

1 ANDRÉ BIROTTE JR.
 United States Attorney
 2 ROBERT E. DUGDALE
 Assistant United States Attorney
 Chief, Criminal Division
 3 SUSAN J. DE WITT (Cal. Bar No. 132462)
 4 CHRISTOPHER D. GRIGG (Cal. Bar No. 220243)
 Acting Deputy Chief, National Security Section
 5 ALLEN W. CHIU (Cal. Bar No. 240516)
 Assistant United States Attorney
 6 National Security Section
 1300 United States Courthouse
 7 312 North Spring Street
 Los Angeles, California 90012
 8 Telephone: (213) 894-4496/5429
 Facsimile: (213) 894-6436
 9 E-mail: susan.dewitt@usdoj.gov
 christopher.grigg@usdoj.gov
 10 allen.chiu@usdoj.gov

11 Attorneys for Plaintiff
 12 UNITED STATES OF AMERICA

13 UNITED STATES DISTRICT COURT
 14 FOR THE CENTRAL DISTRICT OF CALIFORNIA
 15 EASTERN DIVISION
 16

17 UNITED STATES OF AMERICA,
 18 Plaintiff,
 19 v.
 20 SOHIEL OMAR KABIR, et al.,
 21 Defendants.
 22

ED No. CR 12-00092(B)-VAP
GOVERNMENT'S WITNESS LIST

23 Plaintiff United States of America, through its counsel of
 24 record, the United States Attorney for the Central District of
 25 California, hereby submits its list of witnesses the government
 26 intends to call at trial to testify in its case-in-chief.
 27 Because investigation in this matter is ongoing, the government
 28 reserves the right to amend this list to include additional

1 witnesses at a later time as may be necessary. Specifically,
2 the government reserves the right to call additional witnesses
3 to testify both in its case-in-chief and as rebuttal witnesses.
4 Should the government become aware of the need to call such
5 additional witnesses prior or during trial, the government will
6 promptly notify the Court and defense counsel of any additional
7 witnesses.

8 Dated: July 28, 2014

Respectfully submitted,

9 ANDRÉ BIROTTE JR.
United States Attorney

10 ROBERT E. DUGDALE
11 Assistant United States Attorney
12 Chief, Criminal Division

13 _____ /s/ _____
14 SUSAN J. De WITT
15 CHRISTOPHER D. GRIGG
16 ALLEN W. CHIU
17 Assistant United States Attorneys
18 Attorneys for Plaintiff
19 UNITED STATES OF AMERICA
20
21
22
23
24
25
26
27
28

GOVERNMENT'S WITNESS LIST

United States v. Sohiel Omar Kabir, et al.,

ED No. CR 12-00092(B)-VAP

1. Task Force Officer ("TFO") Schyler Beaty
2. Federal Bureau of Investigation ("FBI") Special Agent ("SA") Martin Burry
3. Confidential Human Source ("CS")¹
4. Arifeen David Gojali
5. Miguel Alejandro Santana Vidriales
6. Patrice Edwards, Passport Processor
7. FBI SA Mark Espiritu
8. FBI SA John Fulford
9. Tim Garcia, FBI, Orange County Regional Computer Forensics Laboratory ("OCRCFL")
10. Craig Goldsmith, OCRCFL
11. FBI SA John Sedor
12. FBI SA Justin Kempf
13. Evan F. Kohlmann, Global Flashpoint Partners
14. TFO Jose Peralta
15. FBI SA Demosthenes Lao
16. FBI SA Scott P. Hill
17. FBI SA Wade Lee

¹ On August 2, 2013, the Court issued a Protective Order governing discovery that, among other things, imposed steps to protect the safety of the CS. Counsel has informed the government that the identity of the CS is known to them. At this stage of the proceedings, therefore, the government declines to specifically identify the name of the CS in this publicly-filed witness list.

- 1 18. FBI SA Nathan T. Elias
2 19. FBI SA Joseph E. Sirko
3 20. FBI SA Jeffrey T. Stiff
4 21. FBI Center Operations Specialist Kit M. Wilson
5 22. FBI SA Sergio Lopez
6 23. Michael McFarlane, FBI, Quantico, Virginia
7 24. Tara McFarlane
8 25. Paul S. Mueller, FBI, Supervisory SA, Data Intercept
9 Technology Unit
10 26. FBI SA Michael Nader
11 27. FBI SA Theodore Nevatt
12 28. Nhan T. Nguyen, FBI, OCRCFL
13 29. Sharon Nordal, FBI, Evidence Technician
14 30. United States Department of State, Diplomatic Security
15 Service SA Michael Peart
16 31. Arnell H. Rivera, FBI, OCRCFL
17 32. Department of Homeland Security, Customs and Border
18 Protection Officer Xiomara Rodriguez-Lopez
19 33. FBI Supervisory SA Todd Spota
20 34. FBI SA David Staab
21 35. Christian Velasco, Passport Processor
22 36. Patrick B. Bowens, FBI, Unit Chief,
23 Telecommunications, Intercept, and Collection Technology Unit
24 37. FBI SA Nicholas Vicencia
25 38. Ahmad Abdallah
26
27
28

1 39. Custodians of Records²:

- 2 - Nolan Avery, Custodian of Record from LAX Firing
- 3 Range
- 4 - Esther Martinez, Custodian of Record from Los
- 5 Angeles Gun Club
- 6 - Jacob Lentz, Custodian of Record from SC Village
- 7 Paintball
- 8 - William Mackintosh, Custodian of Record from Western
- 9 Union
- 10 - Connie Basham, Custodian of Record from AT&T
- 11 - Tiffany Reed, Custodian of Record from AT&T
- 12 - Nicole Blumenfeld, Custodian of Record from Tumblr
- 13 - Shannon Chance, Custodian of Record from Facebook,
- 14 Inc.
- 15 - Christine Kalaveshi, Custodian of Record from
- 16 Facebook, Inc.
- 17 - Peggy Moore, Custodian of Records from U.S. Bank
- 18 - Erin O'Neil, Custodian of Record from Yahoo!
- 19 - Emily Nick, Custodian of Record from Yahoo!
- 20 - Casey Cox, Custodian of Record from 24 Hour Fitness
- 21 - Eric Ho, Custodian of Record from Google, Inc.

23 ² The government will be filing in advance of trial a
24 notice of intent to offer evidence pursuant to Rule 902(11) of
25 the Federal Rules of Evidence regarding the admission of
26 business records which will cover most, if not all, of these
27 witnesses. Accordingly, the government may not need to call
28 several of these witnesses to testify at trial. Nonetheless,
the government includes these individuals on its witness list in
the event that it is necessary to call them as percipient or
foundational witnesses at trial.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- Jennifer stone, Custodian of Record from Google
- Mika Yukimura, Custodian of Record from Google
- Jasmin Stedman, Custodian of Record from Green Dot Bank
- Rubert Suter, Custodian of Record from Time Warner
- Michael Armellino, Custodian of Record from T-Mobile
- George Costent, Custodian of Record from T-Mobile
- Barbara Smith, Custodian of Record from Sprint
- Nancy Staffaroni, Custodian of Record from Wells Fargo
- James Fonovich, Custodian of Record from Cheapoair/Fareportal