

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 NOTICE  
OF INTENT TO UTILIZE ADDITIONAL EXPERT TESTIMONY**

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

The qualifications of the expert witness, John E. Jorgensen of The Sylint Group, Inc. ("Sylint"), are described in his CV, which is attached to this Notice as **Exhibit A**.

Mr. Jorgensen is President, CEO, and Founding Partner of Sylint. Sylint provides consulting and professional services for Cyber Security, Industrial Counter-Espionage, Counter Cyber Warfare, eDiscovery, Signal Analysis, and Digital Data Forensic Investigations, nationally and internationally. This includes computer systems and digital data forensic analysis, and evidentiary data recovery and collection.

### **Opinions**

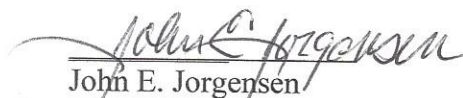
Mr. Jorgensen will testify:

1. The November 12, 2020 email (“Barrios Email”) admitted as Defendant’s Exhibit M-19 at trial was sent by Heimdal Barrios ([heimdal.barrios@suntrust.com](mailto:heimdal.barrios@suntrust.com)) to Eric Sheppard ([eric.sheppard10@gmail.com](mailto:eric.sheppard10@gmail.com)) on November 12, 2020 at 11:13 a.m. eastern time.
2. The Barrios Email contains a Microsoft Word document attachment entitled “eric.docm” (“Barrios Attachment”).
3. A “docm” file is a macro-formatted Microsoft Word document, typically used by financial entities for form documents.
4. The Barrios Attachment was last modified on November 12, 2020 at 11:12 a.m. eastern time by user Barrios.Heimdal.

### **Basis for Opinions**

Mr. Jorgensen’s opinions and anticipated testimony are based on facts and data reasonably relied upon by forensic computer experts. Mr. Jorgensen’s testimony will draw upon his expertise and experience, which is reasonably relied upon by forensic computer experts.

Mr. Jorgensen’s opinions and anticipated testimony are also based on his review of the native Barrios Email (.msg format), which contains the native Barrios Attachment (.docm format). Mr. Jorgensen received this document from defense counsel. Defendant is producing the native Barrios Email to the Government contemporaneous with the filing of this Notice.

  
John E. Jorgensen  
The Sylint Group, Inc.

Dated: January 7, 2024.

Respectfully submitted,

**NELSON MULLINS**

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By: /s/ Christopher Cavallo

Jayne C. Weintraub

Florida Bar No. 320382

Christopher Cavallo

Florida Bar No. 0092305

Jonathan Etra

Florida Bar No. 686905

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 7, 2024, 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/ Christopher Cavallo

Christopher Cavallo