

Declaration of A. Nicole Hallett

I declare pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct:

1. I write this declaration in support of Petitioner's Response to Respondent's Motion to Enforce the Protective Order. I am the attorney of record in this case.
2. After learning that Mr. Hassoun made an unauthorized disclosure pursuant to the protective order, we explained to our client again that he cannot reveal any information he learns from the documents to any person not covered by the protective order. Other than counseling our client, we have not taken any steps to mitigate the unauthorized disclosure.
3. The unauthorized disclosure occurred in a public gathering within the facility and Petitioner does not have a list of everyone present. It is not practicable to ask every person present to sign the protective order or to ask them to keep the information confidential. The government appears to be in a position to determine with precision who attended the sermon because, according to the Declaration of Brian Aguello submitted by the government in support of its motion, the detention facility requires everyone who wishes to attend prayer services to sign up weekly with their Unit Officer.
4. Further steps to mitigate the unauthorized disclosure are not likely to be effective because the information in question is no longer confidential. The key information that Petitioner disclosed—*i.e.* Mr. Ramsundar's involvement in this case as an informant for the government—was subject to the protective order at the time the disclosure occurred. But, since that time, the government has withdrawn its assertion of the confidential informant privilege over Mr. Ramsundar, and, importantly, the fact that he is one of the informants for the government was mentioned in Petitioner's Motion to Compel. *See* ECF No. 101,

at 4. Mr. Ramsundar's name and status as an informant was not redacted from the filings on the public docket. *See id.* The information in question is thus no longer confidential or subject to the Protective Order. To our knowledge, the government's waiver of the confidential informant privilege with respect to Shane Ramsundar was unrelated to this unauthorized disclosure.

5. Petitioner's counsel takes our obligations under the protective order very seriously and will do everything in our power to minimize the risk of future violations through careful counseling of our client on an ongoing basis.

Dated: March 18, 2020
Chicago, IL

/s/ A. Nicole Hallett

A. Nicole Hallett

Counsel for Petitioner