



THE LAW OFFICES OF WILLIAM H. BRYAN III, P.A.  
ATTORNEY AT LAW

October 23, 2008

Karen Gable  
Assistant United States Attorney  
501 West Church Street  
Suite 300  
Orlando, Florida 32805

Re: Discovery Request

Dear Mrs. Gable:

I am in receipt of the discovery package that you sent to me on October 16, 2008. I thank you for providing it to me, given that you had already provided discovery materials to my client's former attorney. In reviewing the government's discovery response letter, I noted that the government did not identify any individuals serving as confidential informants during the course of the investigation giving rise to the indictment of my client and/or the civil forfeiture of his business assets. If the government is aware of any confidential informant(s) used by any law enforcement agency (to include, without limitation, the Federal Bureau of Investigation, the United States Drug Enforcement Administration, the United States Food & Drug Administration, the Internal Revenue Service, the Volusia County Bureau of Investigation, and the Volusia County Sheriff's Office) in the investigation of my client, and/or my client's businesses, we respectfully request disclosure of the identities of those individuals, pursuant to subparagraph "J" of the Criminal Scheduling Order.

Relatedly, we respectfully request copies of any investigative agency reports relating to any law enforcement interviews of or communications with Hope Conway and Ray Rutt as disclosed during my client's detention hearing. We would also respectfully request disclosure of any familial relationship between Hope Conway and United States District Judge Ann C. Conway (if any), if the government is aware of any such relationship.

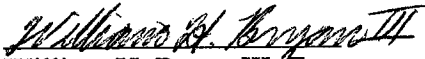
Additionally, the government's discovery response letter did not identify any cooperating defendants and/or unindicted co-conspirators that participated in the investigation of my client and/or his businesses, prior or subsequent to my client's indictment. If the government is aware of any such cooperating defendants and/or unindicted coconspirators, we respectfully request disclosure of their respective identities, the existence and substance of any payments, promises of immunity, leniency, preferential treatment, or other inducements as a prospective government witness, any impeachable prior convictions of such cooperating defendants and/or unindicted co-conspirators, and any

applications for immunity relating to such cooperating defendants and/or unindicted co-conspirators, pursuant to subparagraph "U" of the Criminal Scheduling Order.

Finally, the government's original discovery letter sent to my client's former counsel on June 17, 2008 indicated that the discovery package contained computer discs containing documents associated with undercover buys of controlled substances conducted by Karen Campbell (2 discs), Brittany O'Shea, Glenn Logan, and Ronald Jones. The government's discovery letter sent to me on October 16, 2008 indicated that it contained discs containing information relating to undercover buys conducted by Luis Battaglia, Glenn Logan, and Ronald Jones. It appears that the discovery package sent to me on October 16, 2008 did not contain information relating to undercover buys of controlled substances by Karen Campbell (2 discs) and Brittany O'Shea. We respectfully request a copy of the Karen Campbell and Brittany O'Shea undercover buy discs at your earliest convenience. Relatedly, were these undercover purchases conducted by confidential informants, cooperating defendants, and/or unindicted co-conspirators, or were these undercover purchases conducted by law enforcement officers?

Given the vast number of documents provided in discovery in this case, we respectfully request that the government provide Bate stamped copies of any future discovery documents so that the government and the defense can readily identify the universe of documents issued in discovery in this case. Again, I greatly appreciate your providing duplicate discovery materials. If you should have any questions regarding the foregoing, please do not hesitate to contact me at (407) 552-6216.

Very truly yours,

  
William H. Bryan III, Esq.