

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No: 1:21-cr-20005-DPG**

UNITED STATES OF AMERICA

v.

ALBERICO AHIA CRESPO,  
JORGE DIAZ GUTIERREZ,  
YANDRE TRUJILLO HERNANDEZ, and  
ANAIS LORENZO,

Defendants.

---

**JOINT STATUS REPORT**

COME NOW, the Government and the Defendants, through undersigned counsel, and hereby submit the following joint status report in compliance with this Court's Order Setting Trial Date [D.E. 66] dated March 3, 2021.

1. On January 5, 2021, Defendants ALBERICO AHIA CRESPO, JORGE DIAZ GUTIERREZ, YANDRE TRUJILLO HERNANDEZ and ANAIS LORENZO were indicted on one count of conspiracy to possess with the intent to distribute "a detectable amount" of Oxycodone (Count 1), 21 U.S.C. § 846. The indictment also charges Defendant Diaz Gutierrez with three counts (Counts 2-4) of distributing and possessing with intent to distribute a controlled substance, 21 U.S.C. § 841(a)(1), Defendant Trujillo Hernandez with two counts (Counts 3-4) of distributing and possessing with intent to distribute a controlled substance, 21 U.S.C. § 841(a)(1), Defendants Ahias Crespo and Diaz Gutierrez with one count (Count 5) of conspiracy to commit witness tampering, 18 U.S.C. § 1512(b)(3)&(k), Defendant Diaz Gutierrez with two counts (Counts 6, 8) of witness tampering, 18 U.S.C. § 1512(b)(3), Defendant Ahias Crespo with three counts (Counts 7-9) of witness tampering, 18 U.S.C. § 1512(b)(3), and Defendants Ahias

Crespo and Diaz Gutierrez with one count (Count 10) of conspiracy to obstruct justice, 18 U.S.C. § 1512(c)(2). [D.E. 46]

2. As to the status of discovery and the parties' readiness for trial, the Parties submit the following information required by this Court's Order Setting Trial Date [D.E. 66] dated March 3, 2021:

**(a) Has all discovery been provided by the Government to Defendants?  
If not, why?**

As to the first round of discovery, yes. As to the second round of discovery, the Government has advised counsel for the Defendants that, due to continuing COVID pandemic and related office logistics, there have been several delays:

(1) Various 302s/reports from the Bosch, Gonzalez, and Diaz/Crespo investigations were redacted or not provided in the first discovery production, and the Government is currently in the process of compiling unredacted reports from all 3 investigations.

(2) In the first round of discovery, the Government provided forensic analysis of Crespo's two work computers and single work cellphone. It has since come to the Government's attention that this analysis is incomplete, and the Government has since compiled full forensic analyses of all three items, although some of this production has been deemed sensitive / confidential in light of additional ongoing criminal investigations and will be segregated for in camera review to determine admissibility.

(3) AUSA Sean McLaughlin will complete a change of offices over the next week. Once this office change is complete, and once all of the second round discovery has been compiled, the Government will advise Defendants when they will receive this discovery.

(4) In addition, Defendant Crespo's [DE #65] Motion to Amend the Protective Order is pending ruling by the Court.

**(b) Are the parties ready for trial? If not, why?**

Because the discovery is very extensive, the parties are not ready for trial. Discovery presently includes one 1TB external hard drive with photos, videos, audio recordings, bank records, pharmacy prescriptions, cell phone records, patient files, transcriptions, interviews and law enforcement reports. Defendants have also been sent two external 2TB hard drives of surveillance videos that need to be reviewed and analyzed. Defendants also anticipate a second round of additional discovery as noted above.

**(c) How many days do the parties expect a trial in the matter to require?**

If the matter were to go to trial, the parties would expect the trial to require at least two (2) weeks.

**(d) Are there any other matters in this case of which the Court should be aware?**

Presently, there are no matters on behalf of Defendants Lorenzo, Trujillo Hernandez, or Diaz Gutierrez. However, as for Defendant Ahias Crespo, there is a pending motion to amend a protective order. [D.E. 61].

Respectfully submitted,

**For Plaintiff United States of America**

ARIANA FAJARDO ORSHAN  
UNITED STATES ATTORNEY

By: s/ Sean T. McLaughlin

SEAN T. McLAUGHLIN  
Assistant United States Attorney  
Court No. A5501121  
11200 NW 20th Street, Suite 101  
Miami, Florida 33172  
Tel: (305) 715-7642/7654

Fax: (305) 715-7639  
Email: Sean.McLaughlin@usdoj.gov

**Counsel for Defendant Alberico Ahias Crespo**

SEITLES & LITWIN, P.A.  
Courthouse Center  
40 N.W. 3rd Street, Penthouse One  
Miami, Florida 33128  
Telephone: (305) 403-8070  
Facsimile: (305) 403-8210  
Email: mseitles@seitleslaw.com

By: s/ Marc David Seitles  
MARC DAVID SEITLES, ESQ.  
Florida Bar No. 178284

JOSE M. QUINON, P.A.  
2333 Brickell Avenue, Suite A-1  
Miami, Florida 33129  
Tel. (305) 858-5700  
Fax (786) 358-7848  
Email: [jquinon@quinonlaw.com](mailto:jquinon@quinonlaw.com)

By: s/Jose M. Quinon  
JOSE M. QUINON, ESQ.  
Florida Bar No. 201944

**Counsel for Defendant Jorge Diaz Gutierrez**

MICHAEL CARUSO  
FEDERAL PUBLIC DEFENDER  
150 West Flagler Street, Suite 1700  
Miami, Florida 33130  
Telephone: (305) 530-7000  
Facsimile: (305) 536-4559  
Email: joaquin\_padilla@fd.org

By: s/ Joaquin E. Padilla  
JOAQUIN E. PADILLA, ESQ.  
Assistant Federal Public Defender

**Counsel for Defendant Yandre Trujillo Hernandez**

A.R.A. LAW  
4000 Ponce de Leon Blvd., Suite 470

Coral Gables, Florida 33134  
Telephone: (305) 775-0063  
Email: armandoalfonsoesq@bellsouth.net

By: s/ *Armando R. Alfonso, III*  
ARMANDO ROBERTO ALFONSO, III, ESQ.  
Florida Bar No. 88523

**Counsel for Defendant Anais Lorenzo**

ROGER CABRERA, P.A.  
Wells Fargo Center  
333 SE 2nd Avenue, Suite 2000  
Miami, Florida 33131  
Telephone: (305) 823-8383  
Facsimile: (305) 675-7970  
Email: roger@cabrera.legal

By: /s/ *Roger Cabrera*  
ROGER CABRERA, ESQ.  
Florida Bar No. 0148740

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on this 17<sup>th</sup> day of March 2021, a true and correct copy of the foregoing was uploaded via the CM / ECF case filing system and thereby delivered to all parties and counsel of record.

s/ *Roger Cabrera*  
ROGER CABRERA, ESQ.