



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP
F. #2015R00096

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 31, 2016

By ECF and FedEx

Richard D. Willstatter, Esq.
Green & Willstatter
200 Mamaroneck Avenue, Suite 605
White Plains, New York 10601
Email: willstatter@msn.com

Re: United States v. John Doe
Criminal Docket No. 15-302 (MKB)

Dear Mr. Willstatter:

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 Order entered by the Court on July 6, 2015, as modified on December 16, 2015:

- Partially redacted documents reflecting co-conspirator 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 1147 – SMR 1190.
- Partially redacted documents reflecting the defendant's Internet browsing activity, and images accessed through cellular telephone number (347) 517-1245, bearing Bates numbers SMR 1191 – SMR 1222; and
- A CD, bearing Bates number SMR 1223, containing audio recordings of telephone conversations for which transcripts or summaries (bearing Bates numbers SMR 1 – SMR 17) were previously produced on January 19, 2016.

This disclosure supplements the government's earlier disclosures under cover of letters dated July 7, July 13, August 6, September 3, September 17, September 18,

September 20, September 21, and October 22, 2015, January 19 and 22, 2016, and February 4, 2016. The government renews its request for reciprocal discovery from the defendant.

If you have any questions or requests regarding further discovery, please do not hesitate to contact me.

Very truly yours,

ROBERT L. CAPERS
United States Attorney

By: /s/ Douglas M. Pravda
Ian C. Richardson
Alexander A. Solomon
Douglas M. Pravda
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Enclosures (SMR 1147 – SMR 1223)

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