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U.S. Department of Justice

United States Attorney Eastern District of New York

RCH/EMR/HDM/PP/MD F. #2019R00927

271 Cadman Plaza East Brooklyn, New York 11201

September 29, 2021

By FedEx

Cesar DeCastro, Esq. 7 World Trade Center, 34th Floor New York, NY 10007

> 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. <u>See</u> Dkt. No. 19. The government also requests reciprocal discovery from the defendant.

I. <u>The Government's Discovery</u>

Enclosed please find:

- Documents provided by the Mexican government, Bates-numbered 0001061339-0001066796;
- Statements of the defendant, Bates-numbered 0001061336-0001061338;
- U.S. State Department records, designated as Protected Material and Bates-numbered 0001061160-0001061335;
- A photobook, designated as Protected Material and Bates-numbered 0001066797-0001066861; and
- Bank of America records, Bates-numbered 0001066862-0001068112.

Please be advised that this production contains foreign records of regularly conducted business activities obtained from the Mexican government via Mutual Legal Assistance Treaty Requests that the government intends to offer at trial pursuant to 18 U.S.C. § 3505.

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,

JACQUELYN M. KASULIS Acting United States Attorney

By:

<u>/s/</u>

Ryan C. Harris Erin M. Reid Hiral D. Mehta Philip Pilmar Marietou Diouf Assistant U.S. Attorneys (718) 254-7000

Enclosures

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