

1 NICOLA T. HANNA  
United States Attorney  
2 BRANDON D. FOX  
Assistant United States Attorney  
3 Chief, Criminal Division  
JULIAN L. ANDRÉ (Cal. Bar No. 251120)  
4 Assistant United States Attorney  
Major Frauds Section  
5 1100 United States Courthouse  
312 North Spring Street  
6 Los Angeles, California 90012  
Telephone: (213) 894-6683  
7 Facsimile: (213) 894-6269  
Email: Julian.L.Andre@usdoj.gov  
8

BRETT A. SAGEL (Cal. Bar No. 243918)  
9 Assistant United States Attorney  
Ronald Reagan Federal Building  
10 411 West Fourth Street, Suite 8000  
Santa Ana, California 92701  
11 Telephone: (714) 338-3598  
Facsimile: (714) 338-3708  
12 Email: Brett.Sagel@usdoj.gov

13 Attorneys for Plaintiff  
UNITED STATES OF AMERICA  
14

15 UNITED STATES DISTRICT COURT  
16 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
17 SOUTHERN DIVISION

18 UNITED STATES OF AMERICA,

19 Plaintiff,

20 v.

21 MICHAEL JOHN AVENATTI,

22 Defendant.  
23  
24

SA CR No. 19-061-JVS

GOVERNMENT'S REQUEST FOR INQUIRY  
REGARDING DEFENDANT MICHAEL JOHN  
AVENATTI'S POTENTIAL VIOLATIONS OF  
HIS CONDITIONS OF TEMPORARY  
RELEASE; DECLARATION OF JULIAN L.  
ANDRÉ

25 Plaintiff United States of America, by and through its counsel  
26 of record, the United States Attorney for the Central District of  
27 California and Assistant United States Attorneys Julian L. André and  
28 Brett A. Sagel, hereby files its request for the Court to conduct an

1 inquiry regarding potential violations of defendant MICHAEL JOHN  
2 AVENATTI's ("defendant") conditions of temporary release.

3 This submission is based upon the attached memorandum of points  
4 and authorities, the declaration of Assistant United States Attorney  
5 Julian L. André, the files and records in this case, and such further  
6 evidence and argument as the Court may permit.

7 Dated: June 7, 2020

Respectfully submitted,

8 NICOLA T. HANNA  
United States Attorney

9 BRANDON D. FOX  
10 Assistant United States Attorney  
Chief, Criminal Division

11   
12 JULIAN L. ANDRÉ

13 BRETT A. SAGEL  
14 Assistant United States Attorney

15 Attorneys for Plaintiff  
UNITED STATES OF AMERICA  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**MEMORANDUM OF POINTS AND AUTHORITIES**

In April 2020, this Court ordered defendant MICHAEL JOHN AVENATTI ("defendant") temporarily released from custody pursuant to 18 U.S.C. § 3142(i) due to the current public health crisis relating to COVID-19. (CR 140; CR 154.) Defendant was released to the custody of third-party custodian Jay Manheimer. (CR 140 ¶ 12; CR 154.) Among other things, the conditions of defendant's temporary release state that "defendant shall not possess, use, or access any digital devices that offer or allow internet access." (CR 140 ¶ 12; CR 154.) On or about April 13, 2020, Mr. Manheimer signed an Affidavit of Third-Party Custodian, Form CR 31, and Mr. Manheimer agreed to, among other things, notify Pretrial Services immediately if defendant violates a condition of release. (CR 143.) Based on the government's interview of Mr. Manheimer to approve him as a suitable Third-Party Custodian, Mr. Manheimer is not a lawyer.

As set forth below, defendant may have violated the conditions of his temporary release by using his third-party custodian Mr. Manheimer's computer to personally draft the past five documents that defendant has filed in this case. At a minimum, defendant and his counsel, H. Dean Steward, appear to have intentionally misled this Court when they claimed that defendant was unable to access a computer to review discovery in this case during the past six weeks (CR 164 at 2, ¶ 1; CR 167 at ¶ 3).

The government therefore requests that the Court hold a hearing to further inquire as to whether defendant has violated the conditions of his temporary release and provide the parties with an opportunity to address the appropriate remedy, if any, if defendant did in fact commit such violations.

**Defendant's May 27, 2020, Status Report (CR 164)**

On May 27, 2020, defendant, through counsel Mr. Steward, filed a 72-page Status Report, which included as exhibits four news articles pulled from the internet. (CR 164.) The metadata<sup>1</sup> for the Adobe PDF file that was submitted through the Court's CM/ECF system (CR 164) shows that the "Author" of the document was defendant's third-party custodian, "JAY MANHEIMER," and that the document was created using Microsoft Word and a Mac computer:

Case 8:19-cr-00061-JVS Document 164 Filed 05/27/20 Page 1 of 72 Page ID #:2540

**Document Properties**

Description Security Fonts Initial View Custom Advanced

Description

File: CR 164 - Defendant Status Report.pdf

Title: Final Status Report

Author: JAY MANHEIMER

Subject:

Keywords:

Created: 5/27/2020 4:45:35 PM

Modified: 5/27/2020 10:18:29 AM

Application: Word

Additional Metadata...

Advanced

PDF Producer: macOS Version 10.14.6 (Build 18G4032) Quartz PDFContext; modified using iText® 5.5.9 ©2000-2015 iText Group NV

PDF Version: 1.6 (Acrobat 7.x)

Location: \\usa.doj.gov\cloud\CAC\LA-Courthouse\Shared\Cases\CR\GBUS\CR\_Docket\

File Size: 8.74 MB (9,165,770 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 72

Tagged PDF: No

Fast Web View: No

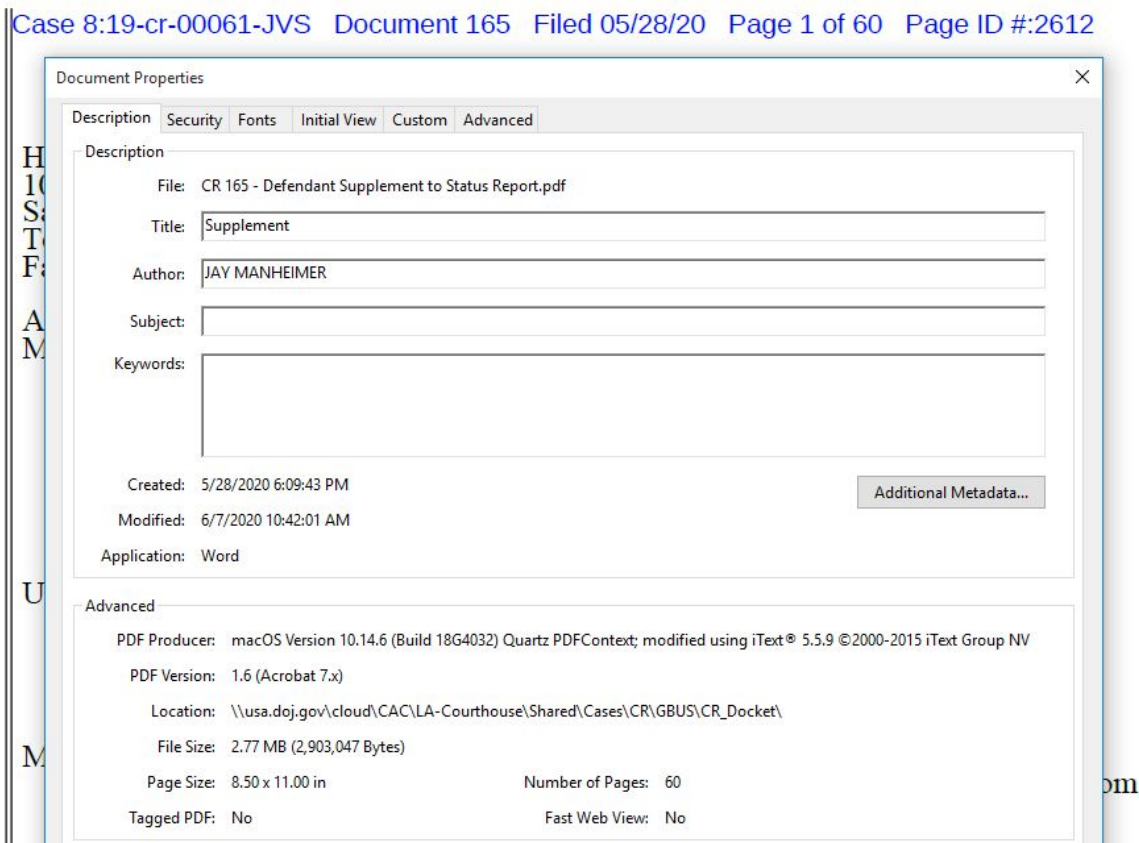
(See André Decl. Ex. 1.) Although the Status Report appears to be written and created using Mr. Manheimer's computer, defendant claimed

<sup>1</sup> The Court can view the metadata for each document defendant filed by opening the PDF file on a computer, clicking the "File" button on the top left, and selecting "Properties," and then selecting "Description."

in the Status Report that he was unable to review the discovery because he was precluded from using a computer. (CR 164 at 2, ¶ 1.)

**Defendant's May 28, 2020, Supplement to Status Report (CR 165)**

On May 28, 2020, defendant filed a Supplement to Status Report. (CR 165.) Defendant's Supplement attached another news article from the internet and an expert report that had been electronically filed in the Southern District of New York. (CR 165.) The metadata for the Adobe PDF file that was submitted through the Court's CM/ECF system (CR 165) shows that the "Author" of the document was defendant's third-party custodian, "JAY MANHEIMER," and that the document was created using Microsoft Word and a Mac computer:



(See André Decl. Ex. 2.)

**Defendant's May 29, 2020, Second Supplement (CR 167)**

In response to the Minute Order this Court issued on May 28, 2020 (CR 166), defendant filed a Second Supplement to Status Report (CR 167) on May 29, 2020. The metadata for the Adobe PDF file that was submitted through the Court's CM/ECF system (CR 167) shows that the "Author" of the document was defendant's third-party custodian, "JAY MANHEIMER," and that the document was created using Microsoft Word and a Mac computer:

Case 8:19-cr-00061-JVS Document 167 Filed 05/29/20 Page 1 of 5 Page ID #:2674

**Document Properties**

Description Security Fonts Initial View Custom Advanced

**Description**

File: CR 167 - Defendant's Second Supplement to Status Report.pdf

Title: 2nd Supplement

Author: JAY MANHEIMER

Subject:

Keywords:

Created: 5/29/2020 7:05:17 PM

Modified: 5/29/2020 1:30:31 PM

Application: Word

Additional Metadata...

**Advanced**

PDF Producer: macOS Version 10.14.6 (Build 18G4032) Quartz PDFContext; modified using iText® 5.5.9 ©2000-2015 iText Group NV

PDF Version: 1.4 (Acrobat 5.x)

Location: \\usa.doj.gov\cloud\CAC\LA-Courthouse\Shared\Cases\CR\GBUS\CR\_Docket\

File Size: 154.06 KB (157,754 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 5

Tagged PDF: No

Fast Web View: No

Help OK Cancel

(André Decl. Ex. 3.) Despite the Second Supplement to Status Report seemingly being created on Mr. Manheimer's computer, defendant stated

the he "believes the Court's suggestion [regarding a computer] is a good one and asks that the government work with the defense to accomplish this as quickly as possible." (CR 167 at 2.)

**Defendant's June 5, 2020, Status Report (CR 172)**

On June 5, 2020, defendant filed a Status Report in advance of the June 8, 2020, status conference. (CR 172.) The Status Report stated, among other things, that defendant was expected to receive a laptop computer to use to review the discovery on Monday, June 8, 2020. (CR 172 at 1.) The metadata for the Adobe PDF file that was submitted through the Court's CM/ECF system (CR 172) shows that the "Author" of the document was defendant's third-party custodian, "JAY MANHEIMER," and that the document was created using Microsoft Word and a Mac computer:

Case 8:19-cr-00061-JVS Document 172 Filed 06/05/20 Page 1 of 5 Page ID #:2718

**Document Properties**

Description Security Fonts Initial View Custom Advanced

**Description**

File: CR 172 - 2020.06.05 Defendant Status Report.pdf

Title: Status Report June 8

Author: JAY MANHEIMER

Subject:

Keywords:

Created: 6/5/2020 6:04:19 PM

Modified: 6/5/2020 12:00:48 PM

Application: Word

Additional Metadata...

**Advanced**

PDF Producer: macOS Version 10.14.6 (Build 18G4032) Quartz PDFContext; modified using iText® 5.5.9 ©2000-2015 iText Group NV

PDF Version: 1.4 (Acrobat 5.x)

Location: \\usa.doj.gov\cloud\CAC\LA-Courthouse\Shared\Cases\CR\GBUS\CR\_Docket\

File Size: 209.76 KB (214,799 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 5

Tagged PDF: No

Fast Web View: No

(André Decl. Ex. 4.)



**Defendant's June 5, 2020, Memorandum (CR 174)**

On June 5, 2020, defendant also filed a Memorandum re Allocation of Assets and the Impact on Defendant's Rights and the Trial Date. (CR 174.) As with defendant's last four filings, the metadata for the Adobe PDF file that was submitted through the Court's CM/ECF system (CR 174) shows that the "Author" of the document was defendant's third-party custodian, "JAY MANHEIMER," and that the document was created using Microsoft Word and a Mac computer:

Case 8:19-cr-00061-JVS Document 174 Filed 06/05/20 Page 1 of 16 Page ID #:2728

**Document Properties**

Description Security Fonts Initial View Custom Advanced

**Description**

File: CR 174 - 2020.06.05 Def. Brief re Representation Issues.pdf

Title:

Author: JAY MANHEIMER

Subject:

Keywords:

Created: 6/5/2020 2:00:29 PM

Modified: 6/5/2020 2:07:34 PM

Application: Word

**Advanced**

PDF Producer: macOS Version 10.14.6 (Build 18G4032) Quartz PDFContext; modified using iText® 5.5.9 ©2000-2015 iText Group NV

PDF Version: 1.6 (Acrobat 7.x)

Location: \\usa.doj.gov\cloud\CAC\LA-Courthouse\Shared\Cases\CR\GBUS\CR\_Docket\

File Size: 291.60 KB (298,594 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 16

Tagged PDF: No

Fast Web View: No

Additional Metadata...

(André Decl. Ex. 5.)



**Document's Previously Filed by Mr. Steward**

The government has also reviewed a number of the documents Mr. Steward filed on defendant's behalf before defendant was temporarily released from custody in April 2020, including defendant's March 18, 2020, bail reconsideration request (CR 117), defendant's March 24, 2020, ex parte application for a continuance (CR 122), and defendant's April 4, 2020, bail reconsideration request (CR 136). The metadata for these three documents (CR 117; CR 122; CR 136), all have the author as "leenicole" and appear to have been created using a completely different computer and PDF generator. (See André Decl. Exs. 6-8.) For example, below is the metadata for defendant's April 4, 2020, bail reconsideration request:

Case 8:19-cr-00061-JVS Document 136 Filed 04/04/20 Page 1 of 9 Page ID #:2336

Document Properties

Description Security Fonts Initial View Custom Advanced

Description

File: CR 136 - Avenatti Fourth Motion for Bond 2020.04.04.pdf

Title: Pleading Wizard

Author: leenicole

Subject:

Keywords:

Created: 4/4/2020 2:10:11 PM

Modified: 4/4/2020 3:07:44 PM

Application: Acrobat PDFMaker 11 for Word

Additional Metadata...

Advanced

PDF Producer: Adobe PDF Library 11.0; modified using iText® 5.5.9 ©2000-2015 iText Group NV (AGPL-version)

PDF Version: 1.5 (Acrobat 6.x)

Location: \\usa.doj.gov\cloud\CAC\LA-Courthouse\Shared\Cases\CR\GBUS\CR\_Docket\

File Size: 87.18 KB (89,271 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 9

Tagged PDF: Yes

Fast Web View: No

Help OK Cancel

Defendant.

(André Decl. Ex. 8.) The metadata for these three documents, which Mr. Steward filed while defendant was in custody, provide further evidence that defendant personally drafted his five most recent pleadings using his third-party custodian Mr. Manheimer's Mac computer.

To further confirm that Mr. Steward did not prepare defendant's five most recent filings in this case, and that other documents Mr. Steward have prepared would have "leenicole" identified as the "Author" in the metadata, the government also reviewed the metadata for a Supplement to Rule 29 Motion that Mr. Steward filed with this Court on May 25, 2020, in United States v. Jonathan Brightman, SA CR No. 16-076-JVS, at docket number 1085:

Case 8:16-cr-00076-JVS Document 1085 Filed 05/25/20 Page 1 of 8 Page ID #:12267

Document Properties

Description Security Fonts Initial View Custom Advanced

Description

File: 031133134787.pdf

Title: Pleading Wizard

Author: leenicole

Subject:

Keywords:

Created: 5/25/2020 4:17:49 PM

Modified: 6/7/2020 1:24:54 PM

Application: Acrobat PDFMaker 11 for Word

Additional Metadata...

Advanced

PDF Producer: Adobe PDF Library 11.0; modified using iText® 5.5.9 ©2000-2015 iText Group NV (AGPL-version)

PDF Version: 1.5 (Acrobat 6.x)

Location: C:\Users\JAndre1\Desktop\

File Size: 67.41 KB (69,029 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 8

Tagged PDF: Yes

Fast Web View: No

1 (André Decl. Ex. 9.) The metadata for the May 25, 2020, Brightman  
2 filing also lists "leenicole" as "Author," and appears to have been  
3 created using the same computer and PDF generator as the three  
4 documents Mr. Steward filed in this case while defendant was in  
5 custody.

6 Finally, statements defendant and his counsel made during the  
7 June 1, 2020, status conference further demonstrate that defendant  
8 has been personally drafting these filings. As the Court may recall,  
9 when the Court expressed concern regarding counsel's lack of candor  
10 regarding the discovery issues raised in defendant's May 27, 2020,  
11 Status Report, defendant himself responded:

12 THE COURT: Sir, I expect a greater degree of candor  
13 going forward. That's a material fact that  
14 should have been presented to the Court  
along with your concerns about the  
production.

15 MR. STEWARD: Understood, Your Honor.

16 DEFENDANT: It was included on Page 4, Footnote 5,  
17 actually.

18 THE COURT: Who is that speaking?

19 MR. STEWARD: That was my client, Your Honor.

20 (6/1/2020 RT 5:14-6:1.) And when the Court later raised concerns  
21 regarding the length and relevancy of much of defendant's 34-page May  
22 27, 2020, Status Report, defense counsel stated: "The Court is very  
23 familiar with my writing. I am usually very succinct." (6/1/2020 RT  
24 16:9-17:6.)

### 25 Conclusion

26 In light of the foregoing, the government believes that  
27 defendant has likely violated the conditions of his temporary release  
28 by using his third-party custodian Jay Manheimer's internet-

1 accessible computer to draft his last five filings in this case. At  
2 a minimum, defendant and his counsel have not been candid with this  
3 Court. Accordingly, the government requests that the Court hold a  
4 hearing to further inquire as to whether defendant has violated the  
5 conditions of his release and, if so, allow the parties an  
6 opportunity to address the appropriate remedy for any such  
7 violations. Although the government believes that the evidence  
8 contained herein is sufficient to establish that defendant violated  
9 the conditions of his temporary release, at a minimum, the government  
10 believes that the Court should direct Pretrial Services to search Mr.  
11 Manheimer's residence, including his computer, and provide the  
12 government with an opportunity to question Mr. Manheimer under oath  
13 regarding his involvement in the creation of these pleadings and/or  
14 defendant's access to Mr. Manheimer's computer and the internet.

15 Additionally, the government notes that defendant's use of  
16 Mr. Manheimer's computer to personally draft the last five pleadings  
17 in this case directly contradicts defendant's prior representations  
18 to this Court regarding his ability to use a computer. Such  
19 misrepresentations are directly relevant to the other issues  
20 currently before this Court, including defendant's representation  
21 issues and defendant's claims regarding the discovery in this matter.

22 The government will be prepared to address defendant's potential  
23 violations of his conditions of temporary release further during the  
24 June 8, 2020, status conference.

**DECLARATION OF JULIAN L. ANDRÉ**

I, Julian L. André, declare as follows:

1. I am an Assistant United States Attorney ("AUSA") in the United States Attorney's Office for the Central District of California (the "USAO"). I am one of the AUSAs assigned to represent the government in United States v. Michael John Avenatti, SA CR 19-61-JVS. I submit this declaration in support of the government's request for the Court to conduct an inquiry regarding potential violations of defendant MICHAEL JOHN AVENATTI's ("defendant") conditions of temporary release.

2. On June 7, 2020, I reviewed the metadata for a number of Adobe PDF documents that were filed on defendant's behalf in this matter through the Court's CM/ECF system. To view the metadata for each filing referenced herein, I took the following steps:

a. Using Adobe Acrobat Pro, I opened each PDF file, which I had previously downloaded from the CM/ECF system and saved onto my computer.

b. I clicked the "File" button on the top left of the Adobe Acrobat program.

c. I selected "Properties" in the "File" drop-down window.

d. I selected the "Description" tab on the "Document Properties" screen.

e. I then took a screenshot of the metadata for each PDF file.

3. Attached hereto as Exhibit 1 is a true and correct copy of a screenshot of the metadata for defendant's May 27, 2020, Status

1 Report, which was filed in this matter at docket number 164 using the  
2 Court's CM/ECF system (CR 164).

3 4. Attached hereto as Exhibit 2 is a true and correct copy of  
4 a screenshot of the metadata for defendant's May 28, 2020, Supplement  
5 to Status Report, which was filed in this matter at docket number 165  
6 using the Court's CM/ECF system (CR 165).

7 5. Attached hereto as Exhibit 3 is a true and correct copy of  
8 a screenshot of the metadata for defendant's May 29, 2020, Second  
9 Supplement Status Report, which was filed in this matter at docket  
10 number 167 using the Court's CM/ECF system (CR 167).

11 6. Attached hereto as Exhibit 4 is a true and correct copy of  
12 a screenshot of the metadata for defendant's June 5, 2020, Status  
13 Report, which was filed in this matter at docket number 172 using the  
14 Court's CM/ECF system (CR 172).

15 7. Attached hereto as Exhibit 5 is a true and correct copy of  
16 a screenshot of the metadata for defendant's June 5, 2020, Memorandum  
17 re Assets and the Impact on Defendant's Rights and the Trial Date,  
18 which was filed in this matter at docket number 174 using the Court's  
19 CM/ECF system (CR 174).

20 8. Attached hereto as Exhibit 6 is a true and correct copy of  
21 a screenshot of the metadata for defendant's March 18, 2020, Bail  
22 Reconsideration Request, which was filed in this matter at docket  
23 number 117 using the Court's CM/ECF system (CR 117).

24 9. Attached hereto as Exhibit 7 is a true and correct copy of  
25 a screenshot of the metadata for defendant's March 24, 2020, Ex Parte  
26 Application for a Continuance, which was filed in this matter at  
27 docket number 122 using the Court's CM/ECF system (CR 122).

1           10. Attached hereto as Exhibit 8 is a true and correct copy of  
2 a screenshot of the metadata for defendant's April 4, 2020, Bail  
3 Reconsideration Request, which was filed in this matter at docket  
4 number 136 using the Court's CM/ECF system (CR 136).

5           11. Attached hereto as Exhibit 9 is a true and correct copy of  
6 the metadata for the Supplement to Rule 29 Motion defendant's  
7 counsel, H. Dean Steward, filed on May 25, 2020, in United States v.  
8 Jonathan Brightman, SA CR No. 16-076-JVS, at docket number 1085 using  
9 the Court's CM/ECF system.

10           I declare under penalty of perjury under the laws of the United  
11 States of America that the foregoing is true and correct and that  
12 this declaration is executed at Los Angeles, California, on June 7,  
13 2020.

14   
15 JULIAN L. ANDRÉ



# **EXHIBIT 1**

Document Properties

Description Security Fonts Initial View Custom Advanced

Description

File: CR 164 - Defendant Status Report.pdf

Title: Final Status Report

Author: JAY MANHEIMER

Subject:

Keywords:

Created: 5/27/2020 4:45:35 PM

Modified: 5/27/2020 10:18:29 AM

Application: Word

Additional Metadata...

Advanced

PDF Producer: macOS Version 10.14.6 (Build 18G4032) Quartz PDFContext; modified using iText® 5.5.9 ©2000-2015 iText Group NV

PDF Version: 1.6 (Acrobat 7.x)

Location: \\usa.doj.gov\cloud\CAC\LA-Courthouse\Shared\Cases\CR\GBUS\CR\_Docket\

File Size: 8.74 MB (9,165,770 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 72

Tagged PDF: No

Fast Web View: No

Help OK Cancel

MICHAEL JOHN AVENATTI ("Mr. Avenatti") by and through his counsel of record,  
H. Dean Steward, hereby files this Status Report in order to bring to the Court's attention

# **EXHIBIT 2**

Document Properties

Description Security Fonts Initial View Custom Advanced

Description

File: CR 165 - Defendant Supplement to Status Report.pdf

Title: Supplement

Author: JAY MANHEIMER

Subject:

Keywords:

Created: 5/28/2020 6:09:43 PM

Modified: 6/7/2020 10:42:01 AM

Application: Word

Additional Metadata...

Advanced

PDF Producer: macOS Version 10.14.6 (Build 18G4032) Quartz PDFContext; modified using iText® 5.5.9 ©2000-2015 iText Group NV

PDF Version: 1.6 (Acrobat 7.x)

Location: \\usa.doj.gov\cloud\CAC\LA-Courthouse\Shared\Cases\CR\GBUS\CR\_Docket\

File Size: 2.77 MB (2,903,047 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 60

Tagged PDF: No

Fast Web View: No

Help OK Cancel

In advance of the status conference set in this matter for June 1, 2020, defendant MICHAEL JOHN AVENATTI (“Mr. Avenatti”) by and through his counsel of record, H. Dean Steward, hereby files this supplement to Defendant’s Status Report previously filed on May 27, 2020 [Docket No. 164].

# **EXHIBIT 3**

Document Properties

Description Security Fonts Initial View Custom Advanced

Description

File: CR 167 - Defendant's Second Supplement to Status Report.pdf

Title: 2nd Supplement

Author: JAY MANHEIMER

Subject:

Keywords:

Created: 5/29/2020 7:05:17 PM

Modified: 5/29/2020 1:30:31 PM

Application: Word

Additional Metadata...

Advanced

PDF Producer: macOS Version 10.14.6 (Build 18G4032) Quartz PDFContext; modified using iText® 5.5.9 ©2000-2015 iText Group NV

PDF Version: 1.4 (Acrobat 5.x)

Location: \\usa.doj.gov\cloud\CAC\LA-Courthouse\Shared\Cases\CR\GBUS\CR\_Docket\

File Size: 154.06 KB (157,754 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 5

Tagged PDF: No

Fast Web View: No

Help OK Cancel

In advance of the status conference set in this matter for June 1, 2020 and in brief

# **EXHIBIT 4**



Document Properties

Description Security Fonts Initial View Custom Advanced

Description

File: CR 172 - 2020.06.05 Defendant Status Report.pdf

Title: Status Report June 8

Author: JAY MANHEIMER

Subject:

Keywords:

Created: 6/5/2020 6:04:19 PM

Modified: 6/5/2020 12:00:48 PM

Application: Word

Additional Metadata...

Advanced

PDF Producer: macOS Version 10.14.6 (Build 18G4032) Quartz PDFContext; modified using iText® 5.5.9 ©2000-2015 iText Group NV

PDF Version: 1.4 (Acrobat 5.x)

Location: \\usa.doj.gov\cloud\CAC\LA-Courthouse\Shared\Cases\CR\GBUS\CR\_Docket\

File Size: 209.76 KB (214,799 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 5

Tagged PDF: No

Fast Web View: No

Help OK Cancel

Dated: June 5, 2020

Respectfully submitted,

/s/ H. Dean Steward

# **EXHIBIT 5**

Document Properties



Description Security Fonts Initial View Custom Advanced

Description

File: CR 174 - 2020.06.05 Def. Brief re Representation Issues.pdf

Title:

Author: JAY MANHEIMER

Subject:

Keywords:

Created: 6/5/2020 2:00:29 PM

Modified: 6/5/2020 2:07:34 PM

Application: Word

Additional Metadata...

Advanced

PDF Producer: macOS Version 10.14.6 (Build 18G4032) Quartz PDFContext; modified using iText® 5.5.9 ©2000-2015 iText Group NV

PDF Version: 1.6 (Acrobat 7.x)

Location: \\usa.doj.gov\cloud\CAC\LA-Courthouse\Shared\Cases\CR\GBUS\CR\_Docket\

File Size: 291.60 KB (298,594 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 16

Tagged PDF: No

Fast Web View: No

Help

OK

Cancel

H. Dean Steward, hereby files this Memorandum regarding Mr. Avenatti's allocation of assets and its alleged impact on Mr. Avenatti's rights, his defense in this case, and the trial date.

# **EXHIBIT 6**

Document Properties

Description

Security

Fonts

Initial View

Custom

Advanced

Description

File: CR 117 - Avenatti Bail Reconsideration Motion.pdf

Title: Pleading Wizard

Author: leenicole

Subject:

Keywords:

Created: 3/18/2020 2:39:24 PM

Modified: 3/19/2020 12:19:44 AM

Application: Acrobat PDFMaker 11 for Word

Additional Metadata...

Advanced

PDF Producer: Adobe PDF Library 11.0; modified using iText® 5.5.9 ©2000-2015 iText Group NV (AGPL-version)

PDF Version: 1.5 (Acrobat 6.x)

Location: \\usa.doj.gov\cloud\CAC\LA-Courthouse\Shared\Cases\CR\GBUS\CR\_Docket\

File Size: 154.34 KB (158,042 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 18

Tagged PDF: Yes

Fast Web View: No

Help

OK

Cancel

# **EXHIBIT 7**

Document Properties



Description Security Fonts Initial View Custom Advanced

Description

File: CR 122 - Ex Parte App for Continuance.pdf

Title: Pleading Wizard

Author: leenicole

Subject:

Keywords:

Created: 3/24/2020 1:40:00 PM

Additional Metadata...

Modified: 3/24/2020 3:53:07 PM

Application: Acrobat PDFMaker 11 for Word

Advanced

PDF Producer: Adobe PDF Library 11.0; modified using iText® 5.5.9 ©2000-2015 iText Group NV (AGPL-version)

PDF Version: 1.5 (Acrobat 6.x)

Location: \\usa.doj.gov\cloud\CAC\LA-Courthouse\Shared\Cases\CR\GBUS\CR\_Docket\

File Size: 47.63 KB (48,776 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 7

Tagged PDF: Yes

Fast Web View: Yes

Help

OK

Cancel



# **EXHIBIT 8**

Document Properties

Description Security Fonts Initial View Custom Advanced

Description

File: CR 136 - Avenatti Fourth Motion for Bond 2020.04.04.pdf

Title: Pleading Wizard

Author: leenicole

Subject:

Keywords:

Created: 4/4/2020 2:10:11 PM

Modified: 4/4/2020 3:07:44 PM

Application: Acrobat PDFMaker 11 for Word

Additional Metadata...

Advanced

PDF Producer: Adobe PDF Library 11.0; modified using iText® 5.5.9 ©2000-2015 iText Group NV (AGPL-version)

PDF Version: 1.5 (Acrobat 6.x)

Location: \\usa.doj.gov\cloud\CAC\LA-Courthouse\Shared\Cases\CR\GBUS\CR\_Docket\

File Size: 87.18 KB (89,271 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 9

Tagged PDF: Yes

Fast Web View: No

Help OK Cancel

Defendant.

# **EXHIBIT 9**

Document Properties

Description Security Fonts Initial View Custom Advanced

Description

File: 031133134787.pdf

Title: Pleading Wizard

Author: leenicole

Subject:

Keywords:

Created: 5/25/2020 4:17:49 PM

Modified: 6/7/2020 1:24:54 PM

Application: Acrobat PDFMaker 11 for Word

Additional Metadata...

Advanced

PDF Producer: Adobe PDF Library 11.0; modified using iText® 5.5.9 ©2000-2015 iText Group NV (AGPL-version)

PDF Version: 1.5 (Acrobat 6.x)

Location: C:\Users\JAndre1\Desktop\

File Size: 67.41 KB (69,029 Bytes)

Page Size: 8.50 x 11.00 in

Number of Pages: 8

Tagged PDF: Yes

Fast Web View: No

Help OK Cancel

19 supplements his previously foiled Rule 29 motion and alternatively, motion for new  
20 trial.  
21

22 Dated: May 25, 2020

23 /s./ H. Dean Steward  
24 H. Dean Steward  
25 Counsel for Defendant  
26 Jonathan Brightman