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U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 24, 2011

BY HAND

The Honorable John F. Keenan
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

RECEIVED
OCT 24 2011
JUDGE KEENAN'S CHAMBERS

Re: United States v. Manssor Arbabsiar
11 Cr. 897 (JFK)

Dear Judge Keenan:

On September 28, 2011, Magistrate Judge James C. Francis IV authorized a complaint bearing docket number 11 Mag. 2534 ("Sealed Complaint"), charging the above-listed defendant. The Sealed Complaint is attached hereto as Exhibit A.

On October 11, 2011, Magistrate Judge Michael H. Dolinger authorized an Amended Complaint (11 Mag. 2617) charging the defendant and Gholam Shakuri ("Amended Complaint"). By order of the Honorable Loretta A. Preska, dated October, 11, 2011, the Sealed Complaint was ordered to remain sealed. On October 11, 2011, the defendant was presented on only the Amended Complaint.

The Government respectfully requests that the Court enter a limited unsealing order permitting the Government to produce the Sealed Complaint in redacted form to defense counsel as part of the discovery process. The Sealed Complaint would otherwise remain sealed. A copy of the redacted Sealed Complaint is attached hereto as Exhibit B.

Consistent with the above, the Government respectfully

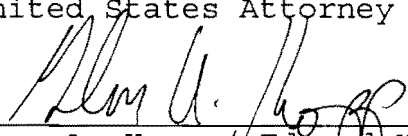
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requests that Exhibit A and Exhibit B to this letter be filed under seal should this letter be docketed.

Respectfully submitted,

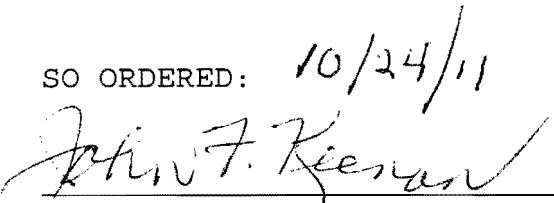
PREET BHARARA
United States Attorney

By:



Glen A. Kopp // Edward Y. Kim
Assistant United States Attorneys
(212) 637-2210 / 2401

SO ORDERED: 10/24/11



THE HONORABLE JOHN F. KEENAN
UNITED STATES DISTRICT JUDGE

Cc: The Honorable Loretta A. Preska
Chief United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

The Honorable George A. Yanthis
Chief United States Magistrate Judge
United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

Sabrina Shroff, Esq. (w/o Exhibits)