

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**Case No.: 8:21-cr-348-T-SCB-SPF**

**JEREMY BROWN**  
\_\_\_\_\_ /

**NOTICE OF AGREED UPON STIPULATIONS  
AND WITNESS ACCOMODATIONS**

The Defendant, by and through undersigned Counsel, hereby informs this Honorable Court of the following stipulations and agreements by the parties:

**Evidence**

Unless otherwise ordered by this Honorable Court, the below listed documents will be placed into evidence without the need for further authentication by either party. The United States agrees that witness testimony or a stipulation may be used to establish that these records satisfy the elements of Fed. R. Evid 803(6). However, the majority of witnesses in this case have no first-hand knowledge of the content of these documents and had no involvement in their creation. Accordingly, the United States reserves the right to decide when and

whether to introduce these records during its case-in-chief, and believes that it would be inappropriate for defense counsel to reference these documents on cross-examination of witnesses who were not involved in their creation. If the United States does not introduce these records during its case-in-chief, the United States will not object to the Defense introducing these records on the specific ground that they do not satisfy Rule 803(6).

1. ERT Photographic log, dated 9/30/2021
2. Evidence collection log, dated 9/30/2021
3. Receipt for property evidence dated 9/30/2021
4. Trace report bates stamp numbers-013085-013094

### **Witnesses**

The Defense had made the following *Touhy* requests for issuance of subpoenas:

1. Expert witness FBI forensic examiner Krystal Breslin
2. Expert witness FBI forensic examiner Jill Capistrant
3. Expert witness FBI forensic examiner Kimberly Reubush
4. FBI special agent Thomas Mund.

However, based on the representation by Assistant United States Attorney Marcet, the Defense will withdraw these requests and not issue any subpoenas, as the Government will either be calling the witnesses themselves, or will continue processing the Defense's *Touhy* requests. Thus, unless ordered by this Honorable Court, no other arrangements will be made by the Defense to secure these witnesses.

Respectfully submitted, on behalf of the Defendant Jeremy Brown, through undersigned Counsel.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the foregoing motion has been furnished by electronic filing using the CM/ECF system to all interested parties on this 18 day of October, 2022.

Respectfully submitted,



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