factual and procedural background of this prosecution. The Court then details the Government's many search-warrant and disclosure-related failures and urges structural solutions. This factual recitation is based on information provided by the Government. The Court then narrows its focus to a single piece of evidence disclosed mid-trial, and concludes that the Government both violated its disclosure obligations and subsequently made a misrepresentation to the Court about

3

Case 1:18-cr-00224-AJN Document 379 Filed 09/16/20 Page 4 of 42

its conduct. The Court finally orders additional fact-finding and briefing to determine whether