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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 2:16-cr-56-RJS
LINDA SELSA JARMILLO,)	
)	
Defendant.)	Hon. Robert J. Shelby

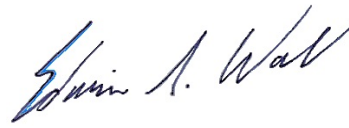
REQUEST FOR DISCLOSURE OF *GIGLIO* MATERIALS

COMES NOW the defendant, Linda S. Jarmillo, by and through her attorney, Edwin S. Wall, and moves the government be ordered to disclose and produce any and all information, material, documents, memoranda, or other data or information concerning the credibility of any witnesses, including but not limited to all promises, inducements, negotiations, and agreements, either express or implied, made to any witness known to the prosecution, or which should be known to law enforcement upon making due and diligent inquiry, pursuant to Giglio v. United States, 405 U.S. 150, 92 S.Ct. 763, 31 L.Ed.2d 104 (1972). Presently, the United States Attorney's Office has a policy of requiring any witness, including law enforcement officer or agent, who is going to testify to self-report any *Giglio* issues. The prosecution should affirmatively inquire of each of the witnesses it intends to call regarding *Giglio* matters.

Defendant and expressly requests that the United States give notice immediately upon determining that it will rely upon such evidence, and that the government give its assurance that it will provide such notice in no event less than 14 days prior to trial pursuant to Rule 16(d), Fed. R. Crim. P. and DUCrimR 16-1(c).

Respectfully submitted February 11, 2016.

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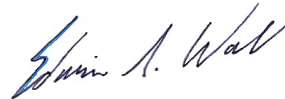
Edwin S. Wall
Attorney at Law

CERTIFICATE OF SERVICE

I, Edwin S. Wall, hereby certify that on February 11, 2016, I served a copy of the foregoing Motion for Disclosure of Giglio Materials upon counsel for the Plaintiff in this matter, by mailing it to the following address:

Michael Gadd, SAUSA
United States Attorneys Office
185 South State Street, Ste. 300
Salt Lake City, Utah 84111

348 East South Temple
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Edwin S. Wall,
Attorney for the Defendant