

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

**CASE NO. 19-20693-CR-UNGARO**

**UNITED STATES OF AMERICA**

**v.**

**PETER SOTIS and  
EMILIE VOISSEM,**

**Defendants.**

---

**GOVERNMENT'S NOTICE OF EXPERT TESTIMONY**

The United States of America, by and through the undersigned Assistant United States Attorney, hereby provides notice pursuant to Fed.R.Crim.P. 16(a)(1)(G) of the Government's intent to use expert testimony in its case-in-chief at trial, and states as follows:

**Name of Witness:** James Marsh, Senior Engineer, United States Department of Defense, Defense Technology Security Administration ("DTSA")

**Training/Qualifications:** In his current role at the Defense Department, Mr. Marsh provides technical assessments of national security risks that help determine whether a Department of Commerce license would be granted for exporting rebreathers, among other dual-use items. Mr. Marsh was previously a Commander and Chief Engineer in the United States Navy and has Masters Degrees in both National Security Studies and Military Arts and Sciences. A copy of Mr. Marsh's curriculum vitae (CV) was previously sent via e-mail to defense counsel.

**Summary of Testimony/Opinion and Basis:**

Mr. Marsh's testimony will describe the licensing application process employed for dual-use items (i.e., commodities with both military and civilian applications), including the types of

information required for a license application, such as end-use and end-user information. He will also give an overview of the factors that go into determining whether a license would be granted for a rebreather to be exported to Libya, including an assessment of the national security risks.

Respectfully submitted,

ARIANA FAJARDO ORSHAN  
UNITED STATES ATTORNEY

By: s/ Michael Thakur  
MICHAEL THAKUR  
Assistant United States Attorney  
Court Id No. A5501474  
U.S. Attorney's Office - SDFL  
99 Northeast Fourth Street, 8th Floor  
Miami, Florida 33132-2111  
Telephone: (305) 961-9361  
E-mail: Michael.Thakur@usdoj.gov

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was uploaded onto the Court's CM/ECF system and sent via CM/ECF to all counsel of record on March 8, 2020.

s/ Michael Thakur

---

MICHAEL THAKUR

Assistant United States Attorney