



U.S. Department of Justice

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December 13, 2010

Mr. Haytham Faraj  
Puckett & Faraj PC  
6200 Schaeffer Road  
Suite 202  
Dearborn MI 48124

RE: United States v. Hamama (08-20314)

Dear Counsel,

The following is the government's notice to you pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G):

The government intends to call Michael T. Rochford as an expert in espionage and counterintelligence. Mr. Rochford's qualifications are enclosed.

Mr. Rochford will offer testimony about tradecraft and techniques used by foreign intelligence services that are engaged in espionage inside the United States. Mr. Rochford will testify about the techniques used by the FBI to investigate and uncover the espionage activities of foreign governments in the United States, including the importance of the notification requirement contained in Title 18, United States Code, Section 951. Mr. Rochford will testify about the significance of a security clearance application form in a counterintelligence investigation.

Mr. Rochford will base his testimony on his training and experience, his review of the IIS documents in this case, and the defendant's security clearance applications.

On December 22, 2009, we requested reciprocal discovery of the defendant's expert

witnesses, pursuant to Federal Rule of Criminal Procedure 16(b)(1)(C). We did not receive a response from you. If you intend to use an expert witness, we again request discovery pursuant to Rule 16(b)(1)(C).

Sincerely,

BARBARA L. MCQUADE  
United States Attorney

A handwritten signature in black ink, appearing to read "Michael C. Martin".

Michael C. Martin  
Assistant United States Attorney

A handwritten signature in black ink, appearing to read "Cathleen M. Corken".

Cathleen M. Corken  
Assistant United States Attorney

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