



BALAREZO LAW

CRIMINAL DEFENSE

September 19, 2018

Via ECF

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Assistant United States Attorneys
United States Attorney's Office for the
Eastern District New York
271 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Joaquín Guzmán Loera*
Case No. 09-CR-0466(S-4)(BMC)

Counsel:

I write in reference to certain issues that may need to be addressed at the status conference scheduled for September 20.

On September 7, 2018, I wrote you requesting more information pertaining to your § 3500 material production. I requested (a) that you produce unredacted copies of the § 3500 material; and (b) that you produce final transcripts of 7 specific recordings. To date you have not responded to my letter. I ask that you respond before the status conference tomorrow.

Today, you filed a letter (Doc. 320) purporting to provide information pertaining to Violation 85 pursuant to the Court's Order of September 7, 2018 (Doc. 303). In that Order, the Court stated, "When the government makes a production containing § 3500 evidence relating to Violation 85, that production should also contain – to the best of the government's ability – a cross-reference to the specific line item on the bill of particulars for which the government intends to offer that evidence at trial." (Doc. 303, at 16 & n.6). Your letter (Doc. 320) merely states that information pertaining to Violation 85 is contained in the § 3500 material for a former law enforcement officer. It does not contain any "cross-reference to the specific line item on the bill of particulars." In fact, your letter does not provide any useful information. I ask that you provide the information pursuant to the Court's Order before the status conference tomorrow.

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Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Eduardo Balarezo', with a long, sweeping flourish extending to the right.

A. Eduardo Balarezo

cc: the parties via ECF