



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JMH/DKK  
F.#2011R00298

*271 Cadman Plaza East  
Brooklyn, New York 11201*

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By ECF and Federal Express

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Re: United States v. Mirsad Kandic  
Criminal Docket No. 17-449 (NGG)

Dear Counsel:

Enclosed please find discovery provided by the government in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the discovery provided on November 14, 2017, November 22, 2017, November 29, 2017, March 20, 2018, April 19, 2018, June 21, 2018, and July 5, 2018. The enclosed items constitute SENSITIVE DISCOVERY MATERIAL and are governed by the Stipulation and Order previously entered by the Court (ECF No. 15). The government renews its request for reciprocal discovery from the defendant.

Enclosed please find the following:

- An additional report containing the defendant's statements, bearing Bates number MK-004663;
- A letter containing additional information, bearing Bates numbers MK-004664 to MK-004665;

- Travel records relating to the defendant, bearing Bates numbers MK-004666 through MK-004672;
- Travel records relating to Jake Bilardi, bearing Bates numbers MK-004673 through MK-004679;
- Records obtained from Google relating to two email accounts belonging to the defendant, in a folder bearing Bates number MK-004680;
- Records obtained from Twitter relating to various Twitter accounts belonging to the defendant, in a folder bearing Bates number MK-004681;
- Copies of seven search warrants, affidavits and related documentation by which various records were obtained from electronic devices and mobile messaging providers in connection with this case (records obtained via these warrants have been produced to you previously or are being produced with this letter), bearing Bates numbers MK-004682 through MK-005247;
- Copies of various forms of identification bearing the defendant's photograph, and associated documents, obtained from the defendant's former residence in Sarajevo, Bosnia, bearing Bates numbers MK-005248 through MK-005265;
- A record containing statements of the defendant, bearing Bates number MK-005266. The individual referenced in this record may have information helpful to the defense;
- Copies of documents and information obtained from foreign governments pursuant to mutual legal assistance requests including, where applicable, draft translations thereof. These documents bear Bates numbers MK-005267 through MK-005764. The government reserves the right to revise the translations in advance of trial;<sup>1</sup>
- Documents obtained from Bosnian authorities in connection with the identification documents referenced above (i.e., MK-005248 through MK-005265). These documents bear Bates numbers MK-005780 through MK-005789; draft translations thereof are included, bearing

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<sup>1</sup> Please note that Bates number MK-005765 is unassigned.

Bates numbers MK-005766 through MK-005778 (the government reserves the right to revise these translations in advance of trial); and

- A record containing statements of the defendant, bearing Bates number MK-005779.

Please contact us if you have any questions or requests.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: \_\_\_\_\_ /s/\_\_\_\_\_  
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Enclosures (c/o James M. Branden, Esq.)

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