

IN THE UNITED STATES DISTRICT COURT
 FOR THE EASTERN DISTRICT OF VIRGINIA
 Alexandria Division

UNITED STATES OF AMERICA,)	
)	Criminal No. 03-513-A
vs.)	
)	
ABDURAHMAN M. ALAMOUDI,)	
)	
Defendant.)	
)	

DEFENDANT'S OBJECTIONS TO GOVERNMENT'S MOTION
 TO UNSEAL ANNEX TO STATEMENT OF FACTS

COMES NOW the Defendant, Abdurahman M. Alamoudi ("Alamoudi"), pro se, to object to the Government's motion to unseal the Annex to the Statement of Facts related to the plea agreement in the captioned matter. Alamoudi objects to unsealing the annex because to do so would unnecessarily expose him and members of his family to risks posed by those named in the annex and others associated with them without significantly advancing any interests in keeping the annex sealed. Alamoudi asks the Court to consider the following factors when it weighs the Government's motion against these objections:

Several of the persons identified in the annex were involved in events which have lead to the overthrow and attempted overthrow of particular Middle Eastern regimes through force and violence. The entire region remains unstable. Those identified in the annex and their associates can reasonably be expected to consider violent reactions to any actual or perceived actions or inactions on Alamoudi's part that may be even indirectly related to the events described in the annex and later


events. These reactions may be motivated by a political agenda, personal/group revenge, or both.

Unsealing the annex will not only put Alamoudi at risk unnecessarily, his family will also be put at risk unnecessarily. Given the broader view of family relationships in Middle Eastern society, those at potential risk includes a wider range of consanguinity than would be expected in Western societies. In addition to those living in the United States, Alamoudi has family members living in the United Kingdom, Saudi Arabia, the United Arab Emirates, Yemen, Egypt and Eritrea. Extremists and violent groups may well use the information in the sealed annex to harm Alamoudi and his family for actions that they view as treasonous against particular nations, movements, religion or ethnicity.

CONCLUSION

For these reasons, the Government's motion to unseal the Annex to the Statement of Facts should be denied.

Respectfully submitted,


Abdurahman M. Alamoudi, Pro Se
47042-083 JA
FCI-Ashland
Post Office Box 6001
Ashland, Kentucky 41105-6001

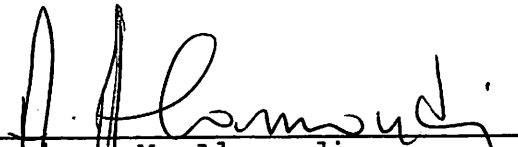
Date: May 7, 2015.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing "Defendant's Objections to Government's Motion to Unseal Annex to Statement of Facts" was deposited in the prison mail system at the Federal Correctional Institution, Ashland, Kentucky, in the manner prescribed for legal mail, including prepayment of first-class postage, addressed to:

United States Attorney's Office
2100 Jamieson Avenue
Alexandria, Virginia 22314-5794

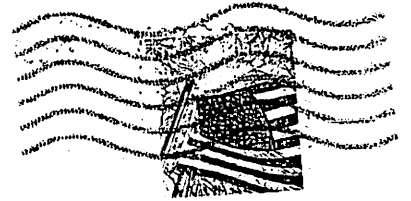
on the 7th day of May, 2015.


Abdurahman M. Alamoudi
47402-083 JA
FCI-Ashland
Post Office Box 6001
Ashland, Kentucky 41105-6001

ABDRAHMAN ALAMOUDI 47042-083 JA
FEDERAL CORRECTIONAL INSTITUTION
POST OFFICE BOX 6001
ASHLAND, KENTUCKY 41105

CHARLESTON WV 253

12 MAY 2015 PM 1 11



↔47042-083↔

The Clerk
United States Courthouse
401 Courthouse SQ
Alexandria, VA 22314-5704
United States

22314570499

