



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RCH/JP/JS/AXB
F. #2022R01030

*610 Federal Plaza
Central Islip, New York 11722*

September 5, 2023

By ECF

The Honorable Joanna Seybert
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. George Anthony Devolder Santos
Criminal Docket No. 23-197 (JS)

Dear Judge Seybert:

The government respectfully writes in advance of the status conference scheduled in this matter for September 7, 2023 at 12:00 p.m. to request that the Court adjourn the status conference to October 27, 2023 at 10:30 a.m. and enter an order of excludable delay pursuant to Title 18, United States Code, Section 3161(h)(7)(A) from September 7, 2023 through October 27, 2023. The defendant joins in this request.

Since the last status conference in this matter on June 30, 2023, the defendant has continued to review the voluminous discoverable material previously produced by the government and requires additional time to continue reviewing that material. In addition, the government anticipates making another substantial production of discoverable material pursuant to Federal Rule of Criminal Procedure 16 this week. Defense counsel has indicated that he will need additional time to review that material as well. Further, the parties have continued to discuss possible paths forward in this matter. The parties wish to have additional time to continue those discussions.

Accordingly, the parties are jointly requesting that the Court exclude the time from September 7, 2023 through October 27, 2023, to allow defense counsel additional time to review discovery materials and for the parties to continue discussing paths forward in this

matter. See 18 U.S.C. § 3161(h)(7)(A) & (B)(iv) (time is properly excluded when the failure to exclude would deny counsel for the defendant or the attorney for the government the reasonable time necessary for effective preparation). The parties respectfully submit that the ends of justice served by such an excludable delay outweigh the best interests of the public and the defendant in a speedy trial.

Respectfully submitted,

BREON PEACE
United States Attorney

By: Ryan C. Harris
Ryan C. Harris
Anthony Bagnuola
Laura Zuckerwise
Assistant U.S. Attorneys
(718) 254-7000

COREY R. AMUNDSON
Chief, Public Integrity Section
U.S. Department of Justice

By: Jacob R. Steiner
Jacob R. Steiner
John P. Taddei
Trial Attorneys, Public Integrity Section
U.S. Department of Justice

cc: Joseph Murray, Esq. (by ECF)
Clerk of the Court (JS) (by ECF)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

GEORGE ANTHONY DEVOLDER
SANTOS,

Defendant.

----- X

ORDER OF EXCLUDABLE
DELAY

Docket No. 23-CR-197 (JS)

WHEREFORE a joint application by BREON PEACE, United States Attorney for the Eastern District of New York, by Assistant United States Attorneys Ryan C. Harris, Anthony Bagnuola, and Laura Zuckerwise, and COREY R. AMUNDSON, Chief of the Public Integrity Section of the United States Department of Justice, by Trial Attorneys John Taddei and Jacob Steiner (collectively, the “Government”) and defendant GEORGE ANTHONY DEVOLDER SANTOS, seeks an Order excluding the time period from September 7, 2023 to October 27, 2023, in computing the time within which trial must commence in the above-captioned matter, and

WHEREFORE, the Government and the defendant stipulate that they are engaged in discussions regarding possible paths forward in this matter and that defense counsel is engaged in the review of voluminous discovery materials and that the parties require an exclusion of time in order to focus efforts on their discussions, and defense counsel requires an exclusion of time for review of discovery materials without the risk that they would not, despite their diligence, have reasonable time for effective preparation for trial, and

WHEREFORE, the Court finds that the requested exclusion of time serves the ends of justice and outweighs the best interests of the public and the defendant in a speedy trial the

exclusion of time will allow all counsel to focus their efforts on those discussions and that review of material without the risk that they would be denied the reasonable time necessary for effective preparation for trial, taking into account the exercise of due diligence;

IT IS ORDERED that the period of time from September 7, 2023 to October 27, 2023, shall be excluded from the computation of time within which trial must commence in the above-captioned matter.

Dated: Central Islip, New York
September , 2023

THE HONORABLE JOANNA SEYBERT
UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK