

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 12-60049-CR-ROSENBAUM

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
-v-)	
)	
ROGERIO CHAVES SCOTTON,)	
)	
Defendant.)	West Palm Beach, Florida
)	October 23, 2013
)	2:57 p.m.

TRANSCRIPT OF MOTION HEARING
BEFORE THE HONORABLE WILLIAM MATTHEWMAN
U.S. MAGISTRATE JUDGE

Appearances:

For the Government:	BERTHA MITRANI Assistant United States Attorney 500 East Broward Boulevard Fort Lauderdale, Florida 33301
---------------------	--

For the Defendant:	Pro se
--------------------	--------

Standby Counsel:	JASON W. KREISS, ESQ. 1824 SE 4th Avenue Fort Lauderdale, Florida 33316
------------------	---

Reporter:	Karl Shires, RPR, FCRR
(561) 514-3728	Official Court Reporter 701 Clematis Street, Suite 258 West Palm Beach, Florida 33401

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

WITNESS	PAGE
ROY VANBRUNT, DEFENDANT'S WITNESS, SWORN	61
DIRECT EXAMINATION BY THE COURT	62
CROSS-EXAMINATION BY THE DEFENDANT	64
EXHIBITS	RECEIVED
COURT'S EXHIBIT(S) 1 AND 2	32
DEFENDANT'S EXHIBIT(S) 1 AND 2	56

1 (Call to Order of the Court.)

2 THE COURT: Good afternoon, everybody.

3 Let's go ahead and call the case.

4 THE COURTROOM DEPUTY: Calling United States of
5 America versus Rogerio Chaves Scotton, Case Number
6 12-60049-CR-Rosenbaum/Matthewman, second superseding.

7 THE COURT: All right. let's go ahead and have
8 appearances.

9 MS. MITRANI: Good afternoon, Your Honor. Bertha
10 Mitrani on behalf of the United States. With me at counsel
11 table is Special Agent Roy VanBrunt.

12 THE COURT: Good afternoon to both of you.

13 And Mr. Scotton is present here in court pro se.

14 Good afternoon, Mr. Scotton.

15 THE DEFENDANT: Good afternoon, sir.

16 THE COURT: And we also have who else here?

17 ATTORNEY2: Good afternoon, Your Honor. Jason Kreiss
18 I'm stand-by counsel for Mr. Scotton.

19 THE COURT: All right. Good afternoon, Mr. Kreiss.

20 So there's several matters which have been set down
21 today, and we'll go ahead and proceed on those at this time.

22 Now, the first motion that we can deal with would be
23 the motion for authorization to fund investigator at Docket
24 Entry No. 170. That was filed publicly, not under seal or ex
25 parte. Is that correct, Mr. Scotton?

1 THE DEFENDANT: Yes, sir.

2 THE COURT: Okay. So you have two options. You can
3 explain to the Court now why you need an investigator, you can
4 also do it, if you would like to do it, ex parte and seal it
5 after the other hearings are done. But if you believe you can
6 do it publicly without compromising your case, you can tell
7 me.now.

8 THE DEFENDANT: Better do it sealed.

9 THE COURT: All right. We'll put off No. 170 until
10 the end of the other hearings are done.

11 The next motion in this matter is the motion to
12 compel, turnover of Brady material and Kyles files. It is
13 Document No. 185, and the response filed by the government is
14 at 189.

15 Mr. Scotton, do you want to go ahead and tell me what
16 the motion to compel, turnover of Brady material and Kyles
17 files, what you're seeking? I read the motion and the
18 response, but if there's anything that you would like to add.

19 THE DEFENDANT: Just give me a moment to get my
20 paperwork together, Your Honor.

21 THE COURT: That's fine.

22 MS. MITRANI: While defendant gets hit paperwork
23 together, I want to say we handed Mr. Scotton Docket Entry 187,
24 188, and 189 just a few minutes ago.

25 THE COURT: All right. 187, 188 and 189. Thank you.

1 THE DEFENDANT: Your Honor, at this moment I would
2 also like to invoke the rule of -- I don't know how even to
3 pronounce this -- sequestration for witnesses in the courtroom.

4 THE COURT: Well, the Brady motion wouldn't require
5 any witnesses I don't believe. What witnesses would you need
6 on the Brady motion, the Docket Entry No. 185?

7 THE DEFENDANT: Probably I have to call the agent on
8 the case, VanBrunt, to the stand.

9 THE COURT: In an abundance of caution, I will invoke
10 the rule and ask the agent to step outside. Agent VanBrunt is
11 the case agent?

12 MS. MITRANI: Yes, Your Honor.

13 THE COURT: There is an exception for him to remain
14 in. He is the case agent on the case.

15 Is there anybody else that would be potentially a
16 witness?

17 MS. MITRANI: No, Your Honor. The other two
18 individuals are assisting us in the case but they're not
19 witnesses with knowledge.

20 THE COURT: All right. So on this Brady motion,
21 Mr. Scotton, on the Brady motion you are asking for destroyed
22 evidence, missing photographs, and other matters.

23 Can you explain to me what it is that you're seeking
24 and why you're making these allegations?

25 THE DEFENDANT: Well, Your Honor, I'm going to have

1 one witness this is going to have to come testify if we have an
2 evidentiary hearing.

3 THE COURT: About what?

4 THE DEFENDANT: Piece of the video the VanBrunt tried
5 to present to court has been missing. Specifically things that
6 I remember, I recall, people that have testified on the
7 interview.

8 THE COURT: You're going to need to speak slower and
9 into the microphone so the court reporter can get this down.

10 Let's try and simplify things. You filed a motion to
11 compel, turnover of Brady material and Kyles files.

12 Let's go through the first paragraph. Number one,
13 you're seeking the destroyed evidence, including the missing
14 portions of the strepitous video recorded by Agent VanBrunt and
15 other evidence.

16 Okay. Now, that request that you're making there for
17 this alleged destroyed evidence, the government has responded
18 they don't have any such destroyed evidence.

19 So what is it that you are seeking the Court to
20 require the government to turn over to you?

21 THE DEFENDANT: During the hearing proceeding in front
22 of Judge Rosendale (sic) I was need to be able to show
23 Rosendale that the video has been corrupt, the video has been
24 edited. It's a piece of the video is missing.

25 THE COURT: What witness would you chose to call on

1 that?

2 THE DEFENDANT: I don't prefer not to say right now,
3 Your Honor, because every single time I have call in or my
4 family call someone to testify the next thing I know they been
5 intimidated by FBI agents.

6 THE COURT: Do you have anything else to add on
7 request number one, the alleged destroyed evidence?

8 THE DEFENDANT: No. It's just a piece of the file.
9 You know, as I say, be missing. So I need the other the piece
10 of the file that's missing.

11 As a matter of fact, I remember piece of the file when
12 I -- the agent pretend to be a DHL employee asked me questions,
13 and I told him that I was Brazil USA Export/Import company to
14 ship my packets. We already know that. So why the piece is
15 not in the video any more then?

16 THE COURT: All right. Number two is the missing
17 photographs of defendant's home removed from his files in the
18 courthouse in Broward County.

19 What support do you have for that allegation?

20 THE DEFENDANT: Your Honor, there's a lot of pictures
21 that has been showed during my pretrial detention in front of
22 Magistrate Snow. Those pictures are gone. There's a lot of
23 personal pictures.

24 THE COURT: What evidence do you have to support your
25 allegation that the government took the photographs from your

1 file?

2 THE DEFENDANT: I got three inmates sitting in Broward
3 County Jail right now that saw someone went inside the cell
4 block in the corridor room messing with my files over there.
5 Because they left off my files inside of the cell block in the
6 courthouse.

7 THE COURT: Judge Rosenbaum allowed that so you can
8 review your discovery yourself, right?

9 THE DEFENDANT: Well, I remember the last time you
10 order Stuart to come to FDC and return to me all of my files,
11 not drop off at the courthouse.

12 THE COURT: Well, but the files were at the courthouse
13 because Judge Rosenbaum had left them there so that you could
14 can each day to review your discovery; isn't that true?

15 THE DEFENDANT: Your Honor, I understand. But I have
16 a copy of the order here when you told Stuart specifically.

17 THE COURT: We're not talking about Mr. Adelstein.
18 He's already been discharged.

19 What we're talking about is this specific request, and
20 you're alleging that are there are missing photographs of
21 defendant's home removed from his files in the courthouse in
22 Broward County. And all I'm asking you is to tell me how it is
23 that you're saying that the government, whether an agent or
24 anybody else, took photographs from your files at the Broward
25 County courthouse?

1 THE DEFENDANT: Inmates have seen people go inside
2 those box and stuff, going through the box.

3 THE COURT: Okay. Inmates.

4 THE DEFENDANT: Out of the blue, out of the blue
5 everything is missing, all of the things that my family has
6 provided to the lawyers. As a matter of fact, a video of a
7 confession and a letter of confession of the person that has
8 committed this fraud. The letter is gone, Your Honor.

9 Judge Rosenbaum has a copy of the letter. Where is
10 the original letter that has been handed to my Abreu, my second
11 lawyer? Abreu has give the letter to Chantel. Chantel has
12 given that to Stuart. So the letter seems to vanish out of the
13 box. A lot of my files personal pictures, receipts, everything
14 that has handed to the lawyer it is not any more.

15 On the beginning of this case protestor say that they
16 have four box of evidence. Well, they have only two. Where
17 are the other two boxes, Your Honor? Because two box has
18 presented to me, and one has some of them, of my files. So
19 where is all of the other boxes then? Why all my files have
20 been disappear?

21 And every single time they pull me from one place to
22 another things seem to disappear. So I try to get prepared for
23 trial here, but, you know, I don't see how this is going to
24 happen.

25 THE COURT: All right. Paragraph No. 3, you asked for

1 the pretrial report referred to by ICE that alleges defendant
2 is appealing his I-485 immigration case.

3 What pretrial report are you seeking? Don't you have
4 that already?

5 THE DEFENDANT: I just receive a couple of days ago.

6 THE COURT: So number three you have; is that right?

7 THE DEFENDANT: The detention order report.

8 THE COURT: The immigration detention order.

9 THE DEFENDANT: No. I got -- what I have is the
10 detention order from when Judge Snow decide to not give me
11 bond.

12 THE COURT: But I'm asking you about -- in Paragraph 3
13 you're asking for a retrial report referred to by ICE that
14 alleges the defendant is appealing his I-485 immigration case.

15 Don't you have that?

16 THE DEFENDANT: No.

17 THE COURT: Wasn't that attached to the government's
18 response?

19 THE DEFENDANT: Your Honor, how can I be appealing my
20 case when my case was not denied at that point?

21 THE COURT: Let me ask, this number three, do you have
22 any idea what this is all about, Ms. Mitrani?

23 MS. MITRANI: Yes and no. I can tell the Court
24 procedurally is that the defendant applied to adjust his status
25 of that of a -- to get a green card. Lawful permanent

1 resident. And he filed an I-485 application in conjunction
2 with that.

3 It's a long story. At the time of his detention
4 hearing the denial was not formal. We thought it was formal.
5 We proffered to the Court that it had been denied. We showed
6 the defendant or his lawyer a draft, working copy of that
7 denial. Turns out for reasons that are unclear it hadn't been
8 sent out as of March 29, 2012. On March 31 they sent out the
9 formal denial of his I-485 application. And at Docket Entry 28
10 the government filed that in open court because the defendant
11 appealed his detention. The defendant then attempted to appeal
12 that denial of that detention, and that appeal has been denied.
13 And we've attached a copy of that denial of the appeal to our
14 submission which is Docket Entry 189.

15 THE COURT: Right. I'm looking at 189 now.

16 Mr. Scotton, don't you have a copy of Document Entry
17 189 in front of you?

18 THE DEFENDANT: Your Honor --

19 THE COURT: No. Can you please just answer my
20 question so we can get through this hearing and you can say
21 what you want to say?

22 Do you have a copy of Docket Entry 189 which is
23 government's response to motion to compel Brady and Kyles
24 material?

25 THE DEFENDANT: No, I don't.

1 THE COURT: All right. Would you -- the government
2 had indicated that they gave you a copy of that just a few
3 minutes ago. Could you look through your papers there and see
4 if you have it?

5 THE DEFENDANT: Your Honor, is there any way I can get
6 the handcuffs removed so I can go through my paperwork? It's
7 almost impossible for me to do anything here. I got my lawyer
8 here and we got the marshals.

9 THE COURT: Let's go with this issue first. Do you
10 have a copy there of the government's response to motion to
11 compel Brady and Kyles material?

12 THE DEFENDANT: Yes, I got it right here.

13 THE COURT: Do you see attached to that Docket Entry
14 189 is an immigration filing?

15 THE DEFENDANT: Your Honor, this is not correct.

16 THE COURT: Do you see that you have attached to that
17 pleading an immigration filing, sir, that the government has
18 produced?

19 THE DEFENDANT: Well, Your Honor, what the government
20 has produced during the hearing is a fake letter from
21 immigration.

22 THE COURT: Sir, I'm asking you a very simple
23 question. I know you have a lot of allegations to make, but in
24 Docket Entry 189 --

25 THE COURTROOM DEPUTY: This letter is not right, Your

1 Honor. What you want me to say, that this is a made up letter?

2 This letter is not right.

3 THE COURT: Okay. So the government --

4 THE DEFENDANT: My case was not denied on March 29.

5 My case was denied on March 31.

6 THE COURT: It doesn't say March 29, sir. It says

7 April 29.

8 THE DEFENDANT: They stamp here say April -- oh,

9 that's the appealing. My hearing for bond was March 29, 2012.

10 How can ICE and the Judge Snow make a comment, say that ICE say

11 I'm appealing case? The case has not even been denied yet.

12 The case was denied on March 31.

13 THE COURT: Okay.

14 THE DEFENDANT: They present this letter here, Your

15 Honor.

16 THE COURT: Can you answer the question that I asked

17 you which is, do you have that attached to Docket Entry 189?

18 You can argue that it's --

19 THE DEFENDANT: Yes, Your Honor. I do.

20 THE COURT: If you want to argue that it's a

21 fabrication or you want to argue that it is whatever you want

22 to argue about this document, you can go ahead and argue that.

23 However, the government has produced to you what they submit is

24 the Immigration and -- the US Citizenship and Immigration

25 Services official record which is dated April 29, 2013, and it

1 states what it states. But you have that there; is that right?

2 THE DEFENDANT: Right, sir.

3 THE COURT: I am going to ask if the marshals could --
4 he's appearing pro se in this case. So if the marshals could,
5 if they would please take off his handcuffs so he can go
6 through his files and paperwork.

7 MS. MITRANI: Your Honor, would the Court like a copy
8 of Docket Entry 28 which has the original March 31, 2012,
9 denial?

10 THE COURT: Sure. Why don't you pass that up.

11 All right. So as we are going through this then,
12 we've gone through numbers one through three.

13 In number four you ask for all material of confession.
14 What are you talking about there?

15 THE DEFENDANT: Basically my files that have
16 disappeared as I mentioned before here a couple minutes ago.

17 THE COURT: What do you mean "all material of
18 confession"?

19 THE DEFENDANT: Your Honor, we have a confession
20 letter from the person that has committed this fraud in Brazil.
21 And my family has talked to what they call the police, federal,
22 in Brazil a couple of weeks ago. With the original letter and
23 the video they might be able to force them to come and testify
24 during the trial.

25 THE COURT: You're saying that the government has this

1 and they're refusing to turn it over to you?

2 THE DEFENDANT: Yes.

3 THE COURT: Okay. And finally is number five, the
4 Duarte letter and the video of the meeting between VanBrunt and
5 defendant. And what is it you're asking for there?

6 THE DEFENDANT: I want the letter that was missing.
7 The Judge Rosenbaum has a copy of the letter and video of this
8 man confessing what he did it. And I want for them to turn
9 over all of the missing part of the video.

10 THE COURT: Well, sir, isn't it true that at that
11 hearing this letter you referred to that you -- is that the
12 letter you gave to Judge Rosenbaum at the hearing?

13 THE DEFENDANT: Yes.

14 THE COURT: All right. Well, the letter was not
15 turned over to the government, as I recall, from reading the
16 transcript. But your position is that the government has that
17 letter?

18 THE DEFENDANT: Yes, they took it.

19 THE COURT: They took it when?

20 THE DEFENDANT: Whatever -- I don't know when they
21 took, Your Honor.

22 THE COURT: But --

23 THE DEFENDANT: I don't have control of my life.

24 THE COURT: Mr. Scotton, how can you make an
25 allegation that the government took this letter when you don't

1 even know when they took it?

2 THE DEFENDANT: For you, Your Honor, they have -- from
3 day one they try to incriminate me on this case, Your Honor.
4 They have sent SWAT teams to my mother's house.

5 THE COURT: Let's stay on each issue. We'll discuss
6 the other issues when we get to them.

7 You're alleging that the government took this
8 so-called Duarte letter and the video of the meeting between
9 VanBrunt and defendant.

10 When and where did the government steal that from you?

11 THE DEFENDANT: Your Honor, I'm not in the courtroom.
12 Who do you think might have interest in that letter besides the
13 government?

14 THE COURT: Where was that letter?

15 THE DEFENDANT: They have the letter. They took it,
16 Your Honor.

17 THE COURT: All right. Anything else you wanted to
18 add regarding your Brady motion which is Docket Entry 185?

19 THE DEFENDANT: Your Honor, we need to get the letter
20 and the video. Otherwise, it's going to be very difficult for
21 me with the present government to bring this man here to
22 testify.

23 THE COURT: Okay. Let me turn to the prosecutor.
24 Ms. Mitrani, if you want to go ahead and respond to the five
25 requests that are made in the Brady motion. I know you have

1 filed a written response.

2 MS. MITRANI: Your Honor, I would stand by our
3 filings.

4 And, you know, Your Honor is exceedingly well
5 prepared. This Duarte letter is taking on a life of its own it
6 appears. It was the defendant who showed it to the Court. The
7 government's never even seen it. So we're just using the
8 defendant's characterization of it. We have no idea what it
9 is.

10 So actually what I would do is, Your Honor, make a
11 request right now that the defendant turn it over to the
12 government because it seems like it's playing a prominent role.

13 I apologize. Unless the Court has any other
14 questions, we really don't have anything to add other than
15 what's in our filings.

16 THE COURT: All right. Well, let me ask you this. In
17 his request, in his Brady motion he asked for, number one, the
18 destroyed evidence, including the missing portion of the
19 surreptitious video recorded by Agent VanBrunt and other
20 evidence.

21 Is there any such destroyed evidence or missing
22 portions of the video?

23 MS. MITRANI: No, Your Honor.

24 THE COURT: Okay. And the second request is the
25 missing photographs of defendant's home removed from his files

1 in the courthouse in Broward County.

2 Does the government have that or do they have any
3 knowledge about any removal of photographs or other information
4 from Mr. Scotton's files?

5 MS. MITRANI: We have no knowledge of removal. What I
6 can tell the Court is we've -- I don't know what photographs
7 the defendant's speaking of. What I can say is we have turned
8 over his A-file where he had some submitted photographs in
9 connection with his immigration -- his bid to adjust his
10 immigration status. That's been turned over. Any other photos
11 that we have have been turned over. We have not taking
12 anything from the defendant.

13 THE COURT: Okay. Now, the pretrial -- number three,
14 the pretrial report referred to by ICE. I know you attached an
15 immigration filing to your response to the motion to compel
16 Brady and Kyles material which is Docket Entry 189. I also
17 know that back on Docket Entry 28 the government's response to
18 the defendant's appeal of detention defense order there were
19 also US Citizenship and Immigration Services documents attached
20 to that pleading as well.

21 So have you produced all of the immigration material
22 to Mr. Scotton?

23 MS. MITRANI: Yes, Your Honor, as far as I can
24 ascertain. Again, we've produced his A-file. We produced the
25 denials. If he's speaking of some other document, then it is

1 unclear of what document he's seeking. It just -- he seems to
2 be -- strike that. We produced everything that we have
3 regarding immigration.

4 THE COURT: Okay. And then in number four he's asking
5 for all material of confession. And in number five the Duarte
6 letter and video of the meeting between VanBrunt and the
7 defendant. I've tried to get the defendant to explain a little
8 bit more about that, and his response is his response.

9 What's the government's position on this material of
10 confession and Duarte letter?

11 MS. MITRANI: Well, the material of confession, we
12 took that to mean the defendant's confession and we've produced
13 the defendant's confession at Scotton 0001 to 0014. So he has
14 his own confession. The government is not aware of any other
15 confessions.

16 THE COURT: All right. Now, Mr. Scotton, when you say
17 all material of confession, are you referring to a confession
18 by Mr. Duarte that you reference in number five?

19 THE DEFENDANT: Yes.

20 THE COURT: All right. Does government have any
21 confession of Mr. Duarte or any documents relating to the
22 Duarte letter and the video of the meeting between VanBrunt and
23 the defendant?

24 MS. MITRANI: The government doesn't have any Duarte
25 letter or anything purporting to be written by Duarte. The

1 government hereby requests those materials from the defendant.

2 As far as any video, the only video of the special
3 agent and the defendant was this undercover meeting on
4 August 29, 2011, which has been turned over.

5 THE COURT: So that video has been turned over to the
6 defendant.

7 MS. MITRANI: Yes, that was the whole subject of its
8 on evidentiary hearing and that's what we started this hearing
9 today on is the allegations that it's been destroyed or
10 tampered.

11 THE COURT: You have nothing regarding this so-called
12 Mr. Duarte?

13 MS. MITRANI: No written material. No, Your Honor.

14 THE COURT: All right. Mr. Scotton, the government
15 has made a request that you produce a copy of the Duarte letter
16 to them and I will simply do this. You have certain reciprocal
17 discovery obligations under the Federal Rules of Criminal
18 Procedure. And if you intend to utilize any evidence at trial,
19 you need to comply with those rules. So I suggest that you
20 discuss that with Mr. Kreiss and make sure you comply with any
21 reciprocal discovery responses or obligations that you have
22 because if you do not comply with those, those may are or may
23 not prevent you from introducing such evidence that you seek to
24 introduce at the time of trial. Do you understand?

25 THE DEFENDANT: Yes, I have a conversation with Judge

1 Rosenbaum over this matter also, Your Honor.

2 THE COURT: Okay.

3 THE DEFENDANT: But then we got a -- the problem we
4 got here right now, then what is the original letter? I guess
5 we have to call the lawyers, previous lawyers that I have in
6 this case. They going to have to find a way to get this
7 letter.

8 THE COURT: Well, sir, I don't know what to tell you.
9 All I know is you apparently have a copy of the letter which
10 the government's never seen and I've never seen.

11 However, to the extent that your Brady motion is
12 seeking to compel turnover of Brady material and Kyles files,
13 the government has represented in writing and orally that they
14 don't have any of those documents, that they haven't taken any
15 documents from your files. So those documents don't exist. So
16 I can't compel the government to turn over something that they
17 do not have.

18 THE DEFENDANT: Okay, your Honor. Then we going to
19 have the problem here then, number three here. How come they
20 make statements in Court in my immigration case it is denied
21 when it is not denied?

22 THE COURT: Did you reread the government's response
23 to that?

24 THE DEFENDANT: Your Honor, this response right here,
25 she's talking about my appealing. This is April 29, 2013.

1 We're talking about here March 29, 2012. How can ICE make a
2 statement, say that my case -- I'm appealing a case, that is
3 case has not even been denied yet. The case was denied
4 March 31. I don't know if -- I guess we're going to go to the
5 second motion here.

6 THE COURT: Well, we'll do that when we finish this
7 motion.

8 THE DEFENDANT: But, you know, I want to see what ICE
9 has presented to the Court because it shows -- I don't have the
10 order of detention here, but it shows in the order of detention
11 that prosecutor has spoke to -- I guess ICE has spoke to
12 pretrial service and they told the Court that I'm appealing my
13 case. I'm not appealing my case because my case is not even
14 denied. So either someone here is hiding something, someone is
15 lying about something, or I need to see this appealing that
16 they claim that I was doing already in March 27, 28, or 29.

17 THE COURT: All right.

18 THE DEFENDANT: So I want the appealing then.

19 THE COURT: Ms. Mitrani, is there anything that you
20 need to respond on that allegation by Mr. Scotton?

21 MS. MITRANI: No, Your Honor. I'm trying to decipher
22 this. All I can tell the Court is that the draft denial has
23 been produced for the defendant, and I'll identify it as part
24 of his A-file, USCIS starting at 437 and it goes on for some
25 pages. He keeps on saying pretrial report. I don't know what

1 information at this point the pretrial services report. They
2 do their own immigration checks. That's an arm of the Court.
3 Pretrial services is not an arm of the prosecution team. I
4 don't know if he's referring to them. I don't know what he's
5 referring to, Your Honor, but I think we've set forth the
6 procedural history of his immigration matter.

7 THE COURT: All right. And I know you had indicated,
8 I think at the pretrial detention hearing, there was a draft
9 immigration letter or something relied on; is that right?

10 MS. MITRANI: Right. That's what I just identified
11 that's USCIS 437 that was produced in discovery.

12 THE COURT: And then after that an actual formal
13 letter was issued by them; is that right?

14 MS. MITRANI: Correct. That's at Docket Entry --
15 attached to Docket Entry 28.

16 THE COURT: At 28. Okay.

17 All right. As far as Docket Entry 185, motion to
18 compel, turnover of Brady material and Kyles files, the Court
19 is going to deny that motion in light of the government's
20 representation repeatedly that they have not any of those items
21 in their possession that they can turn over. The Court cannot
22 compel the government to turn over items that they do not have.
23 There's no evidence that the government has destroyed any
24 evidence or they've taken any photographs or they have any
25 material of confession as requested by the defendant or that

1 they have the Duarte letter. The only thing the government
2 does have that's referenced in this motion appears to be the
3 video of the meeting between VanBrunt and the defendant which
4 was previously produced to the defendant and then whatever
5 immigration documents the government has produced to
6 Mr. Scotton. So I'm going to ahead and I'm going to deny
7 Docket Entry No. 185.

8 THE DEFENDANT: Your Honor, you say that they have
9 give me the paper that I'm asking on this motion here?

10 THE COURT: I don't understand what you're saying.
11 Which paper, sir?

12 THE DEFENDANT: You say they have provided me the
13 immigration paper.

14 THE COURT: Right.

15 THE DEFENDANT: They have not.

16 THE COURT: I don't know what to tell you other than
17 the fact that I'm looking at Docket Entry 28, which is the
18 government's response to defendant's appeal of detention order,
19 and attached to that which is a public filing in the Court
20 record which you would have received a copy of.

21 THE DEFENDANT: It is a paper that I was read a couple
22 of days ago.

23 THE COURT: No. Wait. Just a second. That's a
24 decision on application for status as permanent resident.
25 That's seven pages of US Citizenship and Immigration Services.

1 And those are under -- in the Court file at Docket Entry 28-1
2 all the way through Page 7 of that.

3 Additionally, they've just filed Docket Entry 189
4 which at 189-1 has three pages of US Citizenship and
5 Immigration Services documents which discuss your immigration
6 situation.

7 So the government has produced it. I can make that
8 finding, that they have produced it just by looking at the
9 public filings in this case and the documents that are attached
10 to the public filings.

11 So when you say they haven't produced something to you
12 that's in the public record, it's hard for me to understand
13 what you're talking.

14 THE DEFENDANT: Something it fishy. Because I'm
15 trying to explain to the Court. Maybe my English is not
16 getting to the Court.

17 THE COURT: No. Your English is just fine, sir. I've
18 had several hearings with you and your English is just fine.
19 It has nothing to do with your English.

20 THE DEFENDANT: I'm trying to understand here how can
21 they claim that my case -- I'm appealing a case that a case has
22 not been denied yet.

23 Judge Snow made a comment on this detention order and
24 she said the pretrial service has spoke to ICE and ICE said I'm
25 appealing -- I'm currently appealing my case. And this is

1 somewhere around March 27, 28, and 29. And my case was denied
2 on March 31. So something here is not right here because they
3 cannot claim that they have appealing pending when my case is
4 not even denied yet.

5 THE COURT: All right. Well, you can certainly make
6 that argument as you proceed through this case and as you
7 proceed in any other capacity in this case, but for purposes of
8 the Kyles/Brady motion, I'm going to deny that motion.

9 Now, let's go to the next motion which is Docket Entry
10 No. 164 which is Defendant's Scotton motion to quash
11 government's subpoena and dismiss the indictment as a sanction
12 for prosecutorial misconduct. That's a lengthy motion. I
13 think it's 13 pages. And the government has responded to that
14 motion to quash subpoena and dismiss the indictment in Docket
15 Entry No. 187.

16 THE DEFENDANT: Your Honor --

17 THE COURT: Yes.

18 THE DEFENDANT: -- my standby lawyer here just managed
19 to find the document that I was looking for about ICE report
20 saying that I'm appealing my case. It's right here. So what
21 I'm asking for -- it's Document Entry No. 16.

22 THE COURT: Docket Entry No. 16?

23 THE DEFENDANT: Yes.

24 THE COURT: What is that entitled?

25 THE DEFENDANT: Well, when -- the detention order.

1 THE COURT: Okay. I've read the detention order
2 issued by Judge Snow.

3 THE DEFENDANT: Defendant has overstayed his appealing
4 application. What is that appealing application? They claim
5 in here at this time when my case was not denied.

6 THE COURT: That was Judge Snow's finding. Government
7 indicated that --

8 THE DEFENDANT: Your Honor, someone represented false
9 documents to this Court from left and right. I need to see all
10 of the documents.

11 THE COURT: The government has indicated that they
12 produced everything to you. The fact that there is a prior
13 detention order entered by Judge Snow, her findings are her
14 findings. You appealed that detention order and that was
15 denied. So that's a separate matter.

16 What I'm dealing with on the Kyles/Brady motion is the
17 government -- whatever the government has in their possession
18 that you're requesting that they turn over, and they've
19 responded that they don't have any additional information.

20 THE DEFENDANT: Your Honor, something has been
21 presented to the Judge Snow. I'm not even talking about the
22 bond situation that she denied. Documentation has been
23 presented to this Court. Here, like I have two letters from
24 immigration here that I'm going to have an immigration expert
25 come to testify that this letter here they presented, it is --

1 they falsified letter.

2 THE COURT: Okay. Well, you can certainly do that,
3 but at this stage right now, Mr. Scotton, there's nothing for
4 me to order the government to produce to you.

5 THE DEFENDANT: Well, so they can go ahead corrupt the
6 video and make things disappear and that's it.

7 THE COURT: Well, there's no evidence that they
8 corrupted a video and made things disappear. That's the
9 problem. All you have is what you're stating. You don't have
10 any evidence to support it.

11 THE DEFENDANT: Then we have to bring all of the
12 lawyers to this court to testify, Your Honor, because my files
13 are missing. All my files, all my pictures, everything is
14 missing. All of the receipts that I provided to my lawyers, it
15 disappeared. So who has the dish (sic) to go ahead and make my
16 file disappear, Your Honor?

17 THE COURT: I don't know, Mr. Scotton. Let's go to
18 the next motion which is Defendant Scotton's motion to quash
19 government's subpoena and dismiss the indictment -- I'm sorry.
20 We were -- I think we were going to start on -- we did the
21 motion to compel, turnover the Brady file and Brady material
22 and Kyles files. And then after that -- the next motion we
23 were going to go to was the motion to quash the government's
24 subpoena and dismiss the indictment as a sanction for
25 prosecutorial misconduct, that's 164, and the government

1 responded to that, and the government's response to the motion
2 to quash subpoena and dismiss indictment at Docket Entry 187.

3 So, Mr. Scotton, I've read though this motion which is
4 13 pages in which you are arguing that the government
5 improperly served a subpoena. I take it it was on your
6 father-in-law I believe is what it was or --

7 MS. MITRANI: Stepfather.

8 THE COURT: Sorry. Stepfather. I read through the
9 motion and the response. So if you can please present any
10 argument that you wish on the motion to quash the government's
11 subpoena.

12 THE DEFENDANT: The motion -- have you seen the
13 subpoena they hand to my step-dad?

14 THE COURT: I don't have a copy of that. No, sir.

15 THE DEFENDANT: Well, I have a copy here. If you
16 would like to see that?

17 THE COURT: If you would like to introduce a copy, I
18 would be happy to take a look at it.

19 MS. MITRANI: Your Honor, if you will, I just want to
20 make sure that it's the one that was actually served. And
21 actually, if the Court will, it gets a little confusing because
22 of the span. There was one served August 2012 and another
23 served August 2013. Since I think the defendant is complaining
24 about both, we'll hand both up to the Court.

25 THE COURT: Okay. So there were two subpoenas because

1 there were two trials coming up, two different trial dates.

2 MS. MITRANI: Exactly. Coincidentally both in August.
3 You know what, Your Honor? I'm going to hand back the
4 defendant's because his is marked up. If the Court wants to
5 see his. But we'll hand up ours.

6 THE COURT: Would you show this to Mr. Scotton?

7 MS. MITRANI: Yes, we have copies.

8 THE COURT: If the parties have no objection, I'll
9 make those an exhibit at the hearing today.

10 MS. MITRANI: That's fine, Your Honor.

11 So, Your Honor, what I'm giving the Court are two
12 subpoenas, and I've marked for the east of the Court on the
13 upper right-hand corner. One says 2012 in purple ink and one
14 say 2013.

15 THE COURT: Before you bring that up, would you show
16 those to Mr. Scotton?

17 MS. MITRANI: I have gave him the copy of 2013, and
18 I'm trying to give him a copy of 2012.

19 THE DEFENDANT: That is not the subpoena they present
20 to my step-dad.

21 MS. MITRANI: Your Honor, I don't have a copy of the
22 attachment to the 2012 subpoena. I apologize. I can show it
23 to him if I can walk up and --

24 THE COURT: Why don't I hand these two back. Why
25 don't you just go through those and make sure that that's what

1 he's referring to, and then we can hopefully move on with the
2 hearing. Why don't you show have Mr. Kreiss hand that to him.

3 And, Mr. Kreiss, those are the two subpoenas that the
4 government indicates that they've had issued in this case. And
5 is Mr. Scotton --

6 Mr. Scotton, are you taking any objection to those two
7 subpoenas?

8 THE DEFENDANT: It's not the same.

9 (Defendant and standby counsel conferring sotto voce.)

10 THE COURT: All right. So I have here, first of all,
11 a subpoena to testify at a hearing or trial in a criminal case
12 in Case Number 12-60049-CR-KMW. And at the upper right it says
13 2012. The second document I have is a subpoena to testify at a
14 hearing or trial in a criminal case in Case Number
15 12-60049-CR-Rosenbaum which is upper right states 2013. These
16 are the two subpoenas that the government indicates that they
17 have served.

18 Do you have any objections to the Court making these
19 two subpoenas part of record here, Mr. Scotton?

20 THE DEFENDANT: No, Your Honor.

21 THE COURT: All right. And you agree that those are
22 the two subpoenas that were served?

23 THE DEFENDANT: That's correct.

24 THE COURT: Thank you. So I'm going to make this --
25 I'll make it a Court's Exhibit No. 1, and that will be the 2012

1 subpoena, and Court's Exhibit No. 2 will be the 2013 subpoenas.

2 (Received in evidence Court's Exhibit(s) 1 and 2.)

3 THE COURT: I have those and I have reviewed those.

4 So now, Mr. Scotton, going back to your motion to
5 quash the government's subpoena and dismiss the indictment as a
6 sanction for prosecutorial conduct, if you could explain to me
7 why it is that because the government issued these two
8 subpoenas the government should be sanctioned and the subpoena
9 should be quashed.

10 THE DEFENDANT: Your Honor, first of all, it is
11 intimidation. My family is an old couple and they getting sick
12 and tired of having agents come to the house with guns, badges
13 in the face. Neighbors start talking. People start sending
14 them requests to go to meetings. Why they always have a bunch
15 of police officers at their door intimidating them. I don't
16 want to say -- Thursday we have three agents at my mother's
17 house. She's complete devastated. They knock at the door like
18 they're going to pull the door down. Knock on the window.
19 Guns, badge on a 70-year-old lady, legally blind face. How far
20 we going to go with this? They have nothing to do with this
21 case. They have not done nothing wrong. They citizens of this
22 country. They pay their tax.

23 And Carlos Colon told that he's not going to testify
24 because they really fear for their life right now. The agent
25 had show up at his job several times. He almost lost his job.

1 His boss being calling him are you involved in some kind of
2 drugs behalf or something wrong that we need to know? Cops
3 keeping coming calling you, people keeping check with the
4 department, your situation.

5 And the subpoena speaks for itself, Your Honor, on the
6 Rule 1617. The subpoena here deficient for information. So
7 they ask for all records or all kind of stuff that my family
8 doesn't even know who those people are.

9 So I'm not a lawyer, but the lawyer that has helped me
10 draft this motion told me that this kind of behavior here is
11 outrageous. They should not be fishing my family for
12 information. They already went to my family's house. They
13 already took stuff from my family's house. How long more are
14 we going to go with this nonsense?

15 THE COURT: The two subpoenas you're referring to, the
16 2012 subpoena is directed to Carlos M. Colon at an address in
17 Margate, and the second subpoena is addressed to Carlos Colon,
18 the 2013 subpoena. Is Carlos M. Colon -- you keep saying
19 members of your family. Is Carlos Colon a member of your
20 family?

21 THE DEFENDANT: Yeah, he's my stepfather. He's
22 married to my mother.

23 THE COURT: Okay. And you understand that the parties
24 in the case can issue trial subpoenas for documents to be used
25 at trial? Do you understand that?

1 THE DEFENDANT: Not to fishing for information, Your
2 Honor, as I understand the regulation, the rule.

3 THE COURT: All right. Why is it that I should quash
4 either of these two subpoenas?

5 THE DEFENDANT: Because my family has been threatened
6 with the subpoenas. And what the government look right now
7 it's fishing for information to incriminating me.

8 THE COURT: All right. Let me turn to the government
9 and see if I can get a response.

10 MS. MITRANI: Does the Court have a question or just
11 generally address the defendant's submission?

12 THE COURT: Yes, I did receive your -- and review the
13 government's response to the motion to quash the subpoena, but
14 it appears the government (sic) here is arguing that the agents
15 went out and they -- I'm assuming that they threatened or
16 intimidated Mr. Colon and threatened or intimidated his mother
17 as well, the defendant's mother as well.

18 MS. MITRANI: You're assuming that the defendant said.

19 THE COURT: Yes, that's what the defendant has said.
20 And, additionally, that the subpoenas are requesting
21 information which is a fishing expedition which I interpret
22 that to mean it's irrelevant to the trial. So if you can just
23 briefly just orally respond to those two issues.

24 MS. MITRANI: Absolutely, Your Honor. At the outset I
25 want to say at no point in time was the government threatening in

1 any way, shape, or form the defendant's stepfather or his
2 mother.

3 As set forth in our submission, it became clear during
4 the investigation that Mr. Colon had involvement in the
5 defendant's business. The simplest way to say that is
6 by Mr. Colon's own admission he had involvement in the
7 defendant's business. He said he helped the defendant with
8 websites, updating websites, and performing some other
9 ministerial duties.

10 Outside of Mr. Colon's statement, we've seen many
11 checks payable to Mr. Colon. We have seen at least one witness
12 and maybe more identify Mr. Colon as an individual who's
13 dropping off packages for delivery, packages that are the
14 subject of the indictment. And quite significantly, Your
15 Honor, Mr. Colon's return address or should I say Mr. and Mrs.
16 Colon's return address is on hundreds of packages. So needless
17 to say, there's -- the evidence would indicate there's some
18 kind of involvement there the scope of which is incumbent upon
19 us to investigate.

20 Along those lines, we issued trial subpoenas in
21 advance of both trials to see if there were any documents or
22 any information that would be germane to the trial of this
23 matter. The subpoenas were issued lawfully.

24 And this year, for example, in August Agent VanBrunt
25 went to Mr. Colon's house in the evening about 7:30 at night,

1 he knocked at the door, Mr. Colon answered. Mr. Colon knows
2 who Mr. VanBrunt is, they had met on several occasions. So
3 there was no badge in his face and certainly, Your Honor, no
4 guns or anything of that nature. Agent VanBrunt served the
5 subpoena and basically left. He didn't enter the house. There
6 was no subjective discussion. I think the whole encounter
7 lasted maybe ten minutes. Is that right?

8 AGENT VANBRUNT: 20 seconds.

9 MS. MITRANI: Okay. The whole encounter lasted maybe
10 20 seconds this year.

11 Last year, Your Honor, August of 2012, again, we're
12 gearing up for trial. We have less information last year than
13 this year. We know Mr. Colon works. It was the middle of the
14 day. Agent VanBrunt went to his place of business. It's a VA
15 facility. Agent VanBrunt was able to gain entry. He met with
16 Mr. Colon privately, identified himself, showed him his badge
17 as to who he was, served him with a trial subpoena. I think at
18 the end of the interview served him with a trial subpoena. In
19 advance of that asked Mr. Colon if he could ask him a few
20 questions. They sat down and talked. That encounter lasted
21 maybe ten minutes. Towards the end Mr. Colon didn't want to
22 speak any more. Agent VanBrunt was very respectful, served him
23 with the trial subpoena, told him generally what was expected
24 of him, and left.

25 So to be very clear, there was never any guns, there

1 was never any physical intimidation, there was never any verbal
2 intimidation. It was in a sense normal ordinary investigative
3 work in the run up to a trial.

4 I think one of other thing that Mr. Scotton complains
5 about in his submission is the venue issue. As the Court is
6 aware, this case was originally assigned to Judge Williams. It
7 was a late August trial setting in front of Judge Williams.
8 The subpoena was served for his appearance with Judge Williams.
9 I think a day later or two days later the venue was changed.

10 Mr. Colon found out about that venue change because
11 then there was a hearing before Judge Rosenbaum, calendar call
12 in effect, because there was a change of counsel and Mr. Colon
13 was there.

14 This year, Your Honor, he was served for the August 26
15 trial setting. Mr. Colon appeared. Agent VanBrunt met him at
16 the courthouse. Agent VanBrunt told him that the trial had
17 been postponed, that his appearance was no longer required.
18 Agent VanBrunt asked him if he had any documents. Mr. Colon
19 and Mrs. Colon indicated they didn't, and they were off on
20 their way.

21 I should add in addition to everything else that I've
22 side, this defendant has indicated on many occasions that there
23 are all sorts of exculpatory documents in existence. So to the
24 extent Mr. Scotton isn't turning them over, that's another
25 vehicle to perhaps obtain those documents since that address

1 appears on hundreds of packages. So everything was done in
2 accordance with the Federal Rules of Criminal Procedure.

3 THE COURT: All right. Has the government received
4 any documents back yet from Mr. Colon in response to either of
5 the two subpoenas?

6 MS. MITRANI: The government has not received any
7 documents. And according to Agent VanBrunt, Mr. Colon
8 indicated they have no documents.

9 THE COURT: They have no documents. All right. Thank
10 you.

11 Now, Mr. Scotton, do you have any affidavit --

12 THE DEFENDANT: Your Honor --

13 THE COURT: Please, I'm asking you a question, sir and
14 then you can say what you like.

15 Do you have an affidavit from Mr. Carlos Colon
16 attesting to these facts that you are alleging that the
17 government committed against Mr. Colon?

18 THE DEFENDANT: If I do, it's right now sitting in
19 FDC. I just got moved when they sent to me the affidavit. And
20 they're willing to come and testify also to say what I'm saying
21 in court today.

22 THE COURT: Well, why are they not here today to
23 testify?

24 THE DEFENDANT: Because he has to work, Your Honor,
25 and my mother is sick trying to recover from surgery that she

1 went through last year.

2 THE COURT: Do you have -- have you filed or do you
3 have an affidavit from Mr. Colon alleging that these acts were
4 committed?

5 THE DEFENDANT: Your Honor, during the visitation they
6 always complain to me.

7 THE COURT: No, no. I understand --

8 THE DEFENDANT: I have document. I didn't receive the
9 affidavit yet. As a matter of fact, they sent a copy to
10 Rosendale and they send a copy to Judge Moreno as well, made a
11 complaint to the chief of judge here in South Florida.

12 THE COURT: Okay. Well, here is the situation.
13 You're making allegations regarding what you believe occurred
14 when the government confronted or served a subpoena on
15 Mr. Colon and apparently had discussions with Mr. Colon and
16 maybe also Mrs. -- your mother as well.

17 Now, the problem with that is that the government
18 denies those allegations. You have no proof of those
19 allegations whatsoever. You've not filed any affidavit from
20 Mr. Colon. You've not filed any affidavit from your mother as
21 to what you say occurred. You certainly weren't there. So you
22 can't testify as to what occurred. All you can testify to is
23 what Mr. Colon told you or what your mother may have told you.

24 So what I'm going to do is I will enter either an
25 order or an R & R on Defendant Scotton's motion to quash the

1 government's subpoena and dismiss the indictment as a sanction
2 for prosecutorial misconduct and I am going to deny it or
3 recommend that it be denied without prejudice to the
4 possibility that if you wish to, you can produce evidence by
5 form of an affidavit from Mr. Colon or an affidavit from your
6 mother attesting to these facts that you allege, and the Court
7 can review those. And if they submit a sufficient basis for a
8 hearing, then the Court will set an evidentiary hearing on it.

9 But for right now the motion is devoid of any proof at
10 all. You've had plenty of time to get an affidavit from
11 Mr. Colon. You've had plenty of time to get an affidavit from
12 your mother. You've had plenty of time to have Mr. Colon and
13 your mother here in court, and none of them are here.

14 So what I'm going to do is I'm going to deny the
15 motion, but I'm going to state that it's without prejudice.
16 That if you go ahead and you obtain affidavits, you can submit
17 those and file those with the Court. And if the Court finds
18 those are sufficiently precise and probative and relevant, then
19 the Court can, if it desires to, set down an evidentiary
20 hearing on the matter.

21 All right. Mr. Scotton did you understand what I
22 said?

23 THE DEFENDANT: Your Honor, you say that I have plenty
24 of time. When did I have plenty of time? First of all, I have
25 no idea I had a Court set up here this day. They just took me

1 out of FDC last Friday and I have no idea why. As far as I
2 understand, they took off my case. They tried to appoint
3 another magistrate to the case in Miami. She refused the case.
4 I have no idea why she refused the case. Then they tried to
5 appoint Patrick Hunt. Patrick Hunt is not on the case. I
6 guess they put you back in the case.

7 THE COURT: Did you read the order?

8 THE DEFENDANT: I've been in the SHU for 20 days for
9 no reason.

10 THE COURT: Sir, did you read the order from Judge
11 Rosenbaum about that?

12 THE DEFENDANT: No, sir.

13 THE COURT: Okay. Well, maybe if you would take some
14 time to read the Court file in this case instead of making
15 allegations which are not supported by facts, it might help
16 you. There have not been seven magistrates taken off this
17 case, sir. It's not -- it's simply not an accurate statement.
18 It's just not.

19 And all that has happened is a matter was referred to
20 Magistrate Judge Alicia Valle who recused herself. There was a
21 matter referred to Mr. Hunt, Patrick Hunt, United States
22 Magistrate Judge, and that order of reference was simply
23 withdrawn. It is routine in criminal cases for different
24 matters to come in front of different magistrate judges.
25 Matters such as detention hearings come in front of a duty

1 magistrate judge. That was Judge Snow at the time. Other
2 matters come in front of other magistrate judges. That's just
3 the routine way this court works in every single case,
4 Mr. Scotton.

5 So those allegations Judge Rosenbaum has already dealt
6 with. She's already entered an order denying your other motion
7 to dismiss or for some relief based on that allegation about
8 the different United States magistrate judges on your case.
9 And if you'll take the time to read that, it might educate you
10 on what's really occurred in this case.

11 However, as to your motion to quash the government's
12 subpoena and dismiss the indictment as a sanction for
13 prosecutorial misconduct, as I indicated, that's going to be
14 denied without prejudice. And what the Court has indicated to
15 you is that if you wish to present evidence from your mother or
16 from Mr. Carlos Colon, you can file affidavits with the Court
17 if you would like to do that. And then if the Court finds that
18 there's a sufficient basis for an evidentiary hearing, the
19 Court can set down an evidentiary hearing where you can have
20 your family testify, if you would like to, if that's what you
21 would like to do.

22 All right. Do you understand, Mr. Scotton?

23 THE DEFENDANT: Can I call the agent on the stand at
24 this point then, ask him a few questions?

25 THE COURT: Can you call the agent on the stand at

1 this point?

2 THE DEFENDANT: Yes.

3 THE COURT: To ask him what?

4 THE DEFENDANT: Questions about, you know, all of
5 these intimidation of my family, what he has been telling my
6 family. I got a SWAT team coming to my house this past
7 Thursday. Because I called SWAT. You're going to send three
8 agents over there to my mother's house knowing that my step-dad
9 is not home, she's sick? Why they send three FBI agents to the
10 house for?

11 THE COURT: You say this past Thursday. That wouldn't
12 have anything to do with these two subpoenas, would it, or
13 would it?

14 THE DEFENDANT: I don't think so, Your Honor.

15 THE COURT: Okay.

16 THE DEFENDANT: And to me it's all part of the
17 intimidation here.

18 THE COURT: Right. But as far as the motion that's at
19 issue here which is the motion to quash the government's
20 subpoena and dismiss the indictment as a sanction for
21 prosecutorial misconduct, what evidence would you seek to
22 elicit from the agent that would be relevant to that particular
23 motion?

24 THE DEFENDANT: Your Honor, why the agents go to my
25 house when the statement of the prosecutor is not even true?

1 My step-dad never worked for me. He never did anything for me.
2 If she checks, I was paid for my step-dad. I used to pay the
3 insurance. I used to pay the mortgage. I used to pay the car
4 insurance. So sometimes I wrote check for them to go ahead pay
5 their bills. Because I wrote checks to them they make them
6 work for me? I never have an employee. I work from home. It
7 is not like a huge business. And sometimes my mother receive
8 packages, yes, because I'm out of town racing cars as a
9 professional race car driver.

10 So all of these statements that they keep saying here
11 and everything -- and they just make a statement right now that
12 I should take my time, Your Honor. When can I have a time when
13 they make people send me to the SHU for 20 days for no reason.
14 I'm sitting in SHU over there. I have not been able to review
15 my papers, papers keep disappearing.

16 THE COURT: Okay. Let's stick with the issue we're
17 talking about.

18 THE DEFENDANT: We need to go over everything, Your
19 Honor, because I'm really tired of it.

20 THE COURT: Yes. Well, I'm trying to do that and I'm
21 trying to go through everything, and you seem to keep going off
22 on other areas.

23 THE DEFENDANT: Well, I'm staying with the motion to
24 try to dismiss the motion of this misconduct of the fishing for
25 information because the subpoena is flat out fishing for

1 information. My step-dad has no involvement with this
2 business, never had. And they try to fish them and pressure
3 them to help them with their case.

4 I mean, if they so, you know, positive they have such
5 a great strong case against me, why they keep sending agent to
6 my family, why agents keep following my family when they go to
7 the church, when they go to the store? They don't a have a
8 life. They been followed by these agents all of the time now.
9 What is all of this nonsense, Your Honor?

10 THE COURT: Mr. Scotton, what you indicated a minute
11 ago was that you wished to call Agent VanBrunt regarding the
12 defendant's motion to quash the government's subpoena. What is
13 it that you would specifically like to ask Agent VanBrunt about
14 the motion to quash government subpoenas?

15 THE DEFENDANT: About his behavior when show up at my
16 mother's house.

17 THE COURT: What's the government's response to?

18 MS. MITRANI: Judge, we would object for the reasons
19 the Court stated. These are the defendant's, you know, flat
20 out allegations without any support. You know, if Mr. Colon
21 were here, he could testify, I could cross-examine him, and I
22 can put on Agent VanBrunt, and Mr. Scotton could cross-examine.
23 But I think it is wholly improper to call the agent at this
24 juncture. I don't think procedurally it is right at all.

25 THE DEFENDANT: I tried to present the evidence

1 through him then. He was there. He was the one who served the
2 subpoena. He was there so.

3 THE COURT: Right.

4 THE DEFENDANT: I'm trying to present the evidence
5 through him.

6 THE COURT: I understand that, sir. However, here is
7 the situation. You've made an allegation which is in effect
8 your proffer that Mr. Colon and your mother were somehow
9 threatened or intimidated by the agent who went to your house,
10 Agent VanBrunt. Now, the government has made their proffer.

11 THE DEFENDANT: Well, Your Honor --

12 THE COURT: Mr. Scotton, would you listen to what I
13 say before you talk?

14 THE DEFENDANT: Right.

15 THE COURT: The government has made their proffer in
16 which they've indicated that there was no such intimidation,
17 there was no threatening. What I told you was you need to at
18 least make a colorable claim.

19 THE DEFENDANT: Okay, Your Honor. Let's get my mom
20 and step-dad on the phone right now. They can testify on the
21 phone, right?

22 THE COURT: That's not how it's done. You're going to
23 need to get affidavits from your mother and your stepfather.
24 And if the Court finds that there's a sufficient basis for your
25 allegations, the Court will set down an evidentiary hearing.

1 And at that evidentiary hearing you can call Mr. Colon, you can
2 call your mother, and the government, I'm certain, would call
3 Agent VanBrunt, and you would have right to cross-examine the
4 agent. But I think we need to do this properly and
5 procedurally. You have to make some showing for your
6 allegations other than just bearing allegations. And right now
7 all you have is bear allegations that are supported by nothing.
8 So I'm giving you the opportunity to do that, but at this time
9 I will deny the motion without prejudice to you going ahead and
10 establishing the sufficient foundation in the record.

11 THE DEFENDANT: Okay. When we go to have another
12 hearing so I can bring my family?

13 THE COURT: Well, that's up to you, sir. As I said,
14 if you can get those affidavits filed, we can review them, the
15 Court with review them and determine when a hearing would be
16 set if one would be set at all. If the affidavits are
17 insufficient, then the Court is not going to afford you and
18 evidentiary hearing. If the affidavits are sufficient, the
19 Court would afford you an evidentiary hearing. But I think you
20 have to make some showing, you have to make some basis to
21 support your allegations.

22 When would you be able to file the affidavits,
23 Mr. Scotton?

24 THE DEFENDANT: I need to go back to FDC to get my
25 files because all of the mails are received out of FDC.

1 THE COURT: All right. Well, I will leave that up to
2 you. You have standby counsel. You can talk about how you
3 wish to proceed. But what I'm finding at this point is your
4 motion to quash the government's subpoena is without any
5 foundation at all, it has no support at all, and I'm going to
6 deny it, as I said, without prejudice to you to somehow coming
7 forward with evidence to support your allegation.

8 Now, the next motion is the Defendant Rogerio
9 Scotton's Motion, A, to dismiss Indictment, B, to remove the
10 prosecutor Mitrani from the case and/or, C, to removal agent
11 VanBrunt from the case. And that's Docket Entry No. 178. And
12 the government's response to that motion is found at Docket
13 Entry No. 188.

14 Now, in this motion, sir, the relief you're requesting
15 is to dismiss the indictment and remove Ms. Mitrani from the
16 case and remove Agent VanBrunt from the case. Why should the
17 Court grant that relief?

18 THE DEFENDANT: Can I have a minute, Your Honor?

19 THE COURT: Certainly.

20 All right, Mr. Scotton. This is the defendant's
21 motion to dismiss the indictment, to remove prosecutor Mitrani
22 from the case, and remove agent VanBrunt from the case.

23 Do you wish to present anything on that?

24 THE DEFENDANT: Your Honor, first of all, I want to
25 present this. The two immigration letters that I got in my

1 hand. I want to file those with the Court.

2 THE COURT: All right. Can I take a look at those?
3 Why don't you show those to Ms. Mitrani first.

4 MS. MITRANI: Your Honor, he can hand them up. I'll
5 just for the Court, I don't know what -- these seem to be
6 marked up, incomplete documents. You can even see from the
7 Bates labeling that they are not complete. So on that grounds
8 we would object.

9 THE COURT: All right. Let me take a look at them.

10 All right. Now Mr. Scotton, what you've handed to me
11 is a marked up letter with no date from the US Citizenship and
12 Immigration Services. At the bottom it's Bates stamped under
13 USCIS437. And then you've also handed me a letter which
14 appears to be dated March 31, 2012, from US Citizenship and
15 Immigration Services which at the bottom right is USCIS701.
16 Both of these are addressed to you. And you want me to admit
17 these two exhibits for what purpose, Mr. Scotton?

18 THE DEFENDANT: Because the letter that was seeking
19 to -- that's the letter they forged the letter to present in
20 court on March 29th. The letter is not real letter. I spoke
21 to an agent from immigration down at FDC. He confirmed that to
22 me. So at this point I would like to call VanBrunt on the
23 stand and ask him a few questions about the letter.

24 THE COURT: Well, but the first letter that you've
25 handed me has no date on it. The second letter has a date of

1 March 31, 2012. How do these two letters relate one to the
2 other, sir?

3 THE DEFENDANT: Both letter seems to claim to be that
4 was denied of my immigration case. How Mitrani has the letter
5 in court on March 29 in the morning when the case was denied on
6 March 31? And that is the problem over there in that letter,
7 if you look really close at the letter Your Honor. There's
8 more problems in that letter over there.

9 When I file my immigration papers with immigration --
10 as a matter of fact, VanBrunt has reported in his reports that
11 I give my mother's address. As always I have give the fact
12 that I always travel on my race and my racing events.
13 Everything that I do goes to my mother's address. As a matter
14 of fact, every single communication immigration goes to the
15 address you see right there, 777 Margate, Florida.

16 So out of the blue now immigration has in it's system
17 some address in Collins Avenue in Miami Beach. That letter is
18 a fake letter. They use that letter to prevent Magistrate Snow
19 give me bond on that date.

20 THE COURT: All right. Let me ask the government to
21 please respond.

22 MS. MITRANI: Your Honor, the one that's USCIS437 is
23 the draft letter that was shown at the detention hearing on
24 March 29 that was never sent to the defendant.

25 THE COURT: All right. So, Mr. Scotton, the

1 government is advising that the document entry USCIS No. 437
2 which has no date which is addressed at you the Collins Avenue
3 address, that was a draft document which was -- which they had
4 at the time pretrial detention hearing.

5 THE DEFENDANT: You want to believe, Your Honor,
6 that --

7 THE COURT: I'm telling you what they're stating.

8 THE DEFENDANT: What they say, that is not true, Your
9 Honor. Because they need to believe the immigration, a federal
10 office going to send a draft without signature and date and
11 going to have the wrong address on the letter? My name is --
12 it is spelling wrong. The address is wrong. Come on, Your
13 Honor.

14 THE COURT: All right. Ms. Mitrani, so the first
15 document here which is the undated letter to Mr. Scotton at
16 3100 Collins Avenue, that is a draft letter that you had --
17 that your office received from Citizenship and Immigration
18 Services.

19 MS. MITRANI: Not quite. It is a draft -- it is a
20 first page of a draft letter for the stuff that -- the
21 documents were only one page -- was contained in the
22 defendant's A-file that the government had in court on the day
23 of the detention hearing.

24 THE COURT: So you had the A-file in court and this
25 document was contained in the A-file.

1 MS. MITRANI: Yes, sir. Yes. Yes, sir.

2 THE COURT: Okay.

3 MS. MITRANI: And as I stated many times before, the
4 complete A-file has been turned over to the defendant.
5 Obviously, since he's turned that document over to you.

6 So a draft, as the Court knows, is something that is
7 in the file but not necessarily something that goes out. The
8 government has never proffered that this went out to
9 Mr. Scotton. In fact, at the detention hearing Mr. Scotton was
10 represented not only by his defense attorney, Jonathan
11 Friedman, but his immigration lawyer was present at the hearing
12 and they said they never received this. So there's no
13 confusion on the part of Judge Snow or in that regard.

14 The record was clear, and as we have repeatedly
15 stated, two days later the final letter, the -- you know, was
16 sent out March 31. So one in a sense, these first pages of two
17 independent documents are independent of each other.

18 THE COURT: All right. So the first one, which is
19 USCIS437, that was the draft letter that was contained in the
20 A-file which you had at the pretrial detention hearing before
21 Judge Snow.

22 MS. MITRANI: Correct, Your Honor.

23 THE COURT: And then the second document dated
24 March 31, 2013, which is USCIS701, how did the government get
25 that? Was that also in the A-file?

1 MS. MITRANI: No, it wasn't in the A-file because it
2 had not been sent out.

3 THE COURT: Right. The detention hearing was what,
4 March 29?

5 MS. MITRANI: Yes, sir.

6 THE COURT: All right. So the detention hearing was
7 March 29, 2012. And you had the draft letter from the A-file
8 at that time; is that right?

9 MS. MITRANI: Yes, sir.

10 THE COURT: And then the second letter dated March 31,
11 2012, how did you come into possession of that?

12 MS. MITRANI: I believe Special Agent VanBrunt was in
13 contact with officials at Citizen and Immigration Services and
14 he obtained it from them.

15 THE COURT: Okay. And did the government -- when I
16 say the government, did the US Attorney's Office or Agent
17 VanBrunt have anything to do with allegedly fabricating either
18 of these two documents?

19 MS. MITRANI: No, Your Honor.

20 THE COURT: And do you have any idea why it was that
21 US Citizenship and Immigration Services would send the first
22 one, the draft one to a Collins Avenue address and the second
23 one to a Margate address of Mr. Scotton?

24 MS. MITRANI: It is a draft. I don't believe it was
25 ever sent. That's the whole purpose of characterizing it as a

1 draft. It's our knowledge -- to our knowledge it was never
2 sent. We're not you, know, USCIS, if you don't mind me using
3 the acronym. They're a separate part of the government.

4 THE COURT: Okay.

5 THE DEFENDANT: Your Honor, I'm going to object to the
6 comments of the prosecutor at this point, Your Honor, because
7 you know what?

8 THE COURT: Mr. Scotton, please wait one minute. When
9 she finishes, you can have a chance to say something.

10 Go ahead.

11 MS. MITRANI: They could address those matters better.
12 But to our understanding it was a draft letter, it was not
13 sent, and then the official letter was sent out the 31st.

14 THE COURT: All right. Thank you.

15 Mr. Scotton, do you wish me to make these two parts of
16 the record?

17 THE DEFENDANT: Yes, Your Honor.

18 THE COURT: All right.

19 THE DEFENDANT: If you look at the letter March 31, on
20 the -- I think on the left bottom corner it has a number, say
21 I29I.

22 THE COURT: I think it says I-291.

23 THE DEFENDANT: I29 is a code, it's an application
24 code for immigration.

25 THE COURT: Okay.

1 THE DEFENDANT: It is a code that they would not have
2 enough so draft letter that they assume they have.

3 They need to explain two things. The immigration
4 office location that He file my paperwork, it's in Oakland
5 Park. That letter come from Miami office, number one. Number
6 two, it is impossible for immigration to make a mistake and put
7 some draft information with some address in Miami Beach when
8 they have the whole time on file my address as Margate,
9 Florida. This is made up letter, Your Honor. That letter was
10 made up. This is --

11 I am going to have a lawyer from immigration and INS
12 come to testify on the letter. The letter is made up to
13 intention for me to have my bond denied.

14 They've been saying in court during the proceeding in
15 Court I just received -- just come to my attention this letter.
16 I was in shock. Like, well, I guess she has some kind of magic
17 effects machine in the court that she received the draft over
18 there. On the end of the hearing she received that. I just
19 received this. So if she received this draft, and immigration
20 lawyer that is in my case for now confirmed to me that my case
21 was denied March 31. So how can they deny my case on March 29
22 when the case it is terminated on March 31? The letter is made
23 up.

24 The intention is for Judge Snow to deny my bond
25 because that's what they used in court. That's what they used

1 in court for them to go, oh, Your Honor, don't give him a bond
2 because his case is denied, he's not going to stay here and
3 face the charge.

4 Where am I going to go, Your Honor? I live here 24
5 years. But they have been trying every single way here to
6 incriminate me or falsify, intimidate every single witness I
7 have in this case. So every single thing that I'm trying to
8 do, most of the time it is denied.

9 The Court claim that I have to take my time. I don't
10 have the time in jail. They have a policy. They put me into
11 the SHU. They don't give me my paperwork. Things seem to
12 disappear. This whole case is unfair for me. It has been from
13 day one.

14 THE COURT: I'm going to admit the letter which is
15 USCIS437 as Defendant's Exhibit 1 at this hearing, and I'm also
16 going to admit the letter which is USCIS701 which is the
17 March 31, 2012, letter as Defendant's Exhibit 2 at this
18 hearing.

19 (Received in evidence Defendant's Exhibit(s) 1 and 2.)

20 THE COURT: So those have been admitted Mr. Scotton
21 and those are in the record so you can make your claim that the
22 prosecution allegedly fabricated a customs document or an
23 immigration document. But the government has indicated that
24 they got the first document, the draft document out of the
25 A-file and then later got the subsequent document.

1 So what proof do you have, sir, that the government
2 fabricated these documents other than your -- what you've
3 claimed so far?

4 THE DEFENDANT: Your Honor, I don't know what to say
5 to you at this point. If you don't see by yourself the
6 letter --

7 THE COURT: I don't. I don't, Mr. Scotton. I don't
8 see it. I find it perfectly reasonable there would be a draft
9 letter in the A-file.

10 THE DEFENDANT: A draft letter?

11 THE COURT: Yes. I find that perfectly, sir.

12 THE DEFENDANT: So from day one when I apply to
13 immigration and they have in their system, on the computer
14 system they find my address and now they come up with some
15 crazy address out of China. And this is complete
16 understandable, because it is a draft. A federal organization
17 Immigration, Homeland Security is going to put a draft without
18 signature, date, and completely misspelled my address and give
19 some wrong address, Your Honor? This is outrageous.

20 THE COURT: Well, Mr. Scotton, that's why it would be
21 a draft letter, because they're drafting up the letter. And
22 then they obviously, it would appear to the Court, that they
23 reviewed it and when they did the subsequent letter, they got
24 the information more accurate. That's what a draft letter is.
25 A draft letter is a first draft of a letter, and then a final

1 letter which appears to be Defendant's Exhibit No. 2 is dated
2 March 31, 2012, and that's your correct address at Margate and
3 it provides the information.

4 But what I am trying to get to is, it does seem
5 perfectly reasonable to me that that document would have been
6 contained in the A-file and it seems perfectly reasonable to me
7 that the March 31, 2012, letter would have been prepared after
8 that.

9 My question to you is, what evidence do you have that
10 would support your at this point unsubstantiated allegation
11 that Ms. Mitrani or her office or the agent fabricated these
12 two documents? What evidence do you have?

13 THE DEFENDANT: So you claim that immigration send
14 letters to address that doesn't exist?

15 THE COURT: Mr. Scotton, can you answer the question?

16 THE DEFENDANT: I'm just answering you already, Your
17 Honor.

18 THE COURT: What evidence do you have?

19 THE DEFENDANT: The letter itself it speak for
20 yourself, Your Honor.

21 THE COURT: Sir, the letters do not speak for
22 themselves. The letters state what they state. However, they
23 do not establish that there was a fraud committed and they
24 certainly don't establish that Ms. Mitrani or her office or the
25 agents fabricated these documents.

1 THE DEFENDANT: Your Honor, I never went to
2 immigration office in Miami, number one. I never even go to
3 this address. I don't know if this address exist, Collins
4 avenue.

5 So you say out of the blue they going to draft a
6 letter that has no date, no signature, and they also going to
7 fabricate address, say that I live in that address. We're
8 going to send this letter to this address. It doesn't make any
9 sense, Your Honor.

10 Whatever you want to put in the record, this is a
11 false letter. I want the Court consider it, this very
12 carefully because I already draft appealing here to appealing
13 court. I'm going to go ahead and if I have to, no other
14 choice, I'm going to submit my appealing today to the appealing
15 court. Because this letter, this is misconduct from the
16 prosecutor part of presenting this letter to court.

17 THE COURT: What I wanted to ask you, and you haven't
18 answered the question yet, if you could just listen to my
19 question, aside from Defendant's Exhibit No.1 and Defendant's
20 Exhibit No. 2, which are these two letters that you say are
21 fabricated, what evidence do you have or what evidence will you
22 present that alleges that Ms. Mitrani or her office or the
23 agent were the ones who allegedly fabricated these documents?

24 THE DEFENDANT: Your Honor, let me cross-examine the
25 FBI. Let me cross-examine the prosecutor for that sake.

1 THE COURT: Well, it doesn't really go that way.

2 THE DEFENDANT: Someone is lying here, Your Honor.
3 Someone is lying here. And for sure it is not me. The letter
4 is right there, Your Honor.

5 THE COURT: Sir, I don't know that necessarily
6 somebody is lying. I think perhaps maybe you're making an
7 allegation that's simply not supported by fact.

8 THE DEFENDANT: The letter support my allegation.
9 Because it be improper for immigration send a letter to an
10 addresses that I don't live there knowing that from day one
11 when I apply for immigration status I give my mother's address.
12 So it would be impossible for immigration to try to draft a
13 letter and have some other address. Impossible. I'm not going
14 to believe that, Your Honor. I deny that. I'm not going to
15 believe that.

16 The letter is completely falsified. Even Jonathan
17 Friedman even took the letter from my hand in court and said
18 this letter is outrageous. Is no signed, no date. And for
19 them to call it as a draft from a federal building sent a
20 letter without anybody's name on it and called it a draft and
21 address do not exist, it is not even mine. The letter is
22 falsified, Your Honor.

23 THE COURT: I'm going to accept Ms. Mitrani's proffer
24 that Defendant's Exhibit 1 which is -- we'll refer to it as the
25 draft letter from US Citizenship Immigration Services was

1 contained in the A-file at the time of the detention hearing.

2 Now, as far as the March 31, 2012, letter,
3 Ms. Mitrani, did you indicate that it was Agent VanBrunt who
4 got that document?

5 MS. MITRANI: Yes, Agent VanBrunt got it from an
6 official at USCIS.

7 THE COURT: Let me do this. I'm going to ask Agent
8 VanBrunt --

9 THE DEFENDANT: Do we have the name of the official,
10 Your Honor.

11 THE COURT: Sir, don't interrupt me.

12 I'm going to ask if Agent VanBrunt will take the
13 stand, and I'm going to ask him just a few questions about this
14 Exhibit No. 2 and where he obtained it from. And then if
15 Mr. Scotton wishes to cross-examine him, he can.

16 MS. MITRANI: Okay, Your Honor. I know the Court
17 knows, this was not drafted by Agent VanBrunt. He was just a
18 receptacle.

19 THE COURT: Let's take the testimony on that very
20 quickly, and then Mr. Scotton can cross-examine him on it.

21 Agent, would you take the stand, please.

22 AGENT VANBRUNT: Yes, Your Honor.

23 ROY VANBRUNT, DEFENDANT'S WITNESS, SWORN

24 THE COURTROOM DEPUTY: Please state your full name and
25 spell your last name for the record.

1 THE WITNESS: My name is Roy VanBrunt,
2 V-A-N-B-R-U-N-T.

3 DIRECT EXAMINATION

4 BY THE COURT:

5 Q. All right. And, Agent VanBrunt, were are you employed?

6 A. I'm a special agent with the Federal Bureau of
7 Investigation assigned to the Miami Field Office.

8 Q. Sir, there's been an allegation made by Mr. Scotton that
9 Exhibit No. 1 was fabricated and the Exhibit No. 2 was also
10 fabricated. I would like to hand those to you. And if you
11 could just advise the Court on how you came into possession of
12 Exhibit No. 2 there, which is the March 29, 2012 letter.

13 A. Yes, Your Honor. If I can actually address Exhibit 1
14 first?

15 Q. You certainly can.

16 A. In the course of the investigation the Federal Bureau of
17 Investigation had requested a copy of Mr. Scotton's A-file.

18 Q. What's an A-file?

19 A. It's the immigration application file which contains
20 documentation of people's applications for change in their
21 status in the United States.

22 Q. All right. And did you receive that?

23 A. Yes, Your Honor, we did.

24 Q. All right.

25 A. In that A-file was the letter of which Defendant's Exhibit

1 No. 1 was the first page.

2 Q. On that Exhibit No. 1 there is a lot little blue ink
3 markings. Those were not contained on there or were they?

4 A. No, Your Honor. These -- Defendant's Exhibit 1, the
5 document that was in the A-file, did not contain any
6 handwriting or notations. It was an undated letter in the
7 A-file identified as USCIS 437 Bates number.

8 Q. All right. Thank you. What about Exhibit No. 2?

9 A. Exhibit No. 2 is the first page of a document that I
10 received from a US Citizenship and Immigration Services
11 immigration officer. I believe his first name was Yasser,
12 Y-A-S-S-E-R, last name Naverette, N-A-V-E-R-E-T-T-E.

13 Following Mr. Scotton's hearing in front of Magistrate
14 Snow there was a question as to whether the document identified
15 as Defense Exhibit 1 had actually been sent out or was a draft.
16 I contacted US Citizenship and Immigration Services and asked
17 for them to confirm to me the status of the decision. A few
18 business days later they provided me with what has been
19 identified as Defendant's Exhibit No. 2. I provided that to
20 AUSA Mitrani who then I believe attached it as an exhibit to
21 the documents as part of the bond detention hearing in front of
22 Judge Williams in Miami.

23 THE COURT: All right. Thank you.

24 Ms. Mitrani, did the government have any other
25 questions for the agent before I turn it over to Mr. Scotton?

1 MS. MITRANI: No, Your Honor.

2 THE COURT: Mr. Scotton, do you have any questions for
3 the agent?

4 THE DEFENDANT: Yes, I do.

5 THE COURT: Go ahead.

6 CROSS-EXAMINATION

7 BY THE DEFENDANT:

8 Q. Mr. Agent VanBrunt, I seen on your report you spoke to
9 immigration Agent Fred Brooks?

10 A. Yes, sir.

11 Q. Right. And he claimed to you that recent I change my
12 status, my marital citizen of the United States. It's in the
13 report. So do you have the report?

14 MS. MITRANI: Wait, Your Honor. I didn't even
15 understand the question. I couldn't hear it.

16 THE COURT: Sir, Mr. Scotton, I don't understand the
17 question either. The inquiry is related to these two exhibits
18 that we have.

19 THE DEFENDANT: I have to go through the whole
20 scenario here because the letter is going to show up. So he
21 wrote report, on his report that he spoke to -- on the
22 telephone -- they have some kind of phone conversation with
23 Fred Brooks, and Fred Brooks advised him the recent I have
24 entered into a marriage. I have a marriage of citizenship.

25 THE COURT: Sir, but we're not addressing the issue of

1 alleged --

2 THE DEFENDANT: But, Your Honor, I have to do, Your
3 Honor.

4 THE COURT: No, sir, you don't have to. What you have
5 to do is confine your cross-examination to the area of the
6 direct examination. The reason that the agent is on the stand
7 is because Exhibits 1 and 2 were introduced by you.

8 Are you listening to me, Mr. Scotton?

9 THE DEFENDANT: Yes.

10 THE COURT: All right. You introduced documents 1 and
11 2. You made the claim that they were fabricated by the
12 government and that they were false documents. The agent has
13 just testified exactly how he received Exhibit 1 and how he
14 received Exhibit 2. He's explained that Exhibit No. 1 was
15 contained in the A-file that was present at your detention
16 hearing and Exhibit No. 2 was received from a named official of
17 the Citizen Immigration and Citizenship agency.

18 Your inquiry, your cross-examination needs to go to
19 those two areas. Otherwise I'm not going to permit you to
20 cross-examine the agent. So if you would like to cross-examine
21 him about these allegations you have made. You made very
22 serious allegations, Mr. Scotton.

23 THE DEFENDANT: Yes.

24 THE COURT: You make very serious allegations that
25 this agent and this prosecutor have fabricated these two

1 documents. I put the agent on the stand. The agent has denied
2 that. Now I'm giving you the opportunity to question him about
3 how you allege that he fabricated these two documents. And
4 that's all I would like you to question him on. This is not a
5 trial of the entire case. So please confine your
6 cross-examination to the direct examination area and to why it
7 is that those two documents are claimed by you to be
8 fabricated.

9 BY THE DEFENDANT:

10 Q. Agent, do you have the name of the agent that have provided
11 that letter from ICE, the first letter, the draft letter?

12 A. My understanding is the draft that's been identified as
13 Defendant's Exhibit 1 was prepared by Fred Brooks.

14 Q. So Fred Brooks also has provide the draft letter?

15 A. My understanding is Defendant's Exhibit 1 was drafted by
16 Fred Brooks. Defense Exhibit 1 was part of the A-file that was
17 produced by the agency.

18 Q. And Fred Brooks provided you a draft without his name or
19 date?

20 A. The -- Mr. Brooks did not provide Defendant's Exhibit 1 to
21 me directly. I was provided with the A-file and contained in
22 the A-file, which was maybe 100 or 200 pages, contained in that
23 file was this letter.

24 Q. And why Mr. Fred Brooks present the draft to you?

25 A. Mr. Brooks did not present a draft to me. I was provided

1 with the A-file and contained in the A-file was the draft.

2 Q. If I understand from prosecuting court, she's saying that
3 she just received the file in court. So you guys received the
4 file in court or Fred Brooks has sent to you?

5 A. I don't understand the question, sir.

6 Q. Why Brooks wrote the letter? Why did he write the letter
7 to you, the draft?

8 A. I don't understand. He did not write a draft to me. He
9 was the hearing officer who supervised and conducted the
10 immigration adjustment hearing of Mr. Scotton and his -- a
11 female named Eileen Molanato. And based on Mr. Brooks' having
12 been the hearing officer, my understanding is that's why he
13 wrote this draft.

14 Q. How do you know that he wrote the draft?

15 MS. MITRANI: Objection, Your Honor. It has gone
16 behind the scope of direct. The agent -- it has already been
17 asked and answered.

18 THE COURT: Agent, you indicated that Exhibit No. 1,
19 Defendant's Exhibit No. 1 was contained in the A-file?

20 THE WITNESS: Yes, Your Honor.

21 THE COURT: Do you know from your own personal
22 knowledge whether Mr. Brooks wrote that letter or not?

23 THE WITNESS: I was told by Yasser Naverette who had
24 prepared the document identified as Defendant's Exhibit 1.

25 THE COURT: 1 or 2?

1 THE WITNESS: Yasser Naverette told me he prepared
2 Defense Exhibit 2.

3 THE COURT: Okay.

4 THE WITNESS: And Mr. Naverette also advised me that
5 Fred Brooks prepared Defendant's Exhibit 1.

6 THE COURT: All right. Thank you. I think that
7 clears it up.

8 Any further questions, Mr. Scotton?

9 BY THE DEFENDANT:

10 Q. You're just saying that Fred Brooks the one who prepared
11 the draft, and now you're saying somebody else prepared the
12 draft?

13 A. No, that is not my testimony.

14 Q. So if Fred Brooks has some familiar with my case and he's
15 the one that interview me, did you ask him the question why the
16 address on the draft is completely different from my address?

17 THE COURT: Mr. Scotton, I don't believe the agent has
18 testified that he spoke to Mr. Brooks. I think what he
19 testified to is he spoke to Mr. Naverette who advised this
20 agent that it was Mr. Naverette who prepared Exhibit No. 2 and
21 Mr. Brooks had prepared Exhibit No. 1. So I think your
22 question is not understanding what the testimony has been. So
23 if you want to try and rephrase it.

24 THE DEFENDANT: Okay, Your Honor.

25

1 BY THE DEFENDANT:

2 Q. How did you receive this draft from Fred Brooks? Fax,
3 e-mail?

4 MS. MITRANI: Your Honor, asked and answer.

5 BY THE DEFENDANT:

6 Q. Mailed to you?

7 MS. MITRANI: Asked and answered.

8 THE COURT: It is asked and answered, but I'll let the
9 agent answer one more time.

10 THE WITNESS: The document that's been identified as
11 Defense Exhibit 1, which we've described as the draft, was
12 included in the A-file that was produced in its entirety by the
13 US Citizenship and Immigration Services to the FBI in the
14 course of our investigation.

15 THE COURT: Mr. Scotton, any more questions?

16 BY THE DEFENDANT:

17 Q. And the file was delivered to you guys on March 29?

18 A. No. The file was provided to me during the course of our
19 investigation which was before we had even obtained an
20 indictment.

21 Q. Okay. So then was claimed in court that day that you guys
22 just received the file and now you say it was before the
23 indictment? It is in the transcription of court when the
24 prosecutor say I just receive in my hand here a draft, as you
25 guys call, from this letter. But now you claim they receive

1 way before the indictment, this draft of this letter?

2 A. I don't recall what was said in that bond hearing that
3 you're referencing, but I can tell you that we had acquired the
4 A-file before the time that the indictment was returned and you
5 were arrested.

6 Q. So you received this letter, draft letter before I was
7 arrested?

8 A. Correct, because it was part of the A-file.

9 Q. Right. And then Fred Brooks cannot present to you the
10 letter with the denial of March 31. So he present you a letter
11 that has no date, no signature, and nobody's name with a
12 different address. So he cannot present you months ago with
13 the real letter. So he have to present a complete empty
14 letter.

15 MS. MITRANI: Objection.

16 THE COURT: That is sustained. That's an improper
17 question, Mr. Scotton.

18 Do you have any further inquiry you would like to make
19 of this agent on these limited issues?

20 THE DEFENDANT: Your Honor, I'm just trying to get on
21 the bottom of the whole. You know, I appreciate the Court has
22 the patience. I'm not a lawyer, you know, and I'm trying to
23 get on the bottom of this letter here because agent claim they
24 received this letter way before and doesn't make any sense why
25 they going to draft a letter without anybody's signature and

1 date and my address that is not my current address on the
2 letter, then two days after the hearing they come up with the
3 other letter that is the real letter.

4 THE COURT: Okay. Well, it may not make any sense to
5 you, Mr. Scotton, but that's the testimony, and the agent has
6 testified he's not fabricated anything whatsoever, that he
7 received the A-file and that he then received Exhibit No. 2.

8 So if you have any other questions on that limited
9 area, not your suspicions but any other questions that you have
10 of this agent about those two documents, now is your time to
11 ask them.

12 BY THE DEFENDANT:

13 Q. When did you receive the letter that has the date March 31?

14 A. My recollection is that I received the letter that's been
15 identified as Defendant's Exhibit 2 two, maybe three business
16 days after the date of our hearing before Magistrate Snow.

17 Q. Okay. During the hearing you testified and my immigration
18 lawyer as well, correct?

19 A. I did testify at your detention hearing before Magistrate
20 Snow, yes.

21 Q. And you relied on unsigned letter, on the letter on that
22 date?

23 A. I'm sorry. I don't understand that.

24 Q. You relied on an unsigned, undated letter that date?

25 A. I don't know what you mean by "relied." I mean, it was

1 discussed. It was raised to Magistrate Snow's attention. I'm
2 not sure what you mean by "relied."

3 Q. You know it's not signed, the letter, right?

4 A. Correct. The letter is not signed nor is it dated.

5 Q. You know at the time it was not signed?

6 A. At the time that I testified, correct.

7 Q. My lawyer also has testified that she never received the
8 letter either, and she also has stated to Judge Snow she had
9 never saw such a thing unsigned and undated.

10 A. Correct. My recollection is that at the hearing
11 Mr. Scotton's immigration attorney, whose name is Rihab,
12 R-I-H-A-B, Hamade, H-A-M-A-D-E, also testified, and part of her
13 testimony included the fact that as Mr. Scotton's immigration
14 attorney she had not received any notice of decision from the
15 agency.

16 THE COURT: All right. Thank you.

17 Mr. Scotton, do you have any other areas of inquiry on
18 this matter here?

19 THE DEFENDANT: Okay. On response from the government
20 here I'm trying to understand it, Your Honor, why they attached
21 this letter from immigration. It came from Washington, DC, on
22 my appealing April 29, 2013.

23 THE COURT: That's not a proper question for the
24 agent. That's not a proper question for this agent.

25 We're dealing here with Exhibit 1 and 2. Do you have

1 any other questions that deal with Exhibits 1 and 2?

2 THE DEFENDANT: No, Your Honor. I guess not.

3 THE COURT: All right. Thank you.

4 Ms. Mitrani, did you have any questions?

5 MS. MITRANI: Yes.

6 BY MS. MITRANI:

7 Q. Agent VanBrunt, in advance of the detention hearing had you
8 been in communication with USCIS?

9 A. Yes.

10 Q. Had they advised that they were going to be denying the
11 defendant's I-485 application?

12 A. Yes.

13 Q. Okay. And did you rely on that as you testified in the
14 detention hearing?

15 A. Yes.

16 Q. Do you remember whether that letter was something that was
17 featured prominently in the hearing or was that something that
18 was mentioned at the very end of the hearing if you remember?

19 A. My recollection is that it was one of many different issues
20 raised during the hearing.

21 MS. MITRANI: No other questions.

22 THE COURT: All right. Thank you very much.

23 Agent, you may step down.

24 THE WITNESS: Thank you, Your Honor.

25 (Witness was excused.)

1 THE COURT: Let me have those two exhibits passed up
2 here, please. Thank you.

3 All right. And based upon the testimony I've heard,
4 I'm going to make a finding that Defendant's Exhibit 1 and
5 Exhibit 2 were not fabricated by the government, by
6 Ms. Mitrani, or by the US Attorneys Office, or by Agent
7 VanBrunt, or by the FBI, and that there's no support for the
8 allegation of the defendant that the government engaged in any
9 misconduct or any fabrication of these two letters.

10 Now, Mr. Scotton, your motion to dismiss indictment,
11 which is at 178, and to remove Ms. Mitrani from the case and
12 the agent from the case, do you have anything that you would
13 like to add? I read the motion and read the government's
14 response. Anything else that you would like to add on that
15 motion?

16 THE DEFENDANT: What can I say more, Your Honor?
17 Because, you know, it doesn't look like anything that I say to
18 this Court has any weight. They present false papers. They
19 intimidate all of my witness, my family. I file a motion and
20 the Court denies. So what should I say to the Court at this
21 point?

22 THE COURT: Well, Mr. Scotton, I'll leave that up to
23 you. All I can tell you is we set a hearing down in this
24 matter because we wanted to address the arguments that you
25 raised. You know, you make very serious allegations and yet I

1 don't see any proof at all for those allegations. You made
2 very serious allegations as to Defendant's 1 and 2.

3 THE DEFENDANT: Your Honor, I filed a motion.

4 THE COURT: Let me finish. You made very serious
5 allegation as to Defendant's 1 and 2, that the government
6 prosecutor and the agent fabricated these two documents.

7 The agent has been on the stand under oath, you've had
8 a chance to cross-examine him, and there's absolutely no
9 evidence whatsoever that these documents have been fabricated
10 other than the suspicions that come out of your mouth.

11 Now, you're entitled to your own suspicions, sir, but
12 this Court rules on evidence, not on what you have to say. It
13 rules on evidence.

14 THE DEFENDANT: Exactly, Your Honor.

15 THE COURT: And that's what you don't seem to have any
16 of. So what I was trying to ask you is -- we've gotten through
17 those issues. I was trying to see if there were any other
18 issues you wish to address regarding Docket Entry 178 and why
19 it is that the indictment should be dismissed and Ms. Mitrani
20 and Agent VanBrunt should be removed from the prosecution of
21 you.

22 THE DEFENDANT: Your Honor, I filed those motions. I
23 never receive any comment from the Court. I never receive any
24 scheduled date that I'm going to have a hearing that I can at
25 least bring the witness that can come and testify and confront

1 that the letter is fabricated. I should be able to have two
2 immigration lawyers in this court today if I know that I have a
3 hearing set up today for this. I be able to have an ex-INS
4 immigration agent also to testify on that behalf.

5 So this Court has eliminated any way for me to defend
6 myself, because I'm sitting in jail. I file a motion. The
7 next thing I know I gotta transfer from one place to another.
8 I have no idea what I'm going to do here next. I don't have
9 way to bring my witness to court.

10 I'm indigent. I don't have any money to spend over
11 this. So what do you want me to say? The motion speak for
12 themself. The documentation that I make to this Court, you
13 know. And I have done my homework. That's not the first time
14 that this agent, this prosecutor has committed misconduct.
15 There's cases that I know they have done things like that
16 before. I have a lawyer that can come testify. They told me
17 if they have to they testify on behalf of this. There's a case
18 (unintelligible). They done a lot of fraud in that case. They
19 lost the case.

20 THE COURT: It's a case what?

21 THE DEFENDANT: It's a case United States vs Mike
22 (unintelligible). The agent was involved.

23 THE COURT: I'm not understanding what you're saying,
24 sir. USA vs what?

25 THE DEFENDANT: Michael Lauer.

1 THE COURT: Do you know how to spell that?

2 THE DEFENDANT: I think it's spelled like L-E --

3 THE COURT: So there's a case USA vs Michael Lauer.

4 And what about that case?

5 THE DEFENDANT: VanBrunt is part of the case and they
6 lost the case of misconduct of them fabricating papers on it.

7 THE COURT: What does that have to do with this case?

8 THE DEFENDANT: Your Honor, I'm trying to present here
9 as much as I can in my power, and it doesn't look like I have a
10 lot of power here for sure. Because I'm very limited what I
11 can do. I don't have a lawyer at this point. I cannot bring
12 my witness. I don't know when I have a scheduled hearings has
13 been scheduled. The Courts do not communicate with me to let
14 me know you need to bring your witness or you have a court
15 date.

16 I have no idea that I even have a court date today,
17 Your Honor. If I know I have a Court date, all of my witnesses
18 would be sitting here today testifying on this behalf, on all
19 this matter, on all this misconduct and intimidation here.

20 Every single witness that I try to contact here keep
21 receiving visitations. Every person from my family that we
22 trying to ask help or even raise money for my legal fees, they
23 have been intimidated.

24 That's why I need the investigator. I need to start
25 getting some help here so I can get this case prepared for

1 trial.

2 THE COURT: Well, we're going to deal with the motion
3 for the investigator. We were going to deal with that first,
4 but you indicated that you wanted to do that on an ex parte
5 basis. So as soon as we finish these other motions, we're
6 going to deal with the motion for --

7 THE DEFENDANT: We're going to have to set up another
8 hearing for that motion so I can have my witnesses here to
9 testify.

10 THE COURT: What witnesses would you have to testify,
11 sir?

12 THE DEFENDANT: I have two immigration lawyers and I
13 have one agent from immigration.

14 THE COURT: And how long would it take you to get
15 those witnesses available, sir?

16 THE DEFENDANT: Your Honor, as soon as I able to get a
17 phone and contact them.

18 THE COURT: Well, the reason, you know, your
19 proceeding as you have is well documented in the court record
20 as to why, you know, you've given up your right to counsel.
21 Because you've been through so many lawyers and fired so many
22 lawyers, sir, that you're now proceeding pro se. So the fact
23 that you're incarcerated and the fact that you don't have a
24 lawyer is really -- certainly the fact that you don't have a
25 lawyer is really your own fault, sir. So I'm not going to

1 listen to those times of arguments.

2 But if you can tell me exactly who you would be
3 calling at an evidentiary hearing and what you would seek to
4 establish, I'll consider that.

5 (Defendant and standby counsel conferring sotto voce.)

6 THE DEFENDANT: Well, on that I'm going to -- I need
7 to also have a sealed hearing on that, Your Honor. I'm not
8 going to disclose any more names because every single time
9 names have been disclosed and people keeping getting
10 intimidated.

11 THE COURT: Here's what I'm going to do. On the
12 Defendant Rogerio Scotton's motion to dismiss the indictment,
13 to remove Prosecutor Mitrani from the case and to remove Agent
14 VanBrunt from the case, I've heard not a scintilla of evidence
15 that would support the allegations made in the motion.

16 I'm going to deny the motion or enter an R & R, Report
17 and Recommendation, recommending that the motion be denied as
18 far as the motion to dismiss the indictment and also deny the
19 request to remove Ms. Mitrani from the case and remove Agent
20 VanBrunt from the case.

21 The defendant is always free to investigate the matter
22 further. And if you come up with some evidence that you can --
23 that you believe supports your allegations rather than mere
24 allegations, the defendant is free to file a subsequent motion.
25 And if it calls for an evidentiary hearing, I'll be very happy

1 to schedule an evidentiary hearing and to listen to your
2 witness, Mr. Scotton, and to listen to any witnesses from the
3 government. But what the Court doesn't do is just rely on
4 unsupported allegations. And that's all that we have from you
5 in this case, unsupported allegations.

6 And so I'm going to deny that motion, but you
7 certainly may file any motion in the future if you believe that
8 you have evidentiary support for that motion. And if you're
9 entitled to an evidentiary hearing, then certainly the Court
10 will give you an evidentiary hearing. If you're not entitled
11 to it after the Court reviews everything, then you won't have
12 an evidentiary hearing.

13 Now, the last motion before we go to the ex parte
14 matter is the motion for reasonable bond for a defendant
15 indigent and pro se. That's Docket Entry No. 157.

16 And I do know Mr. Scotton and I've reviewed the file.
17 Do you have that motion there with you, sir?

18 THE DEFENDANT: I don't think so, Your Honor. I think
19 it's at FDC.

20 THE COURT: It's the motion for reasonable bond and
21 for a defendant indigent and pro se.

22 THE DEFENDANT: Your Honor, that motion has been
23 almost a month and a half ago that I sent to the Court.

24 THE COURT: It was filed September 18, 2013.

25 Let me just -- before we have you address that motion,

1 I'll make a finding from my review of the records that the
2 defendant was detained on March 29, 2012, by Magistrate Judge
3 Snow on the basis of risk of flight, and that was at Docket
4 Entry 15. That hearing lasted -- that detention hearing lasted
5 for over an hour. A written order of detention was issued.
6 And that's at Docket Entry 16. And then the defendant objected
7 to pretrial detention. That's at Docket Entry 26.

8 And then thereafter the matter went before Judge
9 Williams and Judge Williams gave some very precise rulings as
10 to what would have to be presented by Mr. Scotton in order for
11 there to be any possibility of pretrial release in this case.
12 And that's found at Docket Entry 42, Pages 16 to 17. That was
13 a May 10, 2013, hearing before Judge Williams.

14 Thereafter, on August 28, 2012, Judge Rosenbaum, to
15 whom the case had been reassigned, denied the defendant's
16 petition for review of the magistrate judge's detention order
17 denying bond and granting the government motion for pretrial
18 detention. And that's found at Docket Entry 63.

19 So you now have filed a motion for reasonable bond.
20 And let me hear from you, Mr. Scotton, as to why this matter
21 hasn't already been fully addressed previously by prior judges
22 and why it should be readdressed at this point.

23 THE DEFENDANT: Because the -- Judge Williams have
24 mentioned some kind of people come and sign. She never post
25 any bond or some kind of amount or how much it would be. And I

1 understand it needs to be reasonable because, as I have point
2 out to the Court, the last lawyer has introduced us to a
3 bondsman that has stole \$60,00 from us. Now the bondsman, as
4 the Court also know, has been arrest and he is out on a bond.
5 So it's kind of even goofy to even say that. My bondsman is
6 out on a bond. So we don't have any more money.

7 You know, I can't rely on my family because they
8 depend on me. So I'm trying to do here is be able to have a
9 fair trial. At this point I have not really see that I'm going
10 to have a fair trial.

11 So reasonable bond and condition, house arrest,
12 whatever it is. My family willing to sign the little
13 condominium that they have. They're willing to sign on my
14 behalf.

15 I'm ask for this Court just to grant my bond that I
16 can be able to prepare for this trial. Even so far maybe I try
17 to raise money to retain a lawyer that can help me with this
18 case.

19 THE COURT: All right. Anything else that you wanted
20 to add on the motion for bond?

21 THE DEFENDANT: No, Your Honor.

22 THE COURT: All right. Any response from the
23 government?

24 MS. MITRANI: Your Honor, this matter has been well
25 litigated. Needless to say, the government objects to any

1 bond. It has been considered and reconsidered. Nothing has
2 changed that would warrant a reconsideration of this issue.

3 THE COURT: All right. The Court's going to deny the
4 defendant's motion for reasonable bond and for a defendant
5 indigent and pro se.

6 There's been a long history in this case of the
7 defendant moving for bond. And that's been in front of Judge
8 Snow, it has been in front of Judge Williams who specifically
9 laid out some of the factors that she would want produced by
10 the defendant or guarantees by the defendant in order for there
11 to be any consideration of release, and then the motion for
12 review of Judge Snow's order was denied by Judge Rosenbaum.
13 And there's really nothing new in this motion that would cause
14 the Court to make any changes.

15 So the Court is going to go ahead and deny the motion
16 for reasonable bond and for a defendant indigent and pro se
17 which is Docket Entry No. 157.

18 Now, that's going to leave us with the last motion
19 which is the motion for an investigator. And that's something
20 that I think, Mr. Scotton, you wanted to discuss pro se; is
21 that right?

22 THE DEFENDANT: I have a motion here that I need to
23 have a continuance on the trial.

24 THE COURT: That motion will be handled by Judge
25 Rosenbaum. I know that's part of one of the motions that you

1 filed here.

2 THE DEFENDANT: That's correct.

3 THE COURT: Right. It's part of Docket Entry 178,
4 defendant's motion to continue trial for cause. That's a
5 motion that Judge Rosenbaum will handle. You can make any
6 requests for a continuance of the trial to her. However, I've
7 noted in the file that there's numerous motions that you filed
8 to dismiss on speedy trial grounds and yet now you're making
9 numerous motions to continue the trial. So I don't know how
10 that syncs up, but that's certainly up to you to decide how you
11 want to handle that.

12 I will tell you that as of right now I believe -- and
13 counsel can correct me if I'm wrong, but your calendar call is
14 set for October 30, 2013, at 1:00 p.m., and your trial date is
15 scheduled to begin during the two-week period starting
16 November 4, 2013. So you have a calendar call in front of
17 Judge Rosenbaum at 1:00 p.m. on the 30th of October, and then
18 you have a trial that could start as early as November 4th.

19 I also believe that there may be a hearing scheduled
20 for Monday in front Judge Rosenbaum on --

21 Do you know what matter that is, Ms. Mitrani?

22 MS. MITRANI: Yes, it's on the government's motion to
23 admit subject to relevance business records under 902(11).

24 THE COURT: What time is that?

25 MS. MITRANI: I think it's 11:00. It's in the

1 morning. I think it's 11 o'clock in the morning, 11:15.

2 THE COURT: 11:15? Okay.

3 So, Mr. Scotton, you also have a motion on -- is that
4 on Monday you said?

5 MS. MITRANI: Yes, sir.

6 THE COURT: On this coming Monday, Mr. Scotton, you
7 also have a motion in front of Judge Rosenbaum dealing with
8 what Ms. Mitrani just indicated.

9 And any motion for a continuance of the trial you're
10 going to have to address to Judge Rosenbaum.

11 Do you understand?

12 THE DEFENDANT: Yes, sir.

13 THE COURT: All right. Ms. Mitrani, is there anything
14 else that you need to bring up today?

15 MS. MITRANI: Your Honor, I don't know if this is
16 something that Court can address, but as the Court has pointed
17 out this defendant makes very serious allegations against, you
18 know, the government, against the FBI, against myself, he
19 mentions us by name, the record is riddled with these
20 allegations. You know, I don't know how to prevent that from
21 happening. It's unethical. I understand he's not an attorney.

22 But actually, Your Honor, and I think I mentioned one
23 of those, the government would move to strike all of these
24 pleadings. Not the Brady pleading necessarily, but the other
25 two from the public record because the allegations are so

1 scurrilous.

2 THE COURT: All right. And I understand that. I am
3 going to deny the motion to strike.

4 But, Mr. Scotton, you have made repeated allegations
5 of misconduct in this case. And I can tell you that this Court
6 takes allegations of misconduct very seriously, very seriously.
7 However, sir, when you make these repeated allegations and you
8 have absolutely no proof to back them up, it causes concern to
9 the Court and it also causes concern that you're just making
10 baseless, frivolous allegations in this case.

11 And so all I can tell you, sir, is that any
12 allegations that you make should be supported by evidence, not
13 by simply innuendo or suspicion on your behalf. And you're
14 certainly free to file whatever motions you want. You're
15 representing yourself in this case, and you can represent
16 yourself as you deem fit.

17 However, nobody really has the right to make false
18 allegations against somebody else. And so what I would caution
19 you, sir, is if you are going to make any type of allegations,
20 that you please support them with some evidence, some
21 affidavit, some witness that would corroborate what it is that
22 you're saying rather than your own words.

23 Do you understand that, Mr. Scotton?

24 THE DEFENDANT: Yes, I understand, Your Honor. But I
25 need the Court also to understand informing me when I'm going

1 to have a hearing that I can at least contact my witness to
2 have them present to be able to backing up all of my
3 allegations, because my allegations are not false allegations.
4 And I intend to appeal all the motions. And I'm going to go
5 ahead and bring my witness if I'm being informed of when I'm
6 going to have another hearing.

7 THE COURT: Well, any hearing that the Court sets is
8 always -- there's always a notice of hearing that is filed. A
9 notice of hearing always goes out. I know you have standby
10 counsel. They would receive notices of those hearings
11 electronically. And any other notices that go out would go out
12 either electronically or by mail depending on how those notices
13 go out. So you should be receiving notice of every hearing in
14 this case. And all you have to do is stay vigilant and I'm
15 sure you will be able to deal with that.

16 And when you make a motion like that, you can expect
17 there to be a hearing. When you make a motion, you know,
18 containing a serious allegation, sir, the Court wants to get to
19 the bottom of it. And you made an allegation, for example, on
20 these two exhibits that you introduced, that they were false
21 and fabricated, that the agents fabricated them, and the
22 testimony shows that's absolutely not true, sir.

23 THE DEFENDANT: Well, Your Honor --

24 THE COURT: So I just get concerned when you make
25 allegations and then when the evidence comes out that doesn't

1 support your allegations, sir, that I don't understand why
2 you're doing it. You certainly have a right to do that if you
3 want to, but I don't understand why you're doing that.

4 THE DEFENDANT: Your Honor, with all due respect to
5 the Court, my allegations stand and I say the letters was
6 false, yes, was false. My witness has been intimidated. They
7 have been intimidated. I'm going to appeal all of the motions
8 because I'm going to bring all of the proof that I can support
9 my allegations here.

10 So the problem here that I don't have my parents here
11 to testify and I have no any individuals here because I have no
12 idea that I was here in West Palm Beach for.

13 As far as I understand from information from even FDC,
14 I have a new magistrate and the magistrate is Patrick Hunt and
15 I should have been going to Broward for that matter. So when
16 they brought me here to West Palm Beach, I have no idea what I
17 was here for.

18 I have not been able to contact anybody because, as
19 you know, I'm not have any more money. So phoning here in the
20 jail cost money. I cannot make any calls. So that's why I
21 need to find a way to get the Court to communicate also with
22 me, to let me know when I'm going to have a next hearing so
23 that I can find a way to contact the people for them to come
24 here and bring all of my evidence that I need to.

25 THE COURT: All right. And the Court always does

1 that. The Court will always notify you of any hearings.

2 All right. So that resolves the matters. Is there
3 anything else, Ms. Mitrani?

4 MS. MITRANI: One last thing. As a courtesy to
5 Mr. Scotton, Docket Entry 183 is the subject of Monday's
6 hearing. We served it by mail. I don't know if he's going
7 back to FDC or not so I am going to hand it to Mr. Kreiss so he
8 can hand it to him.

9 THE COURT: All right. Mr. Scotton, Ms. Mitrani is
10 handing you Docket Entry 183.

11 MS. MITRANI: Yes, Your Honor.

12 THE COURT: Thank you, Ms. Mitrani. And what that
13 document entry is is the subject of the hearing that you have
14 before Judge Rosenbaum on Monday.

15 All right. Thank you for that, Ms. Mitrani.

16 What I'm going to do then is I'll excuse the
17 government and I'm going to go ahead and go into the sealed
18 ex parte hearing regarding the defendant's motion for
19 appointment of an investigator.

20 MS. MITRANI: Thank you, Your Honor.

21 THE COURT: Thank you.

22 MS. MITRANI: We don't have to come back, correct?

23 THE COURT: No, not at all.

24 MS. MITRANI: Thank you, sir.

25 THE COURT: Have a good afternoon.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MS. MITRANI: Thank you.

...

C E R T I F I C A T E

I, Karl Shires, Registered Professional Reporter and
Federal Certified Realtime Reporter, certify that the foregoing
is a correct transcript from the record of proceedings in the
above-entitled matter.

Dated this 8th day of February, 2014.



Karl Shires, RPR FCRR

\$	26 [2] 37/14 81/7	87/2 87/15 88/18	45/23 46/9 46/10 47/3
27 [2] 22/16 26/1	27 [2] 22/16 26/1	above-entitled [1]	47/4 48/10 48/16 48/22
\$60,00 [1] 82/3	28 [9] 11/9 14/8 18/17	90/8	49/21 53/12 53/16
-	22/16 23/15 23/16	Abreu [2] 9/10 9/11	58/11 59/23 61/3 61/5
-v [1] 1/6	24/17 26/1 81/14	absolutely [4] 34/24	61/7 61/12 61/17 61/21
0	28-1 [1] 25/1	75/8 86/8 87/22	62/5 62/6 63/25 64/3
0001 [1] 19/13	29 [20] 11/8 13/4 13/6	abundance [1] 5/9	64/8 64/9 65/6 65/12
0014 [1] 19/13	13/7 13/9 13/25 20/4	accept [1] 60/23	65/20 65/25 66/1 66/1
1	21/25 22/1 22/16 26/1	accurate [2] 41/17	66/10 66/10 67/16
10 [1] 81/13	50/5 50/24 53/4 53/7	57/24	67/18 68/17 68/20 69/9
100 [1] 66/22	55/21 62/12 69/17	acquired [1] 70/3	70/19 70/23 71/5 71/10
11 [1] 84/23	72/22 81/2	acronym [1] 54/3	72/24 72/24 73/7 73/23
11 o'clock [1] 85/1	291 [1] 54/22	acts [1] 39/3	74/6 74/12 75/6 75/7
11:00 [1] 84/25	29th [1] 49/20	actual [1] 23/12	75/20 76/4 76/14 76/22
11:15 [2] 85/1 85/2	2:57 [1] 1/9	add [8] 4/18 7/6 16/18	78/13 79/13 79/19
12-60049-CR-KMW [1]	3	17/14 37/21 74/13	agents [11] 7/5 32/12
31/12	30 [1] 84/14	74/14 82/20	32/16 34/14 43/8 43/9
12-60049-CR-ROSENBAUM [2]	30th [1] 84/17	addition [1] 37/21	43/24 45/6 45/8 58/25
1/2 31/15	31 [21] 11/8 13/5	additional [1] 27/19	87/21
12-60049-CR-Rosenbaum/Matthews	13/12 14/8 22/4 26/2	additionally [2] 25/3	ago [9] 4/24 10/5 12/3
3/6	49/14 50/1 50/6 52/16	34/20	14/16 14/22 24/22
13 [2] 26/13 29/4	54/19	address [42] 33/16	45/11 70/12 80/23
15 [1] 81/4	55/21 55/22 56/17 58/2	34/11 35/15 35/16	agree [1] 31/21
157 [2] 80/15 83/17	58/7 61/2 70/10 71/13	37/25 50/11 50/13	ahead [18] 3/3 3/7
16 [4] 26/21 26/22	3100 [1] 51/16	50/15 50/17 51/3 51/11	3/21 4/15 13/22 16/24
81/6 81/12	31st [1] 54/13	51/12 53/22 53/23	24/6 28/5 28/15 40/16
1617 [1] 33/6	33301 [1] 1/18	54/11 55/7 55/8 57/14	44/4 47/9 54/10 59/13
164 [2] 26/10 28/25	33316 [1] 1/21	57/15 57/18 57/19 58/2	64/5 83/15 87/5 89/17
17 [1] 81/12	33401 [1] 1/25	58/14 59/3 59/3 59/7	Alicia [1] 41/20
170 [2] 3/24 4/9	3728 [1] 1/24	59/7 59/8 60/11 60/13	allegation [15] 7/19
178 [4] 48/11 74/11	4	60/21 62/13 68/16	7/25 15/25 22/20 42/7
75/18 84/3	42 [1] 81/12	68/16 70/12 71/1 71/1	46/7 48/7 58/10 60/7
18 [1] 80/24	437 [4] 22/24 23/11	74/24 75/18 80/25	60/8 62/8 74/8 75/5
1824 [1] 1/21	51/1 63/7	85/10 85/16	87/18 87/19
183 [2] 89/5 89/10	485 [5] 10/2 10/14	addressed [4] 33/17	allegations [42] 5/24
185 [5] 4/13 5/6 16/18	11/1 11/9 73/11	49/16 51/2 81/21	12/23 20/9 39/13 39/18
23/17 24/7	4th [2] 1/21 84/18	addresses [1] 60/10	39/19 41/15 42/5 45/20
187 [4] 4/23 4/25	5	addressing [1] 64/25	46/25 47/6 47/6 47/7
26/15 29/2	500 [1] 1/17	Adelstein [1] 8/17	47/21 65/21 65/22
188 [3] 4/24 4/25	514-3728 [1] 1/24	adjust [2] 10/24 18/9	65/24 74/25 75/1 75/2
48/13	561 [1] 1/24	adjustment [1] 67/10	79/15 79/23 79/24 80/4
189 [12] 4/14 4/24	6	admission [1] 35/6	80/5 85/17 85/20 85/25
4/25 11/14 11/15 11/17	63 [1] 81/18	admit [4] 49/16 56/14	86/4 86/6 86/7 86/10
11/22 12/14 12/24	7	56/16 84/23	86/12 86/18 86/19 87/3
13/17 18/16 25/3	70-year-old [1] 32/19	admitted [1] 56/20	87/3 87/3 87/25 88/1
189-1 [1] 25/4	701 [1] 1/24	advance [3] 35/21	88/5 88/9
1:00 [1] 84/17	777 [1] 50/15	36/19 73/7	allege [2] 40/6 66/3
1:00 p.m [1] 84/14	7:30 [1] 35/25	advise [1] 62/11	alleged [3] 6/17 7/7
2	8	advised [4] 64/23 68/4	65/1
20 [4] 36/8 36/10 41/8	8th [1] 90/9	68/19 73/10	allegedly [3] 53/17
44/13	9	advising [1] 51/1	56/22 59/23
200 [1] 66/22	902 [1] 84/23	affidavit [12] 38/11	alleges [3] 10/1 10/14
2011 [1] 20/4	A	38/15 38/19 39/3 39/9	59/22
2012 [23] 11/8 13/9	A-file [31] 18/8 18/24	39/19 39/20 40/5 40/5	alleging [4] 8/20 16/7
14/8 22/1 29/22 30/13	22/24 51/22 51/24	40/10 40/11 86/21	38/16 39/3
30/18 30/22 31/13	51/25 52/4 52/20 52/25	affidavits [7] 40/16	allowed [1] 8/7
31/25 33/16 36/11	53/1 53/7 56/25 57/9	42/16 46/23 47/14	AMERICA [2] 1/4 3/5
49/14 50/1 53/7 53/11	58/6 61/1 62/17 62/18	47/16 47/18 47/22	amount [1] 81/25
56/17 58/2 58/7 61/2	62/25 63/5 63/7 65/15	afford [2] 47/17 47/19	and/or [1] 48/10
62/12 81/2 81/14	66/16 66/21 66/22 67/1	afternoon [8] 3/2 3/9	answer [5] 11/19 13/16
2013 [15] 1/8 13/25	67/1 67/19 69/12 70/4	3/12 3/14 3/15 3/17	58/15 69/4 69/9
21/25 29/23 30/14	70/8 71/7	3/19 89/25	answered [5] 36/1
30/17 31/15 32/1 33/18	able [13] 6/22 14/23	agency [3] 65/17 66/17	59/18 67/17 69/7 69/8
52/24 72/22 80/24	36/15 44/14 47/22 76/1	72/15	answering [1] 58/16
81/13 84/14 84/16	76/3 78/16 82/8 82/16	agent [85] 3/11 5/7	anybody [3] 5/15 8/24
2014 [1] 90/9		5/10 5/10 5/11 5/14	88/18
23 [1] 1/8		6/14 7/12 8/23 17/19	anybody's [2] 60/20
24 [1] 56/4		20/3 32/24 35/24 36/4	70/25
258 [1] 1/24		36/14 36/15 36/22	apologize [2] 17/13
		37/15 37/16 37/18 38/7	30/22
		42/23 42/25 43/22 45/5	apparently [2] 21/9
		45/11 45/13 45/22	39/15

A	attention [2] 55/15 72/1	83/4 83/7 83/16	16/3 21/6 21/20 22/2
appeal [7] 11/11 11/12 11/13 18/18 24/18 87/4 88/7	attesting [2] 38/16 40/6	bondsman [3] 82/3 82/3 82/5	22/2 22/3 22/3 22/13 22/13 22/13 25/9 25/21 25/21 25/21 25/25 26/1
appealed [2] 11/11 27/14	attorney [5] 1/17 52/10 72/11 72/14 85/21	boss [1] 33/1	26/3 26/6 26/7 26/20 27/5 31/4 31/11 31/12 31/14 31/14 32/21
appealing [23] 10/2 10/14 10/19 13/9 13/11 21/25 22/2 22/12 22/13 22/15 22/18 25/21 25/25 25/25 26/3 26/20 27/3 27/4 59/12 59/12 59/14 59/14 72/22	Attorney's [1] 53/16	bottom [6] 49/12 49/15 54/20 70/21 70/23 87/19	33/24 37/6 41/2 41/3 41/3 41/4 41/5 41/6 41/14 41/17 42/3 42/8 42/10 45/3 45/5 48/10 48/11 48/16 48/16 48/22 48/22 50/4 50/5 55/20 55/20 55/21 55/22 56/2 56/7 56/12 66/5 68/14 74/11 74/12 76/17 76/18 76/19 76/20 76/21 77/3 77/4 77/5 77/6 77/7 77/25 79/13 79/14 79/19 79/20 80/5 81/11 81/15 82/18 83/6 86/5 86/10 86/15 87/14
appear [1] 57/22	Attorneys [1] 74/6	box [5] 9/2 9/2 9/13 9/16 9/17	86/15 87/14
appearance [2] 37/8 37/17	August [9] 20/4 29/22 29/23 30/2 35/24 36/11 37/7 37/14 81/14	boxes [2] 9/17 9/19	cases [2] 41/23 76/15
appearances [2] 1/15 3/8	August 2013 [1] 29/23	Brady [21] 4/12 4/16	cause [2] 83/13 84/4
appeared [1] 37/15	August 26 [1] 37/14	Brazil [3] 7/13 14/20 14/22	causes [2] 86/8 86/9
appearing [1] 14/4	August 28 [1] 81/14	briefly [1] 34/23	caution [2] 5/9 86/18
appears [6] 17/6 24/2 34/14 38/1 49/14 58/1	August 29 [1] 20/4	bring [12] 16/21 28/11 30/15 47/12 75/25 76/9 77/11 77/14 85/14 87/5 88/8 88/24	cell [2] 8/3 8/5
application [8] 11/1 11/9 24/24 27/4 27/4 54/23 62/19 73/11	AUSA [1] 63/20	Brooks [20] 64/9 64/23 64/23 66/13 66/14 66/16 66/18 66/20 66/24 66/25 67/4 67/6 67/22 68/5 68/10 68/14 68/18 68/21 69/2 70/9	certain [2] 20/16 47/2
applications [1] 62/20	authorization [1] 3/23	Brooks' [1] 67/11	certainly [13] 26/5 28/2 36/3 39/21 48/19 58/24 62/15 78/24 80/7 80/9 84/10 86/14 88/2
applied [1] 10/24	available [1] 78/15	brought [1] 88/16	Certified [1] 90/6
apply [2] 57/12 60/11	avenue [6] 1/21 50/17 51/2 51/16 53/22 59/4	Broward [7] 1/17 7/18 8/2 8/22 8/24 18/1 88/15	certify [1] 90/6
appoint [2] 41/2 41/5	aware [2] 19/14 37/6	building [1] 60/19	chance [2] 54/9 75/8
appointment [1] 89/19	B	bunch [1] 32/14	change [4] 37/10 37/12 62/20 64/11
appreciate [1] 70/21	back [10] 18/17 30/3 30/24 32/4 38/4 41/6 47/24 86/8 89/7 89/22	Bureau [2] 62/6 62/16	changed [2] 37/9 83/2
April [5] 13/7 13/8 13/25 21/25 72/22	backing [1] 87/2	business [8] 35/5 35/7 36/14 44/7 45/2 63/18 71/15 84/23	changes [1] 83/14
April 29 [4] 13/7 13/25 21/25 72/22	badge [3] 32/19 36/3 36/16	by Mr. Colon's [1] 35/6	Chantel [2] 9/11 9/11
area [3] 65/5 66/6 71/9	badges [1] 32/12	C	characterization [1] 17/8
areas [3] 44/22 65/19 72/17	based [3] 42/7 67/11 74/3	calendar [3] 37/11 84/13 84/16	characterizing [1] 53/25
argue [5] 13/18 13/20 13/21 13/22 13/22	baseless [1] 86/10	call [21] 3/1 3/3 5/7 6/25 7/3 7/4 14/21 21/5 37/11 42/23 42/25 45/11 45/23 47/1 47/2 47/2 49/22 60/19 69/25 84/13 84/16	charge [1] 56/3
arguing [2] 29/4 34/14	basically [2] 14/15 36/5	called [4] 16/8 20/11 43/7 60/20	CHAVES [2] 1/7 3/5
argument [2] 26/6 29/10	basis [6] 40/7 42/18 46/24 47/20 78/5 81/3	calling [4] 3/4 33/1 33/3 79/3	check [2] 33/3 44/4
arguments [2] 74/24 79/1	Bates [3] 49/7 49/12 63/7	calls [2] 79/25 88/20	checks [4] 23/2 35/11 44/2 44/5
arm [2] 23/2 23/3	be -- strike [1] 19/2	capacity [1] 26/7	chief [1] 39/11
arrest [2] 82/4 82/11	Beach [6] 1/8 1/25 50/17 55/7 88/12 88/16	car [2] 44/3 44/9	China [1] 57/15
arrested [2] 70/5 70/7	bear [1] 47/7	card [1] 10/25	choice [1] 59/14
ascertain [1] 18/24	bearing [1] 47/6	carefully [1] 59/12	chose [1] 6/25
aside [1] 59/19	beginning [1] 9/15	Carlos [7] 32/23 33/16 33/17 33/18 33/19 38/15 42/16	church [1] 45/7
asked [11] 7/12 9/25 13/16 17/17 36/19 37/18 63/16 67/17 69/4 69/7 69/8	behalf [7] 3/10 33/2 76/4 76/17 77/18 82/14 86/13	cars [1] 44/8	citizen [3] 53/13 64/12 65/17
asking [10] 5/21 8/22 10/12 10/13 12/22 15/5 19/4 24/9 26/21 38/13	behavior [2] 33/10 45/15	case [105] 1/2 3/3 3/5 4/6 5/8 5/11 5/14 5/14 5/18 9/15 10/2 10/14 10/20 10/20 13/4 13/5 13/11 13/11 13/12 14/4	citizens [1] 32/21
assigned [2] 37/6 62/7	believe [17] 4/5 5/5 29/6 39/13 51/5 51/9 53/12 53/24 60/14 60/15 63/11 63/20 68/17 79/23 80/7 84/12 84/19	case [105] 1/2 3/3 3/5 4/6 5/8 5/11 5/14 5/14 5/18 9/15 10/2 10/14 10/20 10/20 13/4 13/5 13/11 13/11 13/12 14/4	citizenship [14] 13/24 18/19 24/25 25/4 49/11 49/14 51/17 53/21 60/25 63/10 63/16 64/24 65/17 69/13
Assistant [1] 1/17	BERTHA [2] 1/16 3/9		claim [12] 22/16 25/21 26/3 27/4 46/18 50/3 56/9 56/21 58/13 65/11 69/25 70/23
assisting [1] 5/18	better [2] 4/8 54/11		claimed [4] 57/3 64/11 66/7 69/21
assume [1] 55/2	bid [1] 18/9		clear [3] 35/3 36/25 52/14
assuming [2] 34/15 34/18	bills [1] 44/5		clears [1] 68/7
attached [12] 10/17 11/13 12/13 12/16 13/17 18/14 18/19 23/15 24/19 25/9 63/20 72/20	bit [1] 19/8		
attachment [1] 30/22	blind [1] 32/19		
attempted [1] 11/11	block [2] 8/4 8/5		
	blue [5] 9/4 9/4 50/16 59/5 63/2		
	bond [23] 10/11 13/9 27/22 50/19 55/13 55/24 56/1 63/21 70/2 80/14 80/20 81/17 81/19 81/25 82/4 82/6 82/11 82/15 82/20 83/1		

C	9/7 14/13 14/18 14/19 19/5 19/10 19/11 19/12 19/13 19/14 19/17 19/17 19/21 23/25	22/22 23/2 23/18 23/21 24/19 25/1 25/15 25/16 27/9 27/23 28/12 29/21 29/24 30/4 30/11 30/12 31/18 34/10 37/5 38/21 40/6 40/8 40/13 40/17 40/17 40/19 40/25 41/14 42/3 42/14 42/16 42/17 42/19 45/19 46/24 46/25 47/15 47/17 47/19 48/17 49/1 49/5 49/20 50/5 51/22 51/24 52/6 55/14 55/15 55/17 55/25 56/1 56/9 57/22 59/11 59/13 59/15 59/16 60/17 61/16 62/11 67/2 67/3 67/4 69/21 69/23 70/21 74/18 74/20 74/20 75/12 75/23 76/2 76/5 76/9 76/12 77/14 77/16 77/17 78/19 80/3 80/9 80/11 80/23 82/2 82/4 82/15 83/14 83/15 85/16 85/16 86/5 86/9 86/25 87/7 87/18 88/5 88/21 88/25 89/1	day [11] 8/14 16/3 36/14 37/9 40/25 51/22 56/13 57/12 60/10 69/21 90/9 days [9] 10/5 24/22 37/9 41/8 44/13 52/15 63/18 71/2 71/16 DC [1] 72/21 deal [6] 3/22 73/1 78/2 78/3 78/6 87/15 dealing [3] 27/16 72/25 85/7 dealt [1] 42/5 decide [2] 10/10 84/10 decipher [1] 22/21 decision [3] 24/24 63/17 72/14 deem [1] 86/16 defend [1] 76/5 defendant [52] 1/8 1/19 2/4 4/22 10/1 10/14 10/24 11/6 11/10 11/11 15/5 16/9 17/6 17/11 18/12 19/7 19/7 19/23 20/1 20/3 20/6 22/23 23/25 24/3 24/4 27/3 28/18 29/23 31/9 34/18 34/19 35/7 37/22 39/25 48/8 50/24 52/4 74/8 79/5 79/12 79/21 79/24 80/14 80/21 81/2 81/6 83/4 83/7 83/10 83/10 83/16 85/17 defendant's [47] 2/8 7/17 8/21 17/8 17/25 18/7 18/18 19/12 19/13 24/18 26/10 30/4 34/11 34/17 35/1 35/5 35/7 45/12 45/19 48/20 51/22 56/15 56/17 56/19 58/1 59/19 59/19 60/24 61/23 62/25 63/4 63/19 66/13 66/15 66/20 67/19 67/24 68/5 71/15 73/11 74/4 75/2 75/5 81/15 83/4 84/4 89/18 defense [6] 18/18 52/10 63/15 66/16 68/2 69/11 deficient [1] 33/6 delivered [1] 69/17 delivery [1] 35/13 denial [8] 11/4 11/7 11/9 11/12 11/13 14/9 22/22 70/10 denials [1] 18/25 denied [30] 10/20 11/5 11/12 13/4 13/5 13/11 13/12 21/20 21/21 22/3 22/3 22/14 25/22 26/1 26/4 27/5 27/15 27/22 40/3 42/14 50/4 50/5 55/13 55/21 56/2 56/8 66/1 79/17 81/15 83/12 denies [2] 39/18 74/20 deny [16] 23/19 24/6 26/8 40/2 40/14 47/9 48/6 55/21 55/24 60/14 79/16 79/18 80/6 83/3 83/15 86/3 denying [3] 42/6 73/10
Clematis [1] 1/24 close [1] 50/7 code [3] 54/23 54/24 55/1 Coincidentally [1] 30/2 Collins [5] 50/17 51/2 51/16 53/22 59/3 Colon [36] 32/23 33/16 33/17 33/18 33/19 34/16 35/4 35/11 35/12 36/1 36/1 36/13 36/16 36/19 36/21 37/10 37/12 37/15 37/18 37/19 38/4 38/7 38/15 38/17 39/3 39/15 39/15 39/20 39/23 40/5 40/11 40/12 42/16 45/20 46/8 47/1 Colon's [5] 35/6 35/10 35/15 35/16 35/25 colorable [1] 46/18 come [24] 6/1 8/10 14/23 21/19 27/25 32/12 38/20 41/24 41/25 42/2 51/12 53/11 55/5 55/12 55/15 57/14 71/2 75/10 75/25 76/16 79/22 81/24 88/23 89/22 comes [1] 87/25 coming [5] 30/1 33/3 43/6 48/6 85/6 comment [3] 13/10 25/23 75/23 comments [1] 54/6 committed [6] 9/8 14/20 38/17 39/4 58/23 76/14 communicate [2] 77/13 88/21 communication [2] 50/14 73/8 company [1] 7/13 compel [11] 4/12 4/16 6/11 11/23 12/11 18/15 21/12 21/16 23/18 23/22 28/21 complain [1] 39/6 complaining [1] 29/23 complains [1] 37/4 complaint [1] 39/11 complete [5] 32/17 49/7 52/4 57/15 70/13 completely [3] 57/18 60/16 68/16 comply [3] 20/19 20/20 20/22 compromising [1] 4/6 computer [1] 57/13 concern [2] 86/8 86/9 concerned [1] 87/24 condition [1] 82/11 condominium [1] 82/13 conduct [1] 32/6 conducted [1] 67/9 conferring [2] 31/9 79/5 confessing [1] 15/8 confession [15] 9/7	confessions [1] 19/15 confine [2] 65/5 66/5 confirm [1] 63/17 confirmed [2] 49/21 55/20 confront [1] 75/25 confronted [1] 39/14 confusing [1] 29/21 confusion [1] 52/13 conjunction [1] 11/1 connection [1] 18/9 consider [2] 59/11 79/4 consideration [1] 83/11 considered [1] 83/1 contact [6] 53/13 77/20 78/17 87/1 88/18 88/23 contacted [1] 63/16 contain [1] 63/5 contained [11] 51/21 51/25 52/19 58/6 61/1 63/3 65/15 66/21 66/22 67/1 67/19 containing [1] 87/18 contains [1] 62/19 continuance [3] 83/23 84/6 85/9 continue [2] 84/4 84/9 control [1] 15/23 conversation [2] 20/25 64/22 copies [1] 30/7 Cops [1] 33/2 copy [22] 8/16 9/9 11/6 11/13 11/16 11/22 12/2 12/10 14/7 15/7 20/15 21/9 24/20 29/14 29/15 29/17 30/17 30/18 30/21 39/9 39/10 62/17 corner [2] 30/13 54/20 correct [15] 3/25 12/15 23/14 31/23 52/22 58/2 70/8 71/18 72/4 72/6 72/10 84/2 84/13 89/22 90/7 corridor [1] 8/4 corroborate [1] 86/21 corrupt [2] 6/23 28/5 corrupted [1] 28/8 cost [1] 88/20 counsel [10] 1/20 3/10 3/18 31/9 37/12 48/2 78/20 79/5 84/13 87/10 country [1] 32/22 County [5] 7/18 8/3 8/22 8/25 18/1 couple [5] 10/5 14/16 14/22 24/21 32/11 course [3] 62/16 69/14 69/18 court [119] 1/1 1/24 2/4 3/1 3/13 4/3 6/5 6/9 6/19 10/23 11/5 11/10 14/7 17/6 17/13 18/6 21/20 22/9 22/12	Courts [5] 2/8 31/25 32/1 32/2 83/3 courtesy [1] 89/4 courthouse [8] 7/18 8/6 8/11 8/12 8/21 8/25 18/1 37/16 courtroom [2] 5/3 16/11 Courts [1] 77/13 CR [4] 1/2 3/6 31/12 31/15 crazy [1] 57/15 criminal [5] 20/17 31/11 31/14 38/2 41/23 cross [15] 2/4 45/21 45/22 47/3 59/24 59/25 61/15 61/20 64/6 65/5 65/18 65/20 65/20 66/6 75/8 cross-examination [5] 2/4 64/6 65/5 65/18 66/6 cross-examine [10] 45/21 45/22 47/3 59/24 59/25 61/15 61/20 65/20 65/20 75/8 current [1] 71/1 currently [1] 25/25 customs [1] 56/22	
D	dad [7] 29/13 30/20 43/8 44/1 44/2 45/1 46/20 date [21] 49/11 49/25 49/25 50/19 51/2 51/10 57/18 59/6 60/18 66/19 70/11 71/1 71/13 71/16 71/22 71/24 75/24 77/15 77/16 77/17 84/14 dated [7] 13/25 49/14 52/23 53/10 58/1 72/4 90/9 dates [1] 30/1		

D	11/16 13/22 18/25 19/1 26/19 26/21 31/13 39/8 51/1 51/3 51/15 51/25 52/5 52/23 56/22 56/23 56/24 56/24 56/25 58/5 61/4 63/5 63/9 63/14 67/24 69/10 89/13 documentation [3] 27/22 62/20 76/12 documented [1] 78/19 documents [36] 18/19 19/21 21/14 21/15 21/15 24/5 25/5 25/9 27/9 27/10 33/24 35/21 37/18 37/23 37/25 38/4 38/7 38/8 38/9 49/6 51/21 52/17 53/18 57/2 58/12 58/25 59/23 63/21 65/10 65/12 66/1 66/3 66/7 71/10 75/6 75/9 doing [3] 22/16 88/2 88/3 door [4] 32/15 32/17 32/18 36/1 draft [57] 11/6 22/22 23/8 33/10 50/23 51/3 51/10 51/16 51/19 51/20 52/6 52/19 53/7 53/22 53/24 54/1 54/12 55/2 55/7 55/17 55/19 56/24 57/8 57/10 57/16 57/17 57/21 57/24 57/25 57/25 59/5 59/12 60/12 60/19 60/20 60/25 63/15 66/11 66/12 66/14 66/18 66/24 66/25 67/1 67/7 67/8 67/13 67/14 68/11 68/12 68/16 69/2 69/11 69/24 70/1 70/6 70/25 drafted [2] 61/17 66/15 drafting [1] 57/21 driver [1] 44/9 drop [1] 8/11 dropping [1] 35/13 drugs [1] 33/2 Duarte [13] 15/4 16/8 17/5 19/5 19/10 19/18 19/21 19/22 19/24 19/25 20/12 20/15 24/1 due [1] 88/4 duties [1] 35/9 duty [1] 41/25	employed [1] 62/5 employee [2] 7/12 44/6 empty [1] 70/13 encounter [3] 36/6 36/9 36/20 engaged [1] 74/8 English [4] 25/15 25/17 25/18 25/19 enter [3] 36/5 39/24 79/16 entered [3] 27/13 42/6 64/24 entire [1] 66/5 entirety [1] 69/12 entitled [5] 26/24 75/11 80/9 80/10 90/8 entry [42] 3/24 4/23 5/6 11/9 11/14 11/16 11/22 12/13 12/24 13/17 14/8 16/18 18/16 18/17 23/14 23/15 23/17 24/7 24/17 25/1 25/3 26/9 26/15 26/21 26/22 29/2 36/15 48/11 48/13 51/1 75/18 80/15 81/4 81/6 81/7 81/12 81/18 83/17 84/3 89/5 89/10 89/13 ESQ [1] 1/20 establish [3] 58/23 58/24 79/4 establishing [1] 47/10 evening [1] 35/25 events [1] 50/12 everybody [1] 3/2 evidence [40] 5/22 6/13 6/15 6/17 6/18 7/7 7/24 9/16 17/18 17/20 17/21 20/18 20/23 23/23 23/24 28/7 28/10 32/2 35/17 40/4 42/15 43/21 45/25 46/4 48/7 56/19 58/9 58/12 58/18 59/21 59/21 75/9 75/12 75/13 79/14 79/22 86/12 86/20 87/25 88/24 evidentiary [17] 6/2 20/8 40/8 40/19 42/18 42/19 46/25 47/1 47/18 47/19 79/3 79/25 80/1 80/8 80/9 80/10 80/12 ex [6] 3/24 4/4 76/3 78/4 80/13 89/18 ex parte [1] 89/18 ex-INS [1] 76/3 exactly [4] 30/2 65/13 75/14 79/2 examination [9] 2/4 2/4 62/3 64/6 65/5 65/6 65/18 66/6 66/6 examine [10] 45/21 45/22 47/3 59/24 59/25 61/15 61/20 65/20 65/20 75/8 example [2] 35/24 87/19 exceedingly [1] 17/4 exception [1] 5/13 exculpatory [1] 37/23 excuse [1] 89/16 excused [1] 73/25	exhibit [47] 2/8 2/8 30/9 31/25 32/1 32/2 56/15 56/17 56/19 58/1 59/19 59/20 60/24 61/14 62/9 62/9 62/12 62/13 62/25 63/2 63/4 63/8 63/9 63/15 63/19 63/20 65/13 65/14 65/14 65/16 66/13 66/15 66/16 66/20 67/18 67/19 67/24 68/2 68/5 68/20 68/21 69/11 71/7 71/15 72/25 74/4 74/5 Exhibit 2 [3] 65/14 68/2 74/5 exhibits [7] 2/7 49/17 64/17 65/7 73/1 74/1 87/20 exist [4] 21/15 58/14 59/3 60/21 existence [1] 37/23 expect [1] 87/16 expected [1] 36/23 expedition [1] 34/21 expert [1] 27/24 explain [6] 4/3 5/23 19/7 25/15 32/6 55/3 explained [1] 65/14 Export [1] 7/13 Export/Import [1] 7/13 extent [2] 21/11 37/24
E	e-mail [1] 69/3 early [1] 84/18 east [2] 1/17 30/12 edited [1] 6/24 educate [1] 42/9 effect [2] 37/12 46/7 effects [1] 55/17 Eileen [1] 67/11 either [8] 22/14 34/4 38/4 39/24 53/17 64/17 72/8 87/12 electronically [2] 87/11 87/12 elicit [1] 43/22 eliminated [1] 76/5	fabricate [1] 59/7 fabricated [19] 56/22 57/2 58/11 58/25 59/21 59/23 62/9 62/10 65/11 65/25 66/3 66/8 71/6 74/5 75/6 75/9 76/1 87/21 87/21 fabricating [2] 53/17 77/6 fabrication [2] 13/21 74/9 face [4] 32/13 32/19 36/3 56/3 facility [1] 36/15 fact [14] 7/11 9/6 24/17 27/12 39/9 50/10 50/11 50/14 52/9 60/7 72/13 78/22 78/23 78/24 factors [1] 83/9 facts [3] 38/16 40/6 41/15 fair [2] 82/9 82/10 fake [2] 12/20 50/18 false [9] 27/8 59/11 65/12 74/18 86/17 87/3 87/20 88/6 88/6 falsified [3] 28/1 60/16 60/22 falsify [1] 56/6 familiar [1] 68/14 family [19] 7/4 9/5 14/21 32/11 33/7 33/11 33/19 33/20 34/5 42/20 43/5 43/6 45/6 45/6 47/12 74/19 77/21 82/7 82/12 family's [2] 33/12	

F	finish [3] 22/6 75/4 78/5	give [13] 4/19 9/11 10/10 24/9 30/18 50/11 50/11 50/19 56/1 56/11 57/18 60/11 80/10	72/19 74/5 74/8 75/5 80/3 81/17 82/23 82/25 85/18 85/23 89/17
family's... [1] 33/13	finishes [1] 54/9	given [2] 9/12 78/20	government threatening [1] 34/25
far [11] 18/23 20/2 23/17 32/19 41/1 43/18 57/3 61/2 79/18 82/16 88/13	fired [1] 78/21	giving [3] 30/11 47/8 66/2	government's [26] 10/17 11/23 12/10 17/7 18/17 19/9 21/10 21/22 23/19 24/18 26/11 28/19 28/23 29/1 29/10 32/5 34/13 40/1 42/11 43/19 45/12 45/17 48/4 48/12 74/13 84/22
father [1] 29/6	first [23] 3/22 6/12 12/9 31/10 32/10 40/24 48/24 49/3 49/24 51/14 51/20 52/16 52/18 53/21 56/24 57/25 62/14 63/1 63/9 63/11 66/11 76/13 78/3	go [47] 3/3 3/7 3/21 4/15 6/12 9/1 12/6 12/9 13/22 14/5 16/24 22/4 26/9 28/5 28/15 28/17 28/23 30/25 32/14 32/20 33/14 40/16 43/24 44/4 44/18 44/21 45/6 45/7 47/11 47/24 54/10 56/1 56/4 59/2 59/13 60/1 64/5 64/19 65/18 80/13 83/15 87/4 87/11 87/11 87/13 89/17 89/17	grant [2] 48/17 82/15
father-in-law [1] 29/6	fish [1] 45/2	goes [5] 22/24 50/13 50/14 52/7 87/9	granting [1] 81/17
fault [1] 78/25	fish [1] 45/2	going [92] 5/25 6/1 6/8 9/2 9/23 14/3 14/11 16/20 21/6 21/18 22/4 23/19 24/6 24/6 26/8 27/24 28/20 28/23 30/3 31/24 32/4 32/18 32/20 32/23 33/14 39/24 40/2 40/14 40/14 40/15 42/13 43/7 44/21 46/22 47/9 47/17 48/5 51/10 51/11 54/5 55/11 56/2 56/4 56/14 56/16 57/17 59/5 59/6 59/8 59/13 59/14 60/13 60/14 60/23 61/7 61/12 61/13 64/20 65/19 70/25 73/10 74/4 75/24 76/8 78/2 78/3 78/6 78/7 78/25 79/6 79/8 79/11 79/16 80/6 82/9 83/3 83/15 83/18 85/10 86/3 86/19 86/25 87/4 87/6 88/7 88/8 88/15 88/22 89/6 89/7 89/16 89/17	great [1] 45/5
Fax [1] 69/2	fishing [6] 33/11 34/1 34/7 34/21 44/24 44/25	good [8] 3/2 3/9 3/12 3/14 3/15 3/17 3/19 89/25	green [1] 10/25
FBI [6] 7/5 43/9 59/25 69/13 74/7 85/18	fishy [1] 25/14	goofy [1] 82/5	grounds [2] 49/7 84/8
FCRR [2] 1/23 90/11	fit [1] 86/16	gotta [1] 76/7	guarantees [1] 83/10
FDC [9] 8/10 38/19 41/1 47/24 47/25 49/21 80/19 88/13 89/7	five [4] 15/3 16/24 19/5 19/18	gotten [1] 75/16	guess [6] 21/4 22/4 22/11 41/6 55/16 73/2
fear [1] 32/24	flat [2] 44/25 45/19	government [82] 1/16 4/13 6/17 6/20 7/25 8/23 11/10 12/1 12/17 12/19 13/3 13/23 14/25 15/15 15/16 15/25 16/7 16/10 16/13 16/21 17/12 18/2 19/14 19/20 19/24 20/1 20/14 21/13 21/16 23/22 23/23 24/1 24/5 25/7 26/13 27/6 27/11 27/17 27/17 28/4 28/25 29/4 31/4 31/16 32/7 32/8 34/6 34/8 34/14 34/25 38/3 38/6 38/17 39/14 39/17 45/14 46/10 46/15 47/2 50/20 51/1 51/22 52/8 52/24 53/15 53/16 54/3 56/23 57/1 63/24 65/12	guns [4] 32/12 32/19 36/4 36/25
featured [1] 73/17	flight [1] 81/3	guy [4] 67/3 69/17 69/21 69/25	H
February [1] 90/9	FLORIDA [8] 1/1 1/8 1/18 1/21 1/25 39/11 50/15 55/9		H-A-M-A-D-E [1] 72/12
federal [9] 14/21 20/17 38/2 51/9 57/16 60/19 62/6 62/16 90/6	followed [1] 45/8		half [1] 80/23
fees [1] 77/22	following [2] 45/6 63/13		Hamade [1] 72/12
female [1] 67/11	force [1] 14/23		hand [14] 29/13 29/24 30/3 30/5 30/13 30/24 31/2 49/1 49/4 60/17 62/10 69/24 89/7 89/8
Field [1] 62/7	foregoing [1] 90/6		handcuffs [2] 12/6 14/5
file [61] 7/8 7/10 7/11 8/1 18/8 18/24 22/24 25/1 28/16 28/21 40/17 41/14 42/16 47/22 49/1 50/9 51/22 51/24 51/25 52/4 52/7 52/20 52/25 53/1 53/7 55/4 55/8 56/25 57/9 58/6 61/1 62/17 62/18 62/19 62/25 63/5 63/7 65/15 66/16 66/21 66/22 66/23 67/1 67/1 67/3 67/4 67/19 69/12 69/17 69/18 69/22 70/4 70/8 71/7 74/19 76/6 79/24 80/7 80/16 84/7 86/14	forged [1] 49/19		handed [6] 4/23 9/10 9/14 49/10 49/13 49/25
filed [18] 3/24 4/13 6/10 11/1 11/10 17/1 25/3 39/2 39/19 39/20 47/14 75/3 75/22 80/24 81/19 84/1 84/7 87/8	form [2] 35/1 40/5		handing [1] 89/10
files [24] 4/12 4/17 6/11 7/17 8/4 8/5 8/10 8/12 8/21 8/24 9/13 9/18 9/19 14/6 14/15 17/25 18/4 21/12 21/15 23/18 28/12 28/13 28/22 47/25	formal [4] 11/4 11/4 11/9 23/12		handle [2] 84/5 84/11
filing [4] 12/14 12/17 18/15 24/19	Fort [2] 1/18 1/21		handled [1] 83/24
filings [4] 17/3 17/15 25/9 25/10	forth [2] 23/5 35/3		handwriting [1] 63/6
final [2] 52/15 57/25	forward [1] 48/7		happen [1] 9/24
finally [1] 15/3	found [4] 37/10 48/12 81/12 81/18		happened [1] 41/19
find [7] 21/6 26/19 57/8 57/11 57/14 88/21 88/23	foundation [2] 47/10 48/5		happening [1] 85/21
finding [5] 25/8 27/6 48/3 74/4 81/1	four [3] 9/16 14/13 19/4		happy [2] 29/18 79/25
findings [2] 27/13 27/14	fraud [4] 9/8 14/20 58/23 76/18		hard [1] 25/12
finds [3] 40/17 42/17 46/24	Fred [14] 64/9 64/23 64/23 66/13 66/14 66/16 66/18 66/24 67/4 68/5 68/10 68/14 69/2 70/9		hear [2] 64/15 81/20
fine [4] 4/21 25/17 25/18 30/10	free [3] 79/21 79/24 86/14		heard [2] 74/3 79/14
	Friday [1] 41/1		hearing [83] 1/12 6/2 6/21 11/4 11/20 12/20 13/9 15/11 15/12 20/8 20/8 23/8 30/9 31/2 31/11 31/14 37/11 40/8 40/8 40/20 42/18 42/19 46/25 47/1 47/12 47/15 47/18 47/19 50/23 51/4 51/23 52/9 52/11 52/20 53/3 53/6 55/18 56/15 56/18 61/1 63/13 63/21 65/16 67/9 67/10 67/12 70/2 71/2 71/16 71/17 71/19 72/10 73/7 73/14 73/17 73/18 73/20 74/23 75/24 76/3 78/8 79/3 79/7 79/25 80/1 80/9 80/10 80/12 81/4 81/4 81/13 84/19 87/1 87/6 87/7 87/8 87/9 87/13 87/17 88/22 89/6 89/13 89/18
	Friedman [2] 52/11 60/17		hearings [7] 4/5 4/10
	frivolous [1] 86/10		
	front [14] 6/21 7/21 11/17 37/7 41/24 41/25 42/2 63/13 63/21 83/7 83/8 84/16 84/20 85/7		
	full [1] 61/24		
	fully [1] 81/21		
	fund [1] 3/23		
	further [3] 68/8 70/18 79/22		
	future [1] 80/7		
	G		
	gearing [1] 36/12		
	generally [2] 34/11 36/23		
	germane [1] 35/22		
	getting [4] 25/16 32/11 77/25 79/9		

H	25/21 25/24 25/25 26/8 26/20 26/21 27/16 27/21 27/24 28/19 30/3 30/11 30/18 31/24 33/9 34/15 38/13 38/20 39/24 40/14 40/14 40/15 44/8 44/14 44/19 44/20 44/20 44/23 46/4 47/2 47/8 48/3 48/5 51/7 54/5 56/7 56/14 56/15 58/16 59/13 59/14 60/13 60/14 60/23 61/7 61/12 61/13 62/6 65/19 66/2 70/20 70/22 70/22 71/23 72/1 72/20 74/4 75/24 76/6 76/8 76/10 76/23 77/8 77/10 78/25 79/6 79/7 79/11 79/16 80/6 82/8 82/9 82/15 84/13 86/25 87/4 87/5 87/5 87/14 88/7 88/8 88/19 88/22 89/16 89/17	included [2] 69/12 72/13 including [2] 6/13 17/18 incomplete [1] 49/6 incriminate [2] 16/3 56/6 incriminating [1] 34/7 incumbent [1] 35/18 independent [2] 52/17 52/17 indicate [2] 35/17 61/3 indicated [15] 12/2 23/7 27/7 27/11 37/19 37/22 38/8 42/13 42/14 45/10 46/16 56/23 67/18 78/4 85/8 indicates [2] 31/4 31/16 indictment [21] 26/11 26/14 28/19 28/24 29/2 32/5 35/14 40/1 42/12 43/20 48/9 48/15 48/21 69/20 69/23 70/1 70/4 74/10 75/19 79/12 79/18 indigent [5] 76/10 80/15 80/21 83/5 83/16 individual [1] 35/12 individuals [2] 5/18 88/11 information [16] 18/3 23/1 27/19 33/6 33/12 34/1 34/7 34/21 35/22 36/12 44/25 45/1 55/7 57/24 58/3 88/13 informed [1] 87/5 informing [1] 86/25 ink [2] 30/13 63/2 inmates [3] 8/2 9/1 9/3 innuendo [1] 86/13 inquiry [4] 64/17 65/18 70/18 72/17 INS [2] 55/11 76/3 inside [3] 8/3 8/5 9/1 insufficient [1] 47/17 insurance [2] 44/3 44/4 intend [2] 20/18 87/4 intention [2] 55/13 55/24 interest [1] 16/12 interpret [1] 34/21 interrupt [1] 61/11 interview [3] 6/7 36/18 68/15 intimidate [2] 56/6 74/19 intimidated [8] 7/5 34/16 34/16 46/9 77/23 79/10 88/6 88/7 intimidating [1] 32/15 intimidation [7] 32/11 37/1 37/2 43/5 43/17 46/16 77/19 introduce [2] 20/24 29/17 introduced [4] 65/7 65/10 82/2 87/20 introducing [1] 20/23	investigate [2] 35/19 79/21 investigation [6] 35/4 62/7 62/16 62/17 69/14 69/19 investigative [1] 37/2 investigator [6] 3/23 4/3 77/24 78/3 83/19 89/19 invoke [2] 5/2 5/9 involved [2] 33/1 76/22 involvement [4] 35/4 35/6 35/18 45/1 irrelevant [1] 34/22 issue [8] 12/9 16/5 33/24 37/5 43/19 44/16 64/25 83/2 issued [7] 23/13 27/2 31/4 32/7 35/20 35/23 81/5 issues [6] 16/6 34/23 70/19 73/19 75/17 75/18 it's [45] 6/24 7/8 11/3 12/6 13/18 13/20 16/20 17/12 20/9 25/12 26/13 26/20 26/21 29/20 31/8 34/7 34/22 36/14 38/18 40/15 41/17 41/17 41/18 43/16 46/22 49/12 50/16 54/1 54/23 55/4 62/19 64/12 72/3 76/20 76/21 77/2 80/19 80/20 82/5 84/3 84/22 84/25 84/25 85/1 85/21 items [2] 23/20 23/22
H	hearings... [5] 25/18 41/25 77/12 87/10 89/1 help [5] 41/15 45/3 77/22 77/25 82/17 helped [2] 33/9 35/7 hiding [1] 22/14 history [2] 23/6 83/6 hit [1] 4/22 home [5] 7/17 8/21 17/25 43/9 44/6 Homeland [1] 57/17 homework [1] 76/13 Honor [134] 3/9 3/17 4/20 5/1 5/12 5/17 5/25 7/3 7/20 8/15 9/8 9/17 10/19 11/18 12/5 12/15 12/19 13/1 13/15 13/19 14/7 14/19 15/21 16/2 16/3 16/11 16/16 16/19 17/2 17/4 17/10 17/23 18/23 20/13 21/1 21/18 21/24 22/21 23/5 24/8 26/16 27/8 27/20 28/12 28/16 29/19 30/3 30/10 30/11 30/21 31/20 32/10 33/5 34/2 34/24 35/15 36/3 36/11 37/14 38/12 38/24 39/5 40/23 43/14 43/24 44/12 44/19 45/9 46/11 46/19 48/18 48/24 49/4 50/7 50/22 51/5 51/9 51/13 52/22 53/19 54/5 54/6 54/17 55/9 56/1 56/4 57/4 57/19 58/17 58/20 59/1 59/9 59/24 60/2 60/4 60/14 60/22 61/10 61/16 61/22 62/13 62/23 63/4 64/1 64/14 65/2 65/3 67/15 67/20 68/24 69/4 70/20 72/20 73/2 73/24 74/16 75/3 75/14 75/22 77/8 77/17 78/16 79/7 80/18 80/22 82/21 82/24 85/15 85/22 86/24 87/23 88/4 89/11 89/20	I've [12] 19/7 21/10 25/17 27/1 29/3 30/12 37/21 41/8 74/3 79/14 80/16 84/6 I-291 [1] 54/22 I-485 [5] 10/2 10/14 11/1 11/9 73/11 I29 [1] 54/23 I29I [1] 54/21 ICE [12] 10/1 10/13 13/10 13/10 18/14 22/1 22/8 22/11 25/24 25/24 26/19 66/11 idea [10] 10/22 17/8 40/25 41/1 41/4 53/20 76/8 77/16 88/12 88/16 identified [9] 23/10 36/16 63/7 63/14 63/19 66/12 67/24 69/10 71/15 identify [2] 22/23 35/12 immigration [69] 10/2 10/8 10/14 12/14 12/17 12/21 13/24 13/24 18/9 18/10 18/15 18/19 18/21 19/3 21/20 23/2 23/6 23/9 24/5 24/13 24/25 25/5 25/5 27/24 27/24 48/25 49/12 49/15 49/21 50/4 50/9 50/9 50/14 50/16 51/9 51/17 52/11 53/13 53/21 54/24 55/3 55/6 55/11 55/19 56/23 57/13 57/17 58/13 59/2 60/9 60/11 60/12 60/25 62/19 63/10 63/11 63/16 64/9 65/17 67/10 69/13 71/17 72/11 72/13 72/21 76/2 76/4 78/12 78/13 Import [1] 7/13 impossible [4] 12/7 55/6 60/12 60/13 improper [3] 45/23 60/9 70/16 improperly [1] 29/5 incarcerated [1] 78/23	investigation [6] 35/4 62/7 62/16 62/17 69/14 69/19 investigative [1] 37/2 investigator [6] 3/23 4/3 77/24 78/3 83/19 89/19 invoke [2] 5/2 5/9 involved [2] 33/1 76/22 involvement [4] 35/4 35/6 35/18 45/1 irrelevant [1] 34/22 issue [8] 12/9 16/5 33/24 37/5 43/19 44/16 64/25 83/2 issued [7] 23/13 27/2 31/4 32/7 35/20 35/23 81/5 issues [6] 16/6 34/23 70/19 73/19 75/17 75/18 it's [45] 6/24 7/8 11/3 12/6 13/18 13/20 16/20 17/12 20/9 25/12 26/13 26/20 26/21 29/20 31/8 34/7 34/22 36/14 38/18 40/15 41/17 41/17 41/18 43/16 46/22 49/12 50/16 54/1 54/23 55/4 62/19 64/12 72/3 76/20 76/21 77/2 80/19 80/20 82/5 84/3 84/22 84/25 84/25 85/1 85/21 items [2] 23/20 23/22
H	HONORABLE [1] 1/13 hopefully [1] 31/1 hour [1] 81/5 house [14] 16/4 32/12 32/17 33/12 33/13 35/25 36/5 43/6 43/8 43/10 43/25 45/16 46/9 82/11 huge [1] 44/7 hundreds [2] 35/16 38/1 Hunt [5] 41/5 41/5 41/21 41/21 88/14		
I	I'll [10] 22/23 30/8 31/25 49/4 69/8 74/22 79/4 79/25 81/1 89/16 I'm [103] 3/18 5/25 8/22 10/12 11/15 12/22 13/11 16/11 22/2 22/12 22/13 22/21 24/6 24/6 24/9 24/17 25/14 25/20		
I			
J			jail [4] 8/3 56/10 76/6 88/20 JASON [2] 1/20 3/17 job [2] 32/25 32/25 Jonathan [2] 52/10 60/16 judge [50] 1/14 6/22 8/7 8/13 9/9 10/10 13/10 15/7 15/12 20/25 25/23 27/2 27/6 27/13 27/21 37/6 37/7 37/8 37/11 39/10 39/11 41/10 41/20 41/22 42/1 42/1 42/5 45/18 52/13 52/21 55/24 63/22 72/8 81/2 81/8 81/9 81/13 81/14 81/23 83/7 83/8 83/12 83/12 83/24 84/5 84/17 84/20 85/7 85/10 89/14 judge's [1] 81/16 judges [4] 41/24 42/2 42/8 81/21 juncture [1] 45/24
K			keep [7] 33/18 44/10 44/15 44/21 45/5 45/6 77/20 keeping [3] 33/3 33/3 79/9 keeps [1] 22/25

K	lengthy [1] 26/12 letter [146] 9/7 9/8 9/9 9/10 9/11 9/12 12/20 12/25 13/1 13/2 13/14 14/20 14/22 15/4 15/6 15/7 15/11 15/12 15/14 15/17 15/25 16/8 16/12 16/14 16/15 16/19 17/5 19/6 19/10 19/22 19/25 20/15 21/4 21/7 21/9 23/9 23/13 24/1 27/25 28/1 49/11 49/13 49/18 49/19 49/19 49/20 49/20 49/23 49/24 49/25 50/3 50/4 50/6 50/7 50/8 50/17 50/18 50/18 50/23 51/11 51/15 51/16 51/20 52/15 52/19 53/7 53/10 54/12 54/13 54/19 55/2 55/5 55/9 55/9 55/12 55/12 55/15 55/22 56/14 56/16 56/17 57/6 57/9 57/10 57/21 57/21 57/23 57/24 57/25 57/25 58/1 58/7 58/19 59/6 59/8 59/11 59/15 59/16 60/3 60/8 60/9 60/13 60/16 60/17 60/18 60/20 60/21 60/25 61/2 62/12 62/25 63/6 64/20 66/11 66/11 66/11 66/14 66/23 67/6 67/6 67/22 69/25 70/1 70/6 70/6 70/10 70/10 70/13 70/14 70/23 70/24 70/25 71/2 71/3 71/3 71/13 71/14 71/21 71/21 71/24 72/3 72/4 72/8 72/21 73/16 76/1	60/3 60/6	89/2	
kind [9] 33/1 33/7 33/10 35/18 55/16 64/22 81/24 81/25 82/5 KMW [1] 31/12 knock [2] 32/17 32/18 knocked [1] 36/1 know [73] 5/2 7/4 7/9 7/14 9/23 12/23 15/20 16/1 16/25 17/4 18/6 18/14 18/17 21/8 21/9 22/4 22/8 22/25 23/4 23/4 23/7 24/16 28/17 30/3 33/2 33/8 36/13 43/4 45/4 45/19 45/20 49/5 52/15 54/2 54/7 57/4 59/3 60/5 61/16 67/14 67/21 70/21 70/22 71/25 72/3 72/5 74/17 74/25 76/2 76/7 76/13 76/15 77/1 77/12 77/14 77/17 78/18 78/20 80/16 82/4 82/7 83/25 84/9 84/21 85/15 85/18 85/20 85/20 87/9 87/17 88/19 88/22 89/6 knowing [2] 43/8 60/10 knowledge [6] 5/19 18/3 18/5 54/1 54/1 67/22 knows [3] 36/1 52/6 61/17 KREISS [7] 1/20 3/17 3/19 20/20 31/2 31/3 89/7 Kyles [11] 4/12 4/16 6/11 11/23 12/11 18/16 21/12 23/18 26/8 27/16 28/22 Kyles/Brady [2] 26/8 27/16	letter [146] 9/7 9/8 9/9 9/10 9/11 9/12 12/20 12/25 13/1 13/2 13/14 14/20 14/22 15/4 15/6 15/7 15/11 15/12 15/14 15/17 15/25 16/8 16/12 16/14 16/15 16/19 17/5 19/6 19/10 19/22 19/25 20/15 21/4 21/7 21/9 23/9 23/13 24/1 27/25 28/1 49/11 49/13 49/18 49/19 49/19 49/20 49/20 49/23 49/24 49/25 50/3 50/4 50/6 50/7 50/8 50/17 50/18 50/18 50/23 51/11 51/15 51/16 51/20 52/15 52/19 53/7 53/10 54/12 54/13 54/19 55/2 55/5 55/9 55/9 55/12 55/12 55/15 55/22 56/14 56/16 56/17 57/6 57/9 57/10 57/21 57/21 57/23 57/24 57/25 57/25 58/1 58/7 58/19 59/6 59/8 59/11 59/15 59/16 60/3 60/8 60/9 60/13 60/16 60/17 60/18 60/20 60/21 60/25 61/2 62/12 62/25 63/6 64/20 66/11 66/11 66/11 66/14 66/23 67/6 67/6 67/22 69/25 70/1 70/6 70/6 70/10 70/10 70/13 70/14 70/23 70/24 70/25 71/2 71/3 71/3 71/13 71/14 71/21 71/21 71/24 72/3 72/4 72/8 72/21 73/16 76/1	M machine [1] 55/17 magic [1] 55/16 magistrate [18] 1/14 7/22 41/3 41/20 41/22 41/24 42/1 42/2 42/8 50/18 63/13 71/16 71/19 72/1 81/2 81/16 88/14 88/14 magistrates [1] 41/16 mail [3] 69/3 87/12 89/6 Mailed [1] 69/6 mails [1] 47/25 making [8] 5/24 6/16 31/18 39/13 41/14 60/6 84/8 86/9 man [2] 15/8 16/21 managed [1] 26/18 March [37] 11/8 11/8 13/4 13/5 13/6 13/9 13/12 14/8 22/1 22/4 22/16 26/1 26/2 49/14 49/20 50/1 50/5 50/6 50/24 52/16 52/24 53/4 53/7 53/10 54/19 55/21 55/21 55/22 56/17 58/2 58/7 61/2 62/12 69/17 70/10 71/13 81/2 March 27 [2] 22/16 26/1 March 29 [13] 11/8 13/4 13/6 13/9 22/1 50/5 50/24 53/4 53/7 55/21 62/12 69/17 81/2 March 29th [1] 49/20 March 31 [21] 11/8 13/5 13/12 14/8 22/4 26/2 49/14 50/1 50/6 52/16 52/24 53/10 54/19 55/21 55/22 56/17 58/2 58/7 61/2 70/10 71/13 Margate [5] 33/17 50/15 53/23 55/8 58/2 marital [1] 64/12 marked [4] 30/4 30/12 49/6 49/11 markings [1] 63/3 marriage [2] 64/24 64/24 married [1] 33/22 marshals [3] 12/8 14/3 14/4 material [18] 4/12 4/16 6/11 11/24 12/11 14/13 14/17 18/16 18/21 19/5 19/9 19/11 19/17 20/13 21/12 23/18 23/25 28/21 materials [1] 20/1 matter [24] 4/11 7/11 9/6 21/1 23/6 27/15 35/23 39/9 40/20 41/19 41/21 50/10 50/13 72/18 74/24 77/19 79/21 80/14 81/8 81/20 82/24 84/21 88/15 90/8 matters [7] 3/20 5/22 41/24 41/25 42/2 54/11	MATTHEWMAN [2] 1/13 3/6 May 10 [1] 81/13 me.now [1] 4/7 mean [7] 14/17 19/12 34/22 45/4 71/25 71/25 72/2 meeting [6] 15/4 16/8 19/6 19/22 20/3 24/3 meetings [1] 32/14 member [1] 33/19 members [1] 33/19 mentioned [4] 14/16 73/18 81/24 85/22 mentions [1] 85/19 mere [1] 79/23 messing [1] 8/4 met [3] 36/2 36/15 37/15 Miami [7] 41/3 50/17 55/5 55/7 59/2 62/7 63/22 Michael [2] 76/25 77/3 microphone [1] 6/9 middle [1] 36/13 Mike [1] 76/21 mind [1] 54/2 mine [1] 60/21 ministerial [1] 35/9 minute [3] 45/10 48/18 54/8 minutes [5] 4/24 12/3 14/16 36/7 36/21 misconduct [13] 26/12 28/25 40/2 42/13 43/21 44/24 59/15 74/9 76/14 77/6 77/19 86/5 86/6 missing [16] 5/22 6/5 6/13 6/24 7/9 7/10 7/16 8/20 9/5 15/6 15/9 17/18 17/21 17/25 28/13 28/14 misspelled [1] 57/18 mistake [1] 55/6 MITRANI [30] 1/16 3/10 10/22 16/24 22/19 48/10 48/15 48/21 49/3 50/4 51/14 58/11 58/24 59/22 61/3 63/20 63/24 73/4 74/6 74/11 75/19 79/13 79/19 84/21 85/8 85/13 89/3 89/9 89/12 89/15 Mitrani's [1] 60/23 Molanato [1] 67/11 mom [1] 46/19 moment [2] 4/19 5/1 Monday [4] 84/20 85/4 85/6 89/14 Monday's [1] 89/5 money [6] 76/10 77/22 82/6 82/17 88/19 88/20 month [1] 80/23 months [1] 70/12 Moreno [1] 39/10 morning [3] 50/5 85/1 85/1 mortgage [1] 44/3 mother [16] 33/22 34/16 34/17 35/2 38/25 39/16 39/20 39/23 40/6	
L	life [4] 15/23 17/5 32/24 45/8 light [1] 23/19 limited [3] 70/19 71/8 77/10 lines [1] 35/20 listen [5] 46/12 59/18 79/1 80/1 80/2 listening [1] 65/8 litigated [1] 82/25 little [4] 19/7 29/21 63/2 82/12 live [3] 56/4 59/7 60/10 location [1] 55/4 long [4] 11/3 33/13 78/14 83/6 longer [1] 37/17 look [9] 12/3 29/18 34/6 49/2 49/9 50/7 54/19 74/17 77/9 looking [4] 11/15 24/17 25/8 26/19 lost [3] 32/25 76/19 77/6 lot [7] 7/20 7/22 9/13 12/23 63/2 76/18 77/10 lying [4] 22/15 60/2	letters [9] 27/23 48/25 50/1 58/14 58/21 58/22 59/20 74/9 88/5 life [4] 15/23 17/5 32/24 45/8 light [1] 23/19 limited [3] 70/19 71/8 77/10 lines [1] 35/20 listen [5] 46/12 59/18 79/1 80/1 80/2 listening [1] 65/8 litigated [1] 82/25 little [4] 19/7 29/21 63/2 82/12 live [3] 56/4 59/7 60/10 location [1] 55/4 long [4] 11/3 33/13 78/14 83/6 longer [1] 37/17 look [9] 12/3 29/18 34/6 49/2 49/9 50/7 54/19 74/17 77/9 looking [4] 11/15 24/17 25/8 26/19 lost [3] 32/25 76/19 77/6 lot [7] 7/20 7/22 9/13 12/23 63/2 76/18 77/10 lying [4] 22/15 60/2		
L-E [1] 77/2 labeling [1] 49/7 lady [1] 32/19 laid [1] 83/9 lasted [5] 36/7 36/9 36/20 81/4 81/4 late [1] 37/7 Lauderdale [2] 1/18 1/21 Lauer [2] 76/25 77/3 law [1] 29/6 Lawful [1] 10/25 lawfully [1] 35/23 lawyer [19] 9/11 9/14 11/6 12/7 26/18 33/9 33/9 52/11 55/11 55/20 70/22 71/18 72/7 76/16 77/11 78/24 78/25 82/2 82/17 lawyers [9] 9/6 21/5 21/5 28/12 28/14 76/2 78/12 78/21 78/22 leave [3] 48/1 74/22 83/18 left [6] 8/5 8/13 27/9 36/5 36/24 54/20 legal [1] 77/22 legally [1] 32/19	life [4] 15/23 17/5 32/24 45/8 light [1] 23/19 limited [3] 70/19 71/8 77/10 lines [1] 35/20 listen [5] 46/12 59/18 79/1 80/1 80/2 listening [1] 65/8 litigated [1] 82/25 little [4] 19/7 29/21 63/2 82/12 live [3] 56/4 59/7 60/10 location [1] 55/4 long [4] 11/3 33/13 78/14 83/6 longer [1] 37/17 look [9] 12/3 29/18 34/6 49/2 49/9 50/7 54/19 74/17 77/9 looking [4] 11/15 24/17 25/8 26/19 lost [3] 32/25 76/19 77/6 lot [7] 7/20 7/22 9/13 12/23 63/2 76/18 77/10 lying [4] 22/15 60/2			

M	61/15 61/20 62/8 62/17 63/13 63/25 64/2 64/8 64/16 65/22 66/20 66/24 66/25 67/10 67/11 67/22 68/4 68/17 68/18 68/19 68/20 68/21 69/15 70/17 71/5 72/11 72/13 72/17 74/10 80/2 80/16 81/10 81/20 83/20 85/3 85/6 86/4 86/23 89/5 89/7 89/9	60/23	notice [4] 72/14 87/8 87/9 87/13 notices [3] 87/10 87/11 87/12 notify [1] 89/1 November [2] 84/16 84/18 November 4 [1] 84/16 November 4th [1] 84/18 number [21] 3/5 6/12 7/7 7/16 10/6 10/21 14/13 15/3 17/17 18/13 19/4 19/5 19/18 21/19 31/12 31/14 54/20 55/5 55/5 59/2 63/7 number three [1] 10/21 numbers [1] 14/12 numerous [2] 84/7 84/9
mother... [7] 40/12 40/13 42/15 44/7 46/8 46/23 47/2 mother's [7] 16/4 32/16 43/8 45/16 50/11 50/13 60/11 motion [110] 1/12 3/22 3/23 4/11 4/11 4/16 4/17 5/4 5/6 5/20 5/21 6/10 11/23 12/10 16/18 16/25 17/17 18/15 21/11 22/5 22/7 23/17 23/19 24/2 24/9 26/8 26/8 26/9 26/10 26/12 26/14 27/16 28/18 28/18 28/21 28/22 28/23 29/1 29/3 29/9 29/10 29/12 32/4 33/10 34/13 39/25 40/9 40/15 42/6 42/11 43/18 43/19 43/23 44/23 44/24 45/12 45/14 47/9 48/4 48/8 48/9 48/12 48/14 48/21 74/10 74/13 74/15 74/19 75/3 76/6 76/11 78/2 78/6 78/8 79/12 79/15 79/16 79/17 79/18 79/24 80/6 80/7 80/8 80/13 80/14 80/17 80/20 80/22 80/25 81/17 81/19 82/20 83/4 83/11 83/13 83/15 83/18 83/19 83/22 83/24 84/4 84/5 84/22 85/3 85/7 85/9 86/3 87/16 87/17 89/18 motions [8] 75/22 78/5 83/25 84/7 84/9 86/14 87/4 88/7 mouth [1] 75/10 move [2] 31/1 85/23 moved [1] 38/19 moving [1] 83/7 Mr [34] 15/24 28/17 34/16 35/4 35/10 35/11 35/12 35/15 35/15 35/25 36/1 36/1 36/13 36/16 36/19 36/21 37/10 37/12 37/15 37/18 38/7 38/17 39/3 39/15 39/20 39/23 40/5 40/12 45/20 46/8 47/1 65/8 68/8 74/22 Mr. [103] 3/13 3/14 3/18 3/19 3/25 4/15 4/23 5/21 8/17 11/16 18/4 18/22 19/16 19/18 19/21 20/12 20/14 20/20 22/20 24/6 28/3 29/3 30/6 30/16 31/2 31/3 31/5 31/6 31/19 32/4 35/6 36/2 37/4 37/24 38/4 38/11 38/15 39/15 40/11 40/21 41/21 42/4 42/16 42/22 45/10 45/22 46/12 47/23 48/20 49/10 49/17 50/25 51/15 52/9 52/9 53/23 54/8 54/15 56/20 57/7 57/20 58/15	61/15 61/20 62/8 62/17 63/13 63/25 64/2 64/8 64/16 65/22 66/20 66/24 66/25 67/10 67/11 67/22 68/4 68/17 68/18 68/19 68/20 68/21 69/15 70/17 71/5 72/11 72/13 72/17 74/10 80/2 80/16 81/10 81/20 83/20 85/3 85/6 86/4 86/23 89/5 89/7 89/9 Mr. Adelstein [1] 8/17 Mr. Agent [1] 64/8 Mr. Brooks [5] 66/20 66/25 67/22 68/18 68/21 Mr. Brooks' [1] 67/11 Mr. Carlos [2] 38/15 42/16 Mr. Colon [3] 38/4 39/15 40/11 Mr. Duarte [3] 19/18 19/21 20/12 Mr. Fred [1] 66/24 Mr. Hunt [1] 41/21 Mr. Kreiss [5] 3/19 20/20 31/2 31/3 89/7 Mr. Naverette [3] 68/4 68/19 68/20 Mr. Scotton [70] 3/13 3/14 3/18 3/25 4/15 4/23 5/21 11/16 18/22 19/16 20/14 22/20 24/6 28/3 29/3 30/6 30/16 31/5 31/6 31/19 32/4 37/4 37/24 38/11 40/21 42/4 42/22 45/10 45/22 46/12 47/23 48/20 49/10 49/17 50/25 51/15 52/9 52/9 53/23 54/8 54/15 56/20 57/7 57/20 58/15 61/15 61/20 62/8 63/25 64/2 64/16 65/22 67/10 68/17 69/15 70/17 71/5 72/17 74/10 80/2 80/16 81/10 81/20 83/20 85/3 85/6 86/4 86/23 89/5 89/9 Mr. Scotton's [5] 18/4 62/17 63/13 72/11 72/13 Mr. VanBrunt [1] 36/2 Mrs [2] 35/15 39/16 Mrs. [1] 37/19 Mrs. Colon [1] 37/19 Ms [3] 22/19 63/24 89/3 Ms. [21] 10/22 16/24 48/15 49/3 51/14 58/11 58/24 59/22 60/23 61/3 73/4 74/6 74/11 75/19 79/19 84/21 85/8 85/13 89/9 89/12 89/15 Ms. Mitrani [20] 10/22 16/24 48/15 49/3 51/14 58/11 58/24 59/22 61/3 73/4 74/6 74/11 75/19 79/19 84/21 85/8 85/13 89/9 89/12 89/15 Ms. Mitrani's [1]	N N-A-V-E-R-E-T-T-E [1] 63/12 name [13] 51/11 60/20 61/9 61/24 61/25 62/1 63/11 63/12 66/10 66/18 70/11 72/11 85/19 named [2] 65/16 67/11 names [2] 79/8 79/9 nature [1] 36/4 Naverette [6] 63/12 67/23 68/1 68/4 68/19 68/20 necessarily [3] 52/7 60/5 85/24 need [27] 4/3 5/5 6/8 6/22 7/9 16/19 20/19 22/15 22/20 27/9 33/2 44/18 46/17 46/23 47/4 47/24 51/9 55/3 77/14 77/24 77/24 79/6 83/22 85/14 86/25 88/21 88/24 needless [2] 35/16 82/25 needs [2] 65/18 82/1 Neighbors [1] 32/13 never [21] 17/7 21/10 21/10 36/25 37/1 37/1 44/1 44/1 44/6 45/2 50/24 52/8 52/12 54/1 59/1 59/2 72/7 72/9 75/23 75/23 81/24 new [2] 83/13 88/14 night [1] 35/25 No. [31] 3/24 4/9 4/13 5/6 9/25 24/7 26/10 26/15 26/21 26/22 32/1 48/11 48/13 51/1 58/1 59/20 61/14 62/9 62/9 62/12 63/2 63/8 63/9 63/19 65/16 67/18 68/20 68/21 71/7 80/15 83/17 No. 1 [4] 62/9 63/2 67/18 68/21 No. 157 [2] 80/15 83/17 No. 16 [2] 26/21 26/22 No. 164 [1] 26/10 No. 170 [2] 3/24 4/9 No. 178 [1] 48/11 No. 185 [3] 4/13 5/6 24/7 No. 187 [1] 26/15 No. 188 [1] 48/13 No. 2 [12] 32/1 58/1 59/20 61/14 62/9 62/12 63/8 63/9 63/19 65/16 68/20 71/7 No. 3 [1] 9/25 No. 437 [1] 51/1 No.1 [1] 59/19 nobody's [1] 70/11 nonsense [2] 33/14 45/9 normal [1] 37/2 notations [1] 63/6 noted [1] 84/7	notice [4] 72/14 87/8 87/9 87/13 notices [3] 87/10 87/11 87/12 notify [1] 89/1 November [2] 84/16 84/18 November 4 [1] 84/16 November 4th [1] 84/18 number [21] 3/5 6/12 7/7 7/16 10/6 10/21 14/13 15/3 17/17 18/13 19/4 19/5 19/18 21/19 31/12 31/14 54/20 55/5 55/5 59/2 63/7 number three [1] 10/21 numbers [1] 14/12 numerous [2] 84/7 84/9
			O o'clock [1] 85/1 Oakland [1] 55/4 oath [1] 75/7 object [3] 45/18 49/8 54/5 objected [1] 81/6 objection [4] 30/8 31/6 67/15 70/15 objections [1] 31/18 objects [1] 82/25 obligations [2] 20/17 20/21 obtain [2] 37/25 40/16 obtained [3] 53/14 61/14 69/19 obviously [2] 52/5 57/22 occasions [2] 36/2 37/22 occurred [4] 39/13 39/21 39/22 42/10 October [3] 1/8 84/14 84/17 October 30 [1] 84/14 office [11] 51/10 51/17 53/16 55/4 55/5 58/11 58/24 59/2 59/22 62/7 74/6 officer [3] 63/11 67/9 67/12 officers [1] 32/15 official [6] 1/24 13/25 54/13 61/6 61/9 65/16 officials [1] 53/13 oh [2] 13/8 56/1 Okay [37] 4/2 6/16 9/3 13/3 13/13 15/3 16/23 17/24 18/13 19/4 21/2 21/18 23/16 27/1 28/2 29/25 33/23 36/9 39/12 41/13 43/15 44/16 46/19 47/11 52/2 53/15 54/4 54/25 61/16 68/3 68/24 69/21 71/4 71/17 72/19 73/13 85/2 old [2] 32/11 32/19 ones [1] 59/23 open [1] 11/10 opportunity [2] 47/8 66/2 options [1] 4/2

O	<p>people's [1] 62/20 perfectly [4] 57/8 57/11 58/5 58/6 performing [1] 35/8 period [1] 84/15 permanent [2] 10/25 24/24 permit [1] 65/19 person [3] 9/7 14/20 77/21 personal [3] 7/23 9/13 67/21 petition [1] 81/16 phone [4] 46/20 46/21 64/22 78/17 phoning [1] 88/19 photographs [10] 5/22 7/17 7/25 8/20 8/24 17/25 18/3 18/6 18/8 23/24 photos [1] 18/10 physical [1] 37/1 pictures [5] 7/20 7/22 7/23 9/13 28/13 piece [6] 6/4 6/24 7/8 7/9 7/11 7/14 place [3] 9/21 36/14 76/7 Plaintiff [1] 1/5 playing [1] 17/12 pleading [3] 12/17 18/20 85/24 pleadings [1] 85/24 please [11] 11/19 14/5 29/9 38/13 50/21 54/8 61/21 61/24 66/5 74/2 86/20 plenty [5] 40/10 40/11 40/12 40/23 40/24 point [15] 10/20 23/1 34/25 42/24 43/1 48/3 49/22 54/6 57/5 58/10 74/21 77/11 81/22 82/1 82/9 pointed [1] 85/16 police [2] 14/21 32/15 policy [1] 56/10 portion [1] 17/18 portions [2] 6/14 17/22 position [2] 15/16 19/9 positive [1] 45/4 possession [4] 23/21 27/17 53/11 62/11 possibility [2] 40/4 81/11 post [1] 81/24 postponed [1] 37/17 potentially [1] 5/15 power [2] 77/9 77/10 precise [2] 40/18 81/9 prefer [1] 7/2 prejudice [5] 40/3 40/15 42/14 47/9 48/6 prepare [1] 82/16 prepared [12] 9/22 17/5 58/7 66/13 67/24 68/1 68/5 68/10 68/11 68/20 68/21 77/25 present [24] 3/13 6/5 13/14 16/21 29/9 30/19</p>	<p>42/15 45/25 46/4 48/23 48/25 49/19 52/11 59/22 65/15 66/24 66/25 70/9 70/10 70/12 70/13 74/18 77/8 87/2 presented [6] 9/18 22/9 27/21 27/23 27/25 81/10 presenting [1] 59/16 pressure [1] 45/2 pretend [1] 7/12 pretrial [16] 7/21 10/1 10/3 18/13 18/14 22/12 22/25 23/1 23/3 23/8 25/24 51/4 52/20 81/7 81/11 81/17 prevent [3] 20/23 50/18 85/20 previous [1] 21/5 previously [2] 24/4 81/21 prior [2] 27/12 81/21 privately [1] 36/16 pro [9] 1/19 3/13 14/4 78/22 80/15 80/21 83/5 83/16 83/20 Probably [1] 5/7 probative [1] 40/18 problem [6] 21/3 21/19 28/9 39/17 50/6 88/10 problems [1] 50/8 procedural [1] 23/6 procedurally [3] 10/24 45/24 47/5 Procedure [2] 20/18 38/2 proceed [4] 3/21 26/6 26/7 48/3 proceeding [4] 6/21 55/14 78/19 78/22 proceedings [1] 90/7 produce [3] 20/15 28/4 40/4 produced [19] 12/18 12/20 13/23 18/21 18/24 18/24 19/2 19/12 22/23 23/11 24/4 24/5 25/7 25/8 25/11 27/12 66/17 69/12 83/9 professional [2] 44/9 90/5 proffer [4] 46/8 46/10 46/15 60/23 proffered [2] 11/5 52/8 prominent [1] 17/12 prominently [1] 73/17 pronounce [1] 5/3 proof [6] 39/18 40/9 57/1 75/1 86/8 88/8 proper [2] 72/23 72/24 properly [1] 47/4 prosecuting [1] 67/2 prosecution [3] 23/3 56/22 75/20 prosecutor [13] 16/23 22/11 43/25 48/10 48/21 54/6 59/16 59/25 65/25 69/24 75/6 76/14 79/13 prosecutorial [6] 26/12 28/25 32/6 40/2</p>	<p>42/13 43/21 protestor [1] 9/15 provide [2] 66/14 66/20 provided [10] 9/6 24/12 28/14 63/18 63/19 66/10 66/18 66/21 66/25 69/18 provides [1] 58/3 public [5] 24/19 25/9 25/10 25/12 85/25 publicly [2] 3/24 4/6 pull [2] 9/21 32/18 purple [1] 30/13 purporting [1] 19/25 purpose [2] 49/17 53/25 purposes [1] 26/7 put [8] 4/9 41/6 45/22 55/6 56/10 57/17 59/10 66/1</p>
P	<p>p.m. [3] 1/9 84/14 84/17 packages [5] 35/13 35/13 35/16 38/1 44/8 packets [1] 7/14 page [6] 2/2 25/2 51/20 51/21 63/1 63/9 Page 7 [1] 25/2 pages [8] 22/25 24/25 25/4 26/13 29/4 52/16 66/22 81/12 Pages 16 [1] 81/12 paid [1] 44/2 Palm [4] 1/8 1/25 88/12 88/16 paper [4] 24/9 24/11 24/13 24/21 papers [6] 12/3 44/15 44/15 50/9 74/18 77/6 paperwork [6] 4/20 4/22 12/6 14/6 55/4 56/11 paragraph [3] 6/12 9/25 10/12 Paragraph 3 [1] 10/12 parents [1] 88/10 Park [1] 55/5 part [14] 15/9 22/23 31/19 43/16 52/13 54/3 59/16 63/21 66/16 70/8 72/12 77/5 83/25 84/3 parte [5] 3/25 4/4 78/4 80/13 89/18 particular [1] 43/22 parts [2] 30/8 33/23 parts [1] 54/15 pass [1] 14/10 passed [1] 74/1 patience [1] 70/22 Patrick [4] 41/5 41/5 41/21 88/14 pay [5] 32/22 44/2 44/3 44/3 44/4 payable [1] 35/11 pending [1] 26/3 people [9] 6/6 9/1 32/13 33/3 33/8 44/13 79/9 81/24 88/23</p>	<p>quash [15] 26/10 26/14 28/18 28/23 29/2 29/10 32/5 34/3 34/13 39/25 42/11 43/19 45/12 45/14 48/4 quashed [1] 32/9 question [20] 11/20 12/23 13/16 34/10 38/13 58/9 58/15 59/18 59/19 63/14 64/15 64/17 66/2 66/4 67/5 68/15 68/22 70/17 72/23 72/24 questions [16] 7/12 17/14 36/20 42/24 43/4 49/23 61/13 63/25 64/2 68/8 69/15 71/8 71/9 73/1 73/4 73/21 quickly [1] 61/20 quite [2] 35/14 51/19</p>	
		Q	
		R	
		<p>R-I-H-A-B [1] 72/12 race [2] 44/9 50/12 racing [2] 44/8 50/12 raise [2] 77/22 82/17 raised [3] 72/1 73/20 74/25 read [11] 4/17 24/21 27/1 29/3 29/8 41/7 41/10 41/14 42/9 74/13 74/13 readdressed [1] 81/22 reading [1] 15/15 real [3] 49/20 70/13 71/3 really [11] 17/14 32/24 42/10 44/19 50/7 60/1 78/24 78/25 82/9 83/13 86/17 Realtime [1] 90/6 reason [4] 41/9 44/13 65/6 78/18 reasonable [10] 57/8 58/5 58/6 80/14 80/20 81/19 82/1 82/11 83/4 83/16 reasons [2] 11/7 45/18 reassigned [1] 81/15</p>	

R	relief [3] 42/7 48/14 48/17	57/23 80/16	says [4] 13/6 30/13 31/12 54/22
recall [3] 6/6 15/15 70/2	rely [3] 73/13 80/3 82/7	reviews [1] 80/11	scenario [1] 64/20
receipts [2] 9/13 28/14	remain [1] 5/13	riddled [1] 85/19	schedule [1] 80/1
receive [12] 10/5 34/12 39/8 44/7 62/22 69/2 69/24 69/25 71/13 75/23 75/23 87/10	remember [5] 6/6 7/11 8/9 73/16 73/18	right [111] 3/7 3/19 4/9 4/25 5/20 7/2 7/16 8/3 8/8 9/25 10/6 11/15 12/1 12/12 12/25 13/2 14/1 14/2 14/11 15/14 16/17 17/11 17/16 19/16 19/20 20/14 21/4 21/24 22/17 23/7 23/9 23/10 23/13 23/17 24/14 26/2 26/5 26/20 27/9 28/3 30/13 31/10 31/12 31/15 31/21 32/24 34/3 34/6 34/8 36/7 38/3 38/9 38/18 40/9 40/21 42/22 43/18 44/11 45/24 46/3 46/14 46/20 46/21 47/3 47/6 48/1 48/20 49/2 49/9 49/10 49/15 50/15 50/20 50/25 51/14 52/18 53/3 53/6 53/8 54/14 54/18 60/4 62/5 62/22 62/24 63/8 63/23 64/11 65/10 68/6 70/9 72/3 72/16 73/3 73/22 74/3 78/20 82/19 82/22 83/3 83/21 84/3 84/12 85/13 86/2 86/17 88/2 88/25 89/2 89/9 89/15	scheduled [5] 75/24 77/12 77/13 84/15 84/19
received [28] 2/7 24/20 32/2 38/3 38/6 47/25 51/17 52/12 55/15 55/17 55/18 55/19 55/19 56/19 63/10 65/13 65/14 65/16 67/3 67/3 69/22 70/6 70/24 71/7 71/7 71/14 72/7 72/14	removal [3] 18/3 18/5 48/10	right-hand [1] 30/13	scintilla [1] 79/14
receiving [2] 77/21 87/13	remove [10] 48/9 48/15 48/16 48/21 48/22 74/11 79/13 79/13 79/19 79/19	Rihab [1] 72/11	scope [2] 35/18 67/16
receptacle [1] 61/18	removed [5] 7/17 8/21 12/6 17/25 75/20	risk [1] 81/3	SCOTTON [79] 1/7 3/5 3/13 3/14 3/18 3/25 4/15 4/23 5/21 11/16 15/24 18/22 19/13 19/16 20/14 22/20 24/6 26/10 28/3 28/17 29/3 30/6 30/16 31/5 31/6 31/19 32/4 37/4 37/24 38/11 40/21 42/4 42/22 45/10 45/22 46/12 47/23 48/20 49/10 49/17 50/25 51/15 52/9 52/9 53/23 54/8 54/15 56/20 57/7 57/20 58/15 61/15 61/20 62/8 63/25 64/2 64/16 65/8 65/22 67/10 68/8 68/17 69/15 70/17 71/5 72/17 74/10 74/22 80/2 80/16 81/10 81/20 83/20 85/3 85/6 86/4 86/23 89/5 89/9
reciprocal [2] 20/16 20/21	repeated [2] 86/4 86/7	ROGERIO [4] 1/7 3/5 48/8 79/12	scottion's [9] 18/4 28/18 39/25 48/9 62/17 63/13 72/11 72/13 79/12
recollection [3] 71/14 72/10 73/19	repeatedly [2] 23/20 52/14	role [1] 17/12	seal [2] 3/24 4/4
recommend [1] 40/3	rephrase [1] 68/23	room [1] 8/4	sealed [3] 4/8 79/7 89/17
Recommendation [1] 79/17	report [14] 10/1 10/3 10/7 10/13 18/14 22/25 23/1 26/19 64/8 64/13 64/13 64/21 64/21 79/16	ROSENBAUM [21] 1/2 3/6 8/7 8/13 9/9 15/7 15/12 21/1 31/15 37/11 41/11 42/5 81/14 83/12 83/25 84/5 84/17 84/20 85/7 85/10 89/14	second [11] 3/6 9/10 17/24 22/5 24/23 31/13 33/17 49/25 52/23 53/10 53/22
recommending [1] 79/17	represent [1] 86/15	Rosendale [3] 6/22 6/23 39/10	seconds [2] 36/8 36/10
reconsideration [1] 83/2	representation [1] 23/20	routine [2] 41/23 42/3	Security [1] 57/17
reconsidered [1] 83/1	represented [3] 21/13 27/8 52/10	Roy [3] 3/11 61/23 62/1	see [18] 9/23 12/3 12/13 12/16 22/8 22/15 27/9 29/16 30/5 34/9 35/21 49/6 50/15 57/5 57/8 75/1 75/17 82/9
record [14] 13/25 24/20 25/12 31/19 47/10 52/14 54/16 56/21 59/10 61/25 78/19 85/19 85/25 90/7	representing [1] 86/15	rule [4] 5/2 5/10 33/6 34/2	seek [3] 20/23 43/21 79/3
recorded [2] 6/14 17/19	request [8] 6/16 7/7 8/19 17/11 17/17 17/24 20/15 79/19	Rule 1617 [1] 33/6	seeking [8] 4/17 5/23 6/13 6/19 10/3 19/1 21/12 49/18
records [3] 33/7 81/1 84/23	requested [2] 23/25 62/17	rules [5] 20/17 20/19 38/2 75/12 75/13	seen [8] 9/1 17/7 21/10 21/10 29/12 35/10 35/11 64/8
recover [1] 38/25	requesting [3] 27/18 34/20 48/14	rulings [1] 81/9	send [9] 39/10 43/7 43/9 44/13 51/10 53/21 58/13 59/8 60/9
recused [1] 41/20	requests [4] 16/25 20/1 32/14 84/6	run [1] 37/3	sending [2] 32/13 45/5
refer [1] 60/24	require [2] 5/4 6/20	S	sense [5] 37/2 52/16 59/9 70/24 71/4
reference [2] 19/18 41/22	required [1] 37/17	sake [1] 59/25	sent [16] 11/8 11/8 16/4 38/19 39/9 50/24 52/16 53/2 53/25 54/2 54/13 54/13 60/19 63/15 67/4 80/23
referenced [1] 24/2	reread [1] 21/22	sanction [6] 26/11 28/24 32/6 40/1 42/12 43/20	separate [2] 27/15
referencing [1] 70/3	resident [2] 11/1 24/24	sanctioned [1] 32/8	
referred [6] 10/1 10/13 15/11 18/14 41/19 41/21	resolves [1] 89/2	sat [1] 36/20	
referring [5] 19/17 23/4 23/5 31/1 33/15	respect [1] 88/4	saw [2] 8/3 72/9	
refused [2] 41/3 41/4	respectful [1] 36/22	saying [14] 8/23 14/25 22/25 24/10 26/20 33/18 38/20 44/10 55/14 67/2 68/10 68/11 76/23 86/22	
refusing [1] 15/1	respond [4] 16/24 22/20 34/23 50/21		
regard [1] 52/13	responded [4] 6/17 26/13 27/19 29/1		
regarding [7] 16/18 19/3 20/11 39/13 45/11 75/18 89/18	response [23] 4/13 4/18 10/18 11/23 12/10 17/1 18/15 18/17 19/8 19/8 21/22 21/24 24/18 29/1 29/9 34/9 34/13 38/4 45/17 48/12 72/19 74/14 82/22		
Registered [1] 90/5	responses [1] 20/21		
regulation [1] 34/2	retain [1] 82/17		
relate [1] 50/1	retial [1] 10/13		
related [1] 64/17	return [3] 8/10 35/15 35/16		
relating [1] 19/21	returned [1] 70/4		
release [2] 81/11 83/11	review [10] 8/8 8/14 34/12 40/7 44/14 47/14 47/15 81/1 81/16 83/12		
relevance [1] 84/23	reviewed [3] 32/3		
relevant [2] 40/18 43/22			
relied [5] 23/9 71/21 71/24 71/25 72/2			

S	53/5 53/9 57/1 57/11 58/21 60/5 61/11 62/8 64/10 64/16 64/25 65/4 67/5 75/11 76/24 78/11 78/15 78/22 78/25 80/17 85/5 85/12 86/7 86/11 86/19 87/18 87/22 88/1 89/24 sitting [5] 8/2 38/18 44/14 76/6 77/18 situation [5] 25/6 27/22 33/4 39/12 46/7 slower [1] 6/8 Snow [18] 7/22 10/10 13/10 25/23 27/2 27/13 27/21 42/1 50/18 52/13 52/21 55/24 63/14 71/16 71/20 72/8 81/3 83/8 Snow's [3] 27/6 72/1 83/12 so draft [1] 55/2 so-called [2] 16/8 20/11 somebody [3] 60/6 68/11 86/18 soon [2] 78/5 78/16 sorry [3] 28/19 29/8 71/23 sorts [1] 37/23 sotto [2] 31/9 79/5 South [1] 39/11 SOUTHERN [1] 1/1 span [1] 29/22 speak [5] 6/8 36/22 58/19 58/21 76/11 speaking [2] 18/7 18/25 speaks [1] 33/5 special [4] 3/11 20/2 53/12 62/6 specific [1] 8/19 specifically [4] 6/5 8/16 45/13 83/8 speedy [1] 84/8 spell [2] 61/25 77/1 spelled [1] 77/2 spelling [1] 51/12 spend [1] 76/10 spoke [8] 22/11 22/11 25/24 49/20 64/8 64/21 68/18 68/19 stage [1] 28/3 stamp [1] 13/8 stamped [1] 49/12 stand [12] 3/18 5/8 17/2 42/23 42/25 49/23 61/13 61/21 65/6 66/1 75/7 88/5 stand-by [1] 3/18 standby [6] 1/20 26/18 31/9 48/2 79/5 87/9 start [5] 28/20 32/13 32/13 77/24 84/18 started [1] 20/8 starting [2] 22/24 84/15 state [4] 40/15 58/22 58/22 61/24 stated [4] 45/19 52/3 52/15 72/8 statement [5] 22/2	35/10 41/17 43/25 44/11 statements [2] 21/20 44/10 states [13] 1/1 1/4 1/17 3/4 3/10 14/1 14/1 31/15 41/21 42/8 62/21 64/12 76/21 stating [2] 28/9 51/7 status [7] 10/24 18/10 24/24 60/11 62/21 63/17 64/12 stay [3] 16/5 56/2 87/14 staying [1] 44/23 steal [1] 16/10 step [9] 5/10 29/13 30/20 43/8 44/1 44/2 45/1 46/20 73/23 step-dad [7] 29/13 30/20 43/8 44/1 44/2 45/1 46/20 stepfather [5] 29/7 29/8 33/21 35/1 46/23 stick [1] 44/16 stole [1] 82/3 store [1] 45/7 story [1] 11/3 Street [1] 1/24 streptitous [1] 6/14 strike [3] 19/2 85/23 86/3 strong [1] 45/5 Stuart [3] 8/10 8/16 9/12 stuff [4] 9/2 33/7 33/13 51/20 subject [5] 20/7 35/14 84/23 89/5 89/13 subjective [1] 36/6 submission [4] 11/14 34/11 35/3 37/5 submit [4] 13/23 40/7 40/16 59/14 submitted [1] 18/8 subpoena [34] 26/11 26/14 28/19 28/24 29/2 29/5 29/11 29/13 30/19 30/22 31/11 31/13 32/1 32/5 32/8 33/5 33/6 33/16 33/17 33/18 34/13 36/5 36/17 36/18 36/23 37/8 39/14 40/1 42/12 43/20 44/25 45/12 46/2 48/4 subpoenas [19] 29/25 30/12 31/3 31/7 31/16 31/19 31/22 32/1 32/8 33/15 33/24 34/4 34/6 34/20 35/20 35/23 38/5 43/12 45/14 subsequent [3] 56/25 57/23 79/24 sufficient [5] 40/7 42/18 46/24 47/10 47/18 sufficiently [1] 40/18 suggest [1] 20/19 Suite [1] 1/24 superseding [1] 3/6 supervised [1] 67/9 support [15] 7/19 7/24	28/10 45/20 47/21 48/5 48/7 58/10 60/8 74/7 79/15 80/8 86/20 88/1 88/8 supported [4] 41/15 47/7 60/7 86/12 supports [1] 79/23 sure [8] 14/10 20/20 29/20 30/25 60/3 72/2 77/10 87/15 surgery [1] 38/25 surreptitious [1] 17/19 suspicion [1] 86/13 suspicious [3] 71/9 75/10 75/11 sustained [1] 70/16 SWAT [3] 16/4 43/6 43/7 SWORN [1] 61/23 syncs [1] 84/10 system [3] 50/16 57/13 57/14
		T	
		table [1] 3/11 take [13] 14/5 29/5 29/18 41/13 42/9 44/12 49/2 49/9 56/9 61/12 61/19 61/21 78/14 taken [3] 21/14 23/24 41/16 takes [1] 86/6 talk [2] 46/13 48/2 talked [2] 14/21 36/20 talking [9] 8/17 8/19 14/14 21/25 22/1 25/13 27/21 32/13 44/17 tampered [1] 20/10 tax [1] 32/22 team [2] 23/3 43/6 teams [1] 16/4 telephone [1] 64/22 tell [14] 4/6 4/15 8/22 10/23 18/6 21/8 22/22 24/16 70/3 74/23 79/2 84/12 86/5 86/11 telling [2] 43/5 51/7 ten [2] 36/7 36/21 terminated [1] 55/22 testified [10] 6/6 65/13 68/18 68/19 71/6 71/17 72/6 72/7 72/12 73/13 testify [25] 6/1 7/4 14/23 16/22 27/25 28/12 31/11 31/13 32/23 38/20 38/23 39/22 39/22 42/20 45/21 46/20 55/12 71/19 75/25 76/4 76/16 76/17 78/9 78/10 88/11 testifying [1] 77/18 testimony [7] 61/19 68/13 68/22 71/5 72/13 74/3 87/22 Thank [18] 4/25 31/24 38/9 54/14 63/8 63/23 68/6 72/16 73/3 73/22 73/24 74/2 89/12 89/15 89/20 89/21 89/24 90/1 themselves [1] 76/12	

T	44/24 45/2 60/12 68/23 77/20 82/16	USA [3] 7/13 76/24 77/3	18/6 18/24 19/12 23/5 35/10 69/11 75/16
thing [7] 7/4 24/1 37/4 56/7 72/9 76/7 89/4	trying [19] 22/21 25/15 25/20 30/18 38/25 44/20 44/21 46/4 56/5 56/7 58/4 70/20 70/22 72/20 75/16 75/17 77/8 77/22 82/8	USCIS [7] 22/24 23/11 51/1 54/2 61/6 63/7 73/8	websites [2] 35/8 35/8 week [1] 84/15 weeks [1] 14/22 weight [1] 74/18
things [9] 6/5 6/10 9/5 9/22 28/6 28/8 55/3 56/11 76/15	turn [11] 6/20 15/1 15/8 16/23 17/11 21/16 23/21 23/22 27/18 34/8 63/25	USCIS437 [4] 49/13 50/22 52/19 56/15	well [46] 5/4 5/25 8/9 8/12 9/16 12/19 15/10 15/14 17/4 17/16 18/20 19/11 21/8 22/6 26/5 26/25 28/2 28/5 28/7 29/15 34/17 34/17 38/22 39/10 39/12 39/16 41/13 44/20 44/23 46/11 47/13 48/1 49/24 55/16 57/20 60/1 71/4 71/18 74/22 78/2 78/18 78/19 79/6 82/24 87/7 87/23
think [28] 16/12 23/5 23/8 26/13 28/20 29/23 36/6 36/17 37/4 37/9 43/14 45/23 45/24 47/4 47/19 54/20 54/22 60/6 68/6 68/18 68/21 77/2 80/18 80/18 83/20 84/25 85/1 85/22	turned [8] 15/15 18/7 18/10 18/11 20/4 20/5 52/4 52/5	USCIS701 [3] 49/15 52/24 56/16	went [10] 8/3 33/12 34/15 35/25 36/14 39/1 46/9 52/8 59/1 81/8
thought [1] 11/4	turning [1] 37/24	use [1] 50/18	were [28] 8/12 18/18 28/20 28/20 28/23 29/25 30/1 31/22 35/21 35/23 37/19 39/3 45/21 46/8 51/21 59/23 62/5 63/3 63/3 65/7 65/11 65/12 70/5 73/10 74/5 75/17 78/3 87/20
threatened [4] 34/5 34/15 34/16 46/9	turnover [6] 4/12 4/16 6/11 21/12 23/18 28/21	utilize [1] 20/18	West [4] 1/8 1/25 88/12 88/16
threatening [1] 46/17	Turns [1] 11/7	V	whatsoever [3] 39/19 71/6 75/9
threating [1] 34/25	two [51] 4/2 5/17 7/16 9/16 9/17 9/17 27/23 29/25 30/1 30/1 30/11 30/24 31/3 31/6 31/16 31/19 31/22 32/7 33/15 34/4 34/23 37/9 38/5 43/12 48/25 49/17 50/1 52/15 52/16 53/18 54/15 55/3 55/6 58/12 59/20 64/17 65/19 65/25 66/3 66/7 71/2 71/10 71/15 74/1 74/9 75/6 76/1 78/12 84/15 85/25 87/20	V-A-N-B-R-U-N-T [1] 62/2	wholly [1] 45/23
three [11] 8/2 10/6 10/21 14/12 18/13 21/19 25/4 32/16 43/7 43/9 71/15	two-week [1] 84/15	VA [1] 36/14	WILLIAM [1] 1/13
Thursday [3] 32/16 43/7 43/11	type [1] 86/19	Valle [1] 41/20	Williams [9] 37/6 37/7 37/8 63/22 81/9 81/9 81/13 81/23 83/8
time [35] 3/21 7/3 8/9 9/21 11/3 20/24 27/5 34/25 40/10 40/11 40/12 40/24 40/24 41/14 42/1 42/9 44/12 44/12 45/8 47/8 51/4 53/8 55/8 56/8 56/9 56/10 61/1 69/9 70/4 71/10 72/5 72/6 76/13 79/8 84/24	U	VanBrunt [48] 3/11 5/8 5/10 6/4 6/14 15/4 16/9 17/19 19/6 19/22 24/3 35/24 36/2 36/4 36/14 36/15 36/22 37/15 37/16 37/18 38/7 45/11 45/13 45/22 46/10 47/3 48/11 48/16 48/22 49/22 50/10 53/12 53/17 61/3 61/5 61/8 61/12 61/17 61/23 62/1 62/5 64/8 73/7 74/7 75/20 77/5 79/14 79/20	willing [3] 38/20 82/12 82/13
times [3] 32/25 52/3 79/1	U.S [1] 1/14	vanish [1] 9/12	window [1] 32/18
tired [2] 32/12 44/19	unclear [2] 11/7 19/1	vehicle [1] 37/25	wish [7] 29/10 40/4 42/15 48/3 48/23 54/15 75/18
today [11] 3/21 20/9 30/9 38/21 38/22 59/14 76/2 76/3 77/16 77/18 85/14	undated [4] 51/15 63/6 71/24 72/9	venue [3] 37/5 37/9 37/10	wished [1] 45/11
told [13] 7/13 8/16 22/12 32/23 33/10 36/23 37/16 39/23 39/23 46/17 67/23 68/1 76/16	undercover [1] 20/3	verbal [1] 37/1	wishes [1] 61/15
town [1] 44/8	understand [30] 8/15 20/24 24/10 25/12 25/20 33/23 33/25 34/2 39/7 40/21 41/2 42/22 46/6 64/15 64/16 67/2 67/5 67/8 71/23 72/20 82/1 85/11 85/21 86/2 86/23 86/24 86/25 88/1 88/3 88/13	versus [1] 3/5	withdrawn [1] 41/23
transcript [3] 1/12 15/16 90/7	understandable [1] 57/16	video [23] 6/4 6/14 6/23 6/23 6/24 7/15 9/6 14/23 15/4 15/7 15/9 16/8 16/20 17/19 17/22 19/6 19/22 20/2 20/2 20/5 24/3 28/6 28/8	witness [19] 2/2 5/16 6/1 6/25 35/11 56/6 61/23 73/25 74/19 75/25 76/9 77/12 77/14 77/20 80/2 86/21 87/1 87/5 88/6
transcription [1] 69/23	understanding [6] 54/12 66/12 66/15 67/12 68/22 76/23	visit [1] 39/5	witnesses [9] 5/3 5/5 5/5 5/19 77/17 78/8 78/10 78/15 80/2
transfer [1] 76/7	unethical [1] 85/21	visitations [1] 77/21	words [1] 86/22
travel [1] 50/12	unfair [1] 56/12	voice [2] 31/9 79/5	work [4] 37/3 38/24 44/6 44/6
trial [33] 9/23 14/24 20/18 20/24 30/1 31/11 31/14 33/24 33/25 34/22 35/20 35/22 36/12 36/17 36/18 36/23 37/3 37/7 37/15 37/16 66/5 78/1 82/9 82/10 82/16 83/23 84/4 84/6 84/8 84/9 84/14 84/18 85/9	unintelligible [2] 76/18 76/22	W	worked [1] 44/1
trials [2] 30/1 35/21	UNITED [10] 1/1 1/4 1/17 3/4 3/10 41/21 42/8 62/21 64/12 76/21	wait [3] 24/23 54/8 64/14	working [1] 11/6
tried [5] 6/4 19/7 41/2 41/4 45/25	unsigned [3] 71/21 71/24 72/9	walk [1] 30/23	works [2] 36/13 42/3
true [5] 8/14 15/10 43/25 51/8 87/22	unsubstantiated [1] 58/10	want [28] 4/15 4/23 11/21 13/1 13/20 13/21 13/21 15/6 15/8 16/24 22/8 22/18 29/19 32/16 34/25 36/21 48/24 49/1 49/16 51/5 59/10 59/11 68/23 76/11 83/9 84/11 86/14 88/3	write [2] 67/6 67/8
try [9] 6/10 9/22 16/3	unsupported [2] 80/4 80/5	warrant [1] 83/2	writing [1] 21/13
	updating [1] 35/8	Washington [1] 72/21	written [4] 17/1 19/25 20/13 81/5
	upper [3] 30/13 31/12 31/15	way [15] 12/5 21/6 25/2 35/1 35/5 37/20 42/3 56/5 60/1 70/1 70/24 76/5 76/9 88/21 88/23	wrong [7] 32/21 33/2 51/11 51/12 51/12 57/19 84/13
		we've [9] 11/13 14/12	wrote [7] 44/4 44/5 64/21 67/6 67/13 67/14

W			
wrote... [1] 67/22			
Y			
Y-A-S-S-E-R [1] 63/12			
Yasser [3] 63/11 67/23 68/1			
Yeah [1] 33/21			
year [8] 32/19 35/24 36/10 36/11 36/12 36/13 37/14 39/1			
years [1] 56/5			