

# Exhibit A



U.S. Department of Justice

United States Attorney  
Western District of Washington

Please reply to:  
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February 19, 2008

*Via Messenger*

Mr. Alfred A. Day  
Stoel Rives LLP  
600 University Street, Suite 3600  
Seattle, WA 98101

Re: *Roshandel, et al. v. Chertoff, et al.*  
No. 07-1737-MJP, USDC, W.D. Washington

Dear Al:

This letter responds to your letter of January 31, 2008. We apologize for the delay in responding, which was prolonged by Nancy's recent two week absence from the office on business-related travel.

First, we disagree with your assertion that the FBI is required to make initial disclosures in this matter, as the only claims properly asserted against the FBI were brought under the APA. That said, we believe the issue is moot due to the FBI's production of its administrative record, which is included herewith. Any documents the FBI would rely on in this case, at least with respect to the claims of the individual plaintiffs (not class-wide claims) are included in the administrative record or with the documents that have already been produced or filed with the Court.

Second, please note that the USCIS A-files produced with our initial disclosures were not incomplete, just somewhat outdated. The A-files were complete as of the date on each of their certification pages, which was prior to the completion of the FBI name checks. We have subsequently obtained additional documents from USCIS that were added to the A-files after the original certification date. These documents will be produced herewith, although certain pages and information has been removed and/or redacted for the following reasons:

Mr. Alfred A. Day, Esq.  
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Attorney/Client Privileged Emails Between Counsel and USCIS (removed):

Gazi Moghaddam Updated A-File: Pages R60-63  
Ahmed Updated A-File: Pages R45-48  
Huang Updated A-File: Pages R112-115  
Roshandel Updated A-File: Pages R54-57, R41-44

Information Protected by the Law Enforcement Privilege (redacted or removed):

Gazi Moghaddam Updated A-File: Pages L 66, R67-69 (redacted); R53-59 (removed)  
Ahmed Updated A-File: Pages R52-54, L54 (redacted)  
Huang Updated A-File: Pages L57, R119-121 (redacted)  
Roshandel Updated A-File: Pages L300, R52, R48-49, R40 (redacted)

Finally, we have enclosed herewith Defendants' Objections and Responses to Plaintiffs' First Discovery Requests. Please do not hesitate to contact us if you wish to discuss any of these issues further.

Yours truly,

U.S. Department of Justice

A handwritten signature in black ink, appearing to read "Rebecca S. Cohen".

Nancy Safavi  
Rebecca S. Cohen