

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE No. 22-20290-CR-BLOOM/OTAZO-REYES

UNITED STATES OF AMERICA

Plaintiff,

v.

ERIC DEAN SHEPPARD,

Defendant.

**DEFENDANT'S AMENDED NOTICE
OF INTENT TO UTILIZE EXPERT TESTIMONY**

Defendant, Eric Dean Sheppard, hereby files this Amended Notice of Intent to Utilize Expert Witness Testimony. Pursuant to Rule 16(B) of the Federal Rules of Criminal Procedure, Defendant provides this amended notice that Defendant may call the following expert witness in his case at trial.

The qualifications of the expert witness, Scott Bouchner of Berkowitz Pollack Brant Advisors ("BPBA"), are described in his CV, which was provided to counsel for the government via email. Mr. Bouchner is a partner at BPBA and the director-in-charge of forensic accounting and business valuation services. His practice areas include bankruptcy, insolvency, litigation support, expert witness testimony, forensic accounting investigations, due diligence investigations, and more.

At this juncture, Mr. Bouchner is expected to testify: (1) about the cash flows of certain of Defendant's companies, including source of funding and use of funds; (2) that the proceeds from the loans at issue were applied to pay workers and other business expenses; (3) that Defendant's

accounts were funded with sufficient funds outside of the government loans to cover personal expenses; and (4) that money is fungible.

Mr. Bouchner's testimony will draw upon his expertise and experience. With respect to financial documents, to date Mr. Bouchner is relying on bank and credit card documents produced by the Government, QuickBooks records for Mr. Sheppard's companies produced by the Government, and other similar QuickBooks business records that Defendant will produce.

Dated: September 19, 2023.

Respectfully submitted,

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By: /s/ Jayne C. Weintraub
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 19, 2023, a copy of the foregoing was electronically filed using the Court's CM/ECF system and electronic notice was provided to the Office of the United States Attorney.

By: /s/ Jayne C. Weintraub
Jayne C. Weintraub