

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

**CASE NO. 21-CR-20231-DMM**

UNITED STATES OF AMERICA

vs.

CARLOS VAZQUEZ,

Defendant.

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

The United States hereby files this FIFTH response to the Standing Discovery Order. The attachment to this response is comprised of bates number USA\_1354-1355. The materials were served via email today. Please contact the undersigned Assistant United States Attorney if any portion of this discovery production appears to be missing.

Counsel for the defendant may inspect any item of tangible evidence reflected in the discovery, any item of evidence that was seized from your client, and any item that the United States intends to offer in its case-in-chief, with reasonable notice, at the Office of the United States Attorney, located at 99 Northeast 4th Street, Miami, Florida. PLEASE NOTE: Electronic Devices seized during the execution of the search warrant on March 23, 2021 have been examined and is available for your review. Please contact the undersigned Assistant United States Attorney if you wish to make arrangements to review same.

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.

In addition to the request made above by the government pursuant to the Standing Discovery Order and Rule 16(b) of the Federal Rules of Criminal Procedure, in accordance with Rule 12.1 of the Federal Rules of Criminal Procedure, the government hereby reiterates its demand for all reciprocal discovery it is

entitled to under Rules 16(b) and 26.2 of the Federal Rules of Criminal Procedure.

Respectfully submitted,

JUAN ANTONIO GONZALEZ  
ACTING UNITED STATES ATTORNEY

By: /s/ Hayden P. O'Byrne  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 2, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that I caused the foregoing document to be served this day on all counsel of record on the Service List below in the manner specified.

/s/ Hayden P. O'Byrne

Hayden P. O'Byrne

Assistant United States Attorney

**SERVICE LIST**

| Party          | Counsel                                                                                                                                                                                    | Manner of Service                                                          |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| Carlos Vazquez | Albert Z. Levine<br>Albert Z. Levine, P.A.<br>40 N.W. 3 <sup>rd</sup> Street<br>Suite 200<br>Miami, FL 33128<br><a href="mailto:albert@albertlevinelaw.com">albert@albertlevinelaw.com</a> | CM/ECF <i>without</i><br>attachments.<br>Email <i>with</i><br>attachments. |