



U. S. Department of Justice

*United States Attorney
Central District of California*

*Douglas M. Miller
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(213) 894-2216*

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

March 31, 2011

*****CORRECTED*****

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:

The government writes regarding the witnesses that it intends to call during its case-in-chief. Please note, however, that the information set forth below is subject to change and is dependent upon, among other things, future rulings by the Court, the willingness of the defendants to enter into stipulations, the nature of the defendants' opening statements and cross-examinations, and other circumstances. The government intends to call the following 33 witnesses:

1. Erica Abarca
2. Fernando Gonzalez Basurto, Sr.
3. Fernando Maya Basurto, Jr.
4. Jane Ellen Bates
5. Sharon Berman
6. Special Agent Farrell Binder
7. Karyn Boutarasy
8. Minette Brown
9. Eduardo Bustani
10. Alma Patricia Cerdan Saavedra
11. Ralph Cirigliano
12. Sergio Cortez
13. Special Agent Dane Costley
14. Michael De Ghetto
15. Concepcion Delgado
16. Special Agent Christopher Dodson
17. Paul Erickson

18. Laura Garza
19. Robin Goodman
20. Andrew Harvin
21. Bruce Killebrew
22. Connie Kwok
23. Mang Hue "Mindy" Kwok
24. Jean-Guy Lamarche
25. Genoveva Moreno
26. Jema Moreno
27. Robert Moreno
28. Jaime Palmer
29. Richard Serocki
30. Philip Spillane
31. Suzanne Varco
32. Special Agent Bryan Willett
33. Jose Gabriel Zavaleta

The government will give you additional notice as the trial progresses by informing you the day before each trial day as to who the government expects to call during the next trial day. So, for example, sometime after court is adjourned on Tuesday, April 5, 2011, the government will notify you in writing as to which witnesses the government intends to call on April 6. These notifications will be made as soon as practicable, but no later than three hours after court is adjourned. With respect to the witnesses expected to be called on April 5, the government will notify you in writing by 1:00 p.m. on Monday, April 4.

Lastly, the government requests the production of any defense witness statements.

Very truly yours,

ANDRÉ BIROTTE JR.
United States Attorney

/s/
DOUGLAS M. MILLER
Assistant United States Attorney

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