



U. S. Department of Justice

**United States Attorney  
Central District of California**

Douglas M. Miller  
Assistant United States Attorney  
(213) 894-2216

1300 United States Courthouse  
312 North Spring Street  
Los Angeles, CA 90012

March 31, 2011

TRANSMITTED VIA EMAIL

All Defense Counsel of Record

Re: United States v. Enrique Faustino Aguilar Noriega, et al.  
CR 10-1031(A)-AHM

Dear Counsel:

Please find attached the Joint Trial Witness Time Estimate Form, which according to the Court's standing order for criminal trials should be completed by the parties. As you will note, the government has listed its expected trial witnesses (see 3/31/11 Gov't Let.) and its estimates for the length of its direct examinations. Kindly fill-in your cross-examination estimates, as well as your defense witnesses.

Very truly yours,

ANDRÉ BIROTTE JR.  
United States Attorney

/s/  
DOUGLAS M. MILLER  
Assistant United States Attorney

NICOLA J. MRAZEK  
JEFFREY A. GOLDBERG  
Senior Trial Attorneys  
Criminal Division, Fraud Section  
United States Department of Justice

Attachment

JUDGE A. HOWARD MATZ

JOINT TRIAL WITNESS TIME ESTIMATE FORM

CASE: U.S. v. Noriega, et al.

TRIAL DATE: April 5, 2011

|    | WITNESS NAME                      | PARTY CALLING WITNESS AND ESTIMATE | X-EXAMINER'S ESTIMATE | DESCRIPTION OF TESTIMONY                | COMMENTS                  |
|----|-----------------------------------|------------------------------------|-----------------------|---|---------------------------|
| 1  | ABARCA, ERICA                     | GOVERNMENT (.15)                   |                       | CURRENT GLOBAL EMPLOYEE (GRUPO ACCOUNT) |                           |
| 2  | BASURTO, SR.<br>FERNANDO GONZALEZ | (1.0)                              |                       | COOPERATING WITNESS                     |                           |
| 3  | BASURTO, JR.<br>FERNANDO MAYA     | (2.0)                              |                       | COOPERATING WITNESS                     | IN CUSTODY                |
| 4  | BATES, JANE ELLEN                 | (2.5)                              |                       | CURRENT GLOBAL EMPLOYEE (GRUPO ACCOUNT) |                           |
| 5  | BERMAN, SHARON                    | (.50)                              |                       | FERRARI OF BEVERLY HILLS                |                           |
| 6  | BINDER, FARELL                    | (1.0)                              |                       | FBI AGENT (CASE AGENT)                  |                           |
| 7  | BOUTARASY, KARYN                  | (.5)                               |                       | CURRENT LMC EMPLOYEE                    |                           |
| 8  | BROWN, MINETTE                    | (.5)                               |                       | CURRENT LMC EMPLOYEE                    |                           |
| 9  | BUSTANI, EDUARDO                  | (2.0)                              |                       | FORMER GLOBAL EMPLOYEE (GRUPO ACCOUNT)  |                           |
| 10 | CEEDAN SAANEDRA,<br>ALMA PATRICIA | (1.5)                              |                       | ANGELA AGUILAR'S NEIGHBOR (MEXICO)      | NEEDS SPANISH INTERPRETER |
|    | TOTAL ESTIMATES THIS PAGE:        |                                    |                       |   |                           |

Instructions:

(1) List witnesses (last name first); (2) For description, be extremely brief. e.g., "eyewitness to accident." Or "expert on standard of care." (3) Use estimates within fractions of an hour, rounded off to closest quarter of an hour. E.g., if you estimate 20 minutes, make it .25. An estimate of one and one-half hours would be 1.5. An estimate of three-quarters of an hour would be .75; (4) Note special factors in "Comments" column. E.g., "Needs interpreter." (5) Entries may be in handwriting if very neat and legible.

JUDGE A. HOWARD MATZ

JOINT TRIAL WITNESS TIME ESTIMATE FORM

CASE: U.S. v. Noriega, et al.

TRIAL DATE: April 5, 2011

|    | WITNESS NAME               | PARTY CALLING WITNESS AND ESTIMATE | X-EXAMINER'S ESTIMATE | DESCRIPTION OF TESTIMONY                | COMMENTS                  |
|----|----------------------------|------------------------------------|-----------------------|---|---------------------------|
| 1  | CIZI GIGIANO, RALPH        | GOVERNMENT (1.0)                   |                       | FORMER UMC EMPLOYEE                     |                           |
| 2  | CORTEZ, SERGIO             | (1.75)                             |                       | CURRENT UMC EMPLOYEE                    |                           |
| 3  | COSTLEY, DANE              | (3.0)                              |                       | FBI AGENT (SUMMARY WITNESS)             |                           |
| 4  | DE GHIETTO, MICHAEL        | (1.0)                              |                       | FORMER UMC EMPLOYEE                     |                           |
| 5  | DELGADO, CONCEPCION        | (.75)                              |                       | ANGELA AGUILAR'S FRIEND                 | NEEDS SPANISH INTERPRETER |
| 6  | DODSON, CHRISTOPHER        | (.5)                               |                       | FBI AGENT (INTERVIEWED STEVE LEE)       |                           |
| 7  | ERICKSON, PAUL             | (.75)                              |                       | CURRENT UMC EMPLOYEE                    |                           |
| 8  | GARZA, LAURA               | (1.0)                              |                       | CURRENT GLOBAL EMPLOYEE (GRUPO ACCOUNT) |                           |
| 9  | GOODMAN, ROBIN             | (.75)                              |                       | SOUTH SHORE YACHT SALES                 |                           |
| 10 | HARVIN, ANDREW             | (.5)                               |                       | ATTORNEY FOR GLOBAL (GRUPO ACCOUNT)     |                           |
|    | TOTAL ESTIMATES THIS PAGE: |                                    |                       |   |                           |

Instructions:

(1) List witnesses (last name first); (2) For description, be extremely brief, e.g., "eyewitness to accident." Or "expert on standard of care." (3) Use estimates within fractions of an hour, rounded off to closest quarter of an hour. E.g., if you estimate 20 minutes, make it .25. An estimate of one and one-half hours would be 1.5. An estimate of three-quarters of an hour would be .75; (4) Note special factors in "Comments" column. E.g., "Needs interpreter." (5) Entries may be in handwriting if very neat and legible.

JUDGE A. HOWARD MATZ

JOINT TRIAL WITNESS TIME ESTIMATE FORM

TRIAL DATE: April 5, 2011

CASE: U.S. v. Noriega, et al.

|    | WITNESS NAME               | PARTY CALLING WITNESS AND ESTIMATE | X-EXAMINER'S ESTIMATE | DESCRIPTION OF TESTIMONY                    | COMMENTS                 |
|----|----------------------------|------------------------------------|-----------------------|---|--------------------------|
| 1  | KILBREW, BRUCE             | GOVERNMENT (.75)                   |                       | SOUTH SHORE YACHT SALES                     |                          |
| 2  | KJOK, CONNIE               | (.5)                               |                       | FORMER UMC EMPLOYEE                         |                          |
| 3  | KJOK, MANG HUE             | (1.0)                              |                       | CURRENT UMC EMPLOYEE                        |                          |
| 4  | LAMARCHE, JEAN-GUY         | (4.0)                              |                       | EMPIQUE AGUILAR'S FORMER EMPLOYEE           | NEEDS FRENCH INTERPRETER |
| 5  | MORENO, GENOVEVA           | (.5)                               |                       | BAJA HORIZON LLC (YACHT)                    |                          |
| 6  | MORENO, JEMA               | (.5)                               |                       | CESAR MORENO'S DAUGHTER                     |                          |
| 7  | MORENO, ROBERT             | (.5)                               |                       | INSURANCE AGENT (FERRARI)                   |                          |
| 8  | PALMER, JAIME              | (.75)                              |                       | CURRENT BLUFFVIEW EMPLOYEE (GIULIO ACCOUNT) |                          |
| 9  | SEOCKI, RICHARD            | (1.0)                              |                       | FORMER UMC EMPLOYEE                         |                          |
| 10 | SPILLANE, PHILIP           | (.75)                              |                       | CURRENT UMC EMPLOYEE                        |                          |
|    | TOTAL ESTIMATES THIS PAGE: |                                    |                       |   |                          |

Instructions: (1) List witnesses (last name first); (2) For description, be extremely brief, e.g., "eyewitness to accident." Or "expert on standard of care." (3) Use estimates within fractions of an hour, rounded off to closest quarter of an hour. E.g., if you estimate 20 minutes, make it .25. An estimate of one and one-half hours would be 1.5. An estimate of three-quarters of an hour would be .75; (4) Note special factors in "Comments" column. E.g., "Needs interpreter." (5) Entries may be in handwriting if very neat and legible.

JUDGE A. HOWARD MATZ

JOINT TRIAL WITNESS TIME ESTIMATE FORM

CASE: U.S. v. Noriega, et al.

TRIAL DATE: April 5, 2011

|    | WITNESS NAME               | PARTY CALLING WITNESS AND ESTIMATE | X-EXAMINER'S ESTIMATE | DESCRIPTION OF TESTIMONY             | COMMENTS |
|----|----------------------------|------------------------------------|-----------------------|--------------------------------------|----------|
| 1  | VARCO, SUZANNE             | GOVERNMENT (.5)                    |                       | NESTOR MORENO'S NEIGHBOR (SAN DIEGO) |          |
| 2  | WILUETT, BRYAN             | (1.0)                              |                       | FBI AGENT (INTERVIEWED STEVE LEE)    |          |
| 3  | ZAVALETA, JOE              | (2.0)                              |                       | FORMER LMC EMPLOYEE                  |          |
| 4  |                            |                                    |                       |                                      |          |
| 5  |                            |                                    |                       |                                      |          |
| 6  |                            |                                    |                       |                                      |          |
| 7  |                            |                                    |                       |                                      |          |
| 8  |                            |                                    |                       |                                      |          |
| 9  |                            |                                    |                       |                                      |          |
| 10 |                            |                                    |                       |                                      |          |
|    | TOTAL ESTIMATES THIS PAGE: |                                    |                       |                                      |          |

Instructions:

(1) List witnesses (last name first); (2) For description, be extremely brief, e.g., "eyewitness to accident." Or "expert on standard of care." (3) Use estimates within fractions of an hour, rounded off to closest quarter of an hour. E.g., if you estimate 20 minutes, make it .25. An estimate of one and one-half hours would be 1.5. An estimate of three-quarters of an hour would be .75; (4) Note special factors in "Comments" column. E.g., "Needs interpreter." (5) Entries may be in handwriting if very neat and legible.