



**TESTIMONY  
OF  
RESPONDENT No. 5**

**MUSAWER MANSOOR IJAZ**

**BEFORE THE HONOURABLE COMMISSION CONSTITUTED BY THE  
HONOURABLE SUPREME COURT OF PAKISTAN VIDE ORDER  
DATED DECEMBER 30, 2011 PASSED IN CONSTITUTION PETITIONS  
NOS. 77 TO 85 & 89 OF 2011 & CMA NO. 5505/2011 IN  
CONSTITUTIONAL PETITION NO.79 OF 2011**

**IN THE MATTER OF INQUIRY IN TO THE  
QUESTIONED MEMORANDUM**

**WITNESS STATEMENT UNDER OATH  
OF  
MUSAWER MANSOOR IJAZ**

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**DELIVERED AT  
PAKISTAN HIGH COMMISSION  
LONDON, ENGLAND**

**22 FEBRUARY 2012**

## **OPENING STATEMENT UNDER OATH**

I, Musawer Mansoor Ijaz (*Ijaz*), a citizen of the United States of America, do hereby solemnly swear that the testimony I present in this Witness Statement on oath to the Honourable Commission (*the Commission*) is the truth as I know it to have occurred based on the evidence in my possession and to the best of my recollection where physical or documentary evidence is not available in reference to the subject matter of this inquiry (*the Inquiry*). I submit my testimony as a first person witness to the events herein.

I appear in front of this Commission to present the physical evidence in my possession and to allow such evidence as I have to be forensically tested in any manner chosen by competent, independent and unbiased experts retained by the Commission so that the authenticity of these data can be ascertained with certainty.

I duly submit this Witness Statement to the Commission as a private citizen of the United States, born in the State of Florida in the year 1961, and bound only by the laws of the United States of America. I state for the record that my loyalties are first and foremost to the national interests of my country of birth. I do not now nor have I ever served in any official position in the US government. I act at the behest of no person in government, outside of government, in any foreign country or in the United States of America.

### **CONTACT WITH PAKISTAN OFFICIALS**

While I maintain high-level political and military/intelligence contacts in nearly two dozen countries around the world, during the past decade, I have had no contact with any Pakistani government official – civilian, judicial, military or intelligence—with the following four exceptions (Amb. Haqqani excluded):

- (a) 2003 when I last interacted with the former director general of Inter-Services Intelligence, Gen. Ehsan ul-Haq, shortly before he left the DG-ISI position in 2004; and,
- (b) Nov. 2005 when my wife and I visited the prime minister of Pakistan and some military officers during and after our trip to Kashmir as the earthquake reconstruction period began; and,
- (c) May 5, 2009 when I met with President Asif Ali Zardari for 45-50 minutes at the Willard Intercontinental Hotel in Washington DC at the invitation of Amb. Haqqani (*Haqqani*) to brief the president shortly before he met with US officials at the White House; and,

(d) Oct. 22, 2011 when I met alone with Lt. Gen. Ahmed Shuja Pasha, the current DG-ISI, at his request for approximately four hours in London to provide him with the same accounting of facts I provide to the Commission herein.

### **CONTACT WITH HAQQANI**

Over the past decade, I have maintained regular contact with Haqqani through e-mail, BlackBerry chat exchanges, SMS, in-person meetings and telephonic discussions. Often, after the 9-11 attacks, when I was not available for media appearances due to calendar conflicts, I would refer producers to Haqqani as a qualified expert on Pakistan affairs. Haqqani was helpful and supportive in other important matters, including speaking at one of my charity's annual fundraising dinners in June 2009 (please see Exhibit-A for examples of our communications). From the day Haqqani assumed his ambassadorship role, I had no involvement in his Congressional or White House lobbying efforts, no role in his development of the Pakistani-American community or any other aspect of his role as ambassador other than assisting in the ways we were able to after the 2005 Kashmir earthquake. At no time during Haqqani's ambassadorial tenure have I lobbied anyone for Pakistan, acted as an agent of the Pakistani government or represented any foreign interest lobbying for a particular outcome. I acted in this matter purely as a friend in my private capacity trying to assist Haqqani in communicating his message in ways that only he dictated, characterized and gave authority for, not in any way to be construed as diplomatic or official activity.

Other than as disclosed above, I maintain no active relationships of any type – electronic, e-mail contact, telephonic contact, BlackBerry messenger contact or SMS contact – with anyone living in Pakistan. I have no close relatives living or alive in Pakistan. I have no business interests in Pakistan. I have no political interests in Pakistan. I have never been involved in any political party, political organization or given a single political contribution in Pakistan to any candidate for high office, or sitting elected official. In short, I have no material ties to Pakistan other than my birth parents.

### **EVENTS OF MAY 9, 2011 UNTIL MAY 12, 2011**

The events I describe herein are a factual recantation of my interactions with Haqqani on the dates of May 9th, May 10th, May 11th and May 12th of 2011, and then again starting on October 10, 2011, the date on which an opinion piece I authored was published in the Financial Times entitled "Time to take on Pakistan's jihadist spies." The text of this opinion article has already been entered into the record on the date of the Court's Order. I had further material interactions with Haqqani on October 28, 2011 and November 1, 2011. At no time did I meet Haqqani in person. All communications were electronic / telephonic.

The events of the three and a half days in May will be summarized in Tabular form in order to show the type of communication (telephone, e-mail, BlackBerry chat, PIN message and handwritten notes), a brief description of each type of communication, and where a communication was evidenced by physical documentation or electronic messages those are attached hereto as labeled exhibits. My recollections of the discussions in telephone calls are placed in quotations where attributed to Haqqani. Where the dialogue uses coded words or phraseology that may not be apparently clear to the Court, I have put annotations to explain what was intended by the language used.

### **RESERVATION NOTICE**

I reserve the right to amend this Witness Statement at a future date once forensic examination of my electronic BlackBerry device is complete. There are certain messages (PIN, SMS, etc) that may be archived in backup volumes that I am presently unaware of, having not seen any of those messages since June 2011 when the last monthly backup was made. I have chosen not to retrieve these messages from my computer hard drives which normally roll off after a thirty (30) day period in the device until a certificate that my BlackBerry device has not been tampered with and contains original data in it can be provided. The backup data will only be reviewed once the forensic examination is complete. I would also ask the Commission's permission to spend about 20-30 minutes in explaining how BlackBerry handsets work and why the knowledge of BB operations are so critical to the analysis of data in this matter. Finally, certain Explanation comments that I have noted are for "In Camera" hearings only because the disclosures are not appropriate for this statement that can be viewed by others.

Please note in the tabular formats set forth below, line numbered for convenience, the following legend:

BBM = BlackBerry Messenger chat exchange

SMS = Short Message exchange

E-M = E-MAIL sent or received

CALL = Telephone OUT to recipient or received IN (numbers withheld for "In Camera" briefing)

TBA = To Be Announced (for those messages referenced but held on backup hard drives)

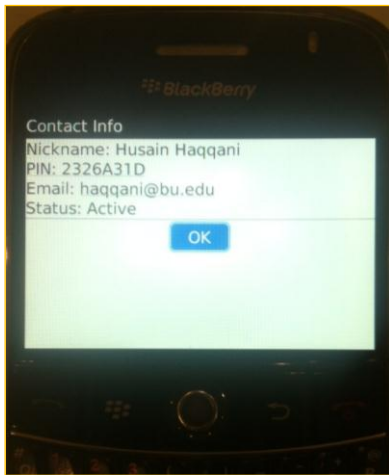
All dates are shown in MONTH/DAY/YEAR format.

All times given are Central European Time (CET) in military time format.

### **HAQQANI BLACKBERRY PIN NUMBERS**

I submit for the Commission's records the two PIN numbers that are unique in the BlackBerry system of communications that were used by Haqqani during our communications by BBM Messenger. The first one, 2326A31D, was used in May. The second, 287EF1E9, was used in

the October and November exchanges up until at least November 5<sup>th</sup> or 6<sup>th</sup> when I noticed he had disabled me as a BBM contact. I wish to additionally inform the Commission that in the intervening weeks since Haqqani once again changed his BlackBerry PIN, I have been informed by two important official sources (whom I shall identify “In Camera”) that attempts may have been or are being made to manipulate, erase, delete or otherwise distort data in the electronic devices of Haqqani that could confirm the data I have provided herein as fact. Additionally, it may be noted by the Commission that both the Interior Minister of Pakistan as well as Haqqani



have confirmed that some form of electronic messaging and comms took place with me. Yet Haqqani continues to deny the entirety of any exchanges, for example, as those set forth in this Statement. So which is it? Did he communicate with me or not? If so, where is that data and who has access to it today?

**TABLE 1  
COMMUNICATIONS LOG FROM MAY 9 – MAY 12, 2011**

#	TYPE	DATE	TIME	INITIATOR	CONTENT	EXPLANATION
001	BBM	05-09-2011	12:31	Haqqani to Ijaz:	Are you in London? I am here just for 36 hours. Can we meet for after dinner coffee or s'thing?	Initial communication sent by Haqqani on May 9 <sup>th</sup>
002	BBM	05-09-2011	12:32	Ijaz to Haqqani:	I'm in Monaco but it's no problem for me to fly up. Takes 90 minutes. What time did you have in mind? Where do you want to meet?	
003	BBM	05-09-2011	12:35	Haqqani to Ijaz:	Pls call me. I'm at the Park Lane Intercon +442071060900 room 430	
004	BBM	05-09-2011	12:35	Haqqani to Ijaz:	Waiting for ur call now	
005	CALL	05-09-2011	12:35:49	OUT Ijaz to Haqqani	Call lasting 16:03 in which Haqqani requested Ijaz assistance to deliver <b>verbal</b> message to “the Americans”, stating his preference that the recipient be Adm Mike Mullen	Details under <b>CALL #1</b> below Notes taken by hand attached as <b>EXHIBIT-B</b> Memo content originated entirely from him
006	CALL	05-09-2011	12:58:06	OUT Ijaz to Gen Jones	Call lasting 02:25 to Gen James L. Jones at his home number at approx 7am local EST -- his wife received this initial call	Details under <b>CALL #2</b> below
007	CALL	05-09-2011	13:01:27	OUT Ijaz to Lawyer 1-(MJ)	Call lasting 04:47 to first Ijaz legal counsel in Washington DC to determine second and third options to reach Adm Mullen	Details under <b>CALL #3</b> below
008	CALL	05-09-2011	13:16:02	OUT Ijaz to Lawyer 2-(OC)	Call lasting 00:17 to second Ijaz legal counsel in Washington DC also to determine alternative routes to reach Mullen. Left voicemail message	

009	BBM	05-09-2011	13:37	Ijaz to Haqqani:	Could access to the 3 stooges who widow the man be arranged as part of the bigger picture?	During call with Legal Counsel 1 the question arose from my counsel whether interrogation of the three wives (3 stooges) of bin Laden (the man) could be granted as part of quid pro quo
010	BBM	05-09-2011	13:39	Haqqani to Ijaz:	I am sure that can be arranged upon formal demand	
011	BBM	05-09-2011	13:40	Ijaz to Haqqani:	That is critical to breaking apart the system outside -- and understanding what was going on inside. Would we get candor and truth or some brainwashed jargon?	"...breaking apart the system outside" is reference to gaining enough data in interrogation that US counterterrorism forces could unravel other key parts of the Al Qaeda network outside Pakistan
012	BBM	05-09-2011	13:40	Ijaz to Haqqani:	The calls to Isphani's people have been made. Very very receptive reaction so far	"Isphani's people" is reference made under a code word we agreed in <u>CALL #1</u> . If I was writing about the US officials I approached, it would be under his wife's name so if anyone intercepted or saw the message, there would be no direct reference to the US. Later, as I finally decided on Jones as the US interlocutor, Isphani referred only to him
013	BBM	05-09-2011	13:44	Haqqani to Ijaz:	If my friend and I feel sufficiently empowered in relation to the bad boys, I will ensure we get candor	"friend" referred to President Asif Ali Zardari. In our code, his reference to "friend" or "boss" meant President Zardari. "bad boys" was reference to COAS Gen. Ashfaq Kayani and DG-ISI Gen. Ahmed Shuja Pasha, and generally the Army and ISI
014	BBM	05-09-2011	13:45	Ijaz to Haqqani:	Got it. Let me see if we can't get you a sledge hammer with a golden handle	"sledge hammer" was my reference to the US government making the intervention requested by Haqqani. "golden handle" was reference to Adm Mullen being the specific intervention channel, with his call to Gen Kayani being the "golden" part of the handle
015	BBM	05-09-2011	13:47	Haqqani to Ijaz:	Would be nice	
016	BBM	05-09-2011	13:47	Ijaz to Haqqani:	I'm sending you a PIN message that others cannot see. Please respond. Thanks	PIN messages are BBM handset to BBM handset that can only be seen by the two users. These are highlighted in RED FONT in a user's screen when it appears
017	BBM	05-09-2011	13:48	Haqqani to Ijaz:	Okay. Thx	
018	BBM	05-09-2011	13:54	Ijaz to Haqqani:	Message by PIN sent	This is one of the PIN messages I hope to recover from backup data once my device has been forensically examined.
TB A	PIN	05-09-2011	TBA	Ijaz to Haqqani:	I do not recall at the time of this writing what was contained in the PIN message, although I believe it is related to Lawyer 1's request to determine under whose authority the verbal message would be sent.	TBA
019	CALL	05-09-2011	13:54:31	IN Gen Jones to Ijaz	Call lasting 19:26 in which Jones and Ijaz discussed content and action plan for Haqqani request.	Details under <u>CALL #4</u> below
020	BBM	05-09-2011	13:56	Haqqani to Ijaz:	Okay	This message was received while I had just received the phone call from Gen. Jones. In BBM devices, it is possible to receive BBM messages while in conversation on the phone handset

021	CALL	05-09-2011	14:14:40	IN Lawyer 2 to Ijaz	Call lasting 07:22 in which I explained need for my counsel to get in touch with third of three parties I was planning to approach Adm Mullen through	
022	BBM	05-09-2011	14:22	Ijaz to Haqqani:	Message has been delivered to Isphani. Reception positive but I need you to agree to do something. Can I call you?	This message refers to my conversation just completed with Gen Jones (please see Call #4 details). When I say "I need you to agree to do something", that is reference to Gen Jones' demand that no verbal message would be conveyed, as Haqqani originally had requested of me
023		05-09-2011	14:55	Ijaz	MS-WORD DOCUMENT CREATED	This document would eventually be drafted into the written final version of the memorandum
024	BBM	05-09-2011	15:02	Ijaz to Haqqani:	Please PING when you can talk and on what number. Time sensitive	I had questions about how he wanted certain things drafted in the now agreed upon written memorandum that I was about to start drafting. "Time sensitive" referred to the need to get this done in time to be able to deliver the memorandum into US hands, as requested by Haqqani, during the day of the 9 <sup>th</sup> , max morning 10 <sup>th</sup>
025	BBM	05-09-2011	15:05	Haqqani to Ijaz:	Entering No 10. Can speak on cell after an hour	A point of authenticity here: there is no way I could have known what Haqqani's schedule was on that day to know when he was or was not with whom in London
026	BBM	05-09-2011	15:05	Ijaz to Haqqani:	Okay. I'll wait for your PING	
027	BBM	05-09-2011	16:09	Haqqani to Ijaz:	<b>PING!!!</b>	
028	BBM	05-09-2011	16:09	Haqqani to Ijaz:	<b>PING!!!</b>	
029	BBM	05-09-2011	16:09	Haqqani to Ijaz:	Pls call on cell now +16179532835	
030	BBM	05-09-2011	16:10	Haqqani to Ijaz:	<b>PING!!!</b>	
031	BBM	05-09-2011	16:19	Ijaz to Haqqani:	Sorry. Was stuck on call to DC. Pls ping again when ready	
032	WORK	05-09-2011	16:30-17:50	Ijaz	Ijaz normal business day activities, as evidenced by phone call log records	
033	CALL	05-09-2011	17:51:41	OUT Ijaz to Haqqani	Call (left voicemail) lasting 00:23 requesting the return call so we could clear a few points up before I started drafting the memorandum	
034		05-09-2011	17:55-18:25	Ijaz	Went ahead with drafting initial draft of seven-point memorandum for review and discussion with Haqqani based on earlier handwritten and type-written notes in Call #1	
035	BBM	05-09-2011	18:26	Haqqani to Ijaz	<b>PING!!!</b>	
036	BBM	05-09-2011	18:27	Ijaz to Haqqani:	Tried you. Phone says unavailable	
037	CALL	05-09-2011	18:28:45	IN Haqqani to Ijaz	Call lasting 02:34 in which I told Haqqani that initial draft was ready for his review based on points he gave me earlier. Cleared up drafting points from handwritten and typed notes in Call #1. Discussed authority and delivery modality	Details under <b>CALL #5</b> below
038		05-09-2011	18:32:47	Ijaz to Haqqani:	E-Mail with initial draft of Memorandum, sent from a private non-descript e-mail address controlled by Ijaz to Haqqani's private Boston University e-mail address	Details under <b>EXHIBIT-C</b>
039	CALL	05-09-2011	18:36:41	OUT Ijaz to Gen Jones	Call lasting 00:48 in which I relayed Haqqani's clarifications, that he would insure the requisite authority was behind	

					the memo once finalized and that he had agreed to let it go out in writing as opposed to verbal transmission. I further informed Jim that the memo's first draft had just been sent out to Haqqani for review and editing	
040	BBM	05-09-2011	18:38	Ijaz to Haqqani:	The message I sent is what MM will see. It will be given directly to him and no one else	Informing Haqqani that the e-mail first draft of the memorandum has been sent. "MM" refers to Mike Mullen
041	BBM	05-09-2011	18:59	Ijaz to Haqqani:	My friend in DC simply said too many people have been burned in the past two years on the US side and he wanted to insure that on such a sensitive subject, the data and proposal are clear. This is you to me, me to him. He trusts me enough to know I won't bring it forward unless it has top level approval. He does not need it with any email addresses etc. He will scrub that in any event. If you want names to be mentioned, yours, JK, MD, etc, I will do that in person. So get whatever message you want delivered back to me and I'll insure it gets in MM's hands. Best. M	Reference to information from my earlier conversation with Gen Jones in which Jim made it clear to me he would only transmit any message if it was in writing and had the approval of the highest political level in Pakistan. The names Haqqani had mentioned to me in Call #1 as people that would be involved in forming the new national security team included Jehangir Karamat (JK) and Mahmud Ali Durrani (MD), both former Pakistan envoys to US, whom Haqqani told me were on board with a transitioned civilian gov't
042	BBM	05-09-2011	19:02	Ijaz to Haqqani:	By the way, the interesting thing is that they consider AZ's approval of the message worth more than anyone else in country right now. How do you like that?	
043	CALL	05-09-2011	19:42:50	OUT Ijaz to Lawyer 2	Call lasting 05:58 in which we discussed the response of the third candidate to assist in delivering the message to Adm Mullen. During this call, we decided jointly against using the third candidate, as he was an active serving US government official and was reticent to get involved without informing certain sectors of the US government in advance.	The name of the second and third US persons who were considered as potential channels for transmission of the memorandum will only be disclosed in "IN CAMERA" briefings and have been sanitized from any documents attached hereto as these individuals did not enter into the events under consideration by the Commission
044	BBM	05-09-2011	20:43	Ijaz to Haqqani:	I have additional information you need to hear. Ping when I can call you please	
045	BBM	05-09-2011	21:10	Ijaz to Haqqani:	Would it be safe to say that you don't want to run this up your flagpole because you need to work this deal from the middle out? Tell me if that's the case and I'll use a different approach that does not require something in writing. What would then be helpful is if I could simply have a BBM saying my talking points are correct, or not, and then you set your table, I'll set my table and make sure you are an honored guest at my table when the party begins. If you're good with that, I just need your okay on the talking points. No need to run it up the az-pole, if you get my drift. M	TO BE EXPLAINED "IN CAMERA" ONLY
046	CALL	05-09-2011	21:20:11	OUT Ijaz to Haqqani	Left voicemail at his London hotel in call lasting 00:31 asking him to get back to me on whether he received my e-mail message containing the first draft of the memorandum and when I could expect his comments.	

047	CALL	05-09-2011	23:49:10	IN Lawyer 1 to Ijaz	Call lasting 05:28 in which the lawyer told me that he had approached the 2 <sup>nd</sup> choice for transmission of the memo, that the person wanted to have a conference call and what the basic outline of his conditions was to proceed with my request of him.	Details under <b>CALL #6</b> below The 2 <sup>nd</sup> choice was a senior American political figure, well-known and well-regarded, who insisted on having the memorandum emanate from Pres. Zardari directly under signature in order to proceed
048	CALL	05-09-2011	23:55:21	CONF CALL Lawyer 1 2nd US person's rep Ijaz	Call lasting 09:58 in which the aide of the 2 <sup>nd</sup> choice for transmission was briefed on the details of the operation, including what would be said in the memo and what was required from Adm Mullen in return.	After this conf. call, even though we did not have the final answer from either person, the second and third choices were deemed indeterminable in terms of ability to move in time. I left the door open with their reps and lawyers, but decided to proceed with final delivery of the memorandum to Gen Jones for onward delivery to Adm Mullen.
049	BBM	05-10-2011	00:29	Haqqani to Ijaz:	Msg recvd. Tweaking. Middle of road option sounds good. Will call morning.	TO BE EXPLAINED "IN CAMERA" ONLY
050	BBM	05-10-2011	00:29	Haqqani to Ijaz:	<b>PING!!!</b>	
051	CALL	05-10-2011	00:30:55	IN Haqqani to Ijaz	Call lasting 01:17 in which I informed Haqqani that two of the three options for transmission were out, why they were out and that in order to proceed with the third option I needed him to confirm the memo's draft form or send me his changes, and I needed his confirmation that he had the highest political authority to proceed. He said he would review the memo during the night. On authority, he said something like "don't worry about that, I've got it sorted out with the boss."	Details under <b>CALL #7</b> below
052	CALL	05-10-2011	00:33:05	OUT Ijaz to Gen Jones	Call lasting 01:39 in which I informed Gen Jones that he was the chosen channel to transmit the message, that I had confirmation from Haqqani of his authority to proceed from the highest political level and that I would be sending the memorandum over shortly with a request that he hold on to it until I had Haqqani's final word in the morning (Tue, 10 May).	Details under <b>CALL #8</b> below
053	BBM	05-10-2011	00:37	Ijaz to Haqqani:	Will you be sending me your tweaks or am I to use my copy as final? If tweaks are short, I can call you to get them	
054		05-10-2011	01:28:33	Ijaz to Gen Jones:	E-mailed agreed upon Memorandum draft, pending the "tweaks" from Haqqani planned overnight, and sent it from my mailbox to Gen Jones' private e-mail address with cover note indicating that the document had the approval of the President of Pakistan, as Haqqani had informed me in <b>CALL #7</b> .	Details under <b>EXHIBIT-D</b>
055	CALL	05-10-2011	01:29:18	OUT Ijaz to Lawyer 2	Call lasting 09:34 in which I informed my in-house counsel of the steps I had just taken, that Jones was the finally chosen interlocutor to deliver the memorandum to Mullen and that I had just sent the draft version to Jones. I asked him to verify that we had no problems with US government laws or with foreign laws in relevant	

					jurisdictions where we run our business frameworks. Lawyer 2 signed off.	
056		05-10-2011	02:04:11	Ijaz to Gen Jones:	E-mailed Gen Jones a second copy from GMAIL	
057		05-10-2011	08:45:43	Ijaz to Haqqani:	Forwarded E-mail to Haqqani that was sent to Gen Jones at 01:28:33, sanitizing it for names because up until this moment, Haqqani did not know which of the three unnamed officials I had chosen to insure delivery to Adm Mullen in a manner that he would trust the source sufficiently to evaluate the memo on its merits. I informed Haqqani that he had a window of about four hours in which to call the entire operation off, after which the memo would have been delivered without recourse.	Details under <b>EXHIBIT-E</b> PARTS OF E-MAIL COVER NOTE TO HAQQANI TO BE EXPLAINED "IN CAMERA" ONLY
058		05-10-2011	08:46:06	Ijaz to Haqqani:	E-mailed Haqqani a second copy from GMAIL	
059	BBM	05-10-2011	08:47	Ijaz to Haqqani:	You have mail from two of my mailboxes. Please read, respond and then we have one last short discussion before I put everything in motion. Thanks. M	
060	CALL	05-10-2011	09:06:16	OUT Ijaz to Haqqani	Call (to Intercontinental Hotel, Room 430) lasting 11:16 in which I asked Haqqani if he had any last minute changes to the Memorandum, and then informed him it was sitting on the US interlocutor's desk ready to be given to Mullen later that day. I then asked him one last time if he indeed had the authority from the highest political level to proceed with the operation because the US side would not proceed without that understanding and he said, "I've got the boss's approval; go ahead". I told him we would need to wait until just after lunchtime for me to reach the US side and give the final delivery instruction. We discussed briefly his schedule for return to the US and next contact time.	Details under <b>CALL #9</b> below
061	BBM	05-10-2011	12:45	Ijaz to Haqqani:	I was just informed by senior US intel that GD-SII Mr P asked for, and received permission, from senior Arab leaders a few days ago to sack Z. For what its worth	TO BE EXPLAINED "IN CAMERA" ONLY
062	BBM	05-10-2011	13:08	Haqqani to Ijaz:	Thanks. Very useful	Another msg appeared at 13:09 by PIN that was deleted (may still be on backup drive)
063	BBM	05-10-2011	13:29	Ijaz to Haqqani:	Would you support the following? We try the memo out on MM the way we have planned. If there is no result, we (I) float it out in op-ed form and say here is what the government civilians were willing to do but the army hard heads are not willing. I would only do it with your consent, and probably only when you tell me you are no longer going to be active service. I think American policymakers need to know what was possible if AK is not willing to go for a middle track solution. Your thoughts?	TO BE EXPLAINED "IN CAMERA" ONLY

064	BBM	05-10-2011	13:38	Ijaz to Haqqani:	If they're going to wreck democracy, we might as well expose them in the fullest way possible and put them in a glass cage	
065		05-10-2011	14:04:47	Gen Jones to Ijaz:	Return Receipt confirmed Jones received Memo	Details under <b><u>EXHIBIT-F</u></b>
066	CALL	05-10-2011	14:51:33	OUT Ijaz to Gen Jones:	Call lasting 02:55 to Gen Jones to make sure he understood both the cover note as well as the Memorandum, and to get an idea of what time he was planning to deliver it to Adm Mullen. During this call, Gen Jones made it clear to me that it was hard for him to believe anyone in Pakistan could deliver on the agenda presented in the Memo. He commented it was a "compelling" set of ideas but appeared almost as if composed by an opposing party. I reminded him it was coming from Amb Haqqani with the appropriate political authority	
067	BBM	05-10-2011	14:57	Ijaz to Haqqani:	Message delivered with caveat that he has to decide how hard to push -- we only set the table. He must decide if he wants one course meal or seven course meal. Ball is in play now -- make sure you have protected your flanks	Confirmed Memorandum delivered to Gen Jones and that it was now up to Adm Mullen to decide how hard to push on Gen Kayani. The phrase "one course meal" referred to a light admonition by Mullen about any interference in civilian affairs. "seven course meal" was reference to Mullen's willingness to issue an outright warning to Kayani to stand down on any possibility of coup risk Haqqani referred to. "Ball is in play now" meant the Memo was imminently going to be in Mullen's hands. "make sure you have protected your flanks" was direct reference to Haqqani's need to make sure those who needed to know he was masterminding this operation knew before any information leaked out.
068		05-10-2011	20:06:57	Gen Jones to Ijaz:	Confirms delivery of Memorandum to Mullen	Details under <b><u>EXHIBIT-G</u></b>
069	BBM	05-11-2011	12:33	Ijaz to Haqqani:	I've been asked to find out what time your meeting is today. Response so far indicates they are having a hard look, although they find it nearly impossible to believe anyone could deliver such results... to be expected, I suppose. Hope you got home okay. Did you see Mush while in London?	Much has been made in media reports about the credibility of the Memorandum's content but it should be noted and clear in the record that Gen Jones was the first person to convey skepticism about the Memo, to which I simply replied it was not our problem and that we had simply agreed to act as messengers to insure whatever the civilian government wanted Adm Mullen to know should be passed on without our interference or inputs. Gen Jones then did just that. Mush was a reference to Gen Musharraf
070	BBM	05-11-2011	14:59	Ijaz to Haqqani:	<b>PING!!!</b>	
071	BBM	05-12-2011	00:35	Ijaz to Haqqani:	I now have the details of the alleged transcript and all that mess. You need to stop whatever you are doing and call me	TO BE EXPLAINED "IN CAMERA" ONLY

					now or as soon as possible. Unbelievable what the army boys are trying to do to the civilian side	
072	BBM	05-12-2011	00:36	Haqqani to Ijaz:	Call me on my cell	
073	BBM	05-12-2011	00:37	Haqqani to Ijaz:	Also, M in ur msgs above referred to the Admiral, right?	
074	BBM	05-12-2011	00:37	Ijaz to Haqqani:	Yes	
075	CALL	05-12-2011	00:39	Ijaz US to Haqqani:	No answer	
076	CALL	05-12-2011	00:40	Ijaz US to Haqqani:	No answer	
077	CALL	05-12-2011	00:41:31	Ijaz UK to Haqqani:	Call lasting 00:34 (left voicemail)	
078	CALL	05-12-2011	00:42	Ijaz US to Haqqani:	No answer	
079	BBM	05-12-2011	00:54	Ijaz to Haqqani:	Clarification. M at the end of a message is Mansoor. M or MM in the text of a message is the admiral. Apologies for any confusion. BBM when free. I'll call you. Whether it is shattering news or not is up to you to decide	
080	CALL	05-12-2011	01:09	Ijaz US to Haqqani:	Call lasting 04:00 in which Haqqani informed me about the results of the meeting with Mullen, that as he put it "a call will go out from Washington to Pindi [Rawalpindi?] soon" and that he was satisfied that the intervention had worked. We clarified the M remark in my BBMs, he thanked me and the call ended.	Details under <b><u>CALL #10</u></b> below
081		05-12-2011	01:24:37	Ijaz to Gen Jones:	Relayed the Haqqani call broad outline in an e-mail labeled "Feedback"	Details under <b><u>EXHIBIT-H</u></b>
082		05-12-2011	01:44:32	Gen Jones to Ijaz:	Jones responded by informing that Mike Mullen had received the message at 1400hrs on Tue, 10 May and that Mullen had called Jones shortly after receiving the Memo.	Details under <b><u>EXHIBIT-I</u></b>
083	BBM	05-12-2011	01:47	Ijaz to Haqqani:	I just received an email from my link to MM independently confirming what you told me by phone. He says MM was appreciative of our intervention and utilized the data to advise and consent	
084	BBM	05-12-2011	02:47	Haqqani to Ijaz:	Thanx. On way to Isloo. Will touch base on return	
085	BBM	05-12-2011	02:54	Ijaz to Haqqani:	Good luck. Let me know at any time if you need any help	

## **TELEPHONE CALL SUMMARIES**

### **CALL #1 – 05/09/2011 IJAZ TO HAQQANI – 12:35:49 – DURATION 16:03**

I called Haqqani at the London Intercontinental Hotel, Room 430 as he had requested a few minutes earlier by BlackBerry messenger. We had not spoken by telephone for some time, so we briefly exchanged pleasantries. I asked him what he was doing in London – he simply said it was a private visit and moved on to the subject matter at hand. There was an elevated stress in his voice. He spoke rapidly, almost randomly at times. Several times I had to ask him during the call to slow down so I could get the notes down from what he was trying to tell me.

He explained that the bin Laden raid had created severe stresses between the army/intelligence organs of Pakistan and the civilian branch of government. Referencing some meeting that had taken place “72 hours ago” between the army chief, the prime minister and the president, he said there was a “collective jute-chalaky” [my spelling phonetically because I do not know what these words mean as my Urdu is quite rudimentary] between the army and ISI to pin the blame of the bin Laden failure on President Zardari’s administration. He said the US and British were “beating the shit out of us” to get information in the raid’s aftermath about how bin Laden had been on Pakistani soil for so long. He said in clear words that I wrote on my notepad as he said them, “the Army wants to bring the government down”.

He then said he needed my help – I asked in which sense – and he informed me that it was urgent to get a message – verbally – to “the Americans” that the Obama administration needed to back the army down. He said this was a “1971 moment” – a reference I did not understand at all at the time he first made it and had to ask him at the end of the call to clarify for me because he repeatedly referred to this phrase during the call. He then immediately stated his preference for the right person to give this as yet undefined verbal message to was Adm. Mike Mullen, then chairman of the US joints chiefs of staff because (a) he was one of the few people who Gen. Kayani would listen to and (b) he was about to chair a meeting with a Pakistani delegation a two days later in Washington (Wednesday, May 11, 2011).

I informed him that I did not know Adm. Mullen. I asked him why he needed me to do this for him when he had so many other ways to do it and he said in his official position, it was impossible to get such a message to the Americans without risking the possibility of detection by ISI or the military officers he had around him at the embassy in DC. He said I was “plausibly deniable” as a conduit and that no one would ever believe – if this got public in those days – he had come to me for such kind of help. I made it clear that I had long ago given up the role of a back-channel communicator and that I would do it for him as a friend only if I could get someone on the US side to agree to deliver a message to Adm Mullen in the timeframe Haqqani had requested.

I then asked him whose authority he was acting on behalf of. He was vague. Not evasive, just vague. He said there was a like-minded group of people in Islamabad that would be brought on board by “the boss” – a reference I understood to mean President Asif Ali Zardari – as the new national security team once tensions had dissipated. He mentioned two names I recognized (Jehangir Karamat and Mahmud Durrani) but added that they would be approached once this was all over – a point I took to mean they were unaware of this operation in advance.

I then asked him what the message was that he wanted delivered and by when exactly it had to be in Mullen’s hands. He dictated a series of points to me, many of which are contained on the two pages of handwritten notes, and the rest were typed into a blank e-mail template at the point I asked him to pause because I couldn’t keep handwritten pace with his verbal speed while holding the phone to my ear at the same time. The balance of notes, typewritten into the blank e-mail template, ultimately became the basis of the first draft of the written memorandum that I sent him at 18:32 on May 9, 2011.

The handwritten notes are explained further under EXHIBIT B explanations.

We concluded the 16-minute phone call by agreeing to use certain coded words in our BBM chat exchanges during the following two days until the effort was concluded. These are enumerated as each chat took place in the “Explanation” column of Table 1.

**CALL #2 – 05/09/2011 IJAZ TO GEN. JONES – 12:58:06 – DURATION 02:25**

I called Gen. Jones at home. His wife picked up and said he was jogging. I explained the importance. As I rarely called at home that early in the morning, she understood it was important and said she would get in touch with him while he was running and get him to call me back in about an hour when he was in. I gave her a brief overview – that the matter had to do with a rapidly devolving situation on the ground in Pakistan and that I had been asked to get an urgent message into a senior administration official. I did not go into details. I did not give names.

**CALL #3 – 05/09/2011 IJAZ TO LAWYER #1 – 13:01:27 – DURATION 04:47**

As a parallel track, I immediately called my outside counsel, whose name I am withholding pending an “In Camera” hearing on this matter, in Washington DC – he is a former senior government official from the administration of Pres. George H W Bush working at one of Washington’s most prominent and largest law firms. I called him because I knew he had a wide array of contacts available for us to explore how else we might approach Adm. Mullen if I was unable to persuade Gen. Jones to pass the message on. I explained the situation at hand in outline form only. I explained under attorney-client privilege that Haqqani had asked me to

assist him, that the tone of my earlier discussion with Haqqani indicated to me that something serious was amiss in Islamabad and that if we could help we should. His principal concern was under whose authority such a sensitive message was being delivered. I explained that Haqqani generally enjoyed the complete confidence of the president in Pakistan, and that I understood the impetus for this operation was coming from Pres. Zardari in the broader sense, if not operationally. He told me there were two options available to us through the law firm, one a senior US political figure now in private life and the other an acting officer of the US government who knew Adm. Mullen well. He told me he would get in touch with both and report back to me later in the day (it was 7am in Washington at the time I reached him).

**CALL #4 – 05/09/2011 GEN. JONES TO IJAZ – 13:54:31 – DURATION 19:26**

Gen. Jones called me back from his private cell number around 8am his time in Virginia. I recapped the entire Haqqani call (please see summary of Call #1 for details). His first reaction was to say he didn't particularly trust Pakistani officials (generally, not specifically), and that in his experience through government work with them, they often made verbal promises that they didn't keep. He said he would not consider taking any message to Adm. Mullen if it wasn't in writing.

Gen. Jones also insisted on having higher political authority than Haqqani, whom he had grown to be somewhat skeptical of over time, if and when he decided to go ahead. We went through the points Haqqani wanted relayed, which took the bulk of the time on the call. He commented that while compelling, it sounded like an opposition group's agenda – I made clear that it was more like a change of players under a sitting head of state whose new ground rules and agenda were so diametrically different than the old that it (Haqqani's desired message) could give off that impression.

I gave Jones some background on my relationship with Haqqani and told him that Haqqani would never have come to me if it wasn't serious because of my past tensions with the senior leaders of Pakistan, no matter whether military, intelligence, political or any party persuasion. Jones's skepticism remained throughout the call, but in the final analysis he said he would do it as a favor for me if I could get the message to him in writing with the appropriate political authority. We agreed to be in touch later in the day once I had gotten Haqqani on board with the NO VERBAL, ONLY WRITTEN demand and I had further explained to Haqqani that Jones wanted certain knowledge of the appropriate political authority and consent for this operation before delivering the message to Adm. Mullen.

**CALL #5 – 05/09/2011 HAQQANI TO IJAZ – 18:28:45 – DURATION 02:34**

During this call, I informed Haqqani that one of the three choices on the US side was insisting on having the message in writing, with higher political authority than Haqqani alone, to go forward. I informed him that I had taken the precautionary step, given the tight time constraints, to prepare a written draft based on the notes I took in the first call – and that I had tried to reach him earlier in the day to let him know about the in-writing constraint. He agreed and told me to send him the draft in writing for his review.

I then asked him to clarify what he meant by “discipline” in the nuclear program – a point he had made in the written notes earlier – and whether the point he made about US Vice President Biden on the “blank sheet” agreement on nukes and Kashmir should be included in the preamble paragraphs. He said no. I also asked him whether he wanted names included in the paragraph mentioning the new national security team – he said no. Finally, I asked him whether he wanted any characterization of the army chief, prime minister, president’s meeting included – this is when he gave me the information about the CIA station chief’s name being outed and the phraseology about “no central control being in place” as a result of the stresses in Islamabad during the previous days.

After inserting a few of the necessary comments into the e-mail draft, I sent the draft to Haqqani at 18:32. We closed the call by noting my mail to him would come in a few minutes as well as the message’s delivery timing and logistics.

**CALL #6 – 05/09/2011 LAWYER #1 TO IJAZ – 23:49:10 & 23:55:21 – DURATION 05:28 & 09:58**

During these two calls – the first with my outside general counsel, the second a conf call with a third party, we explored the requirements posed by two other possible candidates to deliver the message to Adm. Mullen. My counsel informed me that he had reached a close aide of the active US government officer who knew Adm. Mullen well, and that he wanted to have a conference call with me to listen to how we wanted to do this and what the US official wanted from us as performance parameters before agreeing to our request. We then agreed that the US political personality was out due to slow response.

We followed up this call with a 10-minute conference call with the US official’s trusted friend. We discussed two possibilities – the first was to have the US official arrange a private meeting between myself and Adm. Mullen so I could deliver a verbal message as Haqqani had initially preferred. This approach had two problems – I was a nine hour airplane ride away from Washington and there simply wasn’t enough time to match Adm. Mullen’s busy schedule with my getting in the air before the Wed. meeting was to have taken place. The second problem was

my personal hesitation to carry a verbal message given what Gen. Jones had told me in his first call about the unreliability of Pakistani officials saying one thing and doing another.

The second possibility discussed was for us to have the US official deliver the message, in writing, to Adm. Mullen. This posed two different challenges – the US official was unwilling to do it as a “non-paper” (a message delivered in writing on paper without signature or letterhead between governments). He insisted on the message being on letterhead with appropriate signature.

This conference call made it clear that the 2<sup>nd</sup> potential US interlocutor was simply not the right solution.

**CALL #7 – 05/10/2011 HAQQANI TO IJAZ – 00:30:55 – DURATION 01:17**

I informed Haqqani that two of the three options for transmission were out, why they were out and that in order to proceed with the third option I needed him to confirm the memo’s draft form or send me his changes, and I needed his confirmation that he had the Pakistani government’s highest political authority to proceed. He said he would review the memo during the night. On authority, he said something like “don’t worry about that, I’ve got it sorted out with the boss.”

Haqqani also quickly informed me at the end of the conversation that I needed to remove Point 6 on the list because it was already agreed by the Pakistani authorities in the intervening hours since we had last spoken.

**CALL #8 – 05/10/2011 IJAZ TO GEN. JONES – 00:33:05 – DURATION 01:39**

I called Gen. Jones immediately to say that he would transmit the message, that I had confirmation from Haqqani of his authority to proceed from the highest political level and that I would be sending the memorandum over shortly with a request that he hold on to it until I had Haqqani’s final word in the morning (Tue, 10 May). I told Gen. Jones that given the fluidity of events on the ground, it was best that he waited until at least midday on Tuesday before putting the Memo in Adm. Mullen’s hands. I recall asking him whether he preferred WORD.DOC files or .PDF files for printing purposes – and I sent him both types of files later in the night so that if there were last minute changes and I was not in front of a computer, he could make the necessary changes himself with me giving him Haqqani’s changes by telephone.

**CALL #9 – 05/10/2011 IJAZ TO HAQQANI – 09:06:16 – DURATION 11:16**

During this call on the morning of May 10<sup>th</sup>, I asked Haqqani if he had any last minute changes to the Memorandum, and then informed him that I had sent it to the US interlocutor earlier in the

night so that if there were no changes, we were ready to deliver to Mullen later that day, before Haqqani had planned to leave London.

We went through the architecture of the Memo, focusing this time on the opening paragraph and confirming the new signature paragraph (from whom did this document come) that had been added in. We reviewed briefly the six agenda points.

I then asked him one last time to confirm he had the authority from the highest political level to proceed with the operation because Gen. Jones (who remained anonymous to Haqqani) would not proceed without that understanding from me and he said, “I’ve got the boss’s approval; go ahead”. I told him we would need to wait until just after lunchtime for me to reach the US interlocutor and give the final delivery instruction.

We discussed briefly his schedule for return to the US and next contact time, and when I would be given the time of the Wednesday meeting with Mullen.

**CALL #10 – 05/12/2011 IJAZ TO HAQQANI – 01:09 ON MMI US CELL – DURATION 04:00**

Haqqani informed me about the results of the meeting with Mullen. He said a “call will go out from Washington to Pindi [Rawalpindi?] tonight.” and that he was satisfied the intervention had worked. We clarified the M remark in my BBMs, he thanked me and the call ended.

**RATIONALE FOR WRITING THE *Financial Times* ARTICLE**

Much confusion has been introduced by media analysts, critics and supporters alike about the motivations and agendas that may have led me to publish the initial FT article on October 10, 2011. I state for the record that there was no external impetus given to me to write the initial article, neither from any individual, nor from any governmental body – US or foreign – nor any other source in any manner whatsoever. Since 1996, when I published my first article in The Wall Street Journal, I have published over 125 opinion pieces in only the most reputable journals and newspapers around the world, and have appeared extensively on television and radio as an analyst regarding political, security and business issues. I have also had numerous articles written about my citizen diplomacy initiatives in Sudan, Kashmir, Pakistan and elsewhere.

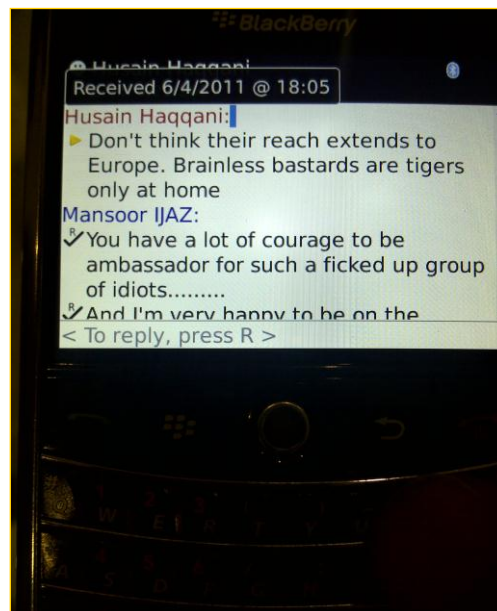
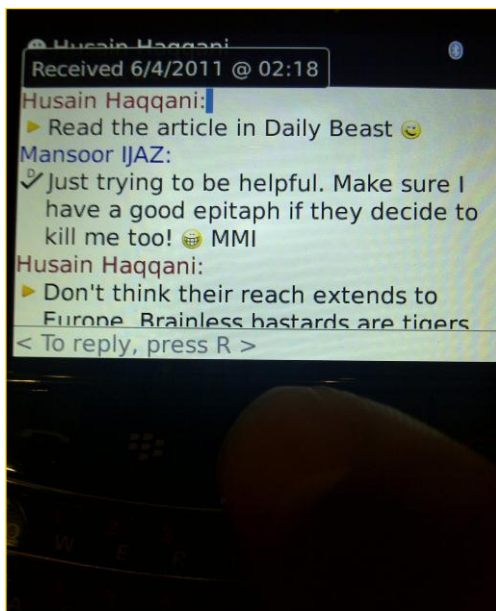
In recent years, I have reduced my writings dramatically, writing only a few times a year when a major political or geopolitical event takes place that bears consequence on subject matters that interest me. Pakistan generally, and more specifically the struggle to bring a secure and stable democracy to the fore without hidden agendas, corrupt practices and the venality that is so often present in modern day Pakistani rulers – military and civilian alike – is a major topic on which I have written often in the past. If the Commission so wishes, I am happy to provide a full reference list for my past writings on Pakistan.

I further state for the record that my sole motivation in writing the Oct. 10<sup>th</sup> FT article was to enunciate a policy prescription I believed was in the best national security interests of the United States about how best to deal with Directorate S of Pakistan's Inter-Services Intelligence. The impetus for the article, which I drafted the first thoughts for on 24 September 2011, arose from testimony offered by Adm. Mullen in his final appearance before the Senate Armed Services Committee in which he called the Haqqani network of terrorists a "veritable arm" of the ISI, among other very strong comments.

The reaction in Pakistan's media to Adm. Mullen's statement was immediate, and as it has been in my case under the glare of the Mullen Memorandum controversy, was shrill and unabashed in lambasting a high-ranking military officer of the United States who served our country honorably for 43 years. While Adm. Mullen needed no defense from my writings, I felt it was important for US policymakers to know that an effort which involved Adm. Mullen himself back in May had been made to reign in Directorate S of ISI, and it so happened that to source this material for my opinion piece, I referenced the memorandum as the "peg" – as it is called in journalism – to base my opinions on.

There was no malicious intent involved in bringing the memorandum into the opening paragraph. The description I gave was the bare minimum of facts that were needed in order to give my opinion piece the authenticity it required for the policy prescription to be given any weight. I had written more or less exactly the same opinion article on June 2, 2011 for Newsweek / Daily Beast Company <http://www.thedailybeast.com/blogs-and-stories/2011-06-02/pakistans-isi-spy-agency-s-wing-and-terrorism/> after learning of the death of Saleem Shahzad, without material effect in the inquiry of my arguments. Clearly, introducing the memorandum into the FT opinion article strengthened the argument because it gave it the needed authenticity. Editors at the FT who normally evaluate my opinion columns for publication have tended in the past to choose those articles of mine that begin with some historical anecdote to anchor the article's policy prescriptions and opinions. This article was no different, other than the anecdote was in the form of a "first person" analysis. If the Commission so requests, I will make available my internal correspondence with the FT editors to provide evidence of this fact.

I would like to note, for the Commission's interest, that Haqqani sent me the following BBM chat on June 4, 2011 to which I responded and he then wrote a reply – please see the following screen shots:



I apologize to the Commission for the frank exchange of language between Haqqani and myself, but this is evidence of the type of relationship we shared together. Message time-stamped 02:18 was first message from Haqqani. I replied the next day. Message in second screen time-stamped 18:05 was his reply.

One final point of note on this subject matter: some sections of the media have questioned why it took so long for the opinion piece to be published in the FT from the date of Adm. Mullen's statement. As you are most certainly aware, FT is a financial newspaper whose editorial pages are reserved primarily for finance discussions, not matters of security and foreign policy. As Europe has been engulfed in perhaps the most important financial crisis it has suffered since the introduction of the Euro, the Eurozone crisis dominated the editorial pages of the FT for those weeks, and my opinion article which dealt with matters much further away and unrelated to the major editorial thrust, simply was placed on a date that was convenient to the FT's editorial calendar. I had no control over that decision – and again, at the Commission's request, I am prepared to make my internal communications with the editors available in this specific regard.

### **EVENTS OF NOTE AFTER THE *Financial Times* ARTICLE APPEARS**

Haqqani sent me a BlackBerry message around 21:50 GMT on the evening of October 10, 2011, shortly after my opinion article had been published on the FT's website. It read: "This FT op-ed of yours is a disaster". Before I had a chance to see it and respond, he telephoned me at 21:57 GMT in a somewhat panicked voice, reiterating what he had just said by BBM message and then asking me whether there were any other "senior Pakistani diplomats" I knew in Islamabad that he could name to throw the "press hounds of my scent". I responded by querying why the op-ed was such an issue for him and what he was so upset about. He replied simply by saying everyone would now assume it was he who was the brainchild of the Memorandum and that I understood nothing about Pakistan's domestic situation. It was a short call lasting only 00:45.

At the time of this writing, I do not yet have the hard copy details of my October telephone bills to give the exact time and date of the second call I received from Haqqani – it was about 5 or 6 days before I met with Gen. Shuja Pasha in London. My recollection of that call is as follows:

Haqqani called to inform me he had just learned that Gen. Pasha was coming to London. I expressed disinterest and lack of knowledge. He expressed some anxiety over my disinterest and said something to the effect of “what’s going on here” – a clear reference to his skepticism of my disinterest.

He did not ask once during that call whether I had been approached to see Gen. Pasha. His only concern was whether Gen. Pasha would be meeting with the FT editors in London, whether I knew anything about it and whether I would do him the favor of intervening with the FT editors to insure they did not provide Gen. Pasha with a copy of the Memorandum or any other evidence that I had provided the editors when I wrote the opinion piece.

I responded by again asking him, as I had on the night of May 10, 2011, why he was so paranoid about the Memorandum and whether we had done something wrong in delivering it to Adm. Mullen. His response was to simply reiterate that I understood nothing about Pakistan’s domestic political situation and that there were some who would say Haqqani “was playing for your [U.S.A.] side” if the content of the Memorandum was revealed in public. I told him that I did not believe the FT editors would take a meeting with Gen. Pasha without a lot of advance work being done about purpose, etc and the call ended.

### **SUMMARY OVERVIEW OF MEETING WITH DG-ISI LT. GEN. SHUJA PASHA**

I was contacted by a person, whose real name I do not know to this day, on or about the 16<sup>th</sup> of October to see whether I would be willing to meet with Gen. Pasha. I inquired purpose and proposed location. Purpose: to determine the truthful facts surrounding the content of the Memorandum and its genesis (authorship, operational details of the effort to get it delivered to Adm. Mullen, etc). Location: London was the most convenient location for both of us to meet. After discussing the implications of such a meeting going ahead with my in-house legal counsel and my family, I agreed to take the meeting.

We met on the evening of 22<sup>nd</sup> October in London at the Park Lane Intercontinental Hotel, Room 210, from approximately 1830hrs until 2230hrs, according to my records. There was one person – I believe the logistics manager of the meeting – with Gen. Pasha when I was shown into the room by a member of his security detail and that person shook hands with me and left the room promptly.

I brought my electronic devices and a notepad to the meeting. We both agreed to take batteries out of our telephones while we spoke. The telephones were stored in a drawer near the table we sat at. Gen. Pasha brought a notepad as well. After being seated face to face at a small dining table, Gen. Pasha opened the meeting by stating his purpose in asking to meet me. He made clear he was not there to interrogate but rather to understand with evidence supporting my statements what exactly had happened in the days in question. He made clear he was in London with the consent of the army chief, Gen. Kayani.

He made clear he did not know who I was prior to the meeting, and had asked one of his researchers to prepare a dossier for his review. He asked me to give him my own summary of my background, partly to allow me to introduce myself, but also to separate fact from fiction in the dossier he held. Each comment I made was later backed up during the meeting by evidence I showed him on my computer about my background, life, family and businesses.

I made clear to him at the outset of the meeting that I had agreed to the meeting on the basis that it was entirely possible in my mind given the adverse reactions Haqqani had shown me on the two telephone calls I had with him prior to this meeting that Haqqani did not properly inform the government of Pakistan of his activities, and that if anything he had done was against the laws of Pakistan, in violation of the Constitution of Pakistan or the rules of international diplomacy as agreed between the US and Pakistan, it was possible that myself, Gen. Jones and Adm. Mullen had become unwitting accessories to these possible wrongdoings. For that reason alone, whether I liked or disliked the ISI, whether I had written against it or the military or any other organ of the Pakistani state, I felt the responsibility to share the facts with him and to understand whether there was any possible wrongdoing on our part collectively as US citizens that had assisted Haqqani in transmitting the message to Adm. Mullen.

I also made clear to Gen. Pasha that I did not want to personally be involved in any debriefing of him that would lead to a disruption of the civilian government's normal business – he responded by making clear that it was his and Gen. Kayani's deep desire to see a government complete its term, but that the rumors of what was contained in the Memorandum from a content perspective could simply not be ignored. On this basis, we agreed to start the meeting in good faith with him questioning openly without constraints and me answering in the most truthful and complete manner possible.

He asked me about my relationship with Haqqani (length, frequency of contact, type of contact, etc). He queried me about my interactions with prior Pakistani ambassadors in the United States, as well as past political leaders (Bhutto, Sharif, Musharraf, etc). After my initial set of answers – about 30 minutes into the meeting – he went to the door of the room and informed the security person that “this is going to take a while”.

We then began the data debriefing. We went through the information that has been provided in this Witness Statement line by line so that I could explain what had happened in those three and a half days. He asked questions, at times looked a bit astonished at what he was seeing but at no time did he offer any assessment of the data other than to indicate that the records were “clear and convincing” evidence. We took the bulk of the four hour meeting to do the data debrief.

In my recollection, Gen. Pasha read the Memorandum itself in about three or four minutes, demonstrated surprise and dismay – at times disgust and disappointment – over the content of the document. He did not ask a single question about the content of the document other than if I was willing to divulge the names of the others besides Haqqani that he had told me were to be part of the new national security team. I did so with the caveat that I did not believe either Karamat or Durrani knew anything about the plan to deliver the Memorandum, the contents of the Memorandum or the mindset of Haqqani and those behind him in dreaming up the scheme.

At the point during the meeting where he learned of the three US people I had approached to deliver the Memorandum to Adm. Mullen, he asked me how I knew each of them, how well and to briefly summarize my requests of them in terms of why, who was involved, under what authority and in which modality such delivery might take place with each person.

Intermittently during the data debrief, I would open my computer or my BlackBerry device and point out how the data was stored, transmitted, displayed, etc. He then carefully analyzed dates, times, “properties” of my Microsoft documents to see when the documents were created and how they fit into the timeline I was stating, looked at the original telephone bill logs, checked the time at which each BBM message was sent or received and reviewed my handwritten notes.

Contrary to media reports, at no time did Gen. Pasha try to send a BBM message to Haqqani from my handset. He recorded the PIN numbers that I had for Haqqani, both the old one and the new one – Haqqani did not yet have the third PIN at that time that he would ultimately obtain. Gen. Pasha did ask to see how I stored e-mail addresses and to see the ones I had for Haqqani – one from his private university mailbox (Boston Univ.) and one for official use at the embassy in Washington.

There were no other issues relevant to this subject matter discussed during the meeting. It ended on a cordial note with Gen. Pasha thanking me for providing a clear record of events and asking if it was okay to follow up if other questions arose in the aftermath of his further investigation into the matter.

## **BBM CHAT EXCHANGES WITH HAQQANI ON 28 OCT 2011 – approx 21:55 until 22:33 CET**

Participants:

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Mansoor IJAZ, Husain Haqqani

Messages:

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Husain Haqqani: you can keep saying you delivered a message and show bbm convos to prove it

Husain Haqqani: Basically you don't get it

Husain Haqqani: You have given hardliners in Pak Mil reason to argue there was an effort to get US to conspire against Pak Mil

Husain Haqqani: You are a US citizen

Husain Haqqani: You are supposed to look after US interests

Mansoor IJAZ: I wrote one article. Have not said one word on the record since then to anyone. I think your press is working both sides against the middle, trying to force something out of anyone they can. Period. I don't play in that game

Husain Haqqani: In Pak political situation, getting burned as a US stooge undermines one's effectiveness

Husain Haqqani: I will make sure FO shuts up

Husain Haqqani: Let this die down

Husain Haqqani: We are in the right

Husain Haqqani: We will still make things happen

Mansoor IJAZ: Okay, well I know my IQ is pretty low so you are probably correct in saying I just don't get it.

Husain Haqqani: The Pak press be damned

Husain Haqqani: I stand by you as a man of integrity werving his country

Husain Haqqani: You don't let ppl back home argue I play for your team, not ours

Mansoor IJAZ: But from my point of view, if there was a real threat, as you stated at the time, it is clear you were trying to save a democratic structure from those hawks

Husain Haqqani: You get to write the book on how you changed US-Pak dynamic and won the war in A'tan (w/ some help from a Paki nerd) :D

Mansoor IJAZ: I was happy to get the message in the back door because it served American interests to preserve the democratic civilian setup and the offers made, if achieved, were very much congruent with American objectives in the region

Husain Haqqani: True that, friend. But you know premature revelation ain't good

Mansoor IJAZ: As far as I can see, we did right. Unless there is something I don't see here. But then I'm sorta dumb from down on the farm where them hillbillies live

Husain Haqqani: Hey! Don't run down hillbillies

Husain Haqqani: Even the smartest can miss a piece of the puzzle

Husain Haqqani: You are assuming there are no powerful men in Pak willing to break w/ US. Premature revelation gives those ppl reason to claim 'conspiracy', 'treason'

Husain Haqqani: That is all you missed. Period.

Husain Haqqani: And no one else might tell you this, you're becoming irritable and losing your sense of humor as you grow old

Husain Haqqani: Let this one go. There is much to do. MUCH. And then, there's the beach where I've been waiting to be invited, the slum boy visiting the millionaire

Mansoor IJAZ: I'm not a millionaire. But I do know a nice piece of beach!

Husain Haqqani: I'm not a slum boy either but I know how to make friends with smart people with a sense of history :P

Mansoor IJAZ: Jesus, then what the fuck are you doing hanging around with me? =D

Husain Haqqani: We'll make things happen and if we can't, we'll write a book about it

Husain Haqqani: Who said I was hanging around with you. A minute ago I thought you were about to hang me :D

Mansoor IJAZ: :O

Mansoor IJAZ: Really?

Husain Haqqani: Look, Isloo is a mess. Journos gone wild. Politicos scared of mil. Mil scared of Yanks.

Mansoor IJAZ: Tell me one important thing. Who likes you and who hates you in the US establishment? Who wants you to stay and who wants to fuck you up?

Husain Haqqani: The debate abt your oped has caused my detractors to put pressure on my boss  
Husain Haqqani: In US estab, I can count on Leon and Petraeus  
Mansoor IJAZ: I thought YOU were the boss!  
Mansoor IJAZ: Who is against you?  
Husain Haqqani: Folks at State don't like me  
Mansoor IJAZ: Why?  
Mansoor IJAZ: Too close to AZ?  
Husain Haqqani: They think I am too mixed up w/ DoD and others and do not help them cut deals w/ Pak mil  
Husain Haqqani: Close to AZ bit too  
Husain Haqqani: They are wrong re DoD and others.  
Husain Haqqani: It is just that becoz of A'tan, they are more imp than State  
Mansoor IJAZ: I always thought HRC was one of your fans. She even has a lady from our parts working with her  
Husain Haqqani: It is folks at State who got pissed off by your mission  
Husain Haqqani: She may be but I was Holbrooke's buddy so everyone who hates him hates me  
Husain Haqqani: I have no time for just pushing paper around  
Husain Haqqani: State likes process  
Mansoor IJAZ: Which mission? Sudan, Kashmir, there were so many they got pissed off about. I showed them how to do real American diplomacy and that was like a big pile of shit on their desk they couldn't swallow  
Husain Haqqani: Conferences, statements--with nothing changing  
Husain Haqqani: The latest one  
Mansoor IJAZ: Yeah, I got it. You're right!  
Mansoor IJAZ: Anyway, State will always hate me because I don't accept their muddling way of doing things  
Husain Haqqani: I don't know for a fact but I won't be surprised if the FO statement was prompted by someone here  
Husain Haqqani: Robin Raphel is back as Grossman's deputy  
Husain Haqqani: You stepped on her toes w/ Kashmir mission  
Mansoor IJAZ: That would be typical. But Grossman knows me and he knows how serious I am. Raphael still hates me for the Kashmir intervention where she did everything she could to fuck me up  
Husain Haqqani: And now they hate me more when folks back home who hate me tell them you and I might have been together on s'thing (whether we were or not is irrelevant to them)  
Husain Haqqani: Grossman is good but he doesn't like anyone playing a larger than life role. Old school  
Husain Haqqani: That's why I have been requesting you to let this one go  
Mansoor IJAZ: Yeah I know. Found that out when he was our lobbyist. But he's a good guy  
Husain Haqqani: That takes attention off me  
Mansoor IJAZ: Hmmmmmmmmm..... Not sure anything could take attention off you  
Husain Haqqani: I try and make peace with State and focus on battles at home  
Husain Haqqani: HaHa :D  
Mansoor IJAZ: Diplomacy at its finest!!!  
Husain Haqqani: Yeah, right! But at least I shd not be painted as playing for your team  
Mansoor IJAZ: Why not? You were a good quarterback for those three days!!  
Husain Haqqani: I want to solve f\*\*\*ing problems not fight a rearguard action all the time  
Husain Haqqani: :x  
Husain Haqqani: Let us wait and see if Hillary's latest foray changes things in any direction  
Mansoor IJAZ: Did we really solve a true problem or was this all smoke and mirrors?  
Mansoor IJAZ: I mean on those days of stress...  
Husain Haqqani: View here is that everyone in Isloo sucks!  
Mansoor IJAZ: That's pretty much true!!!!  
Husain Haqqani: Too early to say re solution  
Mansoor IJAZ: But if they all suck, then what did we save -- a sinking ship that was going to sink anyway???  
Husain Haqqani: And there is a genetic problem at that end, predisposed to going round and round in circles  
Mansoor IJAZ: Yup!! That's for damn sure  
Husain Haqqani: I think we save the situation from an extremely violent outcome  
Mansoor IJAZ: How can you solve the problems you understand so well from here if all the people in charge over there are wrong? It's only one year til we have a change in the US. Then you really won't like who we have here!  
Husain Haqqani: I mean, Iran might have done better if the Shah had been saved AND some true reform introduced  
Husain Haqqani: Actually, I think the new ppl here might be better to deal with

Husain Haqqani: They won't take lies easily  
Mansoor IJAZ: Don't bet on it. We have a lot of extremists cropping up and seeping into the system  
Mansoor IJAZ: They don't trust anything Pakistani  
Mansoor IJAZ: Don't matter what it is  
Husain Haqqani: Well, in that case find me a cheap piece of beach  
Mansoor IJAZ: Cain, Romney (who hates Muslims), Perry -- its all the same crap  
Mansoor IJAZ: Hmmmmm, yes, I can arrange that  
Mansoor IJAZ: Why is Z such an idiot?  
Husain Haqqani: But don't go off writing opeds abt arranging piece of beach w/out consulting first :P  
Husain Haqqani: HaHa! Tough question  
Husain Haqqani: I have a speech in 20 mins so let's keep that for later  
Husain Haqqani: Bye for now  
Mansoor IJAZ: Okay. Good luck.  
Husain Haqqani: Thank you!

### **BBM CHAT EXCHANGES WITH HAQQANI ON 01 NOV 2011 – 22:06, then 22:31 until 23:03**

Participants:

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Mansoor IJAZ, Husain Haqqani

Messages:

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Mansoor IJAZ: Hi buddy, I understand you/ your foreign office hacks are commissioning hatchet pieces against me. Unfortunate.... very unfortunate  
Husain Haqqani: I will enquire and stop them. There's no need for any of this.  
Husain Haqqani: You haven't helped by engaging so much w/ Pak media.  
Husain Haqqani: What happened to the 'silent soldier'?  
Mansoor IJAZ: I issued a statement that was designed to put an end to all of this after Imran Khan's rally nonsense. But be that as it may,  
I'm not going to tolerate character assassination in any of this  
Husain Haqqani: I agree  
Husain Haqqani: Will do my best to prevent it  
Mansoor IJAZ: Roger that  
Husain Haqqani: Focus on your policy message instead of who did what and we can turn this around  
Mansoor IJAZ: Please remind your boss that his beloved wife, who later became a good friend of mine, tried the same bullshit tactics in 1996 when Maleeha was envoy -- result: her government was dismissed in Nov 1996.  
Mansoor IJAZ: I'm not someone he can mess around with. He better get that message from me and really understand it  
Husain Haqqani: My response to Imran was very simple and true: I did not write a treasonous letter and if Imran has a copy, he should present it  
Husain Haqqani: I don't think your threatening helps  
Mansoor IJAZ: That's true from my point of view as well. But politicians are politicians  
Mansoor IJAZ: I don't make threats. I state facts. Your boss needs reminding of the facts  
Husain Haqqani: Are you sure your side won't deny?  
Mansoor IJAZ: No, maybe they will. But that would also be a mistake. Too much proof on that side as well.  
Husain Haqqani: But does "proving" help anything?  
Husain Haqqani: Is it not the nature of a private mission that officials deny it?  
Mansoor IJAZ: Don't know. Don't care. My point is simple -- I've said what I was going to. Attacks on my person will not be tolerated. And my statement stands. Stop telling lies about me and I might just stop telling the truth about you  
Husain Haqqani: If you were to listen to my advice, you would let this blow over and prove yourself afterwards. You are the one who will outlast the flying shit :)  
Husain Haqqani: That is usually my strategy: be there when the others have self-destructed or blown over

Mansoor IJAZ: I've kept to my word -- if everyone wants to call it a fabrication and make me the fall guy, then gloves come off and it's not going to be fun or pretty for anyone

Mansoor IJAZ: You did something you thought was right outside channels because you felt it would be the most effective way to get the job done.

I helped you execute. I haven't thrown you under the bus. But be damn sure I won't let anyone do that to me

Husain Haqqani: I'll do what I can to keep it pretty

Husain Haqqani: I haven't. I won't.

Mansoor IJAZ: By the way, I know a lot more than you give me credit for about the circumstances that led to May 1 and your role in all that. Just FYI

Husain Haqqani: Honorable ppl stick with one another. Take care.

Mansoor IJAZ: ;)

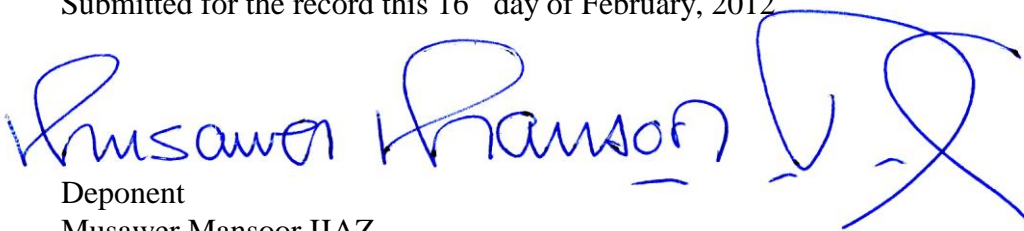
**BBM CHAT FROM HAQQANI ON 02 NOV 2011 at 03:42**

Husain Haqqani: I am maintaining silence so pls check with me before reacting if some Pak journo attributes anything to me

This completes my Witness Statement to the Commission. I wish to thank this august body for permitting me to be heard in completeness. I remain ready to answer any of your questions. I wish the Commission God's speed in addressing the important issues raised by this matter.

Thank you, Chairman and the members of this Honourable Commission, for your time and your attention in this matter of great national importance.

Submitted for the record this 16<sup>th</sup> day of February, 2012

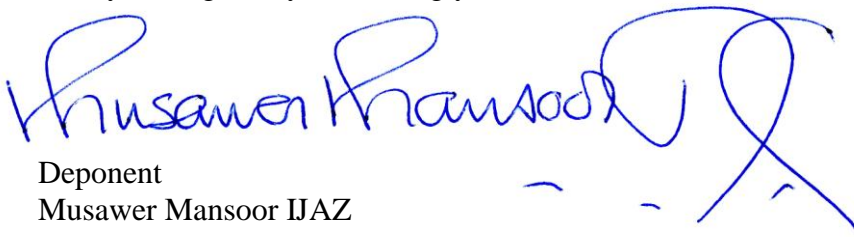


Deponent

Musawer Mansoor IJAZ

**VERIFICATION:**

Verifying on solemn affirmation on this 16<sup>th</sup> day of February, 2012 at London that all content of this affidavit, oral as well as printed in script from blackberry, email and other devices are absolutely true, honest and sincere to the best of my knowledge and nothing has been deposed falsely, ambiguously and wrongly.



Deponent

Musawer Mansoor IJAZ

**EXHIBITS-A, B, C, D, E, F, G, H and I are attached herewith and form an integral part of this Statement and BBM SCREEN SHOTS + HANDWRITTEN NOTES are attached.**

**BEFORE THE HONOURABLE COMMISSION CONSTITUTED BY THE HONOURABLE SUPREME COURT OF PAKISTAN VIDE ORDER DATED DECEMBER 30, 2011 PASSED IN CONSTITUTION PETITIONS NOS. 77 TO 85 & 89 OF 2011 & CMA NO. 5505/2011 IN CONSTITUTIONAL PETITION NO.79 OF 2011**

**IN THE MATTER OF INQUIRY IN TO THE QUESTIONED MEMORANDUM**

**WITNESS STATEMENT UNDER OATH  
OF  
MUSAWER MANSOOR IJAZ**

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