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9 Attorneys for Plaintiff
United States of America

10
11 **UNITED STATES DISTRICT COURT**

12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16
17 SALAM RAZUKI (1),
18 SYLVIA GONZALES (2),
and
19 ELIZABETH JUAREZ (3),
20 Defendants.

Criminal Case No. 18CR5260-CAB

**NOTICE BY THE UNITED STATES OF
POTENTIAL WITNESSES AND
EXHIBITS**

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22 COMES NOW, UNITED STATES OF AMERICA, by and through its counsel
23 Robert S. Brewer, Jr., United States Attorney, and Fred Sheppard and Shital Thakkar,
24 Assistant United States Attorneys, and pursuant to the Court's Scheduling Order, hereby
25 gives notice that the United States may call the following individuals as witnesses in this
26 matter and offer the following exhibits:
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POTENTIAL WITNESSES

- 1 Adam Ruiz
- 2 Alan Stevens
- 3 Alex Esconde
- 4 Alexander De-Armas
- 5 Alexis Vallejo
- 6 Alfonso Frias
- 7 Andre Slay
- 8 Andrew Flores
- 9 Angela Pennington
- 10 Angela Tsuida
- 11 Anna Padilla
- 12 Anthony Avilla
- 13 Ariel Faniel
- 14 Armando Milan
- 15 Ashlyn Seeley
- 16 Aslyn Seeley
- 17 Benjamin Bote
- 18 Bethany Gonzales
- 19 Bianca Gomez
- 20 Bianca Romero
- 21 Breanna Chavez
- 22 Brenan Oliver
- 23 Brenna Odoski
- 24 Brian Loveland
- 25 Brianna Gonzales
- 26 Byron Malan
- 27 Carlos Angeles
- 28 Carlos Marques
- 29 Carlos Mercado
- 30 Celena Shorees
- 31 Chris Hakim
- 32 Chris Morris
- 33 CHS 1
- 34 CHS 2
- 35 Chuck Shapiro
- 36 Claudia Taitague
- 37 Conor Loughman
- 38 Cory Altuna
- 39 Custodian of Records or other representative from Alternative Health Sunrise
- 40 Custodian of Records or other representative from AT&T

- 1 Custodian of Records or other representative from Flow Kana
- 2 Custodian of Records or other representative from Indiva Advisers
- 3 Custodian of Records or other representative from Super 5 Consulting Group
- 4 Custodian of Records or other representative from Wells Fargo Bank
- 5 Daniel Watts
- 6 Danielle Keeler
- 7 Darrell Cotton
- 8 David Farida
- 9 David Pender
- 10 Dean Bornstein
- 11 Dennise Gurfinkiel
- 12 Domenico Rigor
- 13 Eddie Martinez
- 14 Eduardo Martinez
- 15 Eileen Lara
- 16 Eileen Orozco
- 17 Elsy Iriarte
- 18 Eric Rauterkaus
- 19 Eric Van Houten
- 20 Fernando Pelayo
- 21 G. A. Reimers
- 22 Giovanna Loren Contreras
- 23 Greg Minter
- 24 Haitham Razuki
- 25 Hannah Chalpin
- 26 Hannah Mantel
- 27 Heidi Whitman
- 28 Ian Pennington
- Jackie Cruz
- Jacqueline Cruz
- Jairo Santiago
- Jake Austin
- James Huynh
- Jamie Fernandes
- Javier Nunez
- Jerry Baca
- Jesse Crim
- Jesse Stoda
- Jessica Davalos
- John Gomez

- 1 John Miller
- John Roberts
- 2 Joseph Rothrock
- 3 Josh Johnson
- Julian Sitto
- 4 Kathleen Romo
- 5 Keith Watts
- Kristine Lopez
- 6 Louis Guluppo
- 7 Mackenzie Marden
- Marilyn Muse
- 8 Marisa Bagnas
- 9 Mark (Mishel) Yousif
- Mark Gonyea
- 10 Mark Haas
- 11 Mark Merckling
- Marwan Kalasho
- 12 Matthew Botkin
- 13 Matthew Coughlin
- Matthew Roper
- 14 Michael J. Crawford
- 15 Michael McDonald
- Michael Olsen
- 16 Michael Reynoso
- 17 Michelle Hart
- N.M.
- 18 Nathaniel Dingle
- 19 Nicholas Nigro
- Nicolette Fernandes
- 20 Nicolette Fernnandes
- 21 Jean Garzanti
- Pedro Bernal
- 22 Peter Yousif
- 23 Rachana Scott
- Rachel Rowin
- 24 Regina Ho
- 25 Rohanna Nitara-Tracy
- Ruby Palos
- 26 Rulon McVay
- 27 Sami Harmis
- Sami Younan
- 28

1 Sarah George Razuki
Sarah Lawand
2 Scott Chanrachana
Stephanie Finnicum
3 Stephen Moore
4 Steve Aragon
5 Steve Elia
Sylvia Gonzales
6 Tereza Coral Malan
7 Theresa Talplacido
Timothy Lavelle
8 Tony Hobson
9 Tyler Brunhart
Tyler Stevens
10 Victor Hernandez
11 Victoria Anders
William Gardner
12 Yariel Cruz
13 Yolanda Loya
Yvonne Hernandez
14 Yvonne Lucas
15 Zuzana Drahosova

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EXHIBITS

- Recordings of telephone calls and meetings with the defendants
- Surveillance photographs and video of meetings with the defendants
- Photographs from execution of search warrants
- Physical evidence, including data and video, seized during course of search warrants
- Physical evidence seized during the arrest of the defendants
- Communications and records thereof seized from the defendants' cellular telephones, tablets, and email accounts
- Records of telephone calls involving the defendants
- Recordings of interviews of defendants
- Recordings of telephone calls, copies of written correspondence, and visitor lists for the defendants while in custody
- Currency and documents provided by the defendants to law enforcement agents or individuals operating at their behest during course of investigation
- Business records from Goldn Bloom Dispensary, Super 5 Consulting Group, Alternative Health Sunrise, Wells Fargo Bank, Indiva Advisers, and Flow Kana
- Civil court pleadings and/or transcripts from civil litigation involving the defendants and the victim
- Overhead maps and diagrams of the various locations where meetings took place as well as where search warrants were executed

DATED: April 3, 2020

Respectfully submitted,
ROBERT S. BREWER, Jr.
United States Attorney

s/ Fred Sheppard
Fred Sheppard
Assistant U.S. Attorney

s/ Shital H. Thakkar
Shital Thakkar
Assistant U.S. Attorney