

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 19-20693-CR-SEITZ

UNITED STATES OF AMERICA

v.

PETER SOTIS and
EMILIE VOISSEM,

Defendants.

_____ /

EXHIBIT LIST

In compliance with the Court's Trial Order, the Government is filing its final Exhibit List. Both defense counsel are still reviewing the exhibits but thus far counsel for defendant Emilie Voissem has stated that he has no objection to the government exhibits and counsel for defendant Peter Sotis has objections to the following: Exhibits 22A through 22G, 25, 29, and 29-1 through 29-4.

Government Exhibits 22A through 22G are electronic calendars that witness Shawn Robokta kept that were contemporaneous to the events at issue in this case. The government would introduce those exhibits, should the defense challenge his credibility or suggest recent fabrication, as prior consistent statements under Federal Rule of Evidence 801(d)(1)(B). Government Exhibit 25 is a Broward County Circuit Final Judgment in favor of Shawn Robokta in his civil suit with Peter Sotis. The government would introduce this exhibit to rebut claims of bias if the defense raises the civil law suit. Any credibility finding or finding of fact is redacted from the exhibit. Government Exhibits 29 and 29-1 through 29-4 are text messages between Emilie Voissem and Shawn Robotka in December 2016 and January 2017. The government would only introduce these

exhibits if Emilie Voissem testifies and such testimony is inconsistent with the messages. Counsel for Peter Sotis objects to the extent that the text messages mention Peter Sotis.

Respectfully submitted,

JUAN ANTONIO GONZALEZ
ACTING UNITED STATES ATTORNEY

By: s/ Michael Thakur
MICHAEL THAKUR
Assistant United States Attorney
Court Id No. A5501474/
Florida Bar No. 1011456
U.S. Attorney's Office - SDFL
99 Northeast Fourth Street, 8th Floor
Miami, Florida 33132-2111
E-mail: Michael.Thakur@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 4, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Michael Thakur
Assistant United States Attorney