

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-80116-CR-CANNON/McCabe**

**UNITED STATES OF AMERICA** )  
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 )  
 )  
 )  
 v. )  
 )  
 )  
 )  
 **RYAN WESLEY ROUTH,** )  
 )  
 )  
 **Defendant.** )  
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**GOVERNMENT'S FIRST RESPONSE TO  
THE STANDING DISCOVERY ORDER**

The United States hereby files this First Response to the Standing Discovery Order. This response also complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16, and outlines the discovery materials the Government will produce to defense counsel of record upon entry of the requested protective order ([ECF No. 43]).

- A.
  - 1. The Government will produce a copy of any written statement made by the defendant.  
  
The Government will produce a copy of any audio and/or video recording of statements made by the defendant.
  - 2. The Government will produce all reports containing the substance of any oral statement made by the defendant before or after arrest in response to interrogation by any person then known to the defendant to be a government agent.
  - 3. No defendant testified before the Grand Jury.
  - 4. The defendant's prior criminal record is attached.

5. Books, papers, documents, data, photographs, tangible objects, buildings or places, within the government's possession, custody or control, which are material to the preparation of the defendant's defense, or which the government intends to use as evidence at trial to prove its case in chief, or which were obtained from or belong to the defendant, may be inspected at a mutually convenient time at: the Office of the United States Attorney, 500 South Australian Avenue, Suite 401, West Palm Beach, Florida. Please call the undersigned to set up a date and time that is convenient to both parties.

Additionally, upon entry of a protective order, the Government will produce to the defense, on a portable hard drive previously provided by defense counsel to the Government, the following materials, which are numbered and itemized as follows:

<b>FOLDER NO.</b>	<b>DESCRIPTION</b>	<b>BATES Nos.</b>
01	NCIC	Gov000001-9 Gov000010-15
02	Search Warrants	Gov000016-400
03	FBI Reports	Gov000401-777
04	Body Camera Footage	Gov000778-1339
05	Photographs > <sup>1</sup> 01 Ryan Wesley Routh	Gov001340-1414
05	Photographs > 02 Crime Scene	Gov001415-2138
05	Photographs > 03 Witness Photographs	Gov002139-2141
05	Photographic Evidence > 04 Nissan Xterra	Gov002142-2626
05	Photographs > 05 Vehicle Tires	Gov002627-2666
05	Photographs > 06 NC Box	Gov002667-2863
05	Photographs > 07 NC Residence	Gov002864-3528
05	Photographs > 08 SKS Rifle	Gov003529-3530

<sup>1</sup> ">" denotes a subfolder.

<b>FOLDER NO.</b>	<b>DESCRIPTION</b>	<b>BATES Nos.</b>
06	License Plate Reader Data > 01 Flock > 01 Lookup Results	Gov003531-3549
06	License Plate Reader Data > 01 Flock > 02 Search Results	Gov003550-3576
06	License Plate Reader Data > 01 Flock	Gov003577-3578
06	License Plate Reader Data > 02 Searches	Gov003579-3608
06	License Plate Reader Data > 03 Vigilant	Gov003609-3701
07	Interstate Nexus	Gov003702-3703
08	Forms	Gov003704-3707
09	Aerial Footage	Gov003708-3715
10	Air Travel Records > 01 American Airlines	Gov003716-3788
10	Air Travel Records > 02 Alaska Airlines	Gov003789-3808
10	Air Travel Records > 03 Delta Airlines	Gov003809-3824
10	Air Travel Records > 04 Southwest Airlines	Gov003825-3846
11	Cellular Telephone Records > 01 AT&T > 4171835 3379661	Gov003847-4037
11	Cellular Telephone Records > 01 AT&T > 02 4171835 3379671	Gov004038
11	Cellular Telephone Records > 01 AT&T	Gov004039
11	Cellular Telephone Records > 02 T-Mobile	Gov004040-4074
12	Prior Convictions	Gov004075-4112

Please note that the Government will be disclosing the above items in their native format as well as in PDF format for ease of review. The above material constitutes approximately 250 gigabytes of data.

In addition to the above-referenced items, the following electronic devices are available at the Federal Bureau of Investigation's Miami Field Office

for inspection by the defense team at a mutually convenient time:

<b>ITEM</b>	<b>DEVICE TYPE</b>	<b>DEVICE DESCRIPTION</b>
89B-MM3974142-SW 7	Internet Activity	Twitter/ X Corp Search Warrant Return
	Cell Phone	Galaxy A15 5G SM-A156U S/N: R5CX505PDKP
1B187	Cell Phone	Black Samsung Phone; IMEI: 356556771217834
1B185	Cell Phone	"BLU Smartphones;" IMEI: 356197684895554
1B182	Laptop/Tablet Computer	Blue HP Laptop; S/N: 5CD3017HX7
1B165	Cell Phone	Samsung Galaxy Note 9; IMEI: 358620091036239
1B153	Loose Media	5 USBs and 1 Sandisk Card
1B152	Loose Media	LACIE HD; S/N: 14291207261186QR
1B151	Loose Media	Seagate HD; S/N: NA02E315
1B150	Loose Media	IOMEGA HD; S/N: XHAB261239
1B146	Loose Media	WD Blue Solid State Drive; S/N: 204301A001F9 1TB
1B144	Laptop/Tablet Computer	Lenova Ideapad Model 81FB ; S/N: D05E930
1B143	Computer	Sony Personal Computer Model SVE151D11L
1B140	Loose Media	My Passport HD; S/N: WX82D90KKD6J
1B138	Loose Media	Seagate Backup Plus Portable HD; S/N: NABA091L

1B137	Laptop/Tablet Computer	Republic of Gamers Laptop; S/N: L89RKD003571349
1B135	Cell Phone	Samsung Galaxy Note 9 SM-N960U1; S/N: RF8K905MLLW
1B76	Cell Phone	TCL Verizon Black Cell Phone; IMEI: 355952112504223
1B75	Cell Phone	Motorolla Black Cellphone, Model#: XT2005-1PP, IMEI: 352176104313798
1B74	Cell Phone	AT&T Silver Cellphone S/N: LT25H426271WJB2111200096791
1B73	Cell Phone	AT&T Silver Cellphone S/N: LT25H426271WJB2108200127752
1B69	Loose Media	Sandisk SD - 2GB
1B68	Loose Media	SanDisk SD - 2GB
1B67	Laptop	Toshiba Laptop S/N 1C123144R
1B66	Loose Media	Olympus xD picture card 1 GB
1B65	Loose Media	4GB Maxwell SDCard
1B64	Loose Media	SanDisk SD 2 GB
1B63	Loose Media	Black Seagate Backup Plus Portable Drive S/N NA9V01G3
1B62	Cell Phone	Black LG AT&T Phone
1B61	Tablet	Black Amazon Tablet Model SR043KL
1B60	Cell Phone	Black LG Phone
1B59	Cell Phone	Gray ZTE Phone

1B58	Cell Phone	Gray Alcatel Cricket Phone
1B57	Cell Phone	Black Samsung Phone IMEI 354963321095011
1B56	Cell Phone	Black Nokia
1B55	Cell Phone	Blue phone with Victoria's Secret card holder on back
1B54	Cell Phone	Black Kyocera Cricket Phone
1B53	Cell Phone	Gray Alcatel Cricket / Alcatel Streak
1B52	Cell Phone	Gray ZTE Phone IMEI 358525035261076
1B51	Cell Phone	Black HTC MyTouch Phone 4G Slide
1B50	Cell Phone	Gray Alcatel Cricket Phone
1B49	Cell Phone	LG GSM C410 Xpression 2
1B46	Loose Media	SanDisk MicroSD 32 MB
1B45	Loose Media	AdventistHealth Castle CD
1B44	Tablet	iPad Air S/N DMPRW7BYG5YL
1B43	Cell Phone	iPhone 6 IMEI 359306063157778
1B42	Tablet	iPad 6 S/N DMPX92LWJMXK
1B41	Desktop	Gateway Desktop - Serial Number XBG8631004740
1B40	Desktop	Dell Desktop - Serial Number C2NQ511
1B39	Computer	Dell OptiFlex 3050 Service Tag 895X2K2
1B37	Tablet	iPad 16GB - Serial DMPGT84QDFHW

1B36	Laptop	ASUS Laptop - Model X205T
1B35	Loose Media	Gray USB
1B34	Loose Media	Fedex Office 16GB USB
1B33	Loose Media	SanDisk USB 8 GB
1B31	Loose Media	APacer 8GH MicroSD
1B30	Loose Media	SimpleTech USB
1B26	Laptop	HP Model 17-by1053dx S/N 5CG938BY3C
1B24	Cell Phone	Pink iPhone
1B23	Loose Media	Fedex Office 16GB USB MicroSD
1B20	Desktop	Dell XPS8930 Service Tag: HAQ9CP2
1B17	Cell Phone	Blu Tracfone S/N 1080016023119675
1B15	Cell Phone	Orbic
1B14	Cell Phone	Verizon Motorola
1B3	Cell Phone	TLC Flip Phone
1B2	Cell Phone	Model U319AA Calypso
1B1	Cell Phone	Samsung IMEI 351404590575402
TBD	Action Camera	Akaso Brave7
TBD	Cell Phone	Samsung Galaxy A01
TBD	Cell Phone	Grey Apple iPhone 9890

The above-referenced electronic information constitutes approximately 5.5 terabytes of data.

The attachments to this discovery response are not necessarily copies of all the books, papers, documents, data, etc., that the Government may intend to introduce at trial.

6. Numerous scientific tests were conducted and continue to be conducted in connection with this case, including fingerprint and DNA analyses of several items of evidence including the firearm and ammunition seized from the crime scene. In addition, a firearms expert examined the firearm seized from the crime scene to determine if the weapon and ammunition were manufactured outside the state of Florida; and examination of the plates

seized from inside a bag and backpack at the crime scene to determine if the plates are able to stop bullets fired by weapons used by U.S. Secret Service agents. The Government will describe the tests conducted and the results of those tests in expert disclosures to be made with Local Rule 88.10(o).

- B. DEMAND FOR RECIPROCAL DISCOVERY: Pursuant to the Standing Discovery Order, the United States requests the disclosure and production of materials listed in Section (b) of Local Rule 88.10. This request is also made pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure. Additionally, pursuant to Rule 16(b) and Local Rule 88.10(o), the Government requests reciprocal expert discovery from the defendant.
- C. The government will disclose any information or material which may be favorable on the issues of guilt or punishment within the scope of Brady v. Maryland, 373 U.S. 83 (1963), and United States v. Agurs, 427 U.S. 97 (1976).
- D. The government will disclose any payments, promises of immunity, leniency, preferential treatment, or other inducements made to prospective government witnesses, within the scope of Giglio v. United States, 405 U.S. 150 (1972), or Napue v. Illinois, 360 U.S. 264 (1959).
- E. The government will disclose any prior convictions of any alleged co-conspirator, accomplice, or informant who will testify for the government at trial.
- F. As disclosed during the pretrial detention hearing, the defendant was identified by two witnesses after the commission of the charged offense.
- G. The government has advised its agents and officers involved in this case to preserve all rough notes.
- H. The government will timely advise the defendant of its intent, if any, to introduce at trial extrinsic act evidence pursuant to F.R.E. 404(b). Pursuant to Local Rule 88.10, the notice will be provided regardless of whether the evidence may be used in the case-in-chief, for impeachment or possible rebuttal, and will include the general nature of the evidence.

You are hereby on notice that all evidence made available to you for inspection, as well as all statements disclosed herein or in any future discovery letter, may be offered in the trial of this cause, under F.R.E. 404(b) or otherwise (including the inextricably intertwined doctrine).

In addition, the government may introduce under Rule 404(b) evidence



underlying the defendant's past criminal activity that has resulted in arrests and/or convictions and which is summarized in the attached court documents.

- I. The defendant is not an aggrieved person, as defined in Title 18, United States Code, Section 2510(11), of any relevant electronic surveillance that was authorized pursuant to 18 U.S.C. §2516 and 18 U.S.C §2518 and that has been unsealed in accordance with 18 U.S.C §2518.
- J. The government has ordered to be transcribed the Grand Jury testimony of all witnesses who will testify for the government at the trial of this cause.
- K. No contraband is involved in this indictment.
- L. If you wish to inspect the Nissan Xterra used in the commission of the offense charged, please contact the undersigned.

Security requirements mandate strict compliance with the procedures established for the granting of access for inspection of seized vessels, aircraft and vehicles.

Accordingly, the United States Attorney's Office cannot process last-minute requests for inspection. In order to meet security requirements, all requests to inspect seized vessels, aircraft or automobiles must be received by the AUSA handling the case on or before fifteen (15) days from the date of this Response to the Standing Discovery Order.

If you anticipate that this deadline may create a problem for you or your client, please promptly send written notice to the appropriate AUSA.

- M. A latent fingerprint found on the SKS rifle seized from the crime scene on September 15, 2024, has been identified as that of the defendant. A copy of the latent fingerprint will be made available upon request to the undersigned.
- N. The government will make every possible effort in good faith to stipulate to all facts or points of law the truth and existence of which is not contested and the early resolution of which will expedite trial. These stipulations will be discussed at the discovery conference.
  - 1. The firearm seized from the defendant at the time of arrest is a "firearm" as that term is defined in Title 18, United States Code, Section 921(a)(3), that is, it is a weapon which is designed to, or may readily be converted to, expel a

projectile by the action of an explosive.

2. That firearm was manufactured outside the state of Florida and had moved in interstate commerce before the defendant possessed it.

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, Brady, Giglio, Napue, and the obligation to assure a fair trial.

[In addition to the request made above by the government pursuant to the Standing Discovery Order, Local Rule 88.10(b), and Rule 16(b) of the Federal Rules of Criminal Procedure, in accordance with Rule 12.1 of the Federal Rules of Criminal Procedure, the government hereby demands Notice of Alibi defense; the approximate time, date, and place of the offense as set forth in the Indictment.

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

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cc: Special Agent Christian Hull,  
FBI

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 17, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will deliver notices of electronic filing to all counsel of record.

*Mark Dispoto*  
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MARK DISPOTO  
Assistant United States Attorney