

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 FIFTH RESPONSE TO
THE STANDING DISCOVERY ORDER**

The United States hereby files this fifth 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:

Interview reports

Copies of deeds for HM-UP Development Alafaya Trails, LLC

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 reiterates its request for reciprocal discovery of materials the defense intends to introduce at trial in its case in chief.

N. The government is disclosing the following information regarding the testimony of an expert witness:

The United States expects to rely on the testimony of a witness from the Internal Revenue Service with expertise in employer tax withholdings of employee wages and the difference between W-2 employees and Form 1099 independent contractors. The government will produce the curriculum vitae of the witness as soon as it is available.

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 the above-referenced documents bates numbered as SHEPP_031285 – SHEPP_031324, electronically via the USAFX portal.

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By: s/Aimee Jimenez
Aimee C. Jimenez
Assistant United States Attorney
Court No. A5500795
99 Northeast 4th Street
Miami, Florida 33132-2111
Tel: (305) 961-9028
Email: aimee.jimenez@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 6, 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