



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 22, 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:

- E-mail messages sent to a co-conspirator of the defendants, bearing Bates numbers SMR 227 – SMR 241, which are referenced in the government’s letter of January 12, 2016;
- Partially redacted documents reflecting a co-conspirator’s Internet browsing activity, and images accessed through cellular telephone number (347) 517-1245, bearing Bates numbers SMR 242 – SMR 375 and SMR 698 – SMR 708; and
- Partially redacted documents reflecting defendant Munther Saleh’s Internet browsing activity and search history, and images accessed through the Broadband account ending in 6299 or through cellular

telephone number (347) 707-3775, bearing Bates numbers SMR 376 – SMR 697 and SMR 709 – SMR 1146.

This disclosure supplements the government's prior productions of October 5, October 30, and November 18, 2015, and January 19, 2016. The government renews its request for reciprocal discovery from the defendants.

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
(718) 254-6268

Enclosures (SMR 227 – SMR 1146)

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