba.org.il/program.aspx?scode=1930171>. In addition, during the last ten years of my IDF service, around once or twice per week, I gave both background and in-depth talks to senior Israeli journalists and foreign correspondents of the international media in Israel that deal in Palestinian and military issues.

14. I am fluent in Hebrew and Arabic.

15. A copy of my CV is attached hereto as Exhibit A.

B. Nature of this Expert Witness Report

16. I have been asked by counsel for the plaintiffs in the case of *Braun, et al. v. The Islamic Republic of Iran, et al.* (15-01136) (BAH) to provide my professional opinion concerning Hamas's responsibility for the car ramming attack at issue in this case.

17. My opinion, as set forth below, is based upon my academic studies, research and IDF military service over the course of many years in which I specialized and continue to

specialize in Palestinian affairs and Palestinian terrorist organizations such as Hamas. During my 40 years researching Palestinian affairs, I have obtained information from numerous sources many of which are classified, but which also include interviews with government officials and reliable journalists, reviews of publicly available documents, periodicals, credible news reports, government publications and scholarly works.

18. Moreover, in preparing this opinion, I have examined the complaint in the above referenced case filed by the Braun plaintiffs against the defendants, the Israeli police file for this terror attack and other relevant court files.

19. The original Hebrew version of my opinion is attached hereto as Exhibit B

C. Background Concerning the Terror Wave at the End of 2014

20. On 22 October 2014, shortly before 6:00 pm, while the light rail train was at the Ammunition Hill station in Jerusalem,¹ a car driven by the terrorist Abd al-Rahman al-Shaludi² traveled toward the station from the direction of French Hill. The terrorist steered the car off the road and onto the light rail tracks toward the station's platform just as passengers were alighting from the stopped train. Among those hit by the car were a father and baby (baby girl Chaya Zissel Braun, whose murder is at the center of this lawsuit filed by her parents and grandparents). As a result of this terrorist attack another woman was killed and seven people were wounded. The car-ramming terrorist, Abd al-Rahman al-Shaludi, escaped through the car window and fled the scene. He was chased and shot and died of his wounds at

¹ Ammunition Hill is located in northern Jerusalem, near the French Hill and Ramat Eshkol neighborhoods. It is adjacent to the segment of Road 1 leading from the northern neighborhoods of Jerusalem to the city center. Along this axis run the light railway tracks, connecting the city's northern neighborhoods with the city center and western neighborhoods. The Ammunition Hill station is located opposite the national headquarters of the Israel Police.

² A detailed profile about him can be read in a separate chapter at the end of this Expert Opinion.

the hospital a few hours later.³ (A detailed description of the attack will be provided later in this Expert Opinion).

21. This Terrorist Car Ramming Attack is one of the attacks in the terror wave that flooded Israel from the summer of 2014 through the end of 2014. This Terrorist Car Ramming Attack set – and is still setting – an example to those who perpetrated the attacks that followed both in that terror wave and in the current renewed terror wave which broke out in last third of 2015 and continues until today. The wave of terror that began in August 2014 against the backdrop of the summer 2014 armed conflict in Gaza (dubbed Operation Protective Edge) and other events has been characterized by a varying intensity in the volume of attacks.

22. Towards October 2014, the number of terrorist attacks increased significantly as a result of increasing incitement by Islamist organizations such as Hamas and the Islamic Movement in Israel, as well as by the Palestinian Authority. These organizations accused Israel of a litany of offenses related to changing the status quo on the Temple Mount, including harming the mosques on the Mount, allowing Jews to pray there, and having a long-term vision of destroying the Al-Aqsa Mosque and building a Jewish temple in its stead. Such accusations have given a religious motivation to the wave of terror, which is being fueled by the slogan "Al-Aqsa is in Danger!!!". The need to defend the sanctities of Islam quickly became the main justification for the perpetration of these terrorist attacks.

³ The description of the attack is based on a paper issued by the Meir Amit Intelligence and Terrorism Information Center, on October 23, 2014: www.terrorism-info.org.il/he/articleprint.aspx?id=20722.

The description is also based on statements given to the police by multiple witnesses, who were at the scene of the attack when it took place. Most of the witnesses were passengers of the light railway, who were either waiting for the railway at the station, or alighting from the railway that arrived to the station. Others were employees of the light rail or the police.

23. The most salient characteristics of this wave of terror in the second half of 2014⁴ are stabbing and vehicular attacks and the use of weapons of opportunity (knives, vehicles, etc.), which do not require large-scale preparations and extensive logistic planning or sources of funding. Even the perpetrators' own preparation ahead of such attacks is relatively simple, since it is usually an individual terrorist or two terrorists joining up. Therefore, there is no need to form a terrorist cell with a command hierarchy and a supporting array of accomplices.

24. Of particular interest to this Expert Opinion is the relationship of the terrorist organizations to the attacks which has a different dynamic in the recent waves of terror than in the past. Incitement to carry out attacks comes from the influential political factors, including terrorist groups in the Palestinian arena. Palestinian Authority leaders and Hamas leaders are sounding praises and encouragement to the terrorists and their activities, using the media outlets at their disposal (radio, television, newspapers, websites and to a very large extent - social networks).⁵ This creates an atmosphere of incitement that encourages the perpetrators

⁴ For a detailed review of attacks and victims in 2015, see a yearly review published by the Israel Security Agency (ISA): www.shabak.gov.il/publications/study/Pages/ReportY2015.aspx.

⁵ See for instance several examples from the various reviews, analyses and articles on this issue:

* An article on the role of social networks in creating the inciting atmosphere surrounding the attacks: www.ad-hoc-news.de/four-dailies-eight-tv-stations-and-scores-of-radio-stations-report-on-the--/de/News/46572647

* A review issued by the Middle East Media Research Institute (MEMRI) on "Social Networks As Incitement Platforms": www.memri.org.il/cgi-webaxy/sal/sal.pl?lang=he&ID=875141_memri&act=show&dbid=articles&dataid=3983

* A review issued by the Meir Amit Intelligence and Terrorism Information Center: "The Social Networks As a Source of Inspiration and Imitation for Terrorists": www.terrorism-info.org.il/Data/articles/Art_20950/E_026_16_2139465664.pdf

* The website of the Jerusalem Post daily: "Photos: Social Media and Palestinian Incitement During Terror Wave":

to rise up and take action. Unlike past terrorist attacks, there are no specific directives to carry out a particular attack that would require a system of approvals and instructions. Rather, there is an overall call to carry out attacks with such characteristics as described above. The terrorists are praised, and are often acknowledged as members of an ideological-terrorist organization only after the terrorist attack is carried out.

25. Many of the terrorists, such as Abd al-Rahman al-Shaludi, were already affiliated with terrorist organizations before carrying out their attack. In these cases, the terrorist organization with which the terrorist is affiliated claims responsibility for the attack only after it is carried out. This is reflected, *inter alia*, in: eulogies by the terror organization in honor of the perpetrator; statements and posters distributed by the organization affirming the terrorist's affiliation; funerals where the organization's identifying marks such as flags and symbols are raised and calls are sounded, stressing the terrorist's organizational affiliation; and mourning tents, above which the organization's flags are displayed. The organizational affiliation of such a terrorist is obvious to Palestinian society. These characteristics, highlighting the organizational affiliation of the terrorist and the organization's responsibility for the attack, leave little room for doubt as to which terror group is responsible for the attack in such cases.

D. Details of The Terrorist Car Ramming Attack: Description and Characteristics of the Incident

26. As briefly described above, on October 22, 2014, shortly before 6:00 pm, a Volkswagen car (the vehicle used in the attack is registered to Silwan resident Inas al-Shaludi, mother of Abd al-Rahman, who carried out the attack) drove recklessly from the direction of northern Jerusalem to the light railway station at Ammunition Hill. The vehicle drove past the light rail tracks, where cars are forbidden, rammed into the waiting platform and ran over a

www.jpost.com/Arab-Israeli-Conflict/Social-media-playing-central-role-in-Palestinian-incitement-during-terror-wave-426090

number of people, who were either waiting for the train, or alighting from the train that had just arrived at the station. The car eventually stopped on the station's platform. The attack claimed the lives of two people, including baby girl Chaya Zissel Braun, whose parents and grandparents are the plaintiffs in this lawsuit. Seven other people were injured in the attack.

27. Detailed accounts by eyewitnesses who provided statements to the police portray a clear image of the attack:⁶ the driver of the train that arrived at the station (some of whose passengers were among the victims of the attack) described what he had seen: the vehicle was driving on the wrong lane, and then it started to speed up. It ran over the people at the station and continued driving. Only when the car driver drove in the other direction, the train driver realized that **he had done it on purpose in order to hit the people on the sidewalk.**⁷ (my emphasis. A.S).

28. A passenger, who had just disembarked from the train, saw the Volkswagen driving fast between the train and the station where people were standing. The car missed him by one meter, hit a woman, and then bumped into the sidewalk.⁸ Another witness to the attack said that the baby and another child were hit, and that he saw them lying on the floor.⁹ Another passenger reported seeing the woman getting hit "and then I also saw the baby, whose body was tossed in the air, landing on the ground ten meters away. Then the parents took the baby and came next to me."¹⁰

⁶ The description of the attack was compiled out of statements given to the police by witnesses, who were at the scene when the attack took place.

⁷ Mu'tasim Rashid, the railway driver, who was investigated immediately after the attack. Police File no. 466226/2014.

⁸ Oryan Dayan, who was questioned immediately after the attack. Police File no. 466226/2014.

⁹ Testimony of Oren Amar on October 22, 2014 (the day the attack took place). Police File no. 466226/2014.

¹⁰ Testimony of Bella Rafael, was given on November 20, 2014, police file no. 466226/2014.

29. Other passengers, who also witnessed the attack, gave identical accounts, including reckless driving on a lane where cars are prohibited and the fatal hit to baby Chaya Zissel Braun.¹¹ The infant died at the hospital shortly after arriving in the emergency room. Particularly shocking is the testimony of the baby's mother, Chana Braun (one of the plaintiffs in this case), who saw her baby girl murdered before her eyes: "Today, at around 5:45 pm, I took the light rail with my husband and my three-month-old daughter... We got off at the Ammunition Hill station. We got off in the direction of the sidewalk and then we walked on the sidewalk, when suddenly a car arrived... It was a silver-colored car, a compact, low car... My husband was walking ahead pushing the carriage with the baby. The car hit our carriage, and I remember that it first hit another child, about 16-years-old. My daughter was tossed out of the carriage and was seriously injured. My husband suffered a leg injury." [The police interrogator wrote that the investigation was interrupted because of the psychological state of Ms. Braun].

30. Terrorist Abd al-Rahman al-Shaludi, who exited the ramming car through the window, fled the scene running. A number of people started chasing him and called him to stop. Having failed to comply and continuing his attempt to escape, he was shot at by one of the security men who was chasing him.¹² The terrorist was evacuated to a hospital in critical condition and died of his wounds several hours later.

31. An examination of the course of events, as depicted in the eyewitness accounts, indicates that the car ramming was intentional, with a malicious intent to harm

¹¹ Testimony of railway passenger Dvir Swissa, given immediately after the attack. Police File no. 466226/2014.

¹² Ronen Mizrahi, an investigator in the Israel Police, who was on board the light railway when the attack occurred, described the course of events as follows: He ran after the fleeing terrorist, calling him to stop. Seeing that there were no people in the line of fire, he fired once or twice in the air. The suspect continued to run. He shouted for him again to stop, and when he continued to run, he shot four or five bullets at him and he fell on the grass. Mizrahi searched the terrorist and found his identity card. The testimony was given on the day of the attack - Police File no. 466226/2014.

innocent people using the light railway services who were unfortunate to be on the station's platform at that moment.¹³ The terrorist, Abd al-Rahman al-Shaludi, carried out the attack with malicious intent, murdering civilians, injuring innocent passersby, destroying and damaging property, and finally he even tried to flee the scene. The car ramming and the murder were referred to as an attack - not an accident - by Hamas¹⁴ and by other organizations that praised the terrorist in the death notices they published, in their speeches and in other statements. Unlike other organizations, Hamas recognized Abd al-Rahman al-Shaludi as its operative (for more details on this, see a separate chapter later in this Expert Opinion).

32. Based on the above eyewitnesses accounts; the manner in which the terrorist Abd al-Rahman al-Shaludi conducted himself before, during and after the vehicular attack; and the fact that the different terrorist organizations and the Palestinian Authority

¹³ For example, when an eyewitness was asked if her impression was that the vehicular attack was intentional, she said: "Of course; he was driving so fast and rammed into the platform where people were standing, and hit the railway. He was speeding up and then tried to escape. I even saw him directing the car toward the people. He was not driving straight, but toward the people" (testimony of light railway passenger, Orit Asulin). Another witness said: "The car was driving recklessly at a place where cars have no reason to be; even if the driver loses control, there is no reason that he should drive there." He hit an old woman, went on and hit a pole and stopped. Then, he got off the car and fled". The witness chased him and noticed that two others were also chasing him. They shot at him and he fell down. "I have been a driver for 40 years," he said "and I immediately realized that he was not a drunk driver because he was driving fast in a narrow place where large vehicles cannot drive. He was driving like a professional, because an average driver cannot pass such a narrow spot in such speed. Therefore, I believe he wanted to hit people, especially in light of the fact that in the place where he was driving there was a large number of pedestrians, and it was not meant for any car to be there." (Testimony of Eli Dayan, who was with his son on board the railway that arrived to the station. He got off the railway at the station where the attack took place). Another passenger said that the driver drove slowly until he got on the sidewalk and then sped up, ran over people and tried to flee. The witness immediately realized that it was a terrorist attack (testimony of Jason Melamed). Other eyewitnesses reported their clear impression of the malicious intent behind the vehicular attack against the people at the station, perpetrated by the terrorist who was driving the Volkswagen. All the testimonies above can be found in Police File no. 466226/2014.

¹⁴ See for example a review issued by the Middle East Media Research Institute (MEMRI) on November 19, 2014: " Hamas Praises Recent Terror attacks in Israel and Calls for Escalation and Launch of New Intifada."

www.memri.org/report/en/0/0/0/0/0/8249.htm

spokespeople referred to the car-ramming and murder as an intentional attack (not an accident), it is clear and I conclude that the Terrorist Car Ramming on October 22, 2014, was a terrorist attack, maliciously and intentionally carried out by the terrorist Abd al-Rahman al-Shaludi, who was acknowledged by Hamas as a Hamas operative at the time of the attack.

E. Profile of the terrorist Abd al-Rahman Idris Muhammad-Yahya al-Shaludi (aka Aboud)¹⁵

33. Terrorist Abd al-Rahman Idris Muhammad-Yahya al-Shaludi: born in 1993, a resident of Silwan, Jerusalem.¹⁶ He was posthumously dubbed "The Maqdisi Shahid",¹⁷ which means "The Jerusalemite Martyr." He attended the Shari'a school "Al-Aqsa," which is an Islamic religious school. Abd al-Rahman al-Shaludi was the nephew of Muhyi al-Din al-Sharif, one of the senior leaders of Hamas's operational-terrorist wing in the West Bank in the 1990's. To this day, Muhyi al-Din al-Sharif is considered an admired figure and a role model among Hamas terrorists and supporters.¹⁸ As we shall see later in this Expert Opinion, Muhyi

¹⁵ The nickname Aboud appeared in the detailed Indictment, *State of Israel vs. Al-Shaludi*, the Jerusalem District Court, Criminal File - 47016-09-12.

¹⁶ Silwan (Arabic: سلوان) or Kfar Ha-Shiloah, is a neighborhood located in South-East Jerusalem on a slope descending southward from the Mount of Olives, and on both sides of the Kidron Valley, near an area called the Holy Basin.

¹⁷ This nickname of Abd al-Rahman al-Shaludi, as well as his full name and other personal information, appeared on the "Al-Quds city" website (Al-Quds refers to "The City of Jerusalem"). The website, according to its homepage (<http://www.alquds-online.org/org/index.php?s=home>), belongs to the Al-Quds (Jerusalem) International Institution, an Arab Islamic organization whose main goal is the promotion of the Arab identity of Jerusalem. It enjoys the support of Hamas senior officials who participate in its conferences, such as Hamas Prime Minister Isma'il Haniya, Hamas leader and head of its Political Bureau, Khaled Mish'al, and Hamas senior official in the Gaza Strip, Mahmud al-Zahhar. See article by the Meir Amit Intelligence and Terrorism Information Center: www.terrorism-info.org.il/data/pdf/PDF_11_079_1.pdf.

<http://www.alquds-online.org/items/83>

¹⁸ Considering the central role of Muhyi al-Din al-Sharif and his impact on shaping the character of the terrorist, al-Shaludi, following is a brief profile of this senior Hamas terrorist: Muhyi al-Din Ribhi Said al-Sharif was born in 1966 and lived in Beit Hanina, Jerusalem. He was one of the heads of Hamas's operational-terrorist wing in the West Bank, the Izz al-Din al-Qassam Brigades. He studied electrical engineering at the Al-Quds University in Jerusalem, which qualified him to be a Hamas explosives expert. He joined the organization already during his studies. Due to his activities

al-Din al-Sharif had great influence on Abd al-Rahman al-Shaludi since he was a young boy. In addition to his activity as a terrorist operative with a nationalist Islamic ideology, Abd al-Rahman al-Shaludi was also involved in criminal activities. For instance, he was arrested in March 2014 on suspicion of stealing the very same car he had informed the police was stolen from him.¹⁹ He was arrested again in August 2014 for disobeying traffic rules²⁰ while driving the same car that he later used to carry out the Terrorist Car Ramming Attack. In connection with that arrest, he was summoned to court in November 2014, but he never showed up, as he had already been killed three weeks earlier while carrying out the Terrorist Car Ramming Attack.

34. Through the years, Abd al-Rahman al-Shaludi took part in activities that had terrorist, nationalistic characteristics, such as:

with the organization, he was first arrested by Israel in 1991 (sentenced to 20 months in prison) and again in 1993 (sentenced to a year and a half in prison). Upon his release, he joined the head of the Hamas operational-terrorist wing at that time, Yahya Ayyash, who was famous for his technical abilities to produce explosives and explosive belts and who was dubbed "Engineer Number 1". Later, after Ayyash was killed by Israel (in January 1996), Muhyi al-Din al-Sharif replaced him as head of Hamas's explosive manufacturing system in the West Bank, and was dubbed "Engineer Number 2". Muhyi al-Din al-Sharif was responsible for many terrorist operations, the murder of dozens of innocent people and the injury of hundreds. He was wanted by the Israeli security forces during the years in which he was active, until he was killed in March 1998 when an improvised explosive device he was making in a garage in Ramallah exploded. The explosive device was designated for a car bomb that was supposed to explode in Jerusalem. As stated above, Muhyi al-Din al-Sharif, in whose shadow grew the terrorist Abd al-Rahman al-Shaludi, became a revered role model within Hamas and among its supporters.

For further information on Muhyi al-Din al-Sharif and his terrorist activity as a Hamas member, see:

Guy Aviad, Lexicon Hamas (Hebrew), Modan Publishing House, 2014, pp. 332-334; and

Michael Milstein, The Green Revolution: A Social Profile of Hamas (Hebrew), The Moshe Dayan Center for Middle Eastern and African Studies, Tel Aviv University, 2007, p.187.

¹⁹ Police File no. 144773/2014 was opened in March 2014, and Al-Shaludi was interrogated at the Harel-Zion station of the Israel Police.

²⁰ Summoning and Indictment, the *State of Israel vs. Abd al-Rahman al-Shaludi*, dated August 23, 2014, Police File no. 60250267181.

- On September 19, 2012 he was arrested and sentenced to one year and three months as a "security prisoner" for his involvement in such activities as throwing Molotov cocktails at Jews' homes and at police vehicles in Jerusalem; throwing firecrackers and stones at police vehicles; and involvement in security-related disorders.²¹ Two of al-Shaludi's brothers participated in these intensive security activities: Izz al-Din and Abdullah.²² In its verdict on the appeal filed by Al-Shaludi's accomplices against their prison sentences, the Israeli Supreme Court ruled that these were **ideological** (my emphasis. A.S) crimes, and those convicted were classified as **security prisoners** (my emphasis. A.S).²³
- In February 2014, Abd al-Rahman al-Shaludi was arrested again and was interrogated by the Israel Security Agency (ISA). The court hearing was confidential and he was released on March 3, 2014 without being brought to trial.²⁴

35. Al-Shaludi's security-terrorist past was well known to the security and intelligence services, as can be seen, *inter alia*, in the report of a policeman who was sent to the scene of the attack. According to his testimony, while on his way to the site, the policeman received information that the terrorist had prepared and used explosive devices in the past (for more information, see below).²⁵

F. Hamas's Connection to the Attack

Hamas's Style of Operation Generally

²¹ The essential parts of the Indictment against Abd al-Rahman al-Shaludi are detailed in the Jerusalem District Court's judge decision, dated October 10, 2012, which discussed the extension of Al-Shaludi's remand in the case of the *State of Israel vs. Abd al-Rahman al-Shaludi*, MT (Jerusalem) 47030-09-12. See also the detailed indictment, the *State of Israel vs. Abd al-Rahman al-Shaludi*, the Jerusalem District Court, Criminal File 47016-09-12.

²² Indictment, the *State of Israel vs. al-Shaludi*, dated September 24, 2012, Criminal File 47016-09-12, Charge number 1/A/1.

²³ The verdict was issued by the Supreme Court, convened as the Court of Criminal Appeals, in the appeal of five convicts against the State of Israel before three judges on May 20, 2013, Criminal Appeal 2337/13 and 2954/13.

²⁴ This arrest was mentioned in Arabic websites, such as www.alquds-online.org/items/83 and in an interview with his mother posted on YouTube: www.youtube.com/watch?v=hELsWWOrOhE

²⁵ This information was mentioned in the testimony of a policeman, Sergeant Major Erez Tashtit, an explosive expert in the Jerusalem District Police, in Action Report no. 117, which he filled in on the evening of the attack, having been at the scene and inspected the vehicle used in the attack. Based on the information that he received while on his way to the scene of the attack, it was decided to look for explosive devices in the area and to carry out a thorough search of the vehicle.

36. There are two important points related to the Hamas method of operation which influence my conclusions in this Expert Opinion. The first one concerns the matter of public claims of responsibility for attacks. As we will see below, Hamas has adopted a policy in recent years which is a change from how it operated in the past. Under its new policy, Hamas abstains from issuing official claims of responsibility for terrorist attacks it sponsors, and instead issues statements and "throws hints" that leave little room for doubt as to its connection to the terrorist and responsibility for the attack.

37. The second point relates to the issue of the Hamas membership of the perpetrators of a particular attack. Hamas is a terrorist organization that naturally operates clandestinely and, for understandable reasons, does not readily reveal in public the identity of the terrorists operating in its ranks. The identity of such terrorists and their affiliation to Hamas is usually revealed only after an attack is carried out.

38. **Claim of responsibility:** In the last few years, Hamas has employed a policy of ambiguity regarding its responsibility for the terrorist activity carried out by its operational-terrorist wing, the Izz al-Din al-Qassam Brigades. This is contrary to its previous policy of proudly and openly announcing its terrorist activity. This new policy stems from the fear of the Hamas government (which has been ruling the Gaza Strip since 2007) that every official claim of responsibility for an attack will generate a severe military response by Israel against the organization and its institutions in the Gaza Strip (see, for example, the kidnapping of the three boys in Gush Etzion in June 2014, which caused the armed conflict in Gaza, dubbed Operation Protective Edge).

39. A good example of Hamas employing this policy of delayed acceptance of responsibility for an attack is the March 6, 2008 attack at Jerusalem's Merkaz HaRav yeshiva in which eight students were killed and many others injured. The attack was carried out by Hamas operative Ala'a Hashem Abu Idhim. Hamas did not officially take responsibility for the attack until December 2010, more than two and a half years later. At that time, Hamas's

official statement claiming responsibility for the attack (along with five other attacks) was delivered at a Gaza press conference by Abu Ubeidah, the spokesperson for the al-Qassam Brigades (the Operational Terrorist wing of Hamas).²⁶ As explained on the al-Qassam Brigades' website, Hamas's official acknowledgement of responsibility was delayed because of "the security of the Jihad fighters and the [Jihad] movements." This shows that the timing of Hamas's official announcements of responsibility for terror attacks carried out by its operatives is affected by various considerations, and that operational considerations have greater weight than the organization's need to boast and publicly glorify itself.

40. Hamas continues to openly incite, call for and encourage terrorist attacks targeting civilians in Israel generally (without issuing specific instructions for any attack), including vehicular and stabbing attacks. But, because Israel considers the Hamas government responsible for any terrorist activity carried out by the organization, Hamas avoids publishing official claims of responsibility for specific attacks and is "satisfied" with retroactive statements that the terrorists were members of the Izz al-Din al-Qassam Brigades.

41. Such statements can be found primarily on websites of the organization and its various offshoots; in statements of Hamas leaders who praise the terrorist acts; and at the terrorists' funerals, where the organization's symbols are abundant. An exception to this was

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See

<http://www.alqassam.ps/arabic/%D8%A8%D9%8A%D8%A7%D9%86%D8%A7%D8%AA-%D8%A8%D9%84%D8%A7%D8%BA%D8%A7%D8%AA-%D8%A7%D9%84%D9%82%D8%B3%D8%A7%D9%85/4336/%D8%A7%D9%84%D9%85%D8%A4%D8%AA%D9%85%D8%B1-%D8%A7%D9%84%D8%B5%D8%AD%D9%81%D9%8A-%D9%84%D9%83%D8%AA%D8%A7%D8%A6%D8%A8-%D8%A7%D9%84%D9%82%D8%B3%D8%A7%D9%85-%D8%AD%D9%88%D9%84-%D8%AD%D8%B5%D8%A7%D8%AF-23-%D8%B9%D8%A7%D9%85%D8%A7-%D9%85%D9%86-%D9%85%D8%B3%D9%8A%D8%B1%D8%AA%D9%87%D8%A7-%D8%A7%D9%84%D8%AC%D9%87%D8%A7%D8%AF%D9%8A%D8%A9;>
[https://www.youtube.com/watch?v=AN-dH9aBQ98;](https://www.youtube.com/watch?v=AN-dH9aBQ98)
[https://www.youtube.com/watch?v=UAUUEDTK5Nc.](https://www.youtube.com/watch?v=UAUUEDTK5Nc)

the public unequivocal claim of responsibility by Hamas senior activist Saleh al-Arouri for the June 2014 kidnapping and murder of the three boys, which embarrassed the organization and its leaders and garnered a severe response from Israel, as noted.

42. **Membership in Hamas:** Hamas is a terrorist organization that operates secretly and, since its inception, has attempted to conceal the identity of its operatives. To my knowledge, the organization does not issue "member cards", neither of Hamas nor of its operational-terrorist wing, the Izz al-Din al-Qassam Brigades. In cases where the terrorist has not previously been convicted of membership in Hamas (as in the case of Abd al-Rahman al-Shaludi), the terrorist's organizational affiliation is ascertained through various types of signs: the terrorist's behavior, his ideological tendencies, his family and friends, the way he is seen by others, and mainly the way various Hamas members treat the terrorist after he is publicly identified.

43. It is also important to note that Hamas provides a social services safety net for the terrorists who act on the organization's behalf (whether killed or imprisoned) and their families. This safety net is in the form of charities which are fronts for Hamas used to compensate these families in various ways, including through one time grants, provision of money or basic products for Muslim holidays, payment of educational expenses for family members and, of course, financial compensation for the destruction of the family home in the event the home was demolished in the wake of the terror attack. Based on my familiarity with hundreds of similar situations, it is likely that the al-Shaludi family received or will receive such support from the various Hamas institutions.²⁷

²⁷ Similarly, Iran has promised concrete support directly to the families of any terrorists from the current renewed terror wave that began in 2015, where a child was killed in a terror operation or the family homes was destroyed as a result. See Meir Amit Intelligence and Terrorism Information Center Report titled: *Encouragement for the Palestinian Terrorist Campaign through Financial Support*, available at <http://www.terrorism-info.org.il/en/article/20969>.

Hamas's Responsibility For This Terrorist Car Ramming Attack

44. Abd al-Rahman al-Shaludi's profile above reveals that he was a young man, resident of Silwan, a village with a solid Hamas infrastructure.²⁸ He had a religious Islamic background and attended a religious school. He grew up in a family with a close affinity to Hamas, and since early childhood, had been involved in nationalist activity with terrorist characteristics. He was arrested and interrogated more than once and was even held accountable for his activity. At least two of the terrorist's brothers were his accomplices in this terrorist activity. One of the terrorist's brothers, Izz al-Din Idris al-Shaludi, born in 1998, also attended the "Al-Aqsa" religious high school and stood trial in 2012 along with his other brother for his involvement in a security-related activity in Silwan. The brother was even interrogated on suspicion of involvement in the Terrorist Car Ramming Attack at issue herein. Abdullah, another one of the terrorist's brothers, also took part in throwing Molotov cocktails in Silwan in 2012.

45. The close affinity of terrorist Abd al-Rahman al-Shaludi to Hamas is anchored in his biographical-family background. As noted, the maternal uncle of Abd al-Rahman al-Shaludi was Muhyi al-Din al-Sharif, one of the former heads of Hamas's operational-terrorist wing who is considered a role model by Hamas and its members (see his profile above).

²⁸ Extensive Hamas activity took place (and continues to take place) in the village of Silwan. The widespread influence of Hamas in the village stems, among other things, from the composition of the village population, which consists of many Hebronite families who have moved there from Hebron during the last decades. Hebron, whose population is comprised mostly of religious Muslims, is one of Hamas's strongholds in the West Bank. At the beginning of the 2000s, a cell of Silwan Hamas members carried out grave attacks in Israel that caused the death of dozens of people, including the Café Moment bombing in Jerusalem, the Sheffield Club bombing in Rishon LeZion and the bombing at a Hebrew University cafeteria in Jerusalem. There are quite a few cases of Hamas operatives from Silwan who have been arrested by Israeli security forces (for instance: Muhammad Abu Tayeh, against whom an indictment was filed in February 2015 <http://www.inn.co.il/News/News.aspx/293090>). Hamas institutions in Silwan were also closed down in January 2012 (the institutions were closed based on information that the Israeli police had regarding the clandestine use of these institutions by Hamas <http://www.inn.co.il/News/News.aspx/232585>).

46. The terrorist's childhood was overshadowed by his uncle's activity as al-Shaludi's mother testified in an interview with the "Filastin" website on the 19th anniversary of the death of her brother, Muhyi al-Din al-Sharif. She said that the saying "two-thirds of the child belong to his maternal uncle" was absolutely true with regard to her son, who had been killed a few months earlier. She said his childhood was full of resistance activities against Israel, as he experienced searches by Israeli security forces for his wanted uncle, Al-Sharif, in his grandfather's house where he also lived.

47. According to al-Shaludi's mother, police patrols would stop al-Shaludi often. He would agitate patrol soldiers each time he met them and harass Jewish children who were playing next to his home. He was among the first residents of the neighborhood to participate in clashes and throw Molotov cocktails. Al-Shaludi's mother said that he was even wanted by the security forces for approximately three months.²⁹

48. For its part, Hamas publicly disclosed al-Shaludi's affiliation with Hamas one year prior to the Terrorist Car Ramming Attack. Upon Abd al-Rahman al-Shaludi's release from prison in 2013, the Islamic Movement hung a large greeting banner with al-Shaludi's picture next to the picture of Hamas founder, Sheikh Ahmad Yassin and a picture of Al-Shaludi's uncle, the Hamas terrorist Muhyi al-Din al-Sharif (known as "Hamas Engineer No.

²⁹ Abd al-Rahman al-Shaludi's failure to report to the police was mentioned by a judge in one of the proceedings against al-Shaludi as one of the reasons for that judge's approval of the August 2012 arrest warrant until the end of those proceedings - *The State of Israel vs. Abd al-Rahman al-Shaludi*, MT (Jerusalem) 47030-09-12. The interview given by Abd al-Rahman al-Shaludi's mother to the Filastin website on the 19th anniversary of the death of her brother, Muhyi al-Din al-Sharif, was published on this website:

<http://felesteen.ps/details/news/136401/%D8%B9%D8%A8%D8%AF-%D8%A7%D9%84%D8%B1%D8%AD%D9%85%D9%86-%D8%A7%D9%84%D8%B4%D9%84%D9%88%D8%AF%D9%8A-%D8%B9%D9%84%D9%89-%D8%AE%D8%B7%D9%89-%D8%AE%D8%A7%D9%84%D9%87-%D8%B3%D8%A7%D8%B1-%D9%88%D8%AF%D9%8E%D9%87%D9%8E%D8%B3.html>;

2"). The caption below this picture, which was published on a website following al-Shaludi's death, read: **The latter was affiliated with the Hamas organization** (my emphasis. A.S).³⁰

49. The Islamist ideology behind the Terrorist Car Ramming Attack and al-Shaludi's allegiance to Hamas are evident from his Facebook account, where he uploaded videos of the Izz al-Din al-Qassam Brigades and speeches of Mahmud al-Zahhar, a Gaza-based Hamas senior official. On September 19, 2014, he uploaded an Al-Jazeera TV video about ISIS.³¹ His last Facebook activity was on October 11, 2014, when he shared a video of Izz al-Din al-Qassam Brigades' training exercises. On October 10, 2014, he posted a picture of the Al-Aqsa Mosque in flames with the following caption: "Al-Aqsa is in Danger... Al-Aqsa is in Danger... Oh, Nation of Muhammad!". He added his own caption, reading: "Set out to Al-Aqsa! Good morning."

50. I have already referenced the fact that Hamas and its leaders encouraged vehicular and stabbing attacks, while claiming that the Al-Aqsa Mosque is in danger and that the believers must defend it through such attacks. After al-Shaludi's death, Hamas issued a death notice, reading: "The Islamic Resistance Movement mourns the death of **its son** (my emphasis. A.S), the martyr, the hero Abd al-Rahman Idris al-Shaludi, 23, who carried out the daring action in Jerusalem and ran over nine settlers in the Sheikh Jarrah neighborhood. That is Jihad... victory or martyrdom." (PALDF, October 23, 2014).

³⁰ The picture and the explanations appeared on a blog, self-proclaimed to be Hamas-affiliated. Its address is a combination of the name of Hamas founder Yassin and the name of the Hamas terror wing, the Izz al-Din al-Qassam Brigades: http://yaseenizeddeen.blogspot.co.il/2014/10/blog-post_79.html

³¹ The Meir Amit Intelligence and Terrorism Information Center examined Al-Shaludi's Facebook page and published the results in an article concerning the attack, which is the focus of this lawsuit:

www.terrorism-info.org.il/he/articleprint.aspx?id=20722

51. Various organizations issued death notices honoring Abd al-Rahman al-Shaludi, but only Hamas dubbed him the "Movement's son"³². Hamas's use of the term "son" on Hamas posters, is significant in al-Shaludi's case and shows that Hamas recognized al-Shaludi as a Hamas operative. Based on my extensive professional experience in this area (including, among other things, review of tens of interrogations of Hamas terrorists which also dealt with Hamas recruitment practices over the years), joining Hamas as an activist (or member of the movement) involves being recruited to the Hamas ranks by someone who is authorized by the organization to bring in new members. The recruiter already serves as a Hamas activist and recruits new members to perform various tasks in the service of Hamas (such as operational terror activities or other activities that serve the organization's goals). Those who are recruited to the organization, like al-Shaludi, are generally young people who identify ideologically with Hamas and are willing to serve the organization. Thus, the use of the term "son of the movement" by Hamas in reference to al-Shaludi constitutes a public acknowledgement, together with other characteristics mentioned in this report, that al-Shaludi was a Hamas operative when he carried out the Terrorist Car Ramming Attack.

52. Hamas-affiliated Facebook pages³³ posted a picture of Abd al-Rahman al-Shaludi, with Muhyi al-Din al-Sharif's picture in the background. As depicted in the picture, the Terrorist Car Ramming Attack was carried out in revenge for the death of a four-year-old girl, killed in a car accident the day before, with the lower inscription reading: "The hero Abd al-Rahman al-Shaludi, who carried out the vehicular attack against the settlers in the city of

³² The Hamas death notice was published on the Hamas-affiliated website www.paldf.net: <https://www.paldf.net/forum/showthread.php?t=1157725>. Read more about the website's affiliation with Hamas in an article published by the Meir Amit Intelligence and Terrorism Information Center, on July 20, 2009: "Terrorism and the media: Hamas gives priority and invests resources in rehabilitating, reinforcing and expanding its media empire, damaged during Operation Cast Lead". http://www.terrorism-info.org.il/data/pdf/PDF_09_192_2.pdf

³³ Among others, on the Hamas affiliated PALDF website, on October 23, 2014.

Jerusalem." Other postings concerning the Car Ramming Attack published in the Hamas forum read: "The flames of resistance³⁴ will burn the pillar of your lies."³⁵

53. Hamas and its leadership praised the attack and other attacks that occurred in Jerusalem at about the same time.³⁶ This is compatible with the method of operation described above, according to which Hamas calls for carrying out vehicular and stabbing attacks without issuing specific instructions to operatives, and consistent with that call, Hamas operatives carry out such attacks.

54. Husam Badran, a Hamas senior official, praised the Terrorist Car Ramming Attack and its perpetrator, saying: "The hero Al-Shaludi followed the path of his uncle, the martyred commander Muhyi al-Din al-Sharif." Badran even incited the public to carry out more attacks, saying that the Palestinian people in the occupied West Bank should take action "and use new methods in their resistance to the occupation, both in organized activities and as an individual initiative." Hamas praised "**its son** (my emphasis. A.S) the hero martyr Abd al-Rahman Idris al-Shaludi."³⁷

³⁴ The word "resistance" is sometimes used as a short reference to the Islamic Resistance Movement – which is Hamas.

³⁵ See in a review published by the Meir Amit Intelligence and Terrorism Information Center concerning the attack, which is the focus of this lawsuit, on October 23, 2014:

www.terrorism-info.org.il/he/articleprint.aspx?id=20722

³⁶ Read in Review No. 5886 of the Middle East Media Research Institute (MEMRI), from the end of 2014, concerning the way Hamas sees the escalation in terrorist attacks. The review is titled:

Hamas Praises Recent Terror Attacks In Israel, Calls For Escalation And Launch Of New Intifada, Threatens: 'The Palestinian Volcano Will... Erupt In Occupation's Face'.

http://www.memri.org/report/en/0/0/0/0/0/8249.htm#_ednref2

³⁷ Praise of this attack and its perpetrator, as well as the statement that Al-Shaludi was a Hamas member, appeared on the website of the Popular Resistance Movement, an umbrella organization of various organizations that consider themselves its members: the Popular Resistance Movement in Palestine, the Islamic Resistance Movement – Hamas, and the Palestinian Freedom Movement.

55. The Israeli media also quoted Hamas spokesman Husam Badran's statement to the Hamas television station in Gaza: "This is a natural response to the crimes of the occupation and to the Jews' invasion of our land, particularly of the Al-Aqsa Mosque."³⁸

56. During the funeral of Abd al-Rahman al-Shaludi, mourners carried Hamas-affiliated flags, and the terrorist's body, which had been wrapped in white shrouds before, was rewrapped in green shrouds for the funeral, a symbol of al-Shaludi's affiliation with Hamas.³⁹ During the symbolic funeral⁴⁰ held for Abd al-Rahman al-Shaludi in his hometown Silwan, the mourners carried a coffin wrapped in a green cloth and called for kidnapping Israelis.⁴¹

<http://www.moqawmh.ps/%D8%AE%D8%A8%D8%B1/%D9%81%D8%B5%D8%A7%D8%A6%D9%84-%D8%A7%D9%84%D9%85%D9%82%D8%A7%D9%88%D9%85%D8%A9-%D8%AA%D8%B4%D9%8A%D8%AF-%D9%88%D8%AA%D8%A8%D8%A7%D8%B1%D9%83-%D8%B9%D9%85%D9%84%D9%8A%D8%A9-%D8%A7%D9%84%D8%AF%D9%87%D8%B3-%D8%A8%D8%A7%D9%84%D9%82%D8%AF%D8%B3-%D9%88%D8%AA%D9%86%D8%B9%D9%89-%D9%85%D9%86%D9%81%D8%B0%D9%87%D8%A7-%D8%A7%D8%A8%D9%86-%D8%AD%D9%85%D8%A7%D8%B3-%D8%B9%D8%A8%D8%AF-%D8%A7%D9%84%D8%B1%D8%AD%D9%85%D9%86-%D8%A7%D9%84%D8%B4%D9%84%D9%88%D8%AF%D9%8A/24811>

³⁸ Goodenough, Patrick, State Dep't Calls for Restraint on 'All Sides' After American Baby Killed in Jerusalem Attack, CNS News, 10/23/14, available at: <http://www.cnsnews.com/news/article/patrick-goodenough/state-dep-t-calls-restraint-all-sides-after-american-baby-killed>.

³⁹ A picture of Al-Shaludi's body wrapped in green shrouds, can be seen on this website: <http://nawa.ps/arabic/?Action=Details&ID=14239>

The funeral of Al-Shaludi, in which Hamas-affiliated flags, along with yellow flags, were raised, and riots and disorders took place, is depicted in a YouTube video:

www.youtube.com/watch?v=reT02C3br5Y

⁴⁰ It is a common practice for terrorists to be given a symbolic funeral prior to their real funeral for different reasons as a sign of recognition and honor. A video shot at the symbolic funeral was posted on the Internet:

<https://www.youtube.com/watch?v=tFOzIMt1s6k>

⁴¹ The picture appeared in a weekly review issued by the Meir Amit Intelligence and Terrorism Information Center. The review referred to several issues, including the events that followed the vehicular attack. According to this review of the Meir Amit Intelligence and Terrorism

After his death, the family's house was decorated with Hamas flags (green flags with Quranic verses).⁴²

57. According to Internet reports, Hamas made an official statement that Al-Shaludi was a Hamas operative, but did not claim responsibility for the Terrorist Car Ramming Attack.⁴³ This is consistent with the method of operation I have described above, by which Hamas incites and encourages its operatives to carry out attacks without issuing specific instructions, is happy to claim terrorist activity after it occurs, but avoids any explicit statement of responsibility in order to avoid a severe Israeli response especially in Gaza.

58. However, it is clear from al-Shaludi's conduct prior to the attacks and Hamas's conduct after the attack that al-Shaludi was acting as a Hamas operative and pursuant to the calls to action by the organization's leaders when he carried out the attack. Al-Shaludi was from a Hamas family and a village with an extensive Hamas infrastructure. He clearly aligned himself with Hamas ideology prior to the attack. Hamas recognized him as an operative prior to the attack. Furthermore, al-Shaludi's Facebook postings prior to the attack demonstrated that he was acting in furtherance of the Hamas calls to action to save al-Aqsa. In addition, the Israeli security services recognized al-Shaludi as a Hamas operative prior to the attack and questioned him about his terrorist activities in the months preceding the attack. The terrorist's mother said that in his interrogation by the Israel Security Agency (ISA) he had been asked

Information Center, an institution that sometimes receives information from security sources, including the Israel Security Agency (ISA), Al-Shaludi was a Hamas operative:

http://www.terrorism-info.org.il/Data/articles/Art_20724/E_179_14_1108503703.pdf

⁴² The picture depicts the house, with two banners mourning the death of Abd al-Rahman al-Shaludi, along with a large number of green flags, some of which carry inscriptions praising Allah – green flags and praise of Allah both being characteristics of the Hamas flag.

<http://rotter.net/forum/scoops1/149750.shtml#28>

⁴³ <http://www.vetogate.com/1292077>

about his Hamas membership based on secret information that the ISA had at the time of the interrogation.⁴⁴

59. After the attack, Hamas praised the attack and al-Shaludi, publicly stating that he was a Hamas operative (referring to him as “son” of the Hamas movement). Hamas symbols were also pervasive at al-Shaludi’s funeral and in posters praising al-Shaludi.

60. In addition, the American media quoted Israeli officials who recognized Al-Shaludi as a Hamas operative.⁴⁵ Thus, there can be no doubt that this was a Hamas attack, carried out by a Hamas operative.

G. Summary and Conclusions

61. Based on all of the material reviewed and discussed herein concerning the murder of baby Chaya Zissel Braun on October 22, 2014 at the Ammunition Hill light rail station in Jerusalem, it is my expert opinion that:

- **The Terrorist Car Ramming Attack** described above, in which Chaya Zissel Braun and another woman were killed and seven people were wounded, **was a terrorist attack planned and carried out deliberately as part of the wave of terror at the end of 2014** - a wave of terror characterized by vehicular and stabbing attacks by individual terrorists or pairs of terrorists. I assert this, based on numerous testimonies of eyewitnesses who were at the scene of the attack and described the deliberate behavior of the terrorist at the time of the attack and following it. I also base my conclusion on the fact that terrorist organizations, particularly Hamas, have publicly stated that this Car Ramming Attack was a terrorist attack, which was a part of the wave of terror that they were encouraging.
- **The terrorist who carried out the Terrorist Car Ramming Attack**, Abd al-Rahman al-Shaludi was an ideological, Islamist terrorist operative, who had been arrested, interrogated and imprisoned as a result of his terrorist activity. The terrorist was from a Hamas family, was himself ideologically identified and **was publicly recognized by Hamas as a Hamas operative both before and after the attack**. His organizational affiliation was posthumously emphasized, both in explicit statements by Hamas

⁴⁴ http://www.alhaya.ps/arch_page.php?nid=246405

⁴⁵ See publication in CNSNEWS: <http://www.cnsnews.com/news/article/patrick-goodenough/state-dep-t-calls-restraint-all-sides-after-american-baby-killed>

officials and in pictures, posters and identifying marks that were present at his real and symbolic funerals and in the mourning rituals which followed.

- **Hamas** openly and publicly stood behind the attack and the terrorist. Official spokespeople of Hamas called for carrying out further, similar attacks. They admitted that the Terrorist Car Ramming Attack was an intentional attack which aimed to injure Israelis and praised it. These official Hamas spokespeople also declared that the terrorist was a Hamas operative (referring to him as a "son": of Hamas) and effectively claimed responsibility for this attack although they refrained from explicitly saying so in fear of a harsh Israeli reaction. The Israeli security services have also indicated that Hamas was responsible for the attack.

62. **In conclusion, it is my expert opinion that Chaya Zissel Braun was a victim of a Hamas terrorist attack.**

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Arieh Dan Spitz

May 23, 2016

Date

EXHIBIT A

Curriculum Vitae

Arieh Dan Spitzten

PROFESSIONAL BACKGROUND

1. My name is Arieh Dan Spitzten. My areas of expertise are: The Palestinian Authority; Palestinian society – political, social and economic research of Palestinian society; the methods of operation of the Palestinian Authority and the various powerbrokers within the Palestinian Authority; the methods of operation and modes of conduct of Palestinian Islamic terror groups, such as Hamas and the Palestine Islamic Jihad, with emphasis on their civilian infrastructures which I have researched (and continue to research) over many years. I have 40 years of professional, practical, theoretical and academic experience in these areas.

2. Until January 1, 2009, I served as the Department Head for Palestinian Affairs and as Advisor for Palestinian Affairs at the office of the Coordinator of Government Activities in the Territories at a rank and position of Colonel.

At the present time I work as a consultant on the Middle East, with an emphasis on Palestinian issues, for private and institutional organizations and research institutes (including academic institutes).

3. In 1976 I graduated with honors from the Department of the History of Islamic Countries and the Department of the History of the Jewish People, both within Jerusalem's Hebrew University.

4. Also in 1976 I established the Research Section of the Advisor for Arab Issues in the Military Government in the West Bank (later to be known as the Civil Administration). I served as head of the Research Section for two years. I was chosen for this position based on my academic achievements by Professors Amnon Cohen and Menahem Milson, both of whom served at one time or another as Arab Affairs Advisor in the West Bank.

5. From 1978 to 1981 I served as assistant to Professor Menahem Milson of the Department for Arab Language and Literature and was employed as a research-assistant in the Van Leer Jerusalem Institute. At Van Leer I dealt with issues concerning the integration of the Arab population into all levels of Israeli society. At the same time I prepared a scientific research paper about Jerusalem's economy in the 18th century which was based on original documents in Turkish and Arabic that were discovered in the archives of Jerusalem's Muslim Court. In a related effort, I also completed a scientific article - published in the prestigious "Cathedra" magazine - about Jewish endowments in Jerusalem at the end of the 18th Century.

6. From 1981 to 1993 I was Head of the Research Section in the office of the Advisor for Arab Affairs in the West Bank, as well as Deputy Advisor. In these capacities I was involved in researching the socio-economic and political situation of the Palestinian population, while focusing on political and social trends and the prevailing atmosphere. In addition, I prepared – and assisted my subordinates in preparing - hundreds of research papers, staff papers, articles, anthologies, and studies in civilian matters. These were used by the decision-making echelons at the Ministry of Defense, the office of the Coordinator of Government Activities in the Territories, and at the field level of the Central Command.

Almost all of the papers from that period, as well as hundreds of papers written at a later time, were given a security classification. Therefore, they could not be publicly published.

7. Between the years 1993-1996 I participated in the negotiations for the Oslo Accords and was a member of the teams that negotiated the transfer of civilian powers and responsibilities from the Civil Administration to the Palestinian Authority.

8. From 1996 to 1998 I served as Supervisor for civilian coordination and liaison in the West Bank vis-à-vis the Palestinian Authority's Ministry of Civil Affairs, and other civilian offices.

9. In 1998 I was appointed by the former Chief of Staff of the Israel Defense Forces, Shaul Mofaz, and the Minister of Defense, Yitzhak Mordechai, to serve as Department Head for Palestinian Affairs in the West Bank. I continued in this position until the year 2000, at a rank of Colonel.

10. From 2001-2009 I served as Department Head for Palestinian Affairs in the Administered Territories, and as the Advisor to the Coordinator of Government Activities in the Territories. By virtue of these positions I became the top authority on the socio-economic civilian situation in the West Bank and Gaza and was responsible for writing hundreds of surveys and studies about civilian conditions, political and social trends, the economic atmosphere and its influence, and other diverse civilian issues connected to the civilian Palestinian realm. Naturally, there was some overlap into the military sphere, and to activities connected with terror organizations like Hamas, the Islamic Jihad, the Democratic Front for the Liberation of Palestine, and Global Jihad. In addition, each year I was responsible for writing and updating a comprehensive survey regarding the civilian infrastructure of the Hamas – the *Da'wa*.

11. From January 2009-present, I continue to serve in the Israel Defense Forces reserves where I function from time to time as the emergency Department Head for Palestinian Affairs in the Administered Territories for the Coordinator of Government Activities in the Territories. In that capacity, I continue to be fully up to date in all that occurs in the Palestinian realm, including in all matters relevant to the current terror wave, its different characteristics, the profile of the terrorists who are carrying out attacks and the influence of the Palestinian powerbrokers on this terror wave.

MEDIA

Because of my unique knowledge of the Palestinian realm, and as a respected authority on the subject, I am frequently asked to provide background information to the media. During the last ten years of my IDF service, around once or twice per week, I gave both background and in-depth talks to senior Israeli journalists that deal in Palestinian and military issues, along with foreign correspondents of the international media in Israel. In addition, I am a popular commentator for the Israeli Press, which considers me an expert on everything regarding Palestinian affairs, and am often interviewed on Arabic television stations. I recently appeared on Israel's Channel 1's "A Second Look" on a program titled "The Color of Terror Money," available at the following link: <http://www.iba.org.il/program.aspx?scode=1930171>

ACADEMIC COUNSEL

During my last ten years in the IDF, I was frequently invited to lecture or participate in panels at symposiums, conferences, seminars, and scientific meetings that take place on behalf of universities and research institutes in Israel. I continue to lecture in academic settings on occasion.

APPEARANCE AS AN EXPERT WITNESS IN U.S. COURTS

I have been admitted as an expert witness in three civil terrorism cases in the United States Federal District Court for the Eastern District of New York.

- *Linde et al v. Arab Bank, PLC*, 1:04-cv-02799 (Judge Nina Gershon)
“Mr. Spitzen's professional experience and independent research qualify him to offer the opinions he provides in this case.... Plaintiffs have established Mr. Spitzen's expertise in all of the areas on which he proposes to testify.”
- *Strauss et al v. Credit Lyonnais, S.A.*, 1:06-cv-00702 (Judge Dora Irizarry)
“While there may be legitimate questions as to whether Spitzen's 18–point test demonstrates definitively that the 13 Charities are alter egos under the standard previously discussed (*see supra* § III.B), his methodology is supported sufficiently to be admissible. Spitzen testified that the factors he used in his test are based upon those used by law enforcement authorities and other experts in determining whether an entity is controlled by Hamas, and that his methodology was approved by the Israel Security Agency (“ISA”)...” 2013 WL 751283 (E.D.N.Y.) *23.
- *Gill v. Arab Bank PLC*, 1:11-cv-03706 (Judge Jack Weinstein)
“Mr. Spitzen's eighteen-factor analysis encompasses categories of information generally considered by experts who analyze entities believed to act for terrorist entities. His methodology passes muster under Daubert and Rule 702.” *Gill II*, 2012 WL 5177592, at *6.

I also served as an expert consultant to the plaintiffs’ trial team in *Sokolow, et al. v. Palestine Liberation Organization, et al.*, Case No. 04-0397 (S.D.N.Y.) in which the plaintiffs received a jury award of over \$655 million in February 2015.

APPEARANCE AS AN EXPERT WITNESS IN ISRAELI COURTS

Over the years I have appeared dozens of times in Israeli military and civilian courts, including appearances and/or giving statements to the Supreme Court in a variety of matters that relate to the Palestinian realm. It should be noted that I was a key expert witness in the "Islamic Movement" case in Israel before the District Court in Haifa, in which I gave my opinion regarding the transfer of funds to civilian infrastructures and charitable organizations of the Hamas on behalf of radical foundations abroad, the Al Aqsa Foundation, Interpal, and the Charity Coalition. The Northern District Advocacy believes my testimony to have been crucial to the case.

COUNSEL TO INSTITUTIONAL ORGANIZATIONS

By virtue of my position at the time of my service and today as a private citizen, I advised – and continue to advise - the Operation Coordinator in the Administered Territories and the Research Division of the Intelligence Department. During the last ten years of my service in the IDF, I also

advised the National Defense Council, Israel security agencies, the Mossad, and others regarding the socio-economic political civilian situation in the territories controlled by the Palestinian Authority.

LANGUAGES

I am fluent in Hebrew and Arabic and in English reading and comprehension. I also have an intermediate-level (or better) knowledge of Italian and Turkish.

PUBLICATIONS

Spitzen, Arieh, "The Legal Entity" and Jewish Endowments in Jerusalem at the end of the 19th Century, Cathedra, Volume 19, April 1981, pp. 73-82.

EXHIBIT B

פיגוע הדריסה בגבעת התחמושת/ירושלים מ-22 באוקטובר 2014

בו נרצחה התינוקת חיה זיסל בראון - חוות דעת מומחה

רקע הקשור לגל הטרור שהחל בסוף שנת 2014

ב 22-באוקטובר, 2014 מעט לפני השעה, 18:00 בעת שהרכבת הקלה עמדה בתחנת 'גבעת התחמושת' בירושלים¹ הגיע לעבר התחנה רכב, נהוג בידי המחבל עבד אלרחמן אלשלוודי², מכיוון הגבעה הצרפתית. המחבל הסיט את כלי הרכב מהכביש, עלה על פסי הרכבת הקלה והמשיך לכיוון רציף התחנה שבמקום. נוסעים ירדו מקרונותיה של הרכבת, שעמדה באותה עת בתחנה. רכבו של המחבל פגע, בין היתר, באב ובתינוקת (התינוקת חיה זיסל בראון). רצח תינוקת זאת עומד בבסיסה של תביעה זו שהוגשה על ידי הוריה וסביה. (כתוצאה מפיגוע זה נרצחה אישה נוספת ושבעה אנשים נפצעו. המחבל הדורס, עבד אלרחמן אלשלוודי, נמלט דרך חלון הרכב מהמקום, נורה במהלך מרדף אחריו, ומת מפצעיו בבית החולים, מספר שעות לאחר מכן.³ (תיאור מפורט של הפיגוע יובא בהמשך חוות דעת זו)

פיגוע דריסה זה, הינו חלק מגל טרור השוטף את ישראל החל מקיץ, 2014 ועד סוף 2014. מעשה הדריסה והרצח של עבד אלרחמן אלשלוודי, שימש ועדיין משמש דוגמה ומופת למבצעי פיגועים שבאו אחריו. הן בגל הטרור הנזכר והן בגל הטרור שהתחדש בשליש האחרון של 2015 ונמשך עד לכתיבת שורות אלה. גל הטרור שהחלה תאפיין בעליות ובירידות באינטנסיביות הפיגועים. תחילתו של גל הטרור באוגוסט 2014 כאשר הגורם המשפיע הראשי לכך היה העימות המזוין בעזה בין ישראל והפלסטינים, שזכה לכינוי "צוק איתן" ולצדו, אירועים נוספים.

לקראת אוקטובר 2014 חלה עליה משמעותית באירועי הטרור. וזאת נוכח הסתה הולכת וגוברת מצד גורמים איסלאמיסטיים כגון החמאס והתנועה האסלאמית בישראל, לצד הרשות הפלסטינית. כל אלה האשימו את ישראל בניסיון להפר את הסטטוס קוו בהר הבית, לפגוע במסגדי ההר, לאפשר שם תפילת יהודים ובחזון ארוך טווח - להביא להרס מסגד 'אלאקצא' ולבניית בית מקדש יהודי תחתיו. האשמות אלה נתנו לגל הטרור דחיפה בעלת אופי דתי, כאשר הסיסמה שליוותה את האירועים בשלב זה הייתה "אלאקצא בסכנה !!!" הצורך להגן על קודשי האסלאם הפך להיות העילה המרכזית להצדקת מעשי הטרור הללו.

¹ גבעת התחמושת נמצאת בצפון ירושלים, סמוך לשכונות הגבעה הצרפתית ורמות אשכול ובצמוד לקטע כביש מספר 1 המוביל מהשכונות הצפוניות של ירושלים למרכז העיר. לאורך ציר זה קיימת מסילת ברזל של הרכבת הקלה של ירושלים המחברת את שכונותיה הצפוניות של העיר עם מרכז העיר ומערבה. התחנה בה התרחש הפיגוע נמצאת מול המטה הארצי של משטרת ישראל.

² פרופיל מורחב אודותיו ראה בהמשך חוות דעת זו בפרק נפרד.

³ תיאור הפיגוע על סמך סקירת "מרכז המידע למודיעין ולטרור על שם מאיר עמית" (מל"מ) מיום 23 באוקטובר 2014 שעסקה בפיגוע זה

<http://www.terrorism-info.org.il/he/articleprint.aspx?id=20722>

התיאור נסמך גם על עדויות שנמסרו למשטרה מפי עדים רבים שהיו בזירת הפיגוע בעת התרחשותו. עדים אלה היו, בעיקרם, נוסעי הרכבת הקלה שהמתינו בתחנה לרכבת או ירדו מהרכבת שהגיעה באותו זמן לתחנה, וכן בעלי תפקידים ברכבת ובמשטרה.

המאפיינים הבולטים של גל הטרור הזה מאז תחילת האירועים⁴ הינם פיגועי דקירה ודריסה, כאשר השימוש הינו באמצעים נגישים (סכינים, כלי רכב וכיו"ב) דבר שאינו מצריך היערכות והתארגנות לוגיסטית מקדימה ורחבת היקף, או השגת מקורות מימון גם ההתארגנות הפרסונלית לצורך ביצוע הפיגועים הללו פשוטה יחסית, שכן מדובר בדרך כלל במפגע בודד או בהתארגנות של שני מפגעים, ואין לכן צורך בהקמת תא טרור בעל הירארכיה פיקודית, ובמערך תומך של סייענים.

מעניינת במיוחד לחוות דעת זו, היא הזיקה הארגונית לפיגועי הטרור של הגל הנוכחי, השונה בדינמיקה שלה ובמאפייניה מאלה שהכרנו בעבר. ההסתה לביצוע פיגועים במהלך גל הטרור הנוכחי, מגיעה מטעם גורמי הכוח הפוליטיים, לרבות גורמי הטרור בזירה הפלסטינית. כך נשמעות קריאות שבח ועידוד למפגעים ולדרכם הן מצד גורמי הרשות הפלסטינית וראשיה, והן מטעם החמאס ומנהיגיו, באמצעי התקשורת העומדים לרשותם (רדיו, טלוויזיה, עיתונות, אתרי אינטרנט ובמידה רבה ביותר-הרשתות החברתיות).⁵ הסתה זו יוצרת אווירה המעודדת את מבצעי הפיגועים לקום ולעשות מעשה. שלא בדומה לפיגועי הטרור בעבר, לא מתקיימת הנחיה נקודתית לבצע פיגוע המלווה במערכת אישורים והנחיות, אלא מופנית קריאה גורפת לביצוע פיגועים במאפיינים שנסקרו לעיל, ומושמעים דברי שבח למפגעים שלעיתים, מאומצים לחיק הארגון האידיאולוגי-טרוריסטי לאחר ביצוע פשע הטרור.

לחלק מהמפגעים, כמו לעבד אלרחמן אלשלודי, יש זיקה אירגונית לאירגוני הטרור עוד לפני ביצוע הפיגוע. פיגועים אלה זוכים לאימוץ של אירגוני הטרור לאחר המעשה, בהתאם לזיקתו האירגונית של המחבל. דבר זה בא לידי ביטוי, בין היתר, בהספדים מטעם הארגון למבצע הפיגוע, בהודעות מטעם ארגון הטרור על השתייכותו של המחבל אליו, בכרזות מטעם הארגון המבליטות את שיוכו הארגוני של המחבל, בעריכת

⁴לסקירה מפורטת אודות הפיגועים והנפגעים בשנת 2015 ראה סקירת שירות הביטחון הכללי (שב"כ) של ישראל אודות שנה זאת:

<https://www.shabak.gov.il/publications/study/Pages/ReportY2015.aspx>

⁵ראה למשל מספר דוגמאות מתוך מגוון הסקירות, הניתוחים והכתבות העוסקים בנושא זה:

מאמר העוסק במעורבות הרשתות החברתיות בליבוי האווירה שסביב הפיגועים

<http://www.ad-hoc-news.de/four-dailies-eight-tv-stations-and-scores-of-radio-stations-report-on-the--/de/News/46572647>

וכן: סקירת המכון לחקר תקשורת המזרח התיכון-ממרי על "הרשתות החברתיות כבמה להסתה לפיגועים"

http://www.memri.org/cgi-webaxy/sal/sal.pl?lang=he&ID=875141_memri&act=show&dbid=articles&dataid=3983

וכן: סקירת מרכז המידע למודיעין ולטרור על שם אלוף מאיר עמית (מל"מ) ("הרשתות החברתיות כמקור השראה וחיקוי למבצעי הפיגועים")

<http://www.terrorism-info.org.il/he/article/20950>

הסקירה באנגלית:

http://www.terrorism-info.org.il/Data/articles/Art_20950/E_026_16_2139465664.pdf

וכן: אתר עיתון הג'רוזלם פוסט:

"Photos: Social media and Palestinian incitement during terror wave"

<http://www.jpost.com/Arab-Israeli-Conflict/Social-media-playing-central-role-in-Palestinian-incitement-during-terror-wave-426090>

הלוויות בהן מונפים סממני הארגון כמו דגלים וסמלים ונשמעות קריאות המדגישות את שייכותו הארגונית של המחבל, וכן בפתיחת בתי אבלים מעליהם מונפים דגלי הארגון וכיוב'. לחברה הפלסטינית ולציבור הפלסטיני ברור שיוכו הארגוני של מחבל כזה, ומכלול האמצעים (שנמנו לעיל) המבליטים את השיוך הארגוני של המחבל ואת אחריות הארגון לפיגוע, אינו מותר מקום לספק לגבי הארגון האחראי לפיגועים.

פיגוע הדריסה: פירוט האירוע ומאפייניו

כפי שתואר בקצרה לעיל, ב-22 באוקטובר, 2014, מעט לפני השעה 18:00 הגיע רכב מסוג פולקסוואגן (הרכב הדורס היה רשום על שם אנאס אלשלוודי, מסלואן, אמו של עבד אלרחמן מבצע הפיגוע) בניסיעה פרועה, מכיוון צפון ירושלים אל תחנת הרכבת הקלה ב"גבעת התחמושת". הרכב נכנס למסלול הרכבת, בו אסורה נסיעת כלי רכב אחרים, עלה על רציף ההמתנה ודרס מספר אנשים שהמתינו בתחנה או ירדו מהרכבת שהגיעה לתחנה. הרכב נעצר על רציף התחנה. בפיגוע נהרגו שתיים, בהן התינוקת חיה-זיסל בראון שהוריה וסביה הם התובעים בתביעה זאת, ונפצעו שבעה נוספים.

תיאורים מפורטים של עדי ראייה, אשר מסרו עדותם במשטרה, מעלים תמונה ברורה למדי של מהלך הפיגוע⁶:

נהג הרכבת אשר עצרה בתחנה וממנה ירדו נוסעים שחלקם נפלו קרבן לפיגוע, תיאר את אשר התרחש מול עיניו: הוא ראה את הרכב נוסע במסלול הלא נכון, מתחיל לנסוע, מאיץ ועולה על האנשים בתחנה וממשיך בניסיעה...רק לאחר שנהג הרכב נסע לכיוון השני, הבין מוסר העדות שהנהג עשה זאת בכוונה כדי לפגוע באנשים שהיו על המדרכה⁷ (הדגשה שלי א.ש.). נוסע, שרק ירד מן הרכבת, ראה את רכב הפולקסוואגן נוסע במהירות בין הרכבת לתחנה שבה עמדו אנשים, הרכב חלף במרחק של מטר אחד ממנו, פגע באשה ולאחר מכן נתקע במדרכה⁸. עד נוסף לפיגוע תאר פגיעה בתינוקת ובילדה נוספת, שאותן ראה שוכבות על הרצפה⁹. נוסעת אחרת דיווחה כי ראתה את האשה נפגעת "ולאחר מכן ראיתי גם את התינוקת שעפה כעשרה מטרים וההורים אספו את התינוקת ובאו לידי¹⁰". גם נוסעים נוספים שהיו עדי ראייה לפיגוע מסרו תיאורים זהים הכוללים נהיגה פרועה בנתיב שאינו מורשה לנסיעת מכוניות, ופגיעה אנושה בתינוקת חיה זיסל בראון¹¹. התינוקת נפטרה בבית החולים זמן קצר לאחר הגעתה לחדר המיון. מזעזעת במיוחד היא עדותה של אם התינוקת, חנה בראון (אחת התובעות במשפט זה) אשר ראתה את ביתה התינוקת נרצחת לנגד עיניה: "היום, בסביבות השעה 17:45 היינו ברכבת הקלה, אני, בעלי והבת שלי בת השלושה חודשים... ירדנו בתחנה של גבעת התחמושת. ירדנו לכיוון המדרכה והלכנו על המדרכה, פתאום הגיע רכב... זה היה רכב בצבע כסף, רכב קטן ונמוך.... בעלי הלך קודם עם העגלה ובתוכה התינוקת. הרכב פגע בעגלה שלנו, ולפני כן אני זוכרת שהוא פגע בילדה נוספת, בערך בת 16. הבת שלי עפה מהעגלה ונפצעה קשה. בעלי נפצע ברגל". [החוקר המשטרתי כתב כי החקירה הופסקה בשל מצבה הנפשי של הגברת].

⁶ תיאור הפיגוע הורכב מעדויות שנמסרו למשטרה מפי עדים שהיו בזירת הפיגוע בעת התרחשותו.

⁷ מעתצם רשיד, נהג רכבת, תוחקר מיד לאחר הפיגוע, תיק משטרתי מס' 466226/2014.

⁸ אוריאן דיין, תוחקר מיד לאחר הפיגוע, תיק משטרתי מס' 466226/2014.

⁹ עדותו של אורן עמר, נגבתה ב-22.10.2014, תיק משטרתי מס' 466226/2014.

¹⁰ עדותה של בלה רפאל, נגבתה ב-20.11.2014, תיק משטרתי מס' 466226/2014.

¹¹ עדותו של נוסע הרכבת, דביר סויסה, נגבתה מיד לאחר הפיגוע. תיק משטרתי מס' 466226/2014.

המחבל עבד אלרחמן אלשלוּדי שיצא מחלון הרכב הפוגע, נמלט מהמקום בריצה. מספר אנשים החלו לרדוף אחריו וקראו לו לעצור. משלא נענה והמשיך במנוסתו, נפגע מירי של אחד מאיש הביטחון שרדפו אחריו.¹² המחבל פונה לבית החולים במצב אנוש ומת מספר שעות לאחר מכן.

בדיקת השתלשלות האירוע כפי שבאה לידי ביטוי בתיאוריהם של עדי הראיה שנכחו במקום בעת ביצוע הדריסה, מעלה כי הדריסה בוצעה במתכוון, מתוך כוונת זדון לפגוע באנשים תמימים אשר נזקקו לשירותי הרכבת הקלה, ונקלעו לרוע מזלם, לרציף הרכבת בשעה האמורה¹³. המחבל, עבד אלרחמן אלשלוּדי, ביצע את הפיגוע בזדון תוך רצח אזרחים, פציעת עוברי אורח תמימים, הרס ופגיעה ברכוש, ולבסוף אף ניסה להימלט מהמקום. הדריסה והרצח הוגדרו כפיגוע, ולא כדריסה בשוגג, על ידי ארגון חמאס¹⁴, כמו גם על ידי ארגונים אחרים שחלקו כבוד למחבל בכרזות האבל שלהם ובנאומים ובהתבטאויות אחרות. החמאס, שלא כארגונים האחרים, הכיר בעבד אלרחמן אלשלוּדי כפעיל הארגון (על הזיקה ההדוקה של ארגון החמאס לפיגוע זה ראה פרק נפרד בהמשך חוות דעת זו).

על בסיס התיאורים שהובאו לעיל מפי עדי הראיה, על בסיס אופי ההתנהגות של המחבל עבד אלרחמן אלשלוּדי במהלך אירוע הדריסה, לפני ביצוע הדריסה והרצח ולאחריו, על בסיס הכרתם של כלל ארגוני הטרור ושל דוברי הרשות הפלסטינית בדריסה וברצח כפיגוע, אני קובע כי אירוע הדריסה והרצח מיום 22 באוקטובר 2014 הינו פיגוע טרור שבוצע בזדון ובמתכוון על ידי המחבל עבד אלרחמן אלשלוּדי שהוכר על ידי החמאס כפעיל חמאס בעת ביצוע הפיגוע.

¹² רונן מזרחי, חוקר במשטרת ישראל, שהיה על הרכבת הקלה כשהתרחש הפיגוע, תאר את מהלך העניינים כלהלן: הוא רץ אחרי המחבל הבורח. צעק לו לעצור. כשראה שאין אנשים ביניהם ירה פעם או פעמיים באוויר. החשוד המשיך לרוץ. קרא לו שוב לעצור ואז, משזה המשיך לברוח, ירה בו 4-5 כדורים והוא נפל על הדשא. מזרחי ערך חיפוש על גופו של המחבל ומצא את תעודת הזהות שלו. עדותו נגבתה ביום הפיגוע, תיק משטרת מס' 466226/2014.

¹³ כך למשל עדה שנשאלה אם להתרשמותה היתה הדריסה מעשה מכוון, אמרה: "ברור, הוא בא במהירות כזאת ועלה על הרציף שבו אנשים עמדו ופגע ברכבת, הוא יס' וגם ניסה לברוח. אני גם ראיתי שהוא מכוון את הרכב לכיוון אנשים, הוא לא נסע ישר אלא לכיוון האנשים (עדוּתה של נוסעת הרכבת הקלה, אורית אסולין). אחר אמר: "הרכב נסע בפראות במקום שבו אין שום סיבה לרכב לנסוע, אפילו אם הנהג מאבד שליטה אין סיבה שיסע במקום כזה", הוא פגע באשה מבוגרת, המשיך ופגע בעמוד ונעצר, ואז יצא מהרכב ונמלט. מוסר העדות רדף אחריו והבחין בשניים נוספים הרודפים אחריו, ואז ירו בו והוא נפל. "אני נהג 40 שנה" אמר "ומיד הבנתי שלא מדובר בנהג שיכור כיוון שהוא נסע במקום צר שלא יכול לנסוע בו רכב גדול, במהירות מופרזת. הוא נסע בצורה מקצועית, כי נהג רגיל לא יכול היה לעבור במעבר כזה צר ועוד במהירות גבוהה, כך שנראה לי שהוא התכוון לפגוע באנשים, בפרט לאור העובדה שבמקום שבו הוא נסע יש הולכי רגל רבים, וזה לא מיועד לרכב מכל סוג שהוא" (עדוּתו של אלי דיין, נסע ברכבת שהגיע לתחנה יחד עם בנו, וירד ממנה בעת התרחשות הפיגוע). נוסע נוסף הוסיף כי הנהג עלה לאט על המדרכה ואז הגביר את נסיעתו ודרס את האנשים ולאחר מכן, ניסה להימלט מהמקום, הוא מיד הבין שמדובר בפיגוע (עדוּתו של גייסון מלמד). עדים נוספים דיווחו על התרשמותם הברורה מכוונת הזדון שעמדה מאחורי דריסת האנשים בתחנה על ידי המחבל שנהג רכב הפולקסוואגן. כל העדויות הנ"ל הן מתיק משטרת מס' 466226/2014.

¹⁴ ראה לעניין זה לדוגמה סקירת "המכון לחקר תקשורת המזרח התיכון-ממרי", 19 בנובמבר 2014:

Hamas praises recent terror attacks in Israel and calls for escalation and launch of new Intifada

<http://www.memri.org/en/report/0/0/0/0/8249>

פרופיל המחבל עבד אלרחמן אדריס מחמד-יחיא אלשלוּדי (כינויו: עבּוד)¹⁵

המחבל עבד אלרחמן אדריס מחמד-יחיא אלשלוּדי יליד 1993, תושב סילוּאן שבירושלים¹⁶, לאחר מותו כונה גם "השהיד המקדסי"¹⁷ - כלומר, הירושלמי. למד והתחנך בבית הספר השרעי "אלאקצא", בית ספר דתי אסלאמי. עבד אלרחמן אלשלוּדי היה אחיינו של מוחי אלדין אלשריף, אחד מבכירי זרוע הטרור המבצעית של חמאס בגדה המערבית בשנות ה-90, ומי שנחשב לדמות נערצת ומודל לחיקוי בקרב מחבלי ארגון החמאס ותומכיו עד היום¹⁸. כפי שנראה בהמשך חוות דעת זו, לדמותו של מוחי אלדין אלשריף הייתה השפעה משמעותית על חייו של עבד אלרחמן אלשלוּדי כבר בעת היותו ילד קטן.

לצד פעילותו כפעיל טרור בעל אידאולוגיה לאומנית אסלאמיסטית, כפי שיפורט בהמשך, שלח עבד אלרחמן אלשלוּדי את ידו בפעילות פלילית. כך למשל, במרס 2014 נעצר בחשד שגנב בעצמו את רכבו עליו הודיע

¹⁵ הכינוי 'עבּוד' הופיע בכתב האישום המפורט, מדינת ישראל נגד אלשלוּדי, בית המשפט המחוזי בירושלים, ת"פ-47016-09-12.

¹⁶ סילוּאן (בערבית: سلوان) או כפר השילוח, היא שכונה בדרום-מזרח ירושלים, על שלוחה היורדת מהר הזיתים דרומה, ומשני צדי נחל קדרון בסמיכות לאזור המכונה "האגן הקדוש".

¹⁷ כינוי זה של עבד אלרחמן אלשלוּדי, כמו גם שמו המלא ופרטים אישיים נוספים, הופיעו באתר "אלקדס" הנקרא: 'העיר ירושלים'. האתר, לפי דף האינטרנט הראשי שלו (<http://www.alquds-online.org/index.php?s=home>) שייך למוסד אלקדס (ירושלים) הבינלאומי, שהוא ארגון ערבי מוסלמי ששם לו למטרה לפעול לקידום זהותה הערבית של ירושלים. זוכה לתמיכתם ולהשתתפותם בכינוסיו של בכירי חמאס כמו ראש ממשלת חמאס אסמאעיל הניה, מנהיג חמאס ויו"ר הלשכה המדינית שלה ח'אלד משעל, ובכיר חמאס ברצועת עזה מחמוד אלזהאר.

כתבת מל"מ:

http://www.terrorism-info.org.il/data/pdf/PDF_11_079_1.pdf

<http://www.alquds-online.org/items/83>

¹⁸ בשל מרכזיות דמותו של מוחי אלדין אלשריף וההשפעה שלו על עיצוב דמותו של המחבל האחראי לפיגוע להלן פרופיל קצר של מחבל החמאס הבכיר:

מוחי אלדין ריבחי סעיד אלשריף יליד 1966, התגורר בבית חנינא/ירושלים. היה אחד מראשי זרוע הטרור המבצעית של חמאס בגדה המערבית, גדודי עז אלדין אלקסאם. למד הנדסת חשמל באוניברסיטת אלקדס בירושלים, דבר שהכשיר אותו להיות מומחה חבלה של החמאס. עוד במהלך לימודיו הצטרף לארגון. בשל פעילותו במסגרת הארגון נעצר לראשונה על ידי ישראל ב-1991 (נידון ל-20 חדשי מאסר) ופעם נוספת ב-1993 (נידון לשנה וחצי מאסר). עם שחרורו, חבר לראש זרוע הטרור המבצעית של החמאס באותה עת, יחיא עיאש, שהתפרסם בשל יכולותיו הטכניות לייצר מטעני נפץ וחגורות נפץ, וכונה המהנדס מספר 1. לימים, לאחר שעיאש חוסל על ידי ישראל (ינואר 1996) ירש מוחי אלדין אלשריף את מקומו בראש מערך ייצור מטעני הנפץ של חמאס בגדה המערבית, וכונה המהנדס מספר 2. מוחי אלדין אלשריף היה אחראי לפעולות טרור רבות, לרציחתם של עשרות חפים מפשע ולפציעתם של מאות. הוא היה מבוקש על ידי כוחות הבטחון של ישראל במהלך שנות פעילותו, עד שנהרג במרס 1998 מהתפוצצות מטען חבלה אותו הכין במוסך ברמאללה. המטען נועד למכונית תופת שאמורה הייתה להתפוצץ בירושלים. כאמור דמותו של מוחי אלדין אלשריף אשר בצילה גדל המחבל עבד אלרחמן אלשלוּדי, הפכה למודל נערץ לחיקוי בקרב אנשי ארגון החמאס ותומכיו.

להרחבה אודות מוחי אלדין אלשריף ופעילותו הטרוריסטית במסגרת החמאס ראה:

גיא אביעד, "לקסיקון חמאס", מודן הוצאה לאור, 2014, עמודים 332-334, וכן מיכאל מילשטיין, "המהפכה הירוקה דיוקנה החברתי שלתנועת החמאס", מרכז משה דיין ללימודי המזרח התיכון ואפריקה, אוניברסיטת תל-אביב 2007, עמוד 187

במשטרה כי נגנב ממנו¹⁹. באוגוסט 2014 נעצר שוב, הפעם על רקע נהיגה שלא בהתאם לחוק²⁰, ברכב שבו ביצע מאוחר יותר את הפיגוע. הוא הוזמן למשפט בנובמבר 2014, אליו כבר לא הגיע לאחר שנהרג בפיגוע שביצע שלשה שבועות קודם לכן.

לאורך השנים השתתף עבד אלרחמן אלשלוּדי בפעילות בעלת אופי טרוריסטי לאומני, כך למשל:

ב-19 בספטמבר 2012 נעצר ונידון למאסר בן שנה ושלושה חודשים כאסיר ביטחוני, על מעורבותו בפעילות שכללה פיגועי יידי בקבוקי תבערה לעבר בתי יהודים ומכוניות משטרה בירושלים, יידי נפצים ואבנים לעבר כלי רכב משטרתיים והפרות סדר על רקע ביטחוני²¹. בפעילות ביטחונית אינטנסיבית זאת לקחו חלק גם שני אחיו של המחבל הדורס: עז אלדין ועבדאללה²². בגזר הדין בערעורם של שותפיו של אלשלוּדי לפעילות הביטחונית, על עונשי המאסר שנגזרו עליהם, קבע בית המשפט העליון בישראל כי העבירות נעשו על רקע **אידיאולוגי** (הדגשה שלי א.ש.) ומורשעים אלה סווגו **כאסירים ביטחוניים**²³ (הדגשה שלי א.ש.).

בפברואר 2014 נעצר עבד אלרחמן אלשלוּדי פעם נוספת ונחקר על ידי שירות הביטחון הכללי של ישראל (השב"כ). הדין בעניינו בבית המשפט היה חסוי, והוא שוחרר ב-3 במרס 2014 מבלי שהועמד לדין²⁴.

עברו הביטחוני-טרוריסטי היה ידוע היטב לגורמי הביטחון והמודיעין, כך עולה בין היתר מדיווחו של השוטר שנשלח לזירת הפיגוע. על פי עדותו בהיותו בדרך למקום, קבל דיווח כי המחבל הינו אדם עם רקע של הכנת מטעני חבלה ושימוש בהם (עוד בעניין זה, ראה בהמשך)²⁵.

¹⁹ בעניין זה נפתח תיק משטרתית במרס 2014, 144773/2014 ואלשלוּדי נחקר בתחנת הראל-ציון של משטרת ישראל.

²⁰ הזמנה לדין וכתב אישום, מדינת ישראל נגד עבד אלרחמן אלשלוּדי מיום 23.8.2014, תיק משטרתית מס' 60250267181

²¹ עיקרי כתב האישום שהוגש נגד עבד אלרחמן אלשלוּדי מפורטים בהחלטת שופט בית המשפט המחוזי בירושלים, מיום 10.10.2012 שדן בעניין הארכת המעצר, במשפט של מדינת ישראל נגד עבד אלרחמן אלשלוּדי, מת (י-ם) 47030-09-12, כן ראה גם כתב האישום המפורט מדינת ישראל נגד אלשלוּדי, בית המשפט המחוזי בירושלים, ת"פ 47016-09-12.

²² כתב אישום, מדינת ישראל נגד אלשלוּדי מיום 24.09.2012, ת"פ 47016-09-12, אישום מס' 1/א/1.

²³ גזר הדין ניתן על ידי בית המשפט העליון בשבתו כבית משפט לערעורים פליליים, בערעורם של חמישה מורשעים נגד מדינת ישראל, בפני שלושה שופטים ב-20.5.2013, ע"פ 2337/13 ו-2954/13

²⁴ התייחסות למעצר זה ניתן למצוא באתרים בערבית כמו אתר <http://www.alquds-online.org/items/83> הנ"ל, ובשיחה עם אמו של עבד אלרחמן לאחר מותו, שפורסמה באתר youtube:

<https://www.youtube.com/watch?v=hELsWWOrOhE>

²⁵ מידע זה הובא בעדותו של השוטר ארז תשתית, רב-סמל בכיר, חבלן במשטרת מחוז ירושלים, בדו"ח פעולה מס' 117 שמילא בערב הפיגוע, לאחר שהיה בזירת הפיגוע ובדק את כלי הרכב הדורס. בעקבות המידע שקבל בדרך למקום הפיגוע הוחלט לחפש מטענים בזירה ובוצע חיפוש מדוקדק ביותר ברכב.

הקשר של הפיגוע לחמאס

דרך הפעולה של חמאס

שתי סוגיות בעלות אופי מתודולוגי קשורות לדרך הפעולה של ארגון החמאס, ולהן השלכה על מסקנות חוות דעת זו. האחת, סוגיית נטילת האחריות הפומבית על פיגועים אשר לגביה, כפי שנראה להלן, אימץ הארגון בשנים האחרונות דרך פעולה השונה מבעבר והנמנעת מנטילת אחריות רשמית, ומנגד פרסום הצהרות ו"פיזור רמזים" המותירים ספק מועט בלבד באשר לזיקה שבין הפיגוע והמחבל או המחבלים שביצעו אותו, לבין ארגון החמאס. סוגייה שניה המלווה את העיסוק בזיקה שבין החמאס לבין הפיגועים שהארגון יזם והוציא לפועל, הינה סוגיית חברותם של מבצעי הפיגוע בארגון או היותם פעילים מבצעיים שלו. החמאס הינו ארגון טרור הפועל, מטבע הדברים, בחשאי ועל כן אינו שש, מטעמים מובנים, לחשוף בפומבי את זהותם של המחבלים הפועלים בשורותיו, הנחשפת בדרך כלל, רק לאחר ביצוע הפיגועים.

נטילת האחריות: ארגון החמאס נוהג בשנים האחרונות במדיניות של עמימות לגבי נטילת אחריות על פעילות הטרור המתבצעת על ידי זרוע הטרור המבצעית שלו, גדודי עז אלדין אלקסאם, זאת בניגוד לנוהגו בעבר עת ביקש להתהדר ולהשתבח בפעילות הטרור של אנשיו. מדיניות זו נובעת מחששו של שלטון החמאס (השולט מאז 2007 ברצועת עזה) כי כול נטילת אחריות רשמית על פיגוע, תגרור בעקבותיה תגובה צבאית חריפה מצד ישראל נגד הארגון ומוסדותיו ברצועת עזה (ראה, למשל, פיגוע חטיפת שלושת הנערים בגוש עציון ביוני 2014 שגרר את העימות המזוין ברצועת עזה המכונה "צוק איתן").

דוגמא למדיניות נטילת אחריות באיחור של החמאס הינו הפיגוע שבוצע ב-6 במרץ 2008 בישיבת מרכז הרב בירושלים, פיגוע בו רצח המחבל עלא' האשם אבו אדהים 8 תלמידי ישיבה ופצע נוספים. במשך למעלה משנתיים נמנע ארגון החמאס מליטול אחריות על הפיגוע באופן רשמי ורק ב-25 בדצמבר 2010 נמסרה הודעת נטילת האחריות הרשמית של חמאס לביצוע הפיגוע בישיבת מרכז הרב. את ההודעה הקריא במסיבת עיתונאים בעזה אבו עוביידה, דובר גדודי אל-קסאם, (זרוע הטרור המבצעי של ארגון החמאס)²⁶ אשר מסר רשמית על נטילת אחריות לשישה פיגועי טרור שבוצעו בשנים האחרונות, ובהם פיגוע הירי בישיבת מרכז הרב בירושלים. בהנמקות לאיחור בנטילת האחריות שהופיעו באתר גדודי עז אל דין אלקסאם נמנו סיבות כמו "בטחון לוחמי הג'האד ובטחון תנועותיהם" דבר המלמד על כך שעיתוי נטילת האחריות הרשמיות של ארגון החמאס מושפע משיקולים שונים אותם מביא הארגון בחשבון בבואו ליטול אחריות רשמית על

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<http://www.alqassam.ps/arabic/%D8%A8%D9%8A%D8%A7%D9%86%D8%A7%D8%AA-%D8%A8%D9%84%D8%A7%D8%BA%D8%A7%D8%AA-%D8%A7%D9%84%D9%82%D8%B3%D8%A7%D9%85/4336/%D8%A7%D9%84%D9%85-%D8%A4%D8%AA%D9%85%D8%B1-%D8%A7%D9%84%D8%B5%D8%AD%D9%81%D9%8A-%D9%84%D9%83%D8%AA%D8%A7%D8%A6%D8%A8-%D8%A7%D9%84%D9%82%D8%B3%D8%A7%D9%85-%D8%AD%D9%88%D9%84-%D8%AD%D8%B5%D8%A7%D8%AF-23-%D8%B9%D8%A7%D9%85%D8%A7-%D9%85%D9%86-%D9%85%D8%B3%D9%8A%D8%B1%D8%AA%D9%87%D8%A7-%D8%A7%D9%84%D8%AC%D9%87%D8%A7%D8%AF%D9%8A%D8%A9;>
<https://www.youtube.com/watch?v=AN-dH9aBQ98;>
[https://www.youtube.com/watch?v=UAUUEDTK5Nc.](https://www.youtube.com/watch?v=UAUUEDTK5Nc)

פעולות הטרור שביצעו אנשיו וכי שיקולי כדאית מבצעית קודמים לשיקולי היוקרה והרצון להתהדר בביצוע מעשי הטרור ולהאדיר את שם הארגון בעיני הציבור. חמאס ממשיך להסית בפומבי קורא לביצוע פיגועים נגד אזרחים בישראל ומעודד פיגועים כאלה (מבלי שיוציא הנחיות לפיגועים ספציפיים) כולל פיגועי דריסה ודקירה.

ישראל רואה בשלטון החמאס כתובת למעשי הארגון באשר הם. ועל כן הארגון נמנע ליטול אחריות פומבית ורשמית לפיגועים ספציפיים "מסתפק" באמירות שלאחר מעשה כי הטרוריסטים היו אנשי עז אלדין אלקסאם, אמירות אותן ניתן למצוא בעיקר באתרי הארגון על שלוחותיו השונות, בדברי מנהיגים בארגון המשבחים את פעולות הטרור ובהלוויות של מחבלים הרוויות בסמלי הארגון. חריגה לענין זה היא נטילת האחריות הפומבית והנחרצת של פעיל החמאס הבכיר, צאלח אלעארורי, על חטיפת שלושת הנערים ורציחתם, ביולי 2014, התבטאות אשר הביכה את הארגון ומנהיגיו וגררה כאמור תגובה חריפה מצד ישראל.

החברות בארגון החמאס: החמאס הינו ארגון טרור הפועל בחשאי ומנסה להסתיר את זהות פעיליו המבצעיים לאורך כול שנות קיומו. למיטב ידיעתי, הארגון אינו מנפיק "תעודות חבר" בחמאס או בזרוע הטרור המבצעית שלו – גדודי עז אלדין אלקסאם. במקרה שבו אין הרשעות קודמות של המחבל בחברות בחמאס (כמו במקרהו של עבד אלרחמן אלשלודי) ניתן לעמוד על השייך והזיקה הארגונית בעזרת שלל סימנים מעידים מסוגים שונים. התנהגותו של המחבל, נטיותיו האידאולוגיות, משפחתו וחבריו, התייחסות אחרים אליו ובעיקר יחס הגורמים השונים בארגון החמאס למחבל לאחר חשיפתו.

תנועת החמאס מקיימת מעין רשת ביטחון סוציאלית לטרוריסטים הפועלים בשורותיה ובני משפחותיהם במקרה שטרוריסטים אלה נהרגים או במקרה בו הם נתפשים מועמדים לדין ונשלחים לתקופות מאסר ארוכות בדרך כלל. רשת בטחון זו בדמות אגודות צדקה שאינן אלא אירגוני חזית של החמאס דואגת לפצות את המשפחות בצורות מגוונות הכוללות מענקים חד פעמים, תמיכה כספית או במוצרים לקראת החגים המוסלמים, נשיאה בהוצאות החינוך של בני המשפחה וכמובן פיזי אם בית המשפחה נהרס כפעולת עונשין בגין ביצוע פיגוע על ידי בן המשפחה. על בסיס היכרותי עם מאות מקרים מעין אלו סביר להניח כי גם משפחת שלודי זוכה ותזכה לתמיכת החמאס על מוסדותיו השונים.²⁷

²⁷ כמו כן הובטחה תמיכה חומרית ישירה מצד איראן למשפחות מחבלים מגל הטרור הנוכחי אשר התחיל ב-2015 בניהם נהרגו או בתיהם נהרסו. לעניין זה ראה סקירת מל"מ : <http://www.terrorism-info.org.il/en/article/20969>

פירוט

ניתוח דמותו של המחבל עבד אלרחמן אלשלוּדי, כפי שבאה לידי ביטוי בפרופיל שהובא לעיל, מעלה כי מדובר בצעיר בן הכפר סילואן, כפר שבו תשתית מבוססת של ארגון החמאס²⁸, בעל רקע אידאולוגי דתי אסלאמיסטי, אשר חונך בבית ספר דתי, גדל במשפחה בעלת זיקה הדוקה לארגון החמאס, שלח ידו משחר נעוריו בפעילות לאומנית בעלת אופי טרוריסטי, נעצר ונחקר יותר מפעם אחת ואף נתן את הדין על פעילותו זאת. לפחות שניים מאחיו של המחבל היו שותפיו לפעילות טרוריסטית זו. אחיו של המחבל - עז אלדין אדריס אלשלוּדי, יליד 1998 היה אף הוא תלמיד בית הספר התיכון הדתי "אלאקצא". הוא הועמד לדין ב-2012 יחד עם אחיו על מעורבות בפעילות ביטחונית בסילואן ואף נחקר בחשד שהינו קשור לפיגוע הדריסה שביצע אחיו. עבדאללה - אח נוסף של המחבל, השתתף אף הוא בידי בקבוקי התבערה בסילואן ב-2012.

זיקתו ההדוקה של עבד אלרחמן אלשלוּדי לארגון החמאס נעוצה ברקע הביוגרפי/משפחתי של המחבל. דודו של עבד אלרחמן אלשלוּדי מצד האם, היה מוחי אלדין אלשריף, אחד מראשי זרוע הטרור המבצעית של החמאס אשר נחשב למודל לחיקוי בקרב אנשי הארגון (ראה פרופיל שלו לעיל).

ילדותו של המחבל התנהלה בצל פעילותו של הדוד וכך העידה אמו של עבד אלרחמן אלשלוּדי בראיון שנתנה, ביום השנה ה-19 למות אחיה, מוחי אלדין שריף, לאתר "פלסטין": לדבריה, הביטוי "שני שלישי מהילד (עוצב על ידי) דודו" מתאים, מלה במלה, לבנה שנהרג כמה חודשים קודם לכן. היא סיפרה שילדותו היתה ספוגה בהתנגדות לישראל על רקע החיפוש ששעו כוחות הביטחון אחר דודו המבוקש אלשריף, בבית סבו של עבד אלרחמן, שבו שהה גם עבד אלרחמן עצמו. סיורי משטרה היו מעכבים את עבד אלרחמן פעמים רבות והוא נהג להרגיז את חיילי השיטור בכל פעם שפגש בהם, ונהג להתנכל לילדי היהודים ששחקו בסביבת מגוריו. הוא היה מראשוני תושבי השכונה שהשתתפו בעימותים, זרק בקבוקי תבערה ואף היה מבוקש על ידי כוחות הביטחון במשך כשלושה חודשים במהלך שנת 2012.²⁹

²⁸ בכפר סילואן התקיימה ומתקיימת פעילות חמאס נרחבת. השפעתו הרחבה של ארגון החמאס בכפר נובעת בין היתר מהרכב האוכלוסייה בכפר זה, שבו מתגוררות משפחות רבות מחברון אשר העתיקו אליו את מקום מגוריהן במהלך עשרות השנים האחרונות. חברון, שאוכלוסייתה בדרך כלל מוסלמית דתית, נחשבת לאחד ממעוזי החמאס בגדה המערבית. חוליה של תושבי סילואן המשתייכים לחמאס ביצעה, בתחילת שנות האלפיים, פיגועים קשים בישראל שהביאו למותם של עשרות אנשים, בהם הפיגוע בקפה מומנט בירושלים, הפיגוע במועדון "שפילד קלאב" בראשון לציון וכן הפיצוץ בקפטריה באוניברסיטה העברית בירושלים. מוכרים לא מעט מקרים של פעילי חמאס מסילואן שנעצרו על ידי כוחות הביטחון של ישראל (למשל: מחמד אבו תאיה מסילואן נגדו הוגש כתב אישום בפברואר 2015 <http://www.inn.co.il/News/News.aspx/293090>). גם מוסדות חמאס נסגרו בסילואן בינואר 2012²⁹ המוסדות נסגרו על רקע מידע שהיה בידי משטרת ישראל על השימוש הנסתר שעושה החמאס במוסדות אלה.

(<http://www.inn.co.il/News/News.aspx/232585>)

²⁹ המנעותו של אלשלוּדי מהתייצבות במשטרה צוינה על ידי שופט כאחת הסיבות שבשלה אישר את מעצרו עד תום ההליכים באוגוסט 2012. מדינת ישראל נגד עבד אלרחמן אלשלוּדי, מת (י-ם) 47030-09-12. התנהגותו כמבוקש הזכרה גם בראיון שנתנה אמו של עבד אלרחמן אלשלוּדי לאתר פלסטין ביום השנה ה-19 למות המחבל מוחי אלדין אלשריף התפרסם באתר זה

<http://felesteen.ps/details/news/136401/%D8%B9%D8%A8%D8%AF-%D8%A7%D9%84%D8%B1%D8%AD%D9%85%D9%86-%D8%A7%D9%84%D8%B4%D9%84%D9%88%D8%AF%D9%8A-%D8%B9%D9%84%D9%89-%D8%AE%D8%B7%D9%89->

ארגון החמאס מצדו, פרסם בפומבי את הקשר שבין המחבל לבין הארגון כשנה לפני פיגוע הדריסה. כן, עם שחרורו של עבד אלרחמן אלשלוּדי מהכלא ב-2013, נתלה לכבודו שלט ברכה גדול מטעם התנועה האסלאמית עליו הופיעה תמונתו לצד תמונתו של מייסד החמאס השיח' אחמד יאסין ודודו של אלשלוּדי, המחבל, שזכה לכינוי "המהנדס מס' 2" של החמאס, מוחי אלדין אלשריף. באתר שפרסם תמונה זאת, לאחר מותו של אלשלוּדי, נכתב כי האחרון השתייך לארגון החמאס³⁰. (הדגשה שלי א.ש.)

על האידאולוגיה האסלאמיסטית שעמדה מאחורי ביצוע הפיגוע ועל הקשר בין המוטיבציה של המחבל לבצע את הפיגוע לבין ארגון החמאס, ניתן ללמוד מדף הפייסבוק שלו בו פרסם עבד אלרחמן אלשלוּדי סרטונים של גדודי עז אלדין אלקסאם ונאומים של מחמוד אלזהאר, בכיר החמאס מעזה. ב-19 בספטמבר 2014 הוא שיתף סרטון של ערוץ אלג'זירה אודות ארגון דאעש³¹. פעילותו האחרונה בדף הפייסבוק היתה ב-11 באוקטובר 2014, אז שיתף סרטון המציג אימונים של גדודי עז אלדין אלקסאם. ב-10 באוקטובר פרסם תמונה של מסגד אלאקצא בוער ובתמונה נכתב "אלאקצא בסכנה... אלאקצא בסכנה... אומתו של מחמד". הוא הוסיף כיתוב משלו לתמונה ורשם: "צאו למסע לאלאקצא. בוקר טוב".

עמדנו כבר בחוות דעת זו על העובדה שארגון החמאס ומנהיגיו עודדו ביצוע טרור במאפייני דריסה ודקירה, תחת הסיסמה לפיה מסגד אלאקצא נמצא בסכנה ועל המאמינים להתגייס להגנתו באמצעות ביצוע פיגועים מסוג זה. לאחר מות המחבל פרסם החמאס כרזת אבל ובה נכתב: "תנועת ההתנגדות האסלאמית מבכה את מות בנה (הדגשה שלי א.ש.) השהיד הגיבור עבד אלרחמן אלשלוּדי בן 23, מבצע פעולת ירושלים הנועזת אשר גרם לדריסת תשעה מתנחלים בשכונת אלשיח' ג'ראח. וזהו הג'האד... לנצח או להפוך לשהיד" (PALDF, 23.10.2014). מודעות אבל על מותו של עבד אלרחמן אלשלוּדי התפרסמו מטעם ארגונים שונים, אך רק מודעת החמאס כנתה אותו 'בן התנועה'³² ובכך אימץ אותו הארגון לשורותיו באופן פומבי, ולמעשה הודה רשמית כי המחבל הינו פעיל של הארגון.

<http://www.paldf.net/forum/showthread.php?t=1157725>

³⁰ התמונה וההסברים הופיעו בבלוג המתיימר להיות חמאסי שכתובתו משלבת בין שמו של מייסד החמאס - יאסין ושמה של זרוע הטרור של חמאס "גדודי עז אלדין אלקסאם":

http://yaseenizeddeen.blogspot.co.il/2014/10/blog-post_79.html

³¹ בדיקת דף הפייסבוק של אלשלוּדי נעשתה על ידי מל"מ והתפרסמה בכתבה הסוקרת את הפיגוע שבמרכז תביעה זאת

<http://www.terrorism-info.org.il/he/articleprint.aspx?id=20722>

³² כרזת החמאס התפרסמה באתר המזוהה עם חמאס www.paldf.net

<https://www.paldf.net/forum/showthread.php?t=1157725>

אודות זיהויו של האתר עם החמאס, ראה כתבת מל"מ מיום 20.7.2009

Terrorism and the media: Hamas gives priority and invests resources in rehabilitating, reinforcing and expanding its media empire, damaged during Operation Cast Lead

http://www.terrorism-info.org.il/data/pdf/PDF_09_192_2.pdf

על בסיס ניסיוני המקצועי (הכולל בין היתר עיון בעשרות חקירות של מחבלי חמאס העוסקות גם בסוגיית הגיוס לתנועת החמאס לאורך השנים) ההצטרפות לחמאס כפעיל (או כחבר התנועה) כרוכה בהליך גיוס לשורות התנועה על ידי מי שמוסמך לעשות כן מטעמה. המגייס לשורות התנועה משמש כבר כפעיל התנועה והוא מגייס חברים חדשים לצורך ביצוע משימות שונות בשירות החמאס (אלה יכולות להיות משימות טרור מבצעיות או פעילויות אחרות המשרתות את מטרת התנועה).

המגויסים לתנועה (דוגמת שלודי) הינם צעירים (בדרך כלל) המזדהים רעיונית עם האידיאולוגיה של חמאס ומוכנים לשרת במסגרת תנועת החמאס. הנה כי כן הבחירה של גורמי החמאס להשתמש בביטוי "בן התנועה" מחזק אף הוא (בנוסף לסימנים נוספים שהובאו בחוות דעת זו) את העובדה כי שלודי היה פעיל חמאס בעת שביצע את פעולת הדריסה.

בדפי פייסבוק המזוהים עם חמאס³³ פורסמה כרזה ובה תמונתו של אלשלודי, וברקע מופיעה גם תמונתו של מחי אלדין אלשריף. בכרזה נכתב כי פיגוע הדריסה בוצע כנקמה על דריסתה של ילדה בת ארבע שנפגעה בתאונת דרכים יום קודם, ובתחתית הכרזה נכתב "הגיבור עבד אלרחמן אלשלודי, מבצע פעולת דריסת המתנחלים בעיר ירושלים". בכרזות נוספות שהופצו בפורום חמאס עם תמונתו של אלשלודי, נכתב: "להבות ההתנגדות"³⁴ ישרפו את מוט שקריכם"³⁵.

חמאס והנהגתו שיבחו את הפיגוע, כמו גם פיגועים נוספים שנעשו בירושלים בסמיכות זמנים³⁶. זאת על פי דרך הפעולה שתוארה לעיל, לפיה החמאס קורא לביצוע פיגועים במאפייני דקירה ודריסה מבלי לתת הוראות נקודתיות לפעילים, ואלה מבצעים את הפיגועים כהענות לקריאה הכללית ועל בסיס ההסתה של בכיר התנועה לקום ולעשות מעשה.

בכיר החמאס חסאם בדראן, ברך על הפיגוע ואת מבצעו והוסיף כי "הגיבור אלשלודי הלך בדרכו של דודו שהייד המפקד מוחי אלדין אלשריף". בדראן אף הסית את הציבור לביצוע פיגועים נוספים באומרו כי על בני העם הפלסטיני בגדה הכבושה ליזום "ולחדש בדרכי התנגדותם לכיבוש, בין אם בפעולות מאורגנות או ביוזמה אישית". ארגון חמאס ברך את "בנו (הדגשה שלי א.ש.) שהייד הגיבור עבד אלרחמן אדריס אלשלודי"³⁷.

³³ בין השאר, באתר PALDF המזוהה עם חמאס מיום 23.10.2014.

³⁴ המלה 'התנגדות' משמשת, לעתים, כקיצור לתנועת ההתנגדות האסלאמית, הלא היא חמאס.

³⁵ סקירת מל"מ על הפיגוע שבבסיס תביעה זאת, מיום 23 באוקטובר 2014

<http://www.terrorism-info.org.il/he/articleprint.aspx?id=20722>

³⁶ הדברים הופיעה בסקירה מס' 5886 מסוף 2014 של "המכון לחקר תקשורת המזרח התיכון/ממרי", על יחס החמאס להסלמה בפיגועי הטרור שכותרתה:

Hamas Praises Recent Terror Attacks In Israel, Calls For Escalation And Launch Of New Intifada, Threatens: 'The Palestinian Volcano Will... Erupt In Occupation's Face'

http://www.memri.org/report/en/0/0/0/0/0/8249.htm#_ednref2

³⁷ התשבחות לפיגוע ולמבצעו, כמו גם הקביעה כי אלשלודי השתייך לחמאס, הופיעו באתר של "תנועת ההתנגדות העממית", גוף הכולל ארגונים שונים הרואים עצמם חברים בגוף זה: תנועת ההתנגדות העממית בפלסטין, תנועת ההתנגדות האסלאמית חמאס ותנועת החופשיים הפלסטינית.

<http://www.mogawmh.ps/%D8%AE%D8%A8%D8%B1/%D9%81%D8%B5%D8%A7%D8%A6%D9%84-%D8%A7%D9%84%D9%85%D9%82%D8%A7%D9%88%D9%85%D8%A9-%D8%AA%D8%B4%D9%8A%D8%AF->

בגיננו לפיגוע מטעם מחלקת המדינה האמריקאית, שולבו דבריו של דובר החמאס, חסאם בדראן, אשר שיבח את הפיגוע באומרו כי "זאת תגובה טבעית לפשעים של הכיבוש ולפלישת היהודים לאדמותינו, במיוחד למסגד אלאקצא"³⁸. (בהודעה המתארת את הגיננו של מחלקת המדינה לעיל מוזכר כי התקשורת הישראלית ציטטה את דברי דובר החמאס)

בלווייתו של עבד אלרחמן אלשלוּדי נשאו האבלים דגלים המזוהים עם החמאס, וגופתו של המחבל, שהיתה עטופה קודם בתכריכים לבנים, נעטפה לכבוד הלוויה בתכריכים ירוקים המסמלים את הקשר לחמאס³⁹.

בלווייה הסמלית⁴⁰ שנערכה לאלשלוּדי בסילואן, מקום מגוריו, נישא ארון מתים עטוף בבדים ירוקים והושמעו קריאות בזכות חטיפת ישראלים⁴¹. בית המשפחה עוטר בדגלים האופייניים לחמאס (דגלים ירוקים עם פסוקי הקראן) לאחר מותו⁴².

<http://www.state.gov/r/pa/prs/ps/2014/10/233279.htm>
<http://www.cnsnews.com/news/article/patrick-goodenough/state-dep-t-calls-restraint-all-sides-after-american-baby-killed>

³⁸ הודעת מחלקת המדינה האמריקאית כפי התפרסמה ב-22 באוקטובר 2014

<http://www.state.gov/r/pa/prs/ps/2014/10/233279.htm>

ההודעה המורחבת התפרסמה בתקשורת האמריקאית למחרת הפיגוע, ב-23 באוקטובר 2014

<http://www.cnsnews.com/news/article/patrick-goodenough/state-dep-t-calls-restraint-all-sides-after-american-baby-killed>

³⁹ את תמונת הגופה של אלשלוּדי, עטופה בתכריכים ירוקים ניתן לראות באתר:

<http://nawa.ps/arabic/?Action=Details&ID=14239>

לווייתו של אלשלוּדי בה הונפו דגלים המזוהים עם חמאס, לצד דגלים צהובים, וכן התפרעויות והפרות סדר הופיעה בסרטון שהופץ ב-youtube:

<https://www.youtube.com/watch?v=reT02C3br5Y>

⁴⁰ סרטון שצולם בהלווייה הסמלית פורסם באינטרנט. הלוויית סימליות נערכות לעיתים, מסיבות שונות לכבודם של מחבלים כדי להביע הוקרה ותמיכה במעשי המחבל.

<https://www.youtube.com/watch?v=tFOzIMt1s6k>

⁴¹ התמונה הופיעה בסקירת שבועית של מל"מ המתייחסת, בין השאר, לאירועים שבאו בעקבות פיגוע הדריסה. על פי סקירה זאת של מל"מ, מוסד המביא לעתים מידע ממקורות ביטחוניים כולל משירות הביטחון הכללי של ישראל (שב"כ), אלשלוּדי היה פעיל חמאס

http://www.terrorism-info.org.il/Data/articles/Art_20724/E_179_14_1108503703.pdf

⁴² בתמונה נראה הבית שבחזיתו שתי כרזות אבל על מותו של עבד אלרחמן אלשלוּדי, ומסביב דגלים ירוקים רבים שעל חלקם כתוב פסוק התשבחות לאללה, המאפיינים את דגלי החמאס אם לא מהווים את דגלו הרשמי

<http://rotter.net/forum/scoops1/149750.shtml#28>

לפי פרסומים באינטרנט מסר חמאס הודעה רשמית כי אלשלוּדי השתייך לשורות הארגון מבלי שייקח אחריות על הפיגוע שביצע⁴³. זאת על פי אותה שיטת פעולה אשר תארתי בחוות דעת זו, לפיה החמאס שמח לזקוף לזכותו פעילות טרור, מסית לה ומעודד את פעיליו לבצע את הפיגועים, אך נמנע לומר מפורשות כי הארגון אחראי לפיגוע מחשש לתגובה ישראלית קשה נגדו. התמונה העולה מהתנהגותם של המחבל לפני הפיגוע, והחמאס אחרי הפיגוע, הינה כי מדובר בפיגוע של פעיל חמאס שנענה לקריאות ראשי הארגון. ואלה מצדם שיבחו את הפיגוע ומבצעו והצהירו בפומבי כי המבצע הינו איש חמאס (בנה של תנועת החמאס, בלשונם). בנוסף לכך שלודי הגיע ממשפחה הידועה כמשפחה של פעילי חמאס ומכפר שתשתית החמאס בו בולטת וחזקה. שלודי הזדהה עם האידיאולוגיה של חמאס טרם ביצוע הפיגוע. יתר על כן בפוסטים בעמוד הפייסבוק לפני ביצוע הפיגוע שלו שלודי הצהיר כי הוא פועל להצלת אלאקצא בהתאם לקריאות החמאס לעשות כן. כמו כן בלטו בהלווייתו של שלודי סמלים של חמאס וכן התפרסמו פוסטרים (בהם תמונות שלו) המדגשים את שייכותו לחמאס.

עובדת היותו של עבד אלרחמן אלשלוּדי פעיל חמאס הייתה ידועה לגורמי הביטחון של מדינת ישראל, והמחבל אף נחקר על כך בתקופה שקדמה לביצוע הפיגוע. כך למשל, אמו של המחבל סיפרה כי בחקירתו על ידי שירות הבטחון הכללי של מדינת ישראל (שב"כ) נחקר אודות השתייכותו לארגון החמאס על בסיס מידע סודי שהיה בידי השב"כ בעת החקירה.⁴⁴

בנוסף, צטטה התקשורת האמריקאית גורמים ישראלים רשמיים שזיהו את אלשלוּדי כפעיל חמאס⁴⁵.

מכלל זה אני מסיק כי מדובר בפיגוע של החמאס שהתבצע על ידי פעיל טרור מבצעי של הארגון.

⁴³ <http://www.vetogate.com/1292077>

⁴⁴ http://www.alhaya.ps/arch_page.php?nid=246405

⁴⁵ ראה פרסום ב-CNSNEWS-

<http://www.cnsnews.com/news/article/patrick-goodenough/state-dep-t-calls-restraint-all-sides-after-american-baby-killed>

סיכום ומסקנות

על בסיס הנאמר בחוות הדעת שהגשתי לעניין רצח התינוקת חיה זיסל בראון, ביום ה-22 באוקטובר 2014, בתחנת הרכבת הקלה בגבעת התחמושת בירושלים, אני קובע :

אירוע הדריסה המתואר לעיל שבו נהרגו חיה זיסל בראון ואישה נוספת ונפצעו שבעה נוספים, היה פיגוע **טרור שתוכנן ובוצע בזדון כחלק מגל הטרור שפקד את ישראל בסוף 2014**, ואשר מאפייניו פיגועי דריסה ודקירה על ידי מחבלים בודדים או זוגות של מחבלים. זאת אני קובע על בסיס עדויות רבות של עדים שהיו במקום ואשר תארו את התנהגותו המכוונת של המחבל בשעת הפיגוע ולאחריו, וכן על בסיס העובדה שארגוני הטרור ובראשם החמאס הודיעו בפומבי כי מדובר בפיגוע טרור לכול ענין ודבר, שאותו עודדו

המחבל הדורס עבד אלרחמן אלשלוודי, היה פעיל טרור אידאולוגי אסלאמיסטי אשר נעצר, נחקר ונכלא בגין פעילותו הטרוריסטית. למחבל הייתה זיקה הדוקה לארגון החמאס **והוא הוכר באופן פומבי כפעיל מבצעי של ארגון החמאס** הן לפני והן לאחר הפיגוע. לאחר מותו הובלט מאוד דבר שייכותו הארגונית, הן באמירות מפורשות של בכירי חמאס והן בתמונות, בכרזות ובסממנים שהובלטו בהלוויתו (הסמלית והאמיתית) ובטקסי האבלות שאחריה.

ארגון **החמאס** התייצב בגלוי ובפומבי מאחורי הפיגוע והמחבל. דובריו הרשמיים של חמאס קראו להמשיך ולבצע פיגועים מעין אלה. הם הודו כי מעשה הדריסה הינו פיגוע שנועד לפגוע בישראלים, ושיבחו ופארו אותו. עוד הכריזו כי המחבל הינו פעיל מבצעי של החמאס (בהתיחסם אליו כבן התנועה במשתמע חמאס) ולמעשה בדבריהם אלה נטלו אחריות לפיגוע זה (אם כי בלי לומר זאת מפורשות מחשש תגובה). גם גורמי הביטחון של ישראל הצביעו על החמאס כמי שאחראי לפיגוע.

לסיכום אני קובע כי חיה זיסל בראון הייתה קורבן של פיגוע טרור של החמאס.

EXHIBIT 2

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

-----x
SHMUEL ELIMELECH BRAUN, *et al.*,

Plaintiffs,

Civ. No. 15-01136 (BAH)

v.

THE ISLAMIC REPUBLIC OF IRAN, *et al.*,

Defendants.

-----x

DECLARATION OF MARIUS DEEB

I, Marius Deeb, of Potomac, Maryland, this 21st day of May, 2016, declare pursuant to 28 U.S.C. § 1746, as follows, subject to the penalties for perjury:

A. Professional Background

1. I hold a Ph.D. from Oxford University in Politics and Arab and Islamic Studies and am a leading authority in Middle Eastern politics and history. I hold B.A. and M.A. degrees in political science and international relations from the American University in Beirut. My research focuses on political parties and movements, militant Islam in all its varieties, the Christian communities of the Middle East and Islam and the West. I have extensively studied the relationship between terror groups, such as Hamas and Hezbollah, and the regimes that sponsor and support them, *i.e.*, Iran and Syria.

2. I am now retired. I previously taught undergraduate and graduate level courses in Political Science and History at: The School of Advanced International Studies of Johns Hopkins University; Indiana University; The American University of Beirut; and Georgetown University.

3. I have previously been designated and qualified by federal courts as an expert witness on issues relating to Syria and its support for terrorist organizations, including Hamas, including in *Wultz, et al. v. Islamic Republic of Iran, et al.*, Case No. 08-1460 (RCL) (D.D.C.) and *Wyatt, et al. v. Syrian Arab Republic, et al.*, Case No. 01-1628 (RU) (D.D.C.).

4. My publications include: *Party Politics in Egypt: The Wafd and Its Rivals, 1919-1939*, St. Antony's College Oxford Middle Eastern Monographs, Ithaca Press, 1979; *The Lebanese Civil War* Praeger Publishers, 1980; *Libya since Revolution: Aspects of Social and Political Development* (coauthored with Mary-Jane Deeb), Praeger Publishers, 1982; *Militant Islamic Movements in Lebanon: Origins, Social Bias and Ideology* Georgetown University, 1986; *Syria's Terrorist War on Lebanon and the Peace Process*, Palgrave Macmillan Publishers, 2003; and *Syria, Iran and Hizbollah: The Unholy Alliance and its War on Lebanon*, Hoover Institution Press, Stanford University 2013. I have written over 173 articles on the Middle East published in scholarly journals and books. A complete list of my publications is included in my CV, attached hereto as Exhibit A.

5. Over the last forty years, I have delivered talks and participated in conferences sponsored by academic institutions and government agencies on topics related to Syria and Lebanon and their relationships with terror organizations. I have also testified before Congress about Syria and Lebanon. A list of my lectures can be found in my attached CV.

6. Over the last forty years, I have appeared in over 1,000 interviews in television, radio and print publications. During that time, I was a frequent commentator on topics related to terrorism in the Middle East on radio and television programs in the United States, United Kingdom and Canada, such as: NBC Nightly News, ABC Nightline, CNN News, INN TV, BBC,

National Public Radio and others. I have been quoted in the Washington Post, the Los Angeles Times, the Christian Science Monitor and the Boston Globe, among other print publications.

7. I am fluent in Arabic and have traveled extensively in the Middle East, including to Turkey, Jordan and Israel.

B. Nature of this Expert Witness Report

8. I have been asked by counsel for plaintiffs in the *Braun, et al. v. The Islamic Republic of Iran, et al.* (15-01136) (BAH) to provide my professional opinion as to whether the support Syria provide to Hamas prior to 2012 facilitated and enabled Hamas to carry out terrorist attacks in 2014.

9. My opinion, as set forth below, is based upon my academic studies, research, teaching positions and publishing over the course of many years as an academic specializing in Middle East history, politics and current affairs with a particular focus on militant Islam. I have obtained information from interviews with political leaders, reviews of documents, periodicals, credible news reports, discussions with reliable journalists, government publications and scholarly works, as well as from my own experience, working, living and traveling in the Middle East.

10. Moreover, in preparing this opinion, I have examined the complaint in the above referenced case.

C. The Early Years: 1987-2000

11. Hamas, an acronym for Harakat al-Muqawamah al-Islamiyya (Islamic Resistance Movement) was formed by Sheikh Ahmed Yassin in Gaza in 1987 from the Palestinian Muslim Brotherhood which historically originated as a branch of the Egyptian Muslim Brotherhood. As reflected in its charter, the goal of Hamas is to liberate all of Palestine

from Israeli occupation and to create an Islamic state in the entire area that is now Israel, the West Bank and Gaza. Hamas seeks to achieve this goal through *jihad* – or armed struggle against Israel. Hamas is considered a terrorist organization by the United States, Israel, the European Union and Canada.

12. In its early years, the Hamas terrorist organization carried out numerous deadly attacks against Israel using guns, knives and explosives.

13. In September 1989, Israel outlawed Hamas and arrested its top leaders, including Yassin. Thereafter, many Hamas leaders operated from exile in various locations, primarily in the Middle East. Hamas has had a presence in Syria since at least 1991.

14. In 1992, some of the Hamas leaders who had been exiled to Southern Lebanon by Israeli Prime Minister Rabin, encountered militants from the Hezbollah terrorist organization. As a result of this encounter, Hamas learned many terrorist techniques from Hezbollah, including that of the suicide bomber, which it has employed against Israel with devastating results.

15. In the mid-1990's, Hamas's military wing, known as the Izz al-Din al-Qassam Brigades, established an operational headquarters in Damascus, Syria. Hamas military leaders in Syria worked closely with Syrian military intelligence. For many years prior to 2012, Damascus was a center for Hamas's terrorist functions – from strategic planning to command and control. Instructions for terrorist attacks were transmitted directly from Damascus to the terrorist cell that was to carry out the attack. In addition, the Hamas office in Damascus transferred funding directly to its operatives in the West Bank and Gaza. Syria's sponsorship and support for Hamas also enabled Hamas to operate freely in Syrian-controlled Lebanon and to openly recruit Palestinian refugees there and to undergo joint training with Hezbollah.

16. Consistent with its founding ideology and charter, Hamas vehemently opposed the Oslo agreements signed between the Palestine Liberation Organization (“PLO”) and Israel in 1993 and 1995 which created the Palestinian Authority (the “Oslo Accords”). Therefore, Hamas intensified its armed struggle in the wake of the Oslo Accords, carrying out several deadly suicide attacks in the mid-late 1990’s, which resulted in death and injury to close to 150 Israelis and others.

17. Syria was aligned with Hamas in opposing the Oslo Accords. Thus, Syria intensified its support for Hamas, particularly for its engagement in terrorism, with the view that terrorism would help Syria fight the peace process and manipulate its own peace negotiations with Israel. The tactic of terrorism had the dual goal of harming Israel and its citizens and undermining the Palestinian Authority’s influence among Palestinians.

18. Hamas’s political leaders joined its military leaders in the organization’s Damascus headquarters in 1999 after being expelled from Jordan. From that time until 2011, the Senior Hamas leadership was based in Damascus. Khalid Mash’al, the head of the Hamas political bureau, moved permanently to Damascus in 2003.

19. The support which Syria provided to Hamas, by giving the organization and its leaders safe haven, allowing it to operate its military headquarters in Damascus and giving it access to other resources such as unrestrained access to funding, weapons, travel, communications, military training, intelligence and strategy proved significant for the terror organization’s overall operational infrastructure. Indeed, Hamas’s external leadership based in Damascus grew so powerful that it was able to control and direct operational decisions, at times even going against the wishes of Hamas’s leaders within Gaza. Furthermore, the resources

provided by Syria enabled Hamas to develop into a more sophisticated organization with the ability to carry out large scale attacks designed to achieve maximum carnage.

D. The Second Intifada and Beyond: 2000-2012

20. The Palestinian Authority launched the Second Intifada in September 2000, after the failure of the Israeli- Palestinian negotiations sponsored by President Clinton at Camp David. But Hamas had played a significant role in bringing the Palestinian Authority to that point by waging a campaign of violent terrorist attacks against Israel in the mid-late 1990's, perfecting its terrorist weapon of the suicide bomber. Hamas terror attacks during the Second Intifada resulted in more than 1,000 Israeli and other citizens being killed and more than 5,000 injured. Syria's support for Hamas, including the safe haven it provided and the unrestrained access to funding, weapons, travel, communications, military training, intelligence and strategy was a factor in the success of Hamas terrorist operations during the Second Intifada.

21. The Second Intifada came to an end with a cease fire in February 2005. Thereafter, in the summer of 2005, Israeli Prime Minister Ariel Sharon dismantled all of the Israeli settlements in Gaza. But, Hamas continued its terrorist activities against Israel. In the years after the end of the Second Intifada, Hamas decisions at the highest level, concerning both military and political activities were directed from its Damascus headquarters. For example:

- a. On June 25, 2006, Hamas in Damascus orchestrated the kidnapping of Israeli soldier Gilad Schalit (another terrorist tactic borrowed from Hezbollah which employed a similar tactics during the summer of 2006).
- b. In June 2007, Hamas in Damascus orchestrated the Hamas takeover of Gaza when it ousted the Palestinian Authority from Gaza.

- c. Hamas in Damascus was behind the provocation which led to the December 2008-January 2009 conflict in Gaza. Throughout the duration of that war, which was conveniently timed close to the forthcoming Israeli elections, all Syrian cell-phones received continuous updates on the war, calling for their support as though it was a surrogate Syrian war! In January 2010, Hamas leader Khalid Mash'al delivered a speech in Beirut in which he stated that it was Syrian support in that 2008-2009 conflict that made it possible for Hamas to win that war.

E. 2012 to the Present

22. In 2012, Hamas had a falling out with the Syrian regime over its support for rebel forces in the Syrian civil war. However, Hamas continues to benefit from the widespread support which it received from Syria prior to 2012.

23. Syria's extensive support for Hamas over the course of at least twenty years enabled it to transform itself into a leading terrorist group with a solid infrastructure and the power to wreak devastation against Israel and to disrupt the Israel-Palestinian peace process using a variety of tactics – from terrorism to politics. Syria was instrumental in propping up the Hamas leadership during these years and ensuring that it had access both to its own military strategists and to Hezbollah's resources in Lebanon, from which Hamas was able to learn terrorist strategies. The effects of this type of support continued to this day. Indeed, the Hamas organization continues to benefit from the strategies and training it acquired while in Damascus.

24. On the operational level, Syria provided Hamas with access to weapons, funding and military training. It continues to use these resources in carrying out new terrorist attacks. For example, the kidnapping tactic, which Hamas borrowed from Hezbollah under Syria's guidance and employed in the summer of 2006 with positive results in the form of the release of over

1,000 Palestinian terrorists from Israeli prisons, continues to be a critical weapon for Hamas. A major purpose of the Hamas terror tunnels on the Israel/Gaza border is to bring about another such kidnapping to use as a bargaining tool with Israel. Thus, the tactical know-how which Hamas gained while under Syrian protection is directly responsible for the Hamas terrorist attacks we see today. This is particularly obvious in the example of the Hamas kidnapping of the three teens in June 2014.

F. Conclusion

25. In summary, it is my expert opinion that despite the falling out between Hamas and Syria in 2012, the essential safe haven and support which Syria provided to the organization over the course of many years, solidified Hamas's organizational structure and transformed it into a leading terrorist organization with the sophistication needed to carry out complex terror attacks. As noted, this support took the form of unrestrained access to funding, weapons, travel, communications, military training, intelligence and strategy. The organizations terror operations since 2012, including the attacks it carried out in 2014, were made possible because of Syria's massive support for the organization from the early to mid-1990's through 2012.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.



Marius Deeb

--May 21st 2016-----

Date

EXHIBIT A

MARIUS K. DEEB

CURRICULM VITAE

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EDUCATION

D.Phil. in Politics (with special reference to the Middle East), Oxford University, Oxford, England. Worked on Egypt for doctoral dissertation, under the supervision of Professor Albert Hourani.

M.A. in Political Theory and International Relations, American University of Beirut, Beirut, Lebanon.

B.A. in Political Science, American University of Beirut, Beirut, Lebanon.

POSITIONS

Visiting/Adjunct Professor of Middle Eastern Studies teaching the courses on Islam at the School of Advanced International Studies, The Johns Hopkins University, Washington, D.C., 1996-

I have taught a total of 37 classes at SAIS as part of the Middle East Program. They included courses on Islam and Politics: Domestic and International, Islam and American Foreign Policy, Arab Political Thought and Practice, International Relations of the Middle East, Modern History of The Middle East and the Research Seminar on Modern Arab Politics.

This what Professor Ajami says about my teaching at the Middle East Program:

"I cannot thank you enough for your exquisite contributions this semester[Spring 2011]. Both your masterly discussion of Libya, and your discussion of history with Professor Herf were exceptional. We are blessed to have your wisdom and knowledge."

"It would be ideal for you and the program to teach my Arab Political Thought course, and you are the essential expert on this material. You know the Arab world as no one in Washington does; you know Lebanon and Syria and Egypt and Libya and the Peninsula as the palm of your hand. You know Arab liberalism and its defects."

Consultant on Islam for the Israeli and the Saudi Pavilions at the Walt Disney Epcot Millennium Village, May-August 1999.

Professorial Lecturer, George Washington University, Washington, D.C., 1989-2008

Senior Fellow, Center for International Development and Conflict Management, University of Maryland, College Park, Maryland, September 1985 - 1992.

Professorial Lecturer in History, Georgetown University, Washington, D.C., 1986-1988.

Visiting Professor and Visiting Scholar, Center for Contemporary Arab Studies, Georgetown University, Washington, D.C., September 1983 - 1986.

Assistant Professor, Civilization Studies Program, American University of Beirut. October 1980- September 1983.

Visiting Scholar, Center for Contemporary Arab Studies, Georgetown University, Washington, D.C., Summer, 1981.

Associate, Center for Arab and Middle East Studies, American University of Beirut, Beirut, Lebanon. October 1979-October 1980.

Visiting Senior Fellow, Near East Studies Department,
Princeton University, Princeton, New Jersey. September
1978 - June 1979.

Professional Research Associate, Arab Development
Institute, Tripoli, Libya. September 1977-August 1978.

Visiting Assistant Professor, Department of Political
Science, Kent State University, Kent, Ohio. September
1976 - July 1977.

Chairman, Middle East Studies Program, Kent State
University, Kent, Ohio. September 1976 - July 1977.

Visiting Assistant Professor, Department of Political
Science, Indiana University, Bloomington, Indiana.
August 1974 - May 1976.

Senior Associate Member, St. Antony's College, Oxford
University, England. May-August 1975.

Visiting Assistant Professor in Political Science,
Indiana State University, Terre Haute, Indiana,
September 1973 - July 1974.

Curriculum Consultant on Middle Eastern Studies
for the Indiana Consortium for International Programs,
Indiana. September 1973 - July 1974.

Assistant Professor in Politics, Faculty of Law and
Political Science, The Lebanese University,
Beirut, Lebanon. October 1972 - July 1973.

Consultant and Research Associate, The Ford
Foundation, Beirut, Lebanon. Worked on study conducted
by David and Audrey Smock: The Politics of Pluralism :
A Comparative Study of Lebanon and Ghana (New York,
Elsevier, 1975), 1972 -1973.

PUBLICATIONS/BOOKS

Syria, Iran and Hizbollah: The Unholy Alliance and Its War on Lebanon, Hoover Institution Press, Stanford University, Stanford, Californian, 2013.

Syria's Terrorist War On Lebanon and the Peace Process, New York: Palgrave, 2003, Paperback Edition, 2004.

"This is a major contribution to the study of inter-Arab politics, more generally, of contemporary Middle East politics. Professor Deeb presents a meticulously researched and argued assessment of Syria's policies in Lebanon, a subject on which he is a leading authority. The book's point of view will arouse considerable debate and controversy, thereby increasing its visibility and circulation. Years from now, this book will be cited as a landmark contribution in the field." Professor Naomi Weinberger

"Marius Deeb has written an authoritative, knowing book on the ways of dictatorship in Syria. It offers an unflinching analysis of the Syrian regime of Hafez Assad. Subtle, and superbly researched, it is the work of a historian who knows his way around the politics of the Arab world. A first-rate book." Professor Fouad Ajami

"Dear Marius:

I have been reading a whole bunch of Syrian material- naturally I was re-reading your book which I had read and so much enjoyed when it was in manuscript. Re-reading it I am just reminded of how good it is, how authoritative, and how brave it was given the standard received wisdom about Syria at the time. It is truly a superb book. I know I say so on the jacket of the book but this is even a new testimony. Almost everything I wanted to know about the regime I could find in your

pages. With best, Fouad.

Militant Islamic Movements in Lebanon: Origins, Social Basis, and Ideology. Occasional Papers Series, Center for Contemporary Arab Studies, Georgetown University, Washington, D.C. November 1986.

Libya Since The Revolution: Aspects of Social and Political Development. Co-authored with Mary-Jane Deeb, Praeger Publishers, New York, 1982.

The Lebanese Civil War .Praeger Publishers, New York, 1980. Foreword by Professor Charles Issawi.

Party Politics in Egypt : The Wafd and Its Rivals , 1919-1939. St. Antony's Middle East Monograph Series, No. 9, published for the Middle East Centre, St. Antony's College, Oxford, by Ithaca Press, London, 1979. Foreword by Professor Albert Hourani. The Arabic translation of this book has been published simultaneously in Cairo, Egypt and Beirut, Lebanon in 1987 under the title : Al-Siyasah al-Hizbiyah fi Misr : Al-Wafd wa Khusumahu 1919-1939.

ARTICLES

Eighty-four articles on "Egypt", "Iran", "Israel", "Jordan", "Lebanon", "The Middle East" and "Syria" in twelve volumes of The World Book Year Book, Chicago: World Book Inc., 2004-2015.

"In the Middle East, Oil Rules", SAISPHERE, pp.24-26, 2005

"Planting the Democracy Flag in the Middle East", SAISPHERE, pp. 24-27, 2007

"Arab Republic of Egypt" in The Government and Politics of the Middle East and North Africa, edited by David E. Long, Bernard Reich and Mark Gasiorowski, Sixth Edition, pp. 397-421, Boulder, Colorado: Westview Press, 2011.

"Syria and the War on Iraq" in Christian-Peter Hanelt, Giacomo Luciani and Felix Neugart, eds. Regime Change in Iraq: The Transatlantic and Regional Dimensions, Robert Schuman Centre for Advanced Studies, European University Institute, Italy, 2004.

Fourteen articles on "Egypt", and "Jordan" in Seven volumes of Encyclopaedia Britannica Book of the Year, Chicago and London: Encyclopaedia Britannica, 1997-2003.

"The West and Militant Islam: Is the Clash Inevitable?" in Bengt Sundelius (ed.), The Consequences of September 11: A Symposium on the Implications for the Study of International Relations, Stockholm: The Swedish Institute of International Affairs, 2002.

"Lebanon and the Arab-Israeli Conflict" in Joseph Ginat et al (eds.), The Middle East Peace Process: Vision Versus Reality, Norman, OK: University Press of Oklahoma, 2002.

"Lebanon since 1979: Syria, Hizballah and the War against Peace in the Middle East," in Robert O. Freedman, The Middle East Enters the 21st Century, Gainesville, FL: University Press of Florida, 2002.

"Sa'ad al-Din Ibrahim" in 2002 Britannica Book of the Year, Encyclopaedia Britannica, Chicago, London, p. 96.

"Nasr Hamid Abu Zayd" in 2001 Britannica Book of the Year, Encyclopaedia Britannica, Inc., Chicago, London, 2001.

"The Case of Saad Eldin Ibrahim : Egyptian Regime Shows its True Colors," The Washington Times, August 11, 2000, p. A19.

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"Syria," in Handbook of Political Science research on the Middle East and North Africa, Bernard Reich, ed., Greenwood Press, Westport, CT, London, 1998, pp. 206-213.

"Internal Negotiations in a Centralist Conflict: Lebanon," co-authored with Mary-Jane Deeb, in I. William Zartman (ed.), Elusive Peace: Negotiating an End to Civil Wars, The Brookings Institution, Washington, D.C. 1995, pp. 125-146.

"Militant Islam and Its Critics: The Case of Libya", in John Ruedy (ed.), Islamism and Secularism in North Africa, St. Martin's Press, New York, 1994, published in association with the Center for Contemporary Arab Studies, Georgetown University. pp. 187-197.

"Political Parties in Libya", in Frank Tachau, ed Encyclopedia of Political Parties in the Middle East, Greenwood Press, New York, 1994, pp. 369-379.

"Continuity in Egyptian History: The Wafd and the Muslim Brothers," in J. Spagnolo (ed.), Problems of the Modern Middle East : Essays in Honour of Albert Hourani, published for the Middle East Centre, St. Antony's College, Oxford, Ithaca Press, 1992.

"Regional Conflict and Regional Solutions : Lebanon," with Mary-Jane Deeb, in The Annals of the American Academy of Political and Social Science, No. 518, November 1991, pp. 82-94.

"Lebanon in the Aftermath of the Abrogation of the Israeli-Lebanese Accord: The Dominant Role of Syria", in Robert O. Freedman (ed.), The Middle East from the Iran-Contra Affair to the Intifada, Syracuse University Press, Syracuse, New York, 1991, pp. 323-340.

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"Michel `Awn," The Encyclopedia of World Biography, 20th Century Supplement, McGraw-Hill, New York, 1991, pp. 38-39.

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Contemporary Middle East and North Africa, Greenwood Press, New York, Westport, Connecticut, London, 1990, pp.453-460.

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"Syria," The Americana Annual 1986, Yearbook of the Encyclopedia Americana, Grolier, 1986, p. 497-498.

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"Large Landowners and Social Transformation in Egypt : 1940-1952," published in Land Tenure and Social Transformation in the Middle East, edited by Tarif Khalidi American University of Beirut, Beirut, 1984, 425-436.

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"Bank Misr and the Emergence of the Local Bourgeoisie in Egypt," Middle Eastern Studies, Vol.12, No. 3, 1976, pp. 69-86. Also published in The Middle Eastern Economy: Studies in Economics and Economic History, Elie Kedourie (ed.), Frank Cass & Co., London, 1977.

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BOOK REVIEWS

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Samir Khalaf, Civil and Uncivil Violence in Lebanon: A History of the Internationalization of Communal Conflict, Columbia University Press, New York, 2002, The Middle East Quarterly, Vol. 12, No. 4, Fall, 2005.

Maan Abu Nowar, The Jordanian-Israeli War 1948-1951: A History of the Hashemite Kingdom of Jordan, Ithaca Press, Garnet Publishing Limited, Reading, 2002, Middle East Studies Bulletin, Vol. 37, No. 2, December 2003, pp. 262-263.

Benny Morris, The Road to Jerusalem: Glubb Pasha, Palestine and the Jews, I.B.Tauris distributed by Palgrave Macmillan, London & New York, 2002, Middle East Studies Bulletin, December 2003, Vol. 37, No. 2, pp.272-273.

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Moshe Ma`oz, Asad, The Sphinx of Damascus, A Political Biography, Weidenfeld & Nicolson, New York, 1988,

Robert Bianchi, Unruly Corporatism, Associational Life in Twentieth-Century Egypt, Oxford University Press, New York and Oxford, 1989, International Journal of Middle East Studies Vol. 23, No. 4, November 1991, pp.640-641.

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Thomas W. Lippman, Egypt After Nasser, Sadat, Peace, and the Mirage of Prosperity, Paragon House, New York, 1989, The Middle East Journal, Vol. 45, No. 4, Autumn 1991, pp. 676-677.

Joseph P. Lorenz, Egypt and the Arabs, Foreign Policy and the Search for National Identity, Westview Press, Boulder, San Francisco & Oxford, 1990, The Middle East Journal, Vol.45, No.4, Autumn 1991, pp. 676-678.

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Robert Brenton Betts, The Druze, Yale University Press, New Haven and London, 1988, The Middle East Journal, Vol. 43, No.3, Summer 1989, p. 542.

John D. McIntyre, Jr., The Boycott of the Milner Mission: A Study in Egyptian Nationalism, Peter Lang, New York, 1985, International Journal of Middle East Studies Vol. 21, No. 2, May 1989, p. 264.

Thomas Philipp, The Syrians in Egypt 1725-1975, Franz Steiner Verlag Wiesbaden GMBH, Stuttgart, 1985, International Journal of Middle East Studies Vol. 21, No. 1, February 1989, pp. 145-146.

Martin Sicker, The Making of a Pariah State, the Adventurist Politics of Muammar Qaddafi, Praeger Publishers, New York, 1987, The Middle East Journal, Vol. 42, No. 4, Autumn 1988, pp. 696-697.

Jonathan Bearman, Qadhafi's Libya, Zed Books Ltd., London and New Jersey, 1986, The Middle East Journal, Vol. 41, No. 4, Autumn 1987, p. 628.

Maja Naur, Political Mobilization and Industry in Libya, Akademisk Forlag, Copenhagen, Denmark, 1986, The Middle East Journal, Vol. 41, No. 4, Autumn 1987, pp.627-628.

Samir Khalaf, Lebanon's Predicament, Columbia University Press, New York, 1987, International Journal of Comparative Sociology, Vol. 28, Nos. 3-4, 1987, pp. 247-248.

Raymond A. Hinnebusch, Egyptian Politics Under Sadat: The Post-Populist Development of an Authoritarian Modernizing State, Cambridge University Press, New York and Cambridge, 1985, The Middle East Journal, Vol. 40, No. 4, Autumn 1986, pp. 723-724.

Wadi D. Haddad, Lebanon: The Politics of Revolving Doors, Praeger Publishers, New York, 1985. Middle East Studies Association Bulletin, Vol. 20, No. 1, July 1986, pp. 79-80.

Adeed Dawisha (ed.), Islam in Foreign Policy, Cambridge University Press, New York, 1983, The Muslim World, vol. LXXV, Nos. 3-4, July-October 1985, pp. 191-192.

Cecil Hourani, An Unfinished Odyssey: Lebanon and Beyond, Weidenfeld and Nicolson, London, 1984, The Middle East Journal, Vol. 39, No. 2, Spring 1985, p. 374.

Eric Davis, Challenging Colonialism Bank Misr and Egyptian Industrialization, 1920-1941, Princeton University Press, Princeton, N.J., 1983, The Middle East Journal, Vol. 38, No. 1, Winter 1984, pp. 129-130.

Tareq Y. Ismael, The Arab Left, Syracuse University Press, Syracuse, New York, 1973, in The Journal of Politics, Vol. 40, No. 1, February 1978, p. 273.

G.M. Haddad, Revolution and Military Rule in the Middle East, Vol. 3, Robert Speller and Sons, New York, 1973, in International Journal of Middle East Studies, Vol. VI, No. 1, January 1975, pp. 120-121.

**CONFERENCE PAPERS
AND LECTURES**

Statement delivered at the Hearing before the Subcommittee of the Middle East and Central Asia of the Committee of the International Relations, House of Representatives, One Hundred and Ninth Congress, Syria Accountability and Lebanese Sovereignty Restoration Act Two Years later, Next Steps for U.S. Policy, July 7, 2006.

"The Significance of the Cedar Revolution: Lebanon and Beyond." A lecture delivered at the conference " Syria and Lebanon: What Next?" at the Center for Contemporary Arab Studies, Georgetown University, Washington DC, January 2006.

"How to Safeguard the Cedar Revolution" a statement at the Hearing before the Committee on International Relations, House of Representatives, One Hundred and Ninth Congress,

"Lebanon Reborn? Defining National Priorities and Prospects for Democratic Renewal in the Wake of March 14, 2005", July 28, 2005.

"Syria" A presentation at the conference "Opportunities and Challenges in U.S. Middle East Policy: Implications for U.S. Central Command Planning and Priorities", Washington D.C., May 25, 2005.

" Lebanon after the Hariri Assassination" A Policy Presentation, The Middle East Institute, Washington D.C. April 7, 2005.

"Can Syria Distance Itself from Terrorist Organizations?" Paper delivered at the conference on : "Syria: A Voice for the Future or a Voice of the Past?"

organized by the Foundation for the Defense of Democracies, at SAIS, the Johns Hopkins University, Washington DC, September 2003.

"Syria and the War on Iraq." Paper presented at the workshop on "Europe and the Middle East after the Iraq Crisis," organized by the Bertelsmann Foundation, Bologna, Italy, March 30- April 1, 2003.

"Southeast Asia in the Context of Global Islam." Lecture delivered at the conference on "Political Islam and Southeast Asia," at SAIS, the Johns Hopkins University, Washington, DC, March 2003.

"Islam," a lecture delivered at the Interfaith Symposium on "Judaism, Christianity and Islam: Evil in our Traditions." Emanu-El Synagogue, New York, January 2003.

"Religious Roots of Terrorism," paper presented at the National Security Agency, Laurel, MD, September, 2002.

"The West and Islam after September 11: Is the Clash Inevitable?" at a conference on "International Politics: The Research Agenda after September 11" organized by the Swedish Institute of International Affairs, Stockholm, Sweden, April 2002.

"Islamic Fundamentalism and Terrorism" presentation given at a conference on "Dynamics of Islamic Politics", at the National Intelligence Council (NIC) Project Conference at the University of Maryland, College Park, February , 2002.

Participated as an expert scholar to a four day congressional conference for 9 senators and 15 congressmen on "Islam, Terrorism and the US Response" organized by the Aspen Institute, in Punta Mita, Mexico, January 2002.

"Islam and Politics," presentation to the Pew International Journalism Program of the Paul Nitze School of Advanced International Studies, the Johns Hopkins University, Washington DC, January 2002.

"Why Bin Laden?" presentation at the Applied Physics Laboratory, Johns Hopkins University, Laurel, MD, November 2001.

"Lebanon, Syria and the US," at a conference sponsored by the Office of Near Eastern, South Asian and African Analysis of the CIA, at the Hilton Hotel, McLean, VA, May 2001.

"International Issues Facing the New Administration: the Middle East", speaker at the Smithsonian World Affairs Institute, Washington DC, April, 2001.

"Hizballah", presentation on a panel on terrorism, sponsored by the International Center for Terrorism Studies at the Potomac Institute for Policy Studies, Arlington, VA, October 2000.

"The Syrian and Lebanese Dimensions of the Peace Process," paper presented at the conference on The Peace Process in the Middle East, at the University of Haifa, Israel, March 14, 2000.

"The Political History of Morocco," presentation at the National Council on U.S.-Arab Relations, Washington, D.C., June 3, 1999.

"Terrorism in the Middle East," paper presented at the conference on The Emergence of Democracy and the Globalization of Crime, Connecticut State University, New Britain, CT, May 1-2, 1999.

"Egypt: Foreign Policy and Domestic Politics," presentation at the U.S. National Security Agency, Maryland, April 18, 1999.

"The Arab Countries and Israel's 1999 Elections", presentation at the School of Advanced International Studies' Foreign Policy Institute, the Johns Hopkins University, Washington, D.C., April 8, 1999.

"The Syrian Rule in Lebanon," presentation at the Foreign Service Institute, Department of State,

Arlington, VA, January 26, 1999.

"Israel, Palestine and the Peace Process: Prospects for Peace," presentation before the World Affairs Council of Pittsburgh, PA, October 23, 1998.

"The Role of Hizballah in Lebanon," paper presented on panel briefing U.S. Ambassador to Lebanon, David Satterfield, Department of State, Washington, D.C., August 1998.

"Syria and the Peace Process," lecture given at the National Council on U.S. Arab Relations, Washington, D.C., June 6, 1998.

"Lebanon and Syria," lecture given at the Foreign Service Institute, Department of State, Arlington, VA, January 6, 1998.

"Whither Hizballah?" presentation at the Defense Intelligence Agency, Department of Defense, Washington, D.C., February 26, 1997.

"On the Clash of Civilizations," presentation in the lecture series on Islam and International Politics, at the Smithsonian Institute, Washington, D.C., January 30, 1997.

"Syria and the Rule of Hafez Asad," presentation at the Foreign Service Institute, Department of State, Arlington, VA, March 12, 1996.

"Whither Asad's Syria ? Internal Dynamics and the Peace Process " paper presented at the 49th annual conference entitled "Middle East Uncertainties" Washington, D.C., September 29-30, 1995.

"The Power of the Powerless : Civil Society in Lebanon paper presented at the conference entitled " Civil Society in the Middle East : An Opportunity or a Challenge to Existing Regimes ? " McLean, Virginia, May 24-25, 1995

"Some Comments on Secular Leftist Political Parties in

the Middle East and North Africa " in the Woodrow Wilson Center's conference entitled "Between the State and Islam", Washington D.C., February 25-26, 1994.

"Will the Ta'if Agreement Endure?" Paper presented at a Conference on "Prospects for Lebanon's Postwar Stability, McLean, Virginia, September 30, 1993.

"Syria and Iraq: the New Generation of Leadership," paper presented at the Workshop on Middle East Politics: The New Generation of Leadership in the Middle East, hosted by the Joint Military Intelligence College, Newport, Rhode Island, September 21-22, 1993.

"Syria, Lebanon and Jordan: Social and Political Underpinnings and the Dynamics of Relationships," lecture given at the Foreign Service Institute, Department of State, Arlington, Virginia, July 13, 1993.

"The Syrian Military and the Biqa' Valley Drug Trade," paper presented at a Conference on Drug Trafficking in the Middle East and North Africa, International Meridian House, Washington D.C., February 19, 1993.

"Lebanon and Syria: Internal Dynamics and Regional Politics," lecture given at the Foreign Service Institute, Department of State, Arlington, Virginia, January 19, 1993.

"The Contemporary Political and Social Developments in the Maghrib," lecture given at the Fullbright-Hayes North Africa Seminar, AMIDEAST, Washington D.C., June 23, 1992.

"Lebanon in the Aftermath of the Ta'if Agreement," lecture given at the Foreign Service Institute, Department of State, Arlington, Virginia, April 28, 1992.

"The Libyan-Chadian Relations," lecture given at the Foreign Service Institute, the Department of State, Arlington, Virginia, March 19, 1992.

"The Arab-Israeli Conflict and the Missed Opportunities Will the Future Resemble the Past?" A Panel sponsored by the Jewish Community Council of Greater Washington and George Washington University, Washington, D.C., February 11, 1992.

"Democratization in the Arab World," Johns Hopkins Foreign Policy Institute, SAIS, Washington D.C., December 5, 1991, and January 30, 1992,

"Syria and the Persian Gulf Crisis : Rhetoric and Realpolitik, " Middle East Studies Association Annual Meeting, Washington, D.C., November 24, 1991.

"Popular Participation in the Arab Levant and Egypt," paper given at the conference on Popular Participation in Arab Politics : Present Challenges and Future Prospects, held in Washington, D.C. November 7, 1991

"Democratization in the Middle East and North Africa, "Voice of America Symposium, Washington, D.C., September 27, 1991.

"International and Regional Mediation in the Levant," paper given at the American Political Science Association Annual Meeting, Washington, D.C. August 29-September 1, 1991.

"The Ta'if Accord and Its Implications," lecture given at the Conference on Lebanon, American Task Force for Lebanon, Washington D.C. June 27, 1991.

"Libya and Its Regional Policies," lecture given at the Foreign Service Institute, Department of State, Arlington, Virginia, May 7, 1991.

"The Middle East and the New World Order," lecture given at East Tennessee State University, Johnson City, Tennessee, April 28, 1991.

"Lebanon After `Awn : A New Pax Syriana?" a lecture given at The Middle East Institute, Washington, D.C., December 10, 1990.

"Qadhdhafi's Volte-face in his Foreign Policy toward the Arab World," paper presented at the 24th Annual Conference of the Middle East Studies Association of North America, San Antonio, Texas, November 10-13, 1990.

"Libya in the Post-Cold War Era : Changes in Domestic Politics and Foreign Policy," lecture given at the Foreign Service Institute, Department of State, Arlington, Virginia, October 23, 1990.

"Negotiations and Attempts at Conflict Resolution : The Case of Lebanon," (with Mary-Jane Deeb) paper presented at the Conference on Internal Security Negotiations at the Paul Nitze School of Advanced International Studies, The Johns Hopkins University, March 12, 1990.

"A Comparison of Basic Freedoms under Mubarak and the Wafdist Cabinet of 1950-52," paper presented at the Twenty-Third Annual Meeting of the Middle East Studies Association of North America, Toronto, Canada, November 17, 1989.

"Prospects for Peace in the Middle East," paper presented for a panel on the Arab-Israeli Conflict, George Washington University, Washington, D.C., April 18, 1989.

"An Analysis of Recent Political Developments in Lebanon," Lecture given at the Foreign Service Institute, Department of State, Arlington, Virginia, March 7, 1989.

"The Role of Syria in the Lebanese Conflict," paper given at the Seminar entitled "Lebanon at the Crossroads," sponsored by the Lebanese Peace Institute, held at UCLA, Los Angeles, January 21, 1989.

"The Attitude of the Egyptian Muslim Brothers towards the Public and Private Sectors of the Economy," paper presented at the Twenty-Second Annual Conference of the Middle East Studies Association of North America, Los Angeles, November 1988.

"The Crisis of the Presidency in Lebanon," Paper presented at the Parliament Hill Confederation Hall, in Ottawa, Canada, sponsored by the Ottawa Friends of Lebanon and the International Development Committee of the Ottawa YM-YWCA, September 26, 1988.

"The Syrian Role in Lebanon," a paper delivered at the Symposium entitled "Lebanon: A Question of Peace," held at the Middle East Institute, Washington, D.C., September 15, 1988.

"The Regional Dimensions of the Conflict in Lebanon: The Presidential Elections and Beyond," Department of State, Washington, D.C., August 26, 1988.

"The Syrian Strategy in Lebanon on the Eve of the Presidential Elections," Symposium on Lebanon, CIDCM, University of Maryland, July 26, 1988.

"The North African Novel as an Expression of the Tensions of Modernization," Lecture given at the Foreign Service Institute, Department of State, Arlington, Virginia, June 28, 1988.

"Lebanon and Israel," paper read at the Association for Israel Studies Annual Conference, New York, June 6-7, 1988.

"Whither Lebanon 1988?" Lecture delivered at the Foreign Service Institute, Department of State, Arlington, Virginia, May 31, 1988.

"Lebanon," paper presented at the Conference on the Middle East After Iran-gate Crisis, Baltimore Hebrew University, Baltimore, MD, May 8, 1988.

"The Arab Middle East," paper delivered at the Conference on Middle Eastern Fundamentalism and Terrorism, Washington, D.C., April 21-22, 1988.

"Islamic Fundamentalism," paper read at the Symposium on Ethno-geographical Fundamentalism : The Middle East, The Capital American Social Psychological Association

Meeting, Washington, D.C., March 26, 1988.

"State-Sponsored Terrorism," paper read at the Inter-Institutional Conference on Terrorism Research : The State of the Art, Washington, D.C. January 19, 1988.

"Shi`i Political Leadership in Lebanon," Middle East Studies Association of North America 21st Annual Meeting , Baltimore, MD, November 14-17, 1987.

"The Islamic Right in Egypt," Middle East Studies Association of North America, 21st Annual Meeting, Baltimore, MD, November 14-17, 1987.

"Egypt in the Mubarak Era : the Role of Political Parties," Philips Lecture, Center for International Development and Conflict Management, The University of Maryland, College Park, MD, November 19, 1987.

"Hizballah," lecture delivered at the School of Advanced International Studies, Johns Hopkins University , October 29, 1987.

"Lebanon," a statement read and submitted to the Senate Appropriations Sub-Committee on Foreign Operations, July 30, 1987.

"Syria's Policy toward the Peace Process and the PLO," paper given at the International Strategic Studies Association, 'Strategy '87,' Washington, D.C., July 13-16, 1987.

"Islamic Movements in Lebanon," a lecture delivered at Johns Hopkins University, Homewood Campus, April 21, 1987.

"Syria's Role in Regional Conflicts: Some Theoretical Implications," presented at the 28th Annual Convention of the International Studies Association, Washington, D.C., April 14-17, 1987.

"The Nature of the Asad Regime in Syria," paper presented at the Defense Intelligence College roundtable sponsored by the Defense Academic Research Support

Program (DARSP), March 18, 1987.

"The New Wafd Party and the Democratic Alternative in Egypt," The Brookings Institution and University of Maryland, Washington, D.C., December 15, 1986.

"Lebanon: Flashpoint for Middle East War?" Friends Committee on National Legislation, Washington, D.C., December 4, 1986.

"Syria's Role in Regional Conflicts," paper given at the 20th Annual Meeting of the Middle East Studies Association of North America, Boston, November 22, 1986.

"Islamic Fundamentalism in Lebanon and the Arab World," lecture given at the Industrial College of the Armed Forces, National Defense University, October 15, 1986.

"Islamic Fundamentalism in Tunisia," lecture delivered at the conference held on the 25th Anniversary of the Peace Corps, Washington, D.C., September 20, 1986.

"Syria and the Peace Process," paper given at the 82nd Annual Meeting of the American Political Science Association, Washington, D.C., August 28, 1986.

"Libya and the Arab World after the U.S. Raid," paper delivered at the International Strategic Studies Association, Washington, D.C., May 15, 1986.

"Militant Islamic Movements and Pluralism in Lebanon," paper delivered at the Symposium on the Arab World and the Islamic Resurgence at the University of Massachusetts, Amherst, Massachusetts, April 18, 1986.

"Libya: Domestic and Regional Politics," lecture given at the Foreign Service Institute, Department of State, Arlington, Virginia, March 11, 1986.

"Islamic Resurgence in Lebanon," paper delivered at the symposium on International Perspectives on the Religious Resurgence in the Middle East at Yale University, New Haven, Connecticut, February 28, 1986.

"Prospects for National Reconciliation in Lebanon," Tulane University, New Orleans, Louisiana, February 1, 1986.

"Syrian-Lebanese Relations Since 1975," paper given at the Middle East Association of North America, in New Orleans, November 25, 1985.

"Islamic Movements and the Role of Syria in Lebanon," lecture delivered at the National Defense University, Washington, D.C., September 27, 1985.

"The Role of the Military and the Middle Class in the Opposition to the Qadhdhafi Regime," paper delivered at the State Department, Washington, D.C., September 23, 1985.

"Militant Islamic Movements in Lebanon: Shi'i and Sunni Variants," lecture delivered at the School of Advanced International Studies, Johns Hopkins University, September 18, 1985.

"Regional Political Developments and their Implication for the Future of Lebanon," Conference on the Reconstruction of the Lebanese Economy: Plans for Recovery, sponsored by the Center for International Development and Conflict Management, the University of Maryland, July 22-23, 1985.

"The Balance of Power in the Arab World Since 1982," Strategy 85 Conference, Washington, D.C., June 25-27 1985.

"Hizballah (Party of God): Origins, Social Basis and Ideology," at the American Council for the Study of Islamic Societies Meeting, May 30-31, 1985, Villanova University.

"The Libyan Opposition," in a panel on Libya, sponsored by the Middle East Institute, Washington, D.C., February 26, 1985.

"The Return of the New Wafd and the Future of the Multiparty System in Egypt," Middle East Studies

Association of North America, The Eighteenth Annual Meeting, November 28 - December 1, 1984, San Francisco, California.

"Saudi Arabian policy toward Lebanon since 1975." Ninth Annual Symposium, Center for Contemporary Arab Studies, Georgetown University, Washington, D.C., April 12-13, 1984.

"Syria's Objectives in Lebanon," a lecture given at Yale University, February 17, 1984, New Haven, Connecticut.

"Syria's Role in Lebanon in the Context of Inter-Arab Politics," a lecture given at the Woodrow Wilson International Center for Scholars, Washington, D.C., December 19, 1983.

"The Ascendancy of the West in the Middle East," a lecture given at the School of Advanced International Studies, Johns Hopkins University, Washington, D.C., October 4, 1983.

"The Response of Egyptian Large Landowners to British Economic Interests, 1907-1939," presented at the conference on Egypt, 1882-1914: Occupation and Response, sponsored by the American University of Beirut, Beirut, Lebanon, May 1982.

"The Camp David Summit: Its Significance and Implications," Pi Sigma Alpha Lecturer, Kent State University, Kent, Ohio, November 1978.

"The Social Basis of Parliamentary Democracy in Modern Egypt," presented at the Middle East Studies Association, Tenth Annual Meeting, Los Angeles, California, November 1976.

"Conflict in Lebanon," presented at the Forum on Lebanon, Center for Middle Eastern Studies, University of Chicago, February 1976.

"Some Major Causes of the Present Lebanese Crisis," presented at the Middle East Studies Association, Ninth Annual Meeting, Louisville, Kentucky, November 1975.

"Oil Politics and Conflict in the Middle East," presented at the International Studies Association, Mid-West, Chicago, November 1974.

MEDIA ACTIVITIES

More than 1000 interviews on TV networks, Radio networks and quotations in the printed press. The list includes NBC Nightly News, ABC Nightline, CNN News, INN TV, CTV, Toronto, Canada, CBC, Toronto, Canada, Christian Science Monitor T.V., Independent Television News (ITN) London, Panorama Metromedia 5, Washington, D.C., BBC, London, England, National Public Radio, ABC News Radio Network, UPI Radio, Associated Press Radio, Christian Science Monitor Radio Service, World Service of the Christian Science Monitor, Pacific Radio Network, Berkeley California, CKO Radio Network, Toronto, Canada, Voice of America (VOA), and the French Monte Carlo Radio.

The Washington Post, The Los Angeles Times, The Christian Science Monitor, The Boston Globe, The Washington Times, Philadelphia Daily News, Baltimore Jewish Times, Detroit Free Press, Seattle Times, USA Today, Insight Magazine, The Sun (Baltimore), People Weekly, St. Louis Dispatch, Die Woche (Germany).

EXHIBIT 1

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

-----x

SHMUEL ELIMELECH BRAUN, *et al.*,

Plaintiffs,

Civ. No. 15-01136 (BAH)

v.

THE ISLAMIC REPUBLIC OF IRAN, *et al.*,

Defendants.

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DECLARATION OF PATRICK L. CLAWSON

I, Patrick L. Clawson, PhD, of the city of Washington in the District of Columbia, this 23rd day of May, 2016, declare pursuant to 28 U.S.C. § 1746 subject to penalties of perjury, as follows:

A. Professional Background

1. I am an expert on the Islamic Republic of Iran (“Iran”) and have extensively studied and researched Iran and its sponsorship of terrorism, its economy, and its politics. This affidavit is submitted to provide the Court with facts and evidence concerning Iran’s funding of Hamas in the summer and fall of 2014.

2. I am the Director of Research at the Washington Institute for Near East Policy (“The Washington Institute”), where I have been employed since 1997. My previous positions include five years as senior research professor at the Institute for National Strategic Studies of the National Defense University and senior economist for four years each at the Foreign Policy Research Institute, the World Bank, and the International Monetary Fund. Most of my

professional life has been spent studying the Middle East, in particular, Iran. My first scholarly article on the Middle East was published approximately thirty-five years ago, and my first work on the region for the Central Intelligence Agency was approximately twenty-five years ago.

3. The Washington Institute is a think tank, in other words, a 501(c)(3) organization, which receives funding from a variety of individuals, all of whom are American, to conduct studies about U.S. foreign policy interests and concerns in the Middle East. As part of that work, the Washington Institute studies domestic and international issues relating to the Iranian government. My work includes extensive research regarding the Iranian Ministry of Intelligence and Security (“MOIS”), the Iranian Revolutionary Guard Corps (the “IRGC”) and its Qods Division (“IRGC Qods”) and the Iranian financial and banking system.

4. As Director of Research at The Washington Institute, my duties include, *inter alia*, supervising a staff of about twenty senior researchers who study Middle East politics and terrorism, with considerable focus on Iran. Some of these researchers are well known for their expertise in the Middle East. For example, I have worked with Dennis Ross, President Clinton's Middle East Envoy and chief peace negotiator from 1993-2000 and President Obama's Special Assistant to the President and Senior Director of the Central Region (covering the Middle East) at the National Security Council from 2009-2013. I have also worked with former Deputy Assistant Secretary of the Treasury for Intelligence Matthew Levitt, responsible, *inter alia*, for following Iranian terror financing; and former Deputy Assistant Secretary of State, Scott Carpenter, who worked on Middle East reform programs. Under my supervision, the Washington Institute's researchers have written more than twenty studies about Iran's security apparatus, support for terrorism including terror financing, political leadership, and U.S. and Western policies to counter Iranian terrorism and terror financing. I also regularly brief and receive

briefings from senior United States military officials and senior officials of other governments friendly to the United States, about the threats from Iran, Iranian support of terrorism and Iranian strategy regarding terrorism.

5. Over the last twenty-nine years, I have done contract consulting work on Iran for several U.S. government agencies, including the Central Intelligence Agency, the Defense Department, the State Department Bureau of Intelligence and Research, and through various contractors, the National Security Agency and the Defense Intelligence Agency. While at the National Defense University, I worked closely with officials from a wide range of U.S. government agencies on the issue of Iran and Iranian support for terrorism, including close work with the Central Command (the U.S. military command responsible for the Middle East) and its subordinate commands, and with the staff of the Joint Chiefs of Staff.

6. I have previously been designated and qualified by federal courts as an expert witness on issues relating to Iran, Iran's support for terrorism, its economy and other issues, and have given both live and written testimony in various cases brought against Iran for its sponsorship of terrorism, including *Cicippio v. Islamic Republic of Iran*, 18 F. Supp.2d 62, 68 (D. D.C. 1998); *Flatow v. Islamic Republic of Iran*, 999 F. Supp. 1, 8-9 (D.D.C. 1998); *Cronin v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 99-02890 (1999); *Higgins v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 99-00377 (1999); *Stehem v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 00-00159 (2000); *Hegna v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 00-00716 (2000); *Anderson v. Islamic Republic of Iran*, 90 F. Supp. 2d 107, 112-113 (D.D.C. 2000); *Eisenfeld v. Islamic Republic of Iran*, 172 F. Supp. 2d 1, 5 (D.D.C. 2000); *Elahi v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 99-02802 (1999); *Wagner v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 00-017999; *Polhill v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 00-01798 (2000); *Mousa v.*

Islamic Republic of Iran, 238 F. Supp. 2d 1, 3-4 (D.D.C. 2001); *Raffi v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 01-850 (2001); *Kerr v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 01-01994 (2001); *Surette v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 01-00570 (2001); *Weinstein v. Islamic Republic of Iran*, 184 F. Supp. 2d 13, 19 (D.D.C. 2002); *Ungar v. Islamic Republic of Iran*, 271 F. Supp. 2d 91, 93 (D.D.C. 2002); *Stern v. Islamic Republic of Iran*, 271 F. Supp. 2d 286, 288 (D.D.C. 2003); *Rieger v. Islamic Republic of Iran*, 281 F. Supp. 2d 87, 90 (D.D.C. 2003); *Campuzano v. Islamic Republic of Iran*, 281 F. Supp. 2d 258, 262 (D.D.C. 2003); *Greenbaum v. Islamic Republic of Iran*, No. 02-2148, 2006 WL 2374221 at * 3 (D.D.C. Aug. 10, 2006); *Levin v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 05-2494 (2007); *Owens v. Republic of Sudan*, et al., No. 01-2244, 2011 U.S. Dist. LEXIS 135961 (D.D.C. Nov. 28, 2011); *In Re Terrorist Attacks on September 11, 2001*, No. 03-MDL-1570 (S.D.N.Y. Dec. 22, 2011), among others.

7. I have also testified before the House International Relations, National Security, and Banking and Financial Services Committees and the Senate Foreign Relations and Banking Committees about Iran, Iranian terrorism, and the use of economic measures to discourage Iran from supporting terrorism.

8. I have made presentations about the foreign and economic policy of Iran, including its support for terrorism, and about U.S. policy towards Iran at conferences sponsored by, amongst other organizations, the Iranian Foreign Ministry's Institute for Political and International Studies in Tehran, Iran, the Royal Institute for International Affairs in London, UK, the Royal United Services Institute in London, UK, the Japanese Foreign Ministry in Tokyo, Japan, the Institute for Defense Studies and Analysis in New Delhi, India, the Shanghai Institute for International Studies in Shanghai, China, the Jaffee Center of Tel Aviv University in Tel

Aviv, Israel, the Council for Foreign Relations in New York City, New York, the Nixon Center (part of the Nixon Presidential Library) and the Carnegie Endowment for International Peace in Washington, D.C., and a great many universities. I have given presentations concerning Iran at more than 200 symposiums in more than twenty countries.

9. My books and monographs include: *How Iranians Might React to a Nuclear Deal* (The Washington Institute, 2014, with Mehdi Khalaji), *An Iranian Nuclear Outbreak is Not Inevitable* (The Washington Institute, 2011), *The Red Line: How to Assess Progress in U.S. Iran Policy* (The Washington Institute, 2010); *The Perfect Handshake with Iran: Prudent Military Strategy and Pragmatic Policy* (The Washington Institute, 2010); *Much Traction from Measured Steps: The Iranian Opposition, the Nuclear Issue, and the West* (The Washington Institute, 2010); *Engaging Iran: Lessons from the Past* (The Washington Institute for Near East Policy, 2009, edited); *The Last Resort: Consequences of Preventative Military Action Against Iran* (The Washington Institute, 2008, with Michael Eisenstadt); *Eternal Iran: Continuity and Chaos* (Palgrave Press, 2005, with Michael Rubin); *Getting Ready for a Nuclear-Ready Iran* (U.S. Army War College, 2005, with Henry Sokolski, edited); *Checking Iran's Nuclear Ambitions* (U.S. Army War College, 2004, with Henry Sokolski, edited); *Iran Under Khatami* (The Washington Institute for Near East Policy, 1998, with others); *Strategic Assessment*, (the flagship annual report of the Institute for National Strategic Studies of the National Defense University, which I inaugurated and edited for three years, 1995-1997); *U.S. Sanctions on Iran* (Emirates Centre for Strategic Studies and Research, 1997); *Business as Usual? Western Policy Options Towards Iran* (American Jewish Committee 1995); *Energy Security in the Twenty-First Century* (National Defense University Press, 1995, edited) ; *Iran's Strategic Intentions and Capabilities* (National Defense University Press, 1994, edited); and *Iran's Challenge to the*

West: How, When, and Why (the Washington Institute for Near East Policy, 1993). The book I co-authored with Rudi Matthee and Willem Floor, *The Monetary History of Iran: From the Safavids to the Qajars*, was awarded the Houshang Pourshariati Iranian Studies Book Award for the best book about Iran in 2014 from the Middle East Studies Association, the organization of U.S. scholars studying the Middle East.

10. In addition, I have written about the contemporary Middle East, including about Iran, for a variety of news publications, including *The New Republic*, *The New York Times*, *Wall Street Journal* and *Washington Post*. I have also authored more than forty scholarly articles for academic publications, such as *Foreign Affairs*, *Survival*, *Washington Quarterly*, *International Journal of Middle East Studies*, *Middle East Journal*, *Les Cahiers de l'Orient* and *Oxford Bulletin of Economics and Statistics*.

11. From 1995 to 2012, I was senior editor of *Middle East Quarterly*, a journal of Middle Eastern affairs, which regularly publishes on Iranian politics and Iran's foreign policy. From 1990 through 1994, I was editor of *Orbis*, a foreign policy journal.

12. I hold a Ph.D. in economics from the New School for Social Research and a B.A. from Oberlin College.

13. I am able to read and/or speak Persian and French as well as some Hebrew, Spanish, and German. I read the Iranian press regularly through the internet. I also read other publications from Iran, including books in Persian.

14. A copy of my CV is attached hereto as Exhibit A

B. Nature of This Expert Witness Report

15. I have been asked by counsel for plaintiffs in the case of *Braun, et al. v. The Islamic Republic of Iran, et al.* to provide my professional opinion as to whether Iran financed

and supported Hamas in the 2014 time period. I have reviewed the complaint filed by the Fraenkel plaintiffs.

16. My knowledge of Iran's sponsorship of terrorism comes as a result of my routine and in-depth access to facts concerning Iran, its support of terrorism, its economy and politics and my extensive study of Iran as outlined herein, including my professional research and publishing in this field over the course of many years. Indeed, as part of my work, I spend at least one hour a day reviewing writings, including online sources, relating to Iran and other nations that sponsor terrorism. Iran is a relatively open information country in which the competing political forces frequently reveal information about the country's security apparatus and debate issues relating to terrorism. Iran even has many internet sites that publish information on these subjects. From my years studying Iranian politics and given the competing sources that can be compared, I believe that I am able to determine whether Iranian reports on these subjects are credible. Indeed, I use this information as a source to brief the United States and other governments. Furthermore, Iran and some of the terrorist groups it sponsors have been openly boastful about their relations, and have described and detailed their connections in print.

17. My opinions set forth below are based upon my education, research, and experience as well as my review and analysis of documents and sources typically relied upon by experts in my field. Such documents and sources include, but are not limited to: official speeches made by Iranian officials, U.S. officials, and the officials of other countries, my conversations with U.S. officials, former Iranian officials, and officials of other countries; and my review and analysis of relevant documents, including newspaper accounts (in both the English-language press and Persian language press).

C. The Iranian Regime

18. In 1979, the Islamic Republic of Iran came to power both through a popular revolution and then through a series of referenda. This government replaced the previous regime, which was headed by Shah Mohammad Reza Pahlavi. From the beginning, the Islamic Republic of Iran's political and religious institutions were overseen by a single person, a religious leader who is called "the Supreme Leader." The Iranian Constitution provides that the Supreme Leader has the authority to dismiss the Iranian President, overrule the parliament and the courts, and overrule any secular law. In addition, the Supreme Leader is imbued by the religious community with the authority to overrule any religious law if necessary for the "expediency of the system." Indeed, under the Constitution, the Supreme Leader appoints an Expediency Council to advise and assist him in overriding any law, civil or religious, which is found inexpedient.

19. At the time of the 1979 revolution, Ayatollah Ruhollah Khomeinei was the Supreme Leader. Currently, the Supreme Leader is Ayatollah Ali Khamenei. He is the only person, other than Ayatollah Khomeinei, ever to hold the title of Supreme Leader. The Supreme Leader is not popularly elected. He is chosen by an "Assembly of Experts," the members of which, in theory, are popularly elected. In fact, however, all candidates for the Assembly of Experts must be approved by the previous Supreme Leader. That makes the selection of the Supreme Leader rather like the election of a Pope by the College of Cardinals.

20. The Islamic Republic of Iran's political structure is bifurcated into two aspects: a formal governmental structure and a revolutionary structure. The Supreme Leader oversees both aspects. Iran's President is subordinate to the Supreme Leader, but otherwise leads Iran's formal governmental structure. The Supreme Leader oversees the revolutionary structure, which

includes entities, some of which are described herein, that are parallel to the traditional government agencies within the formal government structure. For example, the Iranian Revolutionary Guard Corps (IRGC) is parallel to the regular military of Iran. There are revolutionary courts that are parallel to the regular courts of Iran. However, in each case, the revolutionary institution is the more powerful of the pair.

D. The Iranian Ministry of Intelligence and Security (MOIS)

21. MOIS, Iran's foreign and domestic intelligence service, is one of the principal organizations Iran has used to carry out its terrorist support activities. MOIS is the successor agency to the respected spy agency called SAVAK, run by the Shah. After the 1979 revolution, that organization was not disbanded, but maintained in a secret manner, and then formed as a ministry openly (MOIS) several years after the 1979 revolution. MOIS at one point had approximately 30,000 employees, making it the largest intelligence agency in the Middle East, and was considered in effectiveness second only to Israeli intelligence. Credible reports estimated its annual budget in the late 1990s to have been approximately between \$100 and \$400 million dollars.

22. These conclusions are based on: (1) the findings in the German so-called Mykonos criminal court case (named for a murder which took place at a restaurant in Berlin called the Mykonos), which involved murders carried out in Berlin and organized by MOIS at the instructions of senior Iranian government officials, and included testimony from a defector who had been a top official in MOIS; and (2) the information which emerged in Iran in 1999/2000, largely as leaks from an official government investigation about activities of MOIS and other parts of the Iranian intelligence apparatus in reaction to assassinations of dissidents in Iran. During the course of that investigation, Iran's president (Mohammed Khatami) complained

he had no control over MOIS, with the Minister being appointed at the direction of the Supreme Leader.

23. For some years, MOIS's role appears to have been downgraded as the IRGC took over more and more functions. Indeed, since the disputed presidential election in 2009 led to a considerable expansion in the IRGC's intelligence arm, that organization appeared to be eclipsing MOIS's role. However, after some serious operational missteps by the IRGC and IRGC/Qods in 2011-2012 – including getting caught red-handed at botched terror attacks in the United States (the planned attack on the Saudi Ambassador to the United States to which Mansour Arbabsiar pleaded guilty in federal court), India, Azerbaijan, Bulgaria, Cyprus, and Malaysia, among other places – MOIS appears to have made something of a comeback.

24. U.S. Department of State reports have frequently referred to Iranian intelligence services role in facilitating terrorist attacks, at a time when the only Iranian intelligence service of any size was MOIS. In "Patterns of Global Terrorism 1990," the State Department wrote that, "Iran has used its intelligence services extensively to facilitate and conduct terrorist attacks Intelligence officers have used the diplomatic pouch for conveyance of weapons and finances for terrorist groups." United States Department of State, Office of the Coordinator for Counterterrorism, Patterns of Global Terrorism 1990, (Apr. 29, 1991).

25. In providing support to Hamas and other terrorist groups, MOIS is acting as a ministry of the Iranian government whose activities are tightly and carefully controlled by the Iranian government through the Supreme Leader and his representatives. In sum, the terrorism training provided to Hamas and other terrorist groups by MOIS is an official policy of the Iranian government.

E. Iran's Use of Ostensibly Charitable Foundations as Fronts to Conceal its Activities

26. As part of its revolutionary system parallel to ordinary state institutions, Iran has a number of large “foundations” which control extensive assets. In 2013, Judge Forrest of the U.S. District Court for the Southern District of New York found in *In re 650 Fifth Avenue and Related Properties (Alavi-Assa)*¹ that the Alavi Foundation of New York was controlled by one of these foundations in Iran which in turn was under the control of the Iranian government; that was the basis for seizing the Alavi Foundation of New York's assets, including the office building at 650 Fifth Avenue reported by the New York Times to be worth about \$800 million.

27. Another such Iranian foundation is the Martyr's Foundation to use its original name; it has gone through several name changes and mergers, with the current name being the Martyrs and Self-Sacrificers (*i.e.*, war-wounded) Foundation. The director of this Foundation is appointed by the Supreme Leader, and the organization appears to be largely funded by direct grant from the Iranian government (I am not aware of any financial statement available). In his book, *The Pasdaran: Inside Iran's Islamic Revolutionary Guard Corps*, noted scholar of Iran's IRGC Emanuele Ottolenghi describes the Martyrs Foundation as being controlled by the IRGC: “The IRGC indirectly controls two economic conglomerates that are unique to Iran's revolutionary structures: the Foundation of the Oppressed of the Earth (Bonyad-e Mostazafan) and the Foundation of Martyrs and Veterans' Affairs (Bonyad-e Shahid va-Omur-e-Janbazan) [its name at the time of this 2011 book]... The Foundation for Martyrs' and Veteran Affairs [is] currently headed by former IRGC Air Force commander Hossein Dehghan. The Foundation acts as a mortgage lender to Basijis' and martyrs' families, and as an influential stakeholder in Iran's economy.”

¹ 2013 WL 5178677 (S.D.N.Y. Sept. 16, 2013)

28. Reports appear in the Iranian press about senior officials from the Martyr's Foundation visiting Lebanon, with the implication being that the Foundation continues to be active there. The organization's website contains many statements of praise for Palestinian terrorist "martyrs" but is silent about the Martyr's Foundation's activities regarding Palestinians. It is noteworthy that Palestinian organizations including Hamas have long spoken about the support they provide to the families of those killed or imprisoned by Israel, both directly from government funds and indirectly through organizations like the Al Nur Prisoner's Society in Gaza, a Hamas charitable organization similar to the Iranian Martyr's Foundation.

29. The lack of detail from the Martyr's Foundation about its activities abroad is presumably related to the actions that the U.S. government has taken against the Martyr's Foundation for its support for terrorists, including Hamas terrorists. On July 24, 2007, the Treasury Department designated the Iranian Martyr's Foundation under Executive Order 13224, which is aimed at financially isolating terrorists and their support networks. The Treasury press release explained:

The Martyrs Foundation is an Iranian parastatal organization that channels financial support from Iran to several terrorist organizations in the Levant, including Hizballah, Hamas, and the Palestinian Islamic Jihad (PIJ). To this end, the Martyrs Foundation established branches in Lebanon staffed by leaders and members of these same terrorist groups. Martyrs Foundation branches in Lebanon has also provided financial support to the families of killed or imprisoned Hizballah and PIJ members, including suicide bombers in the Palestinian territories. In addition to fundraising responsibilities, senior Martyrs Foundation officials were directly involved in Hizballah operations against Israel during the July-August 2006 conflict. In addition, a Lebanon-based leader of the Martyrs Foundation has directed and financed terrorist cells in the Gaza Strip that worked with Hizballah and PIJ.²

² See *Twin Treasury Actions Take Aim at Hizballah's Support Network*, 7/24/07, available at <https://www.treasury.gov/press-center/press-releases/Pages/hp503.aspx>.

30. In sum, Iran provides state support to terrorism through ostensibly charitable organizations, including support to Hamas through Iran's Martyr's Foundation.

F. U.S. State Department Judgments about Iran's Support for Terrorism

31. Iran is now, and since 1985, has been continuously listed on the U.S. State Department list of state sponsors of terrorism. The Secretary of State is required under U.S. law to provide Congress with an annual full and complete report on terrorism with regard to those countries and groups meeting criteria set forth in Title 22 of the United States Code, Section 2656 f(a) (requiring the Department of State to provide Congress with a full and complete annual report on terrorism for those countries and groups meeting the criteria of Sections (a)(1) and (2) of the Act). The list is set forth in an annual report called "*Patterns of Global Terrorism*" or more recently "*Country Reports on Terrorism*" (referred to herein as "Patterns of Global Terrorism"). Patterns of Global Terrorism is highly respected by researchers on terrorism, since the State Department has access to reliable intelligence sources not available to the general public and puts considerable effort into the document, making sure to double check and verify all facts and weighing each word carefully. Patterns of Global Terrorism reports frequently refer to Iran's role as a sponsor of terrorism and to its support for Hamas. Below are quotes from Patterns of Global Terrorism for selected years (the reports for intervening years have very similar statements to those cited here):

- **1994** - "Iran supports many other radical organizations that have engaged in terrorism. Tehran opposes any compromise with or recognition of Israel and, as the peace process moves ahead, has worked to coordinate a rejectionist front to oppose the Israeli-PLO accords, particularly with the PIJ [Palestinian Islamic Jihad], the PFLP-GC, and Hamas, as well as Hizballah."
- **1999** - "In Iran in 1999 [and every year before since 1983], the actions of certain state institutions in support of terrorist groups made Iran the most active state sponsor of terrorism. These state institutions notably the Revolutionary Guard Corps and the

Ministry of Intelligence and Security, continued to be involved in the planning and execution of terrorist acts and continued to support a variety of groups that use terrorism to pursue their goals.

“Iran has long provided Lebanese Hizbollah and the Palestinian rejectionist groups – notably Hamas, The Palestine Islamic Jihad, and Ahmad Jibril’s PFLP – GC with varying amounts of funding, safe haven, training and weapons. . . . Iran continued to encourage Hizbollah and the Palestinian groups to coordinate their planning and to escalate their activities against Israel.”

- **2003** - “Iran remained the most active state sponsor of terrorism in 2003. Its Islamic Revolutionary Guard Corps and Ministry of Intelligence and Security were involved in the planning of and support for terrorist acts and continued to exhort a variety of groups that use terrorism to pursue their goals.

“During 2003, Iran maintained a high-profile role in encouraging anti-Israeli activity, both rhetorically and operationally. Supreme Leader Khamenei praised Palestinian resistance operations, and President Khatami reiterated Iran’s support for the “wronged people of Palestine” and their struggles. Matching this rhetoric with action, Iran provided Lebanese Hizbollah and Palestinian rejectionist groups—notably HAMAS, the Palestine Islamic Jihad, and the Popular Front for the Liberation of Palestine–General Command—with funding, safe haven, training, and weapons. Iran hosted a conference in August 2003 on the Palestinian intifadah, at which an Iranian official suggested that the continued success of the Palestinian resistance depended on suicide operations.

- **2014** - “Designated as a State Sponsor of Terrorism in 1984, Iran continued its terrorist-related activity in 2014, including support for Palestinian terrorist groups in Gaza....The IRGC-QF [Quds Force] is the regime’s primary mechanism for cultivating and supporting terrorists abroad.... Iran has historically provided weapons, training, and funding to Hamas and other Palestinian terrorist groups, including Palestine Islamic Jihad (PIJ) and the Popular Front for the Liberation of Palestine-General Command (PFLP-GC). These Palestinian terrorist groups have been behind a number of deaths from attacks originating in Gaza and the West Bank. Although Hamas’s ties to Tehran have been strained due to the Syrian civil war, in a November 25 speech, Supreme Leader Khamenei highlighted Iran’s military support to ‘Palestinian brothers’ in Gaza and called for the West Bank to be similarly armed. In December, Hamas Deputy Leader Moussa Abu Marzouk announced bilateral relations with Iran and Hamas were ‘back on track.’”

G. Iran's Relationship With Hamas in Context of Its Support for Terrorism

32. It has been well-documented for over thirty years that Iran has provided funding and training for terrorism operations that targeted United States and Israeli citizens.

33. Such activities have included support for Hizbollah of Lebanon, al-Qaeda and Hamas, with the character of that support being quite different in each case. Hizbollah of Lebanon (or Hizbollah for short, though not to be confused with similarly named organizations in other countries which have varying degrees of ties with Hizbollah of Lebanon) is a Shiite terrorist organization established in 1982 by Iran as an extension of the Iranian Revolution in Lebanon and elsewhere in the Middle East. The IRGC's relationship with Hizbollah is extremely close, as is frequently proclaimed by leaders of Hizbollah and of Iran. Leaders on both sides refer to Iran's extensive financial and military support to Hizbollah.

34. Hamas is a terrorist organization established in 1987 by Palestinian Sunni Islamist militants opposing the establishment and existence of Israel. The founders of Hamas were close to and are ideologically aligned with the Egyptian Muslim Brotherhood organization. It is sometimes said that Hamas emerged out of the Gaza affiliate of that Muslim Brotherhood organization. The organizing principle of Hamas was advocacy of terrorist attacks on Israeli civilians, which its members did not think that the predominant Palestinian organization (the Fatah movement long led by Yassir Arafat) was doing sufficiently.

35. While Iran's relationship with Hamas has waxed and waned over the years, Iran never cut off all its support for Hamas even during periods when the relation was cool, and when the relationship was warm, Iran provided substantial financial and military support.

36. From about 1993 until the late 1990s, Iran and Hamas became very close, as a result of Hamas' willingness to perform terrorist activities and bus bombings. Iran had an urgent

desire to disrupt the Middle East peace process, which appeared to be moving forward at the time and Iran considered terrorist activities as a way to disrupt the peace process. Iran was strongly and publicly encouraging Hamas to carry out such activities. Throughout this period, Hamas operatives received military training in Iran. During an interview in 1997 with CBS' 60 Minutes TV program, Hassan Salameh, the designer of the February 25, 1996 bombing of the Number 18 Egged Bus in Jerusalem, confessed to planning the bombing, getting trained in Iran and receiving other support from Iran.

37. In March 1996 at a summit held in Egypt, I am personally aware that then Israeli Prime Minister, Shimon Peres, identified Iran as the principal sponsor of Hamas terrorism, and Palestinian Authority Chairman, Yasser Arafat, went so far as to state that Iran "ordered" bus bombings in Israel, including the one on February 25, 1996. My knowledge is based on briefings by Israeli officials at the highest level of government close to Mr. Peres, and by U.S. high level officials with personal knowledge of these activities.

38. Moreover, especially in 1995-1997, rarely did a Friday prayer meeting go by without the person leading prayers in Tehran, Iran praising bombings such as the subject bus bombing, with those statements then being widely carried on Iranian state-owned television, radio, print media and Iran's other propaganda networks throughout the Arab world. After the frequent bombings in the winter of 1995-1996, the Iranian news agency ran extremely inflammatory statements calling for further bombings and more blood.

39. During this period from about 1993 until the late 1990s, Iran gave Hamas millions of dollars, in addition to the hundreds of millions of additional dollars that Iran spent supporting other terrorist groups. The money, among other things, supported Hamas' terrorist activities, *e.g.*, by bringing Hamas into contact with potential terrorist recruits and by providing legitimate front

activities behind which Hamas could hide its terrorist activities. Iran typically paid generously for “results,” and Hamas was providing “results” by committing numerous bombings during this time.

40. After a period when the Iran-Hams relationship cooled, it deepened again in 2002. In *Hamas: The Islamic Resistance Movement* (Cambridge: Polity Press, 2010), by British professor Beverley Milton-Edwards and *New York Times* correspondent Stephen Farrell, the authors cite on p. 93 a November 2002 interview with “one of [Israeli Prime Minister Ariel] Sharon’s most senior intelligence chiefs” who said, “[Hamas] kept its independence since being established in 1987, but during the last year we could see how it has been changed, and Hamas became more dependent on Iran. The leadership of Hamas sits in Damascus, and they travel every three or four weeks to Iran.” In a July 30, 2003 report entitled “The Financial Sources of the Hamas Terror Organization,” the Israeli Ministry of Foreign Affairs estimated that Iran provided Hamas with \$3 million a year.

41. With a fall-off in Hamas terrorist activities – largely due to a fierce Israeli campaign against the organization – the Iran-Hamas relationship cooled after 2003. It warmed again after Hamas did well in the 2006 Palestinian elections and especially after the 2007 coup by which Hamas took complete control of the Gaza Strip, with Iran providing more money and arms. On March 5, 2007, Yuval Diskin, the director of Israel’s Security Agency (often referred by as Shin Bet, for its initials in Hebrew), told a press briefing as quoted in Milton-Edwards and Farrell, p 132, “What we see that is more dangerous than any weapons is the training that Iran has promised Hamas. We know that Hamas has started to dispatch people to Iran, tens with the promise of hundreds, for months and maybe years of training.” Milton-Edwards and Farrell also cite several interviews with Hamas fighters who acknowledged to them that Iran was providing

Hamas with weapons. They also write on p. 225, “ Hamas leaders openly acknowledged during this immediate post-election period [referring to the 2006 Palestinian elections] that they were getting financial help from Iran and others.”

42. The Iran-Hamas relationship waned again after 2011 as the IRGC provided arms and fighters to support the Assad regime in Syria in its battle against insurgents who included Sunni Islamists, but then the relationship improved after the Egyptian military’s 2013 overthrow of the Morsi government which had been close to Hamas, leaving Hamas quite dependent on Iranian aid. In January 2014, Taher al-Nounou, an aide to Gaza’s Prime Minister Ismail Haniyeh (one of the most important Hamas leaders), said “ Relations between us [Iran and Hamas] are now almost back to how they were before. We believe we shall soon be back at that point.” Asked if Iran had resumed its financial support, Nounou said, “ We don’t announce these things because there would be efforts to stop it.”³ Bassam Naim, another senior Hamas official added “ Ties [between Hamas and Tehran] had never been conclusively severed, but recently there have been a number of meetings that brought new blood back into our relationship with Iran”⁴

43. In March 2014, Israel intercepted the Panamian-flagged *Klos C* ship in the Red Sea off the Sudan coast, finding on board 40 M-302 advanced surface-to-surface rockets, 181 mortar shells, and 400,000 rounds of 7.62mm caliber ammunition. A leaked report from the UN’s Sanctions Committee charged with monitoring UN Security Council Resolution 1747’s order banning Iran from exporting weapons found that the origin of the shipment was in Iran,

³See Sherwood, Harriet, *Hamas and Iran Rebuild Ties Three Years After Falling Over Syria*, 1/9/14, *The Guardian*, available at <http://www.theguardian.com/world/2014/jan/09/hamas-iran-rebuild-ties-falling-out-syria>.

⁴ *Id.*

based on the ship's manifest, statements by the captain, and the nature of the cargo.⁵ (That committee did not discuss to where the arms were headed (that not being in their mandate), but Israeli officials provided details of the plans to smuggle the arms from Sudan across Egypt into Hamas-controlled Gaza. The State Department's Country Report on Terrorism 2014 describes the episode as, "In March 2014, Israel intercepted a weapons shipment containing rockets, mortars, and ammunition destined for Hamas and PIJ [a small pro-Iranian group in Gaza] in Gaza"⁶ In sum, there is strong reason to think that this arms shipment was organized by Iran.

44. Hamas-Iran relations were further strengthened in the course of 2014 as Hamas stepped up its terror activities. After Hamas's June 12 kidnap and murder of three teenagers including Naftali Fraenkel, Hamas rocket attacks and Israeli air strikes escalated into an Israeli invasion of Gaza on July 8 which continued until August 26, with the deaths of 71 Israelis and over 2,000 Gazans. Iran issued statements strongly supporting Hamas' activities during this time and in the aftermath. On September 29, Major General Gholi Ali Rashid of the Iranian Armed Forces General Staff Headquarters said, "Today some of our commanders are providing advisory assistance to Iraq and its army, in addition to the resistance in Lebanon, Hezbollah, and the Palestinian resistance movement." Supreme Leader Khamenei said on November 25, "The Islamic Republic of Iran, with divine grace, has not become prisoner of sectarian limitations and divisions. Just as it aids Shi'a Hizbollah in Lebanon, it aids Hamas and Islamic Jihad [PIJ] and other Sunni groups in Palestine."⁷

⁵ *Iran's Hand in Gaza: A Little-noticed U.N. Report Discloses the Tehran Regime's Role in Fueling Middle East Terror*, 7/8/14, *The Wall Street Journal*, available at <http://www.wsj.com/articles/how-iran-fuels-terror-1404849442>.

⁶ *Country Reports on Terrorism 2014*, U.S. Department of State, available at <http://www.state.gov/j/ct/rls/crt/2014/239413.htm>.

⁷ Author's translation from the statement on Khamenei's website <http://farsi/khamenei.ir/news-content?id=28249>.

45. A Hamas high-level delegation visited Tehran on December 8, 2014 just ahead of the annual December 14 celebration of the organization's founding in Gaza. To quote the respected on-line news service Al-Monitor, "A senior Hamas official abroad, who spoke on condition of anonymity, told Al-Monitor, 'Hamas is aware that Iran is under a harsh economic blockade and its financial expenses are enormous in neighboring countries. We may not have great hopes that financial support will be generous as it was before, but the military support for the movement may not be harmed much, which is sufficient for us at this stage.'"⁸ On December 9, 2014, Mohammad Nasr, part of the Hamas delegation in Tehran, said, "The Islamic resistance in Gaza [i.e., Hamas] defeated the Zionists because of the Islamic Republic's support." On December 14, Abu Obeida, the spokesman for Hamas' military wing called the Izz ad-Din al-Qassam Brigades, expressed his thanks to Iran for supporting Hamas with money and weapons and providing it with rockets and anti-tank missiles.⁹ That was an unusually blunt comment. Hamas' usual policy, as expressed by Hamas representative in Tehran, Khalid al-Qaddumi, is "Hamas does not have to reveal the mechanism and details of the support it receives from any party."

H. Financial Deterrence of Iranian Material Support to Terrorists

46. Iranian leaders pay close attention to civil suits about terrorism. In 2000/01, the issue became a major controversy in Iran. Iran's permanent representative to the UN, Nejad Hosseinian, went on Iranian television to complain about the suits and to answer criticisms that the Iranian government had not succeeded at stopping them. Representative Golbaz, a member of the Iranian Parliament's National Security and Foreign Policy Commission, complained, "Those American courts that make such rulings do so in the absence of the defendant as there is no Iranian representative in attendance in these courts." Former Iranian President, now chairman of

⁸ Adnan Abu Amer, *Hamas asks Iran for money, weapons, Al-Monitor*, December 17, 2014.

the powerful Expediency Council (charged with resolving disputes among the various organs of government), Ali Akbar Hashemi Rafsanjani complained at length about the suits, as did numerous members of Iran's Parliament. They were particularly upset at the large punitive damage awards, which they acknowledged exceeded a billion dollars. In late 2000, the Iranian Parliament adopted a law permitting Iranians to file suit against the U.S. government for its alleged misdeeds, such as the 1953 overthrow of Iranian Prime Minister Mussadegh (the law permits suits when damage is sustained from any action by a foreign government in contravention of international law, including interference in Iran's domestic affairs, or when damage is incurred from acts of terrorist groups backed by foreign governments). The Iranian government has several times referred to such a lawsuit having been brought, although the situation is not entirely clear.

47. Around the same time, Iran's lawyers expressed outrage at the suits. At the American Iranian Council's July 2000 forum on the grounds of the U.S. Capitol entitled "U.S.-Iran Relations: Financial Impediments and the Challenges of a 'Global Settlement,'" Mohammad Hossein Zahedin Labbaf, Iran's chief representative before the Iran-U.S. Claims Tribunal in the Hague¹⁰, devoted his remarks to a tirade against the American court suits regarding Iranian support for terrorism brought under the FSIA amendments. This was surprising to the American participants, who had assumed that the chief financial impediments to improving U.S.-Iranian relations related to the U.S. sanctions on Iran or the continuing disagreements at the Hague Tribunal about what Iran describes as "frozen assets." As an example of Labbaf's rhetoric, he said of these court suits, "They are detrimental to universal legal order, to the cause of justice, to

⁹ *Id.*

¹⁰ This claims tribunal was established to adjudicate claims under the 1981 Algiers Accord freeing the U.S. embassy hostages.

the United States' international image, and finally, to the long-term interests of both countries.” He also described them as contrary to article 11(4) of the 1955 Treaty of Amity between the United States and Iran, regarding sovereign immunity.

48. Despite the clear indications that in 2000 Iranian leaders were paying close attention to the court judgments against Iran for its support of terrorism, the effort to dissuade Iran from providing financial support for terrorism against Americans did not succeed. Several significant obstacles got in the way:

- The continuing influence of the most extreme elements in Iran, who have repeatedly rebounded from setbacks such as the election of two presidents who successfully opposed hardliners (Mohammed Khatami, elected in 1997 and re-elected in 2001, and Hassan Rouhani, elected in 2013).
- Iran's confidence that its oil income will be sufficient to finance its domestic needs and the support of terrorism, which is quite modest compared to the tens of billions in oil revenue. While this confidence was dented by the tough sanctions against Iranian oil sales adopted in 2012 by the European Union and the U.S. government, Iranian leaders soon spoke with great assurance that by successful negotiations over the nuclear impasse, they could get these sanctions reversed and regain full access to tens of billions of dollars – by some accounts, more than \$100 billion -- in foreign exchange reserves to which Iran has had limited access.
- The perceived successes of major terrorist groups which receives direct and material financial support from Iran, namely, Hezbollah's performance in its 2006 confrontation with Israel, followed up by its 2009-10 success in keeping a role in the Lebanese government despite doing badly in the elections, and Hamas' 2007 takeover of Gaza, though that has been tarnished by its poor showing in subsequent confrontations with Israel.
- The perception that the United States was tied down by Iraqi and Afghan insurgents who deliberately targeted innocent civilians, which Iranian leaders have often proclaimed as evidence that Islamist resistance movements and their terrorist activities can defeat the United States.

49. In consideration of these factors, the financial pressure to abandon terrorism against U.S. citizens and entities as a result of past court judgments was not sufficiently

powerful as to induce Iran to change course. But that pressure, in my opinion, certainly remains, and should not be underestimated, as an element in Iran's calculations about whether and how to support terrorism.

50. Indeed, Iran has recently been taking a more active stance about court actions regarding its support for terrorism. After years in which no lawyers representing Iran showed up to contest such actions, Iran has engaged lawyers in several recent suits. The most prominent case is *Peterson v. Islamic Republic of Iran*, U.S. District Court, Southern District of New York, No. 13-9195, a 2010 lawsuit seeking the seizure of \$1.75 billion dollars held by Citibank of funds belonging to Bank Markazi, the Iranian central bank, to partially satisfy a \$2.65 billion 2007 judgement against Iran in favor of relatives of American troops killed in the 1983 Marine Corps barracks bombing in Lebanon. Bank Markazi vigorously contest the suit, with an appeal all the way up to the U.S. Supreme Court, which was recently rejected.

51. Prior to that case, the most active Iranian role was a claim against property held at the University of Chicago Oriental Institute. After it was filed in May 2004, the claim was ignored by Iran until the June 2009 ruling by U.S. District Judge Blanche M. Manning that the case could proceed. Iran's lawyers then intervened for the first time. This came after the Iranian government had been for several years conducting an extensive and prolonged propaganda campaign to denounce the court decisions about the sale of ancient Iranian tablets held by the Oriental Institute in order to make partial payment of some outstanding claims from such suits. The propaganda has played on Iranian national pride in the country's rich historical heritage, arguing that the terrorism damage suits endanger these valuable items from Iran's cultural heritage.

52. Another example of a more active Iranian stance was a Montreal, Quebec suit seeking damages for the death under torture of a Canadian-Iranian, *Estate of the late Zahra (Ziba) Kazemi, and Stephan (Salman) Hashemi v. the Islamic Republic of Iran, et al.*, Montreal Superior Court case No. 500-17-031760-062, which Iran's lawyers vigorously contested after it was filed in December 2009.

53. Considering the factors inherent in awarding punitive damages, that of punishment and deterrence, it is noted that, in the wake of these lawsuits, Iran has not decreased its support for terrorism, but has dramatically increased and widened its support for terrorists, terrorist organizations and terrorist activities throughout the world. Punishment can be measured, in large part, in assessing significant financial damages for the continued and expanded wide-ranging world-wide support for terrorism supported by the Islamic Republic of Iran and its governmental arms. Iran is blatant in its support of terrorism. As to deterrence, there are two factors to consider: deterring such conduct by others, and making further efforts to deter Iran in its bold and increasing support for terrorism, which Iran uses to expand its influence, its reach and its force by terrorist means.

54. In my expert opinion, Iranian officials pay extremely close attention to what the outside world has to say about the Iranian government and its policies, and they generally assume that whatever is written about Iran – whether by judges, by independent newspapers, by non-governmental organizations, or by foreign ministries – is the direct product of a unified policy by the government of the country from which the comment originates. Furthermore, as noted earlier, they have shown themselves to be sensitive to the punitive damages levied against Iran, and they are well aware that such damages have been a common feature in actions against Iran for its support of terrorism against Americans. Were this Court not to impose punitive

damages for what was a spectacular terrorist act, this would be read by Iranian government officials as indicating a significant weakening of U.S. pressure on Iran to end its support for terrorism against Americans. On the other hand, were this Court to impose substantial punitive damages, this would be read by Iranian officials as indicating that U.S. policy remains firmly opposed to Iranian support for terrorism against Americans.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

A handwritten signature in blue ink, appearing to read "Pat L. Clawson", is written above a horizontal dashed line.

Patrick Clawson, PhD.

May 23, 2016

Date

Exhibit A

Curriculum Vita of Patrick L. Clawson

Dr. Clawson is Director for Research at The Washington Institute for Near East Policy. His previous positions include five years as senior research professor at the Institute for National Strategic Studies of the National Defense University and senior economist for four years each at the Foreign Policy Research Institute, the World Bank, and the International Monetary Fund.

Dr. Clawson speaks often about Iran for U.S. government audiences, including for the Office of the Director of National Intelligence, the United States Central Command, the U.S. Army's Central Command, various offices at the State Department (including briefing U.S. ambassadors to Middle Eastern countries), and tours arranged by several U.S. embassies. He has lectured about Iran and Middle East politics in more than twenty countries, including Saudi Arabia, the U.A.E., Kuwait, Bahrain, Israel, Russia, China, Britain, France, Germany, Italy, Spain, the Netherlands, Belgium, Austria, Poland, Portugal, the Czech Republic, Australia, and Canada.

Dr. Clawson has testified often about Iran before the House International Relations, National Security, and Banking and Financial Services Committees and the Senate Foreign Relations and Banking Committees. From 2009 through 2014, he served on the Distinguished Advisory Panel of the Department of Energy's Sandia National Laboratory, which is the lead actor on many nuclear security issues. From 1994 to 2012, Dr. Clawson was senior editor of *Middle East Quarterly*. From 1990 through 1994, he was editor of *Orbis*, a foreign policy quarterly.

Dr. Clawson has written extensively about Iran including for *The New Republic* as well as op-ed articles in *New York Times*, *Wall Street Journal*, and *Washington Post*, among other newspapers. He is the author of more than thirty scholarly articles in *Foreign Affairs*, *Survival*, *Washington Quarterly*, *International Journal of Middle East Studies*, *Middle East Journal*, *Les Cahiers de l'Orient*, and *Oxford Bulletin of Economics and Statistics*, among other journals.

Dr. Clawson most recent co-authored book, *The Monetary History of Iran From the Safavids to the Qajars* (I.B. Tauris, 2013), with Rudi Matthee and Willem Floor, won the Middle East Studies Association of North America's Pourshariati Award for best book about Iran. His 14 other books and monographs about Iran include: *Preventing an Iranian Nuclear Breakout: U.S.-Israel Coordination* (The Washington Institute for Near East Policy, 2012, with David Makovsky); *An Iranian Nuclear Breakout Is Not Inevitable* (The Washington Institute for Near East Policy, 2011); *Engaging Iran: Lessons from the Past* (The Washington Institute for Near East Policy, 2009, edited); *The Last Resort: Consequences of Preventive Military Action Against Iran* (The Washington Institute for Near East Policy, 2008, with Michael Eisenstadt); and *Deterring the Ayatollahs: Complications in Applying Cold War Strategy to Iran* (The Washington Institute for Near East Policy, 2007, edited with Michael Eisenstadt); and *Eternal Iran: Continuity and Chaos* (Palgrave, 2005, with Michael Rubin). He has also written or edited seven monographs and books on other issues about the Middle East, such as energy security.

Dr. Clawson has been an expert witness about Iran in thirty federal court cases, mostly about Iran's support for terrorism. Those case include: including *Cicippio v. Islamic Republic of Iran*, 18 F. Supp.2d 62, 68 (D. D.C. 1998); *Flatow v. Islamic Republic of Iran*, 999 F. Supp. 1, 8-9 (D.D.C. 1998); *Cronin v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 99-02890 (1999); *Higgins v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 99-00377 (1999); *Stehem v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 00-00159 (2000); *Hegna v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 00-00716 (2000); *Anderson v. Islamic Republic of Iran*, 90 F. Supp. 2d 107, 112-113 (D.D.C. 2000); *Eisenfeld v. Islamic Republic of Iran*, 172 F. Supp. 2d 1, 5 (D.D.C. 2000); *Elahi v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 99-02802 (1999); *Wagner v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 00-017999; *Polhill v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 00-01798 (2000); *Mousa v. Islamic Republic of Iran*, 238 F. Supp. 2d 1, 3-4 (D.D.C. 2001); *Raffi v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 01-850 (2001); *Kerr v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 01-01994 (2001); *Surette v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 01-00570 (2001); *Weinstein v. Islamic Republic of Iran*, 184 F. Supp. 2d 13, 19 (D.D.C. 2002); *Ungar v. Islamic Republic of Iran*, 271 F. Supp. 2d 91, 93 (D.D.C. 2002); *Stern v. Islamic Republic of Iran*, 271 F. Supp. 2d 286, 288 (D.D.C. 2003); *Rieger v. Islamic Republic of Iran*, 281 F. Supp. 2d 87, 90 (D.D.C. 2003); *Campuzano v. Islamic Republic of Iran*, 281 F. Supp. 2d 258, 262 (D.D.C. 2003); *Greenbaum v. Islamic Republic of Iran*, No. 02-2148, 2006 WL 2374221 at * 3 (D.D.C. Aug. 10, 2006); *Levin v. Islamic Republic of Iran*, U.S.D.C., D.C. No. 05-2494 (2007); *Owens v. Republic of Sudan, et al.*, No. 01-2244, 2011 U.S. Dist. LEXIS 135961 (D.D.C. Nov. 28, 2011); *In Re Terrorist Attacks on September 11, 2001*, No. 03-MDL-1570 (S.D.N.Y. Dec. 22, 2011), among others.

Dr. Clawson's Ph.D. in economics is from the New School for Social Research and his B.A. is from Oberlin College. He speaks fluently Persian and French , as well as some Hebrew, Spanish, and German.