



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SDD:SPN
F. #2015R00079

*271 Cadman Plaza East
Brooklyn, New York 11201*

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By Email and ECF

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565 Fifth Avenue
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New York, NY 10017

Re: United States v. Tairod Nathan Webster Pugh
Criminal Docket No. 15-116 (NGG)

Dear Counsel:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure and Rules 701 et seq. of the Federal Rules of Evidence, the government hereby discloses that it intends to call Dr. Matthew A. Levitt as an expert witness at trial. Dr. Levitt is an expert in international terrorism, with a primary focus on terrorist groups based in the Middle East. Dr. Levitt holds a Masters of Law and Diplomacy and a Ph.D. in International Relations from The Fletcher School of Law and Diplomacy at Tufts University. The government encloses a copy of Dr. Levitt's curriculum vitae.

Dr. Levitt will be called to testify as an expert in the global jihadi movement and the designated foreign terrorist organization the Islamic State of Iraq and the Levant ("ISIL"). In particular, he will be asked about ISIL's history, structure, strategic goals, geographic location, and methods and means, including the organization's use of social media and propaganda materials to recruit fighters from the United States and other western countries and its use of the Turkish border with Syria as an entry point for foreign recruits. Dr. Levitt will further testify about the meaning of certain jargon used by the defendant or that appears in the materials the defendant kept on his laptop, including the terms "jihad," "daesh," and "dawla." Finally, Dr. Levitt may be asked to testify about certain physical evidence the government will introduce at trial, including videos and other propaganda materials seized from the defendant's laptop, and to explain the significance of those materials and the phrases, images, and symbols contained therein in the context of the defendant's radicalization and embrace of ISIL and the broader global jihadi movement.

