

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

CASE NO. 26-CR-60019-ALTMAN/STRAUSS

UNITED STATES OF AMERICA

vs.

ROODY METELUS,

Defendant.

/

**GOVERNMENT'S RESPONSE TO THE
STANDING DISCOVERY ORDER**

The United States hereby files this response to the Standing Discovery Order. This response also complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16, and is numbered to correspond with Local Rule 88.10.

A.

1. The government is unaware of any written or recorded statements made by the defendant.
2. The government is unaware of any oral statements made by the defendant before or after arrest in response to interrogation by any person then known to the defendant to be a government agent that the government intends to use at trial.
3. The defendant did not testify before the Grand Jury.
4. The NCIC records check of the defendant is attached.
5. Books, papers, documents, photographs, tangible objects, buildings or places which the government intends to use as evidence at trial to prove its case in chief, or were obtained or belonging to the defendants are attached to this discovery response and are identified below.

First United Bank loan files
Abrigo-Sageworks copies of loan files
Liberty Tax records for customers of the defendant

Liberty Tax records reflecting activity on Liberty Tax systems
IRS records
Bank subpoena responses
PPP Records from Sunshine State Economic Development
Reports of interviews and affidavits
State of Florida, Department of Corporations records
NCIC report for the defendant.

6. There were no physical or mental examinations or scientific tests or experiments made in connection with this case.

B. DEMAND FOR RECIPROCAL DISCOVERY: The United States requests the disclosure and production of materials enumerated as items 1, 2 and 3 of Section B of the Standing Discovery Order. This request is also made pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure.

The government specifically requests the production of any records or evidence the defendant intends to use at trial in this case.

- C. The government will disclose any information or material which may be favorable on the issues of guilt or punishment within the scope of *Brady v. Maryland*, 373 U.S. 83 (1963), and *United States v. Agurs*, 427 U.S. 97 (1976).
- D. The government will disclose any payments, promises of immunity, leniency, preferential treatment, or other inducements made to prospective government witnesses, within the scope of *Giglio v. United States*, 405 U.S. 150 (1972), or *Napue v. Illinois*, 360 U.S. 264 (1959).
- E. The government will disclose any prior convictions of any alleged co-conspirator, accomplice or informant who will testify for the government at trial.
- F. The defendant was the subject of an identification procedure involving a photo array shown to some of the persons interviewed.
- G. The government has advised its agents and officers involved in this case to preserve all rough notes.
- H. The government will timely advise the defendant of its intent, if any, to introduce during its case in chief proof of evidence pursuant to F.R.E. 404(b). You are hereby on notice that all evidence made available to you for inspection, as well as all statements disclosed herein or in any future discovery letter, may be offered in the trial of this cause, under F.R.E. 404(b) or otherwise (including the inextricably-intertwined doctrine).

- I. The defendant is not an aggrieved persons, as defined in Title 18, United States Code, Section 2510(11), of electronic surveillance.
- J. The government has ordered the Grand Jury testimony of all witnesses who will testify for the government at the trial of this cause.
- K. The government will, upon defense request, deliver to any laboratory presently registered with the Attorney General in compliance with 21 U.S.C. § 822 and § 823 and 21 C.F.R. 1301.13, a sufficient representative sample of any alleged contraband which is the subject of this indictment to allow independent chemical analysis of such sample.

If there is no response within ten (10) days from the date of the Certificate of Service attached hereto, the bulk of the narcotics will be destroyed. As usual, random samples will be set aside to be used as evidence at trial.

- L. The government does not know of any automobile, vessel, or aircraft allegedly used in the commission of this offense that is in the government's possession.
- M. To date, the government is not aware of any latent fingerprints or palm prints which have been identified by a government expert as those of the defendant.
- N. To date, the government has not received a request for disclosure of the subject matter of expert testimony that the government reasonably expects to offer at trial.
- O. The government will make every possible effort in good faith to stipulate to all facts or points of law the truth and existence of which is not contested and the early resolution of which will expedite trial. These stipulations will be discussed at the discovery conference.
- P. At a discovery conference to be scheduled pursuant to Section A.5, above, the government will seek written stipulations to agreed facts in this case, to be signed by the defendant and defense counsel.

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, *Brady*, *Giglio*, *Napue*, and the obligation to assure a fair trial.

Sent via USAFX are records with bate-stamp range:

Discovery01_000001 through 016693.

Respectfully submitted,

JASON A. REDING QUIÑONES
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 20, 2026, I electronically filed the foregoing document, Government's Response to the Standing Discovery Order (without attachments), with the Clerk of the Court using CM/ECF. A copy of the documents identified in this discovery response were sent via the USAFX portal on February 19, 2026, to counsel for the defendant, David Tarras, Esq., at david@tarrasdefense.com.

s/Aimee Jimenez_____

Aimee C. Jimenez
Assistant United States Attorney