

**Rachelle Barbour**

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**From:** Rachelle Barbour  
**Sent:** Sunday, January 26, 2020 2:22 PM  
**To:** 'CRM FOIA (CRM)'  
**Subject:** FOIA Request - Expedited Processing Requested  
**Attachments:** Ameen Letters Rogatory Turkey Response Jan 23.pdf; Translation of May 17 2019 Turkcell response from Turkish Govt.pdf; Ameen Certification of ID.pdf; DOJ FOIA FOR INFO RE TURKISH LETTER.pdf

Dear Ms. Marchand Jones:

Another issue has come up requiring a FOIA. I hope that since our current FOIA to DOJ has been expedited, that this one will be as well, as it is even more critical that we present this information to the Court as soon as possible.

I am attaching:

1. The FOIA Request
2. Exhibit A – The Response by the Turkish Government to DOJ, CRM, OIA
3. Exhibit B – An English Translation of that Response
4. Omar Ameen’s Executed Certification of Identity and Waiver of Privacy Rights

I would appreciate a confirmation from your office that this has been received and that the documents will be provided. Please contact me with any questions or concerns.

Thank you very much for your attention to this matter.

Rachelle

Rachelle Barbour  
Assistant Federal Defender  
Federal Defender's Office  
801 I Street, 3rd Floor  
Sacramento, CA 95814  
916-498-5700  
Fax: 916-498-5710

This e-mail contains PRIVILEGED and CONFIDENTIAL information intended only for the use of the addressee(s) named above. If you are not the intended recipient of this e-mail, or an authorized employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please notify us by reply e-mail. Thank you for your cooperation.



**OFFICE OF THE FEDERAL DEFENDER**  
Eastern District of California  
801 I Street, 3<sup>rd</sup> Floor  
Sacramento, California 95814-2510  
(916) 498.5700 FAX (916) 498.5710

**HEATHER E. WILLIAMS**  
Federal Defender

**BENJAMIN D. GALLOWAY**  
Chief Assistant Defender

January 26, 2020

Amanda Marchand Jones, Chief  
FOIA/PA Unit  
Criminal Division  
Department of Justice  
Suite 1127, Keeney Building  
Washington, DC 20530-0001

Submitted by email: [crm.foia@usdoj.gov](mailto:crm.foia@usdoj.gov)

Re: FOIA to DOJ, Office of International Affairs Regarding Attached Correspondence Received by OIA from Republic of Turkey

Dear Ms. Marchand Jones:

Under the Freedom of Information Act, 5 U.S.C. subsection 552, I am requesting access to the following documents:

Documents held by the Department of Justice in any division, but especially the Criminal Division, especially the Office of International Affairs, regarding the attached correspondence (Exh. A) – a letter to DOJ, CRM, OIA, received from the Republic of Turkey on or about May 17, 2019, regarding a letter rogatory sent by the District Court of the Eastern District of California (via my office) to the Turkish Ministry of Justice, General Directorate of International Law and Foreign Relations. The letter rogatory is at Exhibit A, pages 2-10 attached to the Turkish correspondence. The Turkish correspondence to DOJ, CRM, OIA, bears what appears to be two handwritten, internal DOJ CRM tracking numbers: CRM 182-69187, and CRM 182-67189. At Exhibit B is an English translation of the Turkish letter. In requesting such documents, I specifically request all communications between any staff of the Department of Justice and the any component of the Republic of Turkey, the Republic of Iraq, and/or the Department of State, or any other entity, regarding the May 17, 2019 letter from the Republic of Turkey, date stamps or other notations placed on that letter or any envelope received, a full copy of the letter, the envelope, and any attachments, logs regarding such letter, internal emails regarding the letter, and how the letter was processed at the DOJ. I also request records and logs of all such communications and processing.

### **Definitions**

Communications: The term “communications” includes, but is not limited to: letters, e-mails; text communications between phones or other electronic devices (including but not limited to, communications sent via SMS or other text, Blackberry Messenger, iMessage, WhatsApp, Signal, Gchat, or Twitter direct message); images, video, and audio recorded on cell phones; voicemail messages; social-media posts; formal and informal presentations; alerts; bulletins; advisories; and minutes or notes of meetings and phone calls.

“Component of the Republic of Iraq” includes any member of any Iraqi security force, military branch, governmental agency, People’s Mobilization Force, police agency, diplomatic agency, elected or appointed member of government, court or tribunal, or any other branch of the Iraqi Government.

“Component of the Republic of Turkey” includes any unit of the Turkish Ministry of Justice, the Turkish Public Prosecutor, any Turkey security force, military branch, governmental agency, police agency, diplomatic agency, elected or appointed member of government, court or tribunal, or any other branch of the Turkish Government.

Records: The term “records” includes, but is not limited to: legal memoranda, procedures, policies, directives, practices, reports, audits, guidance, or guidelines that were prepared, received, transmitted, collected, and/or maintained by Subject Agency

### **Relevant Time Frame**

This request seeks documents, records, and communications that have been created or occurred since February 22, 2019, the date the letter was conveyed to the Turkish Ministry of Justice.

### **Privacy Waiver Signed by Mr. Ameen**

I represent Mr. Ameen in his current extradition case, and am enclosing an executed and notarized waiver of privacy rights in any of these documents. This waives Mr. Ameen’s rights to privacy under Exemption 6 and other Exemptions protecting his personal privacy.

As FOIA requires, please release all reasonably segregable nonexempt portions of documents. If this request is denied in whole or in part, we ask that you justify all withholdings by reference to specific exemptions to the FOIA. We expect the release of all segregable portions of otherwise exempt material. If the fee waivers are denied, the requesters are prepared to pay fees up to \$25, and request to be informed of further fees that may be charged, but reserve the right to appeal a denial of fee waivers

In order to help you determine my status for the purpose of assessing fees, I note that I am an attorney with the Federal Defender’s Office for the Eastern District of California. The Office of the Federal Defender is authorized under Title 18, U.S.C. section 3006A, the Criminal

Justice Act, to provide legal representation to persons financially unable to retain counsel in federal criminal and related proceedings. I request a waiver of all fees for this request. Disclosure of the requesting information to me is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not in any commercial interest.

I am willing to pay fees for this request up to a maximum of \$100. If you estimate that the fees will exceed this limit, please inform me first.

I request that the information be provided in electronic format.

**Request for Expedited Processing**

I ask that my request receive expedited processing because Mr. Ameen currently faces extradition to the Republic of Iraq. This letter is dated May 17, 2019, and was produced to my office on January 23, 2020, by the Department of State for the first time. On January 24, 2020, I filed a Status Report in our extradition case regarding the letter. I need to update the District Court on why the letter took eight months to be conveyed to the Defense and why the Department of Justice did not convey the Turkish request to the Defense or the Court.

Both Mr. Ameen and the public have an interest in expedited processing of this request. There has been significant, ongoing public interest in this case, as shown by multiple international articles and news stories, including in the New Yorker (January 20, 2020), CBS News, the San Francisco Chronicle, Sacramento Bee, on ABC10, and in the New York Times. Likewise, a television news channel, KXTV has filed a FOIA civil suit documenting its interest in providing the public with information about Mr. Ameen's case. (U.S. District Court, E.D. Cal., Case No. 2:19-CV-415-JAM.) Moreover, Mr. Ameen faces "grave punishment" in this proceeding, and the information produced is expected to help in his defense. Aguilera v. FBI, 941 F.Supp. 144, 150 (D.D.C. 1996).

I look forward to receiving the documents as quickly as possible. If you have any questions about this request, please email me at [Rachelle\\_Barbour@fd.org](mailto:Rachelle_Barbour@fd.org) or call me at 916-498-5700.

Sincerely,



Rachelle Barbour  
Assistant Federal Defender

Enc. (privacy waiver)

AT  
MI



T.C.  
ADALET BAKANLIĞI  
Dış İlişkiler ve Avrupa Birliği Genel Müdürlüğü  
(Ceza İstinabe ve Tebligat Bürosu)

Republic of Turkey  
Ministry of Justice  
Directorate General for Foreign Relations and European Union Affairs

République de Turquie  
Ministère de la Justice  
Direction Générale des Relations Extérieures et des Affaires de  
l'Union Européenne

Our Ref : 14838002-4-2-USA-16-2019-E.19198/55229

17/05/2019

Subject : Omar Abdulsattar AMEEN

A.B.D. Adalet Bakanlığı  
Uluslararası İlişkiler Ofisi  
Ceza Bölümü  
1301 New York Avenue  
N. W., 8th Floor  
Washington, D. C. 20530  
U.S.A

İlgi : 22/02/2019 tarihli mail ekinde alınan Amerika Birleşik Devletleri Kaliforniya Bölge Mahkemesinin 05/02/2019 tarihli ve 18-MJ-00152-EFB sayılı yazıları.

İlgi yazınız ekinde alınan adli yardımlaşma evrakıyla; "vizelerin, izinlerin ve diğer belgelerin sahtekarlığı ve kötüye kullanılması" ile "yalan beyanda bulunma" suçlarından Omar Abdulsattar AMEEN hakkında yürütülen soruşturma kapsamında, suçluların iadesi işleminde kullanılmak üzere adı geçen ile ilgili bir kısım bilgi ve belge talebinde bulunmaktadır.

İlgi yazı ile talep edilen hususun, uluslararası adli yardımlaşma talebi niteliğinde olduğu anlaşılmıştır. Ülkemiz ile ABD arasındaki cezai konularda adli iş birliği, "Türkiye Cumhuriyeti ile Amerika Birleşik Devletleri Arasında Suçluların Geri Verilmesi ve Ceza İşlerinde Karşılıklı Adli Yardım Antlaşması" uyarınca yerine getirilmektedir. Antlaşmanın 38. maddesinde adli yardımlaşma taleplerinin yalnızca yetkili makamlar vasıtasıyla yapılabileceği hüküm altına alınmıştır. Bu nedenle, ekte gönderilen adli yardımlaşma evrakının, Amerika Birleşik Devletleri Adalet Bakanlığı aracı kılınarak, Türkiye Cumhuriyeti Adalet Bakanlığı'na gönderilmesi halinde gereğine tevessül edilebilecektir.

Bilgilerinize arz ve bu vesileyle saygılarımızı bir kez daha teyit ederiz.

Gökhan ERDOĞAN  
Hâkim  
Daire Başkanı

EK: Takım Evrak

67189  
CRM 182-69187



Milli Müdafaa Caddesi No: 22 Bakanlıklar / ANKARA Ayrıntılı bilgi için irtibat telefonu: (0 312) 414 88 36  
Faks: (0 312) 219 45 23 e-posta: uhdigm@adalet.gov.tr Elektronik Ağ: www.adalet.gov.tr

UYAP Bilişim Sistemindeki bu dokümana <http://vatandas.uyap.gov.tr> adresinden Fy2LYEC - iaLRx7j - Y9LbAAY - 998YSU= ile erişebilirsiniz.


UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

IN RE OMAR ABDULSATTAR AMEEN  
DOCKET NUMBER 2:18-MJ-00152-EFB

I hereby certify that the annexed instrument is a true and correct copy of the original on file in my office.

ATTEST: MARIANNE MATHERLY

Clerk, U. S. District Court  
Eastern District of California

By:   
Deputy Clerk

Dated: 2/25/19

**REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE  
(LETTER ROGATORY)**

The District Court of the United States of America, Eastern District of California, presents its compliments to the appropriate judicial and administrative authorities of the Republic of Turkey, and requests international judicial assistance to obtain evidence to be used in an extradition proceeding before this Court in the above-captioned matter. A hearing on this matter is scheduled at present for the 29<sup>th</sup> of April, 2019, in Sacramento, California, United States.

This Court requests the assistance described herein as necessary in the interests of justice. The assistance requested is that the appropriate judicial or administrative authority of the Republic of Turkey authorize the following Turkish government agency to aid this Court in obtaining documents held regarding Omar Abdulsattar Ameen:

This Court requests that the Ministry of Justice and the Office of the Public Prosecutor aid it in obtaining evidence from:

Turkcell İletişim Hizmetleri A.Ş  
Turkcell Küçükyalı Plaza  
Aydınevler Mahallesi İnönü Caddesi No:20  
Küçükyalı Ofispark B Blok - Maltepe  
İSTANBUL Turkey 34840

This Court offers the following identification information in order to aid in obtaining the requested documents.

Mr. Ameen's Turkish identification number (kimlik): 99247350122,  
Date of Birth: December 20, 1973  
Iraqi passport number: G1975150  
Turkcell phone number: 05-34 068 5280  
Turkcell contract number: HBP49168419  
Turkcell SIM card no.: 899001 110816085280  
Turkcell Cell Phone IMEI No.: 353005398405222

(Copies of Mr. Ameen's Turkish identity card, Iraqi passport, and Turkcell contract are attached.)

The request is for cell phone records for the period of time of May 2014 through August 2014 for the above cell phone number, SIM card, and handset. This Court requests that records be obtained that include usage records for this period of time for calls, texting, and data, and for any location data, including cell-site location data.

Mr. Ameen was a registered refugee living in Mersin, Turkey from 2012 to 2014. This request is made pursuant to a submission by Mr. Ameen, who seeks these documents to aid his defense. The Court asks that the requested documents be provided in the manner that they are held in the original file. The Court asks that correspondence regarding this request be referred to the Office of the Federal Defender, 801 I St., 3<sup>rd</sup> Floor, Sacramento, CA 95814 USA, care of Chief Assistant Federal Defender Benjamin Galloway at Ben\_Galloway@fd.org.

**Facts**

Mr. Ameen is charged in the Republic of Iraq with murder a committed in June 2014. Mr. Ameen has been a resident refugee in the United States of America since November 2014. He lived in the Republic of Turkey from early 2012 until November 2014. Mr. Ameen has indicated that he did not leave Turkey in June 2014. Mr. Ameen's defense team believes that cell phone data from this time will aid in supporting his defense. A defense investigator has spoken with staff at Turkcell to confirm that the information exists.

**Reciprocity**

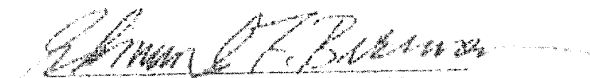
This Court is available to provide you reciprocal assistance at your request.

**Reimbursement for costs**

The requesting office, the Office of the Federal Defender, is able to repay costs incurred by your court or agency in obtaining these records. Please provide cost requests to the Office of the Federal Defender, 801 I St., 3<sup>rd</sup> Floor, Sacramento, CA 95814 USA, care of Chief Assistant Federal Defender Benjamin Galloway at Ben\_Galloway@fd.org.

Respectfully submitted,

Dated: February 5, 2019

  
HON. EDMUND F. BRENNAN  
UNITED STATES MAGISTRATE JUDGE  
SACRAMENTO, CALIFORNIA, USA

AMERİKA BİRLEŞİK DEVLETLERİ BÖLGE MAHKEMESİ  
KALİFORNİYA DOĞU BÖLGESİ

Ekteki belgenin ofisimdeki dosyadaki belgenin gerçek ve doğru bir kopyası olduğunu onaylıyorum.  
BEYAN EDEN: MARIANNE MATHERLY

OMAR ABDULSATTAR AMEEN HAKKINDA  
ESAS NO 2:18-MJ-00152-EFB

Katip, ABD Bölge Mahkemesi  
Kaliforniya Doğu Bölgesi  
Katip Yardımcısı  
İmza  
Tarih: 5/2/2019

ULUSLARARASI ADLİ YARDIM İSTEĞİ  
(YETKİ VERME YAZISI)

Amerika Birleşik Devletleri Bölge Mahkemesi, Kaliforniya Doğu Bölgesi, Türkiye Cumhuriyeti'nin uygun yargı ve yönetim yetkililerine saygılarını sunar ve bu Mahkeme önünde, yukarıda başlıkta bildirilen konu hakkında bir suçluların iadesi işlemi için kullanılacak üzere kanıt elde etmek için uluslararası adli yardım isteğinde bulunur. Şu anda bu konuyla ilgili bir duruşmanın, 29 Nisan 2019'de, Sacramento, Kaliforniya, Amerika Birleşik Devletleri'nde yapılması kararlaştırılmıştır.

Bu Mahkeme, adaletin tecellisi adına, burada belirtilen yardımı rica etmektedir. İstenilen yardım, Türkiye Cumhuriyeti'nin uygun yargı ve yönetim yetkililerinin aşağıdaki Türk resmi kurumuna, bu Mahkemenin Omar Abdulsattar Ameen ile ilgili belgeleri elde etmesine yardım etmesi için yetki vermesidir.

Bu Mahkeme, Adalet Bakanlığı ve Savcılık Makamı'nın aşağıdaki adresten delil toplanmasına yardımcı olmasını rica etmektedir:

Türkcell İletişim Hizmetleri A.Ş. Türkcell Küçükyalı Plaza  
Aydınevler Mahallesi İnönü Caddesi No:20 Küçükyalı Ofispark B Blok - Maltepe İSTANBUL Türkiye  
34840

Bu Mahkeme, talep edilen belgeleri ele geçirmekte yardım konusunda aşağıdaki kimlik bilgilerini sunmaktadır:

Bay Ameen'in Türkiye Cumhuriyeti kimliği (kimlik): 99247350122, Doğum Tarihi: 20 Aralık 1973  
Irak pasaportu numarası: G1975150  
Türkcell telefon numarası: 05-34 068 5280  
Türkcell kontrat numarası: HBP49168419  
Türkcell SIM kart numarası: 899001 110816085280  
Türkcell Cep Telefonu IMEI Numarası: 353005398405222 (Bay Ameen' in Türk nüfus kağıdının, Irak pasaportunun ve Türkcell kontratının kopyaları ektedir.)



Yukarıdaki cep telefonu numarası, SIM kartı ve aygıtının 2014 Mayıs ila 2014 Ağustos arasındaki dönemdeki cep telefonu kayıtları talep edilmektedir. Bu Mahkeme, bu dönem içindeki telefon konuşmaları, mesajlar ve veri ve hücre alanı konumu verisi dahil, herhangi bir konum verisi kullanım kayıtlarını içeren kayıtları talep etmektedir.

Bay Ameen, 2012 ile 2014 arasında Türkiye'nin Mersin kentinde oturan kayıtlı bir sığınmacıydı. Bu talep, Bay Ameen'in savunmasına yardım etmesi üzere kendi talebi doğrultusunda yapılmaktadır. Mahkeme, istenilen belgelerin özgün dosyada saklandıkları şekliyle sağlanmasını rica eder. Mahkeme, bu istekle ilgili yazışmaların şuraya yönlendirilmesini rica eder: Office of the Federal Defender, 801 I St., 3<sup>rd</sup> Floor, Sacramento, CA 95814 USA, care of Chief Assistant Federal Defender Benjamin Galloway e-posta: Ben\_Galloway@fd.org.

#### **Olgular**

Bay Ameen, Irak Cumhuriyeti'nde Haziran 2014'de işlenen bir cinayetle suçlanmaktadır. Bay Ameen, Kasım 2014'den beri Amerika Birleşik Devletleri'nde yaşayan bir göçmendir. 2012'nin başından Kasım 2014'e kadar Türkiye Cumhuriyeti'nde oturmuştur. Bay Ameen, Haziran 2014'de Türkiye'den ayrıldığını bildirmiştir. Bay Ameen'in savunma ekibi, bu döneme ait cep telefonu verilerinin savunusunu destekleyeceğine inanmaktadır. Bir savunma soruşturmacısı, bu bilgilerin var olduğunun onayını almak için Türkcell'deki elemanlarla konuşmuştur.

#### **Karşılık**

Bu Mahkeme, istekte bulunmanız halinde size karşılık olarak yardım sağlayabilir.


#### **Masrafların geri ödenmesi**

İstekte bulunan büro olan, Federal Savunucu'nun Bürosu, mahkemeniz ya da kurumunuzun bu kayıtları elde ederken yaptıkları masrafları size geri ödeyebilir. Lütfen masraf isteklerini şuraya gönderin: Office of the Federal Defender, 801 I St., 3<sup>rd</sup> Floor, Sacramento, CA 95814 USA, care of Chief Assistant Federal Defender Benjamin Galloway e-posta: Ben\_Galloway@fd.org.

Bilgilerinize rica ederim.

YARGIÇ EDMUND F. BRENNAN


Tarih: 5 Şubat 2019

  
AMERİKA BİRLEŞİK DEVLETLERİ SULH  
HAKİMİ, KALİFORNİYA, A.B.D.

## Translator's Declaration

I, Sybil Cayir, declare under penalty of perjury that I understand the Turkish language and the English language; that I am a member of the American Translators Association for translation, also registered translator/interpreter for Turkish language by the Judicial Council of California with I.D. number #700599, also contract language officer of Turkish for U.S. State Department; and qualified for the Federal Court system to interpret all U.S. Court documents, I am also language officer for Turkish language for U.S. Defense Department, and that, to the best of my knowledge and belief, the attached text titled "REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE (LETTER ROGATORY) dated 2/5/2019 have the same meanings as the attached translated Turkish language document titled "ULUSLARARASI ADLI YARDIM İSTEĞİ (YETKİ VERME YAZISI) " .

Sybil Cayir

X 

February 8, 2019

Turkish Translator

Judicial Council of California ID#700599

## Çevirmenin Deklarasyonu

Ben, Sybil Cayir, Türk dilini ve İngilizceyi anladığımı bu yeminli ifade ile beyan etmekteyim; aynı zamanda Amerikan Çevirmenler Derneği üyesi olduğumu ve Kimlik no 700599 ile Kaliforniya Adli Konseyi'nde tercüman olarak kayıtlı olduğumu, ayrıca ABD Dış İşleri Bakanlığının sözleşmeli tercümanı olduğumu ve Federal Mahkemeler sisteminde her türlü dökümanı tercüme etmeye yetkili olduğumu, aynı zamanda ABD Savunma Bakanlığının Türkçe dili yetkilisi olduğumu beyan eder 5 Şubat, 2019 tarihli ve "REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE (LETTER ROGATORY)" başlıklı dökümanın Türkçe olarak "ULUSLARARASI ADLİ YARDIM İSTEĞİ (YETKİ VERME YAZISI)" olarak tercümesinin bilgi ve inancıma göre aynı anlam ifade ettiğini beyan ve yemin ederim.

Sybil Cayir

X. 

8 Şubat, 2019

Türkçe Tercüman

Kaliforniya Adli Konseyi Kimlik No#700599

## CALIFORNIA CERTIFICATE OF ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California )

County of SAN BERNARDINO )

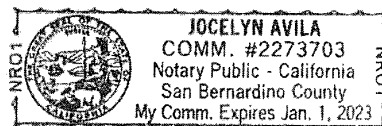
On FEBRUARY 8, 2019 before me, JOCELYN AVILA, NOTARY PUBLIC  
(here insert name and title of the officer)

personally appeared SYBIL CAYIR

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature

*Jocelyn Avila*

(Seal)

### Optional Information

Although the information in this section is not required by law, it could prevent fraudulent removal and reattachment of this acknowledgment to an unauthorized document and may prove useful to persons relying on the attached document.

#### Description of Attached Document

The preceding Certificate of Acknowledgment is attached to a document titled/for the purpose of \_\_\_\_\_

containing \_\_\_\_\_ pages, and dated \_\_\_\_\_

The signer(s) capacity or authority is/are as:

- Individual(s)
- Attorney-in-Fact
- Corporate Officer(s) \_\_\_\_\_  
Title(s)

- Guardian/Conservator
- Partner - Limited/General
- Trustee(s)
- Other: \_\_\_\_\_

representing: \_\_\_\_\_  
Name(s) of Person(s) or Entity(ies) Signer is Representing

Additional Information	
<b>Method of Signer Identification</b>	
Proved to me on the basis of satisfactory evidence: <input type="radio"/> form(s) of identification <input type="radio"/> credible witness(es)	
Notarial event is detailed in notary journal on: Page # _____    Entry # _____	
Notary contact: _____	
<b>Other</b>	
<input type="checkbox"/> Additional Signer(s)	<input type="checkbox"/> Signer(s) Thumbprint(s)
<input type="checkbox"/>	



**OFFICE OF THE FEDERAL DEFENDER  
EASTERN DISTRICT OF CALIFORNIA  
HEATHER E. WILLIAMS, FEDERAL DEFENDER**



801 I Street, 3rd Floor, Sacramento, California 95814  
Phone: (916) 498-5700 Fax: (916) 498-5710

**CONSENT TO RELEASE INFORMATION**

RE: OMAR ABDULSATTAR AMEEN      DOB: DECEMBER 20, 1973      OTHER: \_\_\_\_\_

I hereby authorize and request \_\_\_\_\_ to disclose and give copies to the Office of the Federal Defender (or its representatives, including investigators Christopher Chang and Linda Humble, and Paralegal Julie Denny), for use in my legal proceedings, any and all records and/or information concerning the undersigned which you may have in your possession, including but not limited to the following:

1. Personal information, including financial or commercial records, tenancy/housing records, temporary housing records, contracts, and/or business records.
2. Social welfare records.
3. Education records including counseling, attendance, discipline, progress reports, exam registration and results documents, and exam certificates.
4. Medical records including (but not limited to) reports, files, charts, memoranda, correspondence, patient histories, admission, physical and discharge reports, emergency room records, physician and other health care provider's notes, psychotherapy notes, progress reports, outpatient records, medication records, test data and results, laboratory, radiology and other diagnostic test reports, referrals, consultation notes and reports, billing records, insurance records, records sent to you by other health care providers, and all other documents.
5. Program participation, i.e., quarterly reviews, staffing reports, special incident reports, discharge summary, all records maintained by any correctional institution, including prison central files.
6. Law enforcement records, rap sheets, police reports, warrants, and/or investigation reports regarding any civil or criminal action involving the undersigned.
7. Court records including court, probation and juvenile justice records.
8. Legal files, including but not limited to trial preparation materials, discovery, investigative notes and reports, correspondence, attorney notes, and attorney work product.
9. Records maintained by any correctional institution, including prison central files.
10. Records maintained by any immigration or refugee agency, including but not limited to the United States Immigration and Naturalization Service, or the UNHCR.
11. Records maintained by foreign governments and any sub-unit thereof.
12. Cell phone records, including usage records, the content of texts and emails, and location data including cell-site information.
13. Social media information, including subscriber information, passwords, and the content of postings.
14. Travel records including travel documents, point of entry records, airport searches, port searches, border and checkpoint searches, vehicle rental agreements and commuter transport records.
15. Financial records including bank account information, credit and credit agreements, ATM and payment card usage, payment gateway services including but not limited to PayPal, Venmo, Google Wallet.

I further understand I have a right to receive a copy of this authorization upon my request. This authorization shall become effective immediately and remain in effect for a period of three years unless a date of termination of authorization is given here: \_\_\_\_\_ (Date)

I further authorize and consent to use of a copy of this release to obtain the above records and to disclosure and copying of any of the above records. A photocopy of this release is as effective as the original.

In consideration of such disclosure on the part of the above-named person and/or institution, I hereby release them from any and all liability arising therefrom.

DATED: 12/7/18

\_\_\_\_\_  
DEFENDANT

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

CIVIL CODE § 1189

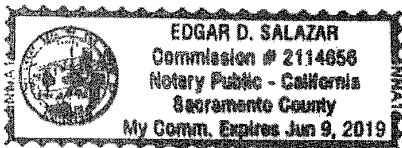
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California )
County of Sacramento )
On 12/17/2018 before me, Edgar D. Salazar, Notary Public
Date Here Insert Name and Title of the Officer
personally appeared Omar Abdul Gaffar Amreen
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature Edgar D. Salazar
Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document Consent to
Title or Type of Document: Release of Information Document Date: 12/17/2018
Number of Pages: 1 Signer(s) Other Than Named Above:

Capacity(ies) Claimed by Signer(s)
Signer's Name: Omar Abdul Gaffar Amreen Signer's Name:
Corporate Officer - Title(s):
Partner - Limited General
Individual Attorney in Fact
Trustee Guardian or Conservator
Other:
Signer Is Representing:

Ministry of Justice of the Republic of Turkey  
Directorate General for Foreign Relations and European Union  
Bureau of Criminal Rogatory and Service of Documents

Our ref: 14838002-4-2-USA-16-2019-E.19198/55229

17 May 2019

Subject: Omar Abdulsattar Ameen

Department of Justice of the United States  
Office of International Affairs  
Criminal Department  
1301 New York Avenue N.W. 8th Floor  
Washington D.C. 20530  
U.S.A.

Re: California District Court's letter dated 5 February 2019 and numbered 18-MJ-00152-EFB and received in the attachment of the e-mail dated 22 February 2019

Regarding the judicial assistance document received in the attachment of your related correspondence, certain information and documents about Omar Abdulsattar Ameen have been demanded in order to be used in the process of extradition as part of the investigation conducted on him with the charges of "fraud and misuse of visas, permits and other documents" and "fraudulent representation".

The demand asserted via the concerning letter has been understood to be within the scope of international judicial assistance demands. And the co-operation in criminal matters between our country and the U.S.A. is conducted in accordance with the "Treaty on Extradition and Mutual Assistance in Criminal Matters between the United States of America and The Republic of Turkey". And as per article 38 of this Treaty, the judicial assistance demands can only be asserted through the competent authorities. Therefore in the case that the concerning document is sent to the Ministry of Justice of the Republic of Turkey through the agency of the Department of Justice of the United States the request will be able to be honored.

Respectfully submitted for your information. Best regards,

[signature]

Mr. Gokhan Erdogan  
Judge  
Department Head

Address: Milli Müdafaa Caddesi No:22 Bakanlıklar / Ankara

Telephone no for detailed information: +903124148836

Fax: +903122194523 e-mail: [uhdigm@adalet.gov.tr](mailto:uhdigm@adalet.gov.tr) Web-site: [www.adalet.gov.tr](http://www.adalet.gov.tr)

UYAP (National Judiciary Informatics System) address and ref no for access to this document  
<http://vatandas.uyap.gov.tr> Fy2LyEC - iaLRx7j - Y9LbAA Y - 998YSU

EXHIBIT B



U.S Department of Justice

## Certification of Identity

FORM APPROVED OMB NO.  
1103-0016 EXPIRES 05/31/2020

**Privacy Act Statement.** In accordance with 28 CFR Section 16.41(d) personal data sufficient to identify the individuals submitting requests by mail under the Privacy Act of 1974, 5 U.S.C. Section 552a, is required. The purpose of this solicitation is to ensure that the records of individuals who are the subject of U.S. Department of Justice systems of records are not wrongfully disclosed by the Department. Requests will not be processed if this information is not furnished. False information on this form may subject the requester to criminal penalties under 18 U.S.C. Section 1001 and/or 5 U.S.C. Section 552a(i)(3).

Public reporting burden for this collection of information is estimated to average 0.50 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Suggestions for reducing this burden may be submitted to the Office of Information and Regulatory Affairs, Office of Management and Budget, Public Use Reports Project (1103-0016), Washington, DC 20503.

Full Name of Requester <sup>1</sup> Omar Abdulsattar AmeenCitizenship Status <sup>2</sup> refugee Social Security Number <sup>3</sup> Current Address Sacramento County Main Jail, 651 I St.Date of Birth 12/20/1973 Place of Birth Sacramento, CA 95814  
Rawa, Iraq.**OPTIONAL: Authorization to Release Information to Another Person**

This form is also to be completed by a requester who is authorizing information relating to himself or herself to be released to another person.

Further, pursuant to 5 U.S.C. Section 552a(b), I authorize the U.S. Department of Justice to release any and all information relating to me to:

Rachelle Barbour, Office of the Federal Defender**Print or Type Name**

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that I am the person named above, and I understand that any falsification of this statement is punishable under the provisions of 18 U.S.C. Section 1001 by a fine of not more than \$10,000 or by imprisonment of not more than five years or both, and that requesting or obtaining any record(s) under false pretenses is punishable under the provisions of 5 U.S.C. 552a(i)(3) by a fine of not more than \$5,000.

Signature <sup>4</sup>  Date 9/9/19

<sup>1</sup> Name of individual who is the subject of the record(s) sought.

<sup>2</sup> Individual submitting a request under the Privacy Act of 1974 must be either "a citizen of the United States or an alien lawfully admitted for permanent residence," pursuant to 5 U.S.C. Section 552a(a)(2). Requests will be processed as Freedom of Information Act requests pursuant to 5 U.S.C. Section 552, rather than Privacy Act requests, for individuals who are not United States citizens or aliens lawfully admitted for permanent residence.

<sup>3</sup> Providing your social security number is voluntary. You are asked to provide your social security number only to facilitate the identification of records relating to you. Without your social security number, the Department may be unable to locate any or all records pertaining to you.

<sup>4</sup> Signature of individual who is the subject of the record sought.





**U.S. Department of Justice**

Criminal Division

Office of Enforcement Operations

Washington, D.C. 20530

**VIA Electronic Mail**

February 11, 2020

Ms. Rachelle Barbour  
Assistant Federal Defender  
Federal Defender's Office  
801 I Street, 3rd Floor  
Sacramento, CA 95814  
[Rachelle\\_Barbour@fd.org](mailto:Rachelle_Barbour@fd.org)

Request No. CRM-300836232  
Subject: Criminal Division Documents –  
Republic of Turkey (Omar Ameen)

Dear Ms. Barbour:

This acknowledges receipt of your Freedom of Information Act request dated January 26, 2020 seeking records maintained by the Criminal Division. Your request was received in this Office on January 27, 2020. The request number listed above has been assigned to your request. Please use this number in all correspondence concerning your request.

- Your request has been received by the Freedom of Information Act/Privacy Act Unit and we are searching the section(s) most likely to maintain responsive records.
- Because your request presents "unusual circumstances" (See 5 U.S.C. § 552(a)(6)(B)(i)-(iii)), we are extending the time limit to respond to your request an additional ten days as provided by the statute.
- We have not yet made a decision on your request for a fee waiver. We will do so after we determine whether the processing of your request will result in any assessable fees.
- We have not yet made a decision on your request for preferred fee status. We will do so after we determine whether the processing of your request will result in any assessable fees.
- Your request for expedited treatment has been:
  - Granted. Accordingly, your request has been assigned to a Government Information Specialist in this Office and we will respond to your request as soon as practicable.
  - Denied. You have not established that your request fits within any of the four U.S.

Department of Justice standards for expedited treatment. If you are not satisfied with the Criminal Division's determination in response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, 441 G Street, NW, 6th Floor, Washington, D.C. 20530, or you may submit an appeal through OIP's FOIA STAR portal by creating an account on the following website: <https://foiastar.doj.gov>. Your appeal must be postmarked or electronically transmitted within 90 days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal."

I regret the necessity of this delay, but I assure you that your request will be processed as soon as possible. If you have any questions or wish to discuss reformulation or an alternative time frame for the processing of your request, you may contact me by telephone at (202) 616-0307, by email at [crm.foia@usdoj.gov](mailto:crm.foia@usdoj.gov), or by mail at the Criminal Division, U.S. Department of Justice, Suite 1127, Keeney Building, NW, Washington, DC 20530-0001.

You may contact our FOIA Public Liaison at the telephone number listed above for any further assistance and to discuss any aspect of your request. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, Room 2510, 8601 Adelphi Road, College Park, Maryland 20740-6001; e-mail at [ogis@nara.gov](mailto:ogis@nara.gov); telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

Sincerely,

A handwritten signature in cursive script that reads "Amanda Marchand Jones". The signature is written in black ink and is positioned above the typed name.

Amanda Marchand Jones  
Chief  
FOIA/PA Unit



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**FOIA CRM-300836232 - Request for estimated date of completion**

1 message

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**Rachelle Barbour** <Rachelle\_Barbour@fd.org>  
To: "CRM FOIA (CRM)" <CRM.FOIA@usdoj.gov>

Thu, May 6, 2021 at 10:55 AM

Good morning,

Pursuant to 5 U.S.C. § 552(a)(7)(B)(ii), I request an estimated date of completion for FOIA CRM-300836232.

Thank you for your anticipated attention to this request,

Rachelle

Rachelle Barbour  
Assistant Federal Defender  
Office of the Federal Defender  
Eastern District of California  
801 I St., 3<sup>rd</sup> Floor  
Sacramento, CA 95814  
916-498-5700  
[Rachelle\\_Barbour@fd.org](mailto:Rachelle_Barbour@fd.org)

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**Re: FOIA/PA Status Update CRM-300836232 and CRM -300796232**

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Rachelle Barbour <Rachelle\_Barbour@fd.org>  
To: "CRM FOIA (CRM)" <CRM.FOIA@usdoj.gov>

Fri, May 14, 2021 at 2:02 PM

Pursuant to 5 U.S.C. § 552(a)(7)(B)(ii) please provide me with estimated dates of completion for these two FOIA requests to DOJ CRM.

Thank you,

Rachelle

Rachelle Barbour  
Assistant Federal Defender  
Office of the Federal Defender  
Eastern District of California  
801 I St., 3<sup>rd</sup> Floor  
Sacramento, CA 95814  
916-498-5700  
[Rachelle\\_Barbour@fd.org](mailto:Rachelle_Barbour@fd.org)

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