
EXHIBIT “J”

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Case No. 04-CR-402(TJM)

v.

YASSIN MUHIDDIN AREF and
MOHAMMED MOSHARREF
HOSSAIN,

Defendants.

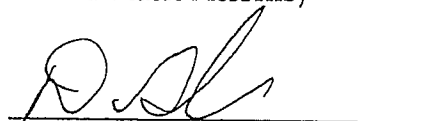
NOTICE OF SUBMISSION OF
GOVERNMENT'S FIRST
IN CAMERA, EX PARTE,
UNDER SEAL FILING
PURSUANT TO THE
CLASSIFIED INFORMATION
PROCEDURES ACT

The government hereby gives notice of submission of the Government's First In
Camera, Ex Parte, Under Seal Filing Pursuant To The Classified Information Procedures
Act.

Respectfully submitted this 8th day of November, 2004.

GLENN T. SUDDABY
United States Attorney

By:



David M. Grable
Assistant U.S. Attorney
N.D.N.Y. Bar Roll No. 105607

Of Counsel:

Gregg N. Sofer
Counterterrorism Section
Department of Justice

Gregory A. West
Assistant U.S. Attorney
N.D.N.Y. Bar Roll No. 501530

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Case No. 04-CR-402(TJM)

v.

YASSIN MUHIDDIN AREF and
MOHAMMED MOSHARREF
HOSSAIN,

Defendants.

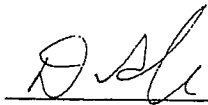
NOTICE OF SUBMISSION OF
GOVERNMENT'S SECOND
IN CAMERA, EX PARTE,
UNDER SEAL FILING
PURSUANT TO THE
CLASSIFIED INFORMATION
PROCEDURES ACT

The government hereby gives notice of submission of the Government's Second In
Camera, Ex Parte, Under Seal Filing Pursuant To The Classified Information Procedures
Act.

Respectfully submitted this 12th day of January, 2005.

GLENN T. SUDDABY
United States Attorney

By:



David M. Grable
Assistant U.S. Attorney
N.D.N.Y. Bar Roll No. 105607

Of Counsel:

Gregg N. Sofer
Counterterrorism Section
Department of Justice

Gregory A. West
Assistant U.S. Attorney
N.D.N.Y. Bar Roll No. 501530

~~SECRET~~

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Case No. 04-CR-402 (TJM)

v.

YASSIN MUHIDDIN AREF and
MOHAMMED MOSHARREF
HOSSAIN,

GOVERNMENT'S THIRD
IN CAMERA, EX PARTE,
UNDER SEAL FILING
PURSUANT TO THE
CLASSIFIED INFORMATION
PROCEDURES ACT

Defendants.

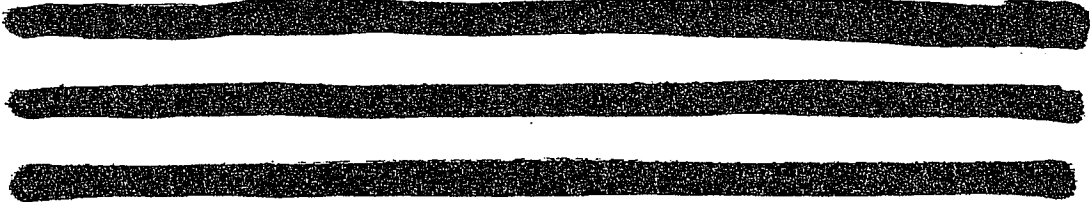
The United States of America, by and through its counsel of record, the United States Attorney for the Northern District of New York, hereby submits its Third In Camera, Ex Parte, Under Seal Filing Pursuant To The Classified Information Procedures Act, and more fully states as follows:

1. This filing describes information classified at least at the "Secret" level. Under Executive Order 13,292, the unauthorized disclosure of information classified at the "Secret" level, by definition, reasonably could be expected to cause serious damage to the national security of the United States. Exec. Order No. 13,292, 68 Fed. Reg. 15,315 (Mar. 25, 2003).

~~SECRET~~

2. The government is therefore submitting this filing to the Court *in camera, ex parte*, and under seal, and requests that the Court file this document with the Court Security Officer or his designee, pursuant to the Protective Order issued by this Court.¹

3. The government is submitting this filing to (a) provide the Court with a status report about the government's progress in reviewing certain materials to ensure that it complies with its discovery obligations in this case; and (b) request an additional three (3) month continuance and exclusion of time from the Speedy Trial clock to allow that review to be completed. In support of the latter request, the government relies, in part, upon classified information that it previously provided to the Court *in camera, ex parte*, and under seal.

4. 

¹Counsel for the government has only been given authorization to disclose this information in this format, *i.e.* in an *in camera, ex parte*, under seal presentation to the Court that will be handled and stored as "Secret" classified material, and will not be disclosed to defense counsel. The government intends to electronically file, contemporaneous with this submission, a notice that states – without disclosing the contents of this filing – that the government has made an *in camera, ex parte* submission under seal pursuant to the Classified Information Procedures Act.

[REDACTED]

[REDACTED]

5.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Based on those figures, counsel for the government estimate that,

barring any unforeseen circumstances, we will need approximately three (3)

additional months to complete our review of all of this material. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The details provided in this progress report are thus similarly

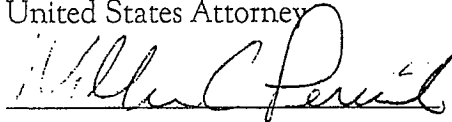
classified.

7. The government is prepared to provide the Court with additional *in camera, ex parte*, under seal pleadings and/or oral presentations, about the government's future progress in this review, at any time that the Court desires. Moreover, should the Court desire additional information at this time, we would be happy to participate in an *in camera, ex parte*, discussion with the Court regarding these issues, at any time convenient for the Court.

Respectfully submitted this 11th day of April, 2005.

GLENN T. SUDDABY
United States Attorney

By:



William C. Pericak
Assistant U.S. Attorney
N.D.N.Y. Bar Roll No. 102352

Gregory A. West
Assistant U.S. Attorney
N.D.N.Y. Bar Roll No. 501530

Of Counsel:

Gregg N. Sofer
Counterterrorism Section
Department of Justice