

Exhibit 1

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

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Civil Action No. 03 MDL 1570 (GBD) (SN)
ECF Case

This document relates to:

All cases

DECLARATION OF MOHAMMED AL SHEIKH

I, Mohammed Al Sheikh, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that:

1. The following facts are based on my personal knowledge.
2. I am a Minister of State of the Kingdom of Saudi Arabia. I have had primary responsibility for the oversight of the above captioned litigation on behalf of Saudi Arabia.
3. I have reviewed the February 21, 2020 letter filed by the Plaintiffs' Executive Committees (ECF No. 6003) as well as the February 21, 2020 Declaration of Andrew J. Maloney III (ECF No. 6003-2). In those submissions, Plaintiffs accuse Saudi Arabia of intimidating non-party witnesses in this action.
4. Specifically, Plaintiffs' February 21, 2020 letter states that: "One witness reported that Saudi Arabia approached a family member of a witness directly and threatened reprisals from the Kingdom if the witness offered testimony."
5. Mr. Maloney states in his declaration:

4. Within the last year, I was personally advised by a third party witness (CW1) that his/her family in the Middle East had been approached in person and directly threatened by Saudi government officials and/or their employees/agents within the past several months. More specifically, they were advised that if CW1 were to testify against the Saudi government, that there would be "serious consequences" for him/her and his/her family. CW1 understood that this meant that he/she and/or his/her family would be murdered.

5. On two other occasions within the last year, I spoke with another third party witness, CW2, who advised me that his/her family in Saudi Arabia had urged CW2 not to cooperate with the 9/11 investigation against the Saudi government and that they feared for their lives living inside the Kingdom. No specific person or threat was identified.

6. A third witness (CW3) within the last several months advised one of our investigators that he/she believed Saudi agents had been stalking him/her outside his/her residence shortly after his/her name surfaced during the litigation discovery. He/she indicated that he/she believed the Saudis were not only watching, but sending a message that they could get to him/her at any time and make him/her disappear.

7. A fourth witness (CW4) told one of our investigators that he/she was so afraid of the Saudis' reach, that he/she was considering buying a bulletproof vest to prevent harm.

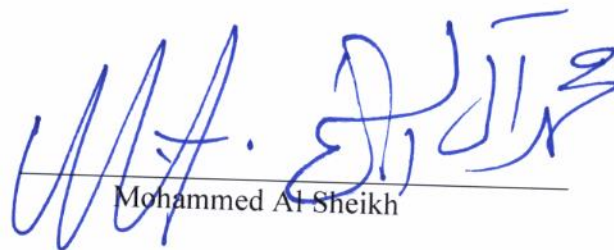
6. Given my supervisory responsibility over this litigation, I would be aware if any of the above allegations were true.

7. These claims are categorically false. No Saudi Arabian government official, employee, agent, or anyone acting on Saudi Arabia's behalf has attempted to threaten any potential witness or any witness's family members in this proceeding.

8. The only outreach that Saudi Arabia has made to potential non-party witnesses pertaining to this action has been through outside counsel. Neither Saudi Arabia itself, its officials, employees, nor any others acting on its behalf have made any attempt to contact, much less "stalk" or intimidate, any non-party witnesses or their family members with respect to this litigation.

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

Dated: February 27, 2020


Mohammed Al Sheikh