

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

HAMID HASSAN RAZA; MASJID AL-ANSAR;  
ASAD DANDIA; MUSLIMS GIVING BACK;  
MASJID AT-TAQWA; MOHAMMAD  
ELSHINAWY,

Plaintiffs,

v.

CITY OF NEW YORK; MICHAEL R.  
BLOOMBERG, in his official capacity as Mayor  
of the City of New York; RAYMOND W.  
KELLY, in his official capacity as Police  
Commissioner for the City of New York; DAVID  
COHEN, in his official capacity as Deputy  
Commissioner of Intelligence for the City of New  
York,

Defendants.

No. 13-cv-03448-PKC-JMA

Hon. Judge Joan Azrack

**DECLARATION OF ASHLEY GORSKI**

I, Ashley Gorski, a member of the Bar of the State of New York and a member of the bar of this Court, declare under penalty of perjury as follows:

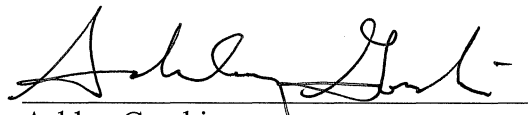
1. I am an attorney with the American Civil Liberties Union Foundation, which is counsel for Plaintiffs in this matter. I submit this declaration in support of Plaintiffs' Reply Brief Concerning Interrogatories Challenged on Grounds of First Amendment Privilege and Retroactive Justification.

2. Attached hereto as **Exhibit A** is an updated chart categorizing the discovery requests served by Defendants that Plaintiffs challenge on First Amendment, privacy, and retroactive justification grounds.

3. Attached hereto as **Exhibit B** are true and correct copies of Plaintiffs' First Set of Supplemental Responses and Objections to Defendants' First Set of Interrogatories and Requests for Production of Documents for Plaintiffs Asad Dandia, Mohammad Elshinawy,<sup>1</sup> and Muslims Giving Back; and Plaintiffs' Second Set of Supplemental Responses and Objections to Defendants' First Set of Interrogatories and Requests for Production of Documents for Plaintiffs Hamid Hassan Raza, Masjid Al-Ansar, and Masjid At-Taqwa.

\* \* \*

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

  
Ashley Gorski

Dated: August 8, 2014  
New York, New York

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<sup>1</sup> A portion of Plaintiff Elshinawy's response to Interrogatory No. 46 is contained in an addendum to Plaintiffs' First Set of Supplemental Responses and Objections to Defendants' First Set of Interrogatories and Requests for Production of Documents for Plaintiff Elshinawy. Because this addendum has been designated Attorneys' Eyes Only pursuant to the Stipulation and Protective Order for the Production and Exchange of Confidential Materials, Plaintiffs have not included it here. If requested by the Court, Plaintiffs will provide this addendum to the Court under seal.

# Exhibit A

**DISPUTED DISCOVERY REQUESTS<sup>1</sup>**

Disputed requests for Plaintiffs' financial information.	<p><b>Document Requests:</b> Nos. 21, 22, 23, 24, 25, 28, 29, 44, 45, 47, &amp; 64</p> <p><b>Interrogatory:</b> No. 53</p>
Disputed requests for Plaintiffs' tax records.	<p><b>Document Requests:</b> Nos. 22 &amp; 64</p>
Disputed requests for associational information.	<p><b>Document Requests:</b> Nos. 43, 59, &amp; 60</p> <p><b>Interrogatories:</b> Nos. 1, 5, 6, 8, 9, 10, 11, 12, 17, 18, 19, 20, 25, 27, 28, 30, 32, 33, 34, 35, 37, 38, 39, 43, 44, 45, &amp; 47</p>
Disputed requests concerning Plaintiffs' religious or political speech, discussion, or ideas.	<p><b>Document Requests:</b> Nos. 12, 14, 30, &amp; 34</p>
Disputed requests seeking information to retroactively justify NYPD conduct.	<p><b>Document Requests:</b> Nos. 5, 6, 11, 12, 13, 21, 22, 23, 24, 25, 28, 29, 30, 43, 44, 45, 47, &amp; 52</p> <p><b>Interrogatories:</b> Nos. 26, 53, 55 &amp; 56</p>

<sup>1</sup> This chart updates Plaintiffs' list of disputed discovery requests to include Interrogatories No. 1, 26, 30, 32, 33, 35, and 39, based on the outcome of the meet-and-confers that followed Plaintiffs' initial briefing. *See* Hirose Decl. Ex. A (ECF No. 49-2); Minute Entry dated April 3, 2014 (ECF No. 51) (finding that Plaintiffs' arguments related to interrogatories were not yet ripe). Those negotiations made clear that Defendants sought additional information, including congregant and member identities, covered by the arguments addressed in Plaintiffs' opening brief. *See also* Hearing Tr. 66:20–67:8 (7/9/2014).

# Exhibit B

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

HAMID HASSAN RAZA; MASJID AL-ANSAR;  
ASAD DANDIA; MUSLIMS GIVING BACK;  
MASJID AT-TAQWA; MOHAMMAD ELSHINAWY,

Plaintiffs,

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CITY OF NEW YORK; MICHAEL R. BLOOMBERG,  
in his official capacity as Mayor of the City of New  
York; RAYMOND W. KELLY, in his official capacity  
as Police Commissioner for the City of New York;  
DAVID COHEN, in his official capacity as Deputy  
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Defendants.

No. 13-cv-03448-PKC-JMA

Hon. Judge Pamela Chen  
Hon. Judge Joan Azrack

**PLAINTIFFS' FIRST SET OF SUPPLEMENTAL RESPONSES AND OBJECTIONS TO  
DEFENDANTS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS:**

**INTERROGATORY RESPONSES OF  
ASAD DANDIA**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Asad Dandia ("Plaintiff") submits the following supplemental responses and objections to the interrogatories set forth in Defendants' First Set of Interrogatories and Requests for Production of Documents, dated December 6, 2013 ("Interrogatories").<sup>1</sup>

**GENERAL RESPONSES AND OBJECTIONS**

1. These general objections apply to each of the Interrogatories. To the extent that certain of these general objections are cited in response to a particular Interrogatory, these

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<sup>1</sup> Additional supplemental responses and objections to Defendants' First Set of Interrogatories and Requests for Production of Documents by each of the Plaintiffs are being served on Defendants concurrently with this response.

specific citations are provided because they are believed to be particularly applicable to the Interrogatory and are not to be construed as a waiver of any other general objection applicable to information or documents falling within the scope of the Interrogatory.

2. This response is based on Plaintiffs' knowledge of the facts and information presently available. Plaintiffs have not completed their discovery, investigation, and preparation for trial in this matter.

3. Plaintiffs object to the Interrogatories to the extent that they are overbroad, call for speculation, call for narrative answers, and/or seek information or documents that are not relevant to the subject matter of this action and are not reasonably calculated to lead to the discovery of admissible evidence. The shorthand "**Relevance**" is used to refer to this objection in response to particular Interrogatories.

4. Plaintiffs object to the Interrogatories to the extent that a complete response by Plaintiffs requires production of information in the possession of Defendants, information that Defendants are in a superior position to know or ascertain, or information that is publicly available. The shorthand "**NYPD Record**," "**Public Record**," or "**NYPD/Public Record**" is used to refer to this objection in response to particular Interrogatories.

5. Plaintiffs object to the Interrogatories to the extent that they are overly broad, unduly burdensome, and oppressive. Plaintiffs further object to the Interrogatories to the extent that the scope and the total number of Interrogatories, including multi-part Interrogatories, are also improper, unduly burdensome, oppressive, and overbroad. The shorthand "**Undue Burden**" is used to refer to this objection in response to particular Interrogatories.

6. Plaintiffs object to the Interrogatories to the extent that they seek information or documents protected from disclosure by the attorney-client privilege, the joint defense and/or

common interest privilege, the work-product doctrine, or any other privilege, doctrine or immunity. The shorthand “**Privilege**” is used to refer to this objection in response to particular Interrogatories.

7. Plaintiffs object to the Interrogatories to the extent that they seek information or documents that violate, implicate, or burden the First Amendment interests of Plaintiffs or Plaintiffs’ members, congregants, worshippers, or donors, or others, including the associational privacy of the members and donors of organizational plaintiffs. The shorthand “**First Amendment**” is used to refer to this objection in response to particular Interrogatories.

8. Plaintiffs object to the Interrogatories to the extent that they seek information or documents that raise significant privacy concerns and/or concerns of perpetuating the very harms that Plaintiffs have sued to prevent. The shorthand “**Privacy**” is used to refer to this objection in response to particular Interrogatories.

9. Plaintiffs object to the Interrogatories to the extent they are posed without a time limitation, vague, ambiguous, and/or susceptible to numerous interpretations, and/or to the extent that they misconstrue language from the Complaint dated June 18, 2013. In such instances, Plaintiffs have adopted a reasonable time limitation and/or interpretation for the Interrogatory, and answered accordingly. The shorthand “**Vagueness**” is used to refer to this objection in response to particular Interrogatories.

10. Plaintiffs object to the Interrogatories to the extent that they purport to seek information or documents not within Plaintiffs’ possession, custody or control. The shorthand “**Custody**” is used to refer to this objection in response to particular Interrogatories.

11. Plaintiffs object to the Interrogatories to the extent that they seek each and every fact supporting specific allegations. Plaintiffs’ response is limited to material facts and is not a



detailed or exhaustive listing of all evidence that could be offered at trial.

12. Plaintiffs object to the Interrogatories to the extent that they call for a legal conclusion or questions of pure law separate and apart from the facts of this case.

13. Plaintiffs object to the Interrogatories as overbroad and unduly burdensome in that they are not limited in time and thus exceed the relevant timeframe of the acts giving rise to the claims and defenses alleged in this matter. The Interrogatories call for information that is neither relevant to the prosecution or defense of any claim asserted in this action nor reasonably calculated to lead to the discovery of admissible evidence.

14. Plaintiffs object to the Interrogatories to the extent that they purport to impose upon Plaintiffs obligations inconsistent with or in addition to those set forth in the Federal Rules of Civil Procedure or in the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York. Plaintiffs object to the Defendants' instructions and definitions to the extent they impose broader definitions or rules of constructions than are set forth in Local Rule 26.3. Plaintiffs further object to the Defendants' Interrogatories to the extent that the Interrogatories and all discrete subparts exceed the numerical limitation on Interrogatories imposed by Federal Rule of Civil Procedure 33.

15. This response is made without prejudice to Plaintiffs' expressly reserved right to supplement, modify, or amend these responses and objections as appropriate.

## **RESPONSES AND OBJECTIONS**

### **To Asad Dandia/Muslims Giving Back Only:**

11. Identify all persons who were active members of Fesabeelilah ("FSNYC"), who donated to FSNYC, or who regularly attended FSNYC events, as alleged in ¶ 81 of the complaint.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden,

Relevance, First Amendment, Privacy, and Vagueness. The Interrogatory is vague to the extent it uses the undefined term “active members” and refers to those who “regularly attended FSNYC events.” Moreover, FSNYC has a First Amendment right to privacy in its membership and donor lists. Subject to and without waiving or limiting any objections, Plaintiff responds that the FSNYC Board consisted of the following individuals:

Asad Dandia  
*Contact through Plaintiffs’ counsel*

Mohammed Butt  
*Contact through Plaintiffs’ counsel*

Talal Syed  
*Contact through Plaintiffs’ counsel*

12. Identify all persons who Dandia introduced to Shamiur Rahman in 2012, as alleged in ¶ 84 of the complaint.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, First Amendment, Privacy, NYPD Record, and Vagueness. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

13. Identify all persons who were asked by Rahman for their phone numbers, as alleged in ¶ 87 of the complaint.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, First Amendment, Privacy, NYPD Record, and Custody. Plaintiff further objects on the basis of Custody because he may not know the identities of all persons who were asked by Rahman for their phone numbers. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

14. Identify all efforts specifically undertaken by Dandia to publicize FSNYC and MGB, as alleged in ¶ 92 of the complaint.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, Public Record, and Vagueness. Plaintiff further objects on the basis of Vagueness as paragraph 92 of the Complaint states that Mr. Dandia personally stopped publicizing FSNYC activities.

15. Identify all persons referenced in ¶¶ 90-92 of the complaint, including (i) all “friends” who told Dandia that NYPD Informants had infiltrated FSNYC; (ii) the identity of the “credible source in the NYPD Intelligence Division”; and (iii) the identities of the NYPD Informants who purportedly infiltrated FSNYC.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, Privacy, Vagueness, NYPD Record, and Custody. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiff further objects on the basis of NYPD Record and Custody because he does not know the identities of all NYPD Informants who infiltrated FSNYC and will not speculate as to their identities. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff responds as follows with respect to part (ii) of the Interrogatory:

Plaintiff Dandia does not know the identity of the person his friend described as a credible source in the NYPD Intelligence Division.

Plaintiff further responds as follows with respect to part (iii) of the Interrogatory:

Shamiur Rahman

*Last known address:* Unknown

*Last known employment:* New York City Police Department

16. Identify the “friends” who were told by Dandia of the alleged “infiltration” by the NYPD, and the “FSNYC board member” who decided to be less active with the organization out of concern that the organization was infiltrated, as alleged in ¶ 93 of the complaint.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, Privacy, Vagueness, NYPD Record, and Custody. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants

re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff responds as follows with respect to the “FSNYC board member” who decided to be less active with the organization out of concern that the organization was infiltrated, as alleged in ¶ 93 of the complaint:

Talal Syed

17. Identify the persons present at the “Napoleon event” referred to in ¶ 95 of the complaint, including but not limited to, all speakers, invitees, and attendees.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, First Amendment, Privacy, Vagueness, and Custody. Plaintiff further objects that it is impossible for him to identify all invitees and attendees at this public event. Plaintiff further objects that the invitees and attendees at the event have a First Amendment right to privacy in the fact of their attendance at the event. Subject to and without waiving or limiting any objections, Plaintiff responds as follows with respect to speakers:

Mutah Beale (a/k/a “Napoleon”)

*Last known address:* unknown

*Last known place of employment:* unknown

Mohammed Butt

18. Identify all members who told Dandia that they would cease their activities with FSNYC “largely because they were fearful of being spied upon by an NYPD Informant” as alleged in ¶ 95 of the complaint.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, First Amendment, and Privacy. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff responds that the following FSNYC board member told Dandia that he would cease his activities with FSNYC largely because he was fearful of being spied upon by an NYPD informant:

Talal Syed

19. Identify the members of Muslims Giving Back who were gathered together outside Masjid Omar in September 2012, and the “friend” who attempted to end the conversation with Rahman, as alleged in ¶¶ 101 and 102.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, First Amendment, Privacy, and Vagueness. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

20. Identify all persons inside Masjid Omar whom Rahman attempted to engage in discussions concerning political developments in the Middle East in September 2012, including all persons who left, “saying that they were not comfortable having the discussion”, as alleged in ¶ 102 of the complaint.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, First Amendment, Privacy, and Vagueness. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

21. Identify all persons who told Dandia that “Rahman was a ‘spy’” as alleged in ¶ 103 of the complaint.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, and Privacy. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

22. Identify the religious leader at Masjid Omar who asked plaintiff Dandia to stop posting and soliciting donations at Masjid Omar after Friday services as alleged in ¶ 106 of the complaint.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden and Relevance. Subject to and without waiving or limiting any objections, Plaintiff responds as

follows:

Imam Shariful Islam

*Last known address: unknown*

*Last known place of employment: Islamic Center of Brighton Beach*

23. Identify the religious leader at Masjid Omar who asked Dandia to stop holding meetings and bringing new people to Masjid Omar, as alleged in ¶ 108 of the complaint.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden and Relevance. Subject to and without waiving or limiting any objections, Plaintiff responds as follows:

Imam Shariful Islam

*Last known address: unknown*

*Last known place of employment: Islamic Center of Brighton Beach*

24. Identify the web pages where Muslims Giving Back posted online pictures, as alleged in ¶ 110 of the complaint.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden and Relevance. Subject to and without waiving or limiting any objections, Plaintiff responds as follows:

<https://www.facebook.com/muslims.givingback>

<https://www.facebook.com/pages/Muslims-Giving-Back/367920049953056>

<http://muslimsgivingback.wordpress.com>

<http://muslimsgivingback.org>

<http://instagram.com/muslimsgivingback>

<https://twitter.com/MuslimsGiving>

25. Identify the members of Muslims Giving Back who were allegedly concerned with drawing attention from law enforcement after promulgation of Rahman's identify [sic], as alleged in ¶ 110 of the complaint.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden,

Relevance, First Amendment, and Privacy. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff responds as follows with respect to current and former board members of FSNYC/Muslims Giving Back who were concerned with drawing attention from law enforcement after promulgation of Rahman's identity, as alleged in ¶ 110 of the complaint:

Asad Dandia

Mohamed Bahi

Talal Syed

**To All Plaintiffs:**

49. Identify all persons who provided plaintiffs with documents or communications concerning surveillance or investigations by the NYPD of plaintiffs or other Muslims, and the nature of the information provided.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, Vagueness, Privacy, Privilege, and NYPD/Public Record. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiffs further object to this Interrogatory to the extent it seeks “the nature of the information provided,” as the request is vague and imposes an obligation on Plaintiff beyond what Local Rule 26.3 allows. Plaintiff further objects on the basis of Privilege to the extent Defendants seek information regarding documents or communications exchanged between Plaintiffs and Plaintiffs’ counsel, including attorneys and support staff from the American Civil Liberties Union (“ACLU”), New York Civil Liberties Union (“NYCLU”), and CLEAR project of CUNY School of Law (“CLEAR”), and to the extent Defendants seek documents or communications prepared by or for Plaintiff or Plaintiff’s counsel in anticipation of litigation or for trial in this case. Plaintiff further objects on the basis of NYPD/Public Record to the extent Defendants seek information regarding documents or communications that have been made publicly available in media reports. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

50. Identify all purported NYPD Informants who communicated with plaintiffs, plaintiffs’ congregants, or plaintiffs’ members, donors or attendees concerning surveillance or investigations of plaintiffs by the NYPD.



**Response:** Plaintiff objects on the basis of Undue Burden, Vagueness, Custody, and NYPD/Public Record. Plaintiff further objects on the basis of NYPD/Public Record and Custody because he is not in a position to know all individuals who were or are NYPD Informants and will not speculate as to who has been acting as NYPD Informants. Plaintiff also objects on the basis of Custody because he is not in the position to know “all” NYPD Informants who communicated with plaintiffs’ “congregants,” “members,” “donors,” or “attendees” concerning surveillance or investigations of plaintiffs by the NYPD. Subject to and without waiving or limiting any objections, Plaintiff responds as follows:

Shamiur Rahman

51. Identify all founding members, leaders, Imams, assistant Imams, clergy, cleriq, heads of security, board members, and directors of plaintiffs Masjid Al-Ansar, Masjid At-Taqwa and Muslims Giving Back.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Custody, and Vagueness. Plaintiff refers Defendants to the objections and responses of the organizational plaintiffs, who are the appropriate parties to respond to this Interrogatory. To the extent that the Interrogatory is directed to Plaintiff, Plaintiff objects on the basis of unreasonable cumulativeness and duplicativeness.

52. Describe the current organizational structure of Muslims Giving Back, Masjid Al-Ansar and Masjid At-Taqwa, and identify the current leadership, head of security, board members, officers, and executives.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, First Amendment, Custody, Privacy, and Vagueness. Plaintiff refers Defendants to the objections and responses of the organizational plaintiffs, who are the appropriate parties to respond to this Interrogatory. To the extent that the Interrogatory is directed to Plaintiff, Plaintiff objects on the basis of unreasonable cumulativeness and duplicativeness.

53. Identify all fundraising events and activities held or organized by plaintiffs and the amounts collected from each event.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Privacy, First Amendment, Custody, and Vagueness. Plaintiff refers Defendants to the objections and responses of the organizational plaintiffs, who are the appropriate parties to respond to this Interrogatory. To the extent that the Interrogatory is directed to Plaintiff, Plaintiff objects on the basis of unreasonable cumulativeness and duplicativeness.

54. Identify all persons at Muslims Giving Back, Masjid Al-Ansar and Masjid At-Taqwa whose duties and responsibilities include the management or handling of its finances, including but not limited to, the maintenance of books and records; payment of expenses; or the collection of revenue or donations.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Privacy, First Amendment, Custody, and Vagueness. Plaintiff refers Defendants to the objections and responses of the organizational plaintiffs, who are the appropriate parties to respond to this Interrogatory. To the extent that the Interrogatory is directed to Plaintiff, Plaintiff objects on the basis of unreasonable cumulativeness and duplicativeness.

55. Identify any and all employers of plaintiffs Raza, Dandia, and Elshinawy, both past and present, including the name, telephone number and address of each employer and the dates (month and year) of each employment.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Privacy, and Vagueness. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiff further objects to the Interrogatory because it is harassing and imposes an obligation on Plaintiff beyond what Local Rule 26.3 allows. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

56. Identify each occasion, if any, on which plaintiffs Raza, Dandia, and Elshinawy have been arrested, including the (i) date and location of the arrest, (ii) all charges for which the person was arrested, and (iii) the disposition of each charge (including expunged). This request includes all arrests in any jurisdiction.

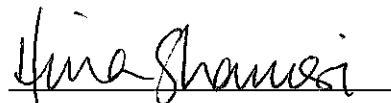
**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, NYPD/Public Record, and Vagueness. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiff further objects to the Interrogatory because it is harassing. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

57. Identify any and all additional names, legal names, illegal names, aliases, former/prior names, birth names, business names, doing-business-as names, nicknames, if any, ever used by plaintiffs.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, NYPD/Public Record, and Vagueness. Subject to and without waiving or limiting any objections, Plaintiff responds as follows with respect to himself:

Nicknames: "Ace" or "Ace Khurasaan"

Dated: April 22, 2014



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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

HAMID HASSAN RAZA; MASJID AL-ANSAR;  
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in his official capacity as Mayor of the City of New  
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DAVID COHEN, in his official capacity as Deputy  
Commissioner of Intelligence for the City of New York,

Defendants.

No. 13-cv-03448-PKC-JMA

Hon. Judge Pamela Chen


VERIFICATION

I, Asad Dandia, declare that I am a plaintiff in the above-captioned lawsuit. I have reviewed the attached Plaintiffs' First Set of Supplemental Responses and Objections to Defendants' First Set of Interrogatories and Requests for Production of Documents and state that to the best of my knowledge the factual responses provided therein that relate to me and Muslims Giving Back are true, except to the matters therein stated to be alleged on information and belief and as to those matters, I believe them to be true to the extent that those matters relate to me and Muslims Giving Back.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATE: 4/18/14

New York, New York



ASAD DANDIA

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

HAMID HASSAN RAZA; MASJID AL-ANSAR;  
ASAD DANDIA; MUSLIMS GIVING BACK;  
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**PLAINTIFFS' FIRST SET OF SUPPLEMENTAL RESPONSES AND OBJECTIONS TO  
DEFENDANTS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS:**

**INTERROGATORY RESPONSES OF  
MOHAMMAD ELSHINAWY**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff MOHAMMAD ELSHINAWY ("Plaintiff") submits the following supplemental responses and objections to the interrogatories set forth in Defendants' First Set of Interrogatories and Requests for Production of Documents, dated December 6, 2013 ("Interrogatories").<sup>1</sup>

**GENERAL RESPONSES AND OBJECTIONS**

1. These general objections apply to each of the Interrogatories. To the extent that certain of these general objections are cited in response to a particular Interrogatory, these

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<sup>1</sup> Additional supplemental responses and objections to Defendants' First Set of Interrogatories and Requests for Production of Documents by each of the Plaintiffs are being served on Defendants concurrently with this response.

specific citations are provided because they are believed to be particularly applicable to the Interrogatory and are not to be construed as a waiver of any other general objection applicable to information or documents falling within the scope of the Interrogatory.

2. This response is based on Plaintiffs' knowledge of the facts and information presently available. Plaintiffs have not completed their discovery, investigation, and preparation for trial in this matter.

3. Plaintiffs object to the Interrogatories to the extent that they are overbroad, call for speculation, call for narrative answers, and/or seek information or documents that are not relevant to the subject matter of this action and are not reasonably calculated to lead to the discovery of admissible evidence. The shorthand "**Relevance**" is used to refer to this objection in response to particular Interrogatories.

4. Plaintiffs object to the Interrogatories to the extent that a complete response by Plaintiffs requires production of information in the possession of Defendants, information that Defendants are in a superior position to know or ascertain, or information that is publicly available. The shorthand "**NYPD Record,**" "**Public Record,**" or "**NYPD/Public Record**" is used to refer to this objection in response to particular Interrogatories.

5. Plaintiffs object to the Interrogatories to the extent that they are overly broad, unduly burdensome, and oppressive. Plaintiffs further object to the Interrogatories to the extent that the scope and the total number of Interrogatories, including multi-part Interrogatories, are also improper, unduly burdensome, oppressive, and overbroad. The shorthand "**Undue Burden**" is used to refer to this objection in response to particular Interrogatories.

6. Plaintiffs object to the Interrogatories to the extent that they seek information or documents protected from disclosure by the attorney-client privilege, the joint defense and/or

common interest privilege, the work-product doctrine, or any other privilege, doctrine or immunity. The shorthand “**Privilege**” is used to refer to this objection in response to particular Interrogatories.

7. Plaintiffs object to the Interrogatories to the extent that they seek information or documents that violate, implicate, or burden the First Amendment interests of Plaintiffs or Plaintiffs’ members, congregants, worshippers, or donors, or others, including the associational privacy of the members and donors of organizational plaintiffs. The shorthand “**First Amendment**” is used to refer to this objection in response to particular Interrogatories.

8. Plaintiffs object to the Interrogatories to the extent that they seek information or documents that raise significant privacy concerns and/or concerns of perpetuating the very harms that Plaintiffs have sued to prevent. The shorthand “**Privacy**” is used to refer to this objection in response to particular Interrogatories.

9. Plaintiffs object to the Interrogatories to the extent they are posed without a time limitation, vague, ambiguous, and/or susceptible to numerous interpretations, and/or to the extent that they misconstrue language from the Complaint dated June 18, 2013. In such instances, Plaintiffs have adopted a reasonable time limitation and/or interpretation for the Interrogatory, and answered accordingly. The shorthand “**Vagueness**” is used to refer to this objection in response to particular Interrogatories.

10. Plaintiffs object to the Interrogatories to the extent that they purport to seek information or documents not within Plaintiffs’ possession, custody or control. The shorthand “**Custody**” is used to refer to this objection in response to particular Interrogatories.

11. Plaintiffs object to the Interrogatories to the extent that they seek each and every fact supporting specific allegations. Plaintiffs’ response is limited to material facts and is not a



detailed or exhaustive listing of all evidence that could be offered at trial.

12. Plaintiffs object to the Interrogatories to the extent that they call for a legal conclusion or questions of pure law separate and apart from the facts of this case.

13. Plaintiffs object to the Interrogatories as overbroad and unduly burdensome in that they are not limited in time and thus exceed the relevant timeframe of the acts giving rise to the claims and defenses alleged in this matter. The Interrogatories call for information that is neither relevant to the prosecution or defense of any claim asserted in this action nor reasonably calculated to lead to the discovery of admissible evidence.

14. Plaintiffs object to the Interrogatories to the extent that they purport to impose upon Plaintiffs obligations inconsistent with or in addition to those set forth in the Federal Rules of Civil Procedure or in the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York. Plaintiffs object to the Defendants' instructions and definitions to the extent they impose broader definitions or rules of constructions than are set forth in Local Rule 26.3. Plaintiffs further object to the Defendants' Interrogatories to the extent that the Interrogatories and all discrete subparts exceed the numerical limitation on Interrogatories imposed by Federal Rule of Civil Procedure 33.

15. This response is made without prejudice to Plaintiffs' expressly reserved right to supplement, modify, or amend these responses and objections as appropriate.

## **RESPONSES AND OBJECTIONS**

### **To Mohammad Elshinawy Only:**

40. Identify all persons who warned Elshinawy that the NYPD had questioned them about Elshinawy or had had asked them to inform on the contents of his religious lessons and sermons, as alleged in ¶ 136 of the complaint.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Vagueness, and

Privacy. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

41. Identify the “young man” who told Elshinawy that NYPD officers had offered to pay him to be an informant, as alleged in ¶ 141.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, and Privacy. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff responds as follows:

Plaintiff Elshinawy will make inquiries to determine the name of the young man who told him that NYPD officers had offered to pay him to be an informant, as alleged in ¶ 141, and will provide that information if available.

42. Identify all “other NYPD agents in Mr. Elshinawy’s immediate circles” as alleged in ¶ 148 of the complaint.

**Response:** Plaintiff objects on the basis of Undue Burden, NYPD/Public Record, Custody, and Vagueness. The agents referenced in ¶ 148 of the complaint include those described in ¶¶ 138-39, 140, and 142 of the complaint. In addition, Mr. Elshinawy may not know the identities of all the NYPD agents in his circles. Subject to and without waiving or limiting any objections, Plaintiff responds as follows:

Shamiur Rahman

*Last known address:* unknown

*Last known place of employment:* New York City Police Department

Kamil Pasha

*Last known address:* unknown

*Last known place of employment:* New York City Police Department

On information and belief, Bilal, Last Name Unknown

*Last known address:* unknown

*Last known place of employment:* unknown

43. Identify all persons or entities whose relationship with Elshinawy has purportedly been affected by NYPD surveillance, including but not limited to: persons in Elshinawy’s audiences;

“longtime friends” who have stopped attending his sermons; “longtime friends” who have stopped associating with Elshinawy; and any other person who reduced their contact or association with Elshinawy by reason of his being the subject of surveillance or investigation by the NYPD, as alleged in ¶¶ 149-152.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Privacy, Vagueness, and First Amendment. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

44. Identify all Brooklyn Islamic Center (“BIC”) leaders who expressed fear or concern of being scrutinized by the NYPD as a result of surveillance or investigation of Elshinawy by the NYPD.

**Response:** Plaintiff objects on the basis of Privacy, Undue Burden, Relevance, Vagueness, Custody, and First Amendment. Plaintiff further objects on the basis of Vagueness to the term “BIC leaders.” Plaintiff further objects on the basis of Custody because he may not know the identities of all BIC leaders who “expressed fear or concern of being scrutinized by the NYPD as a result of surveillance or investigation of Elshinawy by the NYPD.” Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

45. Identify all founding members of Masjid Al-Ansar who purportedly discouraged Elshinawy from holding a leadership position or serving on the mosque’s board due to concerns that Elshinawy was the subject of surveillance or investigation by the NYPD, as alleged in ¶ 155 of the complaint.

**Response:** Plaintiff objects on the basis of Privacy, Undue Burden, Relevance, First Amendment, and Vagueness. Plaintiff further objects on the basis of Vagueness to the term “founding members.” Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

46. Identify all persons who informed Elshinawy that the Brooklyn Islamic Center canceled summer camping trips that Elshinawy wished to organize due to concerns that Elshinawy was the subject of surveillance or investigation by the NYPD, as alleged in ¶¶ 157 and 158 of the complaint.

**Response:** Plaintiff objects on the basis of Privacy, Undue Burden, Relevance, First Amendment, and Vagueness. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff responds to this interrogatory with information designated Attorneys Eyes Only pursuant to the Stipulation and Protective Order for the Production and Exchange of Confidential Materials dated March 20, 2014, which is provided in an Addendum hereto.

47. Identify all Brooklyn Islamic Center event organizers who purportedly wanted to avoid drawing a large attendance to the lecture of a “prominent Islamic scholar” for fear of prompting NYPD surveillance or who relayed that information to Elshinawy, or who forbade Elshinawy from helping to advertise events hosted by the Brooklyn Islamic Center due to concerns that Elshinawy was the subject of surveillance or investigation by the NYPD, as alleged in ¶ 159 of the complaint.

**Response:** Plaintiff objects on the basis of Privacy, Undue Burden, Relevance, First Amendment, and Vagueness. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

48. Identify the dates of Elshinawy’s last visit to Masjid At-Taqwa and Masjid Al-Ansar.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, First Amendment, and Vagueness. Plaintiff further objects to this Interrogatory because it is multi-part. Subject to and without waiving or limiting any objections, Plaintiff responds as follows:

As of January 3, 2014, Mr. Elshinawy last visited Masjid At-Taqwa on either September 29, 2013, or October 4, 2013.

As of January 3, 2014, Mr. Elshinawy last visited Masjid Al-Ansar on January 2, 2014.

Plaintiff Elshinawy will not continue to update Defendants on his comings and goings from Masjid At-Taqwa and Masjid Al-Ansar.

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**To All Plaintiffs:**

49. Identify all persons who provided plaintiffs with documents or communications concerning surveillance or investigations by the NYPD of plaintiffs or other Muslims, and the nature of the information provided.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, Vagueness, Privacy, Privilege, and NYPD/Public Record. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiffs further object to this Interrogatory to the extent it seeks “the nature of the information provided,” as the request is vague and imposes an obligation on Plaintiff beyond what Local Rule 26.3 allows. Plaintiff further objects on the basis of Privilege to the extent Defendants seek information regarding documents or communications exchanged between Plaintiffs and Plaintiffs’ counsel, including attorneys and support staff from the American Civil Liberties Union (“ACLU”), New York Civil Liberties Union (“NYCLU”), and CLEAR project of CUNY School of Law (“CLEAR”), and to the extent Defendants seek documents or communications prepared by or for Plaintiff or Plaintiff’s counsel in anticipation of litigation or for trial in this case. Plaintiff further objects on the basis of NYPD/Public Record to the extent Defendants seek information regarding documents or communications that have been made publicly available in media reports. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

50. Identify all purported NYPD Informants who communicated with plaintiffs, plaintiffs’ congregants, or plaintiffs’ members, donors or attendees concerning surveillance or investigations of plaintiffs by the NYPD.

**Response:** Plaintiff objects on the basis of Undue Burden, Vagueness, Custody, and NYPD/Public Record. Plaintiff further objects on the basis of NYPD/Public Record and Custody because he is not in a position to know all individuals who were or are NYPD Informants and will not speculate as to who has been acting as NYPD Informants. Plaintiff also objects on the basis of Custody because he is not in the position to know “all” NYPD Informants who communicated with plaintiffs’ “congregants,” “members,” “donors,” or “attendees” concerning surveillance or investigations of plaintiffs by the NYPD. Subject to and without waiving or limiting any objections, Plaintiff responds as follows:

On information and belief, Shamiur Rahman communicated with one or more of Plaintiff Elshinawy’s congregants about NYPD surveillance.

51. Identify all founding members, leaders, Imams, assistant Imams, clergy, cleriq, heads of security, board members, and directors of plaintiffs Masjid Al-Ansar, Masjid At-Taqwa and Muslims Giving Back.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Custody, and Vagueness. Plaintiff refers Defendants to the objections and responses of the organizational plaintiffs, who are the appropriate parties to respond to this Interrogatory. To the extent that the Interrogatory is directed to Plaintiff, Plaintiff objects on the basis of unreasonable cumulativeness and duplicativeness.

52. Describe the current organizational structure of Muslims Giving Back, Masjid Al-Ansar and Masjid At-Taqwa, and identify the current leadership, head of security, board members, officers, and executives.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, First Amendment, Privacy, Vagueness, and Custody. Plaintiff refers Defendants to the objections and responses of the organizational plaintiffs, who are the appropriate parties to respond to this Interrogatory. To the extent that the Interrogatory is directed to Plaintiff, Plaintiff objects on the basis of unreasonable cumulativeness and duplicativeness.



53. Identify all fundraising events and activities held or organized by plaintiffs and the amounts collected from each event.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Privacy, First Amendment, Vagueness, and Custody. Plaintiff refers Defendants to the objections and responses of the organizational plaintiffs, who are the appropriate parties to respond to this Interrogatory. To the extent that the Interrogatory is directed to Plaintiff, Plaintiff objects on the basis of unreasonable cumulativeness and duplicativeness.

54. Identify all persons at Muslims Giving Back, Masjid Al-Ansar and Masjid At-Taqwa whose duties and responsibilities include the management or handling of its finances, including but not limited to, the maintenance of books and records; payment of expenses; or the collection of revenue or donations.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Privacy, First Amendment, Vagueness, and Custody. Plaintiff refers Defendants to the objections and responses of the organizational plaintiffs, who are the appropriate parties to respond to this Interrogatory. To the extent that the Interrogatory is directed to Plaintiff, Plaintiff objects on the basis of unreasonable cumulativeness and duplicativeness.

55. Identify any and all employers of plaintiffs Raza, Dandia, and Elshinawy, both past and present, including the name, telephone number and address of each employer and the dates (month and year) of each employment.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Privacy, and Vagueness. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiff further objects to this Interrogatory because it is harassing and imposes an obligation on Plaintiff beyond what Local Rule 26.3 allows. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

56. Identify each occasion, if any, on which plaintiffs Raza, Dandia, and Elshinawy have been arrested, including the (i) date and location of the arrest, (ii) all charges for which the person was arrested, and (iii) the disposition of each charge (including expunged). This request includes all arrests in any jurisdiction.



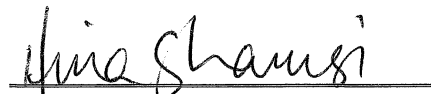
**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, NYPD/Public Record, and Vagueness. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiff further objects to this Interrogatory because it is harassing. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

57. Identify any and all additional names, legal names, illegal names, aliases, former/prior names, birth names, business names, doing-business-as names, nicknames, if any, ever used by plaintiffs.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, NYPD/Public Record, and Vagueness. Subject to and without waiving or limiting any objections, Plaintiff responds as follows with respect to himself:

“Abu Abbaad”

Dated: April 21, 2014



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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

HAMID HASSAN RAZA; MASJID AL-ANSAR;  
ASAD DANDIA; MUSLIMS GIVING BACK;  
MASJID AT-TAQWA; MOHAMMAD ELSHINAWY,

Plaintiffs,

v.

CITY OF NEW YORK; MICHAEL R. BLOOMBERG,  
in his official capacity as Mayor of the City of New  
York; RAYMOND W. KELLY, in his official capacity  
as Police Commissioner for the City of New York;  
DAVID COHEN, in his official capacity as Deputy  
Commissioner of Intelligence for the City of New York,

Defendants.

No. 13-cv-03448-PKC-JMA

Hon. Judge Pamela Chen

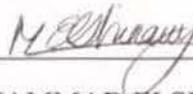
VERIFICATION

I, Mohammad Elshinawy, declare that I am a plaintiff in the above-captioned lawsuit. I have reviewed the attached Plaintiff's First Set of Supplemental Responses and Objections to Defendants' First Set of Interrogatories and Requests for Production of Documents and state that to the best of my knowledge the factual responses provided therein that relate to me are true.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATE: 4/21/2014

New York, New York



MOHAMMAD ELSHINAWY

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

HAMID HASSAN RAZA; MASJID AL-ANSAR;  
ASAD DANDIA; MUSLIMS GIVING BACK;  
MASJID AT-TAQWA; MOHAMMAD ELSHINAWY,

Plaintiffs,

v.

CITY OF NEW YORK; MICHAEL R. BLOOMBERG,  
in his official capacity as Mayor of the City of New  
York; RAYMOND W. KELLY, in his official capacity  
as Police Commissioner for the City of New York;  
DAVID COHEN, in his official capacity as Deputy  
Commissioner of Intelligence for the City of New York,

Defendants.

No. 13-cv-03448-PKC-JMA

Hon. Judge Pamela Chen  
Hon. Judge Joan Azrack

**PLAINTIFFS' FIRST SET OF SUPPLEMENTAL RESPONSES AND OBJECTIONS TO  
DEFENDANTS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS:**

**INTERROGATORY RESPONSES OF  
MUSLIMS GIVING BACK**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Muslims Giving Back ("Plaintiff") submits the following supplemental responses and objections to the interrogatories set forth in Defendants' First Set of Interrogatories and Requests for Production of Documents, dated December 6, 2013 ("Interrogatories").<sup>1</sup>

**GENERAL RESPONSES AND OBJECTIONS**

1. These general objections apply to each of the Interrogatories. To the extent that certain of these general objections are cited in response to a particular Interrogatory, these

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<sup>1</sup> Additional supplemental responses and objections to Defendants' First Set of Interrogatories and Requests for Production of Documents by each of the Plaintiffs are being served on Defendants concurrently with this response.

specific citations are provided because they are believed to be particularly applicable to the Interrogatory and are not to be construed as a waiver of any other general objection applicable to information or documents falling within the scope of the Interrogatory.

2. This response is based on Plaintiffs' knowledge of the facts and information presently available. Plaintiffs have not completed their discovery, investigation, and preparation for trial in this matter.

3. Plaintiffs object to the Interrogatories to the extent that they are overbroad, call for speculation, call for narrative answers, and/or seek information or documents that are not relevant to the subject matter of this action and are not reasonably calculated to lead to the discovery of admissible evidence. The shorthand "**Relevance**" is used to refer to this objection in response to particular Interrogatories.

4. Plaintiffs object to the Interrogatories to the extent that a complete response by Plaintiffs requires production of information in the possession of Defendants, information that Defendants are in a superior position to know or ascertain, or information that is publicly available. The shorthand "**NYPD Record,**" "**Public Record,**" or "**NYPD/Public Record**" is used to refer to this objection in response to particular Interrogatories.

5. Plaintiffs object to the Interrogatories to the extent that they are overly broad, unduly burdensome, and oppressive. Plaintiffs further object to the Interrogatories to the extent that the scope and the total number of Interrogatories, including multi-part Interrogatories, are also improper, unduly burdensome, oppressive, and overbroad. The shorthand "**Undue Burden**" is used to refer to this objection in response to particular Interrogatories.

6. Plaintiffs object to the Interrogatories to the extent that they seek information or documents protected from disclosure by the attorney-client privilege, the joint defense and/or

common interest privilege, the work-product doctrine, or any other privilege, doctrine or immunity. The shorthand “**Privilege**” is used to refer to this objection in response to particular Interrogatories.

7. Plaintiffs object to the Interrogatories to the extent that they seek information or documents that violate, implicate, or burden the First Amendment interests of Plaintiffs or Plaintiffs’ members, congregants, worshippers, or donors, or others, including the associational privacy of the members and donors of organizational plaintiffs. The shorthand “**First Amendment**” is used to refer to this objection in response to particular Interrogatories.

8. Plaintiffs object to the Interrogatories to the extent that they seek information or documents that raise significant privacy concerns and/or concerns of perpetuating the very harms that Plaintiffs have sued to prevent. The shorthand “**Privacy**” is used to refer to this objection in response to particular Interrogatories.

9. Plaintiffs object to the Interrogatories to the extent they are posed without a time limitation, vague, ambiguous, and/or susceptible to numerous interpretations, and/or to the extent that they misconstrue language from the Complaint dated June 18, 2013. In such instances, Plaintiffs have adopted a reasonable time limitation and/or interpretation for the Interrogatory, and answered accordingly. The shorthand “**Vagueness**” is used to refer to this objection in response to particular Interrogatories.

10. Plaintiffs object to the Interrogatories to the extent that they purport to seek information or documents not within Plaintiffs’ possession, custody or control. The shorthand “**Custody**” is used to refer to this objection in response to particular Interrogatories.

11. Plaintiffs object to the Interrogatories to the extent that they seek each and every fact supporting specific allegations. Plaintiffs’ response is limited to material facts and is not a

detailed or exhaustive listing of all evidence that could be offered at trial.

12. Plaintiffs object to the Interrogatories to the extent that they call for a legal conclusion or questions of pure law separate and apart from the facts of this case.

13. Plaintiffs object to the Interrogatories as overbroad and unduly burdensome in that they are not limited in time and thus exceed the relevant timeframe of the acts giving rise to the claims and defenses alleged in this matter. The Interrogatories call for information that is neither relevant to the prosecution or defense of any claim asserted in this action nor reasonably calculated to lead to the discovery of admissible evidence.

14. Plaintiffs object to the Interrogatories to the extent that they purport to impose upon Plaintiffs obligations inconsistent with or in addition to those set forth in the Federal Rules of Civil Procedure or in the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York. Plaintiffs object to the Defendants' instructions and definitions to the extent they impose broader definitions or rules of constructions than are set forth in Local Rule 26.3. Plaintiffs further object to the Defendants' Interrogatories to the extent that the Interrogatories and all discrete subparts exceed the numerical limitation on Interrogatories imposed by Federal Rule of Civil Procedure 33.

15. This response is made without prejudice to Plaintiffs' expressly reserved right to supplement, modify, or amend these responses and objections as appropriate.

## **RESPONSES AND OBJECTIONS**

### **Interrogatories 11 – 25:**

Plaintiff objects on the basis of unreasonable cumulativeness or duplicativeness to the extent that these Interrogatories are directed to Plaintiff Muslims Giving Back in addition to Plaintiff Asad Dandia. Plaintiff Dandia has personal knowledge of information responsive to

Interrogatories 11–25 and will provide responses and objections to those Interrogatories. With respect to Interrogatories 11–25, Plaintiff refers Defendants to the objections and responses that Plaintiff Dandia has provided.



**To All Plaintiffs:**

49. Identify all persons who provided plaintiffs with documents or communications concerning surveillance or investigations by the NYPD of plaintiffs or other Muslims, and the nature of the information provided.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, Vagueness, Privacy, Privilege, and NYPD/Public Record. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiffs further object to this Interrogatory to the extent it seeks “the nature of the information provided,” as the request is vague and imposes an obligation on Plaintiff beyond what Local Rule 26.3 allows. Plaintiff further objects on the basis of Privilege to the extent Defendants seek information regarding documents or communications exchanged between Plaintiffs and Plaintiffs’ counsel, including attorneys and support staff from the American Civil Liberties Union (“ACLU”), New York Civil Liberties Union (“NYCLU”), and CLEAR project of CUNY School of Law (“CLEAR”), and to the extent Defendants seek documents or communications prepared by or for Plaintiff or Plaintiff’s counsel in anticipation of litigation or for trial in this case. Plaintiff further objects on the basis of NYPD/Public Record to the extent Defendants seek information regarding documents or communications that have been made publicly available in media reports. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

50. Identify all purported NYPD Informants who communicated with plaintiffs, plaintiffs’ congregants, or plaintiffs’ members, donors or attendees concerning surveillance or investigations of plaintiffs by the NYPD.

**Response:** Plaintiff objects on the basis of Undue Burden, Vagueness, Custody, and NYPD/Public Record. Plaintiff further objects on the basis of NYPD/Public Record and Custody because it is not in a position to know all individuals who were or are NYPD Informants and will not speculate as to who has been acting as NYPD Informants. Plaintiff also objects on the basis of Custody because it is not in the position to know “all” NYPD Informants who communicated with plaintiffs’ “congregants,” “members,” “donors,” or “attendees” concerning surveillance or investigations of plaintiffs by the NYPD. Subject to and without waiving or limiting any objections, Plaintiff responds as follows:

Shamiur Rahman

*Last known address:* unknown

*Last known place of employment:* New York City Police Department

51. Identify all founding members, leaders, Imams, assistant Imams, clergy, cleriq, heads of security, board members, and directors of plaintiffs Masjid Al-Ansar, Masjid At-Taqwa and Muslims Giving Back.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, Custody, and Vagueness. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiff further objects on the basis of Vagueness to the undefined term “leaders.” Subject to and without waiving or limiting any objections, Plaintiff construes the term “founding” to modify all succeeding nouns in this Interrogatory and responds as follows with respect to the founding board members of Fesabeelillah Services of NYC, Inc.:

Mohammad Butt

*Contact through Plaintiffs’ Counsel*

Asad Dandia

*Contact through Plaintiffs’ Counsel*

Talal Syed

*Contact through Plaintiffs’ Counsel*

52. Describe the current organizational structure of Muslims Giving Back, Masjid Al-Ansar

and Masjid At-Taqwa, and identify the current leadership, head of security, board members, officers, and executives.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, First Amendment, Privacy, Vagueness and Custody. Plaintiff further objects on the basis of Vagueness to the undefined term “leadership” and to the vague request for information about the “current organizational structure.” Subject to and without waiving or limiting any objections, Plaintiff responds that the information provided in Plaintiff’s prior response, dated January 6, 2014, was accurate as of that date. Plaintiff is currently in the process of repopulating its board and responds as follows with respect to current board members of Muslims Giving Back. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory:

Mohammad Mohammad, President  
*Contact through Plaintiffs’ Counsel*

Mohammad Butt, Treasurer

53. Identify all fundraising events and activities held or organized by plaintiffs and the amounts collected from each event.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, Privacy, First Amendment, Custody, and Vagueness. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiff further objects on the basis of Vagueness to the undefined phrase, “fundraising events and activities.” Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

54. Identify all persons at Muslims Giving Back, Masjid Al-Ansar and Masjid At-Taqwa whose duties and responsibilities include the management or handling of its finances, including but not limited to, the maintenance of books and records; payment of expenses; or the collection of revenue or donations.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Privacy, First Amendment, Custody, and Vagueness. Plaintiff objects on the basis of First Amendment and Privacy to the extent that the Interrogatory seeks disclosure of the identities of organizational members who participate in the collection of donations. Subject to and without waiving or limiting any objections, Plaintiff responds as follows with respect to the Muslims Giving Back board members whose duties and responsibilities include management or handling of finances:

Mohammad Butt

Mohammad Mohammad

55. Identify any and all employers of plaintiffs Raza, Dandia, and Elshinawy, both past and present, including the name, telephone number and address of each employer and the dates (month and year) of each employment.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Custody, and Vagueness. Plaintiff refers Defendants to the objections and responses of the individual plaintiffs, who are the appropriate parties to respond to this Interrogatory. To the extent that the Interrogatory is directed to Plaintiff, Plaintiff objects on the basis of unreasonable cumulateness and duplicativeness, and because it is multi-part.

56. Identify each occasion, if any, on which plaintiffs Raza, Dandia, and Elshinawy have been arrested, including the (i) date and location of the arrest, (ii) all charges for which the person was arrested, and (iii) the disposition of each charge (including expunged). This request includes all arrests in any jurisdiction.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, NYPD/Public Record, and Vagueness. Plaintiff refers Defendants to the objections and responses of the individual plaintiffs, who are the appropriate parties to respond to this Interrogatory. To the extent that the Interrogatory is directed to Plaintiff, Plaintiff objects on the basis of unreasonable cumulateness and duplicativeness, and because it is multi-part.

57. Identify any and all additional names, legal names, illegal names, aliases, former/prior names, birth names, business names, doing-business-as names, nicknames, if any, ever used by plaintiffs.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, NYPD/Public Record, and Vagueness. Subject to and without waiving or limiting any objections, Plaintiff responds as follows with respect to Muslims Giving Back:

Fesabeelillah Services of NYC, Inc.

Dated: April 22, 2014



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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

HAMID HASSAN RAZA; MASJID AL-ANSAR;  
ASAD DANDIA; MUSLIMS GIVING BACK;  
MASJID AT-TAQWA; MOHAMMAD ELSHINAWY,

Plaintiffs,

v.

CITY OF NEW YORK; MICHAEL R. BLOOMBERG,  
in his official capacity as Mayor of the City of New  
York; RAYMOND W. KELLY, in his official capacity  
as Police Commissioner for the City of New York;  
DAVID COHEN, in his official capacity as Deputy  
Commissioner of Intelligence for the City of New York,

Defendants.

No. 13-cv-03448-PKC-JMA

Hon. Judge Pamela Chen

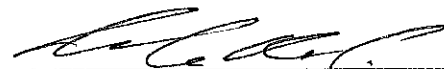
VERIFICATION

I, Mohammad Mohammad, declare that I am an officer of Muslims Giving Back, a plaintiff in the above-captioned lawsuit. I have reviewed the attached Plaintiffs' First Set of Supplemental Responses and Objections to Defendants' First Set of Interrogatories and Requests for Production of Documents and state that to the best of my knowledge the factual responses provided therein that relate to Muslims Giving Back are true, except to the matters therein stated to be alleged on information and belief, and as to those matters, I believe them to be true to the extent that those matters relate to Muslims Giving Back.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATE: 04/18/14

New York, New York



MOHAMMAD MOHAMMAD

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

HAMID HASSAN RAZA; MASJID AL-ANSAR;  
ASAD DANDIA; MUSLIMS GIVING BACK;  
MASJID AT-TAQWA; MOHAMMAD ELSHINAWY,

Plaintiffs,

v.

CITY OF NEW YORK; MICHAEL R. BLOOMBERG,  
in his official capacity as Mayor of the City of New  
York; RAYMOND W. KELLY, in his official capacity  
as Police Commissioner for the City of New York;  
DAVID COHEN, in his official capacity as Deputy  
Commissioner of Intelligence for the City of New York,

Defendants.

No. 13-cv-03448-PKC-JMA

Hon. Judge Pamela Chen  
Hon. Judge Joan Azrack

**PLAINTIFFS' SECOND SET OF SUPPLEMENTAL RESPONSES AND OBJECTIONS  
TO DEFENDANTS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS:**

**INTERROGATORY RESPONSES OF  
HAMID HASSAN RAZA AND MASJID AL-ANSAR**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs Hamid Hassan Raza and Masjid Al-Ansar ("Plaintiffs") submit the following supplemental responses and objections to the interrogatories set forth in Defendants' First Set of Interrogatories and Requests for Production of Documents, dated December 6, 2013 ("Interrogatories").

**GENERAL RESPONSES AND OBJECTIONS**

1. These general objections apply to each of the Interrogatories. To the extent that certain of these general objections are cited in response to a particular Interrogatory, these specific citations are provided because they are believed to be particularly applicable to the

Interrogatory and are not to be construed as a waiver of any other general objection applicable to information or documents falling within the scope of the Interrogatory.

2. This response is based on Plaintiffs' knowledge of the facts and information presently available. Plaintiffs have not completed their discovery, investigation, and preparation for trial in this matter.

3. Plaintiffs object to the Interrogatories to the extent that they are overbroad, call for speculation, call for narrative answers, and/or seek information or documents that are not relevant to the subject matter of this action and are not reasonably calculated to lead to the discovery of admissible evidence. The shorthand "**Relevance**" is used to refer to this objection in response to particular Interrogatories.

4. Plaintiffs object to the Interrogatories to the extent that a complete response by Plaintiffs requires production of information in the possession of Defendants, information that Defendants are in a superior position to know or ascertain, or information that is publicly available. The shorthand "**NYPD Record,**" "**Public Record,**" or "**NYPD/Public Record**" is used to refer to this objection in response to particular Interrogatories.

5. Plaintiffs object to the Interrogatories to the extent that they are overly broad, unduly burdensome, and oppressive. Plaintiffs further object to the Interrogatories to the extent that the scope and the total number of Interrogatories, including multi-part Interrogatories, are also improper, unduly burdensome, oppressive, and overbroad. The shorthand "**Undue Burden**" is used to refer to this objection in response to particular Interrogatories.

6. Plaintiffs object to the Interrogatories to the extent that they seek information or documents protected from disclosure by the attorney-client privilege, the joint defense and/or common interest privilege, the work-product doctrine, or any other privilege, doctrine or



immunity. The shorthand “**Privilege**” is used to refer to this objection in response to particular Interrogatories.

7. Plaintiffs object to the Interrogatories to the extent that they seek information or documents that violate, implicate, or burden the First Amendment interests of Plaintiffs or Plaintiffs’ members, congregants, worshippers, or donors, or others, including the associational privacy of the members and donors of organizational plaintiffs. The shorthand “**First Amendment**” is used to refer to this objection in response to particular Interrogatories.

8. Plaintiffs object to the Interrogatories to the extent that they seek information or documents that raise significant privacy concerns and/or concerns of perpetuating the very harms that Plaintiffs have sued to prevent. The shorthand “**Privacy**” is used to refer to this objection in response to particular Interrogatories.

9. Plaintiffs object to the Interrogatories to the extent they are posed without a time limitation, vague, ambiguous, and/or susceptible to numerous interpretations, and/or to the extent that they misconstrue language from the Complaint dated June 18, 2013. In such instances, Plaintiffs have adopted a reasonable time limitation and/or interpretation for the Interrogatory, and answered accordingly. The shorthand “**Vagueness**” is used to refer to this objection in response to particular Interrogatories.

10. Plaintiffs object to the Interrogatories to the extent that they purport to seek information or documents not within Plaintiffs’ possession, custody or control. The shorthand “**Custody**” is used to refer to this objection in response to particular Interrogatories.

11. Plaintiffs object to the Interrogatories to the extent that they seek each and every fact supporting specific allegations. Plaintiffs’ response is limited to material facts and is not a detailed or exhaustive listing of all evidence that could be offered at trial.

12. Plaintiffs object to the Interrogatories to the extent that they call for a legal conclusion or questions of pure law separate and apart from the facts of this case.

13. Plaintiffs object to the Interrogatories as overbroad and unduly burdensome in that they are not limited in time and thus exceed the relevant timeframe of the acts giving rise to the claims and defenses alleged in this matter. The Interrogatories call for information that is neither relevant to the prosecution or defense of any claim asserted in this action nor reasonably calculated to lead to the discovery of admissible evidence.

14. Plaintiffs object to the Interrogatories to the extent that they purport to impose upon Plaintiffs obligations inconsistent with or in addition to those set forth in the Federal Rules of Civil Procedure or in the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York. Plaintiffs object to the Defendants' instructions and definitions to the extent they impose broader definitions or rules of constructions than are set forth in Local Rule 26.3. Plaintiffs further object to the Defendants' Interrogatories to the extent that the Interrogatories and all discrete subparts exceed the numerical limitation on Interrogatories imposed by Federal Rule of Civil Procedure 33.

15. This response is made without prejudice to Plaintiffs' expressly reserved right to supplement, modify, or amend these responses and objections as appropriate.

## **RESPONSES AND OBJECTIONS**

### **To Masjid Al-Ansar Only:**

1. Identify all persons who decided to record sermons at Masjid Al-Ansar, and the persons involved in the purchase or installation of video or audio recording equipment, as referenced in ¶ 51 of the complaint.

**Response:** Plaintiffs object on the basis of Undue Burden, Relevance, First Amendment, and Privacy. Plaintiffs further object to this Interrogatory because it is multi-part. Plaintiffs

reserve the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff Masjid Al-Ansar responds as follows with respect to all persons “who decided to record sermons at Masjid Al-Ansar, and the persons involved in the purchase or installation of video or audio recording equipment, as referenced in ¶ 51 of the complaint”:

Hamid Hassan Raza  
*Contact through Plaintiffs’ counsel*

Niaz Brohi  
*Contact through Plaintiffs’ counsel*

A Masjid Al-Ansar congregant helped to obtain a discount for some of the equipment.

2. Identify all persons within the mosque leadership who had “heightened concerns” resulting from a 2011 visit from a purported NYPD informant, or who decided to sponsor a civil rights workshop due to these concerns, as alleged in ¶ 55 of the complaint.

**Response:** Plaintiffs object on the basis of Undue Burden and Vagueness. Plaintiffs further object on the basis of Vagueness because Paragraph 55 of the complaint does not discuss a 2011 visit from a purported NYPD informant, but rather discusses a visit from plainclothes NYPD officers, and because of the undefined term “mosque leadership.” Subject to and without waiving or limiting any objections, Plaintiff Masjid Al-Ansar responds as follows:

Hamid Hassan Raza

Ahmed Bhatti  
*Contact through Plaintiffs’ counsel*

Mohsin Raza  
*Contact through Plaintiffs’ counsel*

3. Identify all persons who informed Masjid Al-Ansar or Imam Raza that the man with the “extremely unusual behavior” was an NYPD Informant, as alleged in ¶ 57 of the complaint.

**Response:** Plaintiffs object on the basis of Undue Burden, Relevance, and Vagueness. Plaintiffs further object because the complaint does not allege that any person informed Masjid

Al-Ansar or Imam Raza that the man with the “extremely unusual behavior” was an NYPD informant. Subject to and without waiving or limiting any objections, Plaintiff Masjid Al-Ansar responds as follows:

No one. The allegation in ¶ 57 of the Complaint is based on Imam Raza’s knowledge, experience, and belief.

4. Identify the “young congregants” who showed Imam Raza a Facebook post in which Shamiur Rahman identified himself as an Informant, as alleged in ¶ 58 of the complaint.

**Response:** Plaintiffs object on the basis of Undue Burden, Relevance, Privacy, First Amendment, and Vagueness. Plaintiffs reserve the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff Masjid Al-Ansar responds as follows:

Asad Dandia

*Contact through Plaintiffs’ counsel*

5. Identify the members of Masjid Al-Ansar believed to be surveilled or investigated by the NYPD, as alleged in ¶ 60 of the complaint.

**Response:** Plaintiffs object on the basis of Undue Burden, Relevance, Vagueness, NYPD/Public Record, First Amendment, and Privacy. Plaintiffs further object on the basis of First Amendment and Privacy to the extent the Interrogatory seeks identification of the Masjid’s congregants. Subject to and without waiving or limiting any objections, Plaintiff Masjid Al-Ansar responds as follows:

Masjid Al-Ansar believes that its imam, leadership, and congregants were and are under surveillance from the New York City Police Department (“NYPD”).

6. Identify the congregants whom Imam Raza discouraged from discussing certain religious topics or concepts, as alleged in ¶¶ 62-64.

**Response:** Plaintiffs object on the basis of Undue Burden, Relevance, First Amendment, and Privacy. Plaintiffs reserve the right to supplement, modify, or amend those responses and

objections as appropriate should Defendants re-serve the Interrogatory.

7. Identify the “friend” who warned Imam Raza about the purported practices and teachings of NYPD surveillance teams, as alleged in ¶¶ 69 and 71 of the complaint.

**Response:** Plaintiffs object on the basis of Undue Burden and Relevance. Subject to and without waiving or limiting any objections, Plaintiff Masjid Al-Ansar responds as follows:

Mohammad Elshinawy  
*Contact through Plaintiffs’ counsel*

8. Identify all persons referenced in ¶¶ 73-74 of the complaint, including

- a. Persons who have warned Imam Raza about newcomers or have shared suspicions that newcomers might be police Informants; or
- b. Newcomers who have reacted to this reception with “alarm” or who have told Imam Raza that “the environment at the mosque is hostile to them, that longstanding congregants view newcomers with suspicions, or that newcomers are excluded from many facets of social life at the mosque.”

**Response:** Plaintiffs object on the basis of Undue Burden, Relevance, Vagueness, First Amendment, Privacy, and Custody. Plaintiffs reserve the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

9. Identify all persons who are “constantly worried whether they are safe from police spying” or are “suspicious of their fellow worshippers”, as alleged in ¶ 75 of the complaint.

**Response:** Plaintiffs object on the basis of Undue Burden, Relevance, Vagueness, First Amendment, Privacy, and Custody. Plaintiffs reserve the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

10. Identify all persons referenced in ¶ 76 of the complaint, including persons (a) who grew even more suspicious of newcomers after the Associated Press began reporting on the NYPD’s surveillance; (b) whose fears have increased from the confirmation of NYPD surveillance; (c) who have declined to attend afternoon prayers on weekdays; or (d) who have declined to attend prayers at any time on any day; or (e) who declined to attend the mosque due to surveillance by the NYPD.

**Response:** Plaintiffs object on the basis of Undue Burden, Relevance, Vagueness, First Amendment, Privacy, and Custody. Plaintiffs reserve the right to supplement, modify, or amend

those responses and objections as appropriate should Defendants re-serve the Interrogatory.

**To All Plaintiffs:**

49. Identify all persons who provided plaintiffs with documents or communications concerning surveillance or investigations by the NYPD of plaintiffs or other Muslims, and the nature of the information provided.

**Response:** Plaintiffs object to this Interrogatory on the basis of Undue Burden, Relevance, Vagueness, Privacy, Privilege, and NYPD/Public Record. Plaintiffs further object to this Interrogatory because it is multi-part. Plaintiffs further object to this Interrogatory to the extent it seeks “nature of the information provided,” as the request is vague and imposes an obligation on Plaintiffs beyond what Local Rule 26.3 allows. Plaintiffs further object on the basis of Privilege to the extent Defendants seek information regarding documents or communications exchanged between Plaintiffs and Plaintiffs’ counsel, including attorneys and support staff from the American Civil Liberties Union (“ACLU”), New York Civil Liberties Union (“NYCLU”), and CLEAR project of CUNY School of Law (“CLEAR”), and to the extent Defendants seek documents or communications prepared by or for Plaintiffs or Plaintiffs’ counsel in anticipation of litigation or for trial in this case. Plaintiffs further object on the basis of NYPD/Public Record to the extent Defendants seek information regarding documents or communications that have been made publicly available in media reports. Plaintiffs reserve the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

50. Identify all purported NYPD Informants who communicated with plaintiffs, plaintiffs’ congregants, or plaintiffs’ members, donors or attendees concerning surveillance or investigations of plaintiffs by the NYPD.

**Response:** Plaintiffs object on the basis of Undue Burden, Vagueness, Custody, and NYPD/Public Record. Plaintiffs further object on the basis of NYPD/Public Record and Custody because they are not in a position to know all individuals who were or are NYPD Informants and will not speculate as to who has been acting as NYPD Informants. Plaintiffs also object on the basis of Custody because they are not in the position to know “all” NYPD Informants who communicated with plaintiffs’ “congregants,” “members,” “donors,” or “attendees” concerning surveillance or investigations of plaintiffs by the NYPD. Subject to and without waiving or limiting any objections, Plaintiffs Raza and Masjid Al-Ansar respond as follows, on information and belief:

Shamiur Rahman

*Last known address:* unknown

*Last known employment:* New York City Police Department

51. Identify all founding members, leaders, Imams, assistant Imams, clergy, cleriq, heads of security, board members, and directors of plaintiffs Masjid Al-Ansar, Masjid At-Taqwa and Muslims Giving Back.

**Response:** Plaintiffs object on the basis of Undue Burden, Relevance, Vagueness, and Custody. Plaintiffs further object to this Interrogatory because it is multi-part. Plaintiffs further object on the basis of Vagueness to the undefined term “leaders.” Subject to and without waiving or limiting any objections, and construing the term “founding” in the Interrogatory to modify subsequent nouns, Plaintiff Masjid Al-Ansar responds as follows with respect to initial directors of the corporation:

Niaz Brohi

Ahmed Bhatti

Noor Rabah

*Contact through Plaintiffs’ counsel*

52. Describe the current organizational structure of Muslims Giving Back, Masjid Al-Ansar



and Masjid At-Taqwa, and identify the current leadership, head of security, board members, officers, and executives.

**Response:** Plaintiffs object on the basis of Undue Burden, Relevance, First Amendment, Privacy, Vagueness, and Custody. Plaintiffs further object on the basis of Vagueness to the undefined term “leadership” and to the vague request for information about the “current organizational structure.” Subject to and without waiving or limiting any objections, Plaintiff Masjid Al-Ansar responds that the current Board of Masjid Al-Ansar consists of the following individuals:

Hamid Hassan Raza, President

Mohsin Raza, Treasurer

Bader Suleiman, Vice President  
*Contact through Plaintiffs’ counsel*

Tasawar Janjuah, Secretary  
*Contact through Plaintiffs’ counsel*

53. Identify all fundraising events and activities held or organized by plaintiffs and the amounts collected from each event.

**Response:** Plaintiffs object on the basis of Undue Burden, Relevance, Privacy, First Amendment, Custody, and Vagueness. Plaintiffs further object on the basis of Vagueness to the undefined phrase, “fundraising events and activities.” Plaintiffs reserve the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

54. Identify all persons at Muslims Giving Back, Masjid Al-Ansar and Masjid At-Taqwa whose duties and responsibilities include the management or handling of its finances, including but not limited to, the maintenance of books and records; payment of expenses; or the collection of revenue or donations.

**Response:** Plaintiffs object on the basis of Undue Burden, Relevance, Privacy, First Amendment, Custody, and Vagueness. Plaintiffs further object on the basis of First Amendment

and Privacy to the extent that the Interrogatory seeks disclosure of the identities of organizational members who participate in the collection of donations. Subject to and without waiving or limiting any objections, Plaintiff Masjid Al-Ansar responds as follows with respect to its board members whose duties and responsibilities include management or handling of finances:

Mohsin Raza

Bader Suleiman

55. Identify any and all employers of plaintiffs Raza, Dandia, and Elshinawy, both past and present, including the name, telephone number and address of each employer and the dates (month and year) of each employment.

**Response:** Plaintiffs object on the basis of Undue Burden, Relevance, Privacy, and Vagueness. Plaintiffs further object to this Interrogatory because it is multi-part. Plaintiffs further object to this Interrogatory because it is harassing and imposes an obligation on Plaintiffs beyond what Local Rule 26.3 allows. Plaintiffs reserve the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

56. Identify each occasion, if any, on which plaintiffs Raza, Dandia, and Elshinawy have been arrested, including the (i) date and location of the arrest, (ii) all charges for which the person was arrested, and (iii) the disposition of each charge (including expunged). This request includes all arrests in any jurisdiction.

**Response:** Plaintiffs object on the basis of Undue Burden, Relevance, NYPD/Public Record, and Vagueness. Plaintiffs further object to this Interrogatory because it is multi-part. Plaintiffs further object to this Interrogatory because it is harassing. Plaintiffs reserve the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

57. Identify any and all additional names, legal names, illegal names, aliases, former/prior names, birth names, business names, doing-business-as names, nicknames, if any, ever used by plaintiffs.

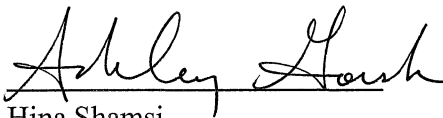
**Response:** Plaintiffs object on the basis of Undue Burden, Relevance, NYPD/Public

Record, and Vagueness. Subject to and without waiving or limiting any objections, Plaintiffs

Raza and Masjid Al-Ansar respond as follows:

None.

Dated: July 7, 2014



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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

HAMID HASSAN RAZA; MASJID AL-ANSAR;  
ASAD DANDIA; MUSLIMS GIVING BACK;  
MASJID AT-TAQWA; MOHAMMAD ELSHINAWY,

Plaintiffs,

v.

CITY OF NEW YORK; MICHAEL R. BLOOMBERG,  
in his official capacity as Mayor of the City of New  
York; RAYMOND W. KELLY, in his official capacity  
as Police Commissioner for the City of New York;  
DAVID COHEN, in his official capacity as Deputy  
Commissioner of Intelligence for the City of New York,

Defendants.

No. 13-cv-03448-PKC-JMA

Hon. Judge Pamela Chen  
Hon. Judge Joan Azrack

**PLAINTIFFS' SECOND SET OF SUPPLEMENTAL RESPONSES AND OBJECTIONS  
TO DEFENDANTS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS:**

**INTERROGATORY RESPONSES OF  
MASJID AT-TAQWA**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Masjid At-Taqwa ("Plaintiff") submits the following supplemental responses and objections to the interrogatories set forth in Defendants' First Set of Interrogatories and Requests for Production of Documents, dated December 6, 2013 ("Interrogatories").

**GENERAL RESPONSES AND OBJECTIONS**

1. These general objections apply to each of the Interrogatories. To the extent that certain of these general objections are cited in response to a particular Interrogatory, these specific citations are provided because they are believed to be particularly applicable to the Interrogatory and are not to be construed as a waiver of any other general objection applicable to

information or documents falling within the scope of the Interrogatory.

2. This response is based on Plaintiffs' knowledge of the facts and information presently available. Plaintiffs have not completed their discovery, investigation, and preparation for trial in this matter.

3. Plaintiffs object to the Interrogatories to the extent that they are overbroad, call for speculation, call for narrative answers, and/or seek information or documents that are not relevant to the subject matter of this action and are not reasonably calculated to lead to the discovery of admissible evidence. The shorthand "**Relevance**" is used to refer to this objection in response to particular Interrogatories.

4. Plaintiffs object to the Interrogatories to the extent that a complete response by Plaintiffs requires production of information in the possession of Defendants, information that Defendants are in a superior position to know or ascertain, or information that is publicly available. The shorthand "**NYPD Record,**" "**Public Record,**" or "**NYPD/Public Record**" is used to refer to this objection in response to particular Interrogatories.

5. Plaintiffs object to the Interrogatories to the extent that they are overly broad, unduly burdensome, and oppressive. Plaintiffs further object to the Interrogatories to the extent that the scope and the total number of Interrogatories, including multi-part Interrogatories, are also improper, unduly burdensome, oppressive, and overbroad. The shorthand "**Undue Burden**" is used to refer to this objection in response to particular Interrogatories.

6. Plaintiffs object to the Interrogatories to the extent that they seek information or documents protected from disclosure by the attorney-client privilege, the joint defense and/or common interest privilege, the work-product doctrine, or any other privilege, doctrine or immunity. The shorthand "**Privilege**" is used to refer to this objection in response to particular

Interrogatories.

7. Plaintiffs object to the Interrogatories to the extent that they seek information or documents that violate, implicate, or burden the First Amendment interests of Plaintiffs or Plaintiffs' members, congregants, worshippers, or donors, or others, including the associational privacy of the members and donors of organizational plaintiffs. The shorthand "**First Amendment**" is used to refer to this objection in response to particular Interrogatories.

8. Plaintiffs object to the Interrogatories to the extent that they seek information or documents that raise significant privacy concerns and/or concerns of perpetuating the very harms that Plaintiffs have sued to prevent. The shorthand "**Privacy**" is used to refer to this objection in response to particular Interrogatories.

9. Plaintiffs object to the Interrogatories to the extent they are posed without a time limitation, vague, ambiguous, and/or susceptible to numerous interpretations, and/or to the extent that they misconstrue language from the Complaint dated June 18, 2013. In such instances, Plaintiffs have adopted a reasonable time limitation and/or interpretation for the Interrogatory, and answered accordingly. The shorthand "**Vagueness**" is used to refer to this objection in response to particular Interrogatories.

10. Plaintiffs object to the Interrogatories to the extent that they purport to seek information or documents not within Plaintiffs' possession, custody or control. The shorthand "**Custody**" is used to refer to this objection in response to particular Interrogatories.

11. Plaintiffs object to the Interrogatories to the extent that they seek each and every fact supporting specific allegations. Plaintiffs' response is limited to material facts and is not a detailed or exhaustive listing of all evidence that could be offered at trial.

12. Plaintiffs object to the Interrogatories to the extent that they call for a legal

conclusion or questions of pure law separate and apart from the facts of this case.

13. Plaintiffs object to the Interrogatories as overbroad and unduly burdensome in that they are not limited in time and thus exceed the relevant timeframe of the acts giving rise to the claims and defenses alleged in this matter. The Interrogatories call for information that is neither relevant to the prosecution or defense of any claim asserted in this action nor reasonably calculated to lead to the discovery of admissible evidence.

14. Plaintiffs object to the Interrogatories to the extent that they purport to impose upon Plaintiffs obligations inconsistent with or in addition to those set forth in the Federal Rules of Civil Procedure or in the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York. Plaintiffs object to the Defendants' instructions and definitions to the extent they impose broader definitions or rules of constructions than are set forth in Local Rule 26.3. Plaintiffs further object to the Defendants' Interrogatories to the extent that the Interrogatories and all discrete subparts exceed the numerical limitation on Interrogatories imposed by Federal Rule of Civil Procedure 33.

15. This response is made without prejudice to Plaintiffs' expressly reserved right to supplement, modify, or amend these responses and objections as appropriate.

### **RESPONSES AND OBJECTIONS**

#### **To Masjid At-Taqwa Only:**

26. Identify all persons who own, manage, operate or work at the Zam Zam Shop or Taqwa Bookstore.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, First Amendment, Vagueness, and Privacy. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiff further objects to this Interrogatory because it is burdensome and harassing and seeks information unrelated to this lawsuit.



27. Identify the congregants of Masjid At-Taqwa who were “intimated” [sic] or who suffered anxiety purportedly from the NYPD surveillance camera, as alleged in ¶¶ 116-117 of the complaint.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, First Amendment, Vagueness, and Privacy. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff responds as follows with respect to its leadership:

Imam Siraj Wahhaj  
*Contact through Plaintiffs’ counsel*

Ali Abdul Karim  
*Contact through Plaintiffs’ counsel*

Sheikh Osman A. Adam  
*Contact through Plaintiffs’ counsel*

James Williams  
*Contact through Plaintiffs’ counsel*

28. Identify all congregants who spoke with mosque leaders concerning feelings of intimidation, anxiety, or concern, or who “started staying away from the mosque” by reason of the NYPD surveillance camera, as alleged in ¶ 117 of the complaint.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, First Amendment, Vagueness, and Privacy. Plaintiff further objects on the basis of unreasonable cumulateness or duplicativeness to the extent that this Interrogatory seeks information identical to that sought by Interrogatory No. 27. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

29. Identify all mosque leadership who spoke with congregants about the allegations in ¶ 117 of the complaint.

**Response:** Plaintiff objects on the basis of Undue Burden and Vagueness. Plaintiff further objects on the basis of Vagueness to the undefined term, “mosque leadership.” Subject to

and without waiving or limiting any objections, Plaintiff responds as follows on information and belief:

Ali Abdul Karim

Imam Siraj Wahhaj

Sheikh Osman A. Adam

30. Identify all entities and persons who do (or who have) provided security services for Masjid At-Taqwa.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Vagueness, First Amendment, and Privacy. Plaintiff further objects on the basis of Vagueness to the undefined term “security services.” Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff responds that the following individuals provide security services for Masjid At-Taqwa:

Ali Abdul Karim

James Williams

Volunteer Masjid At-Taqwa congregants

31. Identify the security personnel upon whom background checks were conducted.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Vagueness, First Amendment, Custody, and Privacy. Plaintiff further objects on Vagueness to the undefined terms “security personnel” and “background checks.” Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

32. Identify all persons involved in taking precautionary measures to protect Masjid At-Taqwa, as alleged in ¶ 123 of the complaint.

**Response:** Plaintiff objects on the basis of Undue Burden, First Amendment, Privacy, and Vagueness. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff responds that the following members of the mosque leadership have participated in precautionary measures taken to protect Masjid At-Taqwa, as alleged in ¶ 123 of the complaint and further specified in ¶¶ 124-26:

Imam Siraj Wahhaj

Sheikh Osman A. Adam

Ali Abdul Karim

Ben Dixon

*Contact through Plaintiffs' counsel*

James Williams

33. Identify all third party witnesses to religious counseling conversations, as alleged in ¶ 126 of the complaint.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, First Amendment, Privacy, and Vagueness. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff responds as follows on information and belief:

Ali Abdul Karim

James Williams

A Masjid At-Taqwa congregant

34. Identify all congregants who expressed discomfort with the presence of third party witnesses to their counseling conversations, or who have been prevented from receiving complete religious guidance, as alleged in ¶ 126 of the complaint.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Privacy, First Amendment, and Vagueness. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

35. Identify all persons who informed Masjid At-Taqwa about the presence of NYPD Informants at mosques prior to the time that such information became public, as alleged in ¶ 127 of the complaint.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Privacy, First Amendment, Vagueness, NYPD/Public Record, and Custody. Plaintiff further objects on the basis of Vagueness because ¶ 127 of the complaint does not allege that any person “informed Masjid At-Taqwa about the presence of NYPD Informants at mosques prior to the time that such information became public.” Plaintiff further objects on the basis of NYPD/Public Record and Custody because it is not in a position to know all individuals who were or are NYPD Informants and will not speculate as to who has been acting as NYPD Informants. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff responds as follows, upon information and belief:

Sheikh Osman A. Adam

Ali Abdul Karim

Imam Siraj Wahhaj

A Masjid At-Taqwa congregant

36. Identify all persons who Imam Adam spoke to concerning the plane crash referenced in ¶¶ 128 and 129 of the complaint.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Privacy, NYPD Record, and Vagueness. This Interrogatory is overly broad, irrelevant, harassing, and burdensome in that it seeks information on identities of individuals that Imam Adam spoke to

about an event widely reported in the press, without a time limitation. Subject to and without waiving or limiting any objections, Plaintiff responds as follows:

Imam Adam does not recall the specific names or identities of persons he spoke to concerning the plane crash on the phone calls referenced in ¶¶ 128 and 129 of the complaint.

37. Identify all persons who suspected that Rahman was an informant, including but not limited to the congregant who complained to Imam Adam that Rahman “was questioning people in the mosque about the September 11, 2001 attacks”, and the congregants who were being questioned, as alleged in ¶ 131 of the complaint.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Privacy, First Amendment, Custody, and Vagueness. Plaintiff further objects on the basis of Custody because it may not know the identities of “all persons who suspected that Rahman was an informant.” Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff responds that the following member of the mosque leadership “suspected that Rahman was an informant”:

Sheikh Osman A. Adam

38. Identify all persons referenced in ¶ 132 of the complaint, including but not limited to, all congregants who purportedly behave like informants; all congregants who complained to Imam Adam about the congregants who “behaved like informants;” and the persons who were told to leave the mosque by Imam Adam.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, First Amendment, Privacy, and Vagueness. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff responds, on information and belief, that the following persons

referenced in ¶ 132 of the complaint were confirmed to be informants:

Shamiur Rahman

*Last known address:* Unknown

*Last known place of employment:* New York City Police Department

Anas Last Name Unknown

*Last known address:* Unknown

*Last known place of employment:* Federal Bureau of Investigation

39. Identify all persons at Masjid At-Taqwa who participated in any decision to cease holding mosque social activities or other events, including but not limited to whitewater rafting, camping, and paintball trips, as alleged in ¶ 133 of the complaint, allegedly for “fear that they will heighten NYPD surveillance of the congregations”.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, First Amendment, Privacy, and Vagueness. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory. Subject to and without waiving or limiting any objections, Plaintiff responds, on information and belief, that the following individuals “participated in any decision to cease holding mosque social activities or other events” as alleged in ¶ 133 of the complaint:

Ali Abdul Karim

A Masjid At-Taqwa congregant

**To All Plaintiffs:**

49. Identify all persons who provided plaintiffs with documents or communications concerning surveillance or investigations by the NYPD of plaintiffs or other Muslims, and the nature of the information provided.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, Vagueness, Privacy, Privilege, and NYPD/Public Record. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiffs further object to this Interrogatory to the extent it seeks “the nature of the information provided,” as the request is vague and imposes an obligation on Plaintiff beyond what Local Rule 26.3 allows. Plaintiff further objects on the basis of Privilege to the extent Defendants seek information regarding documents or communications exchanged between Plaintiffs and Plaintiffs’ counsel, including attorneys and support staff from the American Civil Liberties Union (“ACLU”), New York Civil Liberties Union (“NYCLU”), and CLEAR project of CUNY School of Law (“CLEAR”), and to the extent Defendants seek documents or communications prepared by or for Plaintiff or Plaintiff’s counsel in anticipation of litigation or for trial in this case. Plaintiff further objects on the basis of NYPD/Public Record to the extent Defendants seek information regarding documents or communications that have been made publicly available in media reports. Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

50. Identify all purported NYPD Informants who communicated with plaintiffs, plaintiffs’ congregants, or plaintiffs’ members, donors or attendees concerning surveillance or investigations of plaintiffs by the NYPD.

**Response:** Plaintiff objects on the basis of Undue Burden, Vagueness, Custody, and NYPD/Public Record. Plaintiff further objects on the basis of NYPD/Public Record and Custody because it is not in a position to know all individuals who were or are NYPD Informants and will not speculate as to who has been acting as NYPD Informants. Plaintiff also objects on the basis of Custody because it is not in the position to know “all” NYPD Informants who communicated with plaintiffs’ “congregants,” “members,” “donors,” or “attendees” concerning surveillance or investigations of plaintiffs by the NYPD. Subject to and without waiving or limiting any objections, Plaintiff responds as follows:

Plaintiff Masjid At-Taqwa is not aware of any confirmed NYPD Informants who alerted Plaintiff, Plaintiff’s congregants, or Plaintiff’s members, donors, or attendees that the NYPD is conducting surveillance or investigations of Plaintiff.

51. Identify all founding members, leaders, Imams, assistant Imams, clergy, cleriq, heads of security, board members, and directors of plaintiffs Masjid Al-Ansar, Masjid At-Taqwa and Muslims Giving Back.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, Custody, and Vagueness. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiff further objects on the basis of Vagueness to the undefined term “leaders.” Plaintiff construes the word “founding” to modify the subsequent nouns and object to the Interrogatory because Masjid At-Taqwa was founded before the relevant time period for the lawsuit and the discovery requests.

52. Describe the current organizational structure of Muslims Giving Back, Masjid Al-Ansar and Masjid At-Taqwa, and identify the current leadership, head of security, board members, officers, and executives.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, First Amendment, Privacy, Custody, and Vagueness. Plaintiff further objects on the basis of Vagueness to the undefined term “leadership” and to the vague request for information about the “current



organizational structure.” Subject to and without waiving or limiting any objections, Plaintiff responds that the current leadership of Masjid At-Taqwa consists of the following individuals:

Imam Siraj Wahhaj

Sheikh Osman A. Adam, Assistant Imam

Bilal Hinson, Treasurer

*Contact through Plaintiffs’ Counsel*

Ben Dixon, Director of Administration

Ali Abdul Karim, Head of Security

James Williams, Assistant Head of Security

53. Identify all fundraising events and activities held or organized by plaintiffs and the amounts collected from each event.

**Response:** Plaintiff objects to this Interrogatory on the basis of Undue Burden, Relevance, Privacy, First Amendment, Custody, and Vagueness. Plaintiff further objects to this Interrogatory because it is multi-part. Plaintiff further objects on the basis of Vagueness to the undefined phrase, “fundraising events and activities.” Plaintiff reserves the right to supplement, modify, or amend those responses and objections as appropriate should Defendants re-serve the Interrogatory.

54. Identify all persons at Muslims Giving Back, Masjid Al-Ansar and Masjid At-Taqwa whose duties and responsibilities include the management or handling of its finances, including but not limited to, the maintenance of books and records; payment of expenses; or the collection of revenue or donations.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Privacy, First Amendment, Custody, and Vagueness. Plaintiff further objects on the basis of First Amendment and Privacy to the extent that the Interrogatory seeks disclosure of the identities of organizational members who participate in the collection of donations. Subject to and without waiving or

limiting any objections, Plaintiff responds as follows with respect to the leadership of Masjid At-Taqwa:

Bilal Hinson

Imam Siraj Wahhaj

55. Identify any and all employers of plaintiffs Raza, Dandia, and Elshinawy, both past and present, including the name, telephone number and address of each employer and the dates (month and year) of each employment.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, Custody, and Vagueness. Plaintiff refers Defendants to the objections and responses of the individual plaintiffs, who are the appropriate parties to respond to this Interrogatory. To the extent that the Interrogatory is directed to Plaintiff, Plaintiff further objects to the Interrogatory on the basis of unreasonable cumulateness and duplicativeness, and because it is multi-part.

56. Identify each occasion, if any, on which plaintiffs Raza, Dandia, and Elshinawy have been arrested, including the (i) date and location of the arrest, (ii) all charges for which the person was arrested, and (iii) the disposition of each charge (including expunged). This request includes all arrests in any jurisdiction.

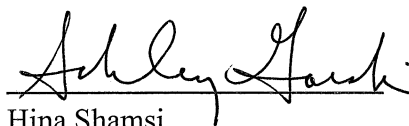
**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, NYPD/Public Record, and Vagueness. Plaintiff refers Defendants to the objections and responses of the individual plaintiffs, who are the appropriate parties to respond to this Interrogatory. To the extent that the Interrogatory is directed to Plaintiff, Plaintiff further objects to the Interrogatory on the basis of unreasonable cumulateness and duplicativeness, and because it is multi-part.

57. Identify any and all additional names, legal names, illegal names, aliases, former/prior names, birth names, business names, doing-business-as names, nicknames, if any, ever used by plaintiffs.

**Response:** Plaintiff objects on the basis of Undue Burden, Relevance, NYPD/Public Record, and Vagueness. Subject to and without waiving or limiting any objections, Plaintiff responds as follows with respect to Masjid At-Taqwa:

None.

Dated: July 7, 2014



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