**IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON**

**UNITED STATES OF AMERICA**

**v.** **CRIMINAL NO. 2:23-cr-00123**

**SEAN PATRICK BOYD, JR.**

**SEPTEMBER 26, 2023, SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA TO DEFENDANT'S STANDARD DISCOVERY REQUESTS, REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY, AND NOTICE OF THE UNITED STATES'S INTENT TO OFFER EVIDENCE OF RECORDS OF REGULARLY CONDUCTED ACTIVITY**

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, Rule 16.1(a) of the Local Rules of Criminal Procedure, and the Arraignment Order and Standard Discovery Request entered by the Court in this case on September 8, 2023, the United States of America, by counsel, herewith responds to each of defendant's Standard Discovery Requests as follows:

**Request E: Permit the defendant to inspect and to copy or photograph books, papers, documents, data, photographs, tangible objects, building or places, or copies or portions of any of those items, if the item is within the government's possession, custody or control, and (i) the item is material to preparing the defense; (ii) the government intends to use the item in its case-in-chief at trial; or (iii) the item was obtained from or belongs to defendant. [Fed. R. Crim. P. 16(a)(1)(E)]**

**Response:** The government will allow counsel for defendant to inspect any item of evidence he deems appropriate. Counsel should contact AUSA Jonathan T. Storage as soon as possible to arrange a

mutually agreeable time to view the evidence. The following is being provided:

| | | |
|---|---|---|
| BOYD-000437 | | SBA – Transcript of Account |
| BOYD-000438 | | SBA – Certificate of Indebtedness |
| BOYD-000439 | | SBA – Certified Statement of Account |

**REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY**

Pursuant to Rules 16.1(b) and 16.1(d) of the Local Rules of Criminal Procedure, the United States of America requests that defendant provide all applicable reciprocal discovery within 14 days of the service of this response and the provision of materials requested by defendant in the Standard Discovery Request.

**NOTICE OF THE UNITED STATES INTENT TO OFFER EVIDENCE OF RECORDS OF REGULARLY CONDUCTED ACTIVITY**

Pursuant to Federal Rules of Evidence 902(11), notice is hereby given of the United States intent to offer into evidence certified domestic records of regularly conducted activity. The records are referred to more specifically in Response E above.

Respectfully submitted,

WILLIAM S. THOMPSON
United States Attorney

By:

/s/ Jonathan T. Storage

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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing "SEPTEMBER 26, 2023, SUPPLEMENTAL RESPONSE OF THE UNITED STATES OF AMERICA TO DEFENDANT'S STANDARD DISCOVERY REQUESTS, REQUEST OF THE UNITED STATES FOR RECIPROCAL DISCOVERY, AND NOTICE OF THE UNITED STATES'S INTENT TO OFFER EVIDENCE OF RECORDS OF REGULARLY CONDUCTED ACTIVITY" has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing this 26th day of September , 2023 to:

Emily L. Szopinski, Assistant Federal Public Defender
Robert C. Byrd United States Courthouse
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Charleston, West Virginia 25301

/s/Jonathan T. Storage
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