

Amy Baggio, OSB #011920
amy@baggiolaw.com
Baggio Law
621 SW Morrison, Suite 1025
Portland, OR 97205
Tel: (503) 222-9830
Fax: (503) 274-8575

Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

No. 3:16-cr-00051-BR-03

Plaintiff,

v.

JOSEPH O'SHAUGHNESSY,

NOTICE OF WITHDRAWAL OF
DEFENDANT'S MOTION FOR
NOTICE OF SURVEILLANCE
(Doc. 545)

Defendant.

Defendant Joseph O'Shaughnessy, through counsel Amy Baggio, and on behalf of all defendants, hereby withdraws his motion for notice of surveillance and for discovery of related information.

CERTIFICATION OF CONFERRAL: Undersigned counsel Amy Baggio provided Assistant United States Attorney Ethan Knight with a copy of this Notice of Withdrawal and the government consents to the Notice.

NOTICE: Counsel for Mr. O’Shaughnessy and AUSA Knight have engaged in additional conferral regarding Mr. O’Shaughnessy’s Motion to Compel Notice of Surveillance And for Production of Related Discovery (Doc. 545). Mr. Knight reports that his office has engaged in an investigation of the sources of the evidence underlying the current charges and has inquired of, and confirmed with, relevant agents/agencies that no evidence in this case derives, directly or indirectly, from any form of National Security monitoring, such as EO12333 or Section 702 of FISA. Further, Mr. Knight represents that neither the prosecution team nor any agent working for the prosecution team has furthered their investigation of this case by accessing intelligence-community-derived information. Lastly, Mr. Knight represents that any references to “intelligence,” “intelligence analysts,” “INTELPRODS” or other references to “intel” in discovery do not involve monitoring of these defendants pursuant to a national security methods or means, either directly or as incidentally collected. Based on this further conferral, Defendant O’Shaughnessy hereby withdraws his Motion to Compel Notice (Doc. 545).

Respectfully submitted on June 24, 2016.

/s/ Amy Baggio
Amy Baggio, OSB #011920
503-222-9830
Attorney for Defendant O’Shaughnessy