

# CREIZMAN LLC

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*By ECF and Email*

January 10, 2016

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Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *United States v. Tairod Pugh*, 15-CR-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 defense hereby discloses that it intends to call Gregory D. Johnsen as an expert witness at trial. Gregory Johnsen is an expert on Middle Eastern politics and terrorism. Mr. Johnsen is a Ph.D. candidate in Near Eastern Studies at Princeton, and he is the author of *The Last Refuge: Yemen al-Qaeda, and America's War in Arabia*. Mr. Johnsen also was a Fulbright Fellow in Yemen and a Fulbright-Hays Fellow in Egypt. In addition, Mr. Johnsen was a reporter for BuzzFeed as a Michael Hastings National Security Fellow. In 2014, Mr. Johnsen was awarded the Everett McKinley Dirksen Award for Distinguished Reporting on Congress by the National Press Foundation, in connection with stories on terrorism and security matters, including an analysis of the Congressional resolution that authorized military action against those responsible for the 9/11 terrorist attacks. Mr. Johnsen's curriculum vitae is attached.

Mr. Johnsen will be called to testify as an expert on terrorist organizations operating in the Middle East, including ISIS. In particular, he will be asked about ISIS's history, structure, strategic goals, geographical locations, affiliate organizations, and methods and means, including its efforts to recruit Westerners and Muslims to join the organization as fighters and to immigrate to the Islamic State. We anticipate that he will also be asked about ISIS's governance of the territories in Syria and Iraq under its control, daily life of the individuals who reside in those

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territories, and the common practices of Westerners and Muslims in attempting to immigrate to those countries.

Mr. Johnsen will likely further testify about the meaning of certain phrases used by Mr. Pugh that appear in the materials found on his electronic devices and in his communications with others, including the terms “hijra,” “jihad,” “dawla,” and “mujahid.” Finally, Mr. Johnsen may be asked to testify about certain physical evidence that the government is likely to introduce at trial, including materials seized from Pugh’s laptop, his electronic devices, and his backpacks, and to explain the significance of those materials in the context of Mr. Pugh’s comments regarding ISIS and the territories controlled by ISIS. These materials reference words, concepts, individuals, and places that are well-known to students of Middle East and radical Islamic terrorism, but are generally unfamiliar to laypersons.

Mr. Johnsen’s experience in this field, his academic writings, and his reporting on these subjects, as extensively detailed in his *curriculum vitae*, will serve as the bases for his testimony and opinions.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

/s/ Eric M. Creizman  
Eric Creizman

Attachment (by email)

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