



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 22, 2021

BY ECF AND EMAIL

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Apocalypse Bella, 21 Cr. 247 (PAE)

Dear Judge Engelmayer:

The Government writes in response to the Court's inquiry at the pretrial conference on September 8, 2021 regarding the possibility that defense counsel would seek to review the full images of a device or devices belonging to a co-defendant.

The Government has spoken with counsel for each defendant. No defendant is making such a request at this time. If and when a defendant makes such a request, and if that request cannot be resolved without the Court's involvement, we expect that the requesting party will make an application to the Court.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By:

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cc: Charles Kaser, Esq. (counsel for Apocalypse Bella) (by email and ECF)
Tamara Giwa, Esq. (counsel for Amos Mundendi) (by email and ECF)
Bret Martin, Esq. (counsel for Mackenzy Toussaint) (by email and ECF)