

1 ANDRÉ BIROTTE JR.
 United States Attorney
 2 ROBERT E. DUGDALE
 Assistant United States Attorney
 3 Chief, Criminal Division
 DOUGLAS M. MILLER (SBN: 240398)
 4 Assistant United States Attorneys
 NICOLA J. MRAZEK
 5 JEFFREY A. GOLDBERG
 Senior Trial Attorneys
 6 1300 United States Courthouse
 312 North Spring Street
 7 Los Angeles, California 90012
 Telephone: (213) 894-2216
 8 Facsimile: (213) 894-6436
 Email: douglas.m.miller@usdoj.gov
 9

Attorneys for Plaintiff
 10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,) CR No. 10-1031(A)-AHM
)
 14 Plaintiff,) GOVERNMENT'S WITNESS LIST
)
 15 v.)
 ENRIQUE FAUSTINO AGUILAR)
 16 NORIEGA, ANGELA MARIA) [UNDER SEAL]
 GOMEZ AGUILAR, KEITH E.)
 17 LINDSEY, STEVE K. LEE, and)
 LINDSEY MANUFACTURING)
 18 COMPANY,)
)
 19 Defendants.)
)
 20

21 Plaintiff United States of America, by and through its
 22 attorneys of record, the United States Department of Justice,
 23 Criminal Division, Fraud Section, and the United States Attorney
 24 for the Central District of California (collectively, "the
 25 government"), hereby files its witness list for the above-
 26 captioned case. At this time, the witness list includes several
 27 witnesses the government anticipates will be eliminated by way of
 28 stipulations from the defense regarding things such as chain-of-

1 custody, authenticity of documents, and the uncontested elements
2 of the offenses. Therefore, the government reserves the right to
3 supplement or modify this witness list:

- 4 1. Erica Abarca
- 5 2. Angela "Angie" Aguilar
- 6 3. Erik Alvarez
- 7 4. Fernando Gonzalez Basurto
- 8 5. Fernando Maya Basurto
- 9 6. Jane Ellen Bates
- 10 7. Sharon Berman
- 11 8. Ajesh Sanmukh Bhakta
- 12 9. Special Agent Farrell Binder
- 13 10. Karyn Boutarasy
- 14 11. Minette Brown
- 15 12. Eduardo Bustani
- 16 13. Special Agent Stephen Caivano
- 17 14. Daniel Cardenas
- 18 15. Tina Cathcart
- 19 16. Alma Patricia Cerdan Saavedra
- 20 17. Ralph Cihigliano
- 21 18. Sergio Cortez
- 22 19. Special Agent Dane Costley
- 23 20. Ana Cuellar
- 24 21. Silvia Cuevas
- 25 22. Paul Erickson
- 26 23. Marisela Garcia

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- 1 24. Michael De Ghetto
- 2 25. Special Agent Lisa Diemart
- 3 26. Special Agent Christopher Dodson
- 4 27. Special Agent Rick Esselbach
- 5 28. Manuel Gutierrez
- 6 29. Patricia Gomez Cepeda
- 7 30. Special Agent Jose Garcia
- 8 31. Special Agent Roman Garcia
- 9 32. Laura Garza
- 10 33. Robin Goodman
- 11 34. Andrew Harvin
- 12 35. Special Agent Tracy Hanlon
- 13 36. Special Agent Kendall Hopper
- 14 37. Abel Huitron
- 15 38. Jose Miguel Iturbe
- 16 39. Christopher Joaquin
- 17 40. Special Agent Gigi Joyner
- 18 41. Bruce Killebrew
- 19 42. Bryant Kreaden
- 20 43. Connie Kwok
- 21 44. Mang Hue "Mindy" Kwok
- 22 45. Jean-Guy Lamarche
- 23 46. Aura Velasquez Martinez
- 24 47. Patrick McConnell
- 25 48. Jaime Palmer
- 26 49. Mariano Ornelas Lopez

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WARNING: CONTENTS SUBJECT TO PROTECTIVE ORDER

- 1 50. Colleen Lindsey
- 2 51. Jordan Lindsey
- 3 52. Hugo Lopez
- 4 53. Sandra Macias
- 5 54. Special Agent Warren Martin
- 6 55. Special Agent Rudolfo Mendoza
- 7 56. Special Agent Charles Moon
- 8 57. Genoveva Moreno
- 9 58. Jema Moreno
- 10 59. Kelley Moreno
- 11 60. Robert Moreno
- 12 61. Special Agent Carlos Narro
- 13 62. Jaime Palmer
- 14 63. Ricardo Perusquia
- 15 64. Mario Pineda
- 16 65. Special Agent Monica Richardson
- 17 66. Stephen Schofield
- 18 67. Richard Serocki
- 19 68. Special Agent Jennifer Smith
- 20 69. Philip Spillane
- 21 70. Steve Tenison
- 22 71. Lu Tiong
- 23 72. Rochelle Torres
- 24 73. Special Agent Tandra Waldrup
- 25 74. Cristopher Wenthur
- 26 75. Special Agent Bryan Willet

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WARNING: CONTENTS SUBJECT TO PROTECTIVE ORDER

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- 76. Neil Wilson
- 77. Jose Gabriel Zavaleta
- 78. Custodians of Records

WARNING: CONTENTS SUBJECT TO PROTECTIVE ORDER

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 2 ROBERT E. DUGDALE
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Attorneys for Plaintiff
 10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,) CR No. 10-1031(A)-AHM
)
 14 Plaintiff,) GOVERNMENT'S REDACTED WITNESS LIST
)
 15 v.)
)
 16 ENRIQUE FAUSTINO AGUILAR)
)
 17 NORIEGA, ANGELA MARIA)
)
 18 GOMEZ AGUILAR, KEITH E.)
)
 19 LINDSEY, STEVE K. LEE, and)
)
 20 LINDSEY MANUFACTURING)
)
 21 COMPANY,)
)
 22 Defendants.)
)

21 Plaintiff United States of America, by and through its
 22 attorneys of record, the United States Department of Justice,
 23 Criminal Division, Fraud Section, and the United States Attorney
 24 for the Central District of California (collectively, "the
 25 government"), hereby files its redacted witness list in the
 26 above-captioned case. At this time, the witness list includes
 27 several witnesses, especially law enforcement witnesses, who the
 28 government believes can be eliminated by way of stipulations from

1 the defense regarding things such as chain-of-custody,
2 authenticity of documents, and uncontested elements of the
3 offenses. Therefore, the government continues to reserve the
4 right to supplement or modify this witness list.

5 DATED: February 28, 2011

Respectfully submitted,

6 ANDRÉ BIROTTE JR.
United States Attorney

7
8 ROBERT E. DUGDALE
Assistant United States Attorney
Chief, Criminal Division


9
10
11 /s/

DOUGLAS M. MILLER
Assistant United States Attorney

12
13 NICOLA J. MRAZEK
JEFFREY A. GOLDBERG
Senior Trial Attorneys
14 Criminal Division, Fraud Section

1 UNITED STATES v. ENRIQUE AGUILAR, ET AL.
2 CR-10-1031(A)-AHM

3 GOVERNMENT'S WITNESS LIST

- 4 1. Erica Abarca
5 2. Angela "Angie" Aguilar
6 3. Erik Alvarez
7 4. Fernando Gonzalez Basurto
8 5. Fernando Maya Basurto
9 6. Jane Ellen Bates
10 7. Sharon Berman
11 8. Ajesh Sanmukh Bhakta
12 9. Special Agent Farrell Binder
13 10. Karyn Boutarasy
14 11. Minette Brown
15 12. Eduardo Bustani
16 13. Special Agent Stephen Caivano
17 14. Daniel Cardenas
18 15. Tina Cathcart
19 16. 
20 17. Ralph Cirigliano
21 18. Sergio Cortez
22 19. Special Agent Dane Costley
23 20. Ana Cuellar
24 21. Silvia Cuevas
25 22. Paul Erickson
26 23. Marisela Garcia

- 1 24. Michael De Ghetto
- 2 25. Special Agent Lisa Diemart
- 3 26. Special Agent Christopher Dodson
- 4 27. Special Agent Rick Esselbach
- 5 28. Manuel Gutierrez
- 6 29. [REDACTED]
- 7 30. Special Agent Jose Garcia
- 8 31. Special Agent Roman Garcia
- 9 32. Laura Garza
- 10 33. Robin Goodman
- 11 34. Andrew Harvin
- 12 35. Special Agent Tracy Hanlon
- 13 36. Special Agent Kendall Hopper
- 14 37. Abel Huitron
- 15 38. Jose Miguel Iturbe
- 16 39. Christopher Dean Joaquin
- 17 40. Special Agent Gigi Joyner
- 18 41. Bruce Killebrew
- 19 42. Bryant Kreaden
- 20 43. Connie Kwok
- 21 44. Mang Hue "Mindy" Kwok
- 22 45. [REDACTED]
- 23 46. [REDACTED]
- 24 47. Patrick McConnell
- 25 48. Jaime Palmer
- 26 49. Mariano Ornelas Lopez

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28 [REDACTED]

#17402

- 1 50. Colleen Lindsey
- 2 51. Jordan Lindsey
- 3 52. [REDACTED]
- 4 53. Sandra Macias
- 5 54. Special Agent Warren Martin
- 6 55. Special Agent Rodolfo Mendoza
- 7 56. Special Agent Charles Moon
- 8 57. Genoveva Moreno
- 9 58. Jema Moreno
- 10 59. Kelley Moreno
- 11 60. Robert Moreno
- 12 61. Special Agent Carlos Narro
- 13 62. Jaime Palmer
- 14 63. Ricardo Perusquia
- 15 64. Mario Pineda
- 16 65. Special Agent Monica Richardson
- 17 66. Stephen Schofield
- 18 67. Richard Serocki
- 19 68. Special Agent Jennifer Smith
- 20 69. Philip Spillane
- 21 70. Steve Tenison
- 22 71. Lu Tiong
- 23 72. Rochelle Torres
- 24 73. Special Agent Tandra Waldrup
- 25 74. Cristopher Wenthur
- 26 75. Special Agent Bryan Willet

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28 [REDACTED]

#17403

- 1 76. Neil Wilson
- 2 77. Jose Gabriel Zavaleta
- 3 78. Custodians of Records

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3 Chief, Criminal Division
DOUGLAS M. MILLER (SBN: 240398)
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Email: douglas.m.miller@usdoj.gov
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Attorneys for Plaintiff
10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,) CR No. 10-1031(A)-AHM
14 Plaintiff,) GOVERNMENT'S REVISED WITNESS LIST
15 v.)
16 ENRIQUE FAUSTINO AGUILAR)
17 NORIEGA, ANGELA MARIA)
18 GOMEZ AGUILAR, KEITH E.)
19 LINDSEY, STEVE K. LEE, and)
LINDSEY MANUFACTURING)
COMPANY,)
20 Defendants.)

21 Plaintiff United States of America, by and through its
22 attorneys of record, the United States Department of Justice,
23 Criminal Division, Fraud Section, and the United States Attorney
24 for the Central District of California (collectively, "the
25 government"), hereby files its redacted witness list in the
26 above-captioned case. At this time, the witness list includes
27 several witnesses, especially law enforcement witnesses, who the
28 government believes can be eliminated by way of stipulations from

1 the defense regarding things such as chain-of-custody,
2 authenticity of documents, and uncontested elements of the
3 offenses. Therefore, the government continues to reserve the
4 right to supplement or modify this witness list.

5 DATED: March 30, 2011

Respectfully submitted,

6 ANDRÉ BIROTTE JR.
United States Attorney

7
8 ROBERT E. DUGDALE
Assistant United States Attorney
Chief, Criminal Division

9
10
11 _____
/s/

DOUGLAS M. MILLER
Assistant United States Attorney

12
13 NICOLA J. MRAZEK
JEFFREY A. GOLDBERG
Senior Trial Attorneys
14 Criminal Division, Fraud Section

UNITED STATES v. ENRIQUE AGUILAR, ET AL.
CR-10-1031(A) -AHM

GOVERNMENT'S WITNESS LIST

1. Fernando Gonzalez Basurto
2. Fernando Maya Basurto
3. Jane Ellen Bates
4. Sharon Berman
5. Special Agent Farrell Binder
6. Karyn Boutarasy
7. Minette Brown
8. Eduardo Bustani
9. Tina Cathcart
10. Alma Patricia Cerdan Saavedra
11. Ralph Cirigliano
12. Sergio Cortez
13. Special Agent Dane Costley
14. Concepcion Delgado
15. Paul Erickson
16. Michael De Ghetto
17. Special Agent Christopher Dodson
18. Patricia Gomez Cepeda
19. Laura Garza
20. Robin Goodman
21. Andrew Harvin
22. Special Agent Tracy Hanlon
23. Christopher Dean Joaquin

- 1 24. Bruce Killebrew
- 2 25. Connie Kwok
- 3 26. Mang Hue "Mindy" Kwok
- 4 27. Jean-Guy Lamarche
- 5 28. Jaime Palmer
- 6 29. Special Agent Rodolfo Mendoza
- 7 30. Genoveva Moreno
- 8 31. Jema Moreno
- 9 32. Robert Moreno
- 10 33. Jaime Palmer
- 11 34. Richard Serocki
- 12 35. Philip Spillane
- 13 36. Suzanne Varco
- 14 37. Special Agent Bryan Willet
- 15 38. Jose Gabriel Zavaleta
- 16 39. Custodians of Records

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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*

April 4, 2011

TRANSMITTED VIA EMAIL (12:45 p.m.)

All Defense Counsel of Record

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

Dear Counsel:

The government intends to call the witnesses listed below during the next trial day in the above-referenced case. Please be advised that the government reserves the right to call other witnesses in addition to, or as a substitute for, the witnesses identified below.

Fernando Maya Basurto, Jr.
Michael De Ghetto
Richard Serocki
Special Agent Tandra Waldrop

Please note that Agent Waldrop will be used to assist the government in publishing to the jury certain exhibits after they have been admitted into evidence.

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



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*

April 4, 2011

REVISED

TRANSMITTED VIA EMAIL (2:45 p.m.)

All Defense Counsel of Record

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

Dear Counsel:

The government intends to call the witnesses listed below during the next trial day in the above-referenced case. Please be advised that the government reserves the right to call other witnesses in addition to, or as a substitute for, the witnesses identified below.

Fernando Maya Basurto, Jr.
Michael De Ghetto
Richard Serocki

Special Agent Tandra Waldrop
Jose Zavaleta

Please note that Agent Waldrop will be used to assist the government in publishing to the jury certain exhibits after they have been admitted into evidence.

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



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*

April 6, 2011

TRANSMITTED VIA EMAIL (4:10 p.m.)

All Defense Counsel of Record

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

Dear Counsel:

The government intends to call the witnesses listed below during the next trial day in the above-referenced case. Please be advised that the government reserves the right to call other witnesses in addition to, or as a substitute for, the witnesses identified below.

Fernando Maya Basurto, Jr.
Sharon Berman
Eduardo Bustani

Mang Hue Kwok
Special Agent Tandra Waldrop

As we informed you in writing on April 4, 2011, Agent Waldrop will be used to assist the government in publishing to the jury certain exhibits after they have been admitted into evidence.

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



U. S. Department of Justice

*United States Attorney
Central District of California*

*Douglas M. Miller
Assistant United States Attorney
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*1300 United States Courthouse
312 North Spring Street
Los Angeles, CA 90012*

April 7, 2011

TRANSMITTED VIA EMAIL (2:20 p.m.)

All Defense Counsel of Record

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

Dear Counsel:

The government intends to call the witnesses listed below during the next trial day in the above-referenced case. Please be advised that the government reserves the right to call other witnesses in addition to, or as a substitute for, the witnesses identified below.

Erica Abarca
Jane Bates
Alma Patricia Cerdan Saavedra

Laura Garza
Mang Hue Kwok

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



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*

April 11, 2011

TRANSMITTED VIA EMAIL (1:15 p.m.)

All Defense Counsel of Record

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

Dear Counsel:

The government intends to call the witnesses listed below during the next trial day in the above-referenced case. Please be advised that the government reserves the right to call other witnesses in addition to, or as a substitute for, the witnesses identified below.

Erica Abarca
Jane Bates
Eduardo Bustani

Concepcion Delgado
Laura Garza

The government also takes this opportunity to list the remaining 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' cross-examinations, and other circumstances. In addition to the individuals identified above, the government intends to call the following 18 witnesses:

1. Special Agent Farrell Binder
2. Karyn Boutarasy
3. Minette Brown
4. Eduardo Bustani
5. Sergio Cortez
6. Special Agent Dane Costley
7. Paul Erickson
8. Robin Goodman
9. Andrew Harvin
10. Bruce Killebrew
11. Genoveva Moreno

- 12. Jema Moreno
- 13. Robert Moreno
- 14. Jaime Palmer
- 15. Philip Spillane
- 16. Suzanne Varco
- 17. Special Agent Tandra Waldrop
- 18. Special Agent Bryan Willett

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



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*

April 12, 2011

TRANSMITTED VIA EMAIL (4:00 p.m.)

All Defense Counsel of Record

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

Dear Counsel:

The government intends to call the witnesses listed below during the next trial day in the above-referenced case. Please be advised that the government reserves the right to call other witnesses in addition to, or as a substitute for, the witnesses identified below.

Erica Abarca
Jane Bates
Sergio Cortez

Laura Garza
Bruce Killebrew
Jaime Palmer

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



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*

April 13, 2011

TRANSMITTED VIA EMAIL (4:00 p.m.)

All Defense Counsel of Record

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

Dear Counsel:

The government intends to call the witnesses listed below during the next trial day in the above-referenced case. Please be advised that the government reserves the right to call other witnesses in addition to, or as a substitute for, the witnesses identified below.

Erica Abarca
Sergio Cortez

Concepcion Delgado
Bruce Killebrew

The government also takes this opportunity to list the remaining 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' cross-examinations, and other circumstances. In addition to the individuals identified above, the government intends to call the following nine witnesses:

1. Special Agent Farrell Binder
2. Alma Patricia Cerdan Saavedra (possible recall)
3. Special Agent Dane Costley
4. Paul Erickson
5. Robin Goodman
6. Robert Moreno
7. Philip Spillane
8. Suzanne Varco
9. Special Agent Bryan Willett

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



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*

April 14, 2011

TRANSMITTED VIA EMAIL (4:30 p.m.)

All Defense Counsel of Record

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

Dear Counsel:

The government intends to call the witnesses listed below during the next trial day in the above-referenced case. Please be advised that the government reserves the right to call other witnesses in addition to, or as a substitute for, the witnesses identified below.

Custodian (Bank of America)	Special Agent Suzanne Rosales
Custodian (Preferred Bank)	Alma Patricia Cerdan Saavedra
Special Agent Dane Costley	

Please note that Agent Rosales will be used to assist the government in publishing to the jury certain prison telephone calls and related exhibits.

The government also takes this opportunity to list the remaining 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' cross-examinations, and other circumstances. In addition to the individuals identified above, the government intends to call the following six witnesses:

1. Special Agent Farrell Binder
2. Paul Erickson
3. Monica Lopez Guerra (chain of custody witness)
4. Philip Spillane
5. Suzanne Varco
6. Special Agent Bryan Willett

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



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*

April 18, 2011

TRANSMITTED VIA EMAIL (2:00 p.m.)

All Defense Counsel of Record

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

Dear Counsel:

The government intends to call the witnesses listed below during the next trial day in the above-referenced case. As you know, most of these witnesses will be called due to objections to the authenticity of certain exhibits. Please be advised that the government reserves the right to call other witnesses in addition to, or as a substitute for, the witnesses identified below.

Tina Cathcart	prison call authentication
Special Agent Dane Costley	summary witness
Special Agent Jose Garcia	prison call authentication
Special Agent Susan Guernsey	search chain of custody
Monica Lopez Guerra	search chain of custody
Special Agent Tracy Hanlon	search chain of custody
Special Agent Charles Moon	search chain of custody
Shonna Wilson	"A"-file authentication

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



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*

April 19, 2011

TRANSMITTED VIA EMAIL (4:00 p.m.)

All Defense Counsel of Record

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

Dear Counsel:

The government intends to call the witnesses listed below during the next trial day in the above-referenced case. As you know, most of these witnesses will be called due to objections to the authenticity of certain exhibits. Please be advised that the government reserves the right to call other witnesses in addition to, or as a substitute for, the witnesses identified below.

April Buell	border crossing authentication
Special Agent Dane Costley	summary witness
Special Agent Susan Guernsey	search chain of custody
Monica Lopez Guerra	search chain of custody
Special Agent Tracy Hanlon	search chain of custody
Special Agent Charles Moon	search chain of custody
Shonna Wilson	"A"-file authentication

Very truly yours,

ANDRÉ BIROTTE JR.
United States Attorney

 /s/

DOUGLAS M. MILLER
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April 24, 2011

TRANSMITTED VIA EMAIL (5:00 p.m.)

All Defense Counsel of Record

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

Dear Counsel:

Please be advised that barring any unforeseen circumstances, the government does not intend to call any other witnesses aside from Special Agent Dane Costley. Accordingly, the government renews its request for the production of any defense witness statements, related discovery, and any other available information concerning defense witnesses.

More than two weeks ago, on April 6, 2011 (see attached), the defense identified eight potential witnesses, including Donald Dodds and Special Agent Susan Guernsey. Since then, the defense has represented that it will not be calling Dodds. In addition, the government assumes that because Agent Guernsey has been — and will continue to be — examined by the defense during the government's case-in-chief, the defense no longer plans to call her during any defense case. Kindly inform the government sometime tomorrow (1) as to whether you still intend to call Agent Guernsey after the government rests (and for what purpose) and (2) what other witnesses, if any, you plan to call (and for what purpose). Lastly, the government looks forward to receiving the Ronald Durkin documents that the Court recently ordered the defense to disclose.

Very truly yours,

ANDRÉ BIROTTE JR.
United States Attorney

/s/

DOUGLAS M. MILLER
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Attachment