UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 21-20242-CR-ALTONAGA/TORRES

UNITED STATES OF AMERICA,

v.

JOSEPH TIMOTHY GRENON,

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 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.

2. Copies of audio and video tapes which contain recordings of statements made by the Defendant have been provided to the Defendant by separate mailing.

3. No defendant testified before the Grand Jury.

4. The prior criminal record of the Defendant has been provided to the Defendant by separate mailing.

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 Defendant, have been provided to the Defendant by separate mailing to the extent practicable, but not filed with the Court. Other items, including additional items that may become available at a later date, may be inspected at a mutually convenient time by making arrangements with the undersigned Assistant United States

Attorneys, who will facilitate such inspection with the United States Marshals Service.

The materials referenced in this discovery response are not necessarily copies of all the books, papers, documents, etc., that the government may intend to introduce at trial.

6. A laboratory analysis report regarding the substances seized in connection with this case, including substances labeled "Sacramental Cleansing Powder" and "Sacramental Cleansing Water," has been provided to the Defendant by separate mailing.

B. DEMAND FOR RECIPROCAL DISCOVERY: The United States requests the disclosure and production of materials enumerated as items 1 and 2 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.

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. No defendant was identified in a lineup, show up, photo spread or similar identification proceedings.

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). The Defendant is hereby on notice that all evidence made available 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 person, as defined in Title 18, United States Code, Section 2510(11), of any electronic surveillance.

J. The government has ordered transcribed the Grand Jury testimony of all witnesses who will testify for the government at the trial of this cause.

K. No controlled substance is involved in this indictment.

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. 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. 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.

O. The government is available for a pretrial discovery conference as required by Rule 16.1 of the Federal Rules of Criminal Procedure and Local Rule 88.10(o).

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.

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Discovery materials referenced in this response numbered GOV01-000001 through GOV01-110989 have been provided to the Defendant by separate mailing. Discovery materials referenced in this response numbered GOV01-110990 through GOV01-117595 and SWGR-00000001 through SWGR-00702566 will be provided to the Defendant by separate mailing shortly, upon receipt by the government of an external hard drive with sufficiently large storage capacity to allow for the storage of such discovery materials.

Respectfully submitted,

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 13, 2022, I caused a true and correct copy of the foregoing, and the discovery materials referenced therein, to be delivered via Certified Mail to *pro se* Defendant Joseph Timothy Grenon at the Miami Federal Detention Center, Inmate Mail/Parcels, Post Office Box 019120, Miami, Florida 33101.

/s/ Michael B. Homer
MICHAEL B. HOMER
Assistant United States Attorney