

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

24-CR-59-A

HADI MATAR,

Defendant.

GOVERNMENT'S EXPERT DISCLOSURE

The United States of America hereby serves notice of its intention to offer the testimony of Dr. Matthew Levitt as an expert on Hezbollah; Iran's relationship with Hezbollah; the civil and religious authority of Ayatollahs Khamenei and Khomeini within Iran and among Shia Muslims; and Ayatollah Khamenei's issuance of a *fatwa* ordering the death of Salman Rushdie.

1. Professional Background and Bases for Opinions

Dr. Levitt's qualifications as a noted expert in international terrorism, with a focus on Middle East terrorist groups like Hezbollah, as well as other Iranian-sponsored terrorist organizations, are based on a multidisciplinary combination of his academic education, professional training, research, and experience.

Dr. Levitt is a United States citizen, residing in the Washington, D.C. area. He holds both a Masters of Law and Diplomacy (MALD) and a Ph.D. in International Relations from The Fletcher School of Law and Diplomacy at Tufts University. The Fletcher School, a member of the Association of Professional Schools of International Affairs and one of the preeminent graduate programs in international affairs in the United States, is renowned for

its interdisciplinary curriculum and approach to international studies.

Dr. Levitt's Master's degree included concentrations in Conflict Resolution, International Security Studies, and the Middle East. His doctoral dissertation entitled "The Impact of Acute Security Crises on the Process of Ongoing Negotiations," examines the impact of terrorism on the Arab-Israeli peace process. The dissertation examines acts of terrorism carried out by both Islamic and Jewish terrorists. Dr. Levitt was awarded several fellowships and grants in support of this research, including a graduate research fellowship from the Program on Negotiation at Harvard Law School. While at Harvard Dr. Levitt conducted extensive field research in the West Bank and Gaza Strip. In a letter supporting his application for funding for Dr. Levitt's doctoral work, an assistant director of the FBI described the project as one that "will be of great benefit to the FBI and the U.S. Intelligence Community (USIC)."

Prior to joining the Washington Institute, Dr. Levitt served as a counterterrorism intelligence analyst with the Federal Bureau of Investigation (FBI), providing tactical and strategic analysis in support of counterterrorism operations. There Dr. Levitt developed a special focus on fundraising and logistical support networks for Middle East terrorist groups. In addition, Dr. Levitt participated as a team member in a number of crisis situations, including the terrorist threat surrounding the turn of the millennium and the September 11 attacks. In his official capacity as a U.S. government intelligence analyst, Dr. Levitt researched and analyzed trends and patterns of international terrorist groups, produced written products and oral presentations for FBI management, FBI field agents and other agencies, and liaised with U.S. intelligence community counterparts, other U.S. government agencies, and foreign services. Dr. Levitt received extensive training and developed particular

expertise in the analysis of material collected through investigations and the synthesis and further analysis of this material together with other sources of information provided by other agencies, open source information, and more. In this capacity Dr. Levitt also made several trips to the Middle East. Indicative of his expertise, Dr. Levitt earned three letters of commendation for his analytical contributions to FBI counterterrorism operations, as well as five awards in recognition of superior service rendered to the FBI.

In November 2001 Dr. Levitt joined The Washington Institute for Near East Policy as a Senior Fellow in Terrorism Studies. Founded in 1985, The Washington Institute seeks to “advance a balanced and realistic understanding of American interests in the Middle East” by bringing “scholarship to bear on the making of U.S. policy in this vital region of the world.” The Institute’s Board of Advisors includes several former Secretaries of State, a former Director of Central Intelligence, and other former senior government officials and diplomats. The Washington Institute holds annual conferences and periodic policy forums, hosts blue-ribbon presidential study groups, and publishes scholarly research.

From November 2005 through January 2007, Dr. Levitt served as Deputy Assistant Secretary for Intelligence and Analysis in the United States Department of the Treasury. In that capacity, Dr. Levitt served both as a senior official within the department’s terrorism and financial intelligence branch and as deputy chief of the Office of Intelligence and Analysis, one of sixteen U.S. intelligence agencies coordinated under the Office of the Director of National Intelligence. During his tenure at Treasury, Dr. Levitt was at the center of the government’s efforts to protect the U.S. financial system from abuse and to deny terrorists, weapons proliferators, and other rogue actors the ability to finance threats to U.S. national security. In recognition of exceptional service to the department, in January 2007 Dr. Levitt

was awarded the Treasury Department's "Exceptional Service Award." In 2008-2009 Dr. Levitt also served as an advisor on counterterrorism and intelligence for the U.S. State Department's Special Envoy Middle East Regional Security (SEMERS) whose mission was to help achieve the Secretary of State's vision of resolving the Israeli-Palestinian conflict through two states living side by side in peace and security.

In February 2007, Dr. Levitt returned to the Washington Institute, where he is now a Senior Fellow and Director of the since renamed Reinhard Program on Counterterrorism and Intelligence. In this capacity, Dr. Levitt is frequently sought after as an analyst and commentator on terrorism issues for major media outlets including CNN, ABC, NBC, CBS, PBS, *The New York Times*, *The Washington Post*, *The Wall Street Journal*, National Public Radio, BBC, al Jazeera, al Arabiya, and more. Dr. Levitt has lectured and consulted on terrorism for a variety of government and other organizations, including the U.S. Departments of State, Homeland Security, and Justice, the Commission on Terrorist Attacks Upon the United States (9-11 Commission), the Financial Transactions Reports Analysis Centre of Canada (FINTRAC), the Canadian Security and Intelligence Service, Department of Justice Canada, and others, and writes frequent policy briefs and articles on issues relating to terrorism and U.S. policy.

Dr. Levitt is an adjunct professor at both Georgetown University's Edmund A. Walsh School of Foreign Service and Pepperdine University's School of Public Policy. Dr. Levitt has also taught as a Professorial Lecturer in International Relations and Strategic Studies at Johns Hopkins University's School of Advanced International Studies (SAIS). Along with a collection of journal articles and edited volumes, Dr. Levitt is also the author of *Targeting Terror* (Washington Institute, 2002), *Hamas: Politics, Charity and Terrorism in the Service of*

Jihad (Yale University Press, 2006), *Negotiating under Fire: Preserving Peace Talks in the Face of Terror Attacks* (Rowman & Littlefield, 2008) and *Hezbollah: The Global Footprint of Lebanon's Party of God* (Georgetown University Press, 2013, updated volume published in 2025). A full list of Dr. Levitt's books, monographs, journal articles, editorials, and policy briefs is available in his professional C.V., which is attached hereto as Exhibit A.

Dr. Levitt has developed particular expertise on Hezbollah and Iranian sponsorship of terrorism, as evidenced from the many publications he has written on these subjects, from newspaper editorials and peer reviewed journal articles to Congressional and court testimonies and books. Dr. Levitt is also the author of a peer-reviewed book on Hezbollah, now in its third updated edition and published by both Georgetown University Press and Hurst Publishers. Dr. Levitt is also the creator of a podcast on Hezbollah, now in its third season, entitled "Breaking Hezbollah's Golden Rule," and an interactive and open-access map and timeline of Hezbollah activities around the world.

At The Washington Institute Dr. Levitt's work includes the study of Middle Eastern terrorist groups, front organizations and state sponsors, the logistical and financial support networks that facilitate their activities, and the extremist and militant ideologies that drive their recruitment and radicalization efforts. In his efforts to study and understand terrorism and militant Islamist ideology, Dr. Levitt interviews experts, officials, academics and others with insight into these issues, both in the United States and Europe and in the Middle East. Dr. Levitt engages in private, personal meetings, public conferences, group discussions, and talks that are both on and off the record. Dr. Levitt travels to the Middle East regularly, including trips to the Palestinian territories, Israel, Jordan, Egypt, Bahrain, Kuwait, Qatar, Saudi Arabia, the UAE and Turkey. Dr. Levitt also attends conferences and academic and

professional lectures, and reads books, newspapers, academic and policy journals, and researches these materials on the internet (including the websites, video and audio clips and images on sites geared towards counterterrorism and those of terrorist groups and their sympathizers as well). These are the standard sources and methods in the academic and policy communities for developing the kind of specialized knowledge and expertise Dr. Levitt has accumulated – and for which he has been awarded and commended – in his field. Indeed, the Sixth Circuit approvingly quoted a district court describing Dr. Levitt’s research methodology as “the gold standard in the field of international terrorism,”¹ which courts continue to note today.² And, in a watershed ruling upholding the constitutionality of the material support statute 18 U.S.C. §2339B, the Supreme Court of the United States cited Dr. Levitt’s work twice to support its holding.³

Compiling information from sources such as these, Dr. Levitt studies and evaluates the information and data he collects, and writes about and lectures on his findings. Dr. Levitt engages in regular discussions with other experts both to compare notes and as a means of affording himself an ongoing process of peer-review and fact-checking. When providing expert testimony in criminal court cases, Dr. Levitt also reviews evidence provided by the prosecution.

In addition to his work at the Institute, Dr. Levitt uses his specialized expertise to teach and consult, both for the U.S., and other governments and private sector firms. Dr. Levitt

¹ *United States v. Damrah*, 412 F.3d 618, 625 (6th Cir. 2005).

² See *Finan v. LaFarge, S.A.*, 22-CV-7831 (NGG) (PK), 2025 WL 2504317 at *9 (E.D.N.Y. Aug. 29, 2025).

³ See *Holder v. Humanitarian Law Project*, 561 U.S. 1, 30-31 (2010).

was a member of the Council on Foreign Relations' task force on terrorist financing, and has served as a member of the international advisory boards for the Institute for Counter-terrorism (ICT) in Israel, the International Centre for Political Violence & Terrorism Research (ICPVTR) in Singapore, and the Emirates Center for Strategic Studies and Research (ECSSR). Dr. Levitt served as a CTC Fellow at the Combating Terrorism Center (CTC) at the U.S. Military Academy (West Point), and a senior fellow at The George Washington University's Homeland Security Policy Institute, and he is a life member of The Council on Foreign Relations.

The awards and honors Dr. Levitt has received include:

- Faculty and Staff Career Champion 2022, Georgetown University, 2022
- Andrew H. Siegel Professorship in American Middle Eastern Foreign Policy, Georgetown University, 2021-2022
- U.S. Embassy Expert Speaker Grant, U.S. Embassy Berlin, May 2019
- Certificate of Appreciation, United States Secret Service, 2015
- Certificate of Recognition, U.S. Departments of Justice and State and the International Institute for Justice and the Rule of Law, October 2015
- U.S. Marine Corps Forces Cyber Command, Letter of Appreciation, April 3, 2013
- Certificate of Appreciation, Federal Bureau of Investigation, March 2013
- Exceptional Service Award, U.S. Department of the Treasury, January 2007;
- Certificate of Appreciation, United States Central Command Directorate of intelligence, February 2006;
- Selected by CNN as one of "The 2005 New Guard: Washington's Next

Generation of Newsmakers,” April 2005;

- European Union Visitors Program (EUVP), 2005;
- Visiting Scholar, Security Studies Department, the Paul H. Nitze School of Advanced International Studies (SAIS), Johns Hopkins University, March 2003;
- U.S. Department of State Speaker and Specialist Grant (2), April 2002 (lectures in Lithuania), and January 2003 (lectures in Austria);
- Letters of Commendation from Deputy Assistant Director (3), Federal Bureau of Investigation, July 2000, August 2000, July 2001;
- Performance Awards (2), Federal Bureau of Investigation, December 1999, November 2000;
- Special Act or Service Award, Federal Bureau of Investigation, September 1999;
- Graduate Research Fellow, The Program On Negotiation at Harvard Law School, 1997-1998;
- International Security Studies Fellow, International Security Studies Ph.D. Dissertation Fellowship, the Fletcher School of Law and Diplomacy, 1996-1997;
- International Security Studies Program Graduate Student Research Grant on the Emerging Issues of Ethnic, Sectarian, and Religious Conflict, William H. Donner Foundation, 1996;
- Doctoral Scholarship, the Fletcher School of Law and Diplomacy, 1995-1996;
- Sarah Scaife Frank Rockwell Barnett Memorial Grant in International Security

Studies, The Fletcher School of Law and Diplomacy, 1994 and 1996

Dr. Levitt is frequently called upon to testify before the United States Senate and House of Representatives as an expert on international terrorism, militant Islam, and terrorist financing. Dr. Levitt has been qualified as an expert witness and provided expert testimony in many U.S. federal court proceedings and has testified as an expert in several terrorism-related immigration cases in the U.S. and Canada, as well as in terrorism-related cases in Denmark, France, Peru, and Scotland. Many of these cases involved Hamas, other foreign terrorist organizations, and/or State Sponsors of Terrorism such as Iran and Syria. A list of these cases is included in Dr. Levitt's C.V.

Dr. Levitt is being compensated at a rate of \$550.00 per hour for his work on this case. His opinions are his own, however, and he is compensated for his time whatever his opinions may be.

2. Summary of Testimony to be Elicited at Trial

At trial, Dr. Levitt will be called to testify as an expert on Hezbollah; Iran's relationship with Hezbollah; the civil and religious authority of Ayatollahs Khamenei and Khomeini within Iran and among Shia Muslims; and Ayatollah Khamenei's issuance of a *fatwa* ordering the death of Salman Rushdie.

In particular, Dr. Levitt will be asked about Hezbollah's formation, its terrorist activities, its role within Lebanon, and its relationship with Iran. Dr. Levitt will testify about Hezbollah's structure, including the role of Hezbollah's External Security Organization (ESO). Dr. Levitt will be asked about the significance of certain individuals to Hezbollah, including Hezbollah's former Secretary General, Hassan Nasrallah; the former head of Hezbollah's ESO, Imad Mughniyah, as well as his son, Jihad Mughniyah; and Hezbollah

operative Ahmad Kassir, who was described by Hezbollah as a martyr when he was killed. Dr. Levitt will also testify about the historical context for a 2006 speech given by Hassan Nasrallah discussing Ayatollah Khamenei's issuance of a *fatwa* ordering the death of Salman Rushdie. Finally, Dr. Levitt will be asked about the significance of certain events and concepts within Hezbollah, including the significance of the date May 25; the role of martyrs within Hezbollah; and the use of martyr cards by Hezbollah's supporters.

Dr. Levitt will also testify about the civil and religious authority of Ayatollahs Khamenei and Khomeini within Iran and among Shia Muslims, and Ayatollah Khamenei's issuance of a *fatwa* ordering the death of Salman Rushdie. Specifically, Dr. Levitt will be asked about the roles of Ayatollahs Khamenei and Khomeini in Iranian government and Shia Islam, including their authority to issue *fatwas*, the concept of *wilayat al-faqih*,⁴ and the role of a *marja* in Shia Islam.⁵ Dr. Levitt will also be asked about Ayatollah Khamenei's *fatwa* directing the execution of Salman Rushdie. Finally, Dr. Levitt will also be asked about the Rushdie *fatwa*'s continuing validity following Ayatollah Khamenei's death and its reaffirmation by Ayatollah Khomeini.

Dr. Levitt may also be asked to testify about certain evidence that the government will introduce at trial, including physical evidence, videos, photos, and other propaganda seized from the defendant's electronic devices. Specifically, Dr. Levitt will be asked to explain the significance of those materials (including phrases, images, figures, and symbols contained therein) in the context of the defendant's embrace of Hezbollah and efforts to carry out

⁴ In Shia Islam, *wilayat al-faqih*, or rule of the jurisprudent, is a system of governance that vests all political and religious authority in a supreme leader.

⁵ Generally speaking, in Shia Islam, a *marja* is a jurist who has the highest-ranking religious authority.

Ayatollah Khamenei's *fatwa* directing the execution of Salman Rushdie. These materials reference words, concepts, individuals, and places that are well-known to experts like Dr. Levitt but are unfamiliar to ordinary people.

Dr. Levitt's experience in these fields, as well as his research and writing on these topics, as extensively detailed above and in his curriculum vitae, will serve as the bases for his testimony and opinions.

DATED: Washington, D.C., April 7, 2026

A handwritten signature in black ink, appearing to read 'Matthew A. Levitt', written over a horizontal line.

Matthew A. Levitt, Ph.D.