

MINUTES OF THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

FILED

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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY Jury Trial 7 DEPUTY

USA

VS

Giovanni Vincenzo

Case Number: 19-cr-4768-GPC-3

EXHIBIT LIST

☒ Plaintiff ☐ Defendant ☐ Court

No.	Description	Date LD.	Date Rec'vd	Witness
1	July 25, 2016 Email from Garmo to Khoury re total price for 2 Colts (BF-JK-073-000074)	8/31/2022	8/31/2022	Khoury
2	Oct. 6 + 16, 2016 Transfer Documents Including Form 4473 for Colt 1911 (s/n 2931866) from Garmo to Khoury (BF-REPORTS-003248 & 3254)	8/31/2022	8/31/2022	Khoury
3	Oct. 6 + 16, 2016 Transfer Documents Including Form 4473 for Colt 1911 (s/n NN03641) from Garmo to Khoury (BF-REPORTS-003263 & 3269)	8/31/2022	8/31/2022	Khoury
4	Sept. 21, 2016 Text Exchange Between Khoury and Garmo re "cal doj inv" (BF-RPTS-ATF805-020)	8/31/2022	8/31/2022	Khoury
5	Dec. 10, 2017 email from Garmo to Khoury re Khoury's CCW (BF-JK-073-000016)	-	-	-
6	Jan. 24, 2018 Text Exchange Between Garmo and Khoury re DGM pickup/G19 mags (BF-RPTS-ATF805-011)	-	-	-
7	Photo of Colt 1911 (s/n 2931866) and Colt 1911 (s/n NN03641) (BF-REPORTS-004973)	8/31/2022	8/31/2022	Khoury
8	Nov. 7, 2017 Email from Khoury to Garmo re Gore Fundraiser hosted by Hamel (BF-SW-5576-003179)	8/31/2022	8/31/2022	Khoury
8A	Nov. 7, 2017 Email from Marco G. to Anton, et al., re "Fundraiser-Gore" with attached invitation	8/31/2022	8/31/2022	Khoury
9	July 4, 2016 Email from Garmo to Khoury re 2 Colts from HBF (BF-JK-073-000070)	8/31/2022	8/31/2022	Khoury
10	Feb. 1, 2018 Text exchange between Garmo and Khoury re CCW application (BF-RPTS-ATF805-009)	-	-	-
11	Sample blank form 4473 (BF-REPORTS-0004869)	8/31/2022	8/31/2022	Handwerger
11A	Excerpt from form 4473 re question 11.a.	-	-	-
12	Sample blank DROS form (BF-REPORTS-0004875)	8/31/2022	8/31/2022	Chimileski
13	Federal Firearms Regulations Reference Guide (2005 ed.) (BF-REPORTS-003910)	8/31/2022	Demonstrative	Chimileski
14	Armslist screen capture "3 Revolvers for Sale, Package deal" (BF-REPORTS-000177)	8/31/2022	8/31/2022	Nazareno
15	Armslist screen capture "For sale: 3 Off Roster 9mm" (BF-REPORTS-000201)	8/31/2022	8/31/2022	Nazareno
16	Photo of all firearms purchased by Nazareno from Garmo (BF-REPORTS-004889)	8/31/2022	8/31/2022	Nazareno
17	Recording of Jan. 7, 2019 Meeting with Garmo (BF-AUDIO-0000011) (CD)	-	-	-
17A	Transcript of Clip 1 from Jan. 7, 2019 Meeting with Garmo (BF-AUDIO-000011-001)	-	-	-
17B	Transcript of Clip 2 from Jan. 7, 2019 Meeting with Garmo (BF-AUDIO-000011-002 006)	-	-	-
17C	Audio Clips of Recording of Jan. 7, 2019 Meeting with Garmo (CD)	-	-	-

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USA VS Giovanni Vincenzo Tilotta (3)

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No.	Description	Date I.D.	Date Rec'vd	Witness
18	Jan. 3, 2019 Text exchange between Garmo and Nazareno ("I need the money") (BF-REPORTS-000199)	8/31/2022	8/31/2022	Nazareno
19	Jan. 31, 2019 Text exchange between Garmo and Nazareno ("Russian made AK style rifle") (BF-REPORTS-000261)	8/31/2022	8/31/2022	Nazareno
20	Jan. 7, 2019 Text exchange between Garmo and Nazareno re gun sale at Discount Gun Mart (BF-REPORTS-000226)	-	-	-
21	Screen captures of Garmo's Armslist ad for x2 Beretta APX handguns (BF-AUDIO-000009 002 & 003)	8/31/2022	8/31/2022	Becker
22	Text messages with Garmo re x2 Beretta APX handguns (Jan. 3 to Jan. 4, 2019) (BF-AUDIO-000009 0001)	8/31/2022	8/31/2022	Becker
23	Photo of x2 Beretta APX handguns (s/n A001236X and A053204X) (BF-REPORTS-004882)	8/31/2022	8/31/2022	Becker
24	Text messages between Garmo and UCA "Sean" re Beretta APXs, Jan. 14, 2019 (BF-REPORTS-000233)	-	-	-
25	Audio recording of Jan. 22, 2019 call with Garmo (8:34 p.m.) (BF-AUDIO-000016) (CD)	-	-	-
25A	Clip 1 transcript of audio recording of Jan. 22, 2019 call with Garmo (8:34 p.m.) (BF-AUDIO-000016-002)	-	-	-
25B	Clip 2 transcript of audio recording of Jan. 22, 2019 call with Garmo (8:34 p.m.) (BF-AUDIO-000016-005)	-	-	-
25C	Audio Clips of recording of Jan. 22, 2019 call with Garmo (CD)	-	-	-
26	Photo of Garmo search, dresser drawer with handguns and Sheriff's badge (BF-SW-0558-000184)	-	-	-
27	Photo of undated loan letter between Garmo and Hamel (BF-SW-0558-000193)	-	-	-
28	Photo of interior of firearms safe door (BF-SW-0558-000218)	8/31/2022	8/31/2022	Becker
29	Photo of firearms safe with flat door (BF-SW-0558-000317)	-	-	-
30	Photo of Samsung S7 and AT&T flip phone (BF-SW-0558-000325)	-	-	-
31	Samsung S7 IMEI 358518070316434 (item #85) (PHYSICAL)	8/31/2022	8/31/2022	Becker
32	Photo of all firearms seized from Garmo residence (BF-REPORTS-004879)	8/31/2022	8/31/2022	Becker
33	Audio Clip of Jan. 4, 2019 meet with Garmo (BF-AUDIO-000009) (CD)	8/31/2022	-	Becker
33A	Transcript Clip of audio recording of Jan. 4, 2019 meet with Garmo (BF-TRANSCRIPT-000632)	8/31/2022	-	Becker
34	Oct. 19, 2016 Text exchange between Garmo and Bajaj (re "btw 28th my station for guns") (BF-RPTS-ATF805-035)	9/1/2022	9/1/2022	Bajaj
35	Oct. 28, 2016 Text exchange between Garmo and Bajaj (re "Just finishing up") (BF-RPTS-ATF805-037)	9/1/2022	9/1/2022	Bajaj

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Jury Trial

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36	Oct. 6, 2016 Text exchange between Garmo and Tilotta (re "I have all your paperwork) (BF-RPTS-ATF805-039)	-	-	-
37	Oct. 6, 2016 Text exchange between Garmo and Bajaj (re "Vic i need your CDL, place of birth") (BF-RPTS-ATF805-040)	9/1/2022	9/1/2022	Bajaj
38	Oct. 6, 2016 Text exchange between Garmo and Tilotta (re "I will need a copy of his actual license") (BF-RPTS-ATF805-041)	-	-	-
39	Oct. 6, 2016 Text exchange between Garmo and Bajaj (re "Vic can you text me pic") (BF-RPTS-ATF805-042)	9/1/2022	9/1/2022	Bajaj
40	Oct. 6, 2016 Text exchange between Garmo and Tilotta (re "Haha thanks about to make me loose my mind [sic]") (BF-RPTS-ATF805-044)	-	-	-
41	Oct. 29, 2016 Text exchange between Garmo and Bajaj (re "I'm with the family but") (BF-RPTS-ATF805-046)	9/1/2022	9/1/2022	Bajaj
42	Nov. 3, 2016 Text exchange between Garmo and Bajaj (re "Legion!" / "Yella") (BF-RPTS-ATF805-052)	-	-	-
43	Apr. 25, 2017 Text exchange between Garmo and Bajaj (re "Good morning Captain") (BF-RPTS-ATF805-058)	-	-	-
44	Vikas Bajaj CCW (BF-SDSD-049-00952)	-	-	-
45	Honey Badger Firearms Invoice dated Dec. 21, 2016 re Daniel Defense DDM4 V11 etc. sold to Vikas Bajaj (BF-GJX-000244)	9/1/2022	9/1/2022	Bajaj
46	Oct. 8 + 28, 2016 Transfer Documents Including Form 4473 for Bajaj's acquisition of a Daniel Defense DDM4V11 (s/n DDM4107377) and a Smith & Wesson Shield (s/n HNH6175) (BF-ATF-000001)	9/1/2022	9/1/2022	Bajaj
47	Oct. 29 + Nov. 27, 2016 Transfer Documents Including Form 4473 for Bajaj's acquisition of a Glock 27 (s/n RLK240) (BF-ATF-000014)	9/1/2022	9/1/2022	Bajaj
48	Oct. 23, 2017 Email from Garmo to Bajaj re "Fwd: Hamel invite" (BF-VB-076-000031)	9/1/2022	9/1/2022	Bajaj
49	Oct. 28, 2016 Check from Bajaj to Garmo for \$1,200 (BF-WFB-002-000322)	9/1/2022	9/1/2022	Bajaj
50	Photo of Daniel Defense, S&W M&P Shield, Glock 27 (BF-REPORTS-004984)	9/1/2022	9/1/2022	Bajaj
51	Apr. 26, 2017 Text exchange between Garmo and Bajaj re "Thank you for everything yesterday" (BF-RPTS-ATF805-063)	-	-	-
52	Oct. 5, 2016 Text exchange between Garmo and Bajaj re "Vic whats your budget for AR?" (BF-RPTS-ATF805-088)	9/1/2022	9/1/2022	Bajaj
53	Oct. 15, 2016 Texts between Garmo and Bajaj (re "buttery and sweet") (BF-RPTS-ATF805-031)	9/1/2022	9/1/2022	Bajaj
54	Oct. 7, 2016 Texts between Garmo and Bajaj (re "bring a S&W Shield") (BF-RPTS-ATF805-032)	9/1/2022	9/1/2022	Bajaj
55	Dec. 2, 2015 Firearm Dealer Compliance Inspection Worksheet (BF-REPORTS-004171)	-	-	-
56	Dec. 2, 2015 Firearms Dealer Notification of Inspection Findings (BF-REPORTS-004173)	9/6/2022	9/6/2022	Lewis
57	Dec. 6, 2012 Honey Badger Firearms Application for Centralized List of Firearms Dealers (BF-REPORTS-004183)	-	-	-

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58	Mar. 20, 2017 Text exchange between Garmo and Diaz at 9:25 a.m. "Jr. Hey bro can you order a Walther PPQ m2 and a Glock 42" (BF-RPTS-ATF805-083)	9/6/2022	9/6/2022	Beals
59	Apr. 7, 2017 Text exchange between Garmo and Diaz at 11:23 a.m. "Jr update for Fred" (BF-RPTS-ATF805-006)	9/1/2022	9/1/2022	Diaz
60	Feb. 7, 2018 Text exchange between Diaz and Garmo re Canik, Ruger and Sig handguns (BF-RPTS-ATF805-007)	9/1/2022	9/1/2022	Diaz
61	Honey Badger Website "Purchasing firearms" in California page (BF-WEB-HBF-000021)	9/1/2022	9/1/2022	Diaz
62	California DOJ, Bureau of Firearms Log for DROS Entry System Calls from Honey Badger Firearms (BF-REPORTS-004192)	-	-	-
63	Photo of Walther PPQ (s/n FCH4067) (BF-REPORTS-004717)	9/1/2022	9/1/2022	Magana
64	Photo of Walther PPS (s/n AR5980) (BF-REPORTS-004696)	9/1/2022	9/1/2022	Magana
65	Apr. 24 + May 16, 2017 Transfer Documents Including Form 4473 for Magana's acquisition of a Walther PPQ (s/n FCH4067) and a Walther PPS (s/N AR5980) from Honey Badger Firearms (BF-REPORTS-003200)	9/1/2022	9/1/2022	Diaz
66	Sept. 15 + Oct. 5, 2017 Transfer Documents Including Form 4473 for Hamel's acquisition of a Walther PPQ (s/n FCH4067) and a Walther PPS (s/N AR5980) from Magana (BF-REPORTS-002868)	9/1/2022	9/1/2022	Magana
67	Feb. 13, 2018 Text exchange between Magana and Diaz re firearms (BF-REPORTS-003637-029)	-	-	-
68	Mar. 23, 2017 Text exchange between Magana and Garmo re "Paid 4 ur guns" (BF-REPORTS-003637-027)	9/1/2022	9/1/2022	Magana
69	Sept. 6, 2018 Text exchange between Garmo and Magana re "bros are forever" (BF-REPORTS-003637-001)	9/1/2022	9/1/2022	Magana
70	Dec. 17, 2018 Text exchange between Garmo and Magana re "Gman marketing inc." (BF-RPTS-ATF806-002)	-	-	-
71	Photo of Garmo, Anton and Magana with red campaign sign (BF-RPTS-ATF805-078)	-	-	-
72	Photo of Magana, Sheriff Gore and Garmo in uniform (BF-RPTS-ATF805-079)	8/31/2022	8/31/2022	Khoury
73	Photo of Tilotta, Magana, Garmo and Hamel at event with San Diego County Gun Owners sign (BF-RPTS-ATF805-000080)	9/1/2022	9/1/2022	Magana
74	Mar. 16, 2018 Text exchange between Garmo and Llanes re Front Sight (BF-RPTS-ATF805-023)	-	-	-
75	May 16, 2018 Text exchange between Garmo and JR Diaz re Starting DROS Forms (BF-RPTS-ATF805-025)	-	-	-
76	May 31, 2018 to June 14, 2018 Text exchange between Garmo and Llanes re Honey Badger Pickup (BF-RPTS-ATF805-026)	9/2/2022	9/2/2022	Llanes
77	May 31 + June 14, 2018 Transfer Documents Including Form 4473 for Llanes' acquisition of a Smith & Wesson .38 special revolver (s/n CFA6846) from Honey Badger Firearms (BF-REPORTS-002995)	9/2/2022	9/2/2022	Llanes
78	Dec. 5, 2014 Email from Garmo to Llanes et al. re "****FOR SALE****" (BF-DL-047-000007)	9/2/2022	9/2/2022	Llanes

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79	July 13, 2016 Text exchange between Garmo and Llanes re firearms for sale (BF-RPTS-ATF805-084)	-	-	-
80	Acknowledgement of Federal Firearms Regulations from Aug. 3, 2012 inspection (BF-REPORTS-004155-004156)	9/2/2022	9/2/2022	Sison
81	Application for Federal Firearms License, dated April 25, 2012 (BF-REPORTS-003783)	-	-	-
82	Aug. 8, 2012 Firearms Qualification Report (BF-ATF-000240)	9/2/2022	-	Sison
83	Dec. 28, 2016 Application for Amended FFL (BF-REPORTS-003808)	9/6/2022	9/6/2022	Beals
84	Mar. 3, 2018 Email from Handwerger to Garmo re "Look at this" [Sig P365] (BF-BH-059-000060)	8/31/2022	8/31/2022	Handwerger
85	Mar. 19, 2018 Email from Garmo to Handwerger re "****STUFF***" [Sig P365] (BF-SW-5576-003263)	-	-	-
86	Nov. 24, 2017 Email from Garmo to Handwerger re "Sermorelin" [Front Sight] (BF-BH-059-000030)	-	-	-
87	Nov. 19, 2017 Email from Garmo to Handwerger re "CCW Application Just Cause Letter - Bronner Handwerger" (BF-SW-5576-003396)	-	-	-
88	Dec. 22, 2017 to Oct. 23, 2018 Text exchange between Garmo and Handwerger (BF-RPTS-ATF805-066)	8/31/2022	8/31/2022	Handwerger
89	Mar. 23, 2017 Email from Hamel to Garmo: "Marco, do u know who is running against Summer?" (BF-SW-5576-003123)	9/6/2022	9/6/2022	Hamel
90	Mar. 23, 2017 Email from Hamel to Garmo re putting a Ruger on Gio's books, intending to do a transfer (BF-RPTS-841-000335)	9/6/2022	9/6/2022	Hamel
91	June 27, 2016 Email from Hamel to Garmo: "Gio asks that we do ordered guns this way." (BF-RPTS-841-000258)	9/2/2022	9/2/2022	Hamel
92	Mar. 16, 2018 Email about loan letters ("I'll stop by Saturday...") (BF-RPTS-841-000517)	9/6/2022	9/6/2022	Hamel
93	Apr. 7, 2017 Text exchange between Hamel and Garmo re Walthers (10:51 to 11:23 a.m.) (BF-RPTS-ATF805-003)	9/6/2022	9/6/2022	Hamel
94	Oct. 14, 2017 Email from Garmo to Hamel re Front Sight ("Not exactly free. Next time you accidentally buy an off-roster handgun that you don't like...") (BF-RPTS-841-000418)	9/6/2022	9/6/2022	Hamel
95	Oct. 9, 2018 Email from Hamel to Garmo (re Dillon thoughts on home FFLs) (BF-SW-5576-001756)	-	-	-
96	Jan. 24, 2018 Email ("Can u give me the serial numbers of the Legion and the Canik? Did we leave them at gios?") (BF-RPTS-841-000499)	9/6/2022	9/6/2022	Hamel
97	Jan. 3, 2018 Email from Hamel to Garmo "I'll send a check to your c card." (BF-RPTS-841-000491)	-	-	-
98	Mar. 2, 2016 Email from Hamel to Garmo re CCW applicants / "good thumbs up" (BF-RPTS-841-000223)	-	-	-
99	Dec. 20, 2015 Email from Hamel to Garmo "Re: Sam is running for Dave Roberts seat" (BF-RPTS-841-000176)	9/2/2022	9/2/2022	Hamel
100	Dec. 24, 2015 Email from Hamel to Schwartz "Re: Do u have Gios email, numbers and address from Honey Badger?" (BF-RPTS-841-000654)	9/2/2022	9/2/2022	Hamel

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No.	Description	Date L.D.	Date Rec'vd	Witness
101	Jan. 4, 2016 Email from Hamel to Honey Badger Firearms "Re: Hello Gio" (BF-RPTS-841-000658)	9/2/2022	9/2/2022	Hamel
102	Mar. 16, 2016 Email from Hamel to hbfirearms@gmail.com "Re: Hello Gio, Are private party HANDGUN transfers" (BF-RPTS-841-000669)	9/2/2022	9/2/2022	Hamel
103	Aug. 25, 2017 Email from Hamel to Garmo "Re: Hello again, bad news for Oct." (BF-RPTS-841-000406)	-	-	-
104	Aug. 24, 2014 Email from Hamel to Garmo "Re: BG" (BF-RPTS-841-000108)	9/2/2022	9/2/2022	Hamel
105	Sept. 28, 2015 Email from Hamel to Garmo "Re: I'd like to have a serious talk" (BF-RPTS-841-000137)	-	-	-
106	Feb. 22, 2014 Email from Garmo to Hamel "Re: Media Relations Notice" (BF-RPTS-841-000772)	9/2/2022	9/2/2022	Hamel
107	Feb. 25, 2014 Email from Garmo to Hamel "Re: Friday" (BF-RPTS-841-000077)	9/2/2022	9/2/2022	Hamel
108	Feb. 25, 2014 Email from Garmo to Hamel "Re: Friday" (BF-RPTS-841-000079)	9/2/2022	9/2/2022	Hamel
109	Mar. 18, 2014 Email from Garmo to Hamel "Re: Glock 19 Gen 4" (BF-RPTS-841-000081)	-	-	-
110	Oct. 19, 2015 Email from Garmo to Hamel "Re: Did we transfer the" (BF-RPTS-841-000147)	-	-	-
111	Oct. 22, 2015 Email from Hamel to Garmo "Re: Did we fill 10th seat at hdsa dinner?" (BF-RPTS-841-000153)	9/2/2022	9/2/2022	Hamel
112	Oct. 25, 2015 Email from Hamel to Garmo "Re: Update" (BF-RPTS-841-000154)	9/2/2022	9/2/2022	Hamel
113	Feb. 4, 2016 Email from Hamel to Garmo "Re: When would be a convenient time for us to go to Gios?" (BF-RPTS-841-000194)	9/2/2022	9/2/2022	Hamel
114	Feb. 23, 2016 Email from Hamel to Garmo "Next week I only have Tue and Thursday for lunch" (BF-RPTS-841-000214)	9/6/2022	9/6/2022	Hamel
115	Feb. 23, 2016 Email from Hamel to Garmo "Re: FOR SALE.docx" (BF-RPTS-841-000211)	-	-	-
116	May 27, 2016 Email from Hamel to Tilotta "Just checking, did marco make it by?" (BF-RPTS-841-000678)	9/2/2022	9/2/2022	Hamel
117	May 31, 2016 Email from Hamel to Garmo "I am meeting tim curran for lunch on Thursday" (BF-RPTS-841-000243)	9/2/2022	9/2/2022	Hamel
118	June 5, 2016 Email from Hamel to Tilotta "When will the Guthrie guns be ok to pick up?" (BF-RPTS-841-000679)	-	-	-
119	June 9, 2016 Email from Hamel to Tilotta "Re: When will the Guthrie guns be ok to pick up?" (BF-RPTS-841-000246)	9/2/2022	9/2/2022	Hamel
120	June 26, 2016 Email from Hamel to Garmo "I'll get the Ruger back to you and you can take it to Gio" (BF-RPTS-841-000683)	9/2/2022	9/2/2022	Hamel
121	June 27, 2016 Email from Hamel to Garmo "Re: Gio asks that we do ordered guns" (BF-RPTS-841-000263)	9/2/2022	9/2/2022	Hamel
122	June 28, 2016 Email from Hamel to Garmo "Do u know when you will see Gio?" (BF-RPTS-841-000693)	9/2/2022	9/2/2022	Hamel

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123	June 28, 2016 Email from Hamel to Maggie "Maggie, There is a small revolver in your safe" (BF-RPTS-841-000694)	-	-	-
124	June 29, 2016 Email from Hamel to sales@honeybadgerfirearms.com "Re: the Ruger that was dropped off by Maggie today belongs to Marco" (BF-RPTS-841-000268)	-	-	-
125	July 5, 2016 Email from Hamel to Garmo "Re: You saw Gio last week, yes?" (BF-RPTS-841-000703)	9/2/2022	9/2/2022	Hamel
126	July 6, 2016 Email from Hamel to Tilotta "Remind me" (BF-RPTS-841-000704)	9/2/2022	9/2/2022	Hamel
127	Mar. 20, 2017 Text exchange between Garmo and Hamel re "fred is such a good friend" (BF-RPTS-ATF805-081)	-	-	-
128	Nov. 2, 2017 Email from Hamel to Garmo "Re: stuff" (BF-RPTS-841-000462)	9/2/2022	9/2/2022	Hamel
129	Nov. 4, 2017 Email from Garmo to Hamel "Re: Do u have to wait 10 days on PPQ?" (BF-RPTS-841-000464)	9/2/2022	9/2/2022	Hamel
130	Nov. 4, 2017 Email from Hamel to self "Stop by Marco and pay him for items yo" (BF-RPTS-841-000465)	-	-	-
131	Nov. 4, 2017 Email from Hamel to self "Take marco his money" (BF-RPTS-841-000468)	-	-	-
132	Nov. 29, 2017 Email from Garmo to Hamel "Re: I now have the bug for a regular size, not compact, Walther P99 in 9mm." (BF-RPTS-841-000474)	9/2/2022	9/2/2022	Hamel
133	Oct. 24, 2017 Email from Hamel to Garmo "Re: Dani, Thank you. Did I register any private classes in Mar. of Apr.? ..." (BF-RPTS-841-000438)	9/2/2022	9/2/2022	Hamel
134	Undated handwritten loan letter listing four firearms: Sig Sauer Legion P226, Ruger LCR, Canik TP9SF Elite, and Canik TP9SFX Elite (BF-REPORTS-001140)	9/6/2022	9/6/2022	Hamel
135	Feb. 1, 2015 Email from Hamel to Garmo "Re: A reminder, next Sunday we are meeting in Rancho santa fe to see that gun" (BF-RPTS-841-000127)	-	-	-
136	Nov. 5, 2015 Email from Garmo to Hamel "UPDATE" (BF-RPTS-841-000159)	-	-	-
137	Oct. 30, 2017 Email from Garmo to matador6262@gmail.com, Hamel "Re: Thank you for your online contribution!" (BF-RPTS-841-000833)	-	-	-
138	Dec. 31, 2017 Email from Hamel to Garmo "Re: __ New Springfield M1A" (BF-RPTS-841-000487)	9/2/2022	9/2/2022	Hamel
139	Jan. 3, 2018 Email from Hamel to Garmo "Re: Dont forget to order one of those PPQ 5inch w ported barrel" (BF-RPTS-841-000491)	-	-	-
140	Jan. 8, 2018 Email from Garmo to hbfirearms@gmail.com "UPDATE" (BF-RPTS-841-000493)	-	-	-
141	Jan. 24, 2018 Email from Garmo to Hamel "Re: Can u give me the serial numbers" (BF-RPTS-841-000501)	-	-	-
142	Mar. 16, 2018 Email from Hamel to Garmo "Re: Can I just keep the Canik?" (BF-RPTS-841-000514)	-	-	-
143	Mar. 16, 2018 Email from Hamel to Garmo "Re: I'll stop by Saturday and drop off the money and pick up the guns." (BF-RPTS-841-000518)	-	-	-

MINUTES OF THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

USA

VS

Giovanni Vincenzo Tilotta (3)

Case Number: 19-cr-4768-GPC-3

EXHIBIT LIST

Jury Trial

☒ Plaintiff ☐ Defendant ☐ Court

No.	Description	Date LD.	Date Rec'vd	Witness
144	Undated typed loan letter for Sig Saur [sic] P320 Pistol, serial number 58B023687, with copy of Garmo's business card (BF-HAMEL-000124)	-	-	-
145	Undated typed loan letter for four firearms: Ruger LCR 5-Shot 9mm Revolver, Serial # 545-34978 through Canik TP9SFX 9mm Pistol, Serial # 17BC01712 (BF-HAMEL-000125)	-	-	-
146	Undated handwritten loan letter for Sig Legion Serial # A7A141276 (BF-HAMEL-000126)	-	-	-
147	Aug. 21, 2017 Email from Hamel to Hollan Garmo "Re: Do u have any plans for Marcos BD? I'd be happy to help." (BF-RPTS-841-000403)	-	-	-
148	Aug. 25, 2017 Email from Hamel to Garmo "Re: Hello again, bad news for Oct." (BF-RPTS-841-000406)	-	-	-
149	Oct. 8, 2017 Email from Hamel to Hollan Garmo "Re: Sorry I never got back to u on Marcos present." (BF-RPTS-841-000415)	-	-	-
150	Apr. 22, 2017 Email from Hamel to Garmo "Re: Walther" (BF-RPTS-841-000353)	9/6/2022	9/6/2022	Hamel
151	Apr. 24, 2017 Email from Garmo to Hamel "RE: when you get to Gios please have him call my cell." (BF-RPTS-841-000738)	9/6/2022	9/6/2022	Hamel
152	Apr. 25, 2017 Email from Hamel to Hamel "Gio re payment" (BF-RPTS-841-000741)	-	-	-
153	Aug. 23, 2017 Email from Hamel to Garmo "Fred Mangana [sic] has a couple handguns to sell, private party, can u remind him and have him email me?" (BF-RPTS-841-000404)	9/6/2022	9/6/2022	Hamel
154	Apr. 12, 2017 Email from Garmo to Hamel "Re: Law Enforcement Advisory from ATF" (BF-SW-5576-001754)	9/6/2022	9/6/2022	Hamel
155	Apr. 12, 2017 Email from Garmo to Hamel "FW: Law Enforcement Advisory from ATF" (BF-RPTS-841-000041)	-	-	-
156	Mar. 31, 2017 ATF memorandum (BF-RPTS-841-000042)	9/6/2022	9/6/2022	Hamel
157	Sept. 22, 2016 Email from Hamel to Garmo "You had mentioned once taking a few days and going to front sight for your birthday." (BF-RPTS-841-000304)	-	-	-
158	Sept. 22, 2016 Email from Hamel to Garmo "Front sight fees are covered as well." (BF-RPTS-841-000305)	-	-	-
159	Apr. 16, 2017 Email from Hamel to Garmo "Re: You have this membership now. Happy Birthday!" (BF-RPTS-841-000352)	9/6/2022	9/6/2022	Hamel
160	Dec. 19, 2017 Email from Hamel to Magana "Re: Be,ow [sic] is question Isent to the fifth member of our group on Mar., Doc Bronn." (BF-RPTS-841-000615)	-	-	-
161	Oct. 14, 2017 Email from Garmo to Hamel "Re: Front sight can accommodate us anytime in Mar. except the below datse" (BF-RPTS-841-000418)	-	-	-
162	May 17, 2018 Email from Hamel to Tilotta "Frint [sic] sight invite." (BF-RPTS-841-000764)	9/6/2022	9/6/2022	Hamel
163	May 28, 2018 Email from Hamel to Hamel "Lawyer re course(s). Anklet, sleep doc, receipt Gio, owe Gio \$4000, receipt jeff" (BF-RPTS-841-000765)	-	-	-
164	June 29, 2018 Email from Hamel to Hamel re "Call Gio re non serial numbered AR and AR handguns" (BF-RPTS-841-000766)	-	-	-

MINUTES OF THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

USA

VS

Giovanni Vincenzo Tilotta (3)

Case Number: 19-cr-4768-GPC-3

EXHIBIT LIST

Jury Trial

☒ Plaintiff ☐ Defendant ☐ Court

No.	Description	Date L.D.	Date Rec'vd	Witness
165	July 14, 2018 Email from Hamel to Tilotta "PPQ sc can u see if you can get?" (BF-RPTS-841-000767)	9/2/2022	9/2/2022	Hamel
166	Sept. 3, 2017 Email from Hamel to hbfirearms@gmail.com "Fred Magana, who has become a freind [sic] of mine, wants Legion." (BF-RPTS-841-000750)	-	-	-
167	Sept. 11, 2017 Email from Honey Badger Firearms to Hamel "Re: Hello, Fred just got back to me on the Legion 229." (BF-RPTS-841-000753)	-	-	-
168	Jan. 8, 2018 Email from Hamel to Magana, Garmo & Llanes "Re: RE: ***UPDATE***" (BF-RPTS-841-000492)	-	-	-
169	July 9, 2015 Email from Hamel to logan@leohamel.com & Garmo "Re: ***UPDATE***" (BF-RPTS-841-000128)	-	-	-
170	Feb. 21, 2016 Email from Hamel to Honey Badger Firearms "Re: Gio can I but [sic] some sig mags, 15 round, from your ffl to mine?" (BF-RPTS-841-000665)	9/2/2022	9/2/2022	Hamel
171	Dec. 10, 2015 Email from Garmo to Hamel "Re: UPDATE" (BF-RPTS-841-000173)	9/6/2022	9/6/2022	Hamel
172	Photo of Glock 19 Gen4 9mm handgun with serial number WNU930 (BF-REPORTS-004729)	9/2/2022	9/2/2022	Hamel
173	Photo of Sig Sauer P320 9mm handgun s/n 58B017746 (BF-REPORTS-004723)	-	-	-
174	Photo of Sig Sauer P320 Compact 9mm handgun s/n 58B024632 (BF-REPORTS-004732)	9/2/2022	9/2/2022	Hamel
175	Photo of Sig Sauer P226 Legion 9mm handgun s/n 47A141276 (BF-REPORTS-004708)	9/2/2022	9/2/2022	Hamel
176	Photo of Walther PPQ M1 9mm handgun s/n FCL8076 (BF-REPORTS-004720)	9/2/2022	9/2/2022	Hamel
177	Photo of Glock 23 Gen4 .40 caliber handgun s/n VWA350 (BF-REPORTS-004681)	-	-	-
178	Photo of Glock 21 Gen4 .45 caliber handgun s/n VYF569 (BF-REPORTS-004690)	-	-	-
179	Photo of Sig Sauer P320 Compact 9mm handgun s/n 58B023687 (BF-REPORTS-004705)	-	-	-
180	Photo of Ruger LCR 5456 9mm handgun s/n 54534973 (BF-REPORTS-004699)	-	-	-
181	Photo of Century Arms Canik TP9 9mm handgun s/n 16BH01243 (BF-REPORTS-004693)	-	-	-
182	Photo of Canik TP9 SFX 9mm handgun s/n 17BC01712 (BF-REPORTS-004726)	-	-	-
183	Leo Hamel Fine Jewelers Firearms Acquisition and Disposition Record (BF-REPORTS-002130-2148)	9/6/2022	9/6/2022	Beals
184	July 15, 2018 Email from Hamel to Garmo re PPQ talk with MMG (BF-RPTS-841-000566)	9/2/2022	9/2/2022	Hamel
185	Jan. 3, 2017 Email from Hamel to Garmo re Good to transfer it's January (BF-RPTS-841-000316)	9/6/2022	9/6/2022	Hamel
187	Photo of pile of boxed ammunition on Leo Hamel Fine Jewelers loading dock (BF-SW-0563-000028)	-	-	-

MINUTES OF THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

USA VS Giovanni Vincenzo Tilotta (3)

Case Number: 19-cr-4768-GPC-3 EXHIBIT LIST Jury Trial

☒ Plaintiff ☐ Defendant ☐ Court

No.	Description	Date I.D.	Date Rec'vd	Witness
188	Photo of boxed ammunition in U-Haul truck (BF-REPORTS-004866)	-	-	-
189	Photo of boxed ammunition on top of jeweler's safes at Leo Hamel Fine Jewelers (BF-SW-0563-000054)	-	-	-
190	Jan. 8, 2018 Email from Garmo to hbfirearms@gmail.com bcc leohamel@aol.com re "UPDATE" ("order me (2) Sig P365s") (BF-SDCSD-012716)	9/6/2022	9/6/2022	Beals
191	Oct. 3, 2018 Email from Garmo to Honey Badger Firearms "Re: UPDATE" ("not a Glock fan") (BF-SW-5576-004307)	-	-	-
192	Oct. 9, 2018 Email from Tilotta to Garmo, offering first dibs on Sig P365s (BF-SW-5576-004243)	9/6/2022	9/6/2022	Beals
193	Oct. 28, 2016 Email from HBF to Garmo with Bajaj blank DROS for S&W Shield (BF-REPORTS-002954.52 & .53 & BF-REPORTS-002921)	9/6/2022	9/6/2022	Beals
194	July 4, 2016 Email from Garmo to Khoury ("FYI" re Colt 1911s) (BF-JK-073-000070)	-	-	-
195	May 31 + June 14, 2018 Transfer Documents Including Form 4473 for Garmo's acquisition of a Sig Sauer P365 at Honey Badger Firearms (s/n 66A047292) (BF-REPORTS-002524)	9/6/2022	9/6/2022	Beals
196	July 7 + 20, 2016 Transfer Documents Including Form 4473 for for Garmo's acquisition of Colt 1911 (s/n 2931866), Colt 1911 (s/n NN03641) and Sig Sauer P226 Legion (s/n 47A141276) from Honey Badger Firearms (BF-REPORTS-002286)	9/6/2022	9/6/2022	Beals
197	Oct. 21 & Nov. 16, 2015 Transfer Documents Including Form 4473 for Garmo's acquisition of a Sig Sauer P320 Compact (s/n 58B024632) from Honey Badger Firearms (for Hamel) (BF-REPORTS-002206)	9/6/2022	9/6/2022	Beals
198	Nov. 2 + 14, 2017 Transfer Documents Including Form 4473 for Garmo's acquisition of a Walther PPQ M1 (s/n FCL8076) from Honey Badger Firearms (for Hamel) (BF-REPORTS-002452)	-	-	-
199	Federal Firearms License for Honey Badger Firearms, signed by Tilotta and dated Sept. 15, 2015 (BF-REPORTS-002917)	-	-	-
200	Federal Firearms License for Honey Badger Firearms, signed by Tilotta and dated Dec. 18, 2017 (BF-REPORTS-002939)	-	-	-
201	License Registration Report for Giovanni Vincenzo Tilotta, doing business as Honey Badger Firearms (BF-REPORTS-007060)	-	-	-
201 A	Public Records Certificate for License Registration Report for Giovanni Vincenzo Tilotta, doing business as Honey Badger Firearms (BF-REPORTS-007058)	-	-	-
202	Federal Firearms License for Omni Equipment Solutions, Inc., signed by Tilotta and dated Nov. 1, 2018 (BF-REPORTS-002948)	-	-	-
203	Federal Firearms License for Omni Equipment Solutions, Inc. (BF-REPORTS-007063)	-	-	-
203 A	Public Records Certificate for Federal Firearms License for Omni Equipment Solutions, Inc. (BF-REPORTS-007061)	-	-	-
204	Photo of Exterior of Honey Badger Firearms (BF-REPORTS-007149)	9/1/2022	9/1/2022	Diaz

MINUTES OF THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

USA

VS

Giovanni Vincenzo Tilotta (3)

Case Number: 19-cr-4768-GPC-3

EXHIBIT LIST

Jury Trial

☒ Plaintiff ☐ Defendant ☐ Court

No.	Description	Date I.D.	Date Rec'vd	Witness
205	Summary Chart of Garmo Acquisitions – All FFLs (BF-REPORTS-005159)	9/6/2022	Demonstrative	Beals
206	Summary Chart of Garmo Acquisitions – Top 4 FFLs (BF-REPORTS-0005612)	9/6/2022	9/6/2022	Beals
207	“Willy n Gman” Photo (BF-RPTS-MAIN-002633)	-	-	-
208	Honey Badger Bound Book (A&D Log) ATF Item 706 [Garmo] (BF-REPORTS-002149)	-	-	-
209	Honey Badger Bound Book (A&D Log) ATF Item 707 [Garmo] (BF-REPORTS-002152)	9/6/2022	9/6/2022	Beals
210	Honey Badger Bound Book (A&D Log) ATF Item 708 [Anton] (BF-REPORTS-002156)	-	-	-
211	Honey Badger Firearms Acquisition & Disposition Record ATF Item 709 [Garmo] (BF-REPORTS-002158)	9/6/2022	9/6/2022	Beals
212	Honey Badger Firearms Acquisition & Disposition Record ATF Item 710 [Hamel] (BF-REPORTS-002168)	-	-	-
213	Mar. 20, 2017 Text exchange between Garmo, Hamel and Diaz re firearms (BF-RPTS-ATF805-083)	9/1/2022	9/1/2022	Diaz
214	Oct 9, 2018 Email from HBF to Garmo re Sig P365 (BF-SW-5576-004243)	-	-	-
215	Photo of firearms seized from Garmo and transferred from Garmo to others (BF-REPORTS-005006)	9/6/2022	9/6/2022	Beals
216	May 30 + June 11, 2018 Transfer Documents Including Form 4473 for Beretta APX 9mm handgun (s/n A000555X) and Century Arms RAS-47 7.62 mm rifle (s/n RAS47058200) from Garmo to Khoury (BF-REPORTS-002618)	-	-	-
217	March 19, 2018 Text exchange between Garmo and Tilotta re Will and 70k contract (BF-RPTS-ATF805-100)	-	-	-
218	Oct. 29, 2016 Text exchange between Garmo and Tilotta re “vic is going to be a very good customer for life” (BF-RPTS-ATF805-093)	-	-	-
219	July 20, 2016 Text exchange between Tilotta and Garmo re “Just printing up some forms” (BF-RPTS-ATF805-085)	-	-	-
220	April 29, 2018 Text exchange from Garmo to Magana, Hamel and Tilotta re “Always a good day when we hang out w the bros!” (BF-RPTS-ATF805-101)	-	-	-
221	June 7, 2018 Text exchange between Garmo and Tilotta re leather company (BF-RPTS-ATF805-102)	-	-	-
222	June 2, 2017 Text from Garmo to Tilotta re “always bringn u more customers bro” (BF-RPTS-ATF805-099)	9/6/2022	9/6/2022	Beals
223	March 22, 2017 Text exchange between Garmo and Tilotta re order for two Walthers (BF-RPTS-ATF805-098)	9/6/2022	9/6/2022	Beals
224	July 20, 2016 Text exchange between Garmo and Hamel re “I have the legion for you” (BF-RPTS-ATF805-087)	9/2/2022	9/2/2022	Hamel
225	Nov. 3, 2016 Text exchange between Garmo and Anton re “Love Gio! Hes our persibal gun dealer” (BF-RPTS-ATF805-096)	9/6/2022	9/6/2022	Beals
226	Oct. 4, 2016 Text exchange between Tilotta and Garmo re “Totally forgot what am I doing with this 45 shield?” (BF-RPTS-ATF805-107)	9/6/2022	9/6/2022	Beals

MINUTES OF THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

USA

VS

Giovanni Vincenzo Tilotta (3)

Case Number: 19-cr-4768-GPC-3

EXHIBIT LIST

Jury Trial

☒ Plaintiff ☐ Defendant ☐ Court

No.	Description	Date I.D.	Date Rec'd	Witness
227	Oct. 5 through 16, 2016 Text exchange between Garmo and Tilotta re "rich atty buddy's" AR (BF-RPTS-ATF805-001)	-	-	-
228	Anton Apple iPhone 6s SN FVMW808AHFLR (item #44) (PHYSICAL)	-	-	-
229	Photo of Anton grey Apple iPhone 6s SN FVMW808AHFLR on bedroom nightstand (BF-SW-0561-000024)	-	-	-
231	Sept. 16, 2018 Text exchange between Anton and Garmo re Anyone wants a favor they better come through when we need them (BF-SW-1319-000001-066)	-	-	-
232	Jan. 7, 2019 Text exchange between Anton and Garmo re 4 years from today (BF-SW-1319-000001-068)	-	-	-
233	Oct. 23, 2017 Hamel invite email (BF-SW-5576-003167)	-	-	-
234	Oct. 16, 2017 Email from Garmo to Chris.Garmo et al. Re: "****Sheriff Gore Event****" (BF-SW-5576-003138)	-	-	-
235	Oct. 16, 2017 Email from Marco G to Cherry Gomez "Re: ****Sheriff Gore Event****" (BF-SW-5576-003139)	-	-	-
236	Dec. 29, 2017 Email from Garmo to Karla Menzies "Re: CCW request" (BF SDCSD 014757)	-	-	-
237	Mar. 2, 2016 Email from Tilotta to Garmo (BF-GT-065-000068)	9/6/2022	9/6/2022	Beals
238	July 19, 2016 Text exchange between Garmo and Tilotta re cya tomorrow 10am (BF-RPTS-ATF805-114)	9/6/2022	9/6/2022	Beals
239	July 20, 2016 Text exchange between Garmo and Tilotta re just printing up some forms (BF-RPTS-ATF805-118)	-	-	-
240	Oct. 5, 2016 Text exchange between Garmo and Tilotta re Bajaj sale (BF-RPTS-ATF805-120)	9/6/2022	9/6/2022	Beals
241	Dec. 2, 2016 Text exchange between Garmo and Tilotta re thinking of applying for FFL (BF-RPTS-ATF805-141)	9/6/2022	9/6/2022	Beals
242	Apr. 22, 2017 Text exchange between Garmo and Bajaj re sorry Leo stopped by (BF-RPTS-ATF805-144)	-	-	-
243	Apr. 25, 2017 Text exchange between Garmo and Diaz re haven't even asked Gio yet (BF-RPTS-ATF805-151)	9/1/2022	9/1/2022	Diaz
244	Nov. 2, 2017 Text exchange between Garmo and Tilotta re just the guns (BF-RPTS-ATF805-153)	9/6/2022	9/6/2022	Beals
245	Feb. 6, 2018 Text exchange between Garmo and Diaz re im transferring to Leo (BF-RPTS-ATF805-154)	9/1/2022	9/1/2022	Diaz
246	May 16, 2018 Text exchange between Garmo and Diaz re can you start DROS (BF-RPTS-ATF805-155)	9/1/2022	9/1/2022	Diaz
247	June 8, 2018 Text exchange between Garmo and Tilotta re when you become sheriff (BF-RPTS-ATF805-157)	-	-	-
248	Photo of all firearms acquired by Hamel from Garmo and Magana (BF-REPORTS-007143)	9/2/2022	9/2/2022	Hamel
249	Map of Honey Badger Firearms Locations at 4349 Twain Avenue and 4304 Twain Avenue, San Diego, California (BF-REPORTS-007144)	9/6/2022	9/6/2022	Beals

MINUTES OF THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

USA

VS

Giovanni Vincenzo Tilotta (3)

Case Number: 19-cr-4768-GPC-3

EXHIBIT LIST

Jury Trial

☒ Plaintiff ☐ Defendant ☐ Court

No.	Description	Date I.D.	Date Rec'd	Witness
250	May 22 + June 9, 2016 Transfer Documents Including Form 4473 for Hamel's acquisition of a Sig Sauer P320 Compact 9mm handgun (s/n 58B024632) and a Glock 21 Gen4 .45 caliber handgun (s/n VYF569) from Garmo at Honey Badger Firearms (BF-ATF-000088)	9/2/2022	9/2/2022	Hamel
251	Photo of public entry and public parking lot at San Diego County Sheriff's Department Rancho San Diego Station (BF-REPORTS-007145)	9/6/2022	9/6/2022	Beals
252	Photo of public entrance to San Diego County Sheriff's Department Rancho San Diego Station (BF-REPORTS-007146)	9/6/2022	9/6/2022	Beals
253	Photo of non-public secured entrance to San Diego County Sheriff's Department Rancho San Diego Station (BF-REPORTS-007147)	9/6/2022	9/6/2022	Beals
254	Photo of Sig Sauer P365 9mm handgun (s/n 66A047292) (BF-REPORTS-004745)	-	-	-
255	Aerial photo of San Diego County Sheriff's Department Rancho San Diego Station (BF-REPORTS-007148)	9/6/2022	9/6/2022	Beals
256	Mar. 17, 2017 Text exchange between Garmo and Hamel re Walthers (BF-RPTS-ATF805-158)	9/6/2022	9/6/2022	Hamel
257	Sept. 15, 2017 Text exchange between Magana and Garmo re do you have Leo's guns (BF-REPORTS-003637-048)	9/1/2022	9/1/2022	Magana
258	Sept. 15, 2017 Text exchange between Magana and Hamel re 12 is a go! (BF-REPORTS-003637-050)	-	-	-
259	October 9 + 22, 2018 Transfer Documents Including Form 4473 for Garmo's acquisition of a Sig Sauer P365 9mm handgun (s/n 66A105681) (BF-REPORTS-002572)	9/6/2022	9/6/2022	Beals
260	Photo of Daniel Defense DDM4V11 (s/n DDM4107377) (see bates BF-REPORTS-004764)	9/6/2022	9/6/2022	Beals
261	First Signed Stipulations in Case No.: 19-CR-4768-GPC	8/31/2022	8/31/2022	Khoury
262	June 7, 2018 Text exchange between Garmo and Tilotta re contracting (BF-RPTS-ATF805-160)	9/6/2022	9/6/2022	Beals
264	May 1, 2017 Invoice from Omni Equipment Solutions Inc.	9/1/2022	9/1/2022	Diaz
266	July 9, 2018 Felony Complaint in People of the State of California v. Leo Joseph Hamel, case number CE382578 (first page only) (BF-HAMEL-000119)	9/6/2022	-	Hamel
267	Second Signed Stipulations in Case No.: 19-CR-4768-GPC Regarding Acero/Campagna	9/7/2022	9/7/2022	-
267a	Acero 10/16 + 10/28/16 RAS47 Transfer Documents	9/7/2022	9/7/2022	-
267b	Campagna 10/16 + 10/28/16 RAS47 Transfer Documents	9/7/2022	9/7/2022	-
529	Dec. 9, 2020 Plea Agreement in United States v. Vikas Bajaj, case number 20-cr-3905-JLB (BF-PLDG-3905-000004)	9/1/2022	-	Bajaj