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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 OF WITNESSES AND EXHIBITS
BY THE UNITED STATES**

21
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 of the witnesses and exhibits the United States anticipates calling and
26 introducing at trial in its case in chief:
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WITNESSES

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- Alex Esconde
- Alfonso Frias
- Andre Slay
- Angela Tsuida
- Bianca Gomez
- Brian Loveland
- CS1
- CS2
- Custodian of Records or other representative from Alternative Health Sunrise
- Custodian of Records or other representative from Flo Kana
- Custodian of Records or other representative from San Diego Metropolitan Correctional Center
- Custodian of Records or other representative from Indiva Advisers
- Custodian of Records or other representative from Super 5 Consulting Group
- Custodian of Records or other representative from Wells Fargo Bank
- David Farida
- Eric Van Houten
- Giovanna Contreras
- Heidi Whitman
- Ian Pennington
- Jamie Fernandes
- Jesse Stoda
- Kathleen Romo
- Keith Henderson
- Mackenzie Marden
- Marisa Bagnas
- Mark Gonyea
- Mark Haas
- Marwan Kalasho
- Matthew Coughlin
- Michael Crawford
- Michelle Hart
- Nathaniel Dingle
- Nick Hall
- Nicolette Fernandes
- N.M.
- R. Joseph Rothrock
- Sami Younan

- Sarah Lawand
- Tyler Stevens

EXHIBITS

- Recording of meeting at Great Maple on November 5, 2020
- Surveillance photographs from meeting at Great Maple on November 5, 2020
- Recording of meeting at Banbu Sushi on November 8, 2020
- Surveillance photographs of meeting at Banbu Sushi on November 8, 2020
- Audio recording from meeting at office at 3407 E Street on November 9, 2020
- United States Currency provided on November 9, 2020
- Paper provided to CS1 on November 9, 2020
- Recording from meeting at Superior Courthouse on November 13, 2020
- Surveillance photographs from meeting at Superior Courthouse on November 13, 2020
- Recording of meeting with Defendant Razuki on November 15, 2020
- Toll records for defendants for October and November 2018
- Cellphone downloads for each defendant's cellphone
- Search warrant photographs from inside Goldn Bloom Dispensary
- Search warrant photographs from inside office at 3407 E Street
- DVR system from Goldn Bloom dispensary taken during search warrant
- Security footage from Goldn Bloom on November 9, 2018, and November 15, 2020
- Photographs of CS1's phone documenting text messages exchanged with Defendants Razuki and Gonzales
- Business records from Flow Kana
- Super 5 Consulting Group partnership form for Defendant Razuki dated August 30, 2018
- Alternative Health Sunrise, dba Goldn Bloom Dispensary, Profit & Loss Statement for 2018
- Super 5 Consulting Group Profit & Loss Statement for 2018
- Super 5 Consulting Group Profit & Loss for October and November 2018
- Alternative Health Sunrise, dba Goldn Bloom Dispensary, Sales and Management Fees to Super 5 Consulting Group for 2018
- Cross complaint filed by N.M. in Case No. 37-2018-00034229, dated September 6, 2018
- September 7, 2018, Order in Case No. 37-2018-00034229 requiring Defendant Razuki to post a \$350,000 bond by September 21, 2018
- Declaration of Defendant Razuki dated June 18, 2019, filed in Bankruptcy Case 19-3164
- Photograph of Defendant Razuki's cellphone screen

- Jails calls between Defendant Gonzales and (1) Andre Slay on December 1, 2, and 4, 2018; (2) Kathy Romo on December 3, 2018, January 7, 2019, and April 23, 2019; and (3) Bethany and Giovanna on February 6, 2019.

DATED: November 30, 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