



U.S. Department of Justice

Jeffrey A. Taylor
United States Attorney

District of Columbia

*Judiciary Center
555 Fourth St., N.W.
Washington, D.C. 20530*

January 17, 2012

VIA FEDEX

Haytham Faraj, Esq.
PUCKETT & FARAJ, PC
1800 Diagonal Road, Suite 210
Alexandria, VA 22314
703-706-0442 Phone
202-280-1039 Fax

Re: United States v. Ramon Davila
Criminal Case No. 11-279 (ABJ)

Dear Mr. Faraj:

I am writing to provide you with information in response to your request for discovery pursuant to Fed. R. Crim. P. 16. Please find enclosed herewith discovery materials relating to the above-referenced case. The materials are contained on a single CD, the contents of which are described below. This production is intended to supplement the informal discovery that was provided to you with our correspondence dated May 31, 2010, and the formal discovery that was provided to you at arraignment on October 28, 2011, and at a status hearing on November 7, 2011.

These documents are subject to the agreement to protect identifiable personal information which you signed on May 31, 2010.

The enclosed disk contains:

* MSM Training Materials (MSM-TRAINING-0001 thru -5689). In particular, we direct your attention to MSM-TRAINING-1122 to -1144, which contain the powerpoint slides referenced in Tab C of the Lesson Plan binder provided to you in the discovery on November 7, 2011. We also direct your attention to MSM-TRAINING-1145 to -1155, which contain the identical material to that previously disclosed to you on November 7, 2011 in Tab C of the Lesson Plan binder.

MSM submitted these materials (MSM-TRAINING-0001 thru -5689) to OPM for

approval, as required by the contract MSM held with OPM. OPM made comments and edits to the materials, which are highlighted throughout. The Lesson Plan binder provided to you in the discovery on November 7, 2011, incorporated the comments made by OPM into that binder.

We also note that some of the documents contain a date field in the bottom left corner that automatically populated with the date the documents were uploaded at the U.S. Attorney's Office (1/4/2012).

* Training Materials (CLASSMATE-000001 to -000317). These materials were recovered from an individual who was a classmate of your client's during their training class to become background investigators. We direct your attention to CLASSMATE-0000068, the class roster, which lists your client as attending.

* Records, including personnel and security records, for record checks that your client falsified. The records are labeled by count (RECORDS-CT_06-1-0001 to RECORDS-CT_23B-0001) with the exception of Count 8b, which is labeled CHIMES-0001.

* Personnel/Security Files of Ramon Davila from MSM, USIS, and SA-Tech (PERSONNEL-0002 to -0119).

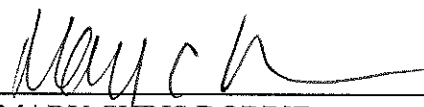
* Removal paperwork when your client was removed from the contract with OPM. (REMOVAL-0001)

Please note that we are continuing to evaluate the counts charged in the Indictment, and we reserve the right to move to strike counts prior to trial in order to streamline the presentation of the government's case.

Please do not hesitate to contact us if you have any questions. My phone number is 202-252-6975, and Ellen's phone number is 202-252-1773.

Sincerely,

RONALD C. MACHEN JR.
United States Attorney

By: 

MARY CHRIS DOBBIE
ELLEN CHUBIN EPSTEIN
Assistant United States Attorneys

Enclosures