

Exhibit B



United States Department of Justice

United States Attorney's Office Central District of California

████████████████████
Assistant United States Attorneys
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Ronald Reagan Federal Bldg./U.S. Dist.
Courthouse
411 W. 4th St., Suite 8000
Santa Ana, California 92701

July 28, 2025

Marilyn Bednarski
975 East Green Street
Pasadena, California 91106

Re: United States v. David Huerta

Dear Counsel:

A. Current Discovery Disclosure

Pursuant to your discovery request, the government makes available the following discovery (PROD_004):

- Videos originally produced as HUERTA_00000357 (HUERTA_00000403-HUERTA_00000608)
- Additional photos and videos (HUERTA_00000609-HUERTA_00000659)

On July 17, 2025, the government produced the following (PROD_003):

- Search warrants (HUERTA_00000358-HUERTA_00000402)

On July 2, 2025, the government produced the following (PROD_002):

HUERTA_00000001	HUERTA_00000025	Huerta Criminal History
HUERTA_00000026	HUERTA_00000075	HIS Reports
HUERTA_00000076	HUERTA_00000159	Photos
HUERTA_00000160	HUERTA_00000235	Agent Text Messages
HUERTA_00000236	HUERTA_00000237	Arrest Text Messages

HUERTA_00000238	HUERTA_00000354	Huerta Text Messages
HUERTA_00000355	HUERTA_00000356	Sandra Diaz Text Messages with Huerta
HUERTA_00000357	HUERTA_00000357	Videos

This discovery is cumulative to the discovery produced earlier, but this version includes Bates numbers.

The government makes available for your inspection any item of evidence referred in the reports, as well as any other evidence seized from your client, seized during the investigation, and/or which the government intends to offer in its case-in-chief.

B. Jencks

The government will produce to you any additional Jencks material—including any relevant grand jury transcripts, assuming a Rule 6(e) order has been issued—one week before trial if you agree to the production of reciprocal Jencks material at that time or affirmatively represent that you have no Jencks material to produce. Please inform me whether you disagree with such an arrangement.

The enclosed materials and any future discovery provided to you that may exceed the scope of discovery mandated by the Federal Rules of Criminal Procedure, federal statute, or relevant case law are provided voluntarily and solely as a matter of discretion. By producing such materials to you, the government does not waive its right to object to any future discovery requests beyond the ambit of its legal obligations.

C. Reciprocal Discovery

With this letter the government requests all reciprocal discovery to which it is entitled under Rules 16(b) and 26.2 of the Federal Rules of Criminal Procedure. The government also requests notice of any intention of your client to rely on an entrapment defense, or a defense involving mental condition or duress, and/or an alibi defense. Pursuant to Federal Rule of Criminal Procedure 12.1, the dates, times, and places of the charged offense are detailed within the documents included within the discovery. Please contact me immediately if you believe that this notice is insufficient.

Please contact me if you believe any of the notices listed above are insufficient, if you have any questions, or would like to further discuss any of the matters raised above.

Very truly yours,

Mark Takla

MARK TAKLA
Assistant United States Attorney