

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-CR-80103-CANNON

UNITED STATES OF AMERICA

v.

DUSTIN SEAN McCABE,

Defendant.

GOVERNMENT'S FOURTH RESPONSE TO STANDING DISCOVERY ORDER

The United States hereby files this fourth response to the Standing Discovery Order (“SDO”), incorporating by reference its previous SDO responses. *See* DE 19; DE 25; DE 36. Since filing the Third SDO Response, the Government produced the following records via email on January 25, 2025: (1) messages between J.H. and J.M., marked as Bates MCCABE_ 003253 through 003263, and (2) messages between D.A. and the Defendant, marked as Bates MCCABE_003264 through 003283. Counsel for the defense should alert the undersigned Assistant United States Attorney if it has any problems accessing these records.

The government remains 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.

Respectfully submitted,

MICHAEL S. DAVIS
ACTING UNITED STATES ATTORNEY

Date: January 25, 2025

By: /s/ Zachary A. Keller
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 25, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that referenced discovery was served on counsel of record as described herein.

/s/ Zachary A. Keller
ZACHARY A. KELLER
Assistant United States Attorney