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10 **UNITED STATES DISTRICT COURT**  
11 **SOUTHERN DISTRICT OF CALIFORNIA**  
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13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.  
16

17 GIOVANNI VINCENZO TILOTTA (3),  
18 aka "Gio Tilotta,"

19 Defendant.  
20

Case No.: 19-CR-4768-GPC

**STIPULATIONS**

21 IT IS HEREBY STIPULATED and agreed, by and through the Plaintiff,  
22 UNITED STATES OF AMERICA, though its counsel, REBECCA G. CHURCH,  
23 Attorney for the United States Acting Under Authority Conferred by 28 U.S.C. § 515,  
24 and Nicholas W. Pilchak and Andrew R. Haden, Assistant U.S. Attorneys, and  
25 defendant, GIOVANNI VINCENZO TILOTTA, by and through his counsel, Jeremy  
26 Warren and Katie Jenkins, the following:  
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1           1. All of the firearms referenced during this trial were operable firearms  
2 within the meaning of federal law.

3           2. At all times during the events of this case, Defendant Giovanni Vincenzo  
4 Tilotta had a federal firearms license, doing business as Honey Badger Firearms.  
5 Mr. Tilotta was also a California licensed firearms dealer during the same period.

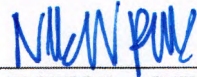
6           3. At no time during the events of this case did Morad Marco Garmo have a  
7 federal firearms license.

8           4. The text messages and voice messages introduced during this trial, other  
9 than text messages to or from witnesses Sean Becker or Joseph Nazareno, are authentic  
10 copies of text messages and voice messages obtained via forensic download from digital  
11 devices obtained from Morad Marco Garmo, Wael Yousif Anton, or Fred Magana,  
12 specifically including (1) a Samsung Galaxy S7 cellular telephone with IMEI  
13 358518070316434 seized from Garmo's residence on February 13, 2019; (2) a Samsung  
14 Galaxy S9+ cellular telephone with serial number R38K70EA29H seized from Garmo  
15 on February 13, 2019; (3) an Apple iPhone 6s with serial number FVMW808AHFLR  
16 seized from Anton's residence on February 13, 2019; and (4) an Apple iPhone with  
17 serial number F2MVNADAJCM2 used by Magana.

18           5. The email messages introduced during this trial and bearing control  
19 numbers applied by the United States are authentic copies of email messages that were  
20 exchanged between the senders and recipients listed on the messages' to, from, cc and  
21 bcc lines at the dates and times indicated.

1 SO STIPULATED AND AGREED.


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4 DATED: Aug. 25, 2022

  
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NICHOLAS W. PILCHAK  
ANDREW R. HADEN  
Assistant United States Attorneys

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8 DATED: 8/25, 2022

  
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GIOVANNI VINCENZO TILOTTA  
Defendant

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12 DATED: 8/25, 2022

  
\_\_\_\_\_  
JEREMY WARREN  
Counsel for Defendant TILOTTA