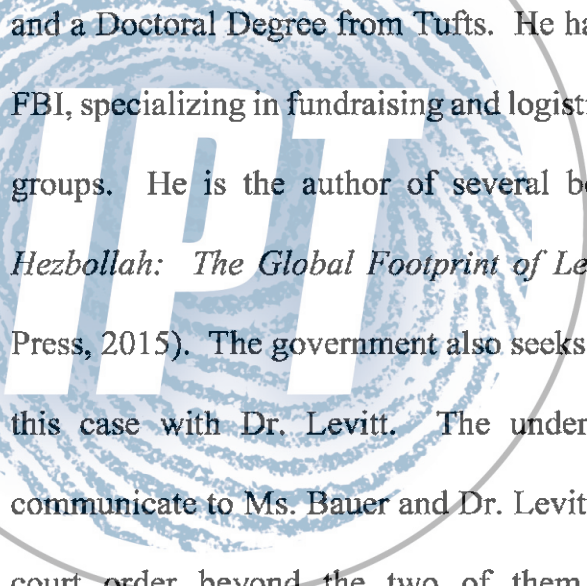


“Prince Sam” Hamade, Samir Ahmed Berro, a/k/a “Tony,” and Issam Hamade were indicted on one count of conspiring with each other, and with others, contrary to Title 18, United States Code, Section 371, to violate the International Emergency Economic Powers Act and the Export Administration Regulations, and to Violate the Arms Export Control Act and the International Traffic in Arms Regulations. Defendant Usama Hamade was also charged with smuggling, in violation of Title 18, United States Code, Section 554.

The grand jury has alleged that the three defendants, from 2009 to 2013, conspired with each other, and with others known and unknown, to buy parts for unmanned aerial vehicles (commonly called either “UAVs” or “drones”) from U.S. suppliers, and then to export those parts, in violation of U.S. law, to Hizballah, which is designated as a “foreign terrorist organization” pursuant to Title 8, United States Code, Section 1189. Defendants Usama Hamade and Berro have also obtained technology from non-U.S suppliers, and have forwarded that non-U.S. technology to Hizballah.

At the Washington Institute for Near East Policy, Ms. Bauer works with another expert on illicit finance, proliferation, and Hizballah. Dr. Matthew Levitt is a former Deputy Assistant Secretary of the Treasury for Intelligence and Analysis, in which capacity he supervised the unit within which Ms. Bauer worked. Dr. Levitt has an undergraduate degree from Yeshiva University, a Master’s Degree in Law and Diplomacy from Tufts,

the First Superseding Indictments charged defendants Berro and Usama Hamade with conspiring to violate the export control laws of the United States. The Second Superseding Indictment added a third defendant, Issam Hamade, and added a charge of smuggling, in violation of 18 U.S.C. § 554, against defendant Usama Hamade.



and a Doctoral Degree from Tufts. He has worked as a counterterrorism analyst with the FBI, specializing in fundraising and logistical support networks for Middle Eastern terrorist groups. He is the author of several books, including, most pertinently to this case, *Hezbollah: The Global Footprint of Lebanon's Party of God* (Georgetown University Press, 2015). The government also seeks to have Ms. Bauer allowed to discuss matters in this case with Dr. Levitt. The undersigned Assistant United States Attorney will communicate to Ms. Bauer and Dr. Levitt that dissemination of materials covered by this court order beyond the two of them is strictly forbidden, and that unauthorized dissemination of these materials carries very serious potential penalties.

CONCLUSION

For the foregoing reasons, the United States respectfully asks that this Court enter an Order permitting the government to share with Ms. Bauer and Dr. Levitt a copy of the Second Superseding Indictment, the affidavit in support of extradition of Assistant U.S. Attorney John Docherty, and the affidavit in support of extradition of Federal Bureau of Investigation Special Agent Steven Warfield.

Dated: October 16, 2017

Respectfully Submitted,

GREGORY G. BROOKER
Acting United States Attorney



BY: JOHN DOCHERTY
Assistant United States Attorney
Attorney Reg. No. 017516X