

EXHIBIT D

L a w O f f i c e o f W a z h m a M o j a d d i d i

June 23, 2005

VIA FACSIMILE
916-554-2900

R. Steven Lapham
Assistant U.S. Attorney
United States Attorney's Office
501 I Street, Suite 10-100
Sacramento, CA 95814

Re: **United States v. Hamid Hayat**
 Cr.S-0240-GEB

Dear Mr. Lapham:

I sent you a discovery letter via hand delivery dated June 20, 2005. You acknowledged receipt of that letter during a telephone conversation with Johnny Griffin on June 21, 2005.

This letter is to supplement the discovery letter dated June 20, 2005. In the second paragraph of that letter, I specifically requested discovery from a number of government agencies. I would like to add the following government agencies to that list:

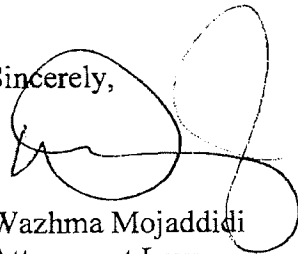
- Bureau of Customs and Border Security (BCBP)
- U.S. Citizenship & Immigration Services (USCIS)
- Bureau of Immigration & Customs Enforcement (ICE)
- Office of Immigration Statistics (OIS)
- U.S. Secret Service (USSS)
- Federal Protective Service (FPS)
- Transportation Security Administration (TSA)
- Federal Aviation Administration (FAA)
- U.S. Coast Guard (USCG)
- U.S. Attorneys
- Directorate of Intelligence
- DEA
- U.S. MARSHALL SERVICE
- ALCOHOL, TOBACCO, FIREARMS, and EXPLOSIVES (ATF)
- National Joint Terrorism Task Force (NJTTF)
- Foreign Terrorist Tracking Task Force (FTTTF)
- Office of Law Enforcement Coordination
- National Intel Share (NIS) Project (St. Louis Pilot)
- U.S. National Central Bureau-Interpol

Bureau of Prisons
Executive Office for Immigration Review
Office of Intelligence Policy and Review
National Drug Intelligence Center
National Institute of Justice
IRS
Deputy Assistant Secretary Terrorism and Financial Intelligence
Office of Foreign Assets Control
Designation Lists & Financial Advisories
Financial Crimes Enforcement Network (FINCEN)
DEPARTMENT of COMMERCE:
Office of Security
Defense Intelligence Agency
Defense Security Service
National Imagery & Mapping Agency
National Security Agency
California Department of Homeland Security
California Department of Justice and Bureau of Investigation
FBI's Joint Terrorism Task Forces in Sacramento
FBI's Joint Terrorism Task Forces in Fresno
San Joaquin County Sheriff's Office
Sacramento County Sheriff's Office
California Highway Patrol (CHP)

Please note that this list is not an exhaustive one and the discovery is requested from ALL government agencies.

Thank you in advance for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wazhma Mojaddidi'. The signature is stylized with a large loop on the right side and a horizontal line across the middle.

Wazhma Mojaddidi
Attorney at Law