



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 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:

- 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 1147 – SMR 1190.
- 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 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 prior productions of October 5, October 30, and November 18, 2015, and January 19, January 22, January 31, February 4, and February 9, 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
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Enclosures (SMR 1147 – SMR 1223)

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