

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-20326-KMM

UNITED STATES OF AMERICA

vs.

ANDRE LORQUET,

Defendant.

**GOVERNMENT'S SECOND RESPONSE TO
THE STANDING DISCOVERY ORDER**

The United States hereby files this second response to the Standing Discovery Order. This response refers to three productions:

First, a production was provided by USAfx in the file titled 2022.12.16 production. A list of all files produced by USAfx are attached to this filing as Appendix A.

Second, a discovery production was provided in a hard drive by Fed Ex, tracking number 770837093491. A list of all files produced by thumb drive are attached to this filing as Appendix B.

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, Brady, Giglio, Napue, and the obligation to assure a fair trial.

The attachments to this response are listed in the attached appendix. Please contact the undersigned Assistant United States Attorney if any portions are missing.

Respectfully submitted,

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APPENDIX A

- CN_052.PayPal\PayPal BFS - Case01147959.xlsx
- CN_052.PayPal\Case01147959.zip
- CN_052.PayPal\Brandon Howard LLC\View Activity History.pdf
- CN_052.PayPal\Brandon Howard LLC\X0002515854\Case_01503324.pdf
- CN_052.PayPal\Brandon Howard LLC\X0002515854\Original Lead Information.pdf
- CN_052.PayPal\Brandon Howard LLC\X0002515854\Documents.pdf
- CN_052.PayPal\Brandon Howard LLC\X0002515854\Case_01181471.pdf
- CN_052.PayPal\Brandon Howard LLC\X0002515854\PaycheckProtectionPlan_PPP-0611710.pdf
- CN_052.PayPal\Brandon Howard LLC\X0002515854\A00511278\Loan Forgiveness Application.pdf
- CN_052.PayPal\Brandon Howard LLC\X0002515854\A00511278\Transactions_A00511278.pdf
- CN_052.PayPal\Brandon Howard LLC\X0002515854\A00511278\LoanForgiveness_LF-00097997.pdf
- CN_052.PayPal\Brandon Howard LLC\X0002515854\A00511278\Case_01518641.pdf
- CN_052.PayPal\Brandon Howard LLC\X0002515854\A00511278\Advance History for _A00511278.pdf
- CN_028.Cross River\AJI Clark Bathtub Refinishing SBA Loan # 5311208002.PNG
- CN_028.Cross River\Guide.PNG
- CN_028.Cross River\Subpoena 2021R00182 cert.pdf
- CN_028.Cross River\Daniela Rendon SBA Loan # 7055558001.PNG
- CN_028.Cross River\CN_028_All Docus_Cross River Bank.pdf
- CN_028.Cross River\Loan(s) through Bluevine\DANIELA RENDON, P.A\Communications 2.pdf
- CN_028.Cross River\Loan(s) through Bluevine\DANIELA RENDON, P.A\BLV_Privacy_Notice_07012020_0350539.pdf
- CN_028.Cross River\Loan(s) through Bluevine\DANIELA RENDON, P.A\Bank Account.pdf
- CN_028.Cross River\Loan(s) through Bluevine\DANIELA RENDON, P.A\eStmnt_2020-02-28 (32).pdf
- CN_028.Cross River\Loan(s) through Bluevine\DANIELA RENDON, P.A\Application Info.pdf
- CN_028.Cross River\Loan(s) through Bluevine\DANIELA RENDON, P.A\Daniela Rendon PA (1).pdf
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APPENDIX B

- Letter 27146730.pdf
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