

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

CASE NO. 22-20290-CR-BLOOM/OTAZO-REYES

UNITED STATES OF AMERICA,

v.

ERIC DEAN SHEPPARD,

Defendant.

/

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

The United States hereby files this fourth response to the Standing Discovery Order. This response also complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16.

A. 5. The following documents are being produced:

Florida Department of Revenue records;
Bank of America records;
Additional Paypal/Webbank records;
Interview reports;
SBA records;
Copy of death certificate.

B. DEMAND FOR RECIPROCAL DISCOVERY: Pursuant to the Standing Discovery Order, the United States requests the disclosure and production of materials listed in Section (b) of Local Rule 88.10. This request is also made pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure.

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 government is producing a thumb drive containing the above-referenced documents bates numbered as SHEPP_011525 – SHEPP_031284.

Previously, by letter dated August 2, 2022, the government advised counsel for the defendant that it had other documents unrelated to the charged conduct that it was making available

for inspection. On April 25, 2023, the government produced to defense counsel a copy of the following records that it had made available for inspection: records from AmeriAsia Bank, Bank United, Bank of America, City National Bank, Intercredit Bank, Key Bank, Suntrust Bank, and Wells Fargo; IRS records; Florida Division of Corporations records; and deposition transcripts.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 9, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF (without attachments), which will send Notices of Electronic Filing to all counsel of record.

s/Aimee Jimenez
Aimee C. Jimenez
Assistant United States Attorney