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Attorneys for Plaintiff STEPHEN RUSSELL

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

STEPHEN RUSSELL, an individual,

Plaintiff,

vs.

NIR MAMAN, An Individual; CT707  
ISRAELI KRAV SYSTEMS, INC., an  
Ontario Corporation; GEORGE  
AKKELQUIST, an Individual; DFW  
METROPLEX TRAINING ACADEMY, a  
New York Entity Form Unknown; and  
DOES 1 Through 20, Inclusive,

Defendants.

Case No. 3:18-cv-006691-RS

**DECLARATION OF NED M. GELHAAR,  
ESQ. IN SUPPORT OF PLAINTIFF'S  
OPPOSITION TO DEFENDANTS'  
MOTIONS TO STAY THIS ACTION  
PENDING RESOLUTION OF THE  
RELATED CRIMINAL INVESTIGATION**

Date: March 14, 2019

Time: 1:30 p.m.

Dept.: Ctrm 3 – 17<sup>th</sup> Floor

Judge: Honorable Richard Seeborg

Complaint Filed: November 2, 2018

Trial Date: None Set

**DECLARATION OF NED M. GELHAAR, ESQ.**

I, Ned M. Gelhaar, declare:

1. I am a shareholder of the law firm Enenstein Pham & Glass, counsel for Plaintiff Stephen Russell (“Russell”) in this matter. The following information is true of my own personal knowledge, and if called as a witness in this proceeding, I could and would competently testify thereto. I submit this declaration in support of Plaintiff’s Opposition to Defendants’ Motions to Stay this Action Pending Resolution of the Related Criminal Investigation.

2. On January 17, 2019, Russell served similar sets of Requests for Production of Documents on all Defendants. Attached hereto as **EXHIBIT A** is a true and correct copy of the Request for Production of Documents served on Defendant George Akkelquist. Attached hereto as **EXHIBIT B** is a true and correct copy of the Request for Production of Documents served on Defendant Nir Maman. Attached hereto as **EXHIBIT C** is a true and correct copy of the Request for Production of Documents served on Defendant DFW Metroplex Training Academy. Attached hereto as **EXHIBIT D** is a true and correct copy of the Request for Production of Documents served on Defendant CT 707 Israeli Krav Systems, Inc.

3. Russell has also served or attempted to serve six (6) third party witnesses who Russell believes observed Defendants’ conduct with deposition subpoenas and documents requests. Attached hereto as **EXHIBIT E** is a true and correct copy of the deposition subpoena and document requests served on Albert Timen. Attached hereto as **EXHIBIT F** is a true and correct copy of the deposition subpoena and document requests served on Thomas LeFreniere. Attached hereto as **EXHIBIT G** is a true and correct copy of the deposition subpoena and document requests for Bryan Crutcher. Attached hereto as **EXHIBIT H** is a true and correct copy of the deposition subpoena and document requests for Tara Walsh. Attached hereto as **EXHIBIT I** is a true and correct copy of the deposition subpoena and document requests for Joseph Prendergast. Attached hereto as **EXHIBIT J** is a true and correct copy of the deposition subpoena and document requests for Ryan

1 Micheletti.

2 4. On February 7, 2019, I sent Defendants' counsel Rod Divelbiss and Dek  
3 Ketchum notice and courtesy copies of the first five (5) deposition subpoenas, and  
4 communicated that we would cooperate with them regarding scheduling of the depositions.  
5 Attached hereto as **EXHIBIT K** is a true and correct copy of the correspondence I sent to  
6 Defendants' counsel on February 7, 2019.

7 5. I reached out to Defendants' counsel in an effort to set dates for Fed. R. Civ.  
8 P. 30(b)(6) depositions of the Corporate Defendants seeking primarily to find out what  
9 became of the \$1,000,000 payment that Defendants Maman and Akkelquist represented had  
10 been expended on "intel operations." Attached hereto as **EXHIBIT L** is a true and correct  
11 copy of the letter I sent to Defendants' counsel on February 13, 2019.

12 6. Defendants' counsel have not responded to this request, nor have they served  
13 FRCP 2(a)(1) Initial Disclosures or responded to Russell's requests for production of  
14 documents—taking the position that the filing of this motion excused any obligation to do  
15 so.

16 7. Defendants have filed a Motion for Protective Order Staying Discovery and  
17 Initial Disclosures Pending Consideration of Defendants' Motion to Stay Litigation Until  
18 Conclusion of the Criminal Investigation (Dkt. 33), to be heard on March 21, 2019.

19 I declare under penalty of perjury under the laws of the State of California that the  
20 foregoing is true and correct.

21  
22 Executed this 19th day of February.

23  
24  
25 

26 \_\_\_\_\_  
27 NED M. GELHAAR, ESQ.  
28 Declarant

# **Exhibit A**

1 DARREN S. ENENSTEIN (SBN 195894)

Email: *dse@enensteinlaw.com*

2 NED M. GELHAAR (SBN 163185)

Email: *ngelhaar@enensteinlaw.com*

3 NIMA KAMALI (SBN 294401)

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5 **ENENSTEIN PHAM & GLASS**

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7 Los Angeles, California 90025

8 Tel.: (310) 899-2070

9 Fax: (310) 496-1930

Attorneys for Plaintiff STEPHEN RUSSELL

10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12 **STEPHEN RUSSELL**, an individual,

Case No. 4:18-cv-06691-RS

13 Plaintiffs,

**PLAINTIFF STEPHEN RUSSELL'S  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS, SET ONE TO  
GEORGE AKKELQUIST**

14 vs.

16 **NIR MAMAN**, an individual; **CT707**

17 **ISRAELI KRAV SYSTEMS, INC.**,

an Ontario corporation; **GEORGE**

18 **AKKELQUIST**, an individual; **DFW**

19 **METROPLEX TRAINING**

**ACADEMY**, a New York entity form

20 unknown, and **DOES 1 through 20**,

21 inclusive,

22 Defendants.

1 **PROPOUNDING PARTY: Plaintiff, STEPHEN RUSSELL**

2 **RESPONDING PARTY: Defendant, GEORGE AKKELQUIST**

3 **SET: ONE (1)**

4 Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff, Stephen  
5 Russell, ("Russell") hereby requests that Defendant, George Akkelquist,  
6 ("Defendant") identify and product the originals or best available copies of the  
7 writings and other things described below for inspection and copying within the time  
8 and in the manner prescribed by the Federal Rules of Civil Procedure. The place for  
9 inspection shall be the law offices of Eenstein Pham & Glass, 12121 Wilshire  
10 Boulevard, Suite 600, Los Angeles, California 90025.

11 **DEFINITIONS**

12 1. "YOU," "YOUR," or "AKKELQUIST" means defendant GEORGE  
13 AKKELQUIST, and any or all of his agents and/or representatives.

14 2. "RUSSELL" means STEPHEN RUSSELL, and any or all of his agents  
15 and/or representatives.

16 3. "COMMUNICATION(S)" means any form of communication or  
17 correspondence whether oral or written between one or more persons, including but  
18 not limited to, letters, memoranda, cards, circulars, bulletins, dispatches,  
19 notifications emails, text messages, recordings of oral conversations blog posts,  
20 information transmitted through social network websites whether produced,  
21 reproduced or stored USB disk drives, data cells or other media or data compilation  
22 from which information can be obtained, including originals, copies (with or without  
23 notes or changes thereon) and drafts, including, but not limited to, papers, books,  
24 letters, tangible things, correspondence, telegrams, cables, telex messages,  
25 memoranda, notes, notations, work papers, transcripts, minutes, reports, recordings  
26 of telephone conversations, or interviews or of conferences, or other meetings,  
27 affidavits, statements, summaries, opinions, reports, studies, work sheets, proposals,  
28 contracts, agreements, statistical records, desk calendars, appointment books,

1 diaries, lists, tabulations, sound recordings, computer printouts, data processing  
2 output and input, microfilms, photographs or negatives thereof, all other records kept  
3 by electronic, photographic or mechanical means, and any or all matter or material  
4 attached or affixed to any of the above.

5 4. "DOCUMENT(S)" means any handwriting, typewriting, printing,  
6 photostating, photographing, photocopying, transmitting by electronic mail or  
7 facsimile, and every other means of recording upon any tangible thing any form of  
8 communication or representation, including letters, words, pictures, sounds, or  
9 symbols, or combinations thereof, and any record thereby created, regardless of the  
10 manner in which the record has been stored.

11 5. "REFER(S)", "RELATED TO," "RELATES TO," or "RELATE TO"  
12 means to constitute, embody, identify, evidence, reflect, record, show, memorialize,  
13 consist of, discuss, describe, mention, concern, consider, evaluate, review, analyze,  
14 report on, support, or bear upon the subject matter of the request.

15 6. "MAMAN" means named Defendant Nir Maman.

16 7. "RELEVANT TIME PERIOD" means January 1, 2017 to the present.

17 8. "ENTITY" means any organization, company, and/or corporation,  
18 including any government, public, and/or private organization.

19 9. "SECURITY SERVICES" means any services provided to RUSSELL  
20 RELATED to security, protection, cyber-security, surveillance, counter-  
21 surveillance, threat risk assessment and mitigation, infrastructure and disruptive  
22 environment protection, investigation, intelligence, and/or counter intelligence  
23 services.

### 24 INSTRUCTIONS

25 1. This Request for Production covers all responsive  
26 COMMUNICATIONS and DOCUMENTS in your possession, custody or control,  
27 including COMMUNICATIONS and DOCUMENTS that are in the possession,  
28 custody or control of your agents or representatives, unless privileged or exempted

1 from production under federal law.

2 2. For each written response:

3 a. Produce responsive COMMUNICATIONS and DOCUMENTS;

4 b. Produce all electronically stored COMMUNICATIONS and  
5 DOCUMENTS in both hard copy and native format;

6 c. State whether you have produced all responsive  
7 COMMUNICATIONS and DOCUMENTS;

8 d. State all objections to any request with specificity, and if the event  
9 an objection relates only to a part or portion of a request, specify the part or portion  
10 of the response objected to and state whether you have produced or intend to permit  
11 inspection and copying of the remaining parts or portions; and;

12 e. Organize all COMMUNICATIONS and DOCUMENTS and  
13 things produced for inspection, by among other things, labeling the  
14 COMMUNICATIONS and DOCUMENTS and categorizing them to correspond to  
15 the Requests.

16 3. In the event that any COMMUNICATION or DOCUMENT or other  
17 thing called for by any request has been destroyed, discarded, or otherwise disposed  
18 of, that COMMUNICATION or DOCUMENT or other thing is to be identified as  
19 completely as possible, and the following information is to be provided: date of  
20 disposal, manner of disposal, reason for disposal, person authorizing the disposal,  
21 and person disposing of the document or other thing.

22 4. If you claim that the attorney-client privilege or the attorney work-  
23 product doctrine is applicable to any responsive COMMUNICATION or  
24 DOCUMENT, then you shall state with respect to that COMMUNICATION or  
25 DOCUMENT:

26 a. The reason for withholding the COMMUNICATION or  
27 DOCUMENT;

28 b. The date the COMMUNICATION or DOCUMENT was created;

1 c. The identity of the COMMUNICATION or DOCUMENT'S  
2 author, including employment title and description, current address, and telephone  
3 number;

4 d. The identity of each person to whom the COMMUNICATION  
5 or DOCUMENT was sent, including employment title and description, current  
6 address, and telephone number;

7 e. The custodian of the COMMUNICATION or DOCUMENT,  
8 including employment title and description, current address, and telephone number;  
9 and

10 f. A description of the COMMUNICATION or DOCUMENT  
11 sufficient to permit Endurance and the Arbitrators to assess the validity of any  
12 privilege, immunity, or exemption asserted.

13 5. This Request for Production is continuous in nature. If you discover  
14 additional documents called for by this Request, then promptly amend and  
15 supplement your responses and production.

16 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

17 **REQUEST FOR PRODUCTION NO. 1**

18 All DOCUMENTS RELATING to AKKELQUIST'S introduction to  
19 RUSSELL.

20 **REQUEST FOR PRODUCTION NO. 2**

21 All DOCUMENTS RELATING to AKKELQUIST'S COMMUNICATIONS  
22 with RUSSELL at any time from his introduction to RUSSELL to the present.

23 **REQUEST FOR PRODUCTION NO. 3**

24 All DOCUMENTS RELATING to the SECURITY SERVICES provided by  
25 AKKELQUIST to RUSSELL during the RELEVANT TIME PERIOD

26 **REQUEST FOR PRODUCTION NO. 4**

27 All COMMUNICATIONS RELATING to the SECURITY SERVICES  
28 provided by AKKELQUIST to RUSSELL from January 1, 2018 to the present.

1 **REQUEST FOR PRODUCTION NO. 5**

2 All DOCUMENTS evidencing and/or RELATING to an accounting of all  
3 SECURITY SERVICES provided by AKKELQUIST to RUSSELL during the  
4 RELEVANT TIME PERIOD.

5 **REQUEST FOR PRODUCTION NO. 6**

6 All DOCUMENTS evidencing and/or RELATING to any contracts between  
7 AKKELQUIST and RUSSELL.

8 **REQUEST FOR PRODUCTION NO. 7**

9 All COMMUNICATIONS RELATING to and/or referencing RUSSELL  
10 from the RELEVANT TIME PERIOD.

11 **REQUEST FOR PRODUCTION NO. 8**

12 All DOCUMENTS RELATING to any payments requested from RUSSELL  
13 by AKKELQUIST from the RELEVANT TIME PERIOD.

14 **REQUEST FOR PRODUCTION NO. 9**

15 All DOCUMENTS RELATING to any monies paid by RUSSELL to  
16 AKKELQUIST from the RELEVANT TIME PERIOD.

17 **REQUEST FOR PRODUCTION NO. 10**

18 All COMMUNICATIONS to any subcontractors retained by YOU to provide  
19 SECURITY SERVICES to RUSSELL from the RELEVANT TIME PERIOD.

20 **REQUEST FOR PRODUCTION NO. 11**

21 All DOCUMENTS RELATING to any payments made to third parties to  
22 provide SECURITY SERVICES to RUSSELL from the RELEVANT TIME  
23 PERIOD.

24 **REQUEST FOR PRODUCTION NO. 12**

25 All COMMUNICATIONS between AKKELQUIST and RUSSELL from the  
26 RELEVANT TIME PERIOD.

27 ///

28 ///

1 **REQUEST FOR PRODUCTION NO. 13**

2 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
3 to RUSELL of any threats against RUSSELL.

4 **REQUEST FOR PRODUCTION NO. 14**

5 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
6 that RUSSELL was in danger.

7 **REQUEST FOR PRODUCTION NO. 15**

8 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
9 that there were threats to RUSSELL's safety.

10 **REQUEST FOR PRODUCTION NO. 16**

11 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
12 of threats against the safety of RUSSELL'S family.

13 **REQUEST FOR PRODUCTION NO. 17**

14 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
15 that RUSSELL's family was in danger.

16 **REQUEST FOR PRODUCTION NO. 18**

17 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
18 that there were threats against RUSSELL'S business interests.

19 **REQUEST FOR PRODUCTION NO. 19**

20 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
21 that RUSSELL's business interests were in danger.

22 **REQUEST FOR PRODUCTION NO. 20**

23 All COMMUNICATIONS between AKKELQUIST and RUSSELL's  
24 security personnel from the RELEVANT TIME PERIOD.

25 **REQUEST FOR PRODUCTION NO. 21**

26 All COMMUNICATIONS between MAMAN and AKKELQUIST  
27 REFERRING to RUSSELL.

28 ///

1 **REQUEST FOR PRODUCTION NO. 22**

2 AKKELQUIST's license from the California Bureau of Security and  
3 Investigative Services.

4 **REQUEST FOR PRODUCTION NO. 23**

5 All DOCUMENTS evidencing and/or RELATING to any license of  
6 AKKELQUIST to provide security services

7 **REQUEST FOR PRODUCTION NO. 24**

8 All DOCUMENTS evidencing and/or RELATING to any license of  
9 MAMAN to provide investigative services.

10 **REQUEST FOR PRODUCTION NO. 25**

11 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
12 that there was ongoing unwanted surveillance of RUSSELL by third parties.

13 **REQUEST FOR PRODUCTION NO. 26**

14 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
15 of government investigations of RUSSELL.

16 **REQUEST FOR PRODUCTION NO. 27**

17 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
18 that individuals had active hits out for RUSSELL'S life.

19 **REQUEST FOR PRODUCTION NO. 28**

20 All DOCUMENTS evidencing and/or RELATING to the SECURITY  
21 SERVICES budget estimated by AKKELQUIST.

22 **REQUEST FOR PRODUCTION NO. 29**

23 All DOCUMENTS evidencing and/or RELATING to whom/where payments  
24 made by RUSSELL were used towards the SECURITY SERVICES.

25 **REQUEST FOR PRODUCTION NO. 30**

26 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
27 affiliation with the United States National Security Agency.

28 ///

1 **REQUEST FOR PRODUCTION NO. 31**

2 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
3 affiliation with the United States Central Intelligence Agency.

4 **REQUEST FOR PRODUCTION NO. 32**

5 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
6 affiliation with the United States Federal Bureau of Investigation

7 **REQUEST FOR PRODUCTION NO. 33**

8 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
9 affiliation with Israeli Government.

10 **REQUEST FOR PRODUCTION NO. 34**

11 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
12 affiliation with any governmental agency.

13 **REQUEST FOR PRODUCTION NO. 35**

14 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
15 professional experience in providing SECURITY SERVICES.

16 **REQUEST FOR PRODUCTION NO. 36**

17 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
18 position as the Head of Security for MGM Grand Hotels.

19 **REQUEST FOR PRODUCTION NO. 37**

20 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
21 position as the Master Instructor to DHS Fusion Centers on Countering Violent  
22 Extremists.

23 **REQUEST FOR PRODUCTION NO. 38**

24 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
25 position in the FBI National Joint Terrorism Task Force Subject Matter Expert on  
26 all tactical and strategic operations.

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28 ///

1 **REQUEST FOR PRODUCTION NO. 39**

2 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
3 position in the FBI Academy in Service Master Instructor Subject Matter Expert on  
4 tactical Countering Violent Extremists Operations.

5 **REQUEST FOR PRODUCTION NO. 40**

6 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
7 position in the United States Central Command in the United States as part of  
8 Operation Enduring Freedom.

9 **REQUEST FOR PRODUCTION NO. 41**

10 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S CIA  
11 Training/Force Multiplier in the United States Army Infantry and Special  
12 Operations.

13 **REQUEST FOR PRODUCTION NO. 42**

14 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
15 training at the Tactical/Sniper School French FL.

16 **REQUEST FOR PRODUCTION NO. 43**

17 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
18 education at the University of Lebanon.

19 **REQUEST FOR PRODUCTION NO. 44**

20 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
21 education and training.

22 **REQUEST FOR PRODUCTION NO. 45**

23 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
24 nomination for the United States Attorney General Award.

25 **REQUEST FOR PRODUCTION NO. 46**

26 All DOCUMENTS evidencing and/or RELATING to AKKELQUIST'S  
27 receipt of the FBI Director's Award for Excellence in Investigations.

28 ///

1 **REQUEST FOR PRODUCTION NO. 47**

2 All DOCUMENTS RELATING to any allegations of misconduct by  
3 AKKELQUIST from any ENTITY.

4 **REQUEST FOR PRODUCTION NO. 48**

5 All DOCUMENTS RELATING to any disciplinary action taken against  
6 AKKELQUIST by any ENTITY.

7 **REQUEST FOR PRODUCTION NO. 49**

8 All DOCUMENTS RELATING to any investigations into AKKELQUIST for  
9 misconduct by any ENTITY.

10  
11 DATE: January 17, 2018

ENENSTEIN PHAM & GLASS

12  
13 BY:

14 /s/ Ned M. Gelhaar

15 Darren S. Enenstein, Esq.  
16 Ned M. Gelhaar Esq.  
17 Joy D. Llaguno, Esq.  
18 Attorneys for Plaintiff  
19 Stephen Russell  
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**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is: 12121 Wilshire Boulevard, Suite 600, Los Angeles, California 90025.

On January 17, 2019, I served the foregoing document(s) entitled: **PLAINTIFF STEPHEN RUSSELL'S REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE TO GEORGE AKKELQUIST**, on the following interested party/ies:

ROD DIVELBISS  
JRA LAW PARTNERS, LLP  
450 Pacific Avenue, Suite 200  
San Francisco, CA 94133

DEK KETCHUM  
LAW OFFICES OF DEK KETCHUM  
900 Veterans Boulevard, Suite 600  
Redwood City, California 94063

*Attorneys for Defendants*  
*NIR MAMAN and CT707 ISRAELI*  
*KRAV SYSTEMS, INC.*

*Attorneys for Defendants*  
*GEORGE AKKELQUIST and DFW*  
*METROPLEX TRAINING ACADEMY*

**[X] BY PERSONAL SERVICE:** Placing the document(s) listed above in a sealed envelope(s) and by causing personal delivery of the envelope(s) to the person(s) at the address(es) set forth above.

I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed this 17th day of January, 2019, in Los Angeles County, California.

/s/ Omar Rodriguez  
OMAR RODRIGUEZ

**EXHIBIT "1"**

# **NIR MAMAN**

## ***CURRICULUM VITAE***

**- Confidential -**

**This document contains sensitive information and is  
intended for addressee only.**

## CURRICULUM VITAE

**NAME:** Nir Maman

**ADDRESS:** 800 Steeles Avenue West  
Unit B-10, Suite 178  
Thornhill, Ontario, L4J 7L2  
Canada

**CONTACT NUMBER:** Canada: (416) 999-2492

**E-MAIL:** nidf@rogers.com

**Federal Security Clearances – Canada:** Government of Canada  
Level 2 – Secret Clearance

**Israel:** Israeli Defense Force / Ministry of Defense  
Level 3 – Top Secret Clearance

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### **Fields / Summary of Experience:**

- **Ontario Power Generation:** Tactical Officer – Nuclear Tactical Response Force Unit
- **Ontario Judicial Service:** Sworn Peace Officer, Use of Force Instructor
- **Atlantic Police Academy:** Sworn Police Constable, Use of Force, Police Tactics, and Tactical operations instructor.
- **Nomlaki Tribal Police Department:** Sworn Police Officer, Tactical Advisor.
- **Canada Border Services Agency (*Immigration Enforcement Division*):** Use of Force Instructor
- **Israeli Defense Force:** Special Forces Command – Counter-Terror Unit and Counter Terror School  
-Operational Team Leader, Section Commander, Lead Instructor in the fields of Counter Terror Warfare, Tactical Shooting, and Krav Maga.
- **Security and Counter Terror Advisor/Consultant**
- **Diplomatic Security Operations:** Organized and supervised protective details for Diplomatic officials of the Israeli Government traveling into Canada.
- **Instructor Qualifications:** Ontario Police College: Provincial Use of Force Instructor  
Atlantic Police Academy: Use of Force and Tactical Instructor  
Israeli Special Forces Counter Terror and Special Operations School:  
-Counter Terror Warfare Instructor  
-Tactical Shooting Instructor  
-Krav Maga Instructor

**PROFESSIONAL EXPERIENCE:**

01/2012 – **NUCLEAR TACTICAL RESPONSE FORCE OFFICER**  
06/2013 ONTARIO NUCLEAR POWER GENERATION, Ontario, Canada

Duties: Responsible for protecting Ontario Nuclear Power Generation stations, assets, and employees from criminal and terror oriented threats geared at theft of sensitive nuclear materials, sabotage, and deliberate hostile attacks. Duties include conducting foot and armored vehicle patrols of protected areas, observation and surveillance detection, conducting searches of personnel and vehicles entering and exiting controlled and protected areas, escorting transports of sensitive nuclear materials, respond to and investigate various alarms, support the Ontario Nuclear Power Generation Security Officers when needed, enforce various laws, statutes, and regulations as required including the Criminal Code of Canada, Canadian Nuclear Security Regulations Act, the Public Works Protection Act, and the Ontario Trespass to Property Act.

Duties also include receiving intelligence briefs on potential or known threats directed at Ontario Nuclear Power Generation interests, and to remain aware and prepared to respond to Active Shooter attacks or Hostage taking incidents.

Qualification for this position included a three month Basic Tactical Qualification/SWAT Course which includes:

- Introduction to and qualification on various Nuclear industry related systems and elements
- Physical protection systems
- Design Basis Threats
- Intelligence security
- Legal Authorities: Criminal Code of Canada, Nuclear Security Regulations Act, Public Works Protection Act, Trespass to Property Act, Arrest authorities, Use of Force authorities, Search authorities, and the Canada Firearms Act
- Crime scene management and evidence preservation
- Report writing and note taking
- Use of Force: Defensive Tactics, Impact weapons/Expandable baton, O.C. spray, Tactical Handcuffing
- Passive and Active subject arrest
- High Risk subject take-down and arrest
- Tactical firearm manipulation and shooting: semi-automatic handgun (Glock 22 .40 caliber) and Assault Rifle (C8/M4 Carbine 5.56mm)
- Chemical munitions
- Protective CBRN equipment
- Less lethal force/Special Impact Munitions: ARWEN
- Tactical communications
- Patrol operations, routine and high risk vehicle stops
- SMEAC/Intelligence gathering/transferring critical information
- Tactical response options planning for stealth operations, hostage rescue, injured person recovery, and Immediate Rapid Deployment/Active Shooter Intervention
- Field craft and open field tactics and searching
- Tactical Response Operations: Containment, stealth/methodical search operations, hostage rescue, and Immediate Rapid Deployment/Active Shooter Intervention
- Dynamic entry, Distraction devices, and mechanical breaching
- Explosives and IED's
- Light armoured vehicle (LAV) operations

**PROFESSIONAL EXPERIENCE:**

05/2011 – **JUDICIAL ENFORCEMENT OFFICER**  
Present ONTARIO JUDICIAL SERVICE, Toronto, Canada

Status: Sworn Peace Officer

Duties:

- Enforce Judicial orders for various government offices including the Attorney General's office.
- Issue summonses to individuals charged under the Criminal Code and Provincial Offences Act for various Police Services in the GTA.
- Use of Force Instructor: Responsible for qualifying all Ontario Judicial Service Peace Officers in all aspects of Use of Force legalities, authorities, and legislation, as well as all Use of Force options and issued defensive weapons/implements including: defensive tactics, expandable baton, O.C. spray, and tactical handcuffing.

11/2009 – **POLICE TACTICS AND USE OF FORCE INSTRUCTOR**  
Present CANADIAN LAW ENFORCEMENT TRAINING COLLEGE, Toronto, Canada

Duties:

Instruct Recruit classes in the Police Foundations accreditation course of the Canadian Law Enforcement Training College.

Courses of instruction:

- Use of Force Legal Authorities, Justification, and Articulation
- Arrest Authorities/Police Powers
- the Criminal Code of Canada
- Use of Force, including: the National and Provincial Use of Force Model, effective communication methods, defensive tactics, subject control and restraint tactics, defensive expandable baton, tactical handcuffing, subject search.

06/2014 – **TACTICAL ADVISOR**  
Present NOMLAKI TRIBAL POLICE DEPARTMENT, Tehama County, California, United States

Status: Sworn Police Officer

Duties:

- Provide assessment and advisory service to the Nomlaki Tribal Police Department on the implementation and application of Tactical/SWAT operations in relation to on going high-risk situations involving the Nomlaki Tribal Police Department.
- Participate in field deployments to conduct Tactical Operations for Nomlaki Tribal Council interests.

**PROFESSIONAL EXPERIENCE:**

*(Cont'd)*

1998 –  
Present

**SECURITY AND COUNTER-TERROR ADVISOR/CONSULTANT**  
INDEPENDENT CONTRACTOR, Global

Duties:

Assist Government, Corporate, and Civilian entities in developing, enhancing, and deploying security protocols designed to protect people, facilities, and assets against criminal and terror oriented threats. Conduct threat risk assessments to determine relevant security threats and to ensure adequate security measures are in place to mitigate those threats. Past clients include: the Nuclear industry, various schools and synagogues in the Toronto Jewish community, Provincial Government facilities, Military units deploying to hostile zones, Global corporations operating in or setting up operations in volatile regions, communities positioned in volatile regions.

05/2003 –  
03/2005

**POLICE TACTICS, USE OF FORCE AND TACTICAL INSTRUCTOR**  
ATLANTIC POLICE ACADEMY, Prince Edward Island, Canada

Status: Sworn Provincial Police Constable

Duties:

Police Tactics, Use of Force and Tactical Instructor for Police Tactical Units, Police recruits, and Nuclear Tactical Response Force Units.

Courses of Instruction:

- Tactical Operations
- Counter-terrorism and Hostage Rescue Operations
- Immediate Rapid Deployment
- Tactical Shooting and Firearms for: Handgun, Sub-Machine gun, Assault Rifle, and Shotgun
- High-risk security and Response Operations
- Intelligence gathering
- High-risk vehicle takedowns
- High-risk arrest, prisoner handling and searching
- Use of Force: Defensive Tactics, Expandable Baton, Handcuffing, O.C./Pepper Spray

08/2005 –  
09/2006

**USE OF FORCE AND ENFORCEMENT OPERATIONS INSTRUCTOR**  
CANADA BORDER SERVICES AGENCY – IMMIGRATION ENFORCEMENT DIVISION  
Greater Toronto Enforcement Center – Toronto, Ontario

Duties:

Deliver Use of Force training to Immigration Canada Enforcement Officers. Training subjects include use of force legal authorities, defensive tactics, arrest procedures, tactical handcuffing, expandable baton, O.C./pepper spray, tactical communication, and incident report writing. Duties also include conducting testing and evaluations on the Immigration Enforcement Officers to ensure operational proficiency on training material.

**PROFESSIONAL EXPERIENCE:**

*(Cont'd)*

1998 –  
Present

**COUNTER-TERROR, TACTICAL OPERATIONS, OFFICER SURVIVAL INSTRUCTOR**

Duties:

Instruct military, police, and security operation forces across North America in various areas of tactical combat, strategies, and operations. Training subjects include: counter-terror and hostage rescue operations, awareness and defense strategies against conventional and unconventional terrorism and guerrilla warfare, suicide bomber identification and interception, urban warfare, counter-ambush tactics, immediate rapid deployment/active shooter intervention, close protection operations, tactical firearms, and hand-to-hand combat/Krav Maga.

Some of the organizations that I currently train or have trained include:

ONTARIO POLICE COLLEGE – POLICE TACTICS / OFFICER SURVIVAL INSTRUCTORS  
ROYAL CANADIAN MOUNTED POLICE – VARIOUS UNITS  
TORONTO POLICE SERVICE – INTERNATIONAL POLICE OPERATIONS (*AFGHANISTAN DEPLOYMENT TEAMS*)  
TORONTO POLICE SERVICE – COMMUNITY ORIENTED RESPONSE AND PUBLIC ORDER UNIT  
TORONTO POLICE SERVICE – DEFENSIVE TACTICS INSTRUCTORS AND FIREARMS INSTRUCTORS  
HALTON REGIONAL POLICE – USE OF FORCE INSTRUCTORS  
HALTON REGIONAL POLICE – TACTICAL RESPONSE UNIT  
PEEL REGIONAL POLICE – TACTICAL AND RESCUE UNIT  
PEEL REGIONAL POLICE – AIRPORT EMERGENCY RESPONSE UNIT  
DURHAM REGIONAL POLICE – TACTICAL SUPPORT UNIT NUCLEAR SECURITY DIVISION  
YORK REGIONAL POLICE – EMERGENCY RESPONSE UNIT  
CALGARY POLICE SERVICE – TACTICAL AND RESCUE UNIT  
OTTAWA POLICE SERVICE – PRIMARY RESPONSE AND UNIFORM PATROL UNIT  
CANADIAN DEPARTMENT OF NATIONAL DEFENSE  
UNITED STATES FEDERAL LAW ENFORCEMENT TRAINING CENTER – TACTICAL INSTRUCTORS  
UNITED STATES FEDERAL MARSHAL SERVICE  
UNITED STATES FEDERAL AIR MARSHAL SERVICE  
UNITED STATES SECRET SERVICE  
UNITED STATES DIPLOMATIC SECURITY SERVICE  
UNITED STATES COAST GUARD – POLICE DIVISION  
UNITED STATES FEDERAL BUREAU OF INVESTIGATIONS – HOSTAGE RESCUE/SWAT TEAM  
UNITED STATES BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS  
UNITED STATES NATIONAL PARKS POLICE – ENFORCEMENT UNIT  
MERCER COUNTY POLICE ACADEMY – FIREARMS AND DEFENSIVE TACTICS INSTRUCTORS (*U.S.*)  
NEW JERSEY STATE POLICE – SPECIAL WEAPONS AND TACTICS UNIT / T.E.A.M.S. (*U.S.*)  
NEW YORK POLICE DEPARTMENT – EMERGENCY SUPPORT UNIT (*U.S.*)  
PENNSYLVANIA STATE POLICE – USE OF FORCE AND TACTICAL INSTRUCTORS (*U.S.*)  
CINCINNATI POLICE DEPARTMENT – SPECIAL WEAPONS AND TACTICS TEAM (*U.S.*)  
CINCINNATI AIRPORT POLICE – EMERGENCY RESPONSE TEAM (*U.S.*)  
TONAWANDA POLICE DEPARTMENT – SPECIAL WEAPONS AND TACTICS UNIT (*U.S.*)  
UNITED STATES MARINE CORPS – SPECIAL OPERATION UNITS (*JAPAN*)  
UNITED STATES AIRFORCE – BASE POLICE AND SECURITY FORCES (*U.S.*)

**PROFESSIONAL EXPERIENCE:**

(Cont'd)

2001 – **CLOSE PROTECTION OPERATIVE AND OPERATIONS COMMANDER**  
Present

Duties:

Working in conjunction with and under the direction of the Israeli General Security Service and the Israeli Consulate, organize and deploy security details for members of the Israeli Government engaged in political functions in Toronto. Some of the dignitaries I was responsible for protecting included:

Benjamin Netanyahu – Prime Minister of Israel  
Nathan Sharansky – former Deputy Prime Minister of Israel  
Dan Gillerman – Israeli Ambassador to the United Nations  
Kobi Brosh – Israeli Consul General for Toronto  
Shimon Peres – former Israeli Prime Minister and current President  
Ron Huldai – Mayor of Tel Aviv, Israel  
Alon Pinkas – Israeli Ambassador to the United States  
Ranan Gissin – Spokesperson for the Israeli Government

**MILITARY SERVICE:**

10/2006 – **ISRAELI DEFENSE FORCE**  
06/2009 **SPECIAL FORCES COMMAND – COUNTER TERROR UNIT (Unit 707)**  
**COUNTER-TERROR AND SPECIAL OPERATIONS SCHOOL (C.T.S.O.)**

Duties: Section Commander, Operational Team Leader, and Lead Counter-Terror Warfare Instructor

11/2006 to 07/2007 – Counter-Terror Warfare Operator and Instructor Qualification course.

Certified as an instructor in the areas of:

- Counter-Terror and hostage rescue operations
- Urban warfare/Close-quarters-combat
- Immediate Rapid Deployment for Active Shooter/Terror Attack Intervention
- Stealth search operations, High risk arrest and prisoner handling
- Aircraft, train, ship, and bus interdiction
- Close-protection operations
- Undercover Counter-terror intelligence operations
- Suicide bomber identification and interception
- Tactical firearms: Semi-automatic handgun (Glock 19/17 9mm, Sig Sauer P228 9mm), Sub-machine gun (Mini/Micro Uzi 9mm), Assault Rifle (AR-15/M4 Carbine 5.56mm)
- Krav Maga (*Israeli Military hand-to-hand combat/Defensive tactics system*)

Duties:

1 – Commander of the Counter-Terror School's International Training Section.  
Responsibilities include developing and delivering Counter-terror training to Special Forces units from International countries, including the United States (*Army Special Forces, Delta, Marines Special Operations Command, Rangers, Asymmetrical Warfare Group*) that attend the I.D.F. Counter-Terror School for specialized training in preparation for high risk operational deployments such as Iraq and Afghanistan. Responsibilities also included liaising and communicating with International Special Forces Unit Commanders to assess their Unit's operational requirements and develop training according to those requirements, and representing the Counter-Terror School at international joint forces training missions.

**MILITARY SERVICE:**

*(Cont'd)*

Counter-Terror Unit and Counter-Terror and Special Operations School duties continued:

- 2 – Lead instructor on the Designated Hostage Rescue Take-over Units Instruction Section. Responsibilities include delivering first phase training (new recruits) and second phase training (revision and recertification) to the I.D.F.'s Designated Hostage Rescue Take-over units (unit 767 Sayeret Matkal, unit S13 Navy SEALs, and unit 7707 Lotar Eilat) in all areas of Counter-Terror and Hostage Rescue operations.
- 3 – Assigned to the C.T.S.O. School's Chief Instruction and Research and Development Section. Responsibilities include researching and developing Counter-Terror tactics, methodologies, and strategies and to integrate those elements into the School's teaching mandate by developing lesson plans and training the school's Counter-Terror instructors. Some of the subjects I was responsible for developing and integrating into the Israeli Defense Force's teaching mandate which all I.D.F. Special Forces units are trained in today include: Immediate Rapid Deployment for Active Shooter/Terror attack in open terrain, Combat in Built-up/Urban Areas, the use of the ballistic shield in urban warfare, Single operative Counter-Terror Combat Tactics. Responsibilities also include the assessment of current operational tactics used by all I.D.F. Special Forces units and to evaluate the success ratios of those tactics during operational deployments.
- 4 – Krav Maga instructor. Responsible for developing tactics for Special Forces units with mission specific tasks that require the use of empty handed/unarmed combat strategies. Responsibilities also include training the C.T.S.O. School's Krav Maga instructors.
- 5 – Team Leader on the Operational Counter-Terror Unit. Deployments include Direct Action missions, Active Shooter incident response, high-risk entries and searches of terrorist strongholds, high-risk arrests, and covert infiltration intelligence gathering operations throughout various regions in Israel including the Gaza Strip, the West Bank, and active border points.

- Achievements:**
- Received two Commendation Awards for Outstanding Service from two separate Special Ground Forces Commands for my work in developing and enhancing Counter-Terror methodologies and tactics for the Israeli Special Forces and for exceptional service in commanding the C.T.S.O. School's International Training Section.  
*-Selected among 1500 nominated soldiers from the Ground Forces Command.*
  - Participated in and led counter-terror and direct action missions targeting active terror organizations/cells and terrorists including counter guerrilla operations, covert infiltration into hostile environments to conduct various operations, immediate rapid deployment for active terror attacks, high-risk entries, searches, and arrests, dynamic entries, secure/stealth searches.
  - Developed specialized training programs in the subject matters of Counter Terror Warfare, Hostage Rescue, Tactical Firearms Manipulation and Shooting, and Krav Maga and delivered this training to thousands of soldiers from the Israeli Special Forces, the United States of America Special Forces, and other foreign Nations Special Forces Units.

## **CERTIFICATIONS AND SKILLS:**

LANGUAGES: Fluent in English, Hebrew, and French

### **MEDICAL EMERGENCY FIRST RESPONDER CERTIFICATION:**

-Certified in Emergency First-Aid and CPR through the Canadian Red Cross Society

### **POLICE TACTICAL OPERATIONS CERTIFICATION:**

-Basic Tactical Orientation Course (Provincial Tactical Officer Qualification)  
Ontario Power Generation Nuclear Response Force (Ontario, Canada)  
-Special Weapons and Tactics and Hostage Rescue Qualification Course  
Criminal Justice Training Center – Macomb County Police Academy (Michigan, U.S.A.)

### **POLICE USE OF FORCE AND TACTICAL INSTRUCTOR CERTIFICATION:**

-Certified Provincial Use of Force Instructor – Ontario Police College  
-Qualified Use of Force and Tactical Instructor – Atlantic Police Academy  
-Certified Police Defensive Expandable Baton Instructor – Armament Systems and Procedures (ASP)  
-Certified Police Tactical Handcuffing Instructor – Armament Systems and Procedures (ASP)  
-Certified Instructor for Defensive Tactics, Expandable Baton, and Tactical Handcuffing – PPCT Systems  
-Qualified and approved Use of Force Instructor for the private security field – Ontario Provincial Police

### **UNARMED COMBAT / MARTIAL ARTS EXPERIENCE:**

-Over 30 years of extensive training and instructing experience in:

- Krav Maga (*Israeli Military Close Quarters Defensive Tactics System*) – 1<sup>st</sup> degree black belt
- Combat Hap Ki Do – 1<sup>st</sup> degree black belt
- W.T.F. Tae kwon Do – 1<sup>st</sup> degree black belt
- Jeet Kune Do

### **FIREARMS CERTIFICATION AND EXPERIENCE:**

-Possess a valid Canadian Firearms license – possession and acquisition for restricted and non-restricted firearms  
-Certified Law Enforcement Tactical Handgun Instructor – SIGARMS Academy  
-Certified Law Enforcement Armorer for SIG semi-automatic pistols – SIGARMS Academy  
-Qualified Range Safety Officer – Atlantic Police Academy  
-Qualified Firearms Instructor – Chief Firearms Office / Ontario Provincial Police  
-Qualified and approved Use of Force and Firearms Instructor for the Armored Car and Armed Guard field – Chief Firearms Office / Ontario Provincial Police  
-Extensive knowledge and experience in the instruction and use of various firearms and weapons for combat and self-defense including:

- Assault Rifles – Colt M-16/A1 / AR-15 / M4, Tavor, AK-47
- Sub-machine guns – HK-MP5, Uzi, mini/micro Uzi
- Shotguns – Remington 870, 12 gauge
- Handguns – Glock 17/22, Sig-Sauer P226/228

## **PROFESSIONAL ACCOMPLISHMENTS:**

### ➤ **ONTARIO POLICE COLLEGE**

- Subject Matter Resource to the Ontario Police College instruction sections on various subject matters related to tactics and strategies that are taught to Police recruits.
- Assisted in the enhancement of the High Risk Building Entry and Search program currently taught to Police recruits at the Ontario Police College.

### ➤ **CANADIAN TACTICAL OFFICERS ASSOCIATION (CTOA)**

- Appointed as the Managing Director of the Canadian Tactical Officers Association.
- Provide training to the Police Tactical and Uniform Patrol community across Canada.
- Media spokesperson for the CTOA. Made numerous interview appearances on various news programs to provide insight on several high profile Police incidents across Canada and Police Use of Force and Tactical training and deployment. Appearances include:
  - CTV News: interviewed on Police shooting incidents, Explosive Forced Entry, and Use of Force training and deployment.
  - Global Television's Investigative news program 16x9: interviewed on training and deployment of the Police Patrol Rifle.

### ➤ **ACTIVE SHOOTER INTERVENTION FOR POLICE**

- Developed a specialized Active Shooter Intervention methodology for Police services. This methodology is based on the Active Shooter/Terror Attack Intervention methodology used by the Israeli Defense Force which I was responsible for enhancing as well as developing several of the tactical applications implemented within the methodology.

This methodology is a court defensible best practices system structured on North American Use of Force policies. I delivered this program to all the Special Forces Units from the United States that attended the IDF Counter Terror School in Israel for training as well as to many Police Services and Units across North America, all of which have either completely replaced their Active Shooter Intervention program with mine or have implemented many of the tactics and strategies from my program into their current Active Shooter protocols.

- To date, trained thousands of Special Forces Soldiers, Police Tactical/SWAT Officers, Uniform Patrol Police Officers, Customs Officers, Tactical and Armed Security Officers, Close Protection Agents/Bodyguards, and Instructors in all those fields from various Countries around the world including Canada, the United States, Israel, and others.
- Appeared on numerous media resources in the capacity of an expert on Terrorism, Use of Force, and other Police, Military and Security related issues. Appearances include:
  - Global News: interviewed on hostage takings, hostage rescue and Police Use of Force training.
  - Discovery Channel: interviewed and provided an in-depth analysis on the terror attacks of September 11/2001 in New York City.
  - CTV News: interviewed on the Beslan School Hostage Crisis in September 2004.

Israeli Defense Force Special Forces Command Counter Terror Unit Operator and Instructor  
Qualification course graduation Diploma presented to Nir Maman, July 2007.

**"מלמד יחי למלחמה ונתת קשת מתושה זרעותי"**  
**(שמאל ב' ל"ב, ל"ה)**

**הצאת למעודה ב"י**

<u>יניב ניר ממון</u>	<u>סמ"ר</u>	<u>[REDACTED]</u>
שם	דרגה	מ.א.

**סיים בהצלחה**

**מסגול מש"ק לוס"ר**

יולי '07

סג"ל [REDACTED]	וס"ן [REDACTED]
מפקד-ביד"ס ולזט"ר-קנ"צ	סגן מפקד-ביד"ס ולזט"ר-קנ"צ

Israeli Defense Force Ground Forces Special Qualifications Command  
Award for Outstanding Service presented to Nir Maman, April 2009.



Israeli Defense Force Ground Forces Infantry and Paratroopers Command  
Award for Outstanding Service presented to Nir Maman, April 2009.



“בחוכמתך ותבונתך עשית לך חיל”  
(יחזקאל כ"ח ד')



מפקדת קצין חי"ר וצנחנים ראשי



# תעודת הצטיינות



מוענקת בזאת

לסמ"ר ממון יניב



על מצויינות, מסירות,



דוגמא אישית



ופועלך בחיל.



תא"ל יוסי בנר  
קצין חי"ר וצנחנים ראשי

22 אפריל 2009  
כ"ח בניסן התשס"ט



## ATLANTIC POLICE ACADEMY

Les Chipperfield, Executive Director  
P.O. Box 156  
Slemon Park, PEI Canada C0B 2A0

Location: 66 Argus Street

Tel: 902 888 6704  
Fax: 902 888 6725

File: 314

July 14, 2004

### RE: Nir Maman - Police Instructor Qualifications

This is to certify that Nir Maman is a Sworn Provincial Police Constable and Instructor with the Atlantic Police Academy, and has been since May 26, 2003.

Mr. Maman is a qualified instructor in the following areas:

**USE OF FORCE:** Defensive Tactics  
Impact Weapons - expandable and straight baton  
Tactical Handcuffing  
O.C. Spray

**FIREARMS:** Basic, advanced, and tactical shooting for;  
Handgun - Glock 17, SIG 226 9mm and 40 caliber  
Sub-machine gun - HK MP-5 9mm  
Assault Rifle - Colt AR-15/M4 Carbine 9mm and 5.56mm  
Shotgun - Remington 870/12 guage

### **TACTICAL OPERATIONS:**

Basic and Advanced Tactical Operations  
Hostage Rescue Operations  
Building containment, assault, entry, and searching  
Critical Intelligence Gathering  
Immediate Rapid Deployment/Active Shooter Intervention  
High-Risk vehicle takedown and High-Risk Subject Arrest

Sincerely,

A handwritten signature in black ink, appearing to read "Les Chipperfield".

Les Chipperfield  
Executive Director

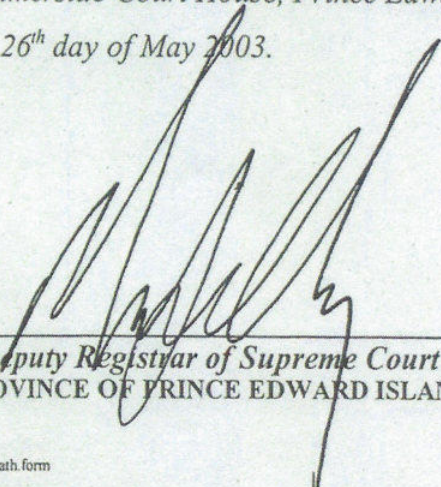


*Atlantic Police Academy*  
*Stemon Park, Prince Edward Island*

*I, Nir Maman, having been appointed a Provincial Police Constable for Prince Edward Island, do swear that I will truly, faithfully, and impartially perform the duties appertaining to the said office according to the best of my skill and ability.*

**SO HELP ME GOD**

**SWORN TO BEFORE ME** *at the*  
*Summerside Court House, Prince Edward Island*  
*the 26<sup>th</sup> day of May 2003.*

  
\_\_\_\_\_  
**Deputy Registrar of Supreme Court**  
**PROVINCE OF PRINCE EDWARD ISLAND**

  
\_\_\_\_\_  
**Signature**

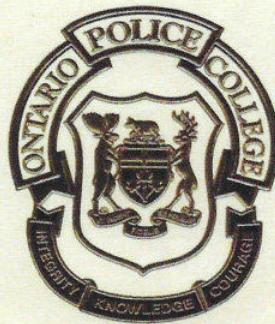
## Paskenta Band of Nomlaki Indians Tribal Police Department

### Oath of Office

*I, do solemnly swear, that I will support the Constitution of the United States, the Constitution and laws of the Paskenta Band of Nomlaki Indians and the Constitution and laws of the State of California, that I will bear true faith and allegiance to the same, and defend them against enemies, foreign and domestic, and that I will faithfully and impartially discharge, the duties of a peace officer, to the best of my ability, so help me God.*

Officer's Printed Name: <i>NIR MAMAN</i>	Officer's Signature: <i>[Signature]</i>
Chief or Deputy Chief's Signature: <i>[Signature]</i> 6-6-14	





THE ONTARIO POLICE COLLEGE WITH APPROVAL OF  
THE MINISTER OF COMMUNITY SAFETY AND CORRECTIONAL SERVICES,

PROVINCE OF ONTARIO,

HAS CONFERRED UPON

*Nir MAMAN*

THE ONTARIO POLICE TRAINING SYSTEM DIPLOMA  
ATTESTING TO SUCCESSFUL COMPLETION OF THE

*USE OF FORCE TRAINER COURSE*

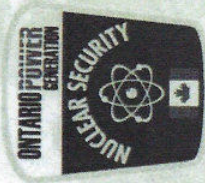
*August 31, 2012*



*W. Stephen*  
A/DIRECTOR - ONTARIO POLICE COLLEGE

**ONTARIOPOWER**  
GENERATION

**CERTIFICATE OF ACHIEVEMENT**  
**NUCLEAR SECURITY RESPONSE TEAM**



This is to Certify that

*Nir Maman*

has successfully completed  
Basic Tactical Orientation Course 1201  
and has obtained the  
Nuclear Response Force Qualification



Paul Nadeau  
Vice President Nuclear Security  
Ontario Power Generation

April 26, 2012



**DEPARTMENT OF THE ARMY**  
D COMPANY, 2<sup>d</sup> BATTALION, 1<sup>st</sup> SPECIAL WARFARE TRAINING GROUP (AIRBORNE)  
UNITED STATES ARMY JOHN F. KENNEDY SPECIAL WARFARE CENTER AND SCHOOL  
FORT BRAGG, NC 28310-5000

AOJK-GPB-SD

14 May 2009

MEMORANDUM FOR RECORD

SUBJECT: Letter of Recommendation for SGM Nir Maman  
(Israeli Defense Force, Special Forces Counter-Terror  
and Special Operations School Section Commander and  
Counter-Terror Warfare Instructor)

1. In Mar of 2009 I attended a Small Unit Exchange with the IDF CT School at Camp Adam Israel. My counterpart was SGM Nir Maman. He was able to clearly articulate training methodology and mindset of the Israeli CT Operator. More importantly he was able to clarify why certain techniques were developed to combat terrorists in the 21<sup>st</sup> century. His hands on training approach was easy, straight forward, and made learning new techniques in a condensed time period effective.
2. SGM Nir Maman's explanation and practical application of the active shooter protocols were dynamic and enlightening. This technique and methodology has been adopted by many top tier counter terrorist organizations and law enforcement elements around the world. I would recommend that any organization that may be faced with a terrorist threat needs to learn this mindset and more importantly how to apply the dynamic techniques necessary to win in an active shooter scenario. Even for the most experienced CT Operator his explanation and methodology was truly enlightening and a good reminder of the basics that are often overlooked by advanced Operators.
3. SGM Nir Maman's Krav Maga combative training was the best I have seen in the last 27 years I have served in Special Forces. Typically the Krav Maga demonstrated at Dojos in the US are watered down, mixed disciplines, or very modified versions of the Krav Maga System. The IDF CT version Krav Maga that Nir taught was simple to comprehend, simple to exercise and perform, and most importantly taught the Operator proper combat fighting mindset to deal with relevant fighting scenarios.



**DEPARTMENT OF THE ARMY**  
D COMPANY, 2<sup>d</sup> BATTALION, 1<sup>st</sup> SPECIAL WARFARE TRAINING GROUP (AIRBORNE)  
UNITED STATES ARMY JOHN F. KENNEDY SPECIAL WARFARE CENTER AND SCHOOL  
FORT BRAGG, NC 28310-5000

SUBJECT: Letter of Recommendation for SGM Nir Maman  
(Israeli Defense Force, Special Forces Counter-Terror  
and Special Operations School Section Commander and  
Counter-Terror Warfare Instructor)

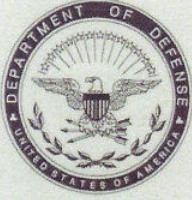
4. SGM Nir Maman's Hostage Rescue CQB training starts with active shooter protocols and culminates with detailed plans to execute HR Mission profiles which was absolutely spot on tactics to limit threat reaction time and allow a dominate exchange of control from terrorist to rescuer.

5. I recommend that any Top Tier Military or Law Enforcement unit schedule Nir at the earliest opportunity to train his techniques. It will serve as an eye opener to the most experienced Operators and will enlarge the tool box from which Operators draw from to overwhelm a threat and save lives.

6. Questions pertaining to this recommendation should be addressed to the undersigned at 910-432-9771 or [gouldp@soc.mil](mailto:gouldp@soc.mil), [peter.a.gould@us.army.mil](mailto:peter.a.gould@us.army.mil).

A handwritten signature in cursive script, appearing to read "Peter A. Gould".

PETER A. GOULD  
SGM USA  
Company Sergeant Major



**UNITED STATES MARINE CORPS**  
HEADQUARTERS AND HEADQUARTERS SQUADRON  
MARINE CORPS AIR STATION IWAKUNI, JAPAN  
PSC 561 BOX 1862  
FPO AP 96310-0019

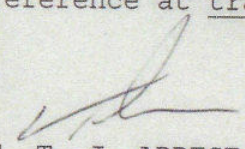
IN REPLY REFER TO:  
12000  
HADM  
8 Dec 09

From: Commanding Officer, Headquarters and Headquarters Squadron  
To: Whom It May Concern

Subj: **ACTIVE SHOOTER INTERVENTION TRAINING**

1. It is with great privilege that I write to you in recommendation of Active Shooter Intervention Training held by Mr. Nir Maman. The training we received here at Marine Corps Air Station Iwakuni, Japan was far beyond expectations. Mr. Maman and his associate came to the location and gave lasting and meaningful training that benefited all that were involved. The class was professional; the shooting at the range was conducted safely and was very meaningful in results. The class focused on an "active shooter". The class taught how to dispatch shooters in a time sensitive manor while stopping or minimizing civilian losses. This class can be tailored to the expert in the field or to the less experienced warriors.

2. I would highly recommend Active Shooter Training held by Mr. Maman. As a combat veteran, I know what it takes to stay alive. This training saves lives and is a must for any unit about to deploy to a combat zone. If you have any question concerning the training, I can be used as a reference at [tray.ardese@usmc.mil](mailto:tray.ardese@usmc.mil) or DSN 253-4670.

  
Lt. Col. T. J. ARDESE



**U.S. DEPARTMENT OF JUSTICE**  
**Federal Bureau of Investigations**

July 8, 2014

Re Nir Maman

To whom it may concern,

I am writing this letter of recommendation supporting Nir Maman's application for a Special Skills Visa. I came into contact with Mr. Maman when he was contracted to provide a Counter Terror/Active Shooter Response, Train the Trainer Course for the Federal Bureau of Investigation (FBI) Newark Division SWAT Team. Mr. Maman's training is cutting edge and I do not believe available anywhere else in the United States.

I have been a Special Agent of the FBI for the past 24 years, and have been a member of the FBI's SWAT program from 1996 to the present. I served as the SWAT Senior Team Leader (STL) for the Newark Division from 2003 until 2011 when I received a transfer to the Jacksonville Division where I am currently the STL for that team. I have attended many active shooter response schools. It is a testament to Mr. Maman that of all the training I have received, I believe his methods are the most practical and beneficial to responding law enforcement.

In today's law enforcement environment the tactical expertise which Mr. Maman possesses and shares is a rare commodity. Accordingly, it is without reservation that I recommend Nir Maman for the issuance of a Special Skills Visa.

Please note that the applicable Government Standards of Conduct require me to advise you that the information provided in this letter of recommendation is based solely on my personal knowledge of Mr. Maman and should not be construed as the official view of the FBI.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Raymond F. Lovett", is written over a horizontal line.

Raymond F. Lovett  
SWAT Senior Team Leader  
FBI, Jacksonville



*Toronto Police Service*  
**INTERNATIONAL POLICE OPERATIONS**

**CERTIFICATE OF APPRECIATION**

**NIR MAMAN**

**FOR YOUR INSTUCTION ON RECOGNITION OF EXPLOSIVES AND  
SUICIDE BOMBERS DURING THE TORONTO POLICE SERVICE  
INTERNATIONAL POLICE OPERATIONS DEPLOYMENT TRAINING**

**2012 APRIL CLASS**

A handwritten signature in blue ink, appearing to read "Bill Vollmar".

P.C. BILL VOLLMAR #8428  
TPS IPO COORDINATOR



Federal Law Enforcement Training Center  
U. S. Department of Homeland Security  
1131 Chapel Crossing Road  
Glynco, Georgia 31524

To: Nir Maman

From: Richard A. Scott  
Senior Instructor EOD/TAB

Date: June 15, 2009



Homeland  
Security

Subject: Terror Attack Active Shooter Immediate Intervention Course

Dear Nir,

I would like to take this time to offer thanks for the outstanding course you provided us on Terror Attack / Active Shooter Immediate Intervention. It was one of the most intense courses I have ever attended and proved to be worth every moment.

This course presented key elements necessary to saving lives during an Active Shooter attack that are presently missing in the Law Enforcement community. As well, this course taught the necessary mindset and tactics to help Police Officers drastically enhance their chances for surviving a deadly force encounter with an active threat.

Your unsurpassed professionalism and integrity in training was unwavering throughout the duration of this course and your level of instruction was excellent.

Specialists of your high caliber are rare. Your level of real world experience became readily apparent to all in attendance. You demonstrated an intricate understanding of the threat an Active Shooter truly poses to society.

Because of the way your training is implemented and the rare knowledge you bring to the table it should be expected that you will continue to "set the standard" for the Law Enforcement training community.

I have no loss for words when speaking to others when it comes to the quality, effectiveness, and reliability regarding your training.

Thank you again for the fantastic training experience.

//Signed

Richard A. Scott  
Senior Instructor, Enforcement Operations Division EOD/TAB  
Federal Law Enforcement Training Center  
(912) 267-2100



State of New Jersey  
OFFICE OF THE ATTORNEY GENERAL  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF STATE POLICE  
POST OFFICE BOX 7068  
WEST TRENTON NJ 08628-0068  
(609) 882-2000

JON S. CORZINE  
Governor

ANNE MILGRAM  
Attorney General

COLONEL JOSEPH R. FUENTES  
Superintendent

February 18, 2008

Mr. Nir Maman  
Krav Maga Israel, LLC  
127 Route 206, Unit 9  
Hamilton, NJ. 08610

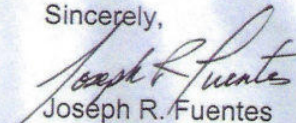
Dear Mr. Maman:

On behalf of the New Jersey State Police, I want to extend my personal gratitude to you for providing my academy staff with the exceptional Israeli Counter Terror and Rapid Deployment Tactics Course. This highly effective course of instruction was held at the Mercer County Range, Mercer County, New Jersey, from September 10-12, 2007, and allowed the New Jersey State Police to take part in training that will further enhance our current firearms capabilities.

It is important that our tactics continually evolve so our members are prepared to support modern law enforcement's mission to provide homeland and hometown protection to the citizens of this state. The Israeli Tactical Shooting system is a cutting edge, best practices training course that's geared towards ending hostile confrontations in a quick and efficient manner that limits collateral damage to innocent bystanders and police.

The division and the academy staff look forward to continuing this partnership and working with you in the future.

Sincerely,

  
Joseph R. Fuentes  
Colonel  
Superintendent

mm



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Detective Steven E. Hayden  
New York City Police Department – Emergency Service Unit

August 01, 2011

**RE: Active Shooter Intervention training by Nir Maman**

To whom it may concern;

This letter reflects upon the Active Shooter Intervention training for police conducted by Nir Maman. I am currently a tactical instructor for the N.Y.P.D. Emergency Service Unit with over 20 years of active law enforcement duty including patrol and tactical operations, in addition I am a veteran of the United States Military Special Forces with operational tours in Afghanistan. I have attended this course conducted by Nir Maman on two occasions. This training presented Israeli law enforcement/military response to active shooter incidents and presented several elements currently missing in the North American Law Enforcement community in relation to addressing this threat. I will attempt to compare its techniques, tactics and procedures to the current trends in North American Law Enforcement regarding response to the same.

The overwhelming response to the question of how to handle an active shooter situation by North American Law Enforcement is to form a team at the location of the incident and clear the target with the use of tactical formations and systematic searches. This approach is driven by the concept of Officer Safety, not the concept of the fastest possible mitigation of the incident in order to save the greatest number of innocent lives. The most critical element of an incident of this nature is **TIME**, the longer it takes to locate and engage the shooter, the greater the loss of life. Being a Police Officer is a dangerous profession, that said, the individual Officer has a duty to act to save innocent life without delay and if alone without backup. To wait at the scene of an active shooter as gun fire falls defenseless unarmed innocent civilians is unforgiveable, it would be a decision that Officer will be haunted by for the rest of their life. The armed responder is the only instrument that can stop the killing; it is imperative that the response is immediate and committed to ending the incident. The concept of the police being out gunned is the response of the timid, are you not better equipped to fight a gunman than the unarmed victims that fall before them? Your safety cannot be allowed to be the main consideration in your response to this type of incident; you must get in the fight and save those who cannot save themselves.

The Israeli response to an Active Shooter incident is swift and committed, their tactics and techniques have been forged in blood. As a society, Israel has experienced the greatest number of active shooter incidents the world over, they have learned what they practice at the cost of human life. The methodology taught by Nir Maman are the current most evolved tactics used to combat the Active Shooter in Israel; they are designed to save the maximum number of innocent lives while enhancing the officer's ability to mitigate threats in a complex and stressful operating environment.

This methodology reverse engineers the response structure used in North America and delivers a far more effective end result. In North America, although the spoken rule amongst the Law Enforcement community is 'the Officer will engage the situation on their own if need be', there is no safe methodology designed for single Officer response and in addition SOP's still dictate multiple Officer response and formations. The use of multiple Officers and formations is a perception of elevated safety and effectiveness, however Nir's course quickly exposes the weaknesses of this thinking that counter acts the objectives of both saving innocent lives and Officer safety.

Any type of formation work (for as little as two Officer teams up to larger teams) will only be effective in a controlled environment. An Active Shooter environment is the most uncontrolled environment that exists and will lend itself to issues such as tactical disconnect between formed up Officers. Not only will any type of a formation automatically slow down the response initiative (as real time assessment based information has to transfer through the team nucleus which must adapt collectively on an ongoing basis), but if the formation is disrupted in any way (such as an Officer down predicament) the entire formation comes to a halt until it re-collects, re-establishes individual task control within the team, and then proceeds. Even if the delay is mere seconds, that is a potential for more executed victims.

The Israeli methodology begins with single Officer response tactics and strategies which become the foundation for a multiple Officer team where any additional Officers blend seamlessly into the dynamic. This innovated platform automatically solves two issues. First it provides the most effective approach for single Officer response, it allows for an effective deployment of a single Officer should the severity of the circumstances call for it. Second, it allows for a more effective 'team' operation in an uncontrolled environment. Should the formation encounter a disconnect of any sort (such as an Officer down) the single Officer based team dynamic is not hindered in any way nor is it delayed.

In addition, I found this methodology to provide a much more tactically sound and safer outcome for Officers responding to a situation where they may encounter multiple dedicated, skilled, and hostile threats. The tactics used are simple and direct, complicated plans and techniques tend to fail under the stress of actual combat. This methodology does not deviate at all from the responsibility of the North American Law Enforcement community, it conforms fully to the policies and legal requirements of Use of Force criteria and litigation.

The Israeli response to Active Shooter Incidents is a fast, effective and tested best practices system. Any Police Department would do well to learn this methodology and its tactics and put them into practice, train for your next fight, it will come.

Nir Maman is a committed teacher and professional. As an instructor, Nir is polished and engaging, the intensity, experience, and knowledge he brings to his teaching is refreshing. The methodology and tactics are easily learned and retained with practice; the most important element is the mental attitude and mind set instilled into the individual Officer in this training. The current situation in North America calls for an absolute commitment by Law Enforcement to prepare to fight our enemy in our streets, schools and work places with the dedication and focus to win at all costs.

Sincerely,

//signed//

Detective Steven E. Hayden  
New York City Police Department  
Emergency Service Unit  
Tactical Training Section

# Western Chester County Emergency Response Team

Downington Police  
Chief James McGowan III

Caln. Twp. Police  
Chief Brian Byerly

Brandywine Regional Police  
Chief Mark Kocsi

East Fallowfield Police  
Chief Peter J. Mango



West Brandywine Police  
Chief Walter Werner

Coatesville Police  
Chief J. Canale

Parkesburg Police  
Chief Brian Sheller

February 28/2011

To: Nir Maman  
CT 707 - Israeli Krav Systems Inc.

RE: Dynamic Response Counter Ambush Shooting, Active Shooter Intervention,  
and Secure Search Training.

Mr. Maman,

I wanted to express my gratitude for offering the Active Shooter Intervention, Dynamic Response Shooting, and Secure Search training on February 23-24, 2011 in Hamilton New Jersey hosted by the Mercer County Police Academy. You are by far one of the best instructors I have had the privilege from which to learn. Your knowledge of armed and unarmed combat is astounding. All the material was presented in a clear and concise manner.

Your methodology in the world of counter terrorism and tactics should be standard training for all those in public service. My training philosophies will certainly change from this point on. I believe that your training will have a serious positive impact on our abilities to deal with Active Shooter incidents. What I found equally as valuable was your operational experience in this subject matter. It is one thing to train based on principles handed down from your predecessors, but in this case you are at the tip of the spear. Your basis for the tactics and information taught is from real world experience in one of the world's most violent places. As an instructor I can say that we would be doing a great disservice to those we are charged to train if we did not take your subject matter expertise to heart.

I thank you, Nir Maman, for your dedication and professionalism. The training was a turning point for me and those in my charge. You have clearly made an impact on our agency that will most likely result in saving lives.

Respectfully,

//Signed//

Sgt. Kevin Bernard  
Caln Township Police Department  
Team Leader for WCC Emergency Response Team  
(610) 383-1821 ext. 128

UNITED STATES MARSHALS SERVICE

# CERTIFICATE of APPRECIATION



Presented to

Instructor Nir Maman

*For your contributions to the mission of the United States Marshals Service  
Israeli Tactical Shooting Immediate Rapid Deployment and Counter-Terror Engagements  
September 7, 2007*

Honorable James T. Plousis  
United States Marshal

October 17, 2007

Date

CONSULATE GENERAL OF ISRAEL  
TORONTO

180 BLOOR ST. WEST, SUITE 700  
TORONTO, ONTARIO M5S 2V6  
Telephone: (416) 640-8500  
Fax: (416) 640-8555  
Website: <http://toronto.mfa.gov.il>



הקונסוליה הכללית של ישראל  
טורונטו

June 14, 2010

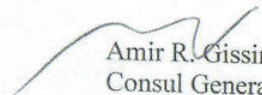
Mr. Nir Maman  
International Defense Force  
800 Steeles Avenue West  
Unit B-10, Suite 178  
Thornhill, ON L4J 7L2

Dear Mr. Maman,

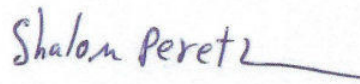
On behalf of the Consulate General of Israel, I would like to express our sincere thanks for your assistance during Prime Minister Benjamin Netanyahu's recent visit. As you may be aware, this was the first visit to Toronto by an Israeli Prime Minister in 32 years, and we were very proud that he came here and addressed this year's Walk for Israel rally.

However, such a visit requires a great deal of planning and attention to security matters. It would not have been possible without the expertise and dedication of professionals like yourself who helped to ensure its success. For this, we are most grateful, and once again convey our thanks for all your efforts.

Sincerely,

  
Amir R. Gissin  
Consul General

Sincerely,

  
Shalom Peretz  
Head of Security

In November 2008 the Israeli Defense Force's Counter-Terror Unit and Counter-Terror and Special Operations School (Unit 707), was featured in Special Operations Report Magazine. This magazine is a closed publication exclusive to the Global Military and Police Special Operations Community. Sergeant-Major Nir Maman shown on the cover of the issue (on the right in the standing position) was selected to be the spokesperson and representative of the unit for the feature.



SPECIAL OPERATIONS REPORT

ISRAEL: INP UNIT 33 • IDF LOTAR NYPD PC RAY KELLY FRENCH CPA 20 SAN DIEGO SWAT

VOLUME 17

# SPECIAL OPERATIONS REPORT

INSIDE THE WORLD OF  
POLICE AND MILITARY  
TACTICAL UNITS

## Spotlight: Israeli Counterterrorism

- INP Unit 33 Special Intelligence Unit
- IDF LOTAR CT School

## Commander's Briefing

NYPD Commissioner Ray Kelly

## French Parajumpers

Commandos of CPA 20

## The Thin Black Line

San Diego Police SWAT



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VOLUME 17  
SPECIALOPERATIONSREPORT.COM

# **Exhibit B**

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Email: *ngelhaar@enensteinlaw.com*

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5 **ENENSTEIN PHAM & GLASS**

12121 Wilshire Boulevard, Suite 600

7 Los Angeles, California 90025

8 Tel.: (310) 899-2070

9 Fax: (310) 496-1930

Attorneys for Plaintiff STEPHEN RUSSELL

10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12 **STEPHEN RUSSELL**, an individual,

Case No. 4:18-cv-06691-RS

13 Plaintiffs,

**PLAINTIFF STEPHEN RUSSELL'S  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS, SET ONE TO NIR  
MAMAN**

14 vs.

16 **NIR MAMAN**, an individual; **CT707**

17 **ISRAELI KRAV SYSTEMS, INC.**,

18 an Ontario corporation; **GEORGE**

19 **AKKELQUIST**, an individual; **DFW**

**METROPLEX TRAINING**

20 **ACADEMY**, a New York entity form

unknown, and **DOES 1 through 20**,

21 inclusive,

22 Defendants.

1 **PROPOUNDING PARTY: Plaintiff STEPHEN RUSSELL**

2 **RESPONDING PARTY: Defendant, NIR MAMAN**

3 **SET: ONE (1)**

4 Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff Stephen  
5 Russell, ("Russell") hereby requests that Defendant, Nir Maman ("Maman") identify  
6 and produce the originals or best available copies of the writings and other things  
7 described below for inspection and copying within the time and in the manner  
8 prescribed by the Federal Rules of Civil Procedure. The place for inspection shall  
9 be the law offices of Eenstein Pham & Glass, 12121 Wilshire Boulevard, Suite 600,  
10 Los Angeles, California 90025.

11 **DEFINITIONS**

12 1. "YOU," "YOUR," or "MAMAN" means Defendant NIR MAMAN and  
13 any or all of his agents and/or representatives.

14 2. "RUSSELL" means STEPHEN RUSSELL, and any or all of his agents  
15 and/or representatives.

16 3. "COMMUNICATION(S)" means any form of communication or  
17 correspondence whether oral or written between one or more persons, including but  
18 not limited to, letters, memoranda, cards, circulars, bulletins, dispatches,  
19 notifications emails, text messages, recordings of oral conversations blog posts,  
20 information transmitted through social network websites whether produced,  
21 reproduced or stored USB disk drives, data cells or other media or data compilation  
22 from which information can be obtained, including originals, copies (with or without  
23 notes or changes thereon) and drafts, including, but not limited to, papers, books,  
24 letters, tangible things, correspondence, telegrams, cables, telex messages,  
25 memoranda, notes, notations, work papers, transcripts, minutes, reports, recordings  
26 of telephone conversations, or interviews or of conferences, or other meetings,  
27 affidavits, statements, summaries, opinions, reports, studies, work sheets, proposals,  
28 contracts, agreements, statistical records, desk calendars, appointment books,

1 diaries, lists, tabulations, sound recordings, computer printouts, data processing  
2 output and input, microfilms, photographs or negatives thereof, all other records kept  
3 by electronic, photographic or mechanical means, and any or all matter or material  
4 attached or affixed to any of the above.

5 4. "DOCUMENT(S)" means any handwriting, typewriting, printing,  
6 photostating, photographing, photocopying, transmitting by electronic mail or  
7 facsimile, and every other means of recording upon any tangible thing any form of  
8 communication or representation, including letters, words, pictures, sounds, or  
9 symbols, or combinations thereof, and any record thereby created, regardless of the  
10 manner in which the record has been stored.

11 5. "REFER(S)", "RELATED TO," "RELATES TO," "RELATING TO"  
12 or "RELATE TO" means to constitute, embody, identify, evidence, reflect, record,  
13 show, memorialize, consist of, discuss, describe, mention, concern, consider,  
14 evaluate, review, analyze, report on, support, or bear upon the subject matter of the  
15 request.

16 6. "AKKELQUIST" means named Defendant George Akkelquist.

17 7. "RELEVANT TIME PERIOD" means January 1, 2017 to the present.

18 8. "ENTITY" means any organization, company, and/or corporation,  
19 including any government, public, and/or private organization.

20 9. "SECURITY SERVICES" means any services provided to RUSSELL  
21 RELATED to security, protection, cyber-security, surveillance, counter-  
22 surveillance, threat risk assessment and mitigation, infrastructure and disruptive  
23 environment protection, investigation, intelligence, and/or counter intelligence  
24 services.

25 ///

26 ///

27 ///

**INSTRUCTIONS**

1  
2 1. This Request for Production covers all responsive  
3 COMMUNICATIONS and DOCUMENTS in your possession, custody or control,  
4 including COMMUNICATIONS and DOCUMENTS that are in the possession,  
5 custody or control of your agents or representatives, unless privileged or exempted  
6 from production under federal law.

7 2. For each written response:

8 a. Produce responsive COMMUNICATIONS and DOCUMENTS;

9 b. Produce all electronically stored COMMUNICATIONS and  
10 DOCUMENTS in both hard copy and native format;

11 c. State whether you have produced all responsive  
12 COMMUNICATIONS and DOCUMENTS;

13 d. State all objections to any request with specificity, and if the event  
14 an objection relates only to a part or portion of a request, specify the part or portion  
15 of the response objected to and state whether you have produced or intend to permit  
16 inspection and copying of the remaining parts or portions; and;

17 e. Organize all COMMUNICATIONS and DOCUMENTS and  
18 things produced for inspection, by among other things, labeling the  
19 COMMUNICATIONS and DOCUMENTS and categorizing them to correspond to  
20 the Requests.

21 3. In the event that any COMMUNICATION or DOCUMENT or other  
22 thing called for by any request has been destroyed, discarded, or otherwise disposed  
23 of, that COMMUNICATION or DOCUMENT or other thing is to be identified as  
24 completely as possible, and the following information is to be provided: date of  
25 disposal, manner of disposal, reason for disposal, person authorizing the disposal,  
26 and person disposing of the document or other thing.

27 4. If you claim that the attorney-client privilege or the attorney work-  
28 product doctrine is applicable to any responsive COMMUNICATION or

1 DOCUMENT, then you shall state with respect to that COMMUNICATION or  
2 DOCUMENT:

3 a. The reason for withholding the COMMUNICATION or  
4 DOCUMENT;

5 b. The date the COMMUNICATION or DOCUMENT was created;

6 c. The identity of the COMMUNICATION or DOCUMENT'S  
7 author, including employment title and description, current address, and telephone  
8 number;

9 d. The identity of each person to whom the COMMUNICATION  
10 or DOCUMENT was sent, including employment title and description, current  
11 address, and telephone number;

12 e. The custodian of the COMMUNICATION or DOCUMENT,  
13 including employment title and description, current address, and telephone number;  
14 and

15 f. A description of the COMMUNICATION or DOCUMENT  
16 sufficient to permit Plaintiff and the Arbitrators to assess the validity of any  
17 privilege, immunity, or exemption asserted.

18 5. This Request for Production is continuous in nature. If you discover  
19 additional documents called for by this Request, then promptly amend and  
20 supplement your responses and production.

21 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

22 **REQUEST FOR PRODUCTION NO. 1**

23 All DOCUMENTS RELATING to MAMAN'S introduction to RUSSELL.

24 **REQUEST FOR PRODUCTION NO. 2**

25 All DOCUMENTS RELATING to MAMAN'S COMMUNICATIONS with  
26 RUSSELL at any time from his introduction to RUSSELL to the present.

27 ///

1 **REQUEST FOR PRODUCTION NO. 3**

2 All DOCUMENTS RELATING to the SECURITY SERVICES provided by  
3 MAMAN to RUSSELL during the RELEVANT TIME PERIOD.

4 **REQUEST FOR PRODUCTION NO. 4**

5 All COMMUNICATIONS RELATING to the SECURITY SERVICES  
6 provided by MAMAN to RUSSELL during the RELEVANT TIME PERIOD.

7 **REQUEST FOR PRODUCTION NO. 5**

8 All DOCUMENTS evidencing and/or RELATING to an accounting of all  
9 SECURITY SERVICES provided by MAMAN to RUSSELL during the  
10 RELEVANT TIME PERIOD.

11 **REQUEST FOR PRODUCTION NO. 6**

12 All DOCUMENTS evidencing and/or RELATING to any contracts between  
13 MAMAN and RUSSELL.

14 **REQUEST FOR PRODUCTION NO. 7**

15 All COMMUNICATIONS RELATING to and/or referencing RUSSELL  
16 from the RELEVANT TIME PERIOD.

17 **REQUEST FOR PRODUCTION NO. 8**

18 All DOCUMENTS RELATING to any payments requested from RUSSELL  
19 by MAMAN from the RELEVANT TIME PERIOD.

20 **REQUEST FOR PRODUCTION NO. 9**

21 All DOCUMENTS RELATING to any monies paid by RUSSELL to  
22 MAMAN from the RELEVANT TIME PERIOD.

23 **REQUEST FOR PRODUCTION NO. 10**

24 All COMMUNICATIONS to any subcontractors retained by YOU to provide  
25 SECURITY SERVICES to RUSSELL from the RELEVANT TIME PERIOD.

26 ///

27 ///

28

1 **REQUEST FOR PRODUCTION NO. 11**

2 All DOCUMENTS RELATING to any payments made to third parties to  
3 provide SECURITY SERVICES to RUSSELL from the RELEVANT TIME  
4 PERIOD.

5 **REQUEST FOR PRODUCTION NO. 12**

6 All COMMUNICATIONS between MAMAN and RUSSELL from the  
7 RELEVANT TIME PERIOD.

8 **REQUEST FOR PRODUCTION NO. 13**

9 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
10 to RUSELL of any threats against RUSSELL.

11 **REQUEST FOR PRODUCTION NO. 14**

12 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
13 that RUSSELL was in danger.

14 **REQUEST FOR PRODUCTION NO. 15**

15 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
16 that there were threats to RUSSELL's safety.

17 **REQUEST FOR PRODUCTION NO. 16**

18 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
19 of threats against the safety of RUSSELL'S family.

20 **REQUEST FOR PRODUCTION NO. 17**

21 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
22 that RUSSELL's family was in danger.

23 **REQUEST FOR PRODUCTION NO. 18**

24 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
25 that there were threats against RUSSELL'S business interests.

26 **REQUEST FOR PRODUCTION NO. 19**

27 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
28 that RUSSELL's business interests were in danger.

1 **REQUEST FOR PRODUCTION NO. 20**

2 All COMMUNICATIONS between MAMAN and RUSSELL's security  
3 personnel from the RELEVANT TIME PERIOD.

4 **REQUEST FOR PRODUCTION NO. 21**

5 All COMMUNICATIONS between MAMAN and AKKELQUIST  
6 REFERRING to RUSSELL.

7 **REQUEST FOR PRODUCTION NO. 22**

8 MAMAN's license from the California Bureau of Security and Investigative  
9 Services.

10 **REQUEST FOR PRODUCTION NO. 23**

11 All DOCUMENTS evidencing and/or RELATING to any license of  
12 MAMAN to provide security services.

13 **REQUEST FOR PRODUCTION NO. 24**

14 All DOCUMENTS evidencing and/or RELATING to any license of  
15 MAMAN to provide investigative services.

16 **REQUEST FOR PRODUCTION NO. 25**

17 All DOCUMENTS evidencing and/or RELATING to any certification of  
18 MAMAN in Krav Maga.

19 **REQUEST FOR PRODUCTION NO. 26**

20 All DOCUMENTS evidencing and/or RELATING to MAMAN's experience  
21 in Krav Maga.

22 **REQUEST FOR PRODUCTION NO. 27**

23 All DOCUMENTS evidencing and/or RELATING to MAMAN's  
24 representations that there was ongoing unwanted surveillance of RUSSELL by third  
25 parties.

26 **REQUEST FOR PRODUCTION NO. 28**

27 All DOCUMENTS evidencing and/or RELATING to MAMAN's  
28 representations of government investigations of RUSSELL.

1 **REQUEST FOR PRODUCTION NO. 29**

2 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
3 that individuals had active hits out for RUSSELL'S life.

4 **REQUEST FOR PRODUCTION NO. 30**

5 All DOCUMENTS evidencing and/or RELATING to the approximate \$5.4  
6 million dollar security budget requested by MAMAN.

7 **REQUEST FOR PRODUCTION NO. 31**

8 All DOCUMENTS evidencing and/or RELATING to whom/where payments  
9 made by RUSSELL were used towards the SECURITY SERVICES.

10 **REQUEST FOR PRODUCTION NO. 32**

11 All DOCUMENTS evidencing and/or RELATING to MAMAN'S Israeli  
12 Defense Force / Ministry of Defense Level 3 Top Secret Clearance as stated on  
13 MAMAN'S Curriculum Vitae (attached hereto as EXHIBIT 1).

14 **REQUEST FOR PRODUCTION NO. 33**

15 All DOCUMENTS evidencing and/or RELATING to MAMAN'S  
16 Government of Canada Level 2 Secret Clearance, as stated on MAMAN'S  
17 Curriculum Vitae (attached hereto as EXHIBIT 1).

18 **REQUEST FOR PRODUCTION NO. 34**

19 All DOCUMENTS evidencing and/or RELATING to MAMAN'S  
20 experience, as stated on MAMAN'S Curriculum Vitae (attached hereto as EXHIBIT  
21 1)

22 **REQUEST FOR PRODUCTION NO. 35**

23 All DOCUMENTS RELATING to MAMAN's representations to RUSSELL  
24 that MAMAN was actively serving on an Israeli intelligence unit during the  
25 RELEVANT TIME PERIOD.

26 **REQUEST FOR PRODUCTION NO. 36**

27 All DOCUMENTS evidencing and/or RELATING to MAMAN's service in  
28 the Central Command Counter-Terror Unit.

1 **REQUEST FOR PRODUCTION NO. 37**

2 All DOCUMENTS evidencing and/or RELATING to MAMAN's service in  
3 the Special Forces Counter-Terror and Special Operations School.

4 **REQUEST FOR PRODUCTION NO. 38**

5 All DOCUMENTS evidencing and/or RELATING to MAMAN's position as  
6 Commander in the Central Command Counter-Terror Unit.

7 **REQUEST FOR PRODUCTION NO. 39**

8 All DOCUMENTS evidencing and/or RELATING to MAMAN's position as  
9 a high-ranking officer of the Mossad.

10 **REQUEST FOR PRODUCTION NO. 40**

11 All DOCUMENTS evidencing and/or RELATING to MAMAN's position as  
12 an officer of the Toronto Police Department.

13 **REQUEST FOR PRODUCTION NO. 41**

14 All DOCUMENTS evidencing and/or RELATING to MAMAN's position as  
15 the Lead Counter-Terror Instructor on the Counter-Terror School's Designated  
16 Hostage Rescue Take-Over Units Instruction Section.

17 **REQUEST FOR PRODUCTION NO. 42**

18 All DOCUMENTS evidencing and/or RELATING to MAMAN's assignment  
19 to the Chief Instruction and Research Development Section of the Special Forces  
20 Counter-Terror and Special Operations School.

21 **REQUEST FOR PRODUCTION NO. 43**

22 All DOCUMENTS evidencing and/or RELATING to MAMAN's  
23 appointment as the Counter Terror School's Subject Matter Expert on Active  
24 Shooter Intervention.

25 **REQUEST FOR PRODUCTION NO. 44**

26 All DOCUMENTS evidencing and/or RELATING to MAMAN's position as  
27 an Operational Team Leader on the Counter-Terror Unit during high-risk  
28 deployments in the West Bank and Gaza Strip regions.

1 **REQUEST FOR PRODUCTION NO. 45**

2 All DOCUMENTS evidencing and/or RELATING to MAMAN receiving the  
3 Soldier of the Year Award of Excellence by the Israeli Defense Force Ground Forces  
4 Command and Israeli Defense Force Special Qualifications Command.

5 **REQUEST FOR PRODUCTION NO. 46**

6 All DOCUMENTS evidencing and/or RELATING to MAMAN's position as  
7 a certified Provincial Use of Force Instructor through the Ontario Police College.

8 **REQUEST FOR PRODUCTION NO. 47**

9 All DOCUMENTS evidencing and/or RELATING to MAMAN's position as  
10 a sworn Police Constable Use of Force Instructor through the Atlantic Police  
11 Academy in Prince Edward Island Canada.

12 **REQUEST FOR PRODUCTION NO. 48**

13 All DOCUMENTS evidencing and/or RELATING to MAMAN's position as  
14 an operational member on a Nuclear Tactical Unit for the Government of Canada.

15 **REQUEST FOR PRODUCTION NO. 49**

16 All DOCUMENTS evidencing and/or RELATING to MAMAN's position as  
17 a Sworn Police Officer Tactical Advisor for any Tribal Police Department in  
18 California.

19 **REQUEST FOR PRODUCTION NO. 50**

20 All DOCUMENTS RELATING to any allegations of misconduct by  
21 MAMAN from any ENTITY.

22 **REQUEST FOR PRODUCTION NO. 51**

23 All DOCUMENTS RELATING to any disciplinary action taken against  
24 MAMAN by any ENTITY.

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26 ///

27 ///

1 **REQUEST FOR PRODUCTION NO. 52**

2 All DOCUMENTS RELATING to any investigations into MAMAN for  
3 misconduct by any ENTITY.

4  
5 DATE: January 17, 2018

ENENSTEIN PHAM & GLASS

6 BY:

7 /s/ Ned M. Gelhaar

8 Darren S. Enenstein, Esq.

9 Ned M. Gelhaar Esq.

10 Joy D. Llaguno, Esq.

11 Attorneys for Plaintiff

12 Stephen Russell  
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**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is: 12121 Wilshire Boulevard, Suite 600, Los Angeles, California 90025.

On January 17, 2019, I served the foregoing document(s) entitled: **PLAINTIFF STEPHEN RUSSELL'S REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE TO NIR MAMAN**, on the following interested party/ies:

ROD DIVELBISS  
JRA LAW PARTNERS, LLP  
450 Pacific Avenue, Suite 200  
San Francisco, CA 94133

DEK KETCHUM  
LAW OFFICES OF DEK KETCHUM  
900 Veterans Boulevard, Suite 600  
Redwood City, California 94063

*Attorneys for Defendants  
NIR MAMAN and CT707 ISRAELI  
KRAV SYSTEMS, INC.*

*Attorneys for Defendants  
GEORGE AKKELQUIST and DFW  
METROPLEX TRAINING ACADEMY*

**[X] BY PERSONAL SERVICE:** Placing the document(s) listed above in a sealed envelope(s) and by causing personal delivery of the envelope(s) to the person(s) at the address(es) set forth above.

I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed this 17th day of January, 2019, in Los Angeles County, California.

/s/ Omar Rodriguez  
OMAR RODRIGUEZ

# EXHIBIT "1"

# **NIR MAMAN**

## ***CURRICULUM VITAE***

**- Confidential -**

**This document contains sensitive information and is  
intended for addressee only.**

## CURRICULUM VITAE

**NAME:** Nir Maman

**ADDRESS:** 800 Steeles Avenue West  
Unit B-10, Suite 178  
Thornhill, Ontario, L4J 7L2  
Canada

**CONTACT NUMBER:** Canada: (416) 999-2492

**E-MAIL:** nidf@rogers.com

**Federal Security Clearances – Canada:** Government of Canada  
Level 2 – Secret Clearance

**Israel:** Israeli Defense Force / Ministry of Defense  
Level 3 – Top Secret Clearance

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### **Fields / Summary of Experience:**

- **Ontario Power Generation:** Tactical Officer – Nuclear Tactical Response Force Unit
- **Ontario Judicial Service:** Sworn Peace Officer, Use of Force Instructor
- **Atlantic Police Academy:** Sworn Police Constable, Use of Force, Police Tactics, and Tactical operations instructor.
- **Nomlaki Tribal Police Department:** Sworn Police Officer, Tactical Advisor.
- **Canada Border Services Agency (*Immigration Enforcement Division*):** Use of Force Instructor
- **Israeli Defense Force:** Special Forces Command – Counter-Terror Unit and Counter Terror School  
-Operational Team Leader, Section Commander, Lead Instructor in the fields of Counter Terror Warfare, Tactical Shooting, and Krav Maga.
- **Security and Counter Terror Advisor/Consultant**
- **Diplomatic Security Operations:** Organized and supervised protective details for Diplomatic officials of the Israeli Government traveling into Canada.
- **Instructor Qualifications:** Ontario Police College: Provincial Use of Force Instructor  
Atlantic Police Academy: Use of Force and Tactical Instructor  
Israeli Special Forces Counter Terror and Special Operations School:  
-Counter Terror Warfare Instructor  
-Tactical Shooting Instructor  
-Krav Maga Instructor

**PROFESSIONAL EXPERIENCE:**

01/2012 – **NUCLEAR TACTICAL RESPONSE FORCE OFFICER**  
06/2013 ONTARIO NUCLEAR POWER GENERATION, Ontario, Canada

Duties: Responsible for protecting Ontario Nuclear Power Generation stations, assets, and employees from criminal and terror oriented threats geared at theft of sensitive nuclear materials, sabotage, and deliberate hostile attacks. Duties include conducting foot and armored vehicle patrols of protected areas, observation and surveillance detection, conducting searches of personnel and vehicles entering and exiting controlled and protected areas, escorting transports of sensitive nuclear materials, respond to and investigate various alarms, support the Ontario Nuclear Power Generation Security Officers when needed, enforce various laws, statutes, and regulations as required including the Criminal Code of Canada, Canadian Nuclear Security Regulations Act, the Public Works Protection Act, and the Ontario Trespass to Property Act.

Duties also include receiving intelligence briefs on potential or known threats directed at Ontario Nuclear Power Generation interests, and to remain aware and prepared to respond to Active Shooter attacks or Hostage taking incidents.

Qualification for this position included a three month Basic Tactical Qualification/SWAT Course which includes:

- Introduction to and qualification on various Nuclear industry related systems and elements
- Physical protection systems
- Design Basis Threats
- Intelligence security
- Legal Authorities: Criminal Code of Canada, Nuclear Security Regulations Act, Public Works Protection Act, Trespass to Property Act, Arrest authorities, Use of Force authorities, Search authorities, and the Canada Firearms Act
- Crime scene management and evidence preservation
- Report writing and note taking
- Use of Force: Defensive Tactics, Impact weapons/Expandable baton, O.C. spray, Tactical Handcuffing
- Passive and Active subject arrest
- High Risk subject take-down and arrest
- Tactical firearm manipulation and shooting: semi-automatic handgun (Glock 22 .40 caliber) and Assault Rifle (C8/M4 Carbine 5.56mm)
- Chemical munitions
- Protective CBRN equipment
- Less lethal force/Special Impact Munitions: ARWEN
- Tactical communications
- Patrol operations, routine and high risk vehicle stops
- SMEAC/Intelligence gathering/transferring critical information
- Tactical response options planning for stealth operations, hostage rescue, injured person recovery, and Immediate Rapid Deployment/Active Shooter Intervention
- Field craft and open field tactics and searching
- Tactical Response Operations: Containment, stealth/methodical search operations, hostage rescue, and Immediate Rapid Deployment/Active Shooter Intervention
- Dynamic entry, Distraction devices, and mechanical breaching
- Explosives and IED's
- Light armoured vehicle (LAV) operations

**PROFESSIONAL EXPERIENCE:**

05/2011 – **JUDICIAL ENFORCEMENT OFFICER**  
Present ONTARIO JUDICIAL SERVICE, Toronto, Canada

Status: Sworn Peace Officer

Duties:

- Enforce Judicial orders for various government offices including the Attorney General's office.
- Issue summonses to individuals charged under the Criminal Code and Provincial Offences Act for various Police Services in the GTA.
- Use of Force Instructor: Responsible for qualifying all Ontario Judicial Service Peace Officers in all aspects of Use of Force legalities, authorities, and legislation, as well as all Use of Force options and issued defensive weapons/implements including: defensive tactics, expandable baton, O.C. spray, and tactical handcuffing.

11/2009 – **POLICE TACTICS AND USE OF FORCE INSTRUCTOR**  
Present CANADIAN LAW ENFORCEMENT TRAINING COLLEGE, Toronto, Canada

Duties:

Instruct Recruit classes in the Police Foundations accreditation course of the Canadian Law Enforcement Training College.

Courses of instruction:

- Use of Force Legal Authorities, Justification, and Articulation
- Arrest Authorities/Police Powers
- the Criminal Code of Canada
- Use of Force, including: the National and Provincial Use of Force Model, effective communication methods, defensive tactics, subject control and restraint tactics, defensive expandable baton, tactical handcuffing, subject search.

06/2014 – **TACTICAL ADVISOR**  
Present NOMLAKI TRIBAL POLICE DEPARTMENT, Tehama County, California, United States

Status: Sworn Police Officer

Duties:

- Provide assessment and advisory service to the Nomlaki Tribal Police Department on the implementation and application of Tactical/SWAT operations in relation to on going high-risk situations involving the Nomlaki Tribal Police Department.
- Participate in field deployments to conduct Tactical Operations for Nomlaki Tribal Council interests.

**PROFESSIONAL EXPERIENCE:**

*(Cont'd)*

1998 –  
Present

**SECURITY AND COUNTER-TERROR ADVISOR/CONSULTANT**  
INDEPENDENT CONTRACTOR, Global

Duties:

Assist Government, Corporate, and Civilian entities in developing, enhancing, and deploying security protocols designed to protect people, facilities, and assets against criminal and terror oriented threats. Conduct threat risk assessments to determine relevant security threats and to ensure adequate security measures are in place to mitigate those threats. Past clients include: the Nuclear industry, various schools and synagogues in the Toronto Jewish community, Provincial Government facilities, Military units deploying to hostile zones, Global corporations operating in or setting up operations in volatile regions, communities positioned in volatile regions.

05/2003 –  
03/2005

**POLICE TACTICS, USE OF FORCE AND TACTICAL INSTRUCTOR**  
ATLANTIC POLICE ACADEMY, Prince Edward Island, Canada

Status: Sworn Provincial Police Constable

Duties:

Police Tactics, Use of Force and Tactical Instructor for Police Tactical Units, Police recruits, and Nuclear Tactical Response Force Units.

Courses of Instruction:

- Tactical Operations
- Counter-terrorism and Hostage Rescue Operations
- Immediate Rapid Deployment
- Tactical Shooting and Firearms for: Handgun, Sub-Machine gun, Assault Rifle, and Shotgun
- High-risk security and Response Operations
- Intelligence gathering
- High-risk vehicle takedowns
- High-risk arrest, prisoner handling and searching
- Use of Force: Defensive Tactics, Expandable Baton, Handcuffing, O.C./Pepper Spray

08/2005 –  
09/2006

**USE OF FORCE AND ENFORCEMENT OPERATIONS INSTRUCTOR**  
CANADA BORDER SERVICES AGENCY – IMMIGRATION ENFORCEMENT DIVISION  
Greater Toronto Enforcement Center – Toronto, Ontario

Duties:

Deliver Use of Force training to Immigration Canada Enforcement Officers. Training subjects include use of force legal authorities, defensive tactics, arrest procedures, tactical handcuffing, expandable baton, O.C./pepper spray, tactical communication, and incident report writing. Duties also include conducting testing and evaluations on the Immigration Enforcement Officers to ensure operational proficiency on training material.

**PROFESSIONAL EXPERIENCE:**

*(Cont'd)*

1998 –  
Present

**COUNTER-TERROR, TACTICAL OPERATIONS, OFFICER SURVIVAL INSTRUCTOR**

Duties:

Instruct military, police, and security operation forces across North America in various areas of tactical combat, strategies, and operations. Training subjects include: counter-terror and hostage rescue operations, awareness and defense strategies against conventional and unconventional terrorism and guerrilla warfare, suicide bomber identification and interception, urban warfare, counter-ambush tactics, immediate rapid deployment/active shooter intervention, close protection operations, tactical firearms, and hand-to-hand combat/Krav Maga.

Some of the organizations that I currently train or have trained include:

ONTARIO POLICE COLLEGE – POLICE TACTICS / OFFICER SURVIVAL INSTRUCTORS  
ROYAL CANADIAN MOUNTED POLICE – VARIOUS UNITS  
TORONTO POLICE SERVICE – INTERNATIONAL POLICE OPERATIONS (*AFGHANISTAN DEPLOYMENT TEAMS*)  
TORONTO POLICE SERVICE – COMMUNITY ORIENTED RESPONSE AND PUBLIC ORDER UNIT  
TORONTO POLICE SERVICE – DEFENSIVE TACTICS INSTRUCTORS AND FIREARMS INSTRUCTORS  
HALTON REGIONAL POLICE – USE OF FORCE INSTRUCTORS  
HALTON REGIONAL POLICE – TACTICAL RESPONSE UNIT  
PEEL REGIONAL POLICE – TACTICAL AND RESCUE UNIT  
PEEL REGIONAL POLICE – AIRPORT EMERGENCY RESPONSE UNIT  
DURHAM REGIONAL POLICE – TACTICAL SUPPORT UNIT NUCLEAR SECURITY DIVISION  
YORK REGIONAL POLICE – EMERGENCY RESPONSE UNIT  
CALGARY POLICE SERVICE – TACTICAL AND RESCUE UNIT  
OTTAWA POLICE SERVICE – PRIMARY RESPONSE AND UNIFORM PATROL UNIT  
CANADIAN DEPARTMENT OF NATIONAL DEFENSE  
UNITED STATES FEDERAL LAW ENFORCEMENT TRAINING CENTER – TACTICAL INSTRUCTORS  
UNITED STATES FEDERAL MARSHAL SERVICE  
UNITED STATES FEDERAL AIR MARSHAL SERVICE  
UNITED STATES SECRET SERVICE  
UNITED STATES DIPLOMATIC SECURITY SERVICE  
UNITED STATES COAST GUARD – POLICE DIVISION  
UNITED STATES FEDERAL BUREAU OF INVESTIGATIONS – HOSTAGE RESCUE/SWAT TEAM  
UNITED STATES BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS  
UNITED STATES NATIONAL PARKS POLICE – ENFORCEMENT UNIT  
MERCER COUNTY POLICE ACADEMY – FIREARMS AND DEFENSIVE TACTICS INSTRUCTORS (*U.S.*)  
NEW JERSEY STATE POLICE – SPECIAL WEAPONS AND TACTICS UNIT / T.E.A.M.S. (*U.S.*)  
NEW YORK POLICE DEPARTMENT – EMERGENCY SUPPORT UNIT (*U.S.*)  
PENNSYLVANIA STATE POLICE – USE OF FORCE AND TACTICAL INSTRUCTORS (*U.S.*)  
CINCINNATI POLICE DEPARTMENT – SPECIAL WEAPONS AND TACTICS TEAM (*U.S.*)  
CINCINNATI AIRPORT POLICE – EMERGENCY RESPONSE TEAM (*U.S.*)  
TONAWANDA POLICE DEPARTMENT – SPECIAL WEAPONS AND TACTICS UNIT (*U.S.*)  
UNITED STATES MARINE CORPS – SPECIAL OPERATION UNITS (*JAPAN*)  
UNITED STATES AIRFORCE – BASE POLICE AND SECURITY FORCES (*U.S.*)

**PROFESSIONAL EXPERIENCE:**

(Cont'd)

2001 – **CLOSE PROTECTION OPERATIVE AND OPERATIONS COMMANDER**  
Present

Duties:

Working in conjunction with and under the direction of the Israeli General Security Service and the Israeli Consulate, organize and deploy security details for members of the Israeli Government engaged in political functions in Toronto. Some of the dignitaries I was responsible for protecting included:

Benjamin Netanyahu – Prime Minister of Israel  
Nathan Sharansky – former Deputy Prime Minister of Israel  
Dan Gillerman – Israeli Ambassador to the United Nations  
Kobi Brosh – Israeli Consul General for Toronto  
Shimon Peres – former Israeli Prime Minister and current President  
Ron Huldai – Mayor of Tel Aviv, Israel  
Alon Pinkas – Israeli Ambassador to the United States  
Ranan Gissin – Spokesperson for the Israeli Government

**MILITARY SERVICE:**

10/2006 – **ISRAELI DEFENSE FORCE**  
06/2009 **SPECIAL FORCES COMMAND – COUNTER TERROR UNIT (Unit 707)**  
**COUNTER-TERROR AND SPECIAL OPERATIONS SCHOOL (C.T.S.O.)**

Duties: Section Commander, Operational Team Leader, and Lead Counter-Terror Warfare Instructor

11/2006 to 07/2007 – Counter-Terror Warfare Operator and Instructor Qualification course.

Certified as an instructor in the areas of:

- Counter-Terror and hostage rescue operations
- Urban warfare/Close-quarters-combat
- Immediate Rapid Deployment for Active Shooter/Terror Attack Intervention
- Stealth search operations, High risk arrest and prisoner handling
- Aircraft, train, ship, and bus interdiction
- Close-protection operations
- Undercover Counter-terror intelligence operations
- Suicide bomber identification and interception
- Tactical firearms: Semi-automatic handgun (Glock 19/17 9mm, Sig Sauer P228 9mm), Sub-machine gun (Mini/Micro Uzi 9mm), Assault Rifle (AR-15/M4 Carbine 5.56mm)
- Krav Maga (*Israeli Military hand-to-hand combat/Defensive tactics system*)

Duties:

1 – Commander of the Counter-Terror School's International Training Section.  
Responsibilities include developing and delivering Counter-terror training to Special Forces units from International countries, including the United States (*Army Special Forces, Delta, Marines Special Operations Command, Rangers, Asymmetrical Warfare Group*) that attend the I.D.F. Counter-Terror School for specialized training in preparation for high risk operational deployments such as Iraq and Afghanistan. Responsibilities also included liaising and communicating with International Special Forces Unit Commanders to assess their Unit's operational requirements and develop training according to those requirements, and representing the Counter-Terror School at international joint forces training missions.

**MILITARY SERVICE:**

*(Cont'd)*

Counter-Terror Unit and Counter-Terror and Special Operations School duties continued:

- 2 – Lead instructor on the Designated Hostage Rescue Take-over Units Instruction Section. Responsibilities include delivering first phase training (new recruits) and second phase training (revision and recertification) to the I.D.F.'s Designated Hostage Rescue Take-over units (unit 767 Sayeret Matkal, unit S13 Navy SEALs, and unit 7707 Lotar Eilat) in all areas of Counter-Terror and Hostage Rescue operations.
- 3 – Assigned to the C.T.S.O. School's Chief Instruction and Research and Development Section. Responsibilities include researching and developing Counter-Terror tactics, methodologies, and strategies and to integrate those elements into the School's teaching mandate by developing lesson plans and training the school's Counter-Terror instructors. Some of the subjects I was responsible for developing and integrating into the Israeli Defense Force's teaching mandate which all I.D.F. Special Forces units are trained in today include: Immediate Rapid Deployment for Active Shooter/Terror attack in open terrain, Combat in Built-up/Urban Areas, the use of the ballistic shield in urban warfare, Single operative Counter-Terror Combat Tactics. Responsibilities also include the assessment of current operational tactics used by all I.D.F. Special Forces units and to evaluate the success ratios of those tactics during operational deployments.
- 4 – Krav Maga instructor. Responsible for developing tactics for Special Forces units with mission specific tasks that require the use of empty handed/unarmed combat strategies. Responsibilities also include training the C.T.S.O. School's Krav Maga instructors.
- 5 – Team Leader on the Operational Counter-Terror Unit. Deployments include Direct Action missions, Active Shooter incident response, high-risk entries and searches of terrorist strongholds, high-risk arrests, and covert infiltration intelligence gathering operations throughout various regions in Israel including the Gaza Strip, the West Bank, and active border points.

**Achievements:** - Received two Commendation Awards for Outstanding Service from two separate Special Ground Forces Commands for my work in developing and enhancing Counter-Terror methodologies and tactics for the Israeli Special Forces and for exceptional service in commanding the C.T.S.O. School's International Training Section.

*-Selected among 1500 nominated soldiers from the Ground Forces Command.*

- Participated in and led counter-terror and direct action missions targeting active terror organizations/cells and terrorists including counter guerrilla operations, covert infiltration into hostile environments to conduct various operations, immediate rapid deployment for active terror attacks, high-risk entries, searches, and arrests, dynamic entries, secure/stealth searches.
- Developed specialized training programs in the subject matters of Counter Terror Warfare, Hostage Rescue, Tactical Firearms Manipulation and Shooting, and Krav Maga and delivered this training to thousands of soldiers from the Israeli Special Forces, the United States of America Special Forces, and other foreign Nations Special Forces Units.

## **CERTIFICATIONS AND SKILLS:**

LANGUAGES: Fluent in English, Hebrew, and French

### **MEDICAL EMERGENCY FIRST RESPONDER CERTIFICATION:**

-Certified in Emergency First-Aid and CPR through the Canadian Red Cross Society

### **POLICE TACTICAL OPERATIONS CERTIFICATION:**

-Basic Tactical Orientation Course (Provincial Tactical Officer Qualification)  
Ontario Power Generation Nuclear Response Force (Ontario, Canada)  
-Special Weapons and Tactics and Hostage Rescue Qualification Course  
Criminal Justice Training Center – Macomb County Police Academy (Michigan, U.S.A.)

### **POLICE USE OF FORCE AND TACTICAL INSTRUCTOR CERTIFICATION:**

-Certified Provincial Use of Force Instructor – Ontario Police College  
-Qualified Use of Force and Tactical Instructor – Atlantic Police Academy  
-Certified Police Defensive Expandable Baton Instructor – Armament Systems and Procedures (ASP)  
-Certified Police Tactical Handcuffing Instructor – Armament Systems and Procedures (ASP)  
-Certified Instructor for Defensive Tactics, Expandable Baton, and Tactical Handcuffing – PPCT Systems  
-Qualified and approved Use of Force Instructor for the private security field – Ontario Provincial Police

### **UNARMED COMBAT / MARTIAL ARTS EXPERIENCE:**

-Over 30 years of extensive training and instructing experience in:

- Krav Maga (*Israeli Military Close Quarters Defensive Tactics System*) – 1<sup>st</sup> degree black belt
- Combat Hap Ki Do – 1<sup>st</sup> degree black belt
- W.T.F. Tae kwon Do – 1<sup>st</sup> degree black belt
- Jeet Kune Do

### **FIREARMS CERTIFICATION AND EXPERIENCE:**

-Possess a valid Canadian Firearms license – possession and acquisition for restricted and non-restricted firearms  
-Certified Law Enforcement Tactical Handgun Instructor – SIGARMS Academy  
-Certified Law Enforcement Armorer for SIG semi-automatic pistols – SIGARMS Academy  
-Qualified Range Safety Officer – Atlantic Police Academy  
-Qualified Firearms Instructor – Chief Firearms Office / Ontario Provincial Police  
-Qualified and approved Use of Force and Firearms Instructor for the Armored Car and Armed Guard field – Chief Firearms Office / Ontario Provincial Police  
-Extensive knowledge and experience in the instruction and use of various firearms and weapons for combat and self-defense including:

- Assault Rifles – Colt M-16/A1 / AR-15 / M4, Tavor, AK-47
- Sub-machine guns – HK-MP5, Uzi, mini/micro Uzi
- Shotguns – Remington 870, 12 gauge
- Handguns – Glock 17/22, Sig-Sauer P226/228

## **PROFESSIONAL ACCOMPLISHMENTS:**

### **➤ ONTARIO POLICE COLLEGE**

- Subject Matter Resource to the Ontario Police College instruction sections on various subject matters related to tactics and strategies that are taught to Police recruits.
- Assisted in the enhancement of the High Risk Building Entry and Search program currently taught to Police recruits at the Ontario Police College.

### **➤ CANADIAN TACTICAL OFFICERS ASSOCIATION (CTOA)**

- Appointed as the Managing Director of the Canadian Tactical Officers Association.
- Provide training to the Police Tactical and Uniform Patrol community across Canada.
- Media spokesperson for the CTOA. Made numerous interview appearances on various news programs to provide insight on several high profile Police incidents across Canada and Police Use of Force and Tactical training and deployment. Appearances include:
  - CTV News: interviewed on Police shooting incidents, Explosive Forced Entry, and Use of Force training and deployment.
  - Global Television's Investigative news program 16x9: interviewed on training and deployment of the Police Patrol Rifle.

### **➤ ACTIVE SHOOTER INTERVENTION FOR POLICE**

- Developed a specialized Active Shooter Intervention methodology for Police services. This methodology is based on the Active Shooter/Terror Attack Intervention methodology used by the Israeli Defense Force which I was responsible for enhancing as well as developing several of the tactical applications implemented within the methodology.

This methodology is a court defensible best practices system structured on North American Use of Force policies. I delivered this program to all the Special Forces Units from the United States that attended the IDF Counter Terror School in Israel for training as well as to many Police Services and Units across North America, all of which have either completely replaced their Active Shooter Intervention program with mine or have implemented many of the tactics and strategies from my program into their current Active Shooter protocols.

- To date, trained thousands of Special Forces Soldiers, Police Tactical/SWAT Officers, Uniform Patrol Police Officers, Customs Officers, Tactical and Armed Security Officers, Close Protection Agents/Bodyguards, and Instructors in all those fields from various Countries around the world including Canada, the United States, Israel, and others.
- Appeared on numerous media resources in the capacity of an expert on Terrorism, Use of Force, and other Police, Military and Security related issues. Appearances include:
  - Global News: interviewed on hostage takings, hostage rescue and Police Use of Force training.
  - Discovery Channel: interviewed and provided an in-depth analysis on the terror attacks of September 11/2001 in New York City.
  - CTV News: interviewed on the Beslan School Hostage Crisis in September 2004.

Israeli Defense Force Special Forces Command Counter Terror Unit Operator and Instructor  
Qualification course graduation Diploma presented to Nir Maman, July 2007.

**"מלמד יחי למלחמה ונתת קשת מתושה זרעותי"**  
**(שמאל ב' ל"ב, ל"ה)**

**הצאת למעודה ב"י**

<u>יניב ניר ממון</u>	<u>סמ"ר</u>	<u>[REDACTED]</u>
שם	דרגה	מ.א.

**סיים בהצלחה**

**מסגול מש"ק לוס"ר**

**יולי '07**

סג"ל [REDACTED]  
מפקד ביד"ס ולזט"ר קנ"צ

וס"ן [REDACTED]  
סגן מפקד ביד"ס ולזט"ר קנ"צ

Israeli Defense Force Ground Forces Special Qualifications Command  
Award for Outstanding Service presented to Nir Maman, April 2009.

**תעודת הצטיינות**

סמ"ר יניב ממון

בהוקרה והערכה  
על בחירתך כמצטיין קחצ"ר  
ביום העצמאות ה-61 למדינת ישראל  
י"שר כח!

אריק אלעזר, אל"מ  
מפקד המרהו"ם

יום העצמאות התשס"ט  
אפריל 2009

Israeli Defense Force Ground Forces Infantry and Paratroopers Command  
Award for Outstanding Service presented to Nir Maman, April 2009.



“בחוכמתך ותבונתך עשית לך חיל”  
(יחזקאל כ"ח ד')



מפקדת קצין חי"ר וצנחנים ראשי



# תעודת הצטיינות



מוענקת בזאת

לסמ"ר ממון יניב



על מצויינות, מסירות,



דוגמא אישית



ופועלך בחיל.



תא"ל יוסי בנר  
קצין חי"ר וצנחנים ראשי

22 אפריל 2009  
כ"ח בניסן התשס"ט



## ATLANTIC POLICE ACADEMY

Les Chipperfield, Executive Director  
P.O. Box 156  
Slemon Park, PEI Canada C0B 2A0

Location: 66 Argus Street

Tel: 902 888 6704  
Fax: 902 888 6725

File: 314

July 14, 2004

### RE: Nir Maman - Police Instructor Qualifications

This is to certify that Nir Maman is a Sworn Provincial Police Constable and Instructor with the Atlantic Police Academy, and has been since May 26, 2003.

Mr. Maman is a qualified instructor in the following areas:

#### **USE OF FORCE:** Defensive Tactics

Impact Weapons - expandable and straight baton  
Tactical Handcuffing  
O.C. Spray

#### **FIREARMS:**

Basic, advanced, and tactical shooting for;  
Handgun - Glock 17, SIG 226 9mm and 40 caliber  
Sub-machine gun - HK MP-5 9mm  
Assault Rifle - Colt AR-15/M4 Carbine 9mm and 5.56mm  
Shotgun - Remington 870/12 guage

#### **TACTICAL OPERATIONS:**

Basic and Advanced Tactical Operations  
Hostage Rescue Operations  
Building containment, assault, entry, and searching  
Critical Intelligence Gathering  
Immediate Rapid Deployment/Active Shooter Intervention  
High-Risk vehicle takedown and High-Risk Subject Arrest

Sincerely,

A handwritten signature in black ink, appearing to read "Les Chipperfield".

Les Chipperfield  
Executive Director

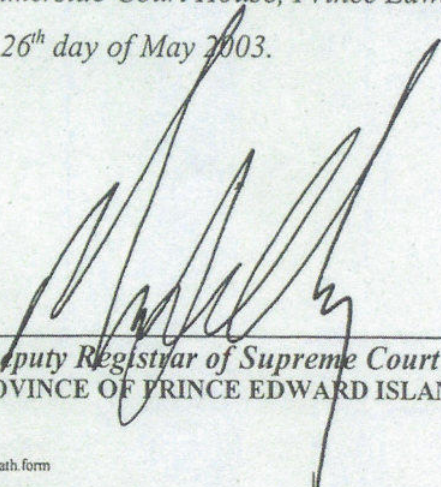


*Atlantic Police Academy*  
*Stemon Park, Prince Edward Island*

*I, Nir Maman, having been appointed a Provincial Police Constable for Prince Edward Island, do swear that I will truly, faithfully, and impartially perform the duties appertaining to the said office according to the best of my skill and ability.*

**SO HELP ME GOD**

**SWORN TO BEFORE ME** *at the*  
*Summerside Court House, Prince Edward Island*  
*the 26<sup>th</sup> day of May 2003.*

  
\_\_\_\_\_  
**Deputy Registrar of Supreme Court**  
**PROVINCE OF PRINCE EDWARD ISLAND**

  
\_\_\_\_\_  
**Signature**

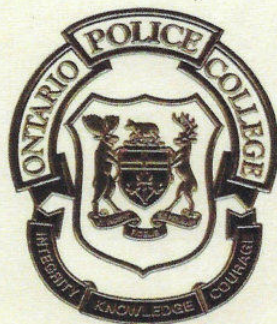
## Paskenta Band of Nomlaki Indians Tribal Police Department

### Oath of Office

*I, do solemnly swear, that I will support the Constitution of the United States, the Constitution and laws of the Paskenta Band of Nomlaki Indians and the Constitution and laws of the State of California, that I will bear true faith and allegiance to the same, and defend them against enemies, foreign and domestic, and that I will faithfully and impartially discharge, the duties of a peace officer, to the best of my ability, so help me God.*

Officer's Printed Name: <i>NIR MAMAN</i>	Officer's Signature: <i>[Signature]</i>
Chief or Deputy Chief's Signature: <i>[Signature]</i> 6-6-14	





THE ONTARIO POLICE COLLEGE WITH APPROVAL OF  
THE MINISTER OF COMMUNITY SAFETY AND CORRECTIONAL SERVICES,

PROVINCE OF ONTARIO,

HAS CONFERRED UPON

*Nir MAMAN*

THE ONTARIO POLICE TRAINING SYSTEM DIPLOMA  
ATTESTING TO SUCCESSFUL COMPLETION OF THE

*USE OF FORCE TRAINER COURSE*

*August 31, 2012*



*W. Stephen*  
A/DIRECTOR - ONTARIO POLICE COLLEGE

**ONTARIOPOWER**  
GENERATION

**CERTIFICATE OF ACHIEVEMENT**  
**NUCLEAR SECURITY RESPONSE TEAM**



This is to Certify that

*Nir Maman*

has successfully completed  
Basic Tactical Orientation Course 1201  
and has obtained the  
Nuclear Response Force Qualification

Paul Nadeau  
Vice President Nuclear Security  
Ontario Power Generation

April 26, 2012



**DEPARTMENT OF THE ARMY**  
D COMPANY, 2<sup>d</sup> BATTALION, 1<sup>st</sup> SPECIAL WARFARE TRAINING GROUP (AIRBORNE)  
UNITED STATES ARMY JOHN F. KENNEDY SPECIAL WARFARE CENTER AND SCHOOL  
FORT BRAGG, NC 28310-5000

AOJK-GPB-SD

14 May 2009

MEMORANDUM FOR RECORD

SUBJECT: Letter of Recommendation for SGM Nir Maman  
(Israeli Defense Force, Special Forces Counter-Terror  
and Special Operations School Section Commander and  
Counter-Terror Warfare Instructor)

1. In Mar of 2009 I attended a Small Unit Exchange with the IDF CT School at Camp Adam Israel. My counterpart was SGM Nir Maman. He was able to clearly articulate training methodology and mindset of the Israeli CT Operator. More importantly he was able to clarify why certain techniques were developed to combat terrorists in the 21<sup>st</sup> century. His hands on training approach was easy, straight forward, and made learning new techniques in a condensed time period effective.
2. SGM Nir Maman's explanation and practical application of the active shooter protocols were dynamic and enlightening. This technique and methodology has been adopted by many top tier counter terrorist organizations and law enforcement elements around the world. I would recommend that any organization that may be faced with a terrorist threat needs to learn this mindset and more importantly how to apply the dynamic techniques necessary to win in an active shooter scenario. Even for the most experienced CT Operator his explanation and methodology was truly enlightening and a good reminder of the basics that are often overlooked by advanced Operators.
3. SGM Nir Maman's Krav Maga combative training was the best I have seen in the last 27 years I have served in Special Forces. Typically the Krav Maga demonstrated at Dojos in the US are watered down, mixed disciplines, or very modified versions of the Krav Maga System. The IDF CT version Krav Maga that Nir taught was simple to comprehend, simple to exercise and perform, and most importantly taught the Operator proper combat fighting mindset to deal with relevant fighting scenarios.



**DEPARTMENT OF THE ARMY**  
D COMPANY, 2<sup>d</sup> BATTALION, 1<sup>st</sup> SPECIAL WARFARE TRAINING GROUP (AIRBORNE)  
UNITED STATES ARMY JOHN F. KENNEDY SPECIAL WARFARE CENTER AND SCHOOL  
FORT BRAGG, NC 28310-5000

SUBJECT: Letter of Recommendation for SGM Nir Maman  
(Israeli Defense Force, Special Forces Counter-Terror  
and Special Operations School Section Commander and  
Counter-Terror Warfare Instructor)

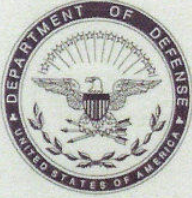
4. SGM Nir Maman's Hostage Rescue CQB training starts with active shooter protocols and culminates with detailed plans to execute HR Mission profiles which was absolutely spot on tactics to limit threat reaction time and allow a dominate exchange of control from terrorist to rescuer.

5. I recommend that any Top Tier Military or Law Enforcement unit schedule Nir at the earliest opportunity to train his techniques. It will serve as an eye opener to the most experienced Operators and will enlarge the tool box from which Operators draw from to overwhelm a threat and save lives.

6. Questions pertaining to this recommendation should be addressed to the undersigned at 910-432-9771 or [gouldp@soc.mil](mailto:gouldp@soc.mil), [peter.a.gould@us.army.mil](mailto:peter.a.gould@us.army.mil).

A handwritten signature in cursive script, reading "Peter A. Gould", is positioned above the typed name.

PETER A. GOULD  
SGM USA  
Company Sergeant Major



**UNITED STATES MARINE CORPS**  
HEADQUARTERS AND HEADQUARTERS SQUADRON  
MARINE CORPS AIR STATION IWAKUNI, JAPAN  
PSC 561 BOX 1862  
FPO AP 96310-0019

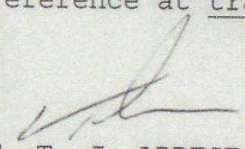
IN REPLY REFER TO:  
12000  
HADM  
8 Dec 09

From: Commanding Officer, Headquarters and Headquarters Squadron  
To: Whom It May Concern

Subj: **ACTIVE SHOOTER INTERVENTION TRAINING**

1. It is with great privilege that I write to you in recommendation of Active Shooter Intervention Training held by Mr. Nir Maman. The training we received here at Marine Corps Air Station Iwakuni, Japan was far beyond expectations. Mr. Maman and his associate came to the location and gave lasting and meaningful training that benefited all that were involved. The class was professional; the shooting at the range was conducted safely and was very meaningful in results. The class focused on an "active shooter". The class taught how to dispatch shooters in a time sensitive manor while stopping or minimizing civilian losses. This class can be tailored to the expert in the field or to the less experienced warriors.

2. I would highly recommend Active Shooter Training held by Mr. Maman. As a combat veteran, I know what it takes to stay alive. This training saves lives and is a must for any unit about to deploy to a combat zone. If you have any question concerning the training, I can be used as a reference at [tray.ardese@usmc.mil](mailto:tray.ardese@usmc.mil) or DSN 253-4670.

  
Lt. Col. T. J. ARDESE



**U.S. DEPARTMENT OF JUSTICE**  
**Federal Bureau of Investigations**

July 8, 2014

Re Nir Maman

To whom it may concern,

I am writing this letter of recommendation supporting Nir Maman's application for a Special Skills Visa. I came into contact with Mr. Maman when he was contracted to provide a Counter Terror/Active Shooter Response, Train the Trainer Course for the Federal Bureau of Investigation (FBI) Newark Division SWAT Team. Mr. Maman's training is cutting edge and I do not believe available anywhere else in the United States.

I have been a Special Agent of the FBI for the past 24 years, and have been a member of the FBI's SWAT program from 1996 to the present. I served as the SWAT Senior Team Leader (STL) for the Newark Division from 2003 until 2011 when I received a transfer to the Jacksonville Division where I am currently the STL for that team. I have attended many active shooter response schools. It is a testament to Mr. Maman that of all the training I have received, I believe his methods are the most practical and beneficial to responding law enforcement.

In today's law enforcement environment the tactical expertise which Mr. Maman possesses and shares is a rare commodity. Accordingly, it is without reservation that I recommend Nir Maman for the issuance of a Special Skills Visa.

Please note that the applicable Government Standards of Conduct require me to advise you that the information provided in this letter of recommendation is based solely on my personal knowledge of Mr. Maman and should not be construed as the official view of the FBI.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Raymond F. Lovett", is written over a horizontal line.

Raymond F. Lovett  
SWAT Senior Team Leader  
FBI, Jacksonville



*Toronto Police Service*  
**INTERNATIONAL POLICE OPERATIONS**

**CERTIFICATE OF APPRECIATION**

**NIR MAMAN**

**FOR YOUR INSTUCTION ON RECOGNITION OF EXPLOSIVES AND  
SUICIDE BOMBERS DURING THE TORONTO POLICE SERVICE  
INTERNATIONAL POLICE OPERATIONS DEPLOYMENT TRAINING**

**2012 APRIL CLASS**

A handwritten signature in blue ink, appearing to read "Bill Vollmar".

P.C. BILL VOLLMAR #8428  
TPS IPO COORDINATOR



Federal Law Enforcement Training Center  
U. S. Department of Homeland Security  
1131 Chapel Crossing Road  
Glynco, Georgia 31524

To: Nir Maman

From: Richard A. Scott  
Senior Instructor EOD/TAB

Date: June 15, 2009



Homeland  
Security

Subject: Terror Attack Active Shooter Immediate Intervention Course

Dear Nir,

I would like to take this time to offer thanks for the outstanding course you provided us on Terror Attack / Active Shooter Immediate Intervention. It was one of the most intense courses I have ever attended and proved to be worth every moment.

This course presented key elements necessary to saving lives during an Active Shooter attack that are presently missing in the Law Enforcement community. As well, this course taught the necessary mindset and tactics to help Police Officers drastically enhance their chances for surviving a deadly force encounter with an active threat.

Your unsurpassed professionalism and integrity in training was unwavering throughout the duration of this course and your level of instruction was excellent.

Specialists of your high caliber are rare. Your level of real world experience became readily apparent to all in attendance. You demonstrated an intricate understanding of the threat an Active Shooter truly poses to society.

Because of the way your training is implemented and the rare knowledge you bring to the table it should be expected that you will continue to "set the standard" for the Law Enforcement training community.

I have no loss for words when speaking to others when it comes to the quality, effectiveness, and reliability regarding your training.

Thank you again for the fantastic training experience.

//Signed

Richard A. Scott  
Senior Instructor, Enforcement Operations Division EOD/TAB  
Federal Law Enforcement Training Center  
(912) 267-2100



State of New Jersey  
OFFICE OF THE ATTORNEY GENERAL  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF STATE POLICE  
POST OFFICE BOX 7068  
WEST TRENTON NJ 08628-0068  
(609) 882-2000

JON S. CORZINE  
Governor

ANNE MILGRAM  
Attorney General

COLONEL JOSEPH R. FUENTES  
Superintendent

February 18, 2008

Mr. Nir Maman  
Krav Maga Israel, LLC  
127 Route 206, Unit 9  
Hamilton, NJ. 08610

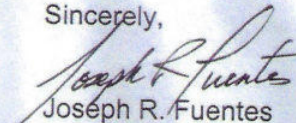
Dear Mr. Maman:

On behalf of the New Jersey State Police, I want to extend my personal gratitude to you for providing my academy staff with the exceptional Israeli Counter Terror and Rapid Deployment Tactics Course. This highly effective course of instruction was held at the Mercer County Range, Mercer County, New Jersey, from September 10-12, 2007, and allowed the New Jersey State Police to take part in training that will further enhance our current firearms capabilities.

It is important that our tactics continually evolve so our members are prepared to support modern law enforcement's mission to provide homeland and hometown protection to the citizens of this state. The Israeli Tactical Shooting system is a cutting edge, best practices training course that's geared towards ending hostile confrontations in a quick and efficient manner that limits collateral damage to innocent bystanders and police.

The division and the academy staff look forward to continuing this partnership and working with you in the future.

Sincerely,

  
Joseph R. Fuentes  
Colonel  
Superintendent

mm



New Jersey Is An Equal Opportunity Employer  
Printed on Recycled Paper and Recyclable



Detective Steven E. Hayden  
New York City Police Department – Emergency Service Unit

August 01, 2011

**RE: Active Shooter Intervention training by Nir Maman**

To whom it may concern;

This letter reflects upon the Active Shooter Intervention training for police conducted by Nir Maman. I am currently a tactical instructor for the N.Y.P.D. Emergency Service Unit with over 20 years of active law enforcement duty including patrol and tactical operations, in addition I am a veteran of the United States Military Special Forces with operational tours in Afghanistan. I have attended this course conducted by Nir Maman on two occasions. This training presented Israeli law enforcement/military response to active shooter incidents and presented several elements currently missing in the North American Law Enforcement community in relation to addressing this threat. I will attempt to compare its techniques, tactics and procedures to the current trends in North American Law Enforcement regarding response to the same.

The overwhelming response to the question of how to handle an active shooter situation by North American Law Enforcement is to form a team at the location of the incident and clear the target with the use of tactical formations and systematic searches. This approach is driven by the concept of Officer Safety, not the concept of the fastest possible mitigation of the incident in order to save the greatest number of innocent lives. The most critical element of an incident of this nature is **TIME**, the longer it takes to locate and engage the shooter, the greater the loss of life. Being a Police Officer is a dangerous profession, that said, the individual Officer has a duty to act to save innocent life without delay and if alone without backup. To wait at the scene of an active shooter as gun fire falls defenseless unarmed innocent civilians is unforgiveable, it would be a decision that Officer will be haunted by for the rest of their life. The armed responder is the only instrument that can stop the killing; it is imperative that the response is immediate and committed to ending the incident. The concept of the police being out gunned is the response of the timid, are you not better equipped to fight a gunman than the unarmed victims that fall before them? Your safety cannot be allowed to be the main consideration in your response to this type of incident; you must get in the fight and save those who cannot save themselves.

The Israeli response to an Active Shooter incident is swift and committed, their tactics and techniques have been forged in blood. As a society, Israel has experienced the greatest number of active shooter incidents the world over, they have learned what they practice at the cost of human life. The methodology taught by Nir Maman are the current most evolved tactics used to combat the Active Shooter in Israel; they are designed to save the maximum number of innocent lives while enhancing the officer's ability to mitigate threats in a complex and stressful operating environment.

This methodology reverse engineers the response structure used in North America and delivers a far more effective end result. In North America, although the spoken rule amongst the Law Enforcement community is 'the Officer will engage the situation on their own if need be', there is no safe methodology designed for single Officer response and in addition SOP's still dictate multiple Officer response and formations. The use of multiple Officers and formations is a perception of elevated safety and effectiveness, however Nir's course quickly exposes the weaknesses of this thinking that counter acts the objectives of both saving innocent lives and Officer safety.

Any type of formation work (for as little as two Officer teams up to larger teams) will only be effective in a controlled environment. An Active Shooter environment is the most uncontrolled environment that exists and will lend itself to issues such as tactical disconnect between formed up Officers. Not only will any type of a formation automatically slow down the response initiative (as real time assessment based information has to transfer through the team nucleus which must adapt collectively on an ongoing basis), but if the formation is disrupted in any way (such as an Officer down predicament) the entire formation comes to a halt until it re-collects, re-establishes individual task control within the team, and then proceeds. Even if the delay is mere seconds, that is a potential for more executed victims.

The Israeli methodology begins with single Officer response tactics and strategies which become the foundation for a multiple Officer team where any additional Officers blend seamlessly into the dynamic. This innovated platform automatically solves two issues. First it provides the most effective approach for single Officer response, it allows for an effective deployment of a single Officer should the severity of the circumstances call for it. Second, it allows for a more effective 'team' operation in an uncontrolled environment. Should the formation encounter a disconnect of any sort (such as an Officer down) the single Officer based team dynamic is not hindered in any way nor is it delayed.

In addition, I found this methodology to provide a much more tactically sound and safer outcome for Officers responding to a situation where they may encounter multiple dedicated, skilled, and hostile threats. The tactics used are simple and direct, complicated plans and techniques tend to fail under the stress of actual combat. This methodology does not deviate at all from the responsibility of the North American Law Enforcement community, it conforms fully to the policies and legal requirements of Use of Force criteria and litigation.

The Israeli response to Active Shooter Incidents is a fast, effective and tested best practices system. Any Police Department would do well to learn this methodology and its tactics and put them into practice, train for your next fight, it will come.

Nir Maman is a committed teacher and professional. As an instructor, Nir is polished and engaging, the intensity, experience, and knowledge he brings to his teaching is refreshing. The methodology and tactics are easily learned and retained with practice; the most important element is the mental attitude and mind set instilled into the individual Officer in this training. The current situation in North America calls for an absolute commitment by Law Enforcement to prepare to fight our enemy in our streets, schools and work places with the dedication and focus to win at all costs.

Sincerely,

//signed//

Detective Steven E. Hayden  
New York City Police Department  
Emergency Service Unit  
Tactical Training Section

# Western Chester County Emergency Response Team

Downington Police  
Chief James McGowan III

Caln. Twp. Police  
Chief Brian Byerly

Brandywine Regional Police  
Chief Mark Kocsi

East Fallowfield Police  
Chief Peter J. Mango



West Brandywine Police  
Chief Walter Werner

Coatesville Police  
Chief J. Canale

Parkesburg Police  
Chief Brian Sheller

February 28/2011

To: Nir Maman  
CT 707 - Israeli Krav Systems Inc.

RE: Dynamic Response Counter Ambush Shooting, Active Shooter Intervention,  
and Secure Search Training.

Mr. Maman,

I wanted to express my gratitude for offering the Active Shooter Intervention, Dynamic Response Shooting, and Secure Search training on February 23-24, 2011 in Hamilton New Jersey hosted by the Mercer County Police Academy. You are by far one of the best instructors I have had the privilege from which to learn. Your knowledge of armed and unarmed combat is astounding. All the material was presented in a clear and concise manner.

Your methodology in the world of counter terrorism and tactics should be standard training for all those in public service. My training philosophies will certainly change from this point on. I believe that your training will have a serious positive impact on our abilities to deal with Active Shooter incidents. What I found equally as valuable was your operational experience in this subject matter. It is one thing to train based on principles handed down from your predecessors, but in this case you are at the tip of the spear. Your basis for the tactics and information taught is from real world experience in one of the world's most violent places. As an instructor I can say that we would be doing a great disservice to those we are charged to train if we did not take your subject matter expertise to heart.

I thank you, Nir Maman, for your dedication and professionalism. The training was a turning point for me and those in my charge. You have clearly made an impact on our agency that will most likely result in saving lives.

Respectfully,

//Signed//

Sgt. Kevin Bernard  
Caln Township Police Department  
Team Leader for WCC Emergency Response Team  
(610) 383-1821 ext. 128

UNITED STATES MARSHALS SERVICE

# CERTIFICATE of APPRECIATION



Presented to

Instructor Nir Maman

*For your contributions to the mission of the United States Marshals Service  
Israeli Tactical Shooting Immediate Rapid Deployment and Counter-Terror Engagements  
September 7, 2007*

Honorable James T. Plousis  
United States Marshal

October 17, 2007

Date

CONSULATE GENERAL OF ISRAEL  
TORONTO

180 BLOOR ST. WEST, SUITE 700  
TORONTO, ONTARIO M5S 2V6  
Telephone: (416) 640-8500  
Fax: (416) 640-8555  
Website: <http://toronto.mfa.gov.il>



הקונסוליה הכללית של ישראל  
טורונטו

June 14, 2010

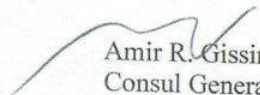
Mr. Nir Maman  
International Defense Force  
800 Steeles Avenue West  
Unit B-10, Suite 178  
Thornhill, ON L4J 7L2

Dear Mr. Maman,

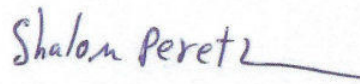
On behalf of the Consulate General of Israel, I would like to express our sincere thanks for your assistance during Prime Minister Benjamin Netanyahu's recent visit. As you may be aware, this was the first visit to Toronto by an Israeli Prime Minister in 32 years, and we were very proud that he came here and addressed this year's Walk for Israel rally.

However, such a visit requires a great deal of planning and attention to security matters. It would not have been possible without the expertise and dedication of professionals like yourself who helped to ensure its success. For this, we are most grateful, and once again convey our thanks for all your efforts.

Sincerely,

  
Amir R. Gissin  
Consul General

Sincerely,

  
Shalom Peretz  
Head of Security

In November 2008 the Israeli Defense Force's Counter-Terror Unit and Counter-Terror and Special Operations School (Unit 707), was featured in Special Operations Report Magazine. This magazine is a closed publication exclusive to the Global Military and Police Special Operations Community. Sergeant-Major Nir Maman shown on the cover of the issue (on the right in the standing position) was selected to be the spokesperson and representative of the unit for the feature.



# **Exhibit C**

1 DARREN S. ENENSTEIN (SBN 195894)

Email: *dse@enensteinlaw.com*

2 NED M. GELHAAR (SBN 163185)

Email: *ngelhaar@enensteinlaw.com*

3 NIMA KAMALI (SBN 294401)

Email: *nkamali@enensteinlaw.com*

4 JOY D. LLAGUNO (SBN 311867)

Email: *jllaguno@enensteinlaw.com*

5 **ENENSTEIN PHAM & GLASS**

12121 Wilshire Boulevard, Suite 600

7 Los Angeles, California 90025

8 Tel.: (310) 899-2070

9 Fax: (310) 496-1930

Attorneys for Plaintiff STEPHEN RUSSELL

10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12 **STEPHEN RUSSELL**, an individual,

Case No. 4:18-cv-06691-RS

13 Plaintiffs,

**PLAINTIFF STEPHEN RUSSELL'S  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS, SET ONE TO DFW  
METROPLEX TRAINING  
ACADEMY**

14 vs.

16 **NIR MAMAN**, an individual; **CT707**

17 **ISRAELI KRAV SYSTEMS, INC.**,

an Ontario corporation; **GEORGE**

18 **AKKELQUIST**, an individual; **DFW**

19 **METROPLEX TRAINING**

**ACADEMY**, a New York entity form

20 unknown, and **DOES 1 through 20**,

21 inclusive,

22 Defendants.

1 **PROPOUNDING PARTY: Plaintiff STEPHEN RUSSELL**

2 **RESPONDING PARTY: Defendant, DFW METROPLEX TRAINING**  
3 **ACADEMY**

4 **SET: ONE (1)**

5 Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff, Stephen  
6 Russell, ("Russell") hereby requests that Defendant, DFW Metroplex Training  
7 Academy, ("DFW") identify and product the originals or best available copies of the  
8 writings and other things described below for inspection and copying within the time  
9 and in the manner prescribed by the Federal Rules of Civil Procedure. The place for  
10 inspection shall be the law offices of Enenstein Pham & Glass, 12121 Wilshire  
11 Boulevard, Suite 600, Los Angeles, California 90025.

12 **DEFINITIONS**

13 1. "YOU," or "YOUR," means DFW METROPLEX TRAINING  
14 ACADEMY, and any or all of its agents and/or representatives.

15 2. "RUSSELL" means STEPHEN RUSSELL, and any or all of his agents  
16 and/or representatives.

17 3. "COMMUNICATION(S)" means any form of communication or  
18 correspondence whether oral or written between one or more persons, including but  
19 not limited to, letters, memoranda, cards, circulars, bulletins, dispatches,  
20 notifications emails, text messages, recordings of oral conversations blog posts,  
21 information transmitted through social network websites whether produced,  
22 reproduced or stored USB disk drives, data cells or other media or data compilation  
23 from which information can be obtained, including originals, copies (with or without  
24 notes or changes thereon) and drafts, including, but not limited to, papers, books,  
25 letters, tangible things, correspondence, telegrams, cables, telex messages,  
26 memoranda, notes, notations, work papers, transcripts, minutes, reports, recordings  
27 of telephone conversations, or interviews or of conferences, or other meetings,  
28 affidavits, statements, summaries, opinions, reports, studies, work sheets, proposals,

1 contracts, agreements, statistical records, desk calendars, appointment books,  
2 diaries, lists, tabulations, sound recordings, computer printouts, data processing  
3 output and input, microfilms, photographs or negatives thereof, all other records kept  
4 by electronic, photographic or mechanical means, and any or all matter or material  
5 attached or affixed to any of the above.

6 4. "DOCUMENT(S)" means any handwriting, typewriting, printing,  
7 photostating, photographing, photocopying, transmitting by electronic mail or  
8 facsimile, and every other means of recording upon any tangible thing any form of  
9 communication or representation, including letters, words, pictures, sounds, or  
10 symbols, or combinations thereof, and any record thereby created, regardless of the  
11 manner in which the record has been stored.

12 5. "REFER(S)", "RELATED TO," "RELATES TO," or "RELATE TO"  
13 means to constitute, embody, identify, evidence, reflect, record, show, memorialize,  
14 consist of, discuss, describe, mention, concern, consider, evaluate, review, analyze,  
15 report on, support, or bear upon the subject matter of the request.

16 6. "RELEVANT TIME PERIOD" means January 1, 2017 to the present.

17 7. "ENTITY" means any organization, company, and/or corporation,  
18 including any government, public, and/or private organization.

19 8. "SECURITY SERVICES" means any services provided to RUSSELL  
20 RELATED to security, protection, cyber-security, surveillance, counter-  
21 surveillance, threat risk assessment and mitigation, infrastructure and disruptive  
22 environment protection, investigation, intelligence, and/or counter intelligence  
23 services.

### 24 **INSTRUCTIONS**

25 1. This Request for Production covers all responsive  
26 COMMUNICATIONS and DOCUMENTS in your possession, custody or control,  
27 including COMMUNICATIONS and DOCUMENTS that are in the possession,  
28 custody or control of your agents or representatives, unless privileged or exempted

1 from production under federal law.

2 2. For each written response:

3 a. Produce responsive COMMUNICATIONS and DOCUMENTS;

4 b. Produce all electronically stored COMMUNICATIONS and  
5 DOCUMENTS in both hard copy and native format;

6 c. State whether you have produced all responsive  
7 COMMUNICATIONS and DOCUMENTS;

8 d. State all objections to any request with specificity, and if the event  
9 an objection relates only to a part or portion of a request, specify the part or portion  
10 of the response objected to and state whether you have produced or intend to permit  
11 inspection and copying of the remaining parts or portions; and;

12 e. Organize all COMMUNICATIONS and DOCUMENTS and  
13 things produced for inspection, by among other things, labeling the  
14 COMMUNICATIONS and DOCUMENTS and categorizing them to correspond to  
15 the Requests.

16 3. In the event that any COMMUNICATION or DOCUMENT or other  
17 thing called for by any request has been destroyed, discarded, or otherwise disposed  
18 of, that COMMUNICATION or DOCUMENT or other thing is to be identified as  
19 completely as possible, and the following information is to be provided: date of  
20 disposal, manner of disposal, reason for disposal, person authorizing the disposal,  
21 and person disposing of the document or other thing.

22 4. If you claim that the attorney-client privilege or the attorney work-  
23 product doctrine is applicable to any responsive COMMUNICATION or  
24 DOCUMENT, then you shall state with respect to that COMMUNICATION or  
25 DOCUMENT:

26 a. The reason for withholding the COMMUNICATION or  
27 DOCUMENT;

28 b. The date the COMMUNICATION or DOCUMENT was created;

1 c. The identity of the COMMUNICATION or DOCUMENT'S  
2 author, including employment title and description, current address, and telephone  
3 number;

4 d. The identity of each person to whom the COMMUNICATION  
5 or DOCUMENT was sent, including employment title and description, current  
6 address, and telephone number;

7 e. The custodian of the COMMUNICATION or DOCUMENT,  
8 including employment title and description, current address, and telephone number;  
9 and

10 f. A description of the COMMUNICATION or DOCUMENT  
11 sufficient to permit Endurance and the Arbitrators to assess the validity of any  
12 privilege, immunity, or exemption asserted.

13 5. This Request for Production is continuous in nature. If you discover  
14 additional documents called for by this Request, then promptly amend and  
15 supplement your responses and production.

16 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

17 **REQUEST FOR PRODUCTION NO. 1**

18 All DOCUMENTS RELATING to YOUR introduction to RUSSELL.

19 **REQUEST FOR PRODUCTION NO. 2**

20 All DOCUMENTS RELATING to YOUR COMMUNICATIONS with  
21 RUSSELL at any time from YOUR introduction to RUSSELL to the present.

22 **REQUEST FOR PRODUCTION NO. 3**

23 All DOCUMENTS RELATING to the SECURITY SERVICES provided by  
24 YOU to RUSSELL during the RELEVANT TIME PERIOD

25 **REQUEST FOR PRODUCTION NO. 4**

26 All COMMUNICATIONS RELATING to the SECURITY SERVICES  
27 provided by YOU during the RELEVANT TIME PERIOD.

28 ///

1 **REQUEST FOR PRODUCTION NO. 5**

2 All DOCUMENTS evidencing and/or RELATING to an accounting of all  
3 SECURITY SERVICES provided by YOU to RUSSELL during the RELEVANT  
4 TIME PERIOD.

5 **REQUEST FOR PRODUCTION NO. 6**

6 All DOCUMENTS evidencing and/or RELATING to any contracts between  
7 YOU and RUSSELL.

8 **REQUEST FOR PRODUCTION NO. 7**

9 All COMMUNICATIONS RELATING to and/or referencing RUSSELL  
10 from the RELEVANT TIME PERIOD.

11 **REQUEST FOR PRODUCTION NO. 8**

12 All DOCUMENTS RELATING to any payments requested from RUSSELL  
13 by YOU from the RELEVANT TIME PERIOD.

14 **REQUEST FOR PRODUCTION NO. 9**

15 All DOCUMENTS RELATING to any monies paid by RUSSELL to YOU  
16 from the RELEVANT TIME PERIOD.

17 **REQUEST FOR PRODUCTION NO. 10**

18 All COMMUNICATIONS to any subcontractors retained by YOU to provide  
19 SECURITY SERVICES to RUSSELL from the RELEVANT TIME PERIOD.

20 **REQUEST FOR PRODUCTION NO. 11**

21 All DOCUMENTS RELATING to any payments made to third parties to  
22 provide SECURITY SERVICES to RUSSELL from the RELEVANT TIME  
23 PERIOD.

24 **REQUEST FOR PRODUCTION NO. 12**

25 All COMMUNICATIONS between YOU and RUSSELL from the  
26 RELEVANT TIME PERIOD.

27 ///

28 ///

1 **REQUEST FOR PRODUCTION NO. 13**

2 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
3 to RUSELL of any threats against RUSSELL.

4 **REQUEST FOR PRODUCTION NO. 14**

5 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
6 that RUSSELL was in danger.

7 **REQUEST FOR PRODUCTION NO. 15**

8 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
9 that there were threats to RUSSELL's safety.

10 **REQUEST FOR PRODUCTION NO. 16**

11 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
12 of threats against the safety of RUSSELL'S family.

13 **REQUEST FOR PRODUCTION NO. 17**

14 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
15 that RUSSELL's family was in danger.

16 **REQUEST FOR PRODUCTION NO. 18**

17 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
18 that there were threats against RUSSELL'S business interests.

19 **REQUEST FOR PRODUCTION NO. 19**

20 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
21 that RUSSELL's business interests were in danger.

22 **REQUEST FOR PRODUCTION NO. 20**

23 All COMMUNICATIONS between YOU and RUSSELL from the  
24 RELEVANT TIME PERIOD.

25 **REQUEST FOR PRODUCTION NO. 21**

26 All COMMUNICATIONS referring to RUSSELL.

27 ///

1 **REQUEST FOR PRODUCTION NO. 22**

2 YOUR license from the California Bureau of Security and Investigative  
3 Services.

4 **REQUEST FOR PRODUCTION NO. 23**

5 All DOCUMENTS evidencing and/or RELATING to any of YOUR licenses  
6 to provide security services.

7 **REQUEST FOR PRODUCTION NO. 24**

8 All DOCUMENTS evidencing and/or RELATING to any of YOUR licenses  
9 to provide investigative services.

10 **REQUEST FOR PRODUCTION NO. 25**

11 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
12 that there was ongoing unwanted surveillance of RUSSELL by third parties.

13 **REQUEST FOR PRODUCTION NO. 26**

14 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
15 of government investigations of RUSSELL.

16 **REQUEST FOR PRODUCTION NO. 27**

17 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
18 that individuals had active hits out for RUSSELL'S life.

19 **REQUEST FOR PRODUCTION NO. 28**

20 All DOCUMENTS evidencing and/or RELATING to the SECURITY  
21 SERVICES budget estimated by YOU.

22 **REQUEST FOR PRODUCTION NO. 29**

23 All DOCUMENTS evidencing and/or RELATING to whom/where payments  
24 made by RUSSELL were used towards the SECURITY SERVICES.

25 **REQUEST FOR PRODUCTION NO. 30**

26 All DOCUMENTS RELATING to any allegations of misconduct by YOU  
27 from any ENTITY.

28 ///

1 **REQUEST FOR PRODUCTION NO. 31**

2 All DOCUMENTS RELATING to any disciplinary action taken against YOU  
3 by any ENTITY.

4 **REQUEST FOR PRODUCTION NO. 32**

5 All DOCUMENTS RELATING to any investigations into YOU for  
6 misconduct by any ENTITY.

7  
8 DATE: January 17, 2018

ENENSTEIN PHAM & GLASS

9  
10 BY:

11 /s/ Ned M. Gelhaar

12 Darren S. Enenstein, Esq.

13 Ned M. Gelhaar Esq.

14 Joy D. Llaguno, Esq.

Attorneys for Plaintiff

15 Stephen Russell  
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**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is: 12121 Wilshire Boulevard, Suite 600, Los Angeles, California 90025.

On January 17, 2019, I served the foregoing document(s) entitled: **PLAINTIFF STEPHEN RUSSELL'S REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE TO DFW METROPLEX TRAINING ACADEMY**, on the following interested party/ies:

ROD DIVELBISS  
JRA LAW PARTNERS, LLP  
450 Pacific Avenue, Suite 200  
San Francisco, CA 94133

DEK KETCHUM  
LAW OFFICES OF DEK KETCHUM  
900 Veterans Boulevard, Suite 600  
Redwood City, California 94063

*Attorneys for Defendants  
NIR MAMAN and CT707 ISRAELI  
KRAV SYSTEMS, INC.*

*Attorneys for Defendants  
GEORGE AKKELQUIST and DFW  
METROPLEX TRAINING ACADEMY*

**[X] BY PERSONAL SERVICE:** Placing the document(s) listed above in a sealed envelope(s) and by causing personal delivery of the envelope(s) to the person(s) at the address(es) set forth above.

I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed this 17th day of January, 2019, in Los Angeles County, California.

/s/ Omar Rodriguez  
OMAR RODRIGUEZ

**EXHIBIT "1"**

# **NIR MAMAN**

## ***CURRICULUM VITAE***

**- Confidential -**

**This document contains sensitive information and is  
intended for addressee only.**

## CURRICULUM VITAE

**NAME:** Nir Maman

**ADDRESS:** 800 Steeles Avenue West  
Unit B-10, Suite 178  
Thornhill, Ontario, L4J 7L2  
Canada

**CONTACT NUMBER:** Canada: (416) 999-2492

**E-MAIL:** nidf@rogers.com

**Federal Security Clearances – Canada:** Government of Canada  
Level 2 – Secret Clearance

**Israel:** Israeli Defense Force / Ministry of Defense  
Level 3 – Top Secret Clearance

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### **Fields / Summary of Experience:**

- **Ontario Power Generation:** Tactical Officer – Nuclear Tactical Response Force Unit
- **Ontario Judicial Service:** Sworn Peace Officer, Use of Force Instructor
- **Atlantic Police Academy:** Sworn Police Constable, Use of Force, Police Tactics, and Tactical operations instructor.
- **Nomlaki Tribal Police Department:** Sworn Police Officer, Tactical Advisor.
- **Canada Border Services Agency (*Immigration Enforcement Division*):** Use of Force Instructor
- **Israeli Defense Force:** Special Forces Command – Counter-Terror Unit and Counter Terror School  
-Operational Team Leader, Section Commander, Lead Instructor in the fields of Counter Terror Warfare, Tactical Shooting, and Krav Maga.
- **Security and Counter Terror Advisor/Consultant**
- **Diplomatic Security Operations:** Organized and supervised protective details for Diplomatic officials of the Israeli Government traveling into Canada.
- **Instructor Qualifications:** Ontario Police College: Provincial Use of Force Instructor  
Atlantic Police Academy: Use of Force and Tactical Instructor  
Israeli Special Forces Counter Terror and Special Operations School:  
-Counter Terror Warfare Instructor  
-Tactical Shooting Instructor  
-Krav Maga Instructor

**PROFESSIONAL EXPERIENCE:**

01/2012 – **NUCLEAR TACTICAL RESPONSE FORCE OFFICER**  
06/2013 ONTARIO NUCLEAR POWER GENERATION, Ontario, Canada

Duties: Responsible for protecting Ontario Nuclear Power Generation stations, assets, and employees from criminal and terror oriented threats geared at theft of sensitive nuclear materials, sabotage, and deliberate hostile attacks. Duties include conducting foot and armored vehicle patrols of protected areas, observation and surveillance detection, conducting searches of personnel and vehicles entering and exiting controlled and protected areas, escorting transports of sensitive nuclear materials, respond to and investigate various alarms, support the Ontario Nuclear Power Generation Security Officers when needed, enforce various laws, statutes, and regulations as required including the Criminal Code of Canada, Canadian Nuclear Security Regulations Act, the Public Works Protection Act, and the Ontario Trespass to Property Act.

Duties also include receiving intelligence briefs on potential or known threats directed at Ontario Nuclear Power Generation interests, and to remain aware and prepared to respond to Active Shooter attacks or Hostage taking incidents.

Qualification for this position included a three month Basic Tactical Qualification/SWAT Course which includes:

- Introduction to and qualification on various Nuclear industry related systems and elements
- Physical protection systems
- Design Basis Threats
- Intelligence security
- Legal Authorities: Criminal Code of Canada, Nuclear Security Regulations Act, Public Works Protection Act, Trespass to Property Act, Arrest authorities, Use of Force authorities, Search authorities, and the Canada Firearms Act
- Crime scene management and evidence preservation
- Report writing and note taking
- Use of Force: Defensive Tactics, Impact weapons/Expandable baton, O.C. spray, Tactical Handcuffing
- Passive and Active subject arrest
- High Risk subject take-down and arrest
- Tactical firearm manipulation and shooting: semi-automatic handgun (Glock 22 .40 caliber) and Assault Rifle (C8/M4 Carbine 5.56mm)
- Chemical munitions
- Protective CBRN equipment
- Less lethal force/Special Impact Munitions: ARWEN
- Tactical communications
- Patrol operations, routine and high risk vehicle stops
- SMEAC/Intelligence gathering/transferring critical information
- Tactical response options planning for stealth operations, hostage rescue, injured person recovery, and Immediate Rapid Deployment/Active Shooter Intervention
- Field craft and open field tactics and searching
- Tactical Response Operations: Containment, stealth/methodical search operations, hostage rescue, and Immediate Rapid Deployment/Active Shooter Intervention
- Dynamic entry, Distraction devices, and mechanical breaching
- Explosives and IED's
- Light armoured vehicle (LAV) operations

**PROFESSIONAL EXPERIENCE:**

05/2011 – **JUDICIAL ENFORCEMENT OFFICER**  
Present ONTARIO JUDICIAL SERVICE, Toronto, Canada

Status: Sworn Peace Officer

Duties:

- Enforce Judicial orders for various government offices including the Attorney General's office.
- Issue summonses to individuals charged under the Criminal Code and Provincial Offences Act for various Police Services in the GTA.
- Use of Force Instructor: Responsible for qualifying all Ontario Judicial Service Peace Officers in all aspects of Use of Force legalities, authorities, and legislation, as well as all Use of Force options and issued defensive weapons/implements including: defensive tactics, expandable baton, O.C. spray, and tactical handcuffing.

11/2009 – **POLICE TACTICS AND USE OF FORCE INSTRUCTOR**  
Present CANADIAN LAW ENFORCEMENT TRAINING COLLEGE, Toronto, Canada

Duties:

Instruct Recruit classes in the Police Foundations accreditation course of the Canadian Law Enforcement Training College.

Courses of instruction:

- Use of Force Legal Authorities, Justification, and Articulation
- Arrest Authorities/Police Powers
- the Criminal Code of Canada
- Use of Force, including: the National and Provincial Use of Force Model, effective communication methods, defensive tactics, subject control and restraint tactics, defensive expandable baton, tactical handcuffing, subject search.

06/2014 – **TACTICAL ADVISOR**  
Present NOMLAKI TRIBAL POLICE DEPARTMENT, Tehama County, California, United States

Status: Sworn Police Officer

Duties:

- Provide assessment and advisory service to the Nomlaki Tribal Police Department on the implementation and application of Tactical/SWAT operations in relation to on going high-risk situations involving the Nomlaki Tribal Police Department.
- Participate in field deployments to conduct Tactical Operations for Nomlaki Tribal Council interests.

**PROFESSIONAL EXPERIENCE:**

*(Cont'd)*

1998 –  
Present

**SECURITY AND COUNTER-TERROR ADVISOR/CONSULTANT**  
INDEPENDENT CONTRACTOR, Global

Duties:

Assist Government, Corporate, and Civilian entities in developing, enhancing, and deploying security protocols designed to protect people, facilities, and assets against criminal and terror oriented threats. Conduct threat risk assessments to determine relevant security threats and to ensure adequate security measures are in place to mitigate those threats. Past clients include: the Nuclear industry, various schools and synagogues in the Toronto Jewish community, Provincial Government facilities, Military units deploying to hostile zones, Global corporations operating in or setting up operations in volatile regions, communities positioned in volatile regions.

05/2003 –  
03/2005

**POLICE TACTICS, USE OF FORCE AND TACTICAL INSTRUCTOR**  
ATLANTIC POLICE ACADEMY, Prince Edward Island, Canada

Status: Sworn Provincial Police Constable

Duties:

Police Tactics, Use of Force and Tactical Instructor for Police Tactical Units, Police recruits, and Nuclear Tactical Response Force Units.

Courses of Instruction:

- Tactical Operations
- Counter-terrorism and Hostage Rescue Operations
- Immediate Rapid Deployment
- Tactical Shooting and Firearms for: Handgun, Sub-Machine gun, Assault Rifle, and Shotgun
- High-risk security and Response Operations
- Intelligence gathering
- High-risk vehicle takedowns
- High-risk arrest, prisoner handling and searching
- Use of Force: Defensive Tactics, Expandable Baton, Handcuffing, O.C./Pepper Spray

08/2005 –  
09/2006

**USE OF FORCE AND ENFORCEMENT OPERATIONS INSTRUCTOR**  
CANADA BORDER SERVICES AGENCY – IMMIGRATION ENFORCEMENT DIVISION  
Greater Toronto Enforcement Center – Toronto, Ontario

Duties:

Deliver Use of Force training to Immigration Canada Enforcement Officers. Training subjects include use of force legal authorities, defensive tactics, arrest procedures, tactical handcuffing, expandable baton, O.C./pepper spray, tactical communication, and incident report writing. Duties also include conducting testing and evaluations on the Immigration Enforcement Officers to ensure operational proficiency on training material.

**PROFESSIONAL EXPERIENCE:**

*(Cont'd)*

1998 –  
Present

**COUNTER-TERROR, TACTICAL OPERATIONS, OFFICER SURVIVAL INSTRUCTOR**

Duties:

Instruct military, police, and security operation forces across North America in various areas of tactical combat, strategies, and operations. Training subjects include: counter-terror and hostage rescue operations, awareness and defense strategies against conventional and unconventional terrorism and guerrilla warfare, suicide bomber identification and interception, urban warfare, counter-ambush tactics, immediate rapid deployment/active shooter intervention, close protection operations, tactical firearms, and hand-to-hand combat/Krav Maga.

Some of the organizations that I currently train or have trained include:

ONTARIO POLICE COLLEGE – POLICE TACTICS / OFFICER SURVIVAL INSTRUCTORS  
ROYAL CANADIAN MOUNTED POLICE – VARIOUS UNITS  
TORONTO POLICE SERVICE – INTERNATIONAL POLICE OPERATIONS (*AFGHANISTAN DEPLOYMENT TEAMS*)  
TORONTO POLICE SERVICE – COMMUNITY ORIENTED RESPONSE AND PUBLIC ORDER UNIT  
TORONTO POLICE SERVICE – DEFENSIVE TACTICS INSTRUCTORS AND FIREARMS INSTRUCTORS  
HALTON REGIONAL POLICE – USE OF FORCE INSTRUCTORS  
HALTON REGIONAL POLICE – TACTICAL RESPONSE UNIT  
PEEL REGIONAL POLICE – TACTICAL AND RESCUE UNIT  
PEEL REGIONAL POLICE – AIRPORT EMERGENCY RESPONSE UNIT  
DURHAM REGIONAL POLICE – TACTICAL SUPPORT UNIT NUCLEAR SECURITY DIVISION  
YORK REGIONAL POLICE – EMERGENCY RESPONSE UNIT  
CALGARY POLICE SERVICE – TACTICAL AND RESCUE UNIT  
OTTAWA POLICE SERVICE – PRIMARY RESPONSE AND UNIFORM PATROL UNIT  
CANADIAN DEPARTMENT OF NATIONAL DEFENSE  
UNITED STATES FEDERAL LAW ENFORCEMENT TRAINING CENTER – TACTICAL INSTRUCTORS  
UNITED STATES FEDERAL MARSHAL SERVICE  
UNITED STATES FEDERAL AIR MARSHAL SERVICE  
UNITED STATES SECRET SERVICE  
UNITED STATES DIPLOMATIC SECURITY SERVICE  
UNITED STATES COAST GUARD – POLICE DIVISION  
UNITED STATES FEDERAL BUREAU OF INVESTIGATIONS – HOSTAGE RESCUE/SWAT TEAM  
UNITED STATES BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS  
UNITED STATES NATIONAL PARKS POLICE – ENFORCEMENT UNIT  
MERCER COUNTY POLICE ACADEMY – FIREARMS AND DEFENSIVE TACTICS INSTRUCTORS (*U.S.*)  
NEW JERSEY STATE POLICE – SPECIAL WEAPONS AND TACTICS UNIT / T.E.A.M.S. (*U.S.*)  
NEW YORK POLICE DEPARTMENT – EMERGENCY SUPPORT UNIT (*U.S.*)  
PENNSYLVANIA STATE POLICE – USE OF FORCE AND TACTICAL INSTRUCTORS (*U.S.*)  
CINCINNATI POLICE DEPARTMENT – SPECIAL WEAPONS AND TACTICS TEAM (*U.S.*)  
CINCINNATI AIRPORT POLICE – EMERGENCY RESPONSE TEAM (*U.S.*)  
TONAWANDA POLICE DEPARTMENT – SPECIAL WEAPONS AND TACTICS UNIT (*U.S.*)  
UNITED STATES MARINE CORPS – SPECIAL OPERATION UNITS (*JAPAN*)  
UNITED STATES AIRFORCE – BASE POLICE AND SECURITY FORCES (*U.S.*)

**PROFESSIONAL EXPERIENCE:**

(Cont'd)

2001 – **CLOSE PROTECTION OPERATIVE AND OPERATIONS COMMANDER**  
Present

Duties:

Working in conjunction with and under the direction of the Israeli General Security Service and the Israeli Consulate, organize and deploy security details for members of the Israeli Government engaged in political functions in Toronto. Some of the dignitaries I was responsible for protecting included:

Benjamin Netanyahu – Prime Minister of Israel  
Nathan Sharansky – former Deputy Prime Minister of Israel  
Dan Gillerman – Israeli Ambassador to the United Nations  
Kobi Brosh – Israeli Consul General for Toronto  
Shimon Peres – former Israeli Prime Minister and current President  
Ron Huldai – Mayor of Tel Aviv, Israel  
Alon Pinkas – Israeli Ambassador to the United States  
Ranan Gissin – Spokesperson for the Israeli Government

**MILITARY SERVICE:**

10/2006 – **ISRAELI DEFENSE FORCE**  
06/2009 **SPECIAL FORCES COMMAND – COUNTER TERROR UNIT (Unit 707)**  
**COUNTER-TERROR AND SPECIAL OPERATIONS SCHOOL (C.T.S.O.)**

Duties: Section Commander, Operational Team Leader, and Lead Counter-Terror Warfare Instructor

11/2006 to 07/2007 – Counter-Terror Warfare Operator and Instructor Qualification course.

Certified as an instructor in the areas of:

- Counter-Terror and hostage rescue operations
- Urban warfare/Close-quarters-combat
- Immediate Rapid Deployment for Active Shooter/Terror Attack Intervention
- Stealth search operations, High risk arrest and prisoner handling
- Aircraft, train, ship, and bus interdiction
- Close-protection operations
- Undercover Counter-terror intelligence operations
- Suicide bomber identification and interception
- Tactical firearms: Semi-automatic handgun (Glock 19/17 9mm, Sig Sauer P228 9mm), Sub-machine gun (Mini/Micro Uzi 9mm), Assault Rifle (AR-15/M4 Carbine 5.56mm)
- Krav Maga (*Israeli Military hand-to-hand combat/Defensive tactics system*)

Duties:

1 – Commander of the Counter-Terror School's International Training Section.  
Responsibilities include developing and delivering Counter-terror training to Special Forces units from International countries, including the United States (*Army Special Forces, Delta, Marines Special Operations Command, Rangers, Asymmetrical Warfare Group*) that attend the I.D.F. Counter-Terror School for specialized training in preparation for high risk operational deployments such as Iraq and Afghanistan. Responsibilities also included liaising and communicating with International Special Forces Unit Commanders to assess their Unit's operational requirements and develop training according to those requirements, and representing the Counter-Terror School at international joint forces training missions.

**MILITARY SERVICE:**

*(Cont'd)*

Counter-Terror Unit and Counter-Terror and Special Operations School duties continued:

- 2 – Lead instructor on the Designated Hostage Rescue Take-over Units Instruction Section. Responsibilities include delivering first phase training (new recruits) and second phase training (revision and recertification) to the I.D.F.'s Designated Hostage Rescue Take-over units (unit 767 Sayeret Matkal, unit S13 Navy SEALs, and unit 7707 Lotar Eilat) in all areas of Counter-Terror and Hostage Rescue operations.
- 3 – Assigned to the C.T.S.O. School's Chief Instruction and Research and Development Section. Responsibilities include researching and developing Counter-Terror tactics, methodologies, and strategies and to integrate those elements into the School's teaching mandate by developing lesson plans and training the school's Counter-Terror instructors. Some of the subjects I was responsible for developing and integrating into the Israeli Defense Force's teaching mandate which all I.D.F. Special Forces units are trained in today include: Immediate Rapid Deployment for Active Shooter/Terror attack in open terrain, Combat in Built-up/Urban Areas, the use of the ballistic shield in urban warfare, Single operative Counter-Terror Combat Tactics. Responsibilities also include the assessment of current operational tactics used by all I.D.F. Special Forces units and to evaluate the success ratios of those tactics during operational deployments.
- 4 – Krav Maga instructor. Responsible for developing tactics for Special Forces units with mission specific tasks that require the use of empty handed/unarmed combat strategies. Responsibilities also include training the C.T.S.O. School's Krav Maga instructors.
- 5 – Team Leader on the Operational Counter-Terror Unit. Deployments include Direct Action missions, Active Shooter incident response, high-risk entries and searches of terrorist strongholds, high-risk arrests, and covert infiltration intelligence gathering operations throughout various regions in Israel including the Gaza Strip, the West Bank, and active border points.

- Achievements:**
- Received two Commendation Awards for Outstanding Service from two separate Special Ground Forces Commands for my work in developing and enhancing Counter-Terror methodologies and tactics for the Israeli Special Forces and for exceptional service in commanding the C.T.S.O. School's International Training Section.  
*-Selected among 1500 nominated soldiers from the Ground Forces Command.*
  - Participated in and led counter-terror and direct action missions targeting active terror organizations/cells and terrorists including counter guerrilla operations, covert infiltration into hostile environments to conduct various operations, immediate rapid deployment for active terror attacks, high-risk entries, searches, and arrests, dynamic entries, secure/stealth searches.
  - Developed specialized training programs in the subject matters of Counter Terror Warfare, Hostage Rescue, Tactical Firearms Manipulation and Shooting, and Krav Maga and delivered this training to thousands of soldiers from the Israeli Special Forces, the United States of America Special Forces, and other foreign Nations Special Forces Units.

## **CERTIFICATIONS AND SKILLS:**

LANGUAGES: Fluent in English, Hebrew, and French

### **MEDICAL EMERGENCY FIRST RESPONDER CERTIFICATION:**

-Certified in Emergency First-Aid and CPR through the Canadian Red Cross Society

### **POLICE TACTICAL OPERATIONS CERTIFICATION:**

-Basic Tactical Orientation Course (Provincial Tactical Officer Qualification)  
Ontario Power Generation Nuclear Response Force (Ontario, Canada)  
-Special Weapons and Tactics and Hostage Rescue Qualification Course  
Criminal Justice Training Center – Macomb County Police Academy (Michigan, U.S.A.)

### **POLICE USE OF FORCE AND TACTICAL INSTRUCTOR CERTIFICATION:**

-Certified Provincial Use of Force Instructor – Ontario Police College  
-Qualified Use of Force and Tactical Instructor – Atlantic Police Academy  
-Certified Police Defensive Expandable Baton Instructor – Armament Systems and Procedures (ASP)  
-Certified Police Tactical Handcuffing Instructor – Armament Systems and Procedures (ASP)  
-Certified Instructor for Defensive Tactics, Expandable Baton, and Tactical Handcuffing – PPCT Systems  
-Qualified and approved Use of Force Instructor for the private security field – Ontario Provincial Police

### **UNARMED COMBAT / MARTIAL ARTS EXPERIENCE:**

-Over 30 years of extensive training and instructing experience in:

- Krav Maga (*Israeli Military Close Quarters Defensive Tactics System*) – 1<sup>st</sup> degree black belt
- Combat Hap Ki Do – 1<sup>st</sup> degree black belt
- W.T.F. Tae kwon Do – 1<sup>st</sup> degree black belt
- Jeet Kune Do

### **FIREARMS CERTIFICATION AND EXPERIENCE:**

-Possess a valid Canadian Firearms license – possession and acquisition for restricted and non-restricted firearms  
-Certified Law Enforcement Tactical Handgun Instructor – SIGARMS Academy  
-Certified Law Enforcement Armorer for SIG semi-automatic pistols – SIGARMS Academy  
-Qualified Range Safety Officer – Atlantic Police Academy  
-Qualified Firearms Instructor – Chief Firearms Office / Ontario Provincial Police  
-Qualified and approved Use of Force and Firearms Instructor for the Armored Car and Armed Guard field – Chief Firearms Office / Ontario Provincial Police  
-Extensive knowledge and experience in the instruction and use of various firearms and weapons for combat and self-defense including:

- Assault Rifles – Colt M-16/A1 / AR-15 / M4, Tavor, AK-47
- Sub-machine guns – HK-MP5, Uzi, mini/micro Uzi
- Shotguns – Remington 870, 12 gauge
- Handguns – Glock 17/22, Sig-Sauer P226/228

## **PROFESSIONAL ACCOMPLISHMENTS:**

### **➤ ONTARIO POLICE COLLEGE**

- Subject Matter Resource to the Ontario Police College instruction sections on various subject matters related to tactics and strategies that are taught to Police recruits.
- Assisted in the enhancement of the High Risk Building Entry and Search program currently taught to Police recruits at the Ontario Police College.

### **➤ CANADIAN TACTICAL OFFICERS ASSOCIATION (CTOA)**

- Appointed as the Managing Director of the Canadian Tactical Officers Association.
- Provide training to the Police Tactical and Uniform Patrol community across Canada.
- Media spokesperson for the CTOA. Made numerous interview appearances on various news programs to provide insight on several high profile Police incidents across Canada and Police Use of Force and Tactical training and deployment. Appearances include:
  - CTV News: interviewed on Police shooting incidents, Explosive Forced Entry, and Use of Force training and deployment.
  - Global Television's Investigative news program 16x9: interviewed on training and deployment of the Police Patrol Rifle.

### **➤ ACTIVE SHOOTER INTERVENTION FOR POLICE**

- Developed a specialized Active Shooter Intervention methodology for Police services. This methodology is based on the Active Shooter/Terror Attack Intervention methodology used by the Israeli Defense Force which I was responsible for enhancing as well as developing several of the tactical applications implemented within the methodology.

This methodology is a court defensible best practices system structured on North American Use of Force policies. I delivered this program to all the Special Forces Units from the United States that attended the IDF Counter Terror School in Israel for training as well as to many Police Services and Units across North America, all of which have either completely replaced their Active Shooter Intervention program with mine or have implemented many of the tactics and strategies from my program into their current Active Shooter protocols.

- To date, trained thousands of Special Forces Soldiers, Police Tactical/SWAT Officers, Uniform Patrol Police Officers, Customs Officers, Tactical and Armed Security Officers, Close Protection Agents/Bodyguards, and Instructors in all those fields from various Countries around the world including Canada, the United States, Israel, and others.
- Appeared on numerous media resources in the capacity of an expert on Terrorism, Use of Force, and other Police, Military and Security related issues. Appearances include:
  - Global News: interviewed on hostage takings, hostage rescue and Police Use of Force training.
  - Discovery Channel: interviewed and provided an in-depth analysis on the terror attacks of September 11/2001 in New York City.
  - CTV News: interviewed on the Beslan School Hostage Crisis in September 2004.

Israeli Defense Force Special Forces Command Counter Terror Unit Operator and Instructor  
Qualification course graduation Diploma presented to Nir Maman, July 2007.

**"מלמד יחי למלחמה ונתת קשת מתושה זרעותי"**  
**(שמאל ב' ל"ב, ל"ה)**

**הצאת למעודה ב"י**

<u>יניב ניר ממן</u>	<u>סמ"ר</u>	<u>[REDACTED]</u>
שם	דרגה	מ.א.

**סיים בהצלחה**

**מסלול מש"ק לוס"ר**

**יולי '07**

<b>סג"ל</b>	<b>[REDACTED]</b>	<b>וס"ן</b>	<b>[REDACTED]</b>
<b>מפקד ביח"ס ולזט"ר קנ"צ</b>		<b>סגן מפקד ביח"ס ולזט"ר קנ"צ</b>	

Israeli Defense Force Ground Forces Special Qualifications Command  
Award for Outstanding Service presented to Nir Maman, April 2009.



# תעודת הצטיינות

סמ"ר יניב ממון

בהוקרה וזעזוע

על בחירתך כמצטיין קחצ"ר

ביום העצמאות ה-61 למדינת ישראל

י"שר כח!

אריק אלעזר, אל"מ  
מפקד המרהו"ם

יום העצמאות התשס"ט  
אפריל 2009



Israeli Defense Force Ground Forces Infantry and Paratroopers Command  
Award for Outstanding Service presented to Nir Maman, April 2009.



“בחוכמתך ותבונתך עשית לך חיל”  
(יחזקאל כ"ח ד')



מפקדת קצין חי"ר וצנחנים ראשי



# תעודת הצטיינות



מוענקת בזאת

לסמ"ר ממון יניב



על מצויינות, מסירות,



דוגמא אישית



ופועלך בחיל.



תא"ל יוסי בנר  
קצין חי"ר וצנחנים ראשי

22 אפריל 2009  
כ"ח בניסן התשס"ט



## ATLANTIC POLICE ACADEMY

Les Chipperfield, Executive Director  
P.O. Box 156  
Slemon Park, PEI Canada C0B 2A0

Location: 66 Argus Street

Tel: 902 888 6704  
Fax: 902 888 6725

File: 314

July 14, 2004

### RE: Nir Maman - Police Instructor Qualifications

This is to certify that Nir Maman is a Sworn Provincial Police Constable and Instructor with the Atlantic Police Academy, and has been since May 26, 2003.

Mr. Maman is a qualified instructor in the following areas:

**USE OF FORCE:** Defensive Tactics  
Impact Weapons - expandable and straight baton  
Tactical Handcuffing  
O.C. Spray

**FIREARMS:** Basic, advanced, and tactical shooting for;  
Handgun - Glock 17, SIG 226 9mm and 40 caliber  
Sub-machine gun - HK MP-5 9mm  
Assault Rifle - Colt AR-15/M4 Carbine 9mm and 5.56mm  
Shotgun - Remington 870/12 guage

### **TACTICAL OPERATIONS:**

Basic and Advanced Tactical Operations  
Hostage Rescue Operations  
Building containment, assault, entry, and searching  
Critical Intelligence Gathering  
Immediate Rapid Deployment/Active Shooter Intervention  
High-Risk vehicle takedown and High-Risk Subject Arrest

Sincerely,

A handwritten signature in black ink, appearing to read "Les Chipperfield".

Les Chipperfield  
Executive Director

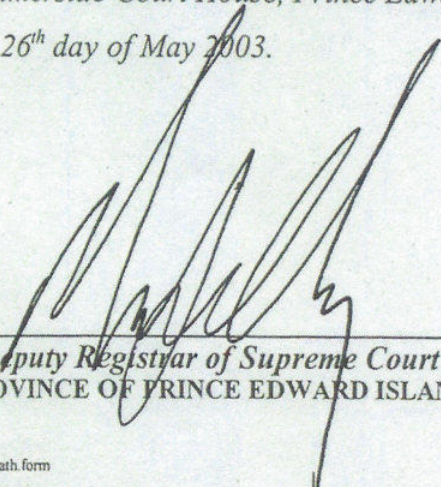


*Atlantic Police Academy*  
*Stemon Park, Prince Edward Island*

*I, Nir Maman, having been appointed a Provincial Police Constable for Prince Edward Island, do swear that I will truly, faithfully, and impartially perform the duties appertaining to the said office according to the best of my skill and ability.*

**SO HELP ME GOD**

**SWORN TO BEFORE ME** *at the*  
*Summerside Court House, Prince Edward Island*  
*the 26<sup>th</sup> day of May 2003.*

  
\_\_\_\_\_  
**Deputy Registrar of Supreme Court**  
**PROVINCE OF PRINCE EDWARD ISLAND**

  
\_\_\_\_\_  
**Signature**

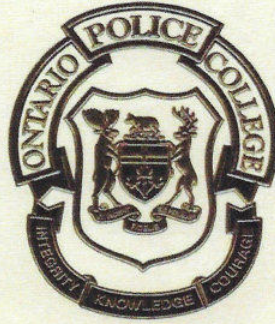
## Paskenta Band of Nomlaki Indians Tribal Police Department

### Oath of Office

*I, do solemnly swear, that I will support the Constitution of the United States, the Constitution and laws of the Paskenta Band of Nomlaki Indians and the Constitution and laws of the State of California, that I will bear true faith and allegiance to the same, and defend them against enemies, foreign and domestic, and that I will faithfully and impartially discharge, the duties of a peace officer, to the best of my ability, so help me God.*

Officer's Printed Name: <i>NIR MAMAN</i>	Officer's Signature: <i>[Handwritten Signature]</i>
Chief or Deputy Chief's Signature: <i>[Handwritten Signature]</i> 6-6-14	





THE ONTARIO POLICE COLLEGE WITH APPROVAL OF  
THE MINISTER OF COMMUNITY SAFETY AND CORRECTIONAL SERVICES,

PROVINCE OF ONTARIO,

HAS CONFERRED UPON

*Nir MAMAN*

THE ONTARIO POLICE TRAINING SYSTEM DIPLOMA  
ATTESTING TO SUCCESSFUL COMPLETION OF THE

*USE OF FORCE TRAINER COURSE*

*August 31, 2012*



*W. Stephen*  
A/DIRECTOR - ONTARIO POLICE COLLEGE

**ONTARIOPOWER**  
GENERATION

**CERTIFICATE OF ACHIEVEMENT**  
**NUCLEAR SECURITY RESPONSE TEAM**



This is to Certify that

*Nir Maman*

has successfully completed  
Basic Tactical Orientation Course 1201  
and has obtained the  
Nuclear Response Force Qualification

Paul Nadeau  
Vice President Nuclear Security  
Ontario Power Generation

April 26, 2012



**DEPARTMENT OF THE ARMY**  
D COMPANY, 2<sup>d</sup> BATTALION, 1<sup>st</sup> SPECIAL WARFARE TRAINING GROUP (AIRBORNE)  
UNITED STATES ARMY JOHN F. KENNEDY SPECIAL WARFARE CENTER AND SCHOOL  
FORT BRAGG, NC 28310-5000

AOJK-GPB-SD

14 May 2009

MEMORANDUM FOR RECORD

SUBJECT: Letter of Recommendation for SGM Nir Maman  
(Israeli Defense Force, Special Forces Counter-Terror  
and Special Operations School Section Commander and  
Counter-Terror Warfare Instructor)

1. In Mar of 2009 I attended a Small Unit Exchange with the IDF CT School at Camp Adam Israel. My counterpart was SGM Nir Maman. He was able to clearly articulate training methodology and mindset of the Israeli CT Operator. More importantly he was able to clarify why certain techniques were developed to combat terrorists in the 21<sup>st</sup> century. His hands on training approach was easy, straight forward, and made learning new techniques in a condensed time period effective.
2. SGM Nir Maman's explanation and practical application of the active shooter protocols were dynamic and enlightening. This technique and methodology has been adopted by many top tier counter terrorist organizations and law enforcement elements around the world. I would recommend that any organization that may be faced with a terrorist threat needs to learn this mindset and more importantly how to apply the dynamic techniques necessary to win in an active shooter scenario. Even for the most experienced CT Operator his explanation and methodology was truly enlightening and a good reminder of the basics that are often overlooked by advanced Operators.
3. SGM Nir Maman's Krav Maga combative training was the best I have seen in the last 27 years I have served in Special Forces. Typically the Krav Maga demonstrated at Dojos in the US are watered down, mixed disciplines, or very modified versions of the Krav Maga System. The IDF CT version Krav Maga that Nir taught was simple to comprehend, simple to exercise and perform, and most importantly taught the Operator proper combat fighting mindset to deal with relevant fighting scenarios.



**DEPARTMENT OF THE ARMY**  
D COMPANY, 2<sup>d</sup> BATTALION, 1<sup>st</sup> SPECIAL WARFARE TRAINING GROUP (AIRBORNE)  
UNITED STATES ARMY JOHN F. KENNEDY SPECIAL WARFARE CENTER AND SCHOOL  
FORT BRAGG, NC 28310-5000

SUBJECT: Letter of Recommendation for SGM Nir Maman  
(Israeli Defense Force, Special Forces Counter-Terror  
and Special Operations School Section Commander and  
Counter-Terror Warfare Instructor)

4. SGM Nir Maman's Hostage Rescue CQB training starts with active shooter protocols and culminates with detailed plans to execute HR Mission profiles which was absolutely spot on tactics to limit threat reaction time and allow a dominate exchange of control from terrorist to rescuer.

5. I recommend that any Top Tier Military or Law Enforcement unit schedule Nir at the earliest opportunity to train his techniques. It will serve as an eye opener to the most experienced Operators and will enlarge the tool box from which Operators draw from to overwhelm a threat and save lives.

6. Questions pertaining to this recommendation should be addressed to the undersigned at 910-432-9771 or [gouldp@soc.mil](mailto:gouldp@soc.mil), [peter.a.gould@us.army.mil](mailto:peter.a.gould@us.army.mil).

A handwritten signature in cursive script that reads "Peter A. Gould".

PETER A. GOULD  
SGM USA  
Company Sergeant Major



**UNITED STATES MARINE CORPS**  
HEADQUARTERS AND HEADQUARTERS SQUADRON  
MARINE CORPS AIR STATION IWAKUNI, JAPAN  
PSC 561 BOX 1862  
FPO AP 96310-0019

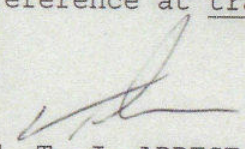
IN REPLY REFER TO:  
12000  
HADM  
8 Dec 09

From: Commanding Officer, Headquarters and Headquarters Squadron  
To: Whom It May Concern

Subj: **ACTIVE SHOOTER INTERVENTION TRAINING**

1. It is with great privilege that I write to you in recommendation of Active Shooter Intervention Training held by Mr. Nir Maman. The training we received here at Marine Corps Air Station Iwakuni, Japan was far beyond expectations. Mr. Maman and his associate came to the location and gave lasting and meaningful training that benefited all that were involved. The class was professional; the shooting at the range was conducted safely and was very meaningful in results. The class focused on an "active shooter". The class taught how to dispatch shooters in a time sensitive manor while stopping or minimizing civilian losses. This class can be tailored to the expert in the field or to the less experienced warriors.

2. I would highly recommend Active Shooter Training held by Mr. Maman. As a combat veteran, I know what it takes to stay alive. This training saves lives and is a must for any unit about to deploy to a combat zone. If you have any question concerning the training, I can be used as a reference at [tray.ardese@usmc.mil](mailto:tray.ardese@usmc.mil) or DSN 253-4670.

  
Lt. Col. T. J. ARDESE



**U.S. DEPARTMENT OF JUSTICE**  
**Federal Bureau of Investigations**

July 8, 2014

Re Nir Maman

To whom it may concern,

I am writing this letter of recommendation supporting Nir Maman's application for a Special Skills Visa. I came into contact with Mr. Maman when he was contracted to provide a Counter Terror/Active Shooter Response, Train the Trainer Course for the Federal Bureau of Investigation (FBI) Newark Division SWAT Team. Mr. Maman's training is cutting edge and I do not believe available anywhere else in the United States.

I have been a Special Agent of the FBI for the past 24 years, and have been a member of the FBI's SWAT program from 1996 to the present. I served as the SWAT Senior Team Leader (STL) for the Newark Division from 2003 until 2011 when I received a transfer to the Jacksonville Division where I am currently the STL for that team. I have attended many active shooter response schools. It is a testament to Mr. Maman that of all the training I have received, I believe his methods are the most practical and beneficial to responding law enforcement.

In today's law enforcement environment the tactical expertise which Mr. Maman possesses and shares is a rare commodity. Accordingly, it is without reservation that I recommend Nir Maman for the issuance of a Special Skills Visa.

Please note that the applicable Government Standards of Conduct require me to advise you that the information provided in this letter of recommendation is based solely on my personal knowledge of Mr. Maman and should not be construed as the official view of the FBI.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Raymond F. Lovett", is written over a horizontal line.

Raymond F. Lovett  
SWAT Senior Team Leader  
FBI, Jacksonville



*Toronto Police Service*  
**INTERNATIONAL POLICE OPERATIONS**

**CERTIFICATE OF APPRECIATION**

**NIR MAMAN**

**FOR YOUR INSTUCTION ON RECOGNITION OF EXPLOSIVES AND  
SUICIDE BOMBERS DURING THE TORONTO POLICE SERVICE  
INTERNATIONAL POLICE OPERATIONS DEPLOYMENT TRAINING**

**2012 APRIL CLASS**

A handwritten signature in blue ink, appearing to read "Bill Vollmar".

P.C. BILL VOLLMAR #8428  
TPS IPO COORDINATOR



Federal Law Enforcement Training Center  
U. S. Department of Homeland Security  
1131 Chapel Crossing Road  
Glynco, Georgia 31524

To: Nir Maman

From: Richard A. Scott  
Senior Instructor EOD/TAB

Date: June 15, 2009



Homeland  
Security

Subject: Terror Attack Active Shooter Immediate Intervention Course

Dear Nir,

I would like to take this time to offer thanks for the outstanding course you provided us on Terror Attack / Active Shooter Immediate Intervention. It was one of the most intense courses I have ever attended and proved to be worth every moment.

This course presented key elements necessary to saving lives during an Active Shooter attack that are presently missing in the Law Enforcement community. As well, this course taught the necessary mindset and tactics to help Police Officers drastically enhance their chances for surviving a deadly force encounter with an active threat.

Your unsurpassed professionalism and integrity in training was unwavering throughout the duration of this course and your level of instruction was excellent.

Specialists of your high caliber are rare. Your level of real world experience became readily apparent to all in attendance. You demonstrated an intricate understanding of the threat an Active Shooter truly poses to society.

Because of the way your training is implemented and the rare knowledge you bring to the table it should be expected that you will continue to "set the standard" for the Law Enforcement training community.

I have no loss for words when speaking to others when it comes to the quality, effectiveness, and reliability regarding your training.

Thank you again for the fantastic training experience.

//Signed

Richard A. Scott  
Senior Instructor, Enforcement Operations Division EOD/TAB  
Federal Law Enforcement Training Center  
(912) 267-2100



State of New Jersey  
OFFICE OF THE ATTORNEY GENERAL  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF STATE POLICE  
POST OFFICE BOX 7068  
WEST TRENTON NJ 08628-0068  
(609) 882-2000

JON S. CORZINE  
Governor

ANNE MILGRAM  
Attorney General

COLONEL JOSEPH R. FUENTES  
Superintendent

February 18, 2008

Mr. Nir Maman  
Krav Maga Israel, LLC  
127 Route 206, Unit 9  
Hamilton, NJ. 08610

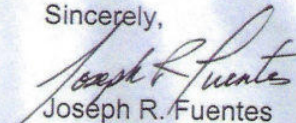
Dear Mr. Maman:

On behalf of the New Jersey State Police, I want to extend my personal gratitude to you for providing my academy staff with the exceptional Israeli Counter Terror and Rapid Deployment Tactics Course. This highly effective course of instruction was held at the Mercer County Range, Mercer County, New Jersey, from September 10-12, 2007, and allowed the New Jersey State Police to take part in training that will further enhance our current firearms capabilities.

It is important that our tactics continually evolve so our members are prepared to support modern law enforcement's mission to provide homeland and hometown protection to the citizens of this state. The Israeli Tactical Shooting system is a cutting edge, best practices training course that's geared towards ending hostile confrontations in a quick and efficient manner that limits collateral damage to innocent bystanders and police.

The division and the academy staff look forward to continuing this partnership and working with you in the future.

Sincerely,

  
Joseph R. Fuentes  
Colonel  
Superintendent

mm



New Jersey Is An Equal Opportunity Employer  
Printed on Recycled Paper and Recyclable



Detective Steven E. Hayden  
New York City Police Department – Emergency Service Unit

August 01, 2011

**RE: Active Shooter Intervention training by Nir Maman**

To whom it may concern;

This letter reflects upon the Active Shooter Intervention training for police conducted by Nir Maman. I am currently a tactical instructor for the N.Y.P.D. Emergency Service Unit with over 20 years of active law enforcement duty including patrol and tactical operations, in addition I am a veteran of the United States Military Special Forces with operational tours in Afghanistan. I have attended this course conducted by Nir Maman on two occasions. This training presented Israeli law enforcement/military response to active shooter incidents and presented several elements currently missing in the North American Law Enforcement community in relation to addressing this threat. I will attempt to compare its techniques, tactics and procedures to the current trends in North American Law Enforcement regarding response to the same.

The overwhelming response to the question of how to handle an active shooter situation by North American Law Enforcement is to form a team at the location of the incident and clear the target with the use of tactical formations and systematic searches. This approach is driven by the concept of Officer Safety, not the concept of the fastest possible mitigation of the incident in order to save the greatest number of innocent lives. The most critical element of an incident of this nature is **TIME**, the longer it takes to locate and engage the shooter, the greater the loss of life. Being a Police Officer is a dangerous profession, that said, the individual Officer has a duty to act to save innocent life without delay and if alone without backup. To wait at the scene of an active shooter as gun fire falls defenseless unarmed innocent civilians is unforgiveable, it would be a decision that Officer will be haunted by for the rest of their life. The armed responder is the only instrument that can stop the killing; it is imperative that the response is immediate and committed to ending the incident. The concept of the police being out gunned is the response of the timid, are you not better equipped to fight a gunman than the unarmed victims that fall before them? Your safety cannot be allowed to be the main consideration in your response to this type of incident; you must get in the fight and save those who cannot save themselves.

The Israeli response to an Active Shooter incident is swift and committed, their tactics and techniques have been forged in blood. As a society, Israel has experienced the greatest number of active shooter incidents the world over, they have learned what they practice at the cost of human life. The methodology taught by Nir Maman are the current most evolved tactics used to combat the Active Shooter in Israel; they are designed to save the maximum number of innocent lives while enhancing the officer's ability to mitigate threats in a complex and stressful operating environment.

This methodology reverse engineers the response structure used in North America and delivers a far more effective end result. In North America, although the spoken rule amongst the Law Enforcement community is 'the Officer will engage the situation on their own if need be', there is no safe methodology designed for single Officer response and in addition SOP's still dictate multiple Officer response and formations. The use of multiple Officers and formations is a perception of elevated safety and effectiveness, however Nir's course quickly exposes the weaknesses of this thinking that counter acts the objectives of both saving innocent lives and Officer safety.

Any type of formation work (for as little as two Officer teams up to larger teams) will only be effective in a controlled environment. An Active Shooter environment is the most uncontrolled environment that exists and will lend itself to issues such as tactical disconnect between formed up Officers. Not only will any type of a formation automatically slow down the response initiative (as real time assessment based information has to transfer through the team nucleus which must adapt collectively on an ongoing basis), but if the formation is disrupted in any way (such as an Officer down predicament) the entire formation comes to a halt until it re-collects, re-establishes individual task control within the team, and then proceeds. Even if the delay is mere seconds, that is a potential for more executed victims.

The Israeli methodology begins with single Officer response tactics and strategies which become the foundation for a multiple Officer team where any additional Officers blend seamlessly into the dynamic. This innovated platform automatically solves two issues. First it provides the most effective approach for single Officer response, it allows for an effective deployment of a single Officer should the severity of the circumstances call for it. Second, it allows for a more effective 'team' operation in an uncontrolled environment. Should the formation encounter a disconnect of any sort (such as an Officer down) the single Officer based team dynamic is not hindered in any way nor is it delayed.

In addition, I found this methodology to provide a much more tactically sound and safer outcome for Officers responding to a situation where they may encounter multiple dedicated, skilled, and hostile threats. The tactics used are simple and direct, complicated plans and techniques tend to fail under the stress of actual combat. This methodology does not deviate at all from the responsibility of the North American Law Enforcement community, it conforms fully to the policies and legal requirements of Use of Force criteria and litigation.

The Israeli response to Active Shooter Incidents is a fast, effective and tested best practices system. Any Police Department would do well to learn this methodology and its tactics and put them into practice, train for your next fight, it will come.

Nir Maman is a committed teacher and professional. As an instructor, Nir is polished and engaging, the intensity, experience, and knowledge he brings to his teaching is refreshing. The methodology and tactics are easily learned and retained with practice; the most important element is the mental attitude and mind set instilled into the individual Officer in this training. The current situation in North America calls for an absolute commitment by Law Enforcement to prepare to fight our enemy in our streets, schools and work places with the dedication and focus to win at all costs.

Sincerely,

//signed//

Detective Steven E. Hayden  
New York City Police Department  
Emergency Service Unit  
Tactical Training Section

# Western Chester County Emergency Response Team

Downington Police  
Chief James McGowan III

Caln. Twp. Police  
Chief Brian Byerly

Brandywine Regional Police  
Chief Mark Kocsi

East Fallowfield Police  
Chief Peter J. Mango



West Brandywine Police  
Chief Walter Werner

Coatesville Police  
Chief J. Canale

Parkeburg Police  
Chief Brian Sheller

February 28/2011

To: Nir Maman  
CT 707 - Israeli Krav Systems Inc.

RE: Dynamic Response Counter Ambush Shooting, Active Shooter Intervention,  
and Secure Search Training.

Mr. Maman,

I wanted to express my gratitude for offering the Active Shooter Intervention, Dynamic Response Shooting, and Secure Search training on February 23-24, 2011 in Hamilton New Jersey hosted by the Mercer County Police Academy. You are by far one of the best instructors I have had the privilege from which to learn. Your knowledge of armed and unarmed combat is astounding. All the material was presented in a clear and concise manner.

Your methodology in the world of counter terrorism and tactics should be standard training for all those in public service. My training philosophies will certainly change from this point on. I believe that your training will have a serious positive impact on our abilities to deal with Active Shooter incidents. What I found equally as valuable was your operational experience in this subject matter. It is one thing to train based on principles handed down from your predecessors, but in this case you are at the tip of the spear. Your basis for the tactics and information taught is from real world experience in one of the world's most violent places. As an instructor I can say that we would be doing a great disservice to those we are charged to train if we did not take your subject matter expertise to heart.

I thank you, Nir Maman, for your dedication and professionalism. The training was a turning point for me and those in my charge. You have clearly made an impact on our agency that will most likely result in saving lives.

Respectfully,

//Signed//

Sgt. Kevin Bernard  
Caln Township Police Department  
Team Leader for WCC Emergency Response Team  
(610) 383-1821 ext. 128

UNITED STATES MARSHALS SERVICE

# CERTIFICATE of APPRECIATION



Presented to

Instructor Nir Maman

*For your contributions to the mission of the United States Marshals Service  
Israeli Tactical Shooting Immediate Rapid Deployment and Counter-Terror Engagements  
September 7, 2007*

Honorable James T. Plousis  
United States Marshal

October 17, 2007

Date

CONSULATE GENERAL OF ISRAEL  
TORONTO

180 BLOOR ST. WEST, SUITE 700  
TORONTO, ONTARIO M5S 2V6  
Telephone: (416) 640-8500  
Fax: (416) 640-8555  
Website: <http://toronto.mfa.gov.il>



הקונסוליה הכללית של ישראל  
טורונטו

June 14, 2010

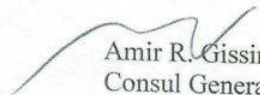
Mr. Nir Maman  
International Defense Force  
800 Steeles Avenue West  
Unit B-10, Suite 178  
Thornhill, ON L4J 7L2

Dear Mr. Maman,

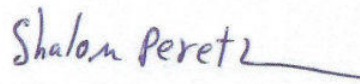
On behalf of the Consulate General of Israel, I would like to express our sincere thanks for your assistance during Prime Minister Benjamin Netanyahu's recent visit. As you may be aware, this was the first visit to Toronto by an Israeli Prime Minister in 32 years, and we were very proud that he came here and addressed this year's Walk for Israel rally.

However, such a visit requires a great deal of planning and attention to security matters. It would not have been possible without the expertise and dedication of professionals like yourself who helped to ensure its success. For this, we are most grateful, and once again convey our thanks for all your efforts.

Sincerely,

  
Amir R. Gissin  
Consul General

Sincerely,

  
Shalom Peretz  
Head of Security

In November 2008 the Israeli Defense Force's Counter-Terror Unit and Counter-Terror and Special Operations School (Unit 707), was featured in Special Operations Report Magazine. This magazine is a closed publication exclusive to the Global Military and Police Special Operations Community. Sergeant-Major Nir Maman shown on the cover of the issue (on the right in the standing position) was selected to be the spokesperson and representative of the unit for the feature.



# **Exhibit D**

1 DARREN S. ENENSTEIN (SBN 195894)

Email: *dse@enensteinlaw.com*

2 NED M. GELHAAR (SBN 163185)

Email: *ngelhaar@enensteinlaw.com*

3 NIMA KAMALI (SBN 294401)

Email: *nkamali@enensteinlaw.com*

4 JOY D. LLAGUNO (SBN 311867)

Email: *jllaguno@enensteinlaw.com*

5 **ENENSTEIN PHAM & GLASS**

12121 Wilshire Boulevard, Suite 600

7 Los Angeles, California 90025

Tel.: (310) 899-2070

8 Fax: (310) 496-1930

9 Attorneys for Plaintiff STEPHEN RUSSELL

10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12 **STEPHEN RUSSELL**, an individual,

Case No. 4:18-cv-06691-RS

13 Plaintiffs,

**PLAINTIFF STEPHEN RUSSELL'S  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS, SET ONE TO CT707  
ISRAELI KRAV SYSTEMS, INC.**

14 vs.

16 **NIR MAMAN**, an individual; **CT707**

17 **ISRAELI KRAV SYSTEMS, INC.**,

an Ontario corporation; **GEORGE**

18 **AKKELQUIST**, an individual; **DFW**

19 **METROPLEX TRAINING**

**ACADEMY**, a New York entity form

20 unknown, and **DOES 1 through 20**,

21 inclusive,

22 Defendants.

1 **PROPOUNDING PARTY: Plaintiff STEPHEN RUSSELL**

2 **RESPONDING PARTY: Defendant, CT707 ISRAELI KRAV SYSTEMS,**  
3 **INC.**

4 **SET: ONE (1)**

5 Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff, Stephen  
6 Russell, ("Russell") hereby requests that Defendant, CT707 Israeli Krav Systems,  
7 Inc. ("CT707") identify and product the originals or best available copies of the  
8 writings and other things described below for inspection and copying within the time  
9 and in the manner prescribed by the Federal Rules of Civil Procedure. The place for  
10 inspection shall be the law offices of Enenstein Pham & Glass, 12121 Wilshire  
11 Boulevard, Suite 600, Los Angeles, California 90025.

12 **DEFINITIONS**

13 1. "YOU," or "YOUR," means CT707 ISRAELI KRAV SYSTEMS,  
14 INC., and any or all of its agents and/or representatives.

15 2. "RUSSELL" means STEPHEN RUSSELL, and any or all of his agents  
16 and/or representatives.

17 3. "COMMUNICATION(S)" means any form of communication or  
18 correspondence whether oral or written between one or more persons, including but  
19 not limited to, letters, memoranda, cards, circulars, bulletins, dispatches,  
20 notifications emails, text messages, recordings of oral conversations blog posts,  
21 information transmitted through social network websites whether produced,  
22 reproduced or stored USB disk drives, data cells or other media or data compilation  
23 from which information can be obtained, including originals, copies (with or without  
24 notes or changes thereon) and drafts, including, but not limited to, papers, books,  
25 letters, tangible things, correspondence, telegrams, cables, telex messages,  
26 memoranda, notes, notations, work papers, transcripts, minutes, reports, recordings  
27 of telephone conversations, or interviews or of conferences, or other meetings,  
28 affidavits, statements, summaries, opinions, reports, studies, work sheets, proposals,

1 contracts, agreements, statistical records, desk calendars, appointment books,  
2 diaries, lists, tabulations, sound recordings, computer printouts, data processing  
3 output and input, microfilms, photographs or negatives thereof, all other records kept  
4 by electronic, photographic or mechanical means, and any or all matter or material  
5 attached or affixed to any of the above.

6 4. "DOCUMENT(S)" means any handwriting, typewriting, printing,  
7 photostating, photographing, photocopying, transmitting by electronic mail or  
8 facsimile, and every other means of recording upon any tangible thing any form of  
9 communication or representation, including letters, words, pictures, sounds, or  
10 symbols, or combinations thereof, and any record thereby created, regardless of the  
11 manner in which the record has been stored.

12 5. "REFER(S)", "RELATED TO," "RELATES TO," or "RELATE TO"  
13 means to constitute, embody, identify, evidence, reflect, record, show, memorialize,  
14 consist of, discuss, describe, mention, concern, consider, evaluate, review, analyze,  
15 report on, support, or bear upon the subject matter of the request.

16 6. "RELEVANT TIME PERIOD" means January 1, 2017 to the present.

17 7. "ENTITY" means any organization, company, and/or corporation,  
18 including any government, public, and/or private organization.

19 8. "SECURITY SERVICES" means any services provided to RUSSELL  
20 RELATED to security, protection, cyber-security, surveillance, counter-  
21 surveillance, threat risk assessment and mitigation, infrastructure and disruptive  
22 environment protection, investigation, intelligence, and/or counter intelligence  
23 services.

### 24 **INSTRUCTIONS**

25 1. This Request for Production covers all responsive  
26 COMMUNICATIONS and DOCUMENTS in your possession, custody or control,  
27 including COMMUNICATIONS and DOCUMENTS that are in the possession,  
28 custody or control of your agents or representatives, unless privileged or exempted

1 from production under federal law.

2 2. For each written response:

3 a. Produce responsive COMMUNICATIONS and DOCUMENTS;

4 b. Produce all electronically stored COMMUNICATIONS and  
5 DOCUMENTS in both hard copy and native format;

6 c. State whether you have produced all responsive  
7 COMMUNICATIONS and DOCUMENTS;

8 d. State all objections to any request with specificity, and if the event  
9 an objection relates only to a part or portion of a request, specify the part or portion  
10 of the response objected to and state whether you have produced or intend to permit  
11 inspection and copying of the remaining parts or portions; and;

12 e. Organize all COMMUNICATIONS and DOCUMENTS and  
13 things produced for inspection, by among other things, labeling the  
14 COMMUNICATIONS and DOCUMENTS and categorizing them to correspond to  
15 the Requests.

16 3. In the event that any COMMUNICATION or DOCUMENT or other  
17 thing called for by any request has been destroyed, discarded, or otherwise disposed  
18 of, that COMMUNICATION or DOCUMENT or other thing is to be identified as  
19 completely as possible, and the following information is to be provided: date of  
20 disposal, manner of disposal, reason for disposal, person authorizing the disposal,  
21 and person disposing of the document or other thing.

22 4. If you claim that the attorney-client privilege or the attorney work-  
23 product doctrine is applicable to any responsive COMMUNICATION or  
24 DOCUMENT, then you shall state with respect to that COMMUNICATION or  
25 DOCUMENT:

26 a. The reason for withholding the COMMUNICATION or  
27 DOCUMENT;

28 b. The date the COMMUNICATION or DOCUMENT was created;

1 c. The identity of the COMMUNICATION or DOCUMENT'S  
2 author, including employment title and description, current address, and telephone  
3 number;

4 d. The identity of each person to whom the COMMUNICATION  
5 or DOCUMENT was sent, including employment title and description, current  
6 address, and telephone number;

7 e. The custodian of the COMMUNICATION or DOCUMENT,  
8 including employment title and description, current address, and telephone number;  
9 and

10 f. A description of the COMMUNICATION or DOCUMENT  
11 sufficient to permit Endurance and the Arbitrators to assess the validity of any  
12 privilege, immunity, or exemption asserted.

13 5. This Request for Production is continuous in nature. If you discover  
14 additional documents called for by this Request, then promptly amend and  
15 supplement your responses and production.

16 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

17 **REQUEST FOR PRODUCTION NO. 1**

18 All DOCUMENTS RELATING to YOUR introduction to RUSSELL.

19 **REQUEST FOR PRODUCTION NO. 2**

20 All DOCUMENTS RELATING to YOUR COMMUNICATIONS with  
21 RUSSELL at any time from YOUR introduction to RUSSELL to the present.

22 **REQUEST FOR PRODUCTION NO. 3**

23 All DOCUMENTS RELATING to the SECURITY SERVICES provided by  
24 YOU to RUSSELL during the RELEVANT TIME PERIOD

25 **REQUEST FOR PRODUCTION NO. 4**

26 All COMMUNICATIONS RELATING to the SECURITY SERVICES  
27 provided by YOU during the RELEVANT TIME PERIOD.

28 ///

1 **REQUEST FOR PRODUCTION NO. 5**

2 All DOCUMENTS evidencing and/or RELATING to an accounting of all  
3 SECURITY SERVICES provided by YOU to RUSSELL during the RELEVANT  
4 TIME PERIOD.

5 **REQUEST FOR PRODUCTION NO. 6**

6 All DOCUMENTS evidencing and/or RELATING to any contracts between  
7 YOU and RUSSELL.

8 **REQUEST FOR PRODUCTION NO. 7**

9 All COMMUNICATIONS RELATING to and/or referencing RUSSELL  
10 from the RELEVANT TIME PERIOD.

11 **REQUEST FOR PRODUCTION NO. 8**

12 All DOCUMENTS RELATING to any payments requested from RUSSELL  
13 by YOU from the RELEVANT TIME PERIOD.

14 **REQUEST FOR PRODUCTION NO. 9**

15 All DOCUMENTS RELATING to any monies paid by RUSSELL to YOU  
16 from the RELEVANT TIME PERIOD.

17 **REQUEST FOR PRODUCTION NO. 10**

18 All COMMUNICATIONS to any subcontractors retained by YOU to provide  
19 SECURITY SERVICES to RUSSELL from the RELEVANT TIME PERIOD.

20 **REQUEST FOR PRODUCTION NO. 11**

21 All DOCUMENTS RELATING to any payments made to third parties to  
22 provide SECURITY SERVICES to RUSSELL from the RELEVANT TIME  
23 PERIOD.

24 **REQUEST FOR PRODUCTION NO. 12**

25 All COMMUNICATIONS between YOU and RUSSELL from the  
26 RELEVANT TIME PERIOD.

27 ///

28 ///

1 **REQUEST FOR PRODUCTION NO. 13**

2 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
3 to RUSELL of any threats against RUSSELL.

4 **REQUEST FOR PRODUCTION NO. 14**

5 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
6 that RUSSELL was in danger.

7 **REQUEST FOR PRODUCTION NO. 15**

8 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
9 that there were threats to RUSSELL's safety.

10 **REQUEST FOR PRODUCTION NO. 16**

11 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
12 of threats against the safety of RUSSELL'S family.

13 **REQUEST FOR PRODUCTION NO. 17**

14 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
15 that RUSSELL's family was in danger.

16 **REQUEST FOR PRODUCTION NO. 18**

17 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
18 that there were threats against RUSSELL'S business interests.

19 **REQUEST FOR PRODUCTION NO. 19**

20 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
21 that RUSSELL's business interests were in danger.

22 **REQUEST FOR PRODUCTION NO. 20**

23 All COMMUNICATIONS between YOU and RUSSELL from the  
24 RELEVANT TIME PERIOD.

25 **REQUEST FOR PRODUCTION NO. 21**

26 All COMMUNICATIONS referring to RUSSELL.

27 ///

1 **REQUEST FOR PRODUCTION NO. 22**

2 YOUR license from the California Bureau of Security and Investigative  
3 Services.

4 **REQUEST FOR PRODUCTION NO. 23**

5 All DOCUMENTS evidencing and/or RELATING to any of YOUR licenses  
6 to provide security services.

7 **REQUEST FOR PRODUCTION NO. 24**

8 All DOCUMENTS evidencing and/or RELATING to any of YOUR licenses  
9 to provide investigative services.

10 **REQUEST FOR PRODUCTION NO. 25**

11 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
12 that there was ongoing unwanted surveillance of RUSSELL by third parties.

13 **REQUEST FOR PRODUCTION NO. 26**

14 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
15 of government investigations of RUSSELL.

16 **REQUEST FOR PRODUCTION NO. 27**

17 All DOCUMENTS evidencing and/or RELATING to YOUR representations  
18 that individuals had active hits out for RUSSELL'S life.

19 **REQUEST FOR PRODUCTION NO. 28**

20 All DOCUMENTS evidencing and/or RELATING to the SECURITY  
21 SERVICES budget estimated by YOU.

22 **REQUEST FOR PRODUCTION NO. 29**

23 All DOCUMENTS evidencing and/or RELATING to whom/where payments  
24 made by RUSSELL were used towards the SECURITY SERVICES.

25 **REQUEST FOR PRODUCTION NO. 30**

26 All DOCUMENTS RELATING to any allegations of misconduct by YOU  
27 from any ENTITY.

28 ///

1 **REQUEST FOR PRODUCTION NO. 31**

2 All DOCUMENTS RELATING to any disciplinary action taken against YOU  
3 by any ENTITY.

4 **REQUEST FOR PRODUCTION NO. 32**

5 All DOCUMENTS RELATING to any investigations into YOU for  
6 misconduct by any ENTITY.

7  
8 DATE: January 17, 2018

ENENSTEIN PHAM & GLASS

9  
10 BY: /s/ Ned M. Gelhaar  
11 Darren S. Enenstein, Esq.  
12 Ned M. Gelhaar Esq.  
13 Joy D. Llaguno, Esq.  
14 Attorneys for Plaintiff  
15 Stephen Russell  
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**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is: 12121 Wilshire Boulevard, Suite 600, Los Angeles, California 90025.

On January 17, 2019, I served the foregoing document(s) entitled: **PLAINTIFF STEPHEN RUSSELL'S REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE TO CT707 ISRAELI KRAV SYSTEMS, INC.**, on the following interested party/ies:

ROD DIVELBISS  
JRA LAW PARTNERS, LLP  
450 Pacific Avenue, Suite 200  
San Francisco, CA 94133

DEK KETCHUM  
LAW OFFICES OF DEK KETCHUM  
900 Veterans Boulevard, Suite 600  
Redwood City, California 94063

*Attorneys for Defendants  
NIR MAMAN and CT707 ISRAELI  
KRAV SYSTEMS, INC.*

*Attorneys for Defendants  
GEORGE AKKELQUIST and DFW  
METROPLEX TRAINING ACADEMY*

**[X] BY PERSONAL SERVICE:** Placing the document(s) listed above in a sealed envelope(s) and by causing personal delivery of the envelope(s) to the person(s) at the address(es) set forth above.

I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed this 17th day of January, 2019, in Los Angeles County, California.

/s/ Omar Rodriguez  
OMAR RODRIGUEZ

# EXHIBIT "1"

# **NIR MAMAN**

## ***CURRICULUM VITAE***

**- Confidential -**

**This document contains sensitive information and is  
intended for addressee only.**

## CURRICULUM VITAE

**NAME:** Nir Maman

**ADDRESS:** 800 Steeles Avenue West      **CONTACT NUMBER:** Canada: (416) 999-2492  
Unit B-10, Suite 178  
Thornhill, Ontario, L4J 7L2  
Canada

**E-MAIL:** nidf@rogers.com

**Federal Security Clearances – Canada:** Government of Canada  
Level 2 – Secret Clearance

**Israel:** Israeli Defense Force / Ministry of Defense  
Level 3 – Top Secret Clearance

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### **Fields / Summary of Experience:**

- **Ontario Power Generation:** Tactical Officer – Nuclear Tactical Response Force Unit
- **Ontario Judicial Service:** Sworn Peace Officer, Use of Force Instructor
- **Atlantic Police Academy:** Sworn Police Constable, Use of Force, Police Tactics, and Tactical operations instructor.
- **Nomlaki Tribal Police Department:** Sworn Police Officer, Tactical Advisor.
- **Canada Border Services Agency (*Immigration Enforcement Division*):** Use of Force Instructor
- **Israeli Defense Force:** Special Forces Command – Counter-Terror Unit and Counter Terror School  
-Operational Team Leader, Section Commander, Lead Instructor in the fields of Counter Terror Warfare, Tactical Shooting, and Krav Maga.
- **Security and Counter Terror Advisor/Consultant**
- **Diplomatic Security Operations:** Organized and supervised protective details for Diplomatic officials of the Israeli Government traveling into Canada.
- **Instructor Qualifications:** Ontario Police College: Provincial Use of Force Instructor  
Atlantic Police Academy: Use of Force and Tactical Instructor  
Israeli Special Forces Counter Terror and Special Operations School:  
-Counter Terror Warfare Instructor  
-Tactical Shooting Instructor  
-Krav Maga Instructor

**PROFESSIONAL EXPERIENCE:**

01/2012 – **NUCLEAR TACTICAL RESPONSE FORCE OFFICER**  
06/2013 ONTARIO NUCLEAR POWER GENERATION, Ontario, Canada

Duties: Responsible for protecting Ontario Nuclear Power Generation stations, assets, and employees from criminal and terror oriented threats geared at theft of sensitive nuclear materials, sabotage, and deliberate hostile attacks. Duties include conducting foot and armored vehicle patrols of protected areas, observation and surveillance detection, conducting searches of personnel and vehicles entering and exiting controlled and protected areas, escorting transports of sensitive nuclear materials, respond to and investigate various alarms, support the Ontario Nuclear Power Generation Security Officers when needed, enforce various laws, statutes, and regulations as required including the Criminal Code of Canada, Canadian Nuclear Security Regulations Act, the Public Works Protection Act, and the Ontario Trespass to Property Act.

Duties also include receiving intelligence briefs on potential or known threats directed at Ontario Nuclear Power Generation interests, and to remain aware and prepared to respond to Active Shooter attacks or Hostage taking incidents.

Qualification for this position included a three month Basic Tactical Qualification/SWAT Course which includes:

- Introduction to and qualification on various Nuclear industry related systems and elements
- Physical protection systems
- Design Basis Threats
- Intelligence security
- Legal Authorities: Criminal Code of Canada, Nuclear Security Regulations Act, Public Works Protection Act, Trespass to Property Act, Arrest authorities, Use of Force authorities, Search authorities, and the Canada Firearms Act
- Crime scene management and evidence preservation
- Report writing and note taking
- Use of Force: Defensive Tactics, Impact weapons/Expandable baton, O.C. spray, Tactical Handcuffing
- Passive and Active subject arrest
- High Risk subject take-down and arrest
- Tactical firearm manipulation and shooting: semi-automatic handgun (Glock 22 .40 caliber) and Assault Rifle (C8/M4 Carbine 5.56mm)
- Chemical munitions
- Protective CBRN equipment
- Less lethal force/Special Impact Munitions: ARWEN
- Tactical communications
- Patrol operations, routine and high risk vehicle stops
- SMEAC/Intelligence gathering/transferring critical information
- Tactical response options planning for stealth operations, hostage rescue, injured person recovery, and Immediate Rapid Deployment/Active Shooter Intervention
- Field craft and open field tactics and searching
- Tactical Response Operations: Containment, stealth/methodical search operations, hostage rescue, and Immediate Rapid Deployment/Active Shooter Intervention
- Dynamic entry, Distraction devices, and mechanical breaching
- Explosives and IED's
- Light armoured vehicle (LAV) operations

**PROFESSIONAL EXPERIENCE:**

05/2011 – **JUDICIAL ENFORCEMENT OFFICER**  
Present ONTARIO JUDICIAL SERVICE, Toronto, Canada

Status: Sworn Peace Officer

Duties:

- Enforce Judicial orders for various government offices including the Attorney General's office.
- Issue summonses to individuals charged under the Criminal Code and Provincial Offences Act for various Police Services in the GTA.
- Use of Force Instructor: Responsible for qualifying all Ontario Judicial Service Peace Officers in all aspects of Use of Force legalities, authorities, and legislation, as well as all Use of Force options and issued defensive weapons/implements including: defensive tactics, expandable baton, O.C. spray, and tactical handcuffing.

11/2009 – **POLICE TACTICS AND USE OF FORCE INSTRUCTOR**  
Present CANADIAN LAW ENFORCEMENT TRAINING COLLEGE, Toronto, Canada

Duties:

Instruct Recruit classes in the Police Foundations accreditation course of the Canadian Law Enforcement Training College.

Courses of instruction:

- Use of Force Legal Authorities, Justification, and Articulation
- Arrest Authorities/Police Powers
- the Criminal Code of Canada
- Use of Force, including: the National and Provincial Use of Force Model, effective communication methods, defensive tactics, subject control and restraint tactics, defensive expandable baton, tactical handcuffing, subject search.

06/2014 – **TACTICAL ADVISOR**  
Present NOMLAKI TRIBAL POLICE DEPARTMENT, Tehama County, California, United States

Status: Sworn Police Officer

Duties:

- Provide assessment and advisory service to the Nomlaki Tribal Police Department on the implementation and application of Tactical/SWAT operations in relation to on going high-risk situations involving the Nomlaki Tribal Police Department.
- Participate in field deployments to conduct Tactical Operations for Nomlaki Tribal Council interests.

**PROFESSIONAL EXPERIENCE:**

*(Cont'd)*

1998 –  
Present

**SECURITY AND COUNTER-TERROR ADVISOR/CONSULTANT**  
INDEPENDENT CONTRACTOR, Global

Duties:

Assist Government, Corporate, and Civilian entities in developing, enhancing, and deploying security protocols designed to protect people, facilities, and assets against criminal and terror oriented threats. Conduct threat risk assessments to determine relevant security threats and to ensure adequate security measures are in place to mitigate those threats. Past clients include: the Nuclear industry, various schools and synagogues in the Toronto Jewish community, Provincial Government facilities, Military units deploying to hostile zones, Global corporations operating in or setting up operations in volatile regions, communities positioned in volatile regions.

05/2003 –  
03/2005

**POLICE TACTICS, USE OF FORCE AND TACTICAL INSTRUCTOR**  
ATLANTIC POLICE ACADEMY, Prince Edward Island, Canada

Status: Sworn Provincial Police Constable

Duties:

Police Tactics, Use of Force and Tactical Instructor for Police Tactical Units, Police recruits, and Nuclear Tactical Response Force Units.

Courses of Instruction:

- Tactical Operations
- Counter-terrorism and Hostage Rescue Operations
- Immediate Rapid Deployment
- Tactical Shooting and Firearms for: Handgun, Sub-Machine gun, Assault Rifle, and Shotgun
- High-risk security and Response Operations
- Intelligence gathering
- High-risk vehicle takedowns
- High-risk arrest, prisoner handling and searching
- Use of Force: Defensive Tactics, Expandable Baton, Handcuffing, O.C./Pepper Spray

08/2005 –  
09/2006

**USE OF FORCE AND ENFORCEMENT OPERATIONS INSTRUCTOR**  
CANADA BORDER SERVICES AGENCY – IMMIGRATION ENFORCEMENT DIVISION  
Greater Toronto Enforcement Center – Toronto, Ontario

Duties:

Deliver Use of Force training to Immigration Canada Enforcement Officers. Training subjects include use of force legal authorities, defensive tactics, arrest procedures, tactical handcuffing, expandable baton, O.C./pepper spray, tactical communication, and incident report writing. Duties also include conducting testing and evaluations on the Immigration Enforcement Officers to ensure operational proficiency on training material.

**PROFESSIONAL EXPERIENCE:**

*(Cont'd)*

1998 –  
Present

**COUNTER-TERROR, TACTICAL OPERATIONS, OFFICER SURVIVAL INSTRUCTOR**

Duties:

Instruct military, police, and security operation forces across North America in various areas of tactical combat, strategies, and operations. Training subjects include: counter-terror and hostage rescue operations, awareness and defense strategies against conventional and unconventional terrorism and guerrilla warfare, suicide bomber identification and interception, urban warfare, counter-ambush tactics, immediate rapid deployment/active shooter intervention, close protection operations, tactical firearms, and hand-to-hand combat/Krav Maga.

Some of the organizations that I currently train or have trained include:

ONTARIO POLICE COLLEGE – POLICE TACTICS / OFFICER SURVIVAL INSTRUCTORS  
ROYAL CANADIAN MOUNTED POLICE – VARIOUS UNITS  
TORONTO POLICE SERVICE – INTERNATIONAL POLICE OPERATIONS (*AFGHANISTAN DEPLOYMENT TEAMS*)  
TORONTO POLICE SERVICE – COMMUNITY ORIENTED RESPONSE AND PUBLIC ORDER UNIT  
TORONTO POLICE SERVICE – DEFENSIVE TACTICS INSTRUCTORS AND FIREARMS INSTRUCTORS  
HALTON REGIONAL POLICE – USE OF FORCE INSTRUCTORS  
HALTON REGIONAL POLICE – TACTICAL RESPONSE UNIT  
PEEL REGIONAL POLICE – TACTICAL AND RESCUE UNIT  
PEEL REGIONAL POLICE – AIRPORT EMERGENCY RESPONSE UNIT  
DURHAM REGIONAL POLICE – TACTICAL SUPPORT UNIT NUCLEAR SECURITY DIVISION  
YORK REGIONAL POLICE – EMERGENCY RESPONSE UNIT  
CALGARY POLICE SERVICE – TACTICAL AND RESCUE UNIT  
OTTAWA POLICE SERVICE – PRIMARY RESPONSE AND UNIFORM PATROL UNIT  
CANADIAN DEPARTMENT OF NATIONAL DEFENSE  
UNITED STATES FEDERAL LAW ENFORCEMENT TRAINING CENTER – TACTICAL INSTRUCTORS  
UNITED STATES FEDERAL MARSHAL SERVICE  
UNITED STATES FEDERAL AIR MARSHAL SERVICE  
UNITED STATES SECRET SERVICE  
UNITED STATES DIPLOMATIC SECURITY SERVICE  
UNITED STATES COAST GUARD – POLICE DIVISION  
UNITED STATES FEDERAL BUREAU OF INVESTIGATIONS – HOSTAGE RESCUE/SWAT TEAM  
UNITED STATES BUREAU OF ALCOHOL, TOBACCO, AND FIREARMS  
UNITED STATES NATIONAL PARKS POLICE – ENFORCEMENT UNIT  
MERCER COUNTY POLICE ACADEMY – FIREARMS AND DEFENSIVE TACTICS INSTRUCTORS (*U.S.*)  
NEW JERSEY STATE POLICE – SPECIAL WEAPONS AND TACTICS UNIT / T.E.A.M.S. (*U.S.*)  
NEW YORK POLICE DEPARTMENT – EMERGENCY SUPPORT UNIT (*U.S.*)  
PENNSYLVANIA STATE POLICE – USE OF FORCE AND TACTICAL INSTRUCTORS (*U.S.*)  
CINCINNATI POLICE DEPARTMENT – SPECIAL WEAPONS AND TACTICS TEAM (*U.S.*)  
CINCINNATI AIRPORT POLICE – EMERGENCY RESPONSE TEAM (*U.S.*)  
TONAWANDA POLICE DEPARTMENT – SPECIAL WEAPONS AND TACTICS UNIT (*U.S.*)  
UNITED STATES MARINE CORPS – SPECIAL OPERATION UNITS (*JAPAN*)  
UNITED STATES AIRFORCE – BASE POLICE AND SECURITY FORCES (*U.S.*)

**PROFESSIONAL EXPERIENCE:**

(Cont'd)

2001 – **CLOSE PROTECTION OPERATIVE AND OPERATIONS COMMANDER**  
Present

Duties:

Working in conjunction with and under the direction of the Israeli General Security Service and the Israeli Consulate, organize and deploy security details for members of the Israeli Government engaged in political functions in Toronto. Some of the dignitaries I was responsible for protecting included:

- Benjamin Netanyahu – Prime Minister of Israel
- Nathan Sharansky – former Deputy Prime Minister of Israel
- Dan Gillerman – Israeli Ambassador to the United Nations
- Kobi Brosh – Israeli Consul General for Toronto
- Shimon Peres – former Israeli Prime Minister and current President
- Ron Huldai – Mayor of Tel Aviv, Israel
- Alon Pinkas – Israeli Ambassador to the United States
- Ranan Gissin – Spokesperson for the Israeli Government

**MILITARY SERVICE:**

- 10/2006 – **ISRAELI DEFENSE FORCE**  
06/2009 **SPECIAL FORCES COMMAND – COUNTER TERROR UNIT (Unit 707)**  
**COUNTER-TERROR AND SPECIAL OPERATIONS SCHOOL (C.T.S.O.)**

Duties: Section Commander, Operational Team Leader, and Lead Counter-Terror Warfare Instructor

11/2006 to 07/2007 – Counter-Terror Warfare Operator and Instructor Qualification course.

Certified as an instructor in the areas of:

- Counter-Terror and hostage rescue operations
- Urban warfare/Close-quarters-combat
- Immediate Rapid Deployment for Active Shooter/Terror Attack Intervention
- Stealth search operations, High risk arrest and prisoner handling
- Aircraft, train, ship, and bus interdiction
- Close-protection operations
- Undercover Counter-terror intelligence operations
- Suicide bomber identification and interception
- Tactical firearms: Semi-automatic handgun (Glock 19/17 9mm, Sig Sauer P228 9mm), Sub-machine gun (Mini/Micro Uzi 9mm), Assault Rifle (AR-15/M4 Carbine 5.56mm)
- Krav Maga (*Israeli Military hand-to-hand combat/Defensive tactics system*)

Duties:

- 1 – Commander of the Counter-Terror School's International Training Section.  
Responsibilities include developing and delivering Counter-terror training to Special Forces units from International countries, including the United States (*Army Special Forces, Delta, Marines Special Operations Command, Rangers, Asymmetrical Warfare Group*) that attend the I.D.F. Counter-Terror School for specialized training in preparation for high risk operational deployments such as Iraq and Afghanistan. Responsibilities also included liaising and communicating with International Special Forces Unit Commanders to assess their Unit's operational requirements and develop training according to those requirements, and representing the Counter-Terror School at international joint forces training missions.

**MILITARY SERVICE:**

*(Cont'd)*

Counter-Terror Unit and Counter-Terror and Special Operations School duties continued:

- 2 – Lead instructor on the Designated Hostage Rescue Take-over Units Instruction Section. Responsibilities include delivering first phase training (new recruits) and second phase training (revision and recertification) to the I.D.F.'s Designated Hostage Rescue Take-over units (unit 767 Sayeret Matkal, unit S13 Navy SEALs, and unit 7707 Lotar Eilat) in all areas of Counter-Terror and Hostage Rescue operations.
- 3 – Assigned to the C.T.S.O. School's Chief Instruction and Research and Development Section. Responsibilities include researching and developing Counter-Terror tactics, methodologies, and strategies and to integrate those elements into the School's teaching mandate by developing lesson plans and training the school's Counter-Terror instructors. Some of the subjects I was responsible for developing and integrating into the Israeli Defense Force's teaching mandate which all I.D.F. Special Forces units are trained in today include: Immediate Rapid Deployment for Active Shooter/Terror attack in open terrain, Combat in Built-up/Urban Areas, the use of the ballistic shield in urban warfare, Single operative Counter-Terror Combat Tactics. Responsibilities also include the assessment of current operational tactics used by all I.D.F. Special Forces units and to evaluate the success ratios of those tactics during operational deployments.
- 4 – Krav Maga instructor. Responsible for developing tactics for Special Forces units with mission specific tasks that require the use of empty handed/unarmed combat strategies. Responsibilities also include training the C.T.S.O. School's Krav Maga instructors.
- 5 – Team Leader on the Operational Counter-Terror Unit. Deployments include Direct Action missions, Active Shooter incident response, high-risk entries and searches of terrorist strongholds, high-risk arrests, and covert infiltration intelligence gathering operations throughout various regions in Israel including the Gaza Strip, the West Bank, and active border points.

- Achievements:**
- Received two Commendation Awards for Outstanding Service from two separate Special Ground Forces Commands for my work in developing and enhancing Counter-Terror methodologies and tactics for the Israeli Special Forces and for exceptional service in commanding the C.T.S.O. School's International Training Section.  
*-Selected among 1500 nominated soldiers from the Ground Forces Command.*
  - Participated in and led counter-terror and direct action missions targeting active terror organizations/cells and terrorists including counter guerrilla operations, covert infiltration into hostile environments to conduct various operations, immediate rapid deployment for active terror attacks, high-risk entries, searches, and arrests, dynamic entries, secure/stealth searches.
  - Developed specialized training programs in the subject matters of Counter Terror Warfare, Hostage Rescue, Tactical Firearms Manipulation and Shooting, and Krav Maga and delivered this training to thousands of soldiers from the Israeli Special Forces, the United States of America Special Forces, and other foreign Nations Special Forces Units.

## **CERTIFICATIONS AND SKILLS:**

LANGUAGES: Fluent in English, Hebrew, and French

### **MEDICAL EMERGENCY FIRST RESPONDER CERTIFICATION:**

-Certified in Emergency First-Aid and CPR through the Canadian Red Cross Society

### **POLICE TACTICAL OPERATIONS CERTIFICATION:**

- Basic Tactical Orientation Course (Provincial Tactical Officer Qualification)  
Ontario Power Generation Nuclear Response Force (Ontario, Canada)
- Special Weapons and Tactics and Hostage Rescue Qualification Course  
Criminal Justice Training Center – Macomb County Police Academy (Michigan, U.S.A.)

### **POLICE USE OF FORCE AND TACTICAL INSTRUCTOR CERTIFICATION:**

- Certified Provincial Use of Force Instructor – Ontario Police College
- Qualified Use of Force and Tactical Instructor – Atlantic Police Academy
- Certified Police Defensive Expandable Baton Instructor – Armament Systems and Procedures (ASP)
- Certified Police Tactical Handcuffing Instructor – Armament Systems and Procedures (ASP)
- Certified Instructor for Defensive Tactics, Expandable Baton, and Tactical Handcuffing – PPCT Systems
- Qualified and approved Use of Force Instructor for the private security field – Ontario Provincial Police

### **UNARMED COMBAT / MARTIAL ARTS EXPERIENCE:**

- Over 30 years of extensive training and instructing experience in:
  - Krav Maga (*Israeli Military Close Quarters Defensive Tactics System*) – 1<sup>st</sup> degree black belt
  - Combat Hap Ki Do – 1<sup>st</sup> degree black belt
  - W.T.F. Tae kwon Do – 1<sup>st</sup> degree black belt
  - Jeet Kune Do

### **FIREARMS CERTIFICATION AND EXPERIENCE:**

- Possess a valid Canadian Firearms license – possession and acquisition for restricted and non-restricted firearms
- Certified Law Enforcement Tactical Handgun Instructor – SIGARMS Academy
- Certified Law Enforcement Armorer for SIG semi-automatic pistols – SIGARMS Academy
- Qualified Range Safety Officer – Atlantic Police Academy
- Qualified Firearms Instructor – Chief Firearms Office / Ontario Provincial Police
- Qualified and approved Use of Force and Firearms Instructor for the Armored Car and Armed Guard field – Chief Firearms Office / Ontario Provincial Police
- Extensive knowledge and experience in the instruction and use of various firearms and weapons for combat and self-defense including:
  - Assault Rifles – Colt M-16/A1 / AR-15 / M4, Tavor, AK-47
  - Sub-machine guns – HK-MP5, Uzi, mini/micro Uzi
  - Shotguns – Remington 870, 12 gauge
  - Handguns – Glock 17/22, Sig-Sauer P226/228

## **PROFESSIONAL ACCOMPLISHMENTS:**

### **➤ ONTARIO POLICE COLLEGE**

- Subject Matter Resource to the Ontario Police College instruction sections on various subject matters related to tactics and strategies that are taught to Police recruits.
- Assisted in the enhancement of the High Risk Building Entry and Search program currently taught to Police recruits at the Ontario Police College.

### **➤ CANADIAN TACTICAL OFFICERS ASSOCIATION (CTOA)**

- Appointed as the Managing Director of the Canadian Tactical Officers Association.
- Provide training to the Police Tactical and Uniform Patrol community across Canada.
- Media spokesperson for the CTOA. Made numerous interview appearances on various news programs to provide insight on several high profile Police incidents across Canada and Police Use of Force and Tactical training and deployment. Appearances include:
  - CTV News: interviewed on Police shooting incidents, Explosive Forced Entry, and Use of Force training and deployment.
  - Global Television's Investigative news program 16x9: interviewed on training and deployment of the Police Patrol Rifle.

### **➤ ACTIVE SHOOTER INTERVENTION FOR POLICE**

- Developed a specialized Active Shooter Intervention methodology for Police services. This methodology is based on the Active Shooter/Terror Attack Intervention methodology used by the Israeli Defense Force which I was responsible for enhancing as well as developing several of the tactical applications implemented within the methodology.

This methodology is a court defensible best practices system structured on North American Use of Force policies. I delivered this program to all the Special Forces Units from the United States that attended the IDF Counter Terror School in Israel for training as well as to many Police Services and Units across North America, all of which have either completely replaced their Active Shooter Intervention program with mine or have implemented many of the tactics and strategies from my program into their current Active Shooter protocols.

- To date, trained thousands of Special Forces Soldiers, Police Tactical/SWAT Officers, Uniform Patrol Police Officers, Customs Officers, Tactical and Armed Security Officers, Close Protection Agents/Bodyguards, and Instructors in all those fields from various Countries around the world including Canada, the United States, Israel, and others.
- Appeared on numerous media resources in the capacity of an expert on Terrorism, Use of Force, and other Police, Military and Security related issues. Appearances include:
  - Global News: interviewed on hostage takings, hostage rescue and Police Use of Force training.
  - Discovery Channel: interviewed and provided an in-depth analysis on the terror attacks of September 11/2001 in New York City.
  - CTV News: interviewed on the Beslan School Hostage Crisis in September 2004.

Israeli Defense Force Special Forces Command Counter Terror Unit Operator and Instructor  
Qualification course graduation Diploma presented to Nir Maman, July 2007.

**"מלמד יחי למלחמה ונתת קשת מתושה זרעותי"**  
**(שמאל ב' ל"ב, ל"ה)**

**הצאת למעודה ב"י**

<u>יניב ניר ממון</u>	<u>סמ"ר</u>	<u>[REDACTED]</u>
שם	דרגה	מ.א.

**סיים בהצלחה**

**מסגול מש"ק לוס"ר**

**יולי '07**

<b>סג"ל</b>	<b>[REDACTED]</b>	<b>וס"ן</b>	<b>[REDACTED]</b>
<b>מפקד ביח"ס ולזט"ר קנ"צ</b>		<b>סגן מפקד ביח"ס ולזט"ר קנ"צ</b>	

Israeli Defense Force Ground Forces Special Qualifications Command  
Award for Outstanding Service presented to Nir Maman, April 2009.



# תעודת הצטיינות

סמ"ר יניב ממון

בהוקרה וזעזוע

על בחירתך כמצטיין קחצ"ר

ביום העצמאות ה-61 למדינת ישראל

י"שר כח!

אריק אלעזר, אל"מ  
מפקד המרהו"ם

יום העצמאות התשס"ט  
אפריל 2009



Israeli Defense Force Ground Forces Infantry and Paratroopers Command  
Award for Outstanding Service presented to Nir Maman, April 2009.



“בחוכמתך ותבונתך עשית לך חיל”  
(יחזקאל כ"ח ד')



מפקדת קצין חי"ר וצנחנים ראשי



# תעודת הצטיינות



מוענקת בזאת

לסמ"ר ממון יניב



על מצויינות, מסירות,



דוגמא אישית



ופועלך בחיל.



תא"ל יוסי בנר  
קצין חי"ר וצנחנים ראשי

22 אפריל 2009  
כ"ח בניסן התשס"ט



## ATLANTIC POLICE ACADEMY

Les Chipperfield, Executive Director  
P.O. Box 156  
Slemon Park, PEI Canada C0B 2A0

Location: 66 Argus Street

Tel: 902 888 6704  
Fax: 902 888 6725

File: 314

July 14, 2004

### RE: Nir Maman - Police Instructor Qualifications

This is to certify that Nir Maman is a Sworn Provincial Police Constable and Instructor with the Atlantic Police Academy, and has been since May 26, 2003.

Mr. Maman is a qualified instructor in the following areas:

**USE OF FORCE:** Defensive Tactics

Impact Weapons - expandable and straight baton  
Tactical Handcuffing  
O.C. Spray

**FIREARMS:**

Basic, advanced, and tactical shooting for;  
Handgun - Glock 17, SIG 226 9mm and 40 caliber  
Sub-machine gun - HK MP-5 9mm  
Assault Rifle - Colt AR-15/M4 Carbine 9mm and 5.56mm  
Shotgun - Remington 870/12 guage

**TACTICAL OPERATIONS:**

Basic and Advanced Tactical Operations  
Hostage Rescue Operations  
Building containment, assault, entry, and searching  
Critical Intelligence Gathering  
Immediate Rapid Deployment/Active Shooter Intervention  
High-Risk vehicle takedown and High-Risk Subject Arrest

Sincerely,

A handwritten signature in black ink, appearing to read "Les Chipperfield", is written over a circular stamp. The stamp contains the text "Les Chipperfield Executive Director".

Les Chipperfield  
Executive Director

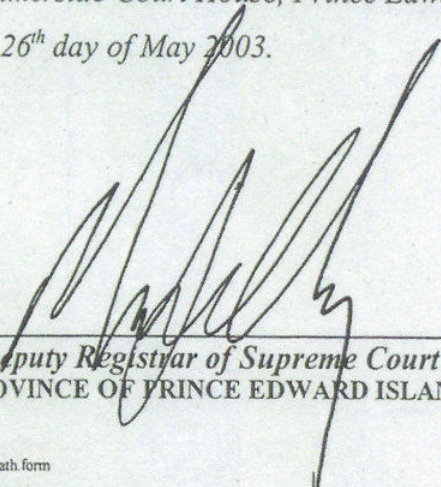


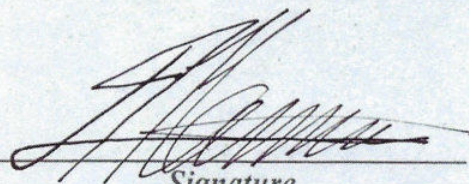
*Atlantic Police Academy*  
*Stemon Park, Prince Edward Island*

*I, Nir Maman, having been appointed a Provincial Police Constable for Prince Edward Island, do swear that I will truly, faithfully, and impartially perform the duties appertaining to the said office according to the best of my skill and ability.*

**SO HELP ME GOD**

**SWORN TO BEFORE ME** *at the*  
*Summerside Court House, Prince Edward Island*  
*the 26<sup>th</sup> day of May 2003.*

  
\_\_\_\_\_  
**Deputy Registrar of Supreme Court**  
**PROVINCE OF PRINCE EDWARD ISLAND**

  
\_\_\_\_\_  
**Signature**

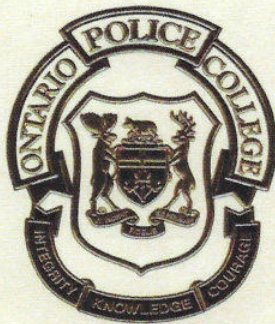
## Paskenta Band of Nomlaki Indians Tribal Police Department

### Oath of Office

*I, do solemnly swear, that I will support the Constitution of the United States, the Constitution and laws of the Paskenta Band of Nomlaki Indians and the Constitution and laws of the State of California, that I will bear true faith and allegiance to the same, and defend them against enemies, foreign and domestic, and that I will faithfully and impartially discharge, the duties of a peace officer, to the best of my ability, so help me God.*

Officer's Printed Name: <i>NIR MAMAN</i>	Officer's Signature: <i>[Signature]</i>
Chief or Deputy Chief's Signature: <i>[Signature]</i> 6-6-14	





THE ONTARIO POLICE COLLEGE WITH APPROVAL OF  
THE MINISTER OF COMMUNITY SAFETY AND CORRECTIONAL SERVICES,

PROVINCE OF ONTARIO,

HAS CONFERRED UPON

*Nir MAMAN*

THE ONTARIO POLICE TRAINING SYSTEM DIPLOMA  
ATTESTING TO SUCCESSFUL COMPLETION OF THE

*USE OF FORCE TRAINER COURSE*

*August 31, 2012*



*W. Stephen*  
A/DIRECTOR - ONTARIO POLICE COLLEGE

**ONTARIOPOWER**  
GENERATION

**CERTIFICATE OF ACHIEVEMENT**  
**NUCLEAR SECURITY RESPONSE TEAM**



This is to Certify that

*Nir Maman*

has successfully completed  
Basic Tactical Orientation Course 1201  
and has obtained the  
Nuclear Response Force Qualification

Paul Nadeau  
Vice President Nuclear Security  
Ontario Power Generation

April 26, 2012



**DEPARTMENT OF THE ARMY**  
D COMPANY, 2<sup>d</sup> BATTALION, 1<sup>st</sup> SPECIAL WARFARE TRAINING GROUP (AIRBORNE)  
UNITED STATES ARMY JOHN F. KENNEDY SPECIAL WARFARE CENTER AND SCHOOL  
FORT BRAGG, NC 28310-5000

AOJK-GPB-SD

14 May 2009

MEMORANDUM FOR RECORD

SUBJECT: Letter of Recommendation for SGM Nir Maman  
(Israeli Defense Force, Special Forces Counter-Terror  
and Special Operations School Section Commander and  
Counter-Terror Warfare Instructor)

1. In Mar of 2009 I attended a Small Unit Exchange with the IDF CT School at Camp Adam Israel. My counterpart was SGM Nir Maman. He was able to clearly articulate training methodology and mindset of the Israeli CT Operator. More importantly he was able to clarify why certain techniques were developed to combat terrorists in the 21<sup>st</sup> century. His hands on training approach was easy, straight forward, and made learning new techniques in a condensed time period effective.
2. SGM Nir Maman's explanation and practical application of the active shooter protocols were dynamic and enlightening. This technique and methodology has been adopted by many top tier counter terrorist organizations and law enforcement elements around the world. I would recommend that any organization that may be faced with a terrorist threat needs to learn this mindset and more importantly how to apply the dynamic techniques necessary to win in an active shooter scenario. Even for the most experienced CT Operator his explanation and methodology was truly enlightening and a good reminder of the basics that are often overlooked by advanced Operators.
3. SGM Nir Maman's Krav Maga combative training was the best I have seen in the last 27 years I have served in Special Forces. Typically the Krav Maga demonstrated at Dojos in the US are watered down, mixed disciplines, or very modified versions of the Krav Maga System. The IDF CT version Krav Maga that Nir taught was simple to comprehend, simple to exercise and perform, and most importantly taught the Operator proper combat fighting mindset to deal with relevant fighting scenarios.



**DEPARTMENT OF THE ARMY**  
D COMPANY, 2<sup>d</sup> BATTALION, 1<sup>st</sup> SPECIAL WARFARE TRAINING GROUP (AIRBORNE)  
UNITED STATES ARMY JOHN F. KENNEDY SPECIAL WARFARE CENTER AND SCHOOL  
FORT BRAGG, NC 28310-5000

SUBJECT: Letter of Recommendation for SGM Nir Maman  
(Israeli Defense Force, Special Forces Counter-Terror  
and Special Operations School Section Commander and  
Counter-Terror Warfare Instructor)

4. SGM Nir Maman's Hostage Rescue CQB training starts with active shooter protocols and culminates with detailed plans to execute HR Mission profiles which was absolutely spot on tactics to limit threat reaction time and allow a dominate exchange of control from terrorist to rescuer.

5. I recommend that any Top Tier Military or Law Enforcement unit schedule Nir at the earliest opportunity to train his techniques. It will serve as an eye opener to the most experienced Operators and will enlarge the tool box from which Operators draw from to overwhelm a threat and save lives.

6. Questions pertaining to this recommendation should be addressed to the undersigned at 910-432-9771 or [gouldp@soc.mil](mailto:gouldp@soc.mil), [peter.a.gould@us.army.mil](mailto:peter.a.gould@us.army.mil).

A handwritten signature in cursive script, reading "Peter A. Gould", is positioned above the typed name.

PETER A. GOULD  
SGM USA  
Company Sergeant Major



**UNITED STATES MARINE CORPS**  
HEADQUARTERS AND HEADQUARTERS SQUADRON  
MARINE CORPS AIR STATION IWAKUNI, JAPAN  
PSC 561 BOX 1862  
FPO AP 96310-0019

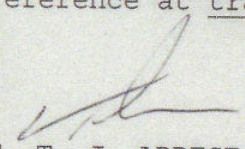
IN REPLY REFER TO:  
12000  
HADM  
8 Dec 09

From: Commanding Officer, Headquarters and Headquarters Squadron  
To: Whom It May Concern

Subj: **ACTIVE SHOOTER INTERVENTION TRAINING**

1. It is with great privilege that I write to you in recommendation of Active Shooter Intervention Training held by Mr. Nir Maman. The training we received here at Marine Corps Air Station Iwakuni, Japan was far beyond expectations. Mr. Maman and his associate came to the location and gave lasting and meaningful training that benefited all that were involved. The class was professional; the shooting at the range was conducted safely and was very meaningful in results. The class focused on an "active shooter". The class taught how to dispatch shooters in a time sensitive manor while stopping or minimizing civilian losses. This class can be tailored to the expert in the field or to the less experienced warriors.

2. I would highly recommend Active Shooter Training held by Mr. Maman. As a combat veteran, I know what it takes to stay alive. This training saves lives and is a must for any unit about to deploy to a combat zone. If you have any question concerning the training, I can be used as a reference at [tray.ardese@usmc.mil](mailto:tray.ardese@usmc.mil) or DSN 253-4670.

  
Lt. Col. T. J. ARDESE



**U.S. DEPARTMENT OF JUSTICE**  
**Federal Bureau of Investigations**

July 8, 2014

Re Nir Maman

To whom it may concern,

I am writing this letter of recommendation supporting Nir Maman's application for a Special Skills Visa. I came into contact with Mr. Maman when he was contracted to provide a Counter Terror/Active Shooter Response, Train the Trainer Course for the Federal Bureau of Investigation (FBI) Newark Division SWAT Team. Mr. Maman's training is cutting edge and I do not believe available anywhere else in the United States.

I have been a Special Agent of the FBI for the past 24 years, and have been a member of the FBI's SWAT program from 1996 to the present. I served as the SWAT Senior Team Leader (STL) for the Newark Division from 2003 until 2011 when I received a transfer to the Jacksonville Division where I am currently the STL for that team. I have attended many active shooter response schools. It is a testament to Mr. Maman that of all the training I have received, I believe his methods are the most practical and beneficial to responding law enforcement.

In today's law enforcement environment the tactical expertise which Mr. Maman possesses and shares is a rare commodity. Accordingly, it is without reservation that I recommend Nir Maman for the issuance of a Special Skills Visa.

Please note that the applicable Government Standards of Conduct require me to advise you that the information provided in this letter of recommendation is based solely on my personal knowledge of Mr. Maman and should not be construed as the official view of the FBI.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Raymond F. Lovett", is written over the typed name.

Raymond F. Lovett  
SWAT Senior Team Leader  
FBI, Jacksonville



*Toronto Police Service*  
**INTERNATIONAL POLICE OPERATIONS**

**CERTIFICATE OF APPRECIATION**

**NIR MAMAN**

**FOR YOUR INSTUCTION ON RECOGNITION OF EXPLOSIVES AND  
SUICIDE BOMBERS DURING THE TORONTO POLICE SERVICE  
INTERNATIONAL POLICE OPERATIONS DEPLOYMENT TRAINING**

**2012 APRIL CLASS**

A handwritten signature in blue ink, appearing to read "Bill Vollmar".

P.C. BILL VOLLMAR #8428  
TPS IPO COORDINATOR



Federal Law Enforcement Training Center  
U. S. Department of Homeland Security  
1131 Chapel Crossing Road  
Glynco, Georgia 31524

To: Nir Maman

From: Richard A. Scott  
Senior Instructor EOD/TAB

Date: June 15, 2009



Homeland  
Security

Subject: Terror Attack Active Shooter Immediate Intervention Course

Dear Nir,

I would like to take this time to offer thanks for the outstanding course you provided us on Terror Attack / Active Shooter Immediate Intervention. It was one of the most intense courses I have ever attended and proved to be worth every moment.

This course presented key elements necessary to saving lives during an Active Shooter attack that are presently missing in the Law Enforcement community. As well, this course taught the necessary mindset and tactics to help Police Officers drastically enhance their chances for surviving a deadly force encounter with an active threat.

Your unsurpassed professionalism and integrity in training was unwavering throughout the duration of this course and your level of instruction was excellent.

Specialists of your high caliber are rare. Your level of real world experience became readily apparent to all in attendance. You demonstrated an intricate understanding of the threat an Active Shooter truly poses to society.

Because of the way your training is implemented and the rare knowledge you bring to the table it should be expected that you will continue to "set the standard" for the Law Enforcement training community.

I have no loss for words when speaking to others when it comes to the quality, effectiveness, and reliability regarding your training.

Thank you again for the fantastic training experience.

//Signed

Richard A. Scott  
Senior Instructor, Enforcement Operations Division EOD/TAB  
Federal Law Enforcement Training Center  
(912) 267-2100



State of New Jersey  
OFFICE OF THE ATTORNEY GENERAL  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF STATE POLICE  
POST OFFICE BOX 7068  
WEST TRENTON NJ 08628-0068  
(609) 882-2000

JON S. CORZINE  
Governor

ANNE MILGRAM  
Attorney General

COLONEL JOSEPH R. FUENTES  
Superintendent

February 18, 2008

Mr. Nir Maman  
Krav Maga Israel, LLC  
127 Route 206, Unit 9  
Hamilton, NJ. 08610

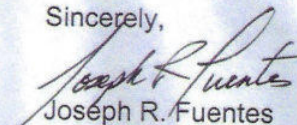
Dear Mr. Maman:

On behalf of the New Jersey State Police, I want to extend my personal gratitude to you for providing my academy staff with the exceptional Israeli Counter Terror and Rapid Deployment Tactics Course. This highly effective course of instruction was held at the Mercer County Range, Mercer County, New Jersey, from September 10-12, 2007, and allowed the New Jersey State Police to take part in training that will further enhance our current firearms capabilities.

It is important that our tactics continually evolve so our members are prepared to support modern law enforcement's mission to provide homeland and hometown protection to the citizens of this state. The Israeli Tactical Shooting system is a cutting edge, best practices training course that's geared towards ending hostile confrontations in a quick and efficient manner that limits collateral damage to innocent bystanders and police.

The division and the academy staff look forward to continuing this partnership and working with you in the future.

Sincerely,

  
Joseph R. Fuentes  
Colonel  
Superintendent

mm



New Jersey Is An Equal Opportunity Employer  
Printed on Recycled Paper and Recyclable



Detective Steven E. Hayden  
New York City Police Department – Emergency Service Unit

August 01, 2011

**RE: Active Shooter Intervention training by Nir Maman**

To whom it may concern;

This letter reflects upon the Active Shooter Intervention training for police conducted by Nir Maman. I am currently a tactical instructor for the N.Y.P.D. Emergency Service Unit with over 20 years of active law enforcement duty including patrol and tactical operations, in addition I am a veteran of the United States Military Special Forces with operational tours in Afghanistan. I have attended this course conducted by Nir Maman on two occasions. This training presented Israeli law enforcement/military response to active shooter incidents and presented several elements currently missing in the North American Law Enforcement community in relation to addressing this threat. I will attempt to compare its techniques, tactics and procedures to the current trends in North American Law Enforcement regarding response to the same.

The overwhelming response to the question of how to handle an active shooter situation by North American Law Enforcement is to form a team at the location of the incident and clear the target with the use of tactical formations and systematic searches. This approach is driven by the concept of Officer Safety, not the concept of the fastest possible mitigation of the incident in order to save the greatest number of innocent lives. The most critical element of an incident of this nature is **TIME**, the longer it takes to locate and engage the shooter, the greater the loss of life. Being a Police Officer is a dangerous profession, that said, the individual Officer has a duty to act to save innocent life without delay and if alone without backup. To wait at the scene of an active shooter as gun fire falls defenseless unarmed innocent civilians is unforgiveable, it would be a decision that Officer will be haunted by for the rest of their life. The armed responder is the only instrument that can stop the killing; it is imperative that the response is immediate and committed to ending the incident. The concept of the police being out gunned is the response of the timid, are you not better equipped to fight a gunman than the unarmed victims that fall before them? Your safety cannot be allowed to be the main consideration in your response to this type of incident; you must get in the fight and save those who cannot save themselves.

The Israeli response to an Active Shooter incident is swift and committed, their tactics and techniques have been forged in blood. As a society, Israel has experienced the greatest number of active shooter incidents the world over, they have learned what they practice at the cost of human life. The methodology taught by Nir Maman are the current most evolved tactics used to combat the Active Shooter in Israel; they are designed to save the maximum number of innocent lives while enhancing the officer's ability to mitigate threats in a complex and stressful operating environment.

This methodology reverse engineers the response structure used in North America and delivers a far more effective end result. In North America, although the spoken rule amongst the Law Enforcement community is 'the Officer will engage the situation on their own if need be', there is no safe methodology designed for single Officer response and in addition SOP's still dictate multiple Officer response and formations. The use of multiple Officers and formations is a perception of elevated safety and effectiveness, however Nir's course quickly exposes the weaknesses of this thinking that counter acts the objectives of both saving innocent lives and Officer safety.

Any type of formation work (for as little as two Officer teams up to larger teams) will only be effective in a controlled environment. An Active Shooter environment is the most uncontrolled environment that exists and will lend itself to issues such as tactical disconnect between formed up Officers. Not only will any type of a formation automatically slow down the response initiative (as real time assessment based information has to transfer through the team nucleus which must adapt collectively on an ongoing basis), but if the formation is disrupted in any way (such as an Officer down predicament) the entire formation comes to a halt until it re-collects, re-establishes individual task control within the team, and then proceeds. Even if the delay is mere seconds, that is a potential for more executed victims.

The Israeli methodology begins with single Officer response tactics and strategies which become the foundation for a multiple Officer team where any additional Officers blend seamlessly into the dynamic. This innovated platform automatically solves two issues. First it provides the most effective approach for single Officer response, it allows for an effective deployment of a single Officer should the severity of the circumstances call for it. Second, it allows for a more effective 'team' operation in an uncontrolled environment. Should the formation encounter a disconnect of any sort (such as an Officer down) the single Officer based team dynamic is not hindered in any way nor is it delayed.

In addition, I found this methodology to provide a much more tactically sound and safer outcome for Officers responding to a situation where they may encounter multiple dedicated, skilled, and hostile threats. The tactics used are simple and direct, complicated plans and techniques tend to fail under the stress of actual combat. This methodology does not deviate at all from the responsibility of the North American Law Enforcement community, it conforms fully to the policies and legal requirements of Use of Force criteria and litigation.

The Israeli response to Active Shooter Incidents is a fast, effective and tested best practices system. Any Police Department would do well to learn this methodology and its tactics and put them into practice, train for your next fight, it will come.

Nir Maman is a committed teacher and professional. As an instructor, Nir is polished and engaging, the intensity, experience, and knowledge he brings to his teaching is refreshing. The methodology and tactics are easily learned and retained with practice; the most important element is the mental attitude and mind set instilled into the individual Officer in this training. The current situation in North America calls for an absolute commitment by Law Enforcement to prepare to fight our enemy in our streets, schools and work places with the dedication and focus to win at all costs.

Sincerely,

//signed//

Detective Steven E. Hayden  
New York City Police Department  
Emergency Service Unit  
Tactical Training Section

# Western Chester County Emergency Response Team

Downington Police  
Chief James McGowan III

Caln. Twp. Police  
Chief Brian Byerly

Brandywine Regional Police  
Chief Mark Kocsi

East Fallowfield Police  
Chief Peter J. Mango



West Brandywine Police  
Chief Walter Werner

Coatesville Police  
Chief J. Canale

Parkeburg Police  
Chief Brian Sheller

February 28/2011

To: Nir Maman  
CT 707 - Israeli Krav Systems Inc.

RE: Dynamic Response Counter Ambush Shooting, Active Shooter Intervention,  
and Secure Search Training.

Mr. Maman,

I wanted to express my gratitude for offering the Active Shooter Intervention, Dynamic Response Shooting, and Secure Search training on February 23-24, 2011 in Hamilton New Jersey hosted by the Mercer County Police Academy. You are by far one of the best instructors I have had the privilege from which to learn. Your knowledge of armed and unarmed combat is astounding. All the material was presented in a clear and concise manner.

Your methodology in the world of counter terrorism and tactics should be standard training for all those in public service. My training philosophies will certainly change from this point on. I believe that your training will have a serious positive impact on our abilities to deal with Active Shooter incidents. What I found equally as valuable was your operational experience in this subject matter. It is one thing to train based on principles handed down from your predecessors, but in this case you are at the tip of the spear. Your basis for the tactics and information taught is from real world experience in one of the world's most violent places. As an instructor I can say that we would be doing a great disservice to those we are charged to train if we did not take your subject matter expertise to heart.

I thank you, Nir Maman, for your dedication and professionalism. The training was a turning point for me and those in my charge. You have clearly made an impact on our agency that will most likely result in saving lives.

Respectfully,

//Signed//

Sgt. Kevin Bernard  
Caln Township Police Department  
Team Leader for WCC Emergency Response Team  
(610) 383-1821 ext. 128

UNITED STATES MARSHALS SERVICE

# CERTIFICATE of APPRECIATION



Presented to

Instructor Nir Maman

*For your contributions to the mission of the United States Marshals Service  
Israeli Tactical Shooting Immediate Rapid Deployment and Counter-Terror Engagements  
September 7, 2007*

Honorable James T. Plousis  
United States Marshal

October 17, 2007

Date

CONSULATE GENERAL OF ISRAEL  
TORONTO

180 BLOOR ST. WEST, SUITE 700  
TORONTO, ONTARIO M5S 2V6  
Telephone: (416) 640-8500  
Fax: (416) 640-8555  
Website: <http://toronto.mfa.gov.il>



הקונסוליה הכללית של ישראל  
טורונטו

June 14, 2010

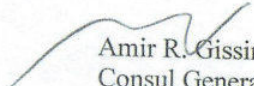
Mr. Nir Maman  
International Defense Force  
800 Steeles Avenue West  
Unit B-10, Suite 178  
Thornhill, ON L4J 7L2

Dear Mr. Maman,

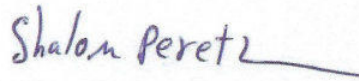
On behalf of the Consulate General of Israel, I would like to express our sincere thanks for your assistance during Prime Minister Benjamin Netanyahu's recent visit. As you may be aware, this was the first visit to Toronto by an Israeli Prime Minister in 32 years, and we were very proud that he came here and addressed this year's Walk for Israel rally.

However, such a visit requires a great deal of planning and attention to security matters. It would not have been possible without the expertise and dedication of professionals like yourself who helped to ensure its success. For this, we are most grateful, and once again convey our thanks for all your efforts.

Sincerely,

  
Amir R. Gissin  
Consul General

Sincerely,

  
Shalom Peretz  
Head of Security

In November 2008 the Israeli Defense Force's Counter-Terror Unit and Counter-Terror and Special Operations School (Unit 707), was featured in Special Operations Report Magazine. This magazine is a closed publication exclusive to the Global Military and Police Special Operations Community. Sergeant-Major Nir Maman shown on the cover of the issue (on the right in the standing position) was selected to be the spokesperson and representative of the unit for the feature.



SPECIAL OPERATIONS REPORT

ISRAEL: INP UNIT 33 • IDF LOTAR NYPD PC RAY KELLY FRENCH CPA 20 SAN DIEGO SWAT

VOLUME 17

# SPECIAL OPERATIONS REPORT

INSIDE THE WORLD OF POLICE AND MILITARY TACTICAL UNITS

## Spotlight: Israeli Counterterrorism

- INP Unit 33 Special Intelligence Unit
- IDF LOTAR CT School

## Commander's Briefing

NYPD Commissioner Ray Kelly

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## The Thin Black Line

San Diego Police SWAT



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# **Exhibit E**

AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT
for the
Northern District of California

Stephen Russell
Plaintiff
v.
Nir Maman et al.
Defendant
Civil Action No. 3:18-cv-06691-RS

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Albert Timen

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Table with 2 columns: Place (711 Third Avenue, 17th Floor, New York, NY 10017) and Date and Time (03/12/2019 10:00 am)

The deposition will be recorded by this method: Stenographically and videotape

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: See Attachment 1, attached hereto.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 02/07/2019

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk OR Attorney's signature (with handwritten signature)

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Stephen Russell, who issues or requests this subpoena, are: Joy Llaguno, 12121 Wilshire Blvd., Ste, 600, Los Angeles CA 90025, jllaguno@enensteinlaw.com, (310) 899-2070

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 3:18-cv-06691-RS

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_ .

I served the subpoena by delivering a copy to the named individual as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_ .

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
\_\_\_\_\_ *Server's signature*

\_\_\_\_\_ *Printed name and title*

\_\_\_\_\_ *Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**ATTACHMENT 1 – DOCUMENT REQUESTS**

**DEFINITIONS**

1. “YOU” hereinafter means and refers to responding third-party Albert Timen.
2. “RUSSELL” hereinafter means and refers to propounding party Stephen Russell.
3. “MAMAN” hereinafter means and refers to defendant Nir Maman and his agents, employees, representatives, attorneys, accountants, consultants, or other persons acting on his behalf.
4. “AKKELQUIST” hereinafter means and refers to defendant George Akkelquist and his agents, employees, representatives, attorneys, accountants, consultants, or other persons acting on his behalf.
5. “CT707” hereinafter means and refers to defendant CT707 Israeli Krav Systems, Inc. and any of its agents, directors, managers, officers, employees, representatives, attorneys, accountants, consultants, or other persons acting on its behalf.
6. “DFW” hereinafter means and refers to defendant DFW Metroplex Training Academy and any of its agents, directors, managers, officers, employees, representatives, attorneys, accountants, consultants, or other persons acting on its behalf.
7. “COMMUNICATIONS” hereinafter means letters, emails, facsimiles, telephone calls, text messages, SMS messages, conversations, correspondence, memoranda, and any other means or methods of communication, whether oral or written.
8. “DOCUMENTS” hereinafter means any handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored.
9. “RELATING TO” hereinafter means relating to, constituting, embodying, identifying, evidencing, reflecting, recording, showing, memorializing, consisting of, discussing, describing, mentioning, concerning, considering, evaluating, reviewing, analyzing, reporting on,

supporting, or bearing upon the subject matter of the request.

10. "RELEVANT TIME PERIOD" hereinafter means October 2017 to the present.

**DOCUMENT REQUESTS**

1. All DOCUMENTS RELATING TO services provided to RUSSELL.
2. All DOCUMENTS RELATING TO COMMUNICATIONS RELATING TO RUSSELL.
3. All DOCUMENTS RELATING TO payments RELATING TO RUSSELL.
4. All DOCUMENTS RELATING TO any services allegedly provided by MAMAN, CT707, AKKELQUIST, and/or DFW to RUSSELL during the RELEVANT TIME PERIOD.
5. All DOCUMENTS RELATING TO any representations made by MAMAN, CT707, AKKELQUIST, and/or DFW to RUSSELL during the RELEVANT TIME PERIOD.
6. All DOCUMENTS RELATING TO any representations made by MAMAN, CT707, AKKELQUIST, and/or DFW to YOU during the RELEVANT TIME PERIOD and RELATING TO RUSSELL.
7. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and MAMAN, CT707, AKKELQUIST, and/or DFW during the RELEVANT TIME PERIOD and RELATING TO RUSSELL.
8. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and anyone during the RELEVANT TIME PERIOD and RELATING TO RUSSELL and MAMAN, CT707, AKKELQUIST, and/or DFW.
9. All DOCUMENTS RELATING TO any payments made or received by MAMAN, CT707, AKKELQUIST, and/or DFW, RELATING TO RUSSELL.

# **Exhibit F**



**ENENSTEIN  
PHAM & GLASS**

**Los Angeles Office**  
12121 Wilshire Blvd, Suite 600  
Los Angeles, CA 90025  
(310) 899-2070  
enensteinlaw.com

Ned M. Gelhaar, Esq.  
ngelhaar@enensteinlaw.com

February 13, 2019

**VIA HAND DELIVERY**

Thomas LaFreniere  
5733 Davis Circle  
Rohnert Park, CA 94928

Re: *Russell v. Maman, et al.*; N.D. Cal. Case No. 3:18-cv-06691-RS

Dear Mr. LaFreniere:

Please find enclosed a deposition subpoena in the above-referenced matter. If you are unavailable on the date listed, please contact Ms. Joy Llaguno at my office and we will work with your schedule to set a convenient date, time, and place.

Very truly yours,

**ENENSTEIN PHAM & GLASS**

By:   
Ned M. Gelhaar, Esq.

*Attachments*

AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT
for the
Northern District of California

Stephen Russell
Plaintiff
v.
Nir Maman et al.
Defendant
Civil Action No. 3:18-cv-06691-RS

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Thomas LaFreniere

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action.

Table with 2 columns: Place (604 Mission Street, 4th Floor San Francisco, CA 94105) and Date and Time (03/13/2019 10:00 am)

The deposition will be recorded by this method: Stenographically and videotape

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: See Attachment 1, attached hereto.

The following provisions of Fed. R. Civ. P. 45 are attached - Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 02/07/2019

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk OR Attorney's signature (with handwritten signature)

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Stephen Russell, who issues or requests this subpoena, are: Joy Llaguno, 12121 Wilshire Blvd., Ste, 600, Los Angeles CA 90025, jllaguno@enensteinlaw.com, (310) 899-2070

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 3:18-cv-06691-RS

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_.

I served the subpoena by delivering a copy to the named individual as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

**(A) When Required.** On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

**(B) When Permitted.** To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**ATTACHMENT 1 – DOCUMENT REQUESTS**

**DEFINITIONS**

1. “YOU” hereinafter means and refers to responding third-party Thomas LaFreniere.
2. “RUSSELL” hereinafter means and refers to propounding party Stephen Russell.
3. “MAMAN” hereinafter means and refers to defendant Nir Maman and his agents, employees, representatives, attorneys, accountants, consultants, or other persons acting on his behalf.
4. “AKKELQUIST” hereinafter means and refers to defendant George Akkelquist and his agents, employees, representatives, attorneys, accountants, consultants, or other persons acting on his behalf.
5. “CT707” hereinafter means and refers to defendant CT707 Israeli Krav Systems, Inc. and any of its agents, directors, managers, officers, employees, representatives, attorneys, accountants, consultants, or other persons acting on its behalf.
6. “DFW” hereinafter means and refers to defendant DFW Metroplex Training Academy and any of its agents, directors, managers, officers, employees, representatives, attorneys, accountants, consultants, or other persons acting on its behalf.
7. “COMMUNICATIONS” hereinafter means letters, emails, facsimiles, telephone calls, text messages, SMS messages, conversations, correspondence, memoranda, and any other means or methods of communication, whether oral or written.
8. “DOCUMENTS” hereinafter means any handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored.
9. “RELATING TO” hereinafter means relating to, constituting, embodying, identifying, evidencing, reflecting, recording, showing, memorializing, consisting of, discussing, describing, mentioning, concerning, considering, evaluating, reviewing, analyzing, reporting on,

supporting, or bearing upon the subject matter of the request.

10. "RELEVANT TIME PERIOD" hereinafter means September 2017 to the present.

**DOCUMENT REQUESTS**

1. All DOCUMENTS RELATING TO services provided to RUSSELL.
2. All DOCUMENTS RELATING TO COMMUNICATIONS RELATING TO RUSSELL.
3. All DOCUMENTS RELATING TO payments RELATING TO RUSSELL.
4. All DOCUMENTS RELATING TO any services allegedly provided by MAMAN, CT707, AKKELQUIST, and/or DFW to RUSSELL during the RELEVANT TIME PERIOD.
5. All DOCUMENTS RELATING TO any representations made by MAMAN, CT707, AKKELQUIST, and/or DFW to RUSSELL during the RELEVANT TIME PERIOD.
6. All DOCUMENTS RELATING TO any representations made by MAMAN, CT707, AKKELQUIST, and/or DFW to YOU during the RELEVANT TIME PERIOD and RELATING TO RUSSELL.
7. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and MAMAN, CT707, AKKELQUIST, and/or DFW during the RELEVANT TIME PERIOD and RELATING TO RUSSELL.
8. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and anyone during the RELEVANT TIME PERIOD and RELATING TO RUSSELL and MAMAN, CT707, AKKELQUIST, and/or DFW.
9. All DOCUMENTS RELATING TO any payments made or received by MAMAN, CT707, AKKELQUIST, and/or DFW, RELATING TO RUSSELL.

# **Exhibit G**



**ENENSTEIN  
PHAM & GLASS**

**Los Angeles Office**  
12121 Wilshire Blvd, Suite 600  
Los Angeles, CA 90025  
(310) 899-2070  
enensteinlaw.com

Ned M. Gelhaar, Esq.  
ngelhaar@enensteinlaw.com

February 13, 2019

**VIA HAND DELIVERY**

Bryan Franklin Crutcher, Sr.  
507 Morningstar Way  
Vacaville, CA 95687

Re: *Russell v. Maman, et al.*; N.D. Cal. Case No. 3:18-cv-06691-RS

Dear Mr. Crutcher:

Please find enclosed a deposition subpoena in the above-referenced matter. If you are unavailable on the date listed, please contact Ms. Joy Llaguno at my office and we will work with your schedule to set a convenient date, time, and place.

Very truly yours,

**ENENSTEIN PHAM & GLASS**

By:   
Ned M. Gelhaar, Esq.

*Attachments*

AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the Northern District of California

Stephen Russell )
Plaintiff )
v. ) Civil Action No. 3:18-cv-06691-RS
Nir Maman et al. )
Defendant )

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Bryan Crutcher

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action.

Table with 2 columns: Place (604 Mission St., 4th Floor, San Francisco, CA 94105) and Date and Time (03/15/2019 10:00 am)

The deposition will be recorded by this method: Stenographically and videotape

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: See Attachment 1, attached hereto.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 02/13/2019

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Stephen Russell, who issues or requests this subpoena, are: Joy Llaguno, 12121 Wilshire Blvd., Ste, 600, Los Angeles CA 90025, jllaguno@enensteinlaw.com, (310) 899-2070

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 3:18-cv-06691-RS

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_.

I served the subpoena by delivering a copy to the named individual as follows: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) *Contempt.*

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**ATTACHMENT 1 – DOCUMENT REQUESTS**

**DEFINITIONS**

1. “YOU” hereinafter means and refers to responding third-party Bryan Crutcher.
2. “MAMAN” hereinafter means and refers to defendant Nir Maman and his agents, employees, representatives, attorneys, accountants, consultants, or other persons acting on his behalf.
3. “AKKELQUIST” hereinafter means and refers to defendant George Akkelquist and his agents, employees, representatives, attorneys, accountants, consultants, or other persons acting on his behalf.
4. “CT707” hereinafter means and refers to defendant CT707 Israeli Krav Systems, Inc. and any of its agents, directors, managers, officers, employees, representatives, attorneys, accountants, consultants, or other persons acting on its behalf.
5. “DFW” hereinafter means and refers to defendant DFW Metroplex Training Academy and any of its agents, directors, managers, officers, employees, representatives, attorneys, accountants, consultants, or other persons acting on its behalf.
6. “COMMUNICATIONS” hereinafter means letters, emails, facsimiles, telephone calls, text messages, SMS messages, conversations, correspondence, memoranda, and any other means or methods of communication, whether oral or written.
7. “DOCUMENTS” hereinafter means any handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored.
8. “RELATING TO” hereinafter means relating to, constituting, embodying, identifying, evidencing, reflecting, recording, showing, memorializing, consisting of, discussing, describing, mentioning, concerning, considering, evaluating, reviewing, analyzing, reporting on, supporting, or bearing upon the subject matter of the request.

9. "RELEVANT TIME PERIOD" hereinafter means December 2017 to the present.

**DOCUMENT REQUESTS**

1. All DOCUMENTS RELATING TO services provided to RUSSELL.
2. All DOCUMENTS RELATING TO COMMUNICATIONS RELATING TO RUSSELL.
3. All DOCUMENTS RELATING TO payments RELATING TO RUSSELL.
4. All DOCUMENTS RELATING TO any services allegedly provided by MAMAN, CT707, AKKELQUIST, and/or DFW to RUSSELL during the RELEVANT TIME PERIOD.
5. All DOCUMENTS RELATING TO any representations made by MAMAN, CT707, AKKELQUIST, and/or DFW to RUSSELL during the RELEVANT TIME PERIOD.
6. All DOCUMENTS RELATING TO any representations made by MAMAN, CT707, AKKELQUIST, and/or DFW to YOU during the RELEVANT TIME PERIOD and RELATING TO RUSSELL.
7. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and MAMAN, CT707, AKKELQUIST, and/or DFW during the RELEVANT TIME PERIOD and RELATING TO RUSSELL.
8. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and anyone during the RELEVANT TIME PERIOD and RELATING TO RUSSELL and MAMAN, CT707, AKKELQUIST, and/or DFW.
9. All DOCUMENTS RELATING TO any payments made or received by MAMAN, CT707, AKKELQUIST, and/or DFW, RELATING TO RUSSELL.

# **Exhibit H**

AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the Northern District of California

Stephen Russell

Plaintiff

v.

Nir Maman et al.

Defendant

Civil Action No. 3:18-cv-06691-RS

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Tara Walsh

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action.

Table with 2 columns: Place (711 Third Avenue, 17th Floor, New York, NY 10017) and Date and Time (03/08/2019 10:00 am)

The deposition will be recorded by this method: Stenographically and videotape

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: See Attachment 1, attached hereto.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 02/07/2019

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Handwritten signature of Stephen Russell

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Stephen Russell, who issues or requests this subpoena, are: Joy Llaguno, 12121 Wilshire Blvd., Ste, 600, Los Angeles CA 90025, jllaguno@enensteinlaw.com, (310) 899-2070

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 3:18-cv-06691-RS

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_ .

I served the subpoena by delivering a copy to the named individual as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_ .

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**ATTACHMENT 1 – DOCUMENT REQUESTS**

**DEFINITIONS**

1. “YOU” hereinafter means and refers to responding third-party Tara Walsh.
2. “RUSSELL” hereinafter means and refers to propounding party Stephen Russell.
3. “MAMAN” hereinafter means and refers to defendant Nir Maman and his agents, employees, representatives, attorneys, accountants, consultants, or other persons acting on his behalf.
4. “AKKELQUIST” hereinafter means and refers to defendant George Akkelquist and his agents, employees, representatives, attorneys, accountants, consultants, or other persons acting on his behalf.
5. “CT707” hereinafter means and refers to defendant CT707 Israeli Krav Systems, Inc. and any of its agents, directors, managers, officers, employees, representatives, attorneys, accountants, consultants, or other persons acting on its behalf.
6. “DFW” hereinafter means and refers to defendant DFW Metroplex Training Academy and any of its agents, directors, managers, officers, employees, representatives, attorneys, accountants, consultants, or other persons acting on its behalf.
7. “COMMUNICATIONS” hereinafter means letters, emails, facsimiles, telephone calls, text messages, SMS messages, conversations, correspondence, memoranda, and any other means or methods of communication, whether oral or written.
8. “DOCUMENTS” hereinafter means any handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored.
9. “RELATING TO” hereinafter means relating to, constituting, embodying, identifying, evidencing, reflecting, recording, showing, memorializing, consisting of, discussing, describing, mentioning, concerning, considering, evaluating, reviewing, analyzing, reporting on,

supporting, or bearing upon the subject matter of the request.

10. "RELEVANT TIME PERIOD" hereinafter means January 2017 to the present.

**DOCUMENT REQUESTS**

1. ALL DOCUMENTS RELATING TO any services allegedly provided by MAMAN to RUSSELL during the RELEVANT TIME PERIOD.

2. ALL DOCUMENTS RELATING TO any services allegedly provided by CT707 to RUSSELL during the RELEVANT TIME PERIOD.

3. ALL DOCUMENTS RELATING TO any services allegedly provided by AKKELQUIST to RUSSELL during the RELEVANT TIME PERIOD.

4. ALL DOCUMENTS RELATING TO any services allegedly provided by DFW to RUSSELL during the RELEVANT TIME PERIOD.

5. ALL DOCUMENTS RELATING TO any representations made by MAMAN to RUSSELL during the RELEVANT TIME PERIOD RELATING TO any alleged danger to RUSSELL, his family, or his business interests.

6. ALL DOCUMENTS RELATING TO any representations made by CT707 to RUSSELL during the RELEVANT TIME PERIOD RELATING TO any alleged danger to RUSSELL, his family, or his business interests.

7. ALL DOCUMENTS RELATING TO any representations made by AKKELQUIST to RUSSELL during the RELEVANT TIME PERIOD RELATING TO any alleged danger to RUSSELL, his family, or his business interests.

8. ALL DOCUMENTS RELATING TO any representations made by DFW to RUSSELL during the RELEVANT TIME PERIOD RELATING TO any alleged danger to RUSSELL, his family, or his business interests.

9. ALL DOCUMENTS RELATING TO any representations made by MAMAN to YOU during the RELEVANT TIME PERIOD RELATING TO any alleged danger to RUSSELL, his family, or his business interests.

10. All DOCUMENTS RELATING TO any representations made by CT707 to YOU during the RELEVANT TIME PERIOD RELATING TO any alleged danger to RUSSELL, his family, or his business interests.

11. All DOCUMENTS RELATING TO any representations made by AKKELQUIST to YOU during the RELEVANT TIME PERIOD RELATING TO any alleged danger to RUSSELL, his family, or his business interests.

12. All DOCUMENTS RELATING TO any representations made by DFW to YOU during the RELEVANT TIME PERIOD RELATING TO any alleged danger to RUSSELL, his family, or his business interests.

13. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and MAMAN during the RELEVANT TIME PERIOD RELATING TO any real, perceived, or fabricated danger to RUSSELL, his family, or his business interests.

14. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and CT707 during the RELEVANT TIME PERIOD RELATING TO any real, perceived, or fabricated danger to RUSSELL, his family, or his business interests.

15. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and AKKELQUIST during the RELEVANT TIME PERIOD RELATING TO any real, perceived, or fabricated danger to RUSSELL, his family, or his business interests.

16. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and DFW during the RELEVANT TIME PERIOD RELATING TO any real, perceived, or fabricated danger to RUSSELL, his family, or his business interests.

17. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and MAMAN during the RELEVANT TIME PERIOD RELATING TO any services allegedly performed for RUSSELL by MAMAN, AKKELQUIST, CT707, and/or DFW, including but not limited to efforts to obtain money in connection with such alleged services or otherwise.

18. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and CT707 during the RELEVANT TIME PERIOD RELATING TO any services allegedly

performed for RUSSELL by MAMAN, AKKELQUIST, CT707, and/or DFW, including but not limited to efforts to obtain money in connection with such alleged services or otherwise.

19. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and AKKELQUIST during the RELEVANT TIME PERIOD RELATING TO any services allegedly performed for RUSSELL by MAMAN, AKKELQUIST, CT707, and/or DFW, including but not limited to efforts to obtain money in connection with such alleged services or otherwise.

20. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and DFW during the RELEVANT TIME PERIOD RELATING TO any services allegedly performed for RUSSELL by MAMAN, AKKELQUIST, CT707, and/or DFW, including but not limited to efforts to obtain money in connection with such alleged services or otherwise.

21. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and MAMAN during the RELEVANT TIME PERIOD RELATING TO any subjects other than those previously described.

22. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and CT707 during the RELEVANT TIME PERIOD RELATING TO any subjects other than those previously described.

23. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and AKKELQUIST during the RELEVANT TIME PERIOD RELATING TO any subjects other than those previously described.

24. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and DFW during the RELEVANT TIME PERIOD RELATING TO any subjects other than those previously described.

25. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and William Capps, Esq. RELATING TO MAMAN, AKKELQUIST, CT707, and/or DFW.

26. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and Matan Gavish RELATING TO MAMAN, AKKELQUIST, CT707, and/or DFW.

27. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and Chris Ochoa RELATING TO MAMAN, AKKELQUIST, CT707, and/or DFW.

28. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and YOUR family members RELATING TO MAMAN, AKKELQUIST, CT707, and/or DFW.

# **Exhibit I**



**ENENSTEIN  
PHAM & GLASS**

**Los Angeles Office**  
12121 Wilshire Blvd, Suite 600  
Los Angeles, CA 90025  
(310) 899-2070  
enensteinlaw.com

Ned M. Gelhaar, Esq.  
ngelhaar@enensteinlaw.com

February 13, 2019

**VIA HAND DELIVERY**

Joseph Prendergast  
61 Ridge Road, New City  
New York, 10956-6824

Re: *Russell v. Maman, et al.*; N.D. Cal. Case No. 3:18-cv-06691-RS

Dear Mr. Prendergast:

Please find enclosed a deposition subpoena in the above-referenced matter. If you are unavailable on the date listed, please contact Ms. Joy Llaguno at my office and we will work with your schedule to set a convenient date, time, and place.

Very truly yours,

**ENENSTEIN PHAM & GLASS**

By: 

\_\_\_\_\_  
Ned M. Gelhaar, Esq.

*Attachments*

AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT
for the
Northern District of California

Stephen Russell
Plaintiff
v.
Nir Maman et al.
Defendant
Civil Action No. 3:18-cv-06691-RS

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Joseph Prendergast

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action.

Table with 2 columns: Place (711 Third Avenue, 17th Floor, New York, NY 10017) and Date and Time (03/14/2019 10:00 am)

The deposition will be recorded by this method: Stenographically and videotape

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: See Attachment 1, attached hereto.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 02/07/2019

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature (handwritten)

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Stephen Russell, who issues or requests this subpoena, are: Joy Llaguno, 12121 Wilshire Blvd., Ste, 600, Los Angeles CA 90025, jllaguno@enensteinlaw.com, (310) 899-2070

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 3:18-cv-06691-RS

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_.

I served the subpoena by delivering a copy to the named individual as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

**(A) When Required.** On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

**(B) When Permitted.** To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**ATTACHMENT 1 – DOCUMENT REQUESTS**

**DEFINITIONS**

1. “YOU” hereinafter means and refers to responding third-party Joseph Prendergast.
2. “RUSSELL” hereinafter means and refers to propounding party Stephen Russell.
3. “MAMAN” hereinafter means and refers to defendant Nir Maman and his agents, employees, representatives, attorneys, accountants, consultants, or other persons acting on his behalf.
4. “AKKELQUIST” hereinafter means and refers to defendant George Akkelquist and his agents, employees, representatives, attorneys, accountants, consultants, or other persons acting on his behalf.
5. “CT707” hereinafter means and refers to defendant CT707 Israeli Krav Systems, Inc. and any of its agents, directors, managers, officers, employees, representatives, attorneys, accountants, consultants, or other persons acting on its behalf.
6. “DFW” hereinafter means and refers to defendant DFW Metroplex Training Academy and any of its agents, directors, managers, officers, employees, representatives, attorneys, accountants, consultants, or other persons acting on its behalf.
7. “COMMUNICATIONS” hereinafter means letters, emails, facsimiles, telephone calls, text messages, SMS messages, conversations, correspondence, memoranda, and any other means or methods of communication, whether oral or written.
8. “DOCUMENTS” hereinafter means any handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored.
9. “RELATING TO” hereinafter means relating to, constituting, embodying, identifying, evidencing, reflecting, recording, showing, memorializing, consisting of, discussing, describing, mentioning, concerning, considering, evaluating, reviewing, analyzing, reporting on,

supporting, or bearing upon the subject matter of the request.

10. "RELEVANT TIME PERIOD" hereinafter means December 2017 to the present.

**DOCUMENT REQUESTS**

1. All DOCUMENTS RELATING TO services provided to RUSSELL.
2. All DOCUMENTS RELATING TO COMMUNICATIONS RELATING to RUSSELL.
3. All DOCUMENTS RELATING TO payments RELATING TO RUSSELL.
4. All DOCUMENTS RELATING TO any services allegedly provided by MAMAN, CT707, AKKELQUIST, and/or DFW to RUSSELL during the RELEVANT TIME PERIOD.
5. All DOCUMENTS RELATING TO any representations made by MAMAN, CT707, AKKELQUIST, and/or DFW to RUSSELL during the RELEVANT TIME PERIOD.
6. All DOCUMENTS RELATING TO any representations made by MAMAN, CT707, AKKELQUIST, and/or DFW to YOU during the RELEVANT TIME PERIOD and RELATING TO RUSSELL.
7. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and MAMAN, CT707, AKKELQUIST, and/or DFW during the RELEVANT TIME PERIOD and RELATING TO RUSSELL.
8. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and anyone during the RELEVANT TIME PERIOD and RELATING TO RUSSELL and MAMAN, CT707, AKKELQUIST, and/or DFW.
9. All DOCUMENTS RELATING TO any payments made or received by MAMAN, CT707, AKKELQUIST, and/or DFW, RELATING TO RUSSELL.

# **Exhibit J**

AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

Northern District of California

Stephen Russell )
Plaintiff )
v. ) Civil Action No. 3:18-cv-06691-RS
Nir Maman et al. )
Defendant )

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Ryan Micheletti

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Table with 2 columns: Place (604 Mission St., 4th Floor, San Francisco, CA 94105) and Date and Time (03/15/2019 10:00 am)

The deposition will be recorded by this method: Stenographically and videotape

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: See Attachment 1, attached hereto.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 02/12/2019

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Stephen Russell

, who issues or requests this subpoena, are: Joy Llaguno, 12121 Wilshire Blvd., Ste, 600, Los Angeles CA 90025, jllaguno@ensteinlaw.com, (310) 899-2070

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88A (REV. 02/14) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 3:18-cv-06691-RS

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_.

I served the subpoena by delivering a copy to the named individual as follows: \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

**(A) When Required.** On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

**(B) When Permitted.** To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**ATTACHMENT 1 – DOCUMENT REQUESTS**

**DEFINITIONS**

1. “YOU” hereinafter means and refers to responding third-party Ryan Micheletti.
2. “RUSSELL” hereinafter means and refers to propounding party Stephen Russell.
3. “MAMAN” hereinafter means and refers to defendant Nir Maman and his agents, employees, representatives, attorneys, accountants, consultants, or other persons acting on his behalf.
4. “AKKELQUIST” hereinafter means and refers to defendant George Akkelquist and his agents, employees, representatives, attorneys, accountants, consultants, or other persons acting on his behalf.
5. “CT707” hereinafter means and refers to defendant CT707 Israeli Krav Systems, Inc. and any of its agents, directors, managers, officers, employees, representatives, attorneys, accountants, consultants, or other persons acting on its behalf.
6. “DFW” hereinafter means and refers to defendant DFW Metroplex Training Academy and any of its agents, directors, managers, officers, employees, representatives, attorneys, accountants, consultants, or other persons acting on its behalf.
7. “COMMUNICATIONS” hereinafter means letters, emails, facsimiles, telephone calls, text messages, SMS messages, conversations, correspondence, memoranda, and any other means or methods of communication, whether oral or written.
8. “DOCUMENTS” hereinafter means any handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored.
9. “RELATING TO” hereinafter means relating to, constituting, embodying, identifying, evidencing, reflecting, recording, showing, memorializing, consisting of, discussing, describing, mentioning, concerning, considering, evaluating, reviewing, analyzing, reporting on,

supporting, or bearing upon the subject matter of the request.

10. "RELEVANT TIME PERIOD" hereinafter means September 2017 to the present.

**DOCUMENT REQUESTS**

1. All DOCUMENTS RELATING TO services provided to RUSSELL.
2. All DOCUMENTS RELATING TO COMMUNICATIONS RELATING TO RUSSELL.
3. All DOCUMENTS RELATING TO payments RELATING TO RUSSELL.
4. All DOCUMENTS RELATING TO any services allegedly provided by MAMAN, CT707, AKKELQUIST, and/or DFW to RUSSELL during the RELEVANT TIME PERIOD.
5. All DOCUMENTS RELATING TO any representations made by MAMAN, CT707, AKKELQUIST, and/or DFW to RUSSELL during the RELEVANT TIME PERIOD.
6. All DOCUMENTS RELATING TO any representations made by MAMAN, CT707, AKKELQUIST, and/or DFW to YOU during the RELEVANT TIME PERIOD and RELATING TO RUSSELL.
7. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and MAMAN, CT707, AKKELQUIST, and/or DFW during the RELEVANT TIME PERIOD and RELATING TO RUSSELL.
8. All DOCUMENTS RELATING TO any COMMUNICATIONS between YOU and anyone during the RELEVANT TIME PERIOD and RELATING TO RUSSELL and MAMAN, CT707, AKKELQUIST, and/or DFW.
9. All DOCUMENTS RELATING TO any payments made or received by MAMAN, CT707, AKKELQUIST, and/or DFW, RELATING TO RUSSELL.

# **Exhibit K**



**ENENSTEIN  
PHAM & GLASS**

**Los Angeles Office**  
12121 Wilshire Blvd, Suite 600  
Los Angeles, CA 90025  
(310) 899-2070  
enensteinlaw.com

Ned M. Gelhaar, Esq.  
ngelhaar@enensteinlaw.com

February 7, 2019

**VIA EMAIL ONLY**

Rod Divelbiss  
JRA Law Partners, LLP  
450 Pacific Ave., Suite 200  
San Francisco, CA 94133  
Email: rdivelbiss@jralp.com

Dek Ketchum  
Law Offices of Dek Ketchum  
900 Veterans Blvd., Suite 600  
Redwood City, CA 94063  
Email: ketchumlaw@yahoo.com

Re: *Russell v. Maman, et al.; N.D. Cal. Case No. 3:18-cv-00691-RS*

Dear Rod and Dek:

Attached please find courtesy copies of five (5) notices of third party depositions we've sent out for service. Copies have also been sent to your offices by mail. We will cooperate with you and the witnesses regarding the deposition dates, but we wanted to get the ball rolling toward getting these depositions scheduled.

Also, we understand that you are seeking a stay in this case. However, we do not believe you can prevent discovery from moving forward merely by filing a motion, which we contend is unfounded and is certainly premature. *See, e.g., Applied Materials, Inc. v. Semiconductor Spares, Inc.*, No. C95-20129RMW (EAI), 1995 WL 261451, at \*3 (N.D. Cal. Apr. 26, 1995) (denying stay and noting that there is "actually no parallel criminal proceeding" where defendant was merely under investigation by the FBI). In any event, depositions of third parties will obviously in no way implicate your clients' testimony.

Please contact me should you have any questions.

Very truly yours,

**ENENSTEIN PHAM & GLASS**

By:   
\_\_\_\_\_  
Ned M. Gelhaar, Esq.

Enclosures

cc: Darren S. Enenstein,  
Joy Llaguno,  
Nima Kamali

# **Exhibit L**



**ENENSTEIN  
PHAM & GLASS**

**Los Angeles Office**  
12121 Wilshire Blvd, Suite 600  
Los Angeles, CA 90025  
(310) 899-2070  
enensteinlaw.com

Ned M. Gelhaar, Esq.  
ngelhaar@enensteinlaw.com

February 13, 2019

**VIA EMAIL ONLY**

Rod Divelbiss  
JRA Law Partners, LLP  
450 Pacific Ave., Suite 200  
San Francisco, CA 94133  
[rdivelbiss@jralp.com](mailto:rdivelbiss@jralp.com)

Dek Ketchum  
Law Offices of Dek Ketchum  
900 Veterans Blvd., Suite 600  
Redwood City, CA 94063  
[ketchumlaw@yahoo.com](mailto:ketchumlaw@yahoo.com)

Re: *Russell v. Maman, et al.*; N.D. Cal. Case No. 3:18-cv-06691-RS

Dear Mr. Divelbiss & Mr. Ketchum:

We want to take short narrowly focused 30(b)(6) depositions of DFW and CT707 as soon as possible as to "where the money went." We need this evidence immediately so we can evaluate seeking preliminary relief, and potentially bring new parties into the action. I've attached draft 30(b)(6) notices so you can see precisely the scope of the document requests and deposition topics.

Please let me know the earliest possible date when we could take these depositions and propose a place or places where they could be held.

Best regards,

**ENENSTEIN PHAM & GLASS**

By:   
Ned M. Gelhaar, Esq.

*Attachments*

1 DARREN S. ENENSTEIN (SBN 195894)

Email: *dse@enensteinlaw.com*

2 NED M. GELHAAR (SBN 163185)

Email: *ngelhaar@enensteinlaw.com*

3 NIMA KAMALI (SBN 294401)

Email: *nkamali@enensteinlaw.com*

4 JOY D. LLAGUNO (SBN 311867)

Email: *jllaguno@enensteinlaw.com*

5 **ENENSTEIN PHAM & GLASS**

12121 Wilshire Boulevard, Suite 600

7 Los Angeles, California 90025

8 Tel.: (310) 899-2070

9 Fax: (310) 496-1930

Attorneys for Plaintiff STEPHEN RUSSELL

10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12 **STEPHEN RUSSELL**, an individual,

Case No. 4:18-cv-06691-RS

13 Plaintiffs,

**NOTICE OF DEPOSITION OF  
DEFENDANT DFW METROPLEX  
TRAINING ACADEMY**

14 vs.

DATE: \_\_\_\_\_

16 **NIR MAMAN**, an individual; **CT707**

TIME: \_\_\_\_\_

17 **ISRAELI KRAV SYSTEMS, INC.**,

LOCATION: \_\_\_\_\_

18 an Ontario corporation; **GEORGE**

19 **AKKELQUIST**, an individual; **DFW**

**METROPLEX TRAINING**

20 **ACADEMY**, a New York entity form

unknown, and DOES 1 through 20,

21 inclusive,

22 Defendants.

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that pursuant to Federal Rules of Civil Procedure  
3 Rule 30, Plaintiff STEPHEN RUSSELL (“Russell”) will take the oral deposition  
4 (“Deposition”) of Defendant DFW METROPLEX TRAINING ACADEMY  
5 (“DFW”) on \_\_\_\_\_, commencing at 10:00 a.m.,  
6 \_\_\_\_\_.

7 **PLEASE TAKE FURTHER NOTICE** that the matters on which DFW will  
8 be examined are as follows:

9 a. DFW’s request or demand for any money from Russell or anyone acting on  
10 his behalf.

11 b. DFW’s receipt of any money from Russell or anyone acting on his behalf.

12 c. DFW’s use, distribution, or investment of any money received from Russell  
13 or anyone acting on his behalf.

14 d. The whereabouts of any money DFW ever received from Russell or anyone  
15 acting on his behalf.

16 **PLEASE TAKE FURTHER NOTICE** that DFW is required to produce the  
17 following documents, records or other materials at the Deposition:

18 a. All DOCUMENTS (as used herein, “DOCUMENTS” means any writing  
19 and/or recording as defined by Rule 34(a) of the Federal Rule of Civil Procedure)  
20 relating to any request or demand for money by DFW to Russell or anyone acting  
21 on his behalf.

22 b. All DOCUMENTS relating to DFW’s receipt of any money from Russell or  
23 anyone acting on his behalf.

24 c. All DOCUMENTS relating to DFW’s use, distribution, or investment of any  
25 money received from Russell or anyone acting on his behalf.

26 d. All DOCUMENTS relating to the whereabouts of any money DFW ever  
27 received from Russell or anyone acting on his behalf.

28 ///

1           **NOTICE IS FURTHER GIVEN** that the Deposition will be taken before a  
2 certified shorthand stenographer and notary public who is authorized to administer  
3 oaths in the United States and State of California. The Deposition may also be  
4 recorded by audio or video recording, and through the instant display of visual  
5 testimony.

6  
7 DATE: February \_\_, 2019

ENENSTEIN PHAM & GLASS

8  
9 BY:

10 \_\_\_\_\_  
11 Darren S. Enenstein, Esq.  
12 Ned M. Gelhaar Esq.  
13 Joy D. Llaguno, Esq.  
14 Attorneys for Plaintiff  
15 Stephen Russell  
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1 DARREN S. ENENSTEIN (SBN 195894)

Email: *dse@enensteinlaw.com*

2 NED M. GELHAAR (SBN 163185)

Email: *ngelhaar@enensteinlaw.com*

3 NIMA KAMALI (SBN 294401)

Email: *nkamali@enensteinlaw.com*

4 JOY D. LLAGUNO (SBN 311867)

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5 **ENENSTEIN PHAM & GLASS**

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7 Los Angeles, California 90025

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Attorneys for Plaintiff STEPHEN RUSSELL

10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12 **STEPHEN RUSSELL**, an individual,

Case No. 4:18-cv-06691-RS

13 Plaintiffs,

**NOTICE OF DEPOSITION OF  
DEFENDANT CT707 ISRAELI  
KRAV SYSTEMS, INC.**

14 vs.

DATE: \_\_\_\_\_

16 **NIR MAMAN**, an individual; **CT707**

TIME: \_\_\_\_\_

17 **ISRAELI KRAV SYSTEMS, INC.**,

LOCATION: \_\_\_\_\_

18 an Ontario corporation; **GEORGE**

19 **AKKELQUIST**, an individual; **DFW**

**METROPLEX TRAINING**

20 **ACADEMY**, a New York entity form

unknown, and DOES 1 through 20,

21 inclusive,

22 Defendants.

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that pursuant to Federal Rules of Civil Procedure  
3 Rule 30, Plaintiff STEPHEN RUSSELL (“Russell”) will take the oral deposition  
4 (“Deposition”) of Defendant CT707 ISRAELI KRAV SYSTEMS, INC. (“CT707”)  
5 on \_\_\_\_\_, commencing at 10:00 a.m., at the office of Enenstein Pham &  
6 Glass, located at 12121 Wilshire Boulevard, Suite 600, Los Angeles, California  
7 90025.

8 **PLEASE TAKE FURTHER NOTICE** that the matters on which CT707  
9 will be examined are as follows:

10 a. CT707’s request or demand for any money from Russell or anyone acting on  
11 his behalf.

12 b. CT707’s receipt of any money from Russell or anyone acting on his behalf.

13 c. CT707’s use, distribution, or investment of any money received from Russell  
14 or anyone acting on his behalf.

15 d. The whereabouts of any money CT707 ever received from Russell or anyone  
16 acting on his behalf.

17 **PLEASE TAKE FURTHER NOTICE** that CT707 is required to produce  
18 the following documents, records or other materials at the Deposition:

19 a. All DOCUMENTS (as used herein, “DOCUMENTS” means any writing  
20 and/or recording as defined by Rule 34(a) of the Federal Rule of Civil Procedure)  
21 relating to any request or demand for money by CT707 to Russell or anyone acting  
22 on his behalf.

23 b. All DOCUMENTS relating to CT707’s receipt of any money from Russell or  
24 anyone acting on his behalf.

25 c. All DOCUMENTS relating to CT707’s use, distribution, or investment of  
26 any money received from Russell or anyone acting on his behalf.

27 d. All DOCUMENTS relating to the whereabouts of any money CT707 ever  
28 received from Russell or anyone acting on his behalf.

1           **NOTICE IS FURTHER GIVEN** that the Deposition will be taken before a  
2 certified shorthand stenographer and notary public who is authorized to administer  
3 oaths in the United States and State of California. The Deposition may also be  
4 recorded by audio or video recording, and through the instant display of visual  
5 testimony.

6  
7 DATE: February \_\_, 2019

ENENSTEIN PHAM & GLASS

8  
9 BY:

10 \_\_\_\_\_  
11 Darren S. Enenstein, Esq.  
12 Ned M. Gelhaar Esq.  
13 Joy D. Llaguno, Esq.  
14 Attorneys for Plaintiff  
15 Stephen Russell  
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