

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
26
27
28

INDEX OF EXHIBITS

United States v. Thomas Mario Costanzo

CR-17-585-PHX-GMS

Exhibit F Memorandum Dated March 12, 2018

EXHIBIT

F

Memo

TO:	MARIA WEIDNER, AFPD ZACHARY CAIN, AFPD
FROM:	LINDA J. ONDROVIC, PARALEGAL
RE:	GOVERNMENT DISCLOSURES
SUBJECT:	U.S. V. THOMAS MARIO COSTANZO
DATE:	MARCH 12, 2018
CC:	N/A

As you are aware, I was assisting AFPDs Whitaker and Castillo in trial February 27, 2018 – March 2, 2018; Re: United States v. John Roger Reed. During this time, the following disclosures were received in Mr. Costanzo's case:

02/26/18: Bates 003271-004812 (1,541 pages) disclosed pursuant to the Court's August 14, 2017 protective order.

02/27/18: Bates 004813 (CD containing 65 recorded jail calls).
Bates 004818 (CD containing 407 recorded jail calls).
Bates 004815-004832 (17 pages)

02/28/18: Bates 004833-004853 (20 pages)
Bates 004854 (DVD containing IRS video of 03/20/15 meeting)
Bates 004203-004218 (External hard drive containing digital evidence from electronic devices; **931 GB of data**).

I began processing the discovery as soon as I came in on Monday, March 5, 2018. Processing consists of OCR'ing all paper documents received. This was time consuming due to the fact that much of the discovery was handwritten letters and photos. I then have to re-Bates number everything because the case management program didn't recognize the existing Bates numbers (this doesn't happen often, but it does happen). Once OCR'd and Bates numbered, everything is copied to the external hard drive which, again, was time consuming given the 931 GB of data it contained. Next I import the all disclosures into our case management program where everything is coded and accounted for.

The above took me all day Monday (5th), Tuesday (6th), and half the day Wednesday (7th) to complete. None of the above takes into account having to print the written material, and the usual paralegal preparation which is rather intense the two weeks prior to trial.

Memo

I confirmed with Mr. Binford on Friday that the extraction reports submitted by the government on February 27th are, in fact, limited extraction reports that the government intends to use at trial. The agents applied specific filters to run those reports so none of them are complete.

The following disclosures were received late afternoon March 9, 2018:

Bates 004218: "Supplemental Files" – 550 files, 191 folders (2.01 GB of data total) mostly consisting of numerous Excel files containing internet activity and files/reports that can only be viewed via the supplied IEFrv-PortableCase.exe file.

Bates 004969: "Video Demonstration of Bitcoin Transaction". A Bitcoin transaction demonstration video (Jenks as to Agents Klepper and Ellsworth). The video is 8m 8s long.

I processed the discovery in the usual manner Monday morning since it was received late in the day Friday. Processing took about an hour.