

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

**CASE NO. 24 -80103-CR-CANNON**

**UNITED STATES OF AMERICA**

**v.**

**DUSTIN SEAN McCABE,**

**Defendant.**

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**GOVERNMENT'S SIXTH RESPONSE TO STANDING DISCOVERY ORDER**

The United States hereby files this sixth response to the Standing Discovery Order (“SDO”), incorporating by reference its previous SDO responses. *See* DE 19; DE 25; DE 36; DE 45; DE 51. Since filing the Fifth SDO Response, the Government produced the following records via email and USAfx:

- On February 17, 2025, (1) a photograph of C.M.’s dive logbook marked as Bates MCCABE\_003303, (2) screenshots of C.M.’s text messages with J.H. marked as Bates MCCABE\_003304-003306,(3) reports from a witness preparation interview of C.H. marked as Bates MCCABE\_03307, (4) records from GEICO marked as Bates MCCABE\_003308-003642.
- On February 18, 2025, supplemental reports marked as Bates MCCABE\_003643-003646.

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,

HAYDEN P. O'BYRNE  
UNITED STATES ATTORNEY

Date: February 18, 2025

By: /s/ Zachary A. Keller

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 18, 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