

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

CASE NO: 23-CR-20036-KMM

UNITED STATES,

v.

DANIEL RENDON,

Defendant.

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**UNITED STATES' RESPONSE TO THE DEFENDANT'S
PRO SE MOTION TO RETURN PROPERTY**

The United States does not oppose the Defendant Daniela Rendon's *pro se* Motion for Return of Property (the "Motion") [ECF No. 85]. However, the "specific aircraft documents" which the Defendant refers to in the Motion are not the property of the Defendant or her mother. The aircraft documents are the property of Eliasib Reyes, the Defendant's fiancé, who surrendered his flight certificate and aircraft registration as a condition of the Defendant's bond [ECF No. 11]. After co-signing the Defendant's bond, however, Mr. Reyes was indicted, pled guilty, and was sentenced to seven months' imprisonment on September 11, 2023, for wire fraud. *See United States v. Reyes*, Case No. 23-cr-20166-ALTONAGA (S.D. Fla. Sept. 11, 2023). The undersigned has conferred with Mr. Reyes' counsel in *United States v. Reyes*, Frank Gaviria, who is willing to take custody of Mr. Reyes' aircraft documents, as he has taken custody of Mr. Gaviria's passport, *see Reyes*, Case No. 23-CR-20166-ALTONAGA (S.D. Fla. Oct. 7, 2023) (granting motion to return Mr. Reyes' passport to the custody of Mr. Gaviria). The Government therefore does not object to Mr. Reyes' aircraft documents being returned to:

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Respectfully submitted,

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