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8 Attorneys for Plaintiff
UNITED STATES OF AMERICA
9

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 ANDREW MARNELL,

16 Defendant.

No. CR 20-319-RGK

JOINT REPORT RE: DISCOVERY
CONFERENCE

Trial Date: September 29, 2020

Trial Time: 9:00 a.m.

Location: Courtroom of the
Hon. R. Gary Klausner

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18 Plaintiff United States of America, by and through its counsel
19 of record, the United States Attorney for the Central District of
20 California and Assistant United States Attorney ("AUSA") Kerry L.
21 Quinn, and defendant Andrew Marnell ("defendant"), by and through his
22 counsel of record, Deputy Federal Public Defender ("DFPD") Adithya
23 Mani, hereby report the following, pursuant to the Court's Criminal
24 Order Regarding Discovery (the "Court's Standing Discovery Order"):

25 (a) On August 13, 2020, the parties conducted a discovery
26 conference pursuant to the Court's Standing Discovery Order. AUSA
27 Quinn and DFPD Mani participated in the conference, which was
28 conducted by way of teleconference on August 13, 2020. The parties

1 have had ongoing discussions regarding discovery in this case, dating
2 back to defendant's arrest on July 16, 2020.

3 (b) The parties have not presently identified any contested
4 matter of discovery and inspection, but each party reserves the right
5 to raise issues as they arise. The government has produced
6 approximately 4,500 pages of documents and files as part of discovery
7 in this case, which includes agent reports, bank and other financial
8 records, records from casinos, surveillance photos, search and
9 seizure warrants and related documents, recordings from defendant's
10 arrest, records from state taxing authorities, and criminal history
11 reports, among other documents and files. The government's
12 investigation is ongoing, and it anticipates producing additional
13 discovery on a rolling basis.

14 (c) The government is aware of its obligations to produce
15 material favorable to defendant within the meaning of Brady v.
16 Maryland, 373 U.S. 83 (1963) and related cases, and it has complied
17 with and will continue to comply with these obligations.

18 (d) The parties have not presently identified any foundational
19 or chain of custody objections to evidence that may be offered at
20 trial, but each party reserves the right to make such objections as
21 warranted.

22 (e) The discovery in this case does not presently include any
23 evidence that requires scientific analysis, but if either party
24 identifies any such evidence, the parties will confer about the

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possibility of resolving the admissibility of the scientific analysis
without the need to call an expert to testify at trial.

Dated: August 14, 2020

Respectfully submitted,

NICOLA T. HANNA
United States Attorney

BRANDON D. FOX
Assistant United States Attorney
Chief, Criminal Division

/s/ Kerry L. Quinn

KERRY L. QUINN
Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

Dated: August 14, 2020

/s/ by email authorization

ADITHYA MANI
Deputy Federal Public Defender

Attorney for Defendant
ANDREW MARNELL