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Reply to: Fort Myers, FL

SL/cc

December 20, 2021

James Lappan
Federal Public Defender's Office
2075 West First Street, Suite 300
Fort Myers, FL 33901

Re: *United States v. Edrica Leann Watson*
Case No. 2:21-cr-107-SPC-MRM

Dear Mr. Lappan:

In connection with the above-captioned case, and pursuant to Fed. R. Crim. P. 16(a) as well as the Court's Criminal Scheduling Order, the United States is providing you with discovery materials via USAfx. You will be required to sign a receipt for the materials provided, which has also been provided via USAfx.

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

- *Rule 16(a)(1)(A)*: Defendant's Oral Statement. There **have been** oral statements made by the defendant in response to interrogation that the Government intends to use in trial at this time.
- *Rule 16(a)(1)(B)*: Defendant's Written or Recorded Statement. Any written or recorded statement made by the defendant has been included as part of discovery in this case. *See, e.g., Interview provided as part of discovery disclosure.*

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- *Rule 16(a)(1)(C):* Organizational Defendant. The defendant **is not** an “organization defendant.”
- *Rule 16(a)(1)(D):* Defendant’s Prior Record. The defendant **does not** have any prior criminal convictions.
- *Rule 16(a)(1)(E):* Documents and Objects. As to Rule 16 documents and tangible objects, you are free to inspect such items which will be used by the government in its case-in-chief by contacting the case agent, **USSS Corey Graves** and scheduling an appointment for viewing and inspection at a mutually convenient time.
- *Rule 16(a)(1)(F):* At this time, there **are no** Report of Examinations and Tests.
- *Rule 16(a)(1)(G):* Expert Witnesses. At this time, the government **does not** intend to call an expert witness.
- Additional Disclosures and Discovery ¶ (1)(a—b): At this time, there **is no** electronic surveillance conducted by witnesses or law enforcement or mail covers that law enforcement officers and witnesses used in investigating this case, at this time, there **are no** transcripts from the electronic surveillance.
- Additional Disclosures and Discovery ¶ (1)(c): Evidence **has been** collected through search warrants that the United States intends to introduce during trial in this case.
- Additional Disclosures and Discovery ¶ (1)(d): **No** confidential informants were used during this investigation.
- Additional Disclosures and Discovery ¶ (1)(e—f): At this time, **no** witness has identified the defendant in a photo lineup which was been provided as part of discovery.
- Additional Disclosures and Discovery ¶ (1)(g): At this time, there **are no** latent fingerprints that a government expert has identified as belonging to Defendant for independent examination.

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- Additional Disclosures and Discovery ¶ (1)(h): At this time, the United States **does not** intend to introduce prior act evidence pursuant to Fed. R. Evid. 404(b) in this case.
- Additional Disclosures and Discovery ¶ (1)(i): There are no known conflicts of interest in this case at this time.

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.

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).

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

Sincerely,

By: /s/ Shannon Laurie
Shannon Laurie
Assistant United States Attorney