

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

v.

[1] FELIX VERDEJO-SANCHEZ,,  
Defendant.

CRIMINAL NO. 21-161 (PAD)

**UNITED STATES OF AMERICA's**  
**DESIGNATION OF EVIDENCE UNDER RULE 12(b)(4)**

**COMES NOW** the United States of America, through its attorneys and very respectfully states and prays as follows:

Pursuant to Rule 12(b)(4) of the Federal Rules of Criminal Procedure, the United States of America hereby designates as evidence in its case in chief, the following:

1. Electronic media
  - a. Grey iPhone seized from Verdejo
  - b. Galaxy A11 associated with Luis Cadíz
  - c. Silver iPhone model A1549 seized from Verdejo vehicle
  - d. White T-Mobile Galaxy SIII seized from Verdejo vehicle
  - e. Rose gold iPhone seized from Verdejo vehicle
  - f. Phone with IMEI 356553105092330
  - g. Phone with IMEI 357349099959397
  - h. Phone with IMEI 353837105791196
  - i. Phone with IMEI 359401088438186
  - j. Phone with IMEI 353998109988533
  - k. SIM Card with IMSI 310260247771299

1. Designated evidence from the electronic media includes: (1) attribution of who owned or used the device, (2) evidence regarding the location of the device, (3) communications between Mr. Verdejo-Sanchez and Ms. Rodriguez-Ortiz or members of her family, (4) communications between Mr. Verdejo-Sanchez and Mr. Cádiz-Martínez or members of his family, (5) communications between Mr. Verdejo-Sanchez and third parties around April 29, 2021 (including in the days prior and afterwards), (6) records relating to the relationship between Mr. Verdejo-Sanchez and Ms. Rodriguez-Ortiz; (7) toll records to/from these devices.
2. Records and images from AutoExpreso in April 2021
3. Messages from/to Verdejo disclosed during discovery on cellphones and social media
4. iCloud accounts produced in discovery
5. Records of financial transactions related to Verdejo produced in discovery
6. Photos of search of residence of Verdejo (Condominio San Jose Plaza) produced in discovery
7. Surveillance video of relevant scenes produced during discovery, including of the following areas:
  - a. Teodoro Moscoso Bridge
  - b. Calle Kennedy
  - c. Calle Pradera
  - d. El Autentico Isla Verde
  - e. Condominio Laguna Gardens
  - f. Carolina intersection
8. Photos of Dodge Durango produced in discovery

9. Records, including usage agreement, indicating user of Dodge Durango
10. Photos of Kia Forte and surroundings (including where Kia Forte was recovered by law enforcement) produced in discovery
11. Photos of autopsy of Keishla Rodriguez-Ortiz produced in discovery
12. Videos and photos of crime scenes, including recovery of body of Keishla Rodriguez-Ortiz, produced in discovery
13. ICF crime scenes findings, produced in discovery
14. Photos of recovery of body of Keishla Rodriguez-Ortiz, produced in discovery
15. Photos of around July 6, 2021 of area around Teodoro Moscoso Bridge and Laguna San Jose, produced in discovery
16. Wire and block tied to Keishla Rodriguez-Ortiz
17. DTOP documents related to Kia Forte and Dodge Durango
18. Firearms and accessories seized from Verdejo by law enforcement
19. Financial records of Mr. Verdejo-Sanchez, produced in discovery
20. POPR Certification of Receipt of Guns and Ammunition signed by Verdejo
21. Firearms license of Mr. Verdejo-Sanchez
22. FBI CAST analysis of geolocations of phones related to Verdejo, Rodriguez-Ortiz, Cádiz-Martínez, as well as geolocation records for phones and applications included in that analysis. This includes the relation between those locations and surveillance images and videos.
23. Documents related to pregnancy of Keishla Rodriguez-Ortiz
24. ShotSpotter recording of Teodoro Moscoso Bridge
25. Telematics from Dodge Durango

26. Statements by Mr. Verdejo-Sanchez disclosed during discovery

27. All other evidence that has been either produced to defendant in discovery or made available for defendant's inspection.

**WHEREFORE**, the United States of America respectfully requests that this Honorable Court takes notice of the aforementioned.

In San Juan, Puerto Rico, this November 18, 2022.

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the defendant.

/s/ Jonathan Gottfried  
Jonathan Gottfried  
USDC-PR G02510