

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Crim. No.13-10200-GAO
	)	
DZHOKHAR A. TSARNAEV,	)	
Defendant	)	

POST-MOTION NOTICE TO THE COURT REGARDING MODIFICATION OF  
SPECIAL ADMINISTRATIVE MEASURES ("SAMS")

The United States of America, by and through its undersigned counsel, hereby provides notice to the Court regarding modifications to the SAMS which have been implemented subsequent to the motion hearing on November 12, 2013.

The first modification under Section 2.d. (**Attorney-Client Provisions - Attorney May Disseminate Inmate Conversations**) adds named individuals who are permitted to disseminate the contents of the defendant's communication to third parties for the sole purpose of preparing the defense. The named individuals include two investigators and a paralegal who are employed by the Federal Defender's Office; a mental health consultant; and a mitigation specialist. In a letter to the government, the defense indicated that all of the individuals are directly supervised by, and are accountable to, counsel of record.

The second modification is under Section 2.e. (**Attorneys, Precleared Paralegal(s), and Investigator(s) May Meet With**

**Client**). In addition to the attorneys and two previously pre-cleared investigators, the modification now permits the identified mental health consultant and the mitigation specialist to meet with the defendant without an accompanying attorney.

Finally, Section 2.f. (**Simultaneous Multiple Legal Visitors**) has now been modified to permit multiple legal visitors which include the counsel of record, pre-cleared paralegals, the investigators, the mitigation specialist, and the mental health consultant.

Respectfully submitted,  
CARMEN M. ORTIZ  
United States Attorney

By: /s/Nadine Pellegrini  
NADINE PELLEGRINI  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants

/s/Nadine Pellegrini  
NADINE PELLEGRINI  
Assistant U.S. Attorney

Date: December 3, 2013