

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 ERIC DEAN SHEPPARD'S
AMENDED EXHIBIT LIST FOR TRIAL¹**

Defendant, Eric Dean Sheppard, respectfully submits this amended list of exhibits for trial.

Defendant reserves the right to add additional exhibits, including exhibits required after the Government's presentation in its case-in-chief.

The Honorable Judge Beth Bloom		<u>Counsel for the United States</u> Aimee Jimenez Ana Marie Martinez		<u>Counsel for Defendant</u> Jayne Weintraub Jonathan Etra Chris Cavallo	
Trial Date: 11/27/23		Court reporter: Yvette Hernandez		Courtroom deputy: Elizabeth Gariazzo	
USA No.	DEF No.	Date Offered	Marked	Admitted	Description
	A				Bank and credit card productions received from Government
	A-1				Amerasia Bank complete document production received from Gov't (SHEPP_003697 – 003945)
	A-2				American Express complete document production received from Gov't (SHEPP_003946 – 006201; April 2023, no bates)

¹ This amended Exhibit List was served on counsel for the United States on September 22, 2023.

	A-3				Bank of America complete document production received from Gov't (SHEPP_006208 – 006368; April 2023, no bates; 011523-030237)
	A-4				Discover Card complete document production received from Gov't (SHEPP_006396 -006606)
	A-5				Intuition College Saving Solutions complete document production received from Gov't (SHEPP_007774 – 007813)
	A-6				SunTrust / Truist complete document production received from Gov't (007814 - 010213; April 2023, no bates)
	A-7				Wells Fargo complete document production received from Gov't (SHEPP_010214 – 010353; April 2023, no bates)
	A-8				Bank United complete document production received from Gov't (April 2023, no bates)
	A-9				City National complete document production received from (Gov't April 2023, no bates)
	A-10				Intercredit Bank complete document production received from Gov't (April 2023, no bates)
	A-11				Key Bank complete document production received from Gov't (April 2023, no bates)
	A-12				One Florida Bank document production received from Gov't (SHEPP_033963 – 034205)
	B-1				American Express Statements for 2018 (D000001 – 000073)
	B-2				American Express Statements for 2019 (D000074 – 000155)
	B-3				American Express Statements for 2020 (D000156 – 000240)
	B-4				American Express Statements for 2021 (D000241 – 000322)
	B-5				Burlington Project Reports (D000323 – 000930; D001131 – 001180)
	B-6				HM Management and Development 2018 General Ledger (D000931 – 000932)
	B-7				HM Management and Development 2019 General Ledger (D000933 – 000980)

	B-8				HM Management and Development 2020 General Ledger (D000981 – 001002)
	B-9				HM Management and Development 2021 General Ledger (D001003 – 001011)
	B-10				HM Up Development 2019 General Ledger (D001012 – 001044)
	B-11				HM Up Development 2020 General Ledger (D001045 – 001082)
	B-12				HM Up Development 2021 General Ledger (D001083 – 001130)
	B-13				Cupersmith complete production, August 2022 (SHEPP_010357 – 010546)
	B-14				Cupersmith complete production, September 8, 2023 (SHEPP_032472 – 033282)
	B-15				Cupersmith complete production received from Gov't, September 12 (SHEPP_033283 – 033619)
	C				Complete PayPal/WebBank production received from Government
	C-1				Advance History Post-Loan composite (SHEPP_000124 – 000125)
	C-2				Activity History (SHEPP_011497 – 011521)
	C-3				Application (5.1.2020) (SHEPP_011294 – 011297)
	C-4				Application (9.20.2020) (SHEPP_000235 – 000240)
	C-5				Application Data (SHEPP_000128)
	C-6				Loan Package w/ Docusign (SHEPP_000241 – 000260)
	C-7				Calculator backup submitted (SHEPP_011303 – 011354)
	C-8				Salesforce PPP-0063297 (SHEPP_000327 – 000328)
	C-9				Notes and Call History (SHEPP_000350)
	C-10				PayPal BFS (SHEPP_011493 – 011496)
	C-11				PayPal Loan Calculator (SHEPP_011268 – 011273)
	C-12				Salesforce (4.22.2020) (SHEPP_000330 – 000333)
	C-13				Salesforce (4.23.2020) (SHEPP_000334 – 000337)
	C-14				Salesforce (4.27.2020) (SHEPP_000338 – 000339)

	D-1				Loan Forgiveness Application (2.5.21) (SHEPP_000227 – 000229)
	D-2				Loan Forgiveness Application (5.19.21) (SHEPP_000129 – 000131)
	D-3				Loan Forgiveness Bank Statements (SHEPP_030258 – 030278)
	D-4				Loan Forgiveness Payroll (SHEPP_030282 – 030301)
	D-5				Loan Forgiveness Utilities (SHEPP_030302)
	D-6				Loan Forgiveness SwiftForce (SHEPP_000317 – 000318)
	D-7				Loan Forgiveness Salesforce (SHEPP_000319 – 000323)
	E				Complete SBA production received from Government
	E-1				HM Management EDIL Application (7.24.20) (SHEPP_000434 – 000436)
	E-2				File Notes (SHEPP_000468 – 000471)
	E-3				Application Overview (SHEPP_030359 – 030383)
	E-4				4506-T Documents composite (SHEPP_030487; 30527; 30528)
	F-1				HM Up Development EIDL Application (7.24.20) (SHEPP_000437 – 000440)
	F-2				File Notes (SHEPP_000488 – 000496)
	F-3				Application Overview (SHEPP_030797 – 030810)
	F-4				4506-T Documents (SHEPP_030885)
	F-5				2019 1065 Return (SHEPP_030862 – 030884)
	G-1				EIDL Application (10.22.2020) (SHEPP_000441-000443)
	G-2				Loan & Security Agreement (SHEPP_000644 – 000662)
	G-3				Correspondence 1 (SHEPP_000612)
	G-4				Correspondence 2 (SHEPP_000624)
	G-5				Correspondence 3 (SHEPP_000628 – 000637)
	G-6				File Notes (SHEPP_000472 – 000480)
	G-7				Bank Letter (SHEPP_000619)
	G-8				Bank Statement (SHEPP_000641)
	G-9				Voided Check and Direct Deposit (SHEPP_000617 – 000618)
	G-10				HM Four / HM Eight Agreement

	G-11				New Lease Agreement (SHEPP_000579 – 000590)
	G-12				Memo explaining ownership (SHEPP_000575 – 000578)
	H-1				Application Data (SHEPP_011359)
	H-2				Application with backup 011472 – 011488
	H-3				Addendum (SHEPP_030257)
	H-4				PayPal Emails
	H-5				“Missing 1 payroll verification from 22262021” (SHEPP_030330 – 030346)
	H-6				Reduction of Business Memo (1.23.21) (SHEPP_011460 – 011471)
	H-7				Additional Information Memo (2.15.21) (SHEPP_011411)
	H-8				Certification of Florida Memo (3.2.21) (SHEPP_011375 – 011386)
	H-9				Same Quarter Decline in Receipts Memo (3.2.21) (SHEPP_011360 – 011374)
	H-10				HM Up 2020 Q1 941 (SHEPP_011457 – 011458)
	H-11				HM Up 2020 Q2 941 (SHEPP_011453 – 011454)
	H-12				HM Up 2020 Q3 941 (SHEPP_011450 – 011452)
	H-13				HM Up 2020 Q4 941 (SHEPP_011447 – 011449)
	H-14				2020 1065 for HM Up (SHEPP_011391 – 011405)
	H-15				Gross Receipts Second Draw App (2.23.21) (SHEPP_030303 – 030322)
	I				Complete ACAP SME and Northeast Bank productions received from Government
	I-1				Backend Portal Screenshots (SHEPP_031402 – 031418)
	I-2				Application (3.12.21) (SHEPP_000409 – 000415)
	I-3				Note and Second Application (3.17.21) (SHEPP_000416 – 000430)
	I-4				DocuSign Note Package (SHEPP_010864 – 010867)
	I-5				File Request Notes (SHEPP_011203)
	I-6				Loan Tab Details (SHEPP_011239 – 011244)

	I-7				HM Up 2020 Q1 941 (SHEPP_000393 – 000394)
	I-8				HM Up 2020 940 (SHEPP_000391 – 000392)
	I-9				HM Up 2020 Q1 RT-6 (SHEPP_000395 – 000396)
	I-10				UW Template (SHEPP_011250 – 011257)
	I-11				ACAP Doc Log
	J				Complete Cross River Bank production received from Government
	J-1				Application (3.12.21) (SHEPP_000012 – 000015)
	J-2				Salesforce Opportunity (SHEPP_000110 – 000116)
	J-3				Note and Application (SHEPP_000018 – 000040)
	J-4				HM Mgmt. 2020 940 (SHEPP_000054 – 000055)
	J-5				2020 1065 for HM Mgmt. (SHEPP_000041 – 000053)
	J-6				Funding Worksheet (SHEPP_000109)
	J-7				Cross River “Guide” Chart (SHEPP_000108)
	K-1				Complete production of documents from J.G. on September 19, 2023 (SHEPP_034443 – 034539)

Dated: November 10, 2023.

Respectfully submitted,

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