



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP
F. #2015R00096

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 19, 2016

By ECF and Federal Express

Deborah A. Colson, Esq.
Colson & Harris LLP
80 Broad Street, 19th Floor
New York, New York 10004

Anthony L. Ricco, Esq.
20 Vesey Street, Suite 400
New York, New York 10007

Re: United States v. Munther Omar Saleh, et al.
Criminal Docket No. 15-393 (MKB)

Dear Ms. Colson and Mr. Ricco:

Enclosed please find supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which is being produced pursuant to the Protective Orders entered by the Court on August 20, 2015, as modified on December 16, 2015:

- Electronic communications of the defendants and co-conspirators, bearing Bates numbers SMR 1 through SMR 225; and
- A hard drive, bearing Bates number SMR 226, containing images from computers seized from Sam Topaz and from the residence of Nader and Alaa Saadeh.

This disclosure supplements the government's prior productions of October 5, October 30, and November 18, 2015. The government renews its request for reciprocal discovery from the defendant.

Please feel free to contact me if you have additional questions.

Very truly yours,

ROBERT L. CAPERS
United States Attorney

By: /s/ Douglas M. Pravda
Douglas M. Pravda
Assistant U.S. Attorney
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Enclosures (SMR 1 – SMR 226)

cc: Clerk of the Court (MKB) (by ECF) (without enclosures)