

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN
DISTRICT OF TEXAS

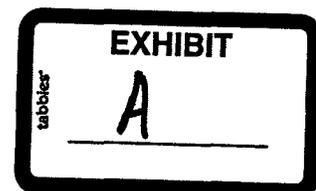
AUSTIN DIVISION

Riad Elsolh Hamad *
Plaintiff *
vs. * *A06CA 285SS*
Center for the Study of Popular *
Culture and David Horowitz *
Defendants. *
*

Plaintiff First Request for Admissions to Defendant David Horowitz

To Defendants David Horowitz, Center for the Study of Popular Culture and through their attorneys of record. Pursuant to Rule 36 of the Federal Rules of Civil Procedures you are hereby requested to answer the requests below to Plaintiff Riad Elsolh Hamad Hamad within the time prescribed in Rule 36 of the FRCP

- 1) Riad Elsolh Hamad is a Muslim.
- 2) Riad Elsolh Hamad is the Director of Palestine Children's Welfare Fund (PCWF).
- 3) Riad Elsolh Hamad manages an Islamic charity.
- 4) Riad Elsolh Hamad is a militant Muslim.
- 5) Riad Elsolh Hamad hates Jews.
- 6) Riad Elsolh Hamad made anti Semitic statements.
- 7) Riad Elsolh Hamad associates himself with Muslim fundamentalists.
- 8) Riad Elsolh Hamad is an Arab and a school teacher.
- 9) Riad Elsolh Hamad is a Semite
- 10) Riad Elsolh Hamad hates Israelis.
- 11) Riad Elsolh Hamad promotes violence.
- 12) Riad Elsolh Hamad is an American.
- 13) Riad Elsolh Hamad is engaged in criminal activities.
- 14) David Joe Kaufman researched the background of Riad Elsolh Hamad



- 15) Center for Study of Popular Culture (CSPC) warned the public about Riad Elsolh Hamad and his militant views.
- 16) CSPC aims financed Frontpagemag.org and still finances its operations.
- 17) David Horowitz was a Marxist political activist and was abused by his communist parents as a child.
- 18) David Horowitz never attended a church.
- 19) David Horowitz never did visit a mosque and did not read the Quran
- 20) David Horowitz is a devout Jews and observes the Sabbath
- 21) David Horowitz eats pork and violates Jewish traditions.
- 22) David Horowitz is a staunch supporter of Israel.
- 23) David Horowitz is not a Semite and pretends to be Jewish to gain sympathy for his views and make money.
- 24) David Horowitz is a very educated and experienced journalist
- 25) David Horowitz is aware of the laws and constitution of the United States.
- 26) David Horowitz is a very detailed and careful person.
- 27) David Horowitz is a very calculating person
- 28) David Horowitz does not engage in reckless activities and avoids pork.
- 29) David Horowitz is familiar with the educational system in the United States.
- 30) David Horowitz does not have any Arab friends and despises Arabs.
- 31) David Horowitz does not have any Muslim friends and believes that Islam is an evil religion.
- 32) David Horowitz and Joe Kaufman obtained the information about Riad Elsolh Hamad from the PCWF website.
- 33) PCWF website indicates that a Presbyterian church donated for the PCWF projects.
- 34) PCWF website indicates that Jewish Voices for Peace donated for the PCWF projects.
- 35) PCWF website indicates that books in Jerusalem are received by Rabbis for Human Rights.
- 36) PCWF website indicates that PCWF has Jewish, Muslim and Christian members.
- 37) Israel is not a Jewish state.
- 38) Israel does not have a constitution.
- 39) Israel has more than three million residents who are not Jewish.
- 40) Israel has a large population of Arab Jews.
- 41) Israel has no internationally recognized borders.
- 42) Only Jews are allowed to immigrate to Israel and receive nationality as a birth right.
- 43) An Israeli does not have to be a Jew.
- 44) A Jew does not have to be an Israeli.
- 45) Every Jew is a Zionist
- 46) Every Zionist is a Jew.
- 47) There are millions of Christian Zionists.
- 48) Israel receives money from Christian Zionists.
- 49) Christian Zionists believe that the Messiah will come and "save" the Jews.
- 50) There are more than a million Arabs who are citizens of Israel.
- 51) Jerusalem is the capital of the state of Israel.

52) **Arabs are not allowed into the Israeli army.**

Respectfully Submitted.

Riad Elsolh Hamad, pro se

4807 White Elm Drive
Austin, Texas 78749

Tel: (512) 7796115

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Defendants.

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**Plaintiff's First Request for Production of Documents to Defendant
David Horowitz**

To: Defendants David Horowitz, Center for the Study of Popular Culture and through their attorneys of record. Pursuant to Rule 34 the Federal Rules of Civil Procedures you are hereby requested to answer the requests below to Plaintiff Riad Elsolh Hamad within the time period prescribed in Rule 34 of the FRCP. Copies include electronic, audio, visual or digital images and files of any sort that complies with the requests below.

- 1) Copies of any and all insurance policies covering the activities of the Center for Study of Popular Culture (CSPC) its affiliates and David Horowitz.
- 2) Names, addresses, phone numbers of employees of the CSPC, its affiliates, David Horowitz and their educational background.
- 3) Religious affiliation of members of the board of CSPC, its affiliates and editors of Frontpagemag.org
- 4) Financial statement of CSPC, its affiliates and subsidiaries, copies of the phone bill of the offices of CSPC for the years 2003/2004/2005.
- 5) Financial statement showing the assets of David Horowitz and CSPC and their investments in the last five years.
- 6) Income tax statement of CSPC and its affiliates for the last three years.
- 7) Copies of any and all correspondences to and from the Israeli embassy in Washington, D.C or any diplomatic staff and CSPC, the Jerusalem Center for Public Affairs, its affiliates and David Horowitz regarding Riad Elsolh Hamad and his activities in the United States and Israel.
- 8) Copies of any and all investigations by CSPC and its affiliates and David Horowitz of Riad Elsolh Hamad and his activities in the United States and Israel.

- 9) Copies of any and all statements, press releases articles and analysis of Riad Elsolh Hamad by David Horowitz, CSPC and their affiliate Frontpagemag.org in the last three years.
- 10) Copies of any and all mail received by CSPC, its affiliates an David Horowitz regarding Riad Elsolh Hamad from its donors, readers or any third parties such as The Jerusalem Center for Public Affairs or any other Israel based organization or government agency.
- 11) Copies of the mission statement of CSPC, its affiliates and subsidiaries.
- 12) Copies of political, social, ethnic and religious organizations CSPC is affiliated with at the present time.
- 13) Copies of any and all electronic documents, images, files, data and sources owned saved by CSPC, its affiliates and David Horowitz regarding Riad Elsolh Hamad and the communications used to obtain such information.
- 14) Blood and urine sample of David Horowitz to a third party laboratory to identify his ethnicity and religious affiliations. Plaintiff will contact the attorney of record to arrange for the pick of the sample through the appropriate medical professionals. Please call or expect a call to arrange for the samples to be picked up.

Respectfully Submitted.

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Plaintiff's First Set of Interrogatories to Defendant David Horowitz

To: Defendants David Horowitz, Center for the Study of Popular Culture and through their attorneys of record. Pursuant to Rule 33 of the Federal Rules of Civil Procedures you are hereby requested to answer the requests below to Plaintiff Riad Elsolh Hamad within the time period prescribed in Rule 33 of the FRCP.

- 1) Identify Board of Directors of Palestine Children's Welfare Fund (PCWF), titles, duties and responsibilities, the Managing Director of PCWF, salary, duty and responsibilities and the source of your information.
- 2) Identify the location of PCWF offices, its staff, their titles, responsibilities and duties, the city, state where PCWF is based with source of your information.
- 3) Identify the assets of PCWF and the location of such assets according to your investigation for the article published on your website and the source of your information.
- 4) Identify the staff of PCWF, names, religion, location, titles and duties and the source of the information.
- 5) Identify the names, locations and affiliations of mosques or any religious institutions that Riad Elsolh Hamad attended in the last 35 years and the source of the information.
- 6) Identify schools where Riad Elsolh Hamad attended in the last 35 years and the source of your information.
- 7) Identify children, religion, affiliation of the children of Riad Elsolh Hamad and the source of your information.
- 8) Identify the names of government agents or agencies, private detectives, investigators or any third parties used to collect information about Riad Elsolh

Hamad and the names of terrorists, militants and violent individuals he met or supported and the amount of fees paid for their services to collect such information.

- 9) Identify Islamic charities that Riad Elsolh Hamad is affiliated with in the United States, Palestine and anywhere on planet earth and your source of information.
- 10) Identify the meaning of “ anti-Semitism” per your article regarding Riad Elsolh Hamad, source of “ anti-Semitic” statements by Riad Elsolh Hamad, date, time, place of such statements and the context of such statements with the date, time and venue of publication.
- 11) Members and board of directors of Center for the Study of Popular Culture (CSPC) with addresses, phone numbers, physical and email addresses., donors of CSPC, addresses, phone numbers and email addresses.
- 12) Identify the political affiliation of Riad Elsolh Hamad in the last 35 years and the source of such information and names of militant, violent or terrorist organizations he joined or supported and the source of your information.
- 13) Identify the names of children, men, women and any persons that Riad Hamad financed, condoned or supported to engage in violent actions any where in the United States and Palestine, militant, violent or racist groups Riad Elsolh Hamad is affiliated with and the source of such information in addition to the educational background of Riad Elsolh Hamad and the source of the information
- 14) Identify any and all private detectives, journalists, researchers who obtained information regarding the militant and political activities of Riad Elsolh Hamad and the source of the information
- 15) Name of the insurance company or companies, policy numbers, nature of policies and coverage of the Center for the Study of Popular Culture and David Horowitz’s residence and office space.
- 16) Identify the religion, ethnicity, race, age, gender, sexual preference, birthplace, nationality of Riad Elsolh Hamad and the source of your information.
- 17) Identify the religion, ethnicity and nationality of David Horowitz and the source of such information
- 18) Identify the educational background of David Horowitz, names of colleges and degrees earned with date, time and place.
- 19) Identify any and all political organizations, parties David Horowitz was affiliated with in the last 35 years including the United States Communist Party and any other groups he supported or joined.
- 20) Identify professional and technical positions held by David Horowitz and the scope of his professional experiences.
- 21) Identify any and all research, articles, books and seminars attended by David Horowitz about Arabs and Muslims and the dates of such publications.
- 22) Identify the position, education and experience of Joe Kaufman author of article on Riad Elsolh Hamad and the scope of his knowledge about Riad Elsolh Hamad and his background.
- 23) Identify sources used by Joe Kaufman to write his article about Riad Elsolh Hamad, dates of investigations, times of travel, sources for information and amount of money paid for such investigations.

- 24) Identify time, date and purpose of David Horowitz's visit's to any Arab or Muslim country in the last 35 years and names of individuals who accompanied you. .
- 25) Identify any and all staff of the Israeli embassy that David Horowitz and CSPC are associated with, amounts of money paid for their services by the Israeli embassy, individuals who are the liaison for communications with their titles and duties, any and all Israeli and United States government sources CSPC and David Horowitz used for their article about Riad Elsolh Hamad with dates of obtaining such information.

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