

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA	:	Case No.: 21-cr-312-JEB
	:	
v.	:	
	:	
BRADLEY STUART BENNETT,	:	
	:	
Defendant.	:	

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**NOTICE OF FILING DISCOVERY CORRESPONDENCE**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, files its May 17, 2021, discovery letter, memorializing discovery sent on this same day, which is served as an attachment via ECF on counsel for Defendant.

Respectfully submitted,

CHANNING D. PHILLIPS  
Acting United States Attorney  
D.C. Bar No. 415793

By: *s/ Monica A. Stump*  
MONICA A. STUMP  
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U.S. Department of Justice

CHANNING D. PHILLIPS  
Acting United States Attorney

*District of Columbia*

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*Judiciary Center  
555 Fourth St., N.W.  
Washington, D.C. 20530*

May 17, 2021

**VIA EMAIL**

Albert Watkins  
Watkins LLC, dba  
Kodner Watkins  
1200 S. Big Bend Blvd.  
St. Louis, MO 63117  
albertswatkins@kwklaw.net

Re: *United States v. Bradley Bennett*  
Case No. 21-cr-312-JEB  
Discovery Letter No. 1

Dear Mr. Watkins:

This is to memorialize the following preliminary discovery sent you via USAfx **on May 6, 2021, May 7, 2021, May 10, 2021, May 11, 2021, May 12, 2021, and May 13, 2021**, containing the following materials:

**Under File 3377831:**

Serial 1\_1A\_01: Photograph of Bennett  
Serial FISUR 1 (SENSITIVE): Surveillance request  
Serial 2: Background information and social media information for Bennett  
Serial 2\_1782\_01-04: Facebook screenshots from Bennett's Facebook accounts  
Serial GJ 2, 1A\_01\_01 through \_01\_08, 01\_10 and 01\_12: First Third Bank records for Bennett  
Serial 4 and 1A\_02\_01 through \_02\_2: Open source, Accurant, and clear records  
Serial 5 and 1A\_03-01 and 03\_02: Facebook preservation request documents for Bennett  
Serial 6 and 1A\_04\_01: Bennett criminal history reports  
Serial FISUR 6: Surveillance request  
Serial 7 and 1A\_05\_01 and 05\_02: Twitter preservation request documents for Bennett  
Serial FISUR 7 and 1A\_06\_01: Surveillance report and log for March 10, 2021  
Serial 08\_1A\_06\_01: Screenshot of Bennett  
Serial FISUR 8 and 1A\_07\_01: Surveillance report and log for March 9, 2021

Serial 9 and 1A\_08\_02, 08\_04 through 05, and 08\_08: Tip report for Bennett and Williams and photographs and screenshots of Bennett and Williams

Serial FISUR 9 and 1A\_08\_01: Surveillance report and log for March 8, 2021

Serial 10 and 1A\_09\_01: Bennett's Facebook posting claiming Capitol Riot was a revolutionary message with screenshots

Serial FISUR 10 and 1A\_09\_01: Surveillance report and log for March 11, 2021

Serial 12 and 1A\_02\_01: Podcast interview of Bennett including audio

Serial 13 and 1A\_02\_01: Tipster video of Bennett and Williams at and inside the Capitol

Serial 14 and 1A\_03\_01, 1A\_04\_01 through 03, 04\_05 and 04\_06, 05\_01 to 05\_07: Identification of Williams, photographs and video stills of Williams and Bennett from Facebook and Instagram, Williams driver's license photograph, clear records, tip video, Bennett's profile picture on Facebook

Serial 15: Liaison with Kerr County

Serial 16\_1A\_06\_01 through \_08, 1A\_07\_01 though 07\_04, and 08\_01: Message for identification, tip video, stills from tip video, text message, Williams contact screenshot, Bennett contact screenshot, Williams photograph at Lincoln Memorial, KCSO report

Serial 17 and 1A\_04\_01 and 02 (HIGHLY SENSITIVE): Surveillance footage inside the Capitol, two still images

Serial 18\_1A\_09\_02 to 09\_07 and 10\_01 to \_03: Still images of Bennett and Williams inside the Capitol, Williams' and Bennett's drivers' license photographs, and Bennett's temporary driver's license.

Serial 21 (HIGHLY SENSITIVE): Recognition Search Report

Serial 22: Public tip review

Serial 23: Recognition Search Report

Serial 25 and 1A\_013\_01: Fugitive Letter and Arrest Warrant for Bennett

Serial 26: Late Submission Notification

Serial 28 and 1A\_015\_01: Enterprise Rent-A-Car information and Screenshot

Serial 29 and 1A\_16\_01 through \_03: Battle Born Blog information and three screenshots

Serial 30 and 1A\_17\_01 through \_02: Search warrant for prospective and historical cell site location information and a pen register for Bennett

Serial 31 and 1A\_08\_01: Search warrant execution at Williams' residence

Serial 32 and 1A\_18\_01 through \_02: Search warrant materials for Facebook

Serial 33 and 1A\_19\_01 through \_06: Call detail records from Pen Register

Serial 34 and 1A\_20\_01 through \_05: Entry of wanted person, Bennett's photograph, and arrest warrant

Serial 35: Interview of A. Fowler

Serial 36 and 1A\_21\_01 and 22\_01: Witness Communications with Bennett including audio and text message

Serial 37: Arrest of Bennett

Serial 38: Case Update

Serial 39: Surrender Arrest report

Serial 40 and 1A\_25\_01: Facebook return and image activity in DC on January 6, 2021

Serial 41 (HIGHLY SENSITIVE): Recognition and Cell Phone Reports

Serial 42 (HIGHLY SENSITIVE) and 1A\_01\_02 and 01\_04 and 05: MPD tip and Twitter profile pictures

Serial 43 and 1A\_27\_01: Arrest warrant package  
Serial 44: Search warrant for Williams' residence

**Under File 3378336:**

Serial 1\_1A\_01\_01: Williams' Identification number

Serial 1\_1A\_01\_05 and 06: Firearm search and driver's license photograph

Serial FISUR 1 and 1A\_01\_01: Surveillance request and accident form

Serial 2 (HIGHLY SENSITIVE): Tip documentation

Serial 3 and 1A\_02\_01: Video of Williams inside the U.S. Capitol and Tip video

Serial FISUR 3 and 1A\_05\_01 through 08: Surveillance report, log, and pictures for January 27, 2021

Serial 4 and 1A\_04\_01, 04\_03, 04\_05, 04\_06, and 05\_01 through 05\_07: Identification of Williams, Tip video, Facebook and Instagram pictures of Williams and Bennett, Bennett's profile picture, and Still picture of Williams inside the U.S. Capitol

Serial FISUR 4 and 1A\_02\_01: Surveillance report and log for January 25, 2021

Serial 5\_1A\_03\_03 through 05: Firearm search, Williams' Identification number, and Facebook Video of Bennett and Williams

Serial FISUR 5, 1A\_03\_01, and 1A\_04\_01 through 10: Surveillance report, log and pictures for January 28, 2021

Serial FISUR 6 and 1A\_09\_01: Surveillance report and log for March 11, 2021

Serial 7: KCSO liaison

Serial FISUR 7, 1A\_01\_01, 1A\_02\_01 and 02, 1A\_03\_01, 1A\_04\_01, 1A\_05\_01, 1A\_06\_01 and 02: Surveillance report, log and pictures for March 12, 2021

Serial 08\_1A\_06\_01 through \_08, 1A\_07\_01 though 07\_04, and 08\_01: Message for identification, tip video, stills from tip video, text message, Williams contact screenshot, Bennett contact screenshot, Williams photograph at Lincoln Memorial, KCSO report

Serial 9 and 1A\_04\_01 and 02 (HIGHLY SENSITIVE): Surveillance footage inside the Capitol, two still images

Serial 10\_1A\_09\_01 to 09\_07 and 10\_01 to \_03: Tip video, Still images of Bennett and Williams inside the Capitol, Williams' and Bennett's drivers' license photographs, and Bennett's temporary driver's license.

Serial 11 and 1A\_04\_01 through 08: E. Dean information and pictures

Serial 13 and 1A\_05\_01: Fugitive Letter and Arrest Warrant for Williams

Serial 14: Late Submission Notification

Serial 15: Search warrant at Williams' residence

Serial 17 and 1A\_015\_01: Enterprise Rent-A-Car information and Screenshot

Serial 19 and 1A\_07\_01 through 04: Arrest and transportation documents (Williams)

Serial 20: Report acknowledging CD (Williams)

Serial 21 and 1A\_08\_01: Search warrant execution at Williams' residence

Serial 22 and 1A\_09\_01, 09\_02, and 09\_05: Entry of wanted person, Williams' arrest warrant

Serial 23 and 1A\_10\_01 and 10\_02: Williams' warrant information

Serial 24 and 1A\_11\_01 through \_02: Search warrant for historical cell site location information for Williams

Serial 25 (HIGHLY SENSITIVE): Recognition Search Report

Serial 26 (SENSITIVE) and 1A\_01\_01 through \_04: File opening, Tip video, Bennett's twitter profile, tipster information

Serial 27 and 1A\_09\_01: Bennett's Facebook posting claiming Capitol Riot was a revolutionary message with screenshots

Serial 29 and 1A\_08\_02, 08\_04 through 05, and 08\_08: Tip report for Bennett and Williams and photographs and screenshots of Bennett and Williams

Serial 31 and 1A\_03\_01: Williams' Prosecution submission and subject report

Serial 32 and 1A\_27\_01: Williams' Arrest Warrant and complaint documents

Serial 33: Search warrant for Williams' residence

Bennett Facebook Photo with comments

Bennett Facebook Photos

Bennett Facebook

Bennett Facebook posts

Bennett Facebook 2

Bennett Facebook Screenshot

Bennett Facebook posts2

Bennett Facebook Photo with date

Battleborn Screenshots numbered 1 through 3

Tip video.mp4

Due to the extraordinary nature of the January 6, 2021 Capitol Attack, the government anticipates that a large volume of materials may contain information relevant to this prosecution. These materials may include, but are not limited to, surveillance video, statements of similarly situated defendants, forensic searches of electronic devices and social media accounts of similarly situated defendants, and citizen tips. The government is working to develop a system that will facilitate access to these materials. In the meantime, please let me know if there are any categories of information that you believe are particularly relevant to your client.

The discovery is unencrypted. Please contact me if you have any issues accessing the information, and to confer regarding pretrial discovery as provided in Fed. R. Crim. P. 16.1.

This material is subject to the terms of the Protective Order issued in this case.

I recognize the government's discovery obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), its progeny, and Rule 16. I will provide timely disclosure if any such material comes to light. Consistent with *Giglio*, *Ruiz*, and 18 U.S.C. § 3500, I will provide information about government witnesses prior to trial and in compliance with the court's trial management order.

I request reciprocal discovery to the fullest extent provided by Rule 16 of the Federal Rules of Criminal Procedure, including results or reports of any physical or mental examinations, or

scientific tests or experiments, and any expert witness summaries. I also request that defendant(s) disclose prior statements of any witnesses defendant(s) intends to call to testify at any hearing or trial. *See* Fed. R. Crim. P. 26.2; *United States v. Nobles*, 422 U.S. 255 (1975). I request that such material be provided on the same basis upon which the government will provide defendant(s) with materials relating to government witnesses.

Additionally, pursuant to Federal Rules of Criminal Procedure 12.1, 12.2, and 12.3, I request that defendant(s) provide the government with the appropriate written notice if defendant(s) plans to use one of the defenses referenced in those rules. Please provide any notice within the time period required by the Rules or allowed by the Court for the filing of any pretrial motions.

I will forward additional discovery as it becomes available. If you have any questions, please feel free to contact me.

Sincerely,

*/s/ Monica A. Stump*

Monica A. Stump

Assistant United States Attorney

Enclosure(s)