

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	
)	
DANUEL DEAN QUAINANCE, et al.,)	CR. NO. 06-538
)	
Defendants.)	

**NOTICE OF INTENT TO CALL EXPERT
WITNESS TO TESTIFY AT MOTION HEARING**

THE UNITED STATES OF AMERICA, by and through its attorney of record, David C. Iglesias, United States Attorney for the District of New Mexico, and Luis A. Martinez, Assistant United States Attorney for said District, hereby notifies the Court and all parties that the government intends to call Dr. Jehan Bagli to testify at the hearing on Defendant's motion to dismiss indictment, presently scheduled for Monday, August 21, 2006 in Albuquerque. Ervad Dr. Bagli, an ordained Zoroastrian Priest, will testify concerning current Zoroastrian religious practices. Ervad Dr. Bagli, a medicinal chemist, will also testify concerning the use of plants/drugs which are or may be psychedelic or hallucinogenic in nature. Additionally, Ervad Dr. Bagli will testify regarding the use of and meaning of substances in Pre-Zarathushtrian Prot-Indo-Iranian culture and their relationship to the Zarathushtrian Faith. A copy of Dr. Bagli's CV has been attached as Exhibit "A".

Respectfully submitted,
DAVID C. IGLESIAS
United States Attorney
Electronically filed 7/28/06
LUIS A. MARTINEZ
Assistant United States Attorney
555 S. Telshor, Suite 300
Las Cruces, New Mexico 88011
(505) 522-2304

I HEREBY CERTIFY that a true copy
of the foregoing notice was mailed
to counsel for Defendants, on this 28th
day of July, 2006.

/s/ Luis A. Martinez
LUIS A. MARTINEZ
Assistant U.S. Attorney