

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

**Case No. 22-20290-CR-BLOOM(s)**

**UNITED STATES OF AMERICA**

**vs.**

**ERIC DEAN SHEPPARD,**

**Defendant.**

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**UNITED STATES' NOTICE OF FILING SUPPLEMENTAL  
AUTHORITY IN SUPPORT OF UNITED STATES' RESPONSE TO  
DEFENDANT'S MOTION FOR JUDGMENT OF ACQUITTAL**

The United States of America, through the undersigned Assistant United States Attorney, hereby files this notice of supplemental authority in support of its response to the defendant's motion for judgment of acquittal, and in response to the Court's inquiry regarding post-*Takhalov* cases on the wire fraud issue of intent to defraud/harm. The government refers the Court to *United States v. Watkins*, 42 F.4<sup>th</sup> 1278 (11<sup>th</sup> Cir. 2022), and *United States v. Waters*, 937 F.3d 1344 (11<sup>th</sup> Cir. 2019).

Respectfully Submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 9, 2024, the undersigned Assistant United States Attorney electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Aimee C. Jimenez  
AIMEE C. JIMENEZ  
Assistant United States Attorney