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THE LAW FIRM OF PUCKETT AND FARAJ, PC

17 December 2010

Via Email

Mr. Michael Martin
Assistant United States Attorney
211 West Fort St., Suite 211
Detroit, Michigan 48226-3211

Re: United States v. Hamama 08-20314; Defense expert witness

Dear Mr. Martin:

Pursuant to Fed.R.Cr.P. 16(b)(1)(c), the defense hereby provides notice that it intends to call Dr. Ibrahim Al-Marashi. Dr. Al-Marashi is an expert on the Iraqi Intelligence Service' and their tactics, techniques, and procedures.

Dr. Al-Marashi will testify about how the Iraqi Intelligence Service (IIS) maintained records of its informants and how the Service conducted background checks and loyalty oaths of its networks of its informants. Dr. Al-Marashi will testify how the IIS used fear and coercion of the fate of families within Iraq to recruit informants abroad. Dr. Al-Marashi will testify how IIS agents often exaggerated the number of recruited informants to satisfy their superiors.

Dr. Al-Marashi will testify how Iraqi embassies abroad conducted surveillance of Iraqi expatriate communities and reported on their activities. Dr. Al-Marashi, an Iraqi-American himself, will testify about his knowledge of the Iraqi community in the US and how the Iraqi government monitored these communities. Dr. Al-Marashi will base his testimony on his academic expertise and his continuous review of IIS documents since the year 2000.

Sincerely,

/S/ Haytham Faraj
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Encl: CV Dr. Al Marashi