

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

CASE NO. 22-20326-CR-MOORE

UNITED STATES OF AMERICA,

v.

ANDRE LORQUET,

Defendant.

_____ /

**UNITED STATES OF AMERICA’S NOTICE OF INTENT TO ADMIT EVIDENCE
PURSUANT TO FEDERAL RULES OF EVIDENCE 902(11) AND 803(6)**

The United States of America, by and through the undersigned Assistant United States Attorney, hereby files this notice of intent to admit evidence through Federal Rules of Evidence (“FRE”) 902(11) and 803(6), and states the following in support thereof:

At the trial of the instant cause, the United States intends to admit business records through Federal Rule of Evidence 902(11) and 803(6), which provide for the admissibility and authenticity of business records via certifications provided by a records custodian.

Pursuant to Federal Rule of Evidence 902(11),

A party intending to offer a record into evidence under this paragraph must provide written notice of that intention to all adverse parties, and must make the record and declaration available for inspection sufficiently in advance of their offer into evidence to provide an adverse party with a fair opportunity to challenge them.

Pursuant to Federal Rule of Evidence 803(6),

The following [is] not excluded by the rule against hearsay, regardless of whether the declarant is available as a witness: . . . A record of an act, event, condition, opinion, or diagnosis if: (A) the record was made at or near the time by—or from information transmitted by—someone with knowledge; (B) the record was kept in the course of a regularly conducted activity of a business, organization, occupation, or calling, whether or not for profit; (C) making the record was a regular practice of that activity; (D) all these conditions are shown by the testimony of the custodian or another qualified witness, or by a certification that complies with Rule 902(11) or (12) or with a statute permitting certification.

The certifications are attached to this notice. Below are the document control numbers corresponding with each certification:

CN_031 Elite Motors Cars

This filing is intended to provide the defense with the required notice under Federal Rule of Evidence 902(11). The above certifications and corresponding business records have been produced to the defense.

Respectfully submitted,

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

BY: Jonathan Bailyn
Jonathan R. Bailyn, AUSA
Court ID No. A5502602
99 Northeast Fourth Street, 6th Floor
Miami, Florida 33132-2111
Phone: (305) 961-9071
jonathan.bailyn@usdoj.gov