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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

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UNITED STATES OF AMERICA,  
Plaintiff,  
  
v.  
  
LEV ASLAN DERMEN  
  
Defendant.

**NOTICE RE NEWLY DISCLOSED  
*BRADY/GIGLIO* EVIDENCE**

Case No. 2:18-cr-00365-JNP-BCW  
Honorable Jill N. Parrish

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On June 9, 2022, the government produced its sixty-seventh (67) volume of discovery in this matter. The new discovery consists of approximately 15,000 pages. These documents include new *Brady/Giglio* disclosures regarding the government's trial witness, Zubair Kazi with respect to a newly disclosed ongoing OIG investigation into claims made by Mr. Kazi regarding his unscrupulous dealings with federal and local Los Angeles law enforcement agents for access to luxury items seized by the government in exchange for his ongoing cooperation and testimony in this matter. This category of discovery includes a lengthy interview of Mr. Kazi regarding his claims by OIG investigators that actually occurred during Mr. Dermen's trial which was not disclosed by Mr. Kazi during his trial testimony nor was it disclosed to defense counsel by the government. In recent email exchanges between defense counsel and the government, they deny

knowing about this interview during the trial. Defense counsel has not completed its review of the 15,000 pages of new discovery and will require additional time to not only complete the review but to discuss the new discovery with the defendant Mr. Dermen, who is inconsolable as he grieves his father's passing this weekend, who Mr. Dermen was unable to see before he died. Inevitably, the newly disclosed discovery as to Zubair Kazi will be the subject of Mr. Dermen's impending motion for new trial. Defense counsel is providing this notice to the Court simply to inform it that Mr. Dermen does intend to continue to pursue his motion for new trial upon defense counsel's completion of its review of the new discovery, and in hopes that this Court will see it appropriate to admonish the government to continue to produce new discovery immediately and expeditiously as it comes into possession of these items, to prevent further delays, setbacks, and prejudice to Mr. Dermen and his defense.

Dated: July 5, 2022.

Respectfully submitted,

/s/ Mark J. Geragos  
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**CERTIFICATE OF SERVICE**

I hereby certify that I filed a true and correct copy of the foregoing, on the case styled *United States of America v. Lev Aslan Dermen*, this 5th day of July, 2022, with the Clerk of the Court using CM/ECF. I have filed the foregoing document under seal and as an ex-parte filing before this court.

*/s/ Mark J. Geragos* \_\_\_\_\_