

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN THE MATTER OF
THE SEARCH OF UDF
1301 MUNICIPAL WAY
GRAPEVINE, TEXAS 76051

No. 4:21-mc-00016-O

GOVERNMENT'S MARCH 11, 2022, SUPPLEMENT

The government previously informed the Court that it had returned all of the documents over which UDF had asserted privilege on a document-by-document basis from among the approximately 750 boxes of documents seized from UDF.¹ On March 9, 2022, the undersigned discovered a small set of documents (approximately 13 pages) located at the FBI that appear to have been segregated as potentially privileged by UDF's counsel on July 12, 2018.

On March 9, 2022, and continuing through March 11, 2022, the undersigned took additional steps to determine whether there were any other materials still remaining the FBI's possession over which UDF's counsel claimed privilege on a document-by-document basis. As a result of that review, additional documents comprising approximately six banker's boxes were identified. Although many of these documents are not privileged, and although UDF's privilege waiver applies to some of these documents, the undersigned notified UDF's counsel that these documents were

¹ Dkt. 26, Government's Supplement at 2; *see* Dkt. 33, Hr'g Tr. at 16:3-6.

nevertheless available to be retrieved from the FBI's office. At no time were these segregated documents ever in the possession of the prosecution team.

Respectfully submitted,

CHAD E. MEACHAM
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/s/ Douglas B. Brasher

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