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February 3, 2010

HL Rogers, Esquire  
Sidley Austin, LLP  
1501 K. Street, N.W.  
Washington, D.C. 20005

Re: **Trita Parsi and NIAC v. Seid Hassan Daioleslam**  
Civil Action No.: 08-705 (JDB) (USDC-DC)

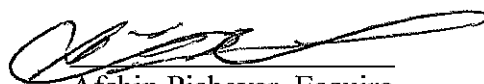
Dear Mr. Rogers:

Please be advised that this office has been retained to represent Mr. Garret A. Isacco as it relates to the above-referenced matter. Any and all future correspondence and/or communication in any form relating to Mr. Isacco should be directed to our attention.

Enclosed please find Garrett A. Isacco's Response to Defendant Seid Hassan Daioleslam's Subpoena *Duces Tecum*, including documents Bates-stamped: GI 0001, GI 0002, and GI 0003.

If you have any questions or concerns, please contact myself or Adrian V. Nelson, II, Esquire, who is now *Of Counsel* with my office.

Respectfully submitted,



Afshin Pishevar, Esquire  
600 East Jefferson Street  
Suite 316  
Rockville, MD 20852  
(301) 279-8773  
Attorney for Mr. Isacco

Enclosures (as stated)  
cc: Mr. Garrett A. Isacco  
Mr. Trita Parsi

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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TRITA PARSI and NATIONAL  
IRANIAN AMERICAN COUNCIL,

Plaintiffs,

v.

SEID HASSAN DAIIOLESLAM

Defendant.

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Civil Action No. 08-705 (JDB)

**GARRETT A. ISACCO'S OBJECTIONS AND RESPONSE**  
**TO SUBPOENA *DUCES TECUM***  
**FROM DEFENDANT SEID HASSAN DAIIOLESLAM**

COMES NOW Garrett A. Isacco, by counsel, and provides his Objections and Response to the Subpoena *Duces Tecum* served on him by Defendant Seid Hassan Daiopleslam, and states as follows:

**General Objections**

1. Garrett A. Isacco ("Mr. Isacco") Mr. Isacco objects to Defendant's Definitions to the extent they alter the plain meaning of any term or impose obligations that are inconsistent with or in addition to those imposed by the Federal Rules of Civil Procedure.
2. Mr. Isacco further objects to Defendant's request for documents to the extent they seek information protected by the work-product privilege and/or the attorney investigative privilege. Specifically, Mr. Isacco objects to Defendant's request for documents to the extent they call for information that was prepared in anticipation of litigation or on the advice of

counsel or was prepared by Mr. Isacco pursuant to an investigation conducted in anticipation of litigation.

3. Mr. Isacco further objects to Defendant's request for documents to the extent they require documents that contain confidential information, the disclosure of which might cause Mr. Isacco injury or would involve confidential business information or an invasion of the privacy rights of Mr. Isacco or third parties.

4. Mr. Isacco further objects to Defendant's request for documents to the extent that they are unduly burdensome, vexatious, overbroad and harassing.

5. Mr. Isacco objects to these document requests on the grounds that they are overly broad, meaning that they are not reasonably tailored to elicit information relevant to this lawsuit, or reasonably calculated to lead to the discovery of admissible evidence.

6. Mr. Isacco objects to these document requests to the extent that they seek documents that are no longer in its possession, custody or control, or are equally available to Defendant.

7. Mr. Isacco will not produce any documents already supplied in the pleadings and motions in this litigation, as well as documents that Defendant himself wrote or that are otherwise already in Defendant's custody and control.

8. Mr. Isacco will not produce documents that contain confidential, proprietary information.

9. In making these objections, Mr. Isacco does not concede the relevancy or materiality of the documents or the subject matter to which any documents refers. These objections are made by Mr. Isacco subject to, and without in any way waiving or intending to waive: (a) all questions as to competency, relevancy, materiality, privilege and admissibility of

evidence for any purpose in any subsequent proceeding in, or the trial of, this action or any actions; (b) the right to object to other discovery procedures involving or related to the subject matter of the discovery requests responded to; and (c) the right at any time to revise, correct, or clarify any of the responses set forth, or the documents referred to, consistent with Federal Rules of Civil Procedure and Local Rules.

10. Mr. Isacco's investigation of the facts and information that relate to the claims at issue are ongoing and Mr. Isacco's Response is based upon information now known to Mr. Isacco. Mr. Isacco reserves the right to modify and/or supplement this Response as the existence of additional documents becomes known.

#### **Specific Objections**

11. More specifically, Mr. Isacco objects to Defendant's request for documents relating to Plaintiff NIAC's 2008 Amended Tax Return to the extent the Request seeks information that is protected under the attorney-client and/or attorney work-product privilege, and/or would be inadmissible as after acquired evidence under the Federal Rules of Evidence.

#### **Response**

12. Without waiving the foregoing general or specific objections, and notwithstanding the fact that Mr. Isacco has no responsive documents, Mr. Isacco is producing three (3) e-mail communications from Phillip Isacco, Kevin Cowl, and Trita Parsi relating to Plaintiff NIAC's 2008 Amended Tax Return, which are Bates-stamped: GI 0001, GI 0002, and GI 0003.

Pishevar & Associates, P.C.

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Rockville, Maryland 20852  
Tel 301-279-8773  
Fax 301-279-7347  
[ap@pishevarlegal.com](mailto:ap@pishevarlegal.com)

Attorney for Garrett A. Isacco

**From:** Trita Parsi [mailto:[tparsi@niacouncil.org](mailto:tparsi@niacouncil.org)]  
**Sent:** Monday, November 09, 2009 6:30 PM  
**To:** Kevin C. Cowl; 'Philip Isacco'  
**Subject:** Re: Tax Return Amendment

Just a few points:

1. We did send mailing to our own members
2. It was LESS than 10% than our time

Thnx

Sincerely,  
Trita Parsi, PhD  
President

National Iranian American Council  
1411 K ST Ste 600  
Washington DC 20005

Tel: 202 386 6325  
Fax: 202 386 6409  
Email: [tparsi@niacouncil.org](mailto:tparsi@niacouncil.org)  
web: [www.niacouncil.org](http://www.niacouncil.org)

**From:** "Kevin Cowl" <kcowl@niacouncil.org>

**Date:** Mon, 9 Nov 2009 17:07:38 -0500

**To:** 'Philip Isacco' <pisacco79@yahoo.com>

**Cc:** <tparsi@niacouncil.org>

**Subject:** RE: Tax Return Amendment

See below. Trita, please correct if necessary.

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**During the year, did NIAC attempt to influence foreign, national, state or local legislation, including any attempt to influence public opinion on a legislative matter or referendum, through the use of:**

**1. Volunteers? – (yes)**

2. **Paid Staff or Management? – (yes)**
3. **Media Advertisements? -- (no)**
4. **Mailings to members (no), legislators (yes), or the public (no)?**
5. **Publications, or published or broadcast statements? (yes)**
6. **Grants to other organizations for lobbying purposes? (no)**
7. **Direct contact with legislators, their staffs, government officials, or a legislative body? (yes)**
8. **Rallies, demonstrations, seminars, conventions, speeches, lectures, or any other means? (no)**
9. **Other activities? (describe) (none)**

**What expenses were incurred associated with any of the above lobbying activities.**

**10% of Patrick Disney's time, 10% of Emily Blount's time, 10% of Trita Parsi's time (calculate using their 2008 salaries)**

**Please provide a description of lobbying activities.**

**Meetings with members of Congress, op-eds in newspapers, setting up meetings for members in districts.**

**From:** Philip Isacco [mailto:[pisacco79@yahoo.com](mailto:pisacco79@yahoo.com)]  
**Sent:** Friday, November 06, 2009 1:08 PM  
**To:** Kevin Cowl  
**Subject:** Tax Return Amendment

Hi Kevin,

We need the following information in order to properly amend the tax return:

**During the year, did NIAC attempt to influence foreign, national, state or local legislation, including any attempt to influence public opinion on a legislative matter or referendum, through the use of:**

1. a  
9  
Volunteers?
2. Paid Staff or Management?
3. Media Advertisements?
4. Mailings to members, legislators, or the public?
5. Publications, or published or broadcast statements?
6. Grants to other organizations for lobbying purposes?
7. Direct contact with legislators, their staffs, government officials, or a legislative body?
8. Rallies, demonstrations, seminars, conventions, speeches, lectures, or any other means?
9. Other activities? (describe)

**What expenses were incurred associated with any of the above lobbying activities.**

**Please provide a description of lobbying activities.**

Once we have this information, we can prepare the amended return.

Take care,

Phil Isacco



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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TRITA PARSI and NATIONAL  
IRANIAN AMERICAN COUNCIL,

Plaintiffs,

v.

SEID HASSAN DAIIOLESLAM

Defendant.

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Civil Action No. 08-705 (JDB)

**CERTIFICATE REGARDING DISCOVERY**

I HEREBY CERTIFY that on February 3, 2010, I served via first class U.S. mail, postage prepaid, Garrett A. Isacco's Response to Defendant's Subpoena *Duces Tecum* to: HL Rogers, Esquire, counsel for Defendant, Sidley Austin, LLP, 1501 K. Street, N.W., Washington, D.C. 20005.

I will retain the original of these documents in my possession without alteration, until the case is concluded in this Court, the time for noting an appeal has expired and any appeal noted has expired.

Respectfully submitted,

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Afshin Pishevar, Esquire  
600 East Jefferson Street  
Suite 316  
Rockville, MD 20852  
(301)-279-8773  
Attorney for Mr. Isacco

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FOR THE DISTRICT OF COLUMBIA

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TRITA PARSI and NATIONAL  
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v.

SEID HASSAN DAIIOLESLAM

Defendant.

Civil Action No. 08-705 (JDB)

**CERTIFICATE OF SERVICE**

***I HEREBY CERTIFY*** pursuant to United States District Court for the District of Columbia Rules that on this 3<sup>rd</sup> day of February, 2010 I mailed and e-mailed a copy of Garrett A. Isacco's OBJECTIONS AND RESPONSE TO SUBPOENA first class, postage prepaid to:

HL Rogers, Esquire,  
Counsel for Defendant  
Sidley Austin, LLP  
1501 K. Street, N.W.  
Washington, D.C. 20005.

Respectfully Submitted,  
*PISHEVAR & ASSOCIATES, P.C.*

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Counsel for Plaintiff