



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SN/MEB
F. #2015R00079

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 10, 2015

By Email and ECF

Eric M. Creizman, Esq.
565 Fifth Avenue
7th Floor
New York, NY 10017

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

Dear Mr. Creizman:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, please find enclosed with this letter three DVDs containing additional discovery in the above-captioned matter. This discovery supplements the discovery produced on April 4, 2015 (TP 00001-4009 and portable hard drive labeled: 415-M-NY-5959970 Discovery Copy, 4/1/2015, SID 1527772, FBI NYD, Initial: "CR"), and on April 24, 2015 (TP 4010-4092). The government again requests reciprocal discovery.

The following documents and items are enclosed:

Description	Bates Range
Report of Examination dated April 28, 2015 concerning enhancement of audio on Item Q15 (Defendant's Recorded Statements to Undercover Officer Made on January 15, 2015)	TP 04093-4094
Department of Defense Contractor Application from the defendant, June 2009	TP 04095-4097
Metropolitan Detention Center ("MDC") Call Records for the defendant	TP 04098

MDC Contact List for the defendant	TP 04099-4100
MDC Phone List for the defendant	TP 04101
Defendant's handwritten name from January 15, 2015 meeting with Undercover Officer	TP 04102
FBI 302 report regarding covert recording of the defendant on January 15, 2015 at John F. Kennedy Airport	TP 04103-4104
I025 Customs and Border Protection Report regarding statements by the defendant, January 15, 2015	TP 04105-4107
DVD Containing Defendant's MDC phone calls from his incarceration in this case through May 17, 2015	TP 04108
DVD Containing Enhanced Copy of Item Q15, Referred to As RC15 (Defendant's Recorded Statements to Undercover Officer Made on January 15, 2015)	TP 04109

Please feel free to contact me should you have any questions or concerns.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/ Mark E. Bini
Sam Nitze
Tiana Demas
Mark E. Bini
Assistant U.S. Attorneys
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Enclosures: TP 04093-4109

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