



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SK/RCH/EMR/PP/MED  
F. #2019R00927

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 26, 2022

By FedEx

César de Castro, Esq.  
The Law Firm of César de Castro, P.C.  
The District  
111 Fulton Street - 602  
New York, New York 10038

Re: United States v. Genaro Garcia Luna  
Criminal Docket No. 19-576 (BMC)

Dear Counsel:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. Please note the enclosed discovery contains Protected Material and should be handled consistently with the Protective Order. See Dkt. No. 19. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

Enclosed please find:

0001165339-0001165922	Records related to the shipment of narcotics into the United States through shell companies
0001165923-0001166148	Select paystubs of the defendant
0001166149-0001166373	Records related to a co-conspirator and the seizure of narcotics in Queens, New York on December 18, 2019
0001166374-0001166374	A photograph of the defendant's co-conspirators in October 2008

In addition, pursuant to both Rule 16 and 18 U.S.C. § 3500, please find enclosed six cell phones seized from a co-conspirator of the defendant on or about December 18, 2019, in Queens, New York, enclosed in a folder Bates-numbered 0001166375. The government will provide notice sufficiently in advance of trial if it intends to introduce any portion of these electronic devices at trial.<sup>1</sup>

II. Expert Notice

The government hereby provides notice that it intends to call Lyndell Griffin, a Digital Forensic Examiner with the Drug Enforcement Administration, at trial. Previously, the government informed the defendant that David Roose was expected to testify regarding his forensic analysis of the electronic devices and storage media obtained in connection with this investigation, including the imaging, extraction, and identification of data from the devices. Mr. Griffin is a substitute witness for Mr. Roose. The government still expects that this testimony will constitute fact testimony but provides this notice out of an abundance of caution. Mr. Griffin's qualifications are further set forth in his curriculum vitae, which is enclosed as 3500-LG-1.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/  
Saritha Komatireddy  
Ryan C. Harris  
Erin M. Reid  
Philip Pilmar  
Marietou E. Diouf  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosures

cc: Clerk of Court (BMC) (via ECF) (without enclosures)

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<sup>1</sup> The phone marked 1B118 is not believed to belong to the witness.