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Reply to: Fort Myers, FL

October 7, 2020

Nicole Hughes Waid
Fisher Broyles, LLP
2390 Tamiami Trail North, Suite 100
Naples, FL 34103

Re: *United States v. Casey David Crowther*
Case No. 2:20-cr-114-FtM-66MRM

Dear Ms. Waid:

In connection with the above-captioned cases and pursuant to Fed. R. Crim. P. 16(a) as well as the Court's Criminal Scheduling Orders, the government has uploaded discovery onto USAFX.

In connection with the above captioned cases, please be advised of the following:

1. With respect to the substance of any oral statement which the government intends to offer in evidence at trial made by the defendant before or after arrest in response to interrogation by any person then known to the defendant to be a government agent, please be advised that the defendant **did not** make such oral statements to government agents.
2. With respect to any relevant written or recorded statements made by the defendant, please be advised that the United States **is not** in possession of recorded statements made by the defendant.

3. The prior criminal record of the defendant has been made available as part of discovery.

4. As to Rule 16 documents and tangible objects, the government is providing the documents which will be used in their case-in-chief in their electronic discovery production. Please feel free to contact me or the case agent, **USSS Senior Special Agent Brian Kirby**, if you believe electronic production of such documents is insufficient.

5. There are not reports of examinations and tests in connection with this case at this time.

6. At this time, the government does not intend to call an expert witness.

7. Electronic surveillance has not been conducted with respect to this investigation.

8. At this time, the government does not intend to introduce evidence pursuant to Fed. R. Evid. 404(b) in its case-in-chief in this matter.

9. Confidential informants did not provide information during the course of the investigation.

10. There is no known conflict of interest in the representation of the defendant by attorneys in this case. Should such a conflict become known to the government, counsel for the defendant will be alerted

11. The defendant was not identified by means of photo identification.

12. Evidence was not seized as a result of search warrants.

13. We are aware of continuing discovery obligations pursuant to Fed. R. Crim. P. 16(c) and will make you aware of such materials as soon as possible if such materials come to our attention.

13. Pursuant to Fed. R. Crim. P. 16(b), the United States requests the following:

a. Books, papers, documents, photographs, tangible objects, or copies or portions thereof, which are within the possession, custody, or control of the defendant and which the defendant intends to introduce as evidence in chief at the trial. Fed. R. Crim. P. 16(b)(1)(A).

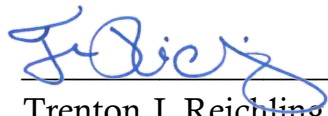
b. Any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with the particular case, or copies thereof, within the possession or control of the defendant, which the defendant intends to introduce as evidence in chief at the trial or which were prepared by a witness whom the defendant intends to call at the trial when the results or reports relate to that witness' testimony. Fed. R. Crim. P. 16(b)(1)(B).

c. A written summary of testimony that the defendant intends to use under Rule 702, 703, or 705 of the Federal Rules of Evidence as evidence at trial, describing the witnesses' opinions, the bases and reasons for those opinions and the witnesses' qualifications. Fed. R. Crim. P. 16 (b)(1)(C).

If you have any questions concerning any of the foregoing, please do not hesitate to contact the undersigned.

Sincerely,

MARIA CHAPA LOPEZ
United States Attorney

By: 
Trenton J. Reichling
Assistant United States Attorney