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April 24, 2024

The Honorable Evelyn Padin, U.S.D.J.
United States District Court, District of New Jersey
50 Walnut Street, Suite 4015
Newark, NJ 07102

Re: USA v. Bader Alzahrani, Crim. No. 23 661 (EP)

Dear Judge Padin,

I submit this letter in response to the Text Order dated April 18, 2024. Pursuant to Section 4 of CIPA and Rule 16 (a)(1)(A) of the Federal Rules of Criminal Procedure, as part of the defense to this indictment, the defendant will seek to show that law enforcement agents and/or government agents followed defendant or had defendant under observation and surveillance in the months leading up to his arrest, which may have contributed to the defendant taking certain actions that lead to the charges against him. In support of this argument, defendant seeks any reports, photos, videos, audio recordings or transcripts thereof or any other information in the custody or control of the Government which may be relevant and helpful to the defense in regard to such material. US v. Yunis, 867 F. 2d 617 at 621 (D.C. Circuit 1989). Counsel is prepared to address any questions the Court may have regarding this request at a pretrial conference.

Respectfully submitted,



Frederica L. Miller
Counsel for Bader Alzahrani

cc: AUSA Benjamin Levin
Alan C. Lippel, Esq.