

**SUPPLEMENTAL  
EXHIBIT TO  
DISCLOSURE MOTION  
(CR-64)**

**Letter of May 29, 2014**



**U.S. Department of Justice**

*S. Amanda Marshall*

*United States Attorney*

*District of Oregon*

*1000 SW Third Avenue, Suite 600*

*(503) 727-1000*

*Portland, OR 97204-2902*

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May 29, 2014

Amy Baggio  
Assistant Federal Public Defender  
Suite 1700  
101 Southwest Main Street  
Portland, OR 97204

Re: *United States v. Reaz Kahn*  
Case No. 3:12-cr-659-MO

Dear Ms. Baggio:

I am the attorney-client privilege review attorney in *United States v. Kahn*. I am forwarding to you three items I have identified as attorney-client privileged material. These items are:

1. Recording of telephone call between R. Kahn and T. Nelson, Esq., 1/28/12, start time = 22:56:07, end time = 22:57:43, 714-749-9748 (single disk).
2. Recording of telephone call between R. Kahn and T. Nelson, Esq., 1/28/12, start time = 22:58:07, end time = 23:03:38, 714-749-9748 (single disk).
3. E-mail from T. Nelson, Esq. to [reaz2000@yahoo.com](mailto:reaz2000@yahoo.com), 1/28/12.

The prosecutors handling this case, AUSA Charles Gorder and AUSA Ethan Knight, have informed me they have not listened to either recorded telephone call and have not read the e-mail.

The case agent, FBI Special Agent Tom Bowen, may have become aware of the content of one or more of these items. To make sure you have an accurate understanding of the extent to which SA Bowen has been exposed to this material, I would like to arrange for you and your co-counsel to interview SA Bowen with me present. Please let me know how you would like to proceed with this.

Finally, AUSAs Gorder and Knight have not determined whether the three enclosed items are technically discoverable. Rather, these items are being disclosed to you because the AUSAs are mindful of the sensitivity associated with attorney-client privileged material and so you can address whatever effect these items have on the pending case.

Amy Baggio, AFPD

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Sincerely,

S. AMANDA MARSHALL

United States Attorney

A handwritten signature in black ink that reads "Seth D. Uram". The signature is written in a cursive, slightly slanted style.

Seth D. Uram

Assistant United States Attorney

Enclosures