

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA)	Criminal No. 1:10CR485
)	
)	
v.)	Hon. Leonie M. Brinkema
)	
JEFFREY ALEXANDER STERLING)	
)	
Defendant.)	

**DEFENDANT JEFFREY STERLING'S
EXPERT DISCLOSURE FOR MARK FELDSTEIN**

At trial, Defendant Jeffrey Sterling may call Mr. Mark Feldstein as an expert witness in journalism and in particular journalistic practices with respect to the use and protection of unnamed sources. Mr. Feldstein is the Richard Eaton Professor of Broadcast Journalism at the Phillip Merrill College of Journalism at the University of Maryland at College Park. Mr. Feldstein's work has won more than 50 journalism awards, including broadcast journalism's most prestigious prizes: two George Foster Peabody public service awards, the Columbia-DuPont baton for investigative reporting, the Edward R. Murrow broadcasting prize, and 9 regional Emmys. His book, Poisoning The Press: Richard Nixon, Jack Anderson, and the Rise of Washington's Scandal Culture (Farrar, Straus & Giroux, 2010) has received widespread critical acclaim and won top academic awards for research and scholarship.

It is anticipated that Mr. Feldstein will testify that he has read Chapter 9 of State of War, authored by James Risen, and that based on his training, education, and experience as a working journalist and an academic studying journalism, will opine that it is written in the third-person omniscient, a narrative style in which the reader is presented the story by a narrator with an

overarching perspective, seeing and knowing everything that happens within the world of the story, regardless of the presence of certain characters, including imputing to the characters' internal voices what they are thinking and feeling. This style has become increasingly popular with mainstream journalists in recent years, as exemplified by books authored by Bob Woodward. One effect of the third-person omniscient narrative style is that it tends to mask the identity of a story's sources, protecting both the anonymity of sources and disguising the number of sources. It is not uncommon using this style for an author to ascribe thoughts or motivations to particular "characters," whether or not the author has actually spoken directly to the individual to whom thoughts and motivations are being ascribed. Indeed, it is not an uncommon practice to ascribe thoughts and motives to an individual to whom the author has not spoken intentionally to obscure who the actual source(s) for a story were.

Journalists commonly use techniques to disguise their sources. This is truth both in the newsgathering phase of writing a story and in its publication. Accordingly, statements made to third parties, including prospective sources, purporting to identify other sources from whom the author has obtained information are inherently suspect and should not be accepted at face value. Similarly, statements in book proposals, or other statements by an author "selling" a story, about the identity or number of sources are inherently suspect and should not be accepted at face value.

Chapter 9 of State of War attributes thoughts and motivations both the "the Russian scientist" and to "the CIA case officer." It is not possible to infer from this attribution whether Mr. Risen spoke directly to both of these individuals, one of them or neither of them, in gathering the information contained in Chapter 9, much less what information, if any, either individual provided Mr. Risen.

Taken at face value, Mr. Risen had multiple sources for the portion of Chapter 9 of State of War that discusses a CIA operation to provide flawed information to Iran's nuclear program. These sources include multiple human sources as well as documentary sources, which may have been provided to Mr. Risen by persons who also gave oral information to Mr. Risen or by others in addition to those who gave him oral information. Mr. Feldstein bases this opinion, in part, on the following examples: 1) page 197 of the book attributes information to a "secret CIA report"; 2) the material quoted at pages 204-05 of the book appears to have been quoted from a documentary source; 3) page 208 attributes views to unnamed "officials"; 4) page 211 cites "several former CIA officials"; and 5) page 211 indicates that the Senate Select Committee on Intelligence received information about the program from the "CIA case officer," but states the Committee took no action.

Mr. Feldstein will opine that all statements in Chapter 9 that seem to indicate the potential identity of sources must not be taken at face value due to the use of the third-person omniscient narrative style and common practice of journalists to obfuscate the identity and number of unnamed sources. However, Mr. Feldstein will also opine that journalistic practices would dictate that a journalist would not publish a story such as the one about the CIA operation detailed in Chapter 9 to disrupt the Iranian nuclear program relying on a single source. Therefore, it is likely that Chapter 9's account of this story relied on multiple sources for the information presented in that Chapter. It is impossible to know from reading the Chapter, however, who provided what information to Mr. Risen.

Dated: August 31, 2011

Respectfully submitted,
JEFFREY A. STERLING

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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of August, 2011, I caused the foregoing to be electronically mailed to:

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