UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
V.	*	**Cr. No. GLR-23-026**
RYAN DALES	*	
Defendant	*	
For: RYAN DALES	*	

SUPPLEMENT TO MOTION FOR RECONSIDERATION

Defendant, Ryan Dales, submits this supplement to his motion for reconsideration to supplement the record and correct an incorrect statement in that motions and states ;

In his motion, ECF 76, the motion states "Discovery in this case, by undersigned counsel'[s] careful review, does not provide any source for the affiant's allegation that the IP address "resolved" to the VOA.." ECF 76, p.7, n.7. After receiving the defendant's motion, the Government contacted defense counsel to point out that the statement in the motion is incorrect. In fact, at page 31,305 of the discovery there is a single page, attached hereto as Exhibit 1, from Verizon that identifies the Volunteers of America as being related to IP address. Defense counsel had not found that document among the over 38,000 pages of discovery.

In any event, that reference and the source of the IP address "resolving" to the VOA was not included in the search warrant affidavit and that affidavit remains insufficient under the *Aguilar*/*Spinelli* line of cases as cited in the motion for reconsideration. Further, this Verizon document does not give any indication of whether a computer at VOA or a cell phone was used to connect to the internet when the COVID loan applications were filed.

Respectfully submitted,

_____/s/_____
Richard Bardos
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st of October, 2024, a copy of the foregoing was served electronically by ECF to: Office of the United States Attorney, 36 South Charles Street, Fourth Floor, Baltimore, Maryland 21201 and all defense counsel.

_____/s/_____
Richard Bardos