

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

ETHAN NORDEAN,
also known as “Rufio Panman,”
JOSEPH BIGGS,
ZACHARY REHL, and
CHARLES DONOHOE,

Defendants.

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Case No. 21-CR-175 (TJK)

GOVERNMENT’S NOTICE REGARDING DISCOVERY CORRESPONDENCE

The United States of America, by and through undersigned counsel, respectfully submits this notice of recent correspondence to defense counsel regarding discovery productions to date. Filed as attachments to this notice are letters to counsel, some of which contain limited redactions to protect personal information or matters under seal. The letters are identified in the following chart, which includes the number of the attachment as well as the date and recipient(s) of the correspondence.

Attachment	Date	Recipient(s)
1	7/28/2021	Counsel for All Defendants
2	7/28/2021	Counsel for All Defendants
3	7/28/2021	Counsel for All Defendants
4	7/29/2021	Counsel for All Defendants
5	8/9/2021	Counsel for Defendant Biggs
6	8/24/2021	Counsel for All Defendants
7	9/9/2021	Counsel for Defendant Biggs
8	9/9/2021	Counsel for Defendants Nordean, Donohoe
9	9/11/2021	Counsel for Defendants Nordean, Biggs, Donohoe
10	9/16/2021	Counsel for Defendant Nordean
11	9/16/2021	Counsel for Defendants Biggs, Rehl, Donohoe
12	9/16/2021	Counsel for Defendant Rehl
13	9/16/2021	Counsel for Defendant Rehl
14	9/20/2021	Counsel for All Defendants
15	9/20/2021	Counsel for Defendant Donohoe
16	9/20/2021	Counsel for Defendants Nordean, Biggs, Rehl

Respectfully submitted,

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

By: /s/ Luke M. Jones
LUKE M. JONES
VA Bar No. 75053
JASON B.A. MCCULLOUGH
D.C. Bar No. 998006; NY Bar No. 4544953
Assistant United States Attorneys
555 4th Street, N.W.
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U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

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

July 28, 2021

Via Email and Electronic File Transfer

Lisa Costner
Federal Public Defender MDNC
251 N. Main St. Suite 849
Winston-Salem NC 27101

J. Daniel Hull
Hull McGuire PC
888 Seventeenth Street, NW
Suite 1200
Washington, DC 20006

Shaka Johnson
Law Offices of Shaka Johnson, LLC
1333 Christian Street
Philadelphia, PA 19147

Nicholas Smith
7 East 20th Street
Suite 4R
New York, NY 10003

Re: *United States v. Ethan Nordean et al.*, Cr. No.: 21-cr-175 (TJK)

Dear Counsel:

I write to memorialize another production related to the above-captioned case as part of the government's ongoing efforts to produce preliminary discovery on an expedited basis. Specifically, today, the government produced via USAfx a collection of twenty-five surveillance videos provided by the U.S. Capitol Police. These surveillance videos depict, among other things, the movement of Joseph Biggs inside the Capitol. Please note that the materials provided

in this production have been designated Highly Sensitive under the Protective Orders entered in this case.

An list of the materials included with the production is provided below. Note that the file naming convention (as received from U.S. Capitol Police) indicates the camera number (e.g., "0102") the camera name (e.g., [REDACTED]) and the date and time.

Name	Size
✓ Files Currently on the Disc (25)	
[REDACTED]	118,023 KB
[REDACTED]	74,050 KB
[REDACTED]	28,141 KB
[REDACTED]	33,917 KB
[REDACTED]	4,880 KB
[REDACTED]	106,909 KB
[REDACTED]	45,226 KB
[REDACTED]	109,701 KB
[REDACTED]	177,652 KB
[REDACTED]	141,266 KB
[REDACTED]	80,857 KB
[REDACTED]	69,655 KB
[REDACTED]	41,492 KB
[REDACTED]	260,492 KB
[REDACTED]	145,159 KB
[REDACTED]	48,539 KB
[REDACTED]	39,905 KB
[REDACTED]	38,815 KB
[REDACTED]	16,123 KB
[REDACTED]	15,391 KB
[REDACTED]	20,698 KB
[REDACTED]	22,411 KB
[REDACTED]	16,757 KB
[REDACTED]	52,929 KB
[REDACTED]	21,933 KB



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

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July 28, 2021

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New York, NY 10003

Re: *United States v. Ethan Nordean et al.*, 21-cr-175 (TJK)
HIGHLY SENSITIVE PRODUCTION

Dear Counsel:

I write to memorialize another production related to the above-captioned case as part of the government's ongoing efforts to produce preliminary discovery on an expedited basis. Specifically, this afternoon, the government produced via USAfx two 40-minute surveillance videos provided by the U.S. Capitol Police. These surveillance videos depict the Upper West Terrace Door of the Capitol and, among other things, Ethan Nordean's entrance into the Capitol.



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

*Judiciary Center
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July 28, 2021

Via Email and Electronic Transfer

Lisa Costner
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Nicholas Smith
7 East 20th Street
Suite 4R
New York, NY 10003

Re: *United States v. Ethan Nordean et al.*, Cr. No.: 21-cr-175 (TJK)

Dear Counsel:

I write to memorialize another production related to the above-captioned case as part of the government's ongoing efforts to produce preliminary discovery on an expedited basis.

Specifically, today, the government is transmitting by USAfx to each of you the media files described in Nordean Serial 266O-SE-3380382_0000076_Import_REDACTED.pdf. As set forth therein, the CHS described certain appearances by Ethan Nordean in podcasts.

To facilitate and expedite this “cross-discovery,” **all of the materials produced from a co-defendant’s case file have been designated Sensitive pursuant to the Protective Orders entered in this case (ECF 83 and 103).** Accordingly, this entire production should be treated as Sensitive unless the materials originate from your client’s case file (and not the case file of a co-defendant). If the materials originate from your client’s case file, the designation assigned previously will continue to apply to the materials.

Please keep in mind that all of the items placed in the USAfx case-folder will be deleted automatically – some in as few as 60 days. Please let me know immediately if you have been unable to access and download the materials for your use in this case.

Please contact me should you have any questions or concerns.

Sincerely yours,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY

By: /s/ Jason McCullough
Jason B.A. McCullough
Assistant United States Attorney
555 4th Street, N.W.
Washington, D.C. 20530
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U.S. Department of Justice

Channing D. Phillips
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District of Columbia

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July 29, 2021

Via Email and FedEx

Lisa Costner
Federal Public Defender MDNC
251 N. Main St. Suite 849
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J. Daniel Hull
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888 Seventeenth Street, NW
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Washington, DC 20006

Shaka Johnson
Law Offices of Shaka Johnson, LLC
1333 Christian Street
Philadelphia, PA 19147

Nicholas Smith
7 East 20th Street
Suite 4R
New York, NY 10003

Re: *United States v. Ethan Nordean et al.*, Cr. No.: 21-cr-175 (TJK)

Dear Counsel:

I write to memorialize another production related to the above-captioned case as part of the government's ongoing efforts to produce preliminary discovery on an expedited basis.

Specifically, today, the government is transmitting by FedEx to each of you a copy of this letter and one Blu-Ray disc. The disc is labeled "DiscoveryCopy_244390_1B8_1" and "Contains ADLab and BlackLight reports of tagged/bookmarked items from evidence item

1B8.” The disc contains materials seized from FBI Case Number 266O-SE-3380382 Item 1B8, which is an Apple Macbook Pro belonging to Defendant Ethan Nordean.

The materials are contained in two forensic reports. The ADLab report contains multiple file artifacts that were seized, while the BlackLight report includes text messages that were seized.

Due to the nature of the information contained in this production, these materials have been designated “**Highly Sensitive**” under the Protective Orders that govern discovery (ECF 83 and 103), except as to Defendant Nordean, for whom no sensitivity designation applies. Among other things, these materials may contain personal information and private communications with individuals who themselves are not associated with the criminal conduct charged in this case. Please contact me should you identify materials for which you would request the government remove or reduce a sensitivity designation, and we will work to resolve the matter with you.

Please contact me should you have any questions or concerns.

Sincerely yours,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY

By: /s/ Jason McCullough
Jason McCullough
Assistant United States Attorney
555 4th Street, N.W.
Washington, D.C. 20530
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U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

*Jason B.A. McCullough
Assistant United States Attorney
Judiciary Center
555 Fourth St., N.W.
Washington, D.C. 20530
Direct Line 202-252-7233*

August 9, 2021

Via Email and Federal Express

J. Daniel Hull
Hull McGuire PC
888 Seventeenth Street, NW
Suite 1200
Washington, DC 20006

Re: United States v. Ethan Nordean et al., Cr. No.: 21-cr-175 (TJK)

Dear Counsel:

I write to memorialize another production related to the above-captioned case as part of the government’s ongoing efforts to produce preliminary discovery on an expedited basis. Specifically, today, the government is transmitting by FedEx a copy of this letter and a hard drive. The hard drive contains copies of digital evidence obtained during the execution of a search warrant at [REDACTED]. The contents of the hard drive are listed below, identified by FBI case file numbers and a description of the source of the evidence.

Item	Description
1B5	Go Pro
1B8	HP Laptop
1B18	iMac Laptop
1B20.1 – 20.3	SD Cards
1B22	Macbook Pro
1B23	Apple iPhone
1B24	MacBook Pro
1B37	SD Card from MacBook



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

*Judiciary Center
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August 24, 2021

Via Email and FedEx

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Shaka Johnson
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Philadelphia, PA 19147

Nicholas Smith
7 East 20th Street
Suite 4R
New York, NY 10003

Re: *United States v. Ethan Nordean et al.*, Cr. No.: 21-cr-175 (TJK)

Dear Counsel:

I write to memorialize another production related to the above-captioned case as part of the government's ongoing efforts to produce preliminary discovery on an expedited basis. Specifically, this evening, the government produced a collection of videos that were recovered from the iPhone 12 of Eddie Block. The FBI has advised that the 107 photo and video files were created on January 6, 2021, and the files were recovered from the device's photo and library folder (i.e., the iPhone's camera roll).

A list of the file names and file sizes has been included as an attachment hereto.

The materials described herein have been made available for download on USAfx. Please keep in mind that all of the items placed in the USAfx case-folder will be deleted automatically – some in as few as 60 days. Please let me know immediately if you have been unable to access and download the materials for your use in this case.

Please contact me should you have any questions or concerns.

Sincerely yours,























CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY

By: /s/ Jason McCullough
Jason B.A. McCullough
Assistant United States Attorney
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Attachment A

Name	Type	Size
0e13f60c425286952ac69e5e664081c2.jpg	JPG File	1,785 KB
0e13f60c425286952ac69e5e664081c2.jpg.thumbnail.large.png	PNG File	2,010 KB
1d5c4887519c3f66cda1dee2f5154512.mov	MOV Video File (VLC)	348,149 KB
2aa8fb9720c6dbc77b700dcddbe331bf.jpg	JPG File	1,813 KB
2aa8fb9720c6dbc77b700dcddbe331bf.jpg.thumbnail.large.png	PNG File	2,388 KB
4b80579e6c1220ae09a307da532ef8.jpg	JPG File	2,772 KB
4b80579e6c1220ae09a307da532ef8.jpg.thumbnail.large.png	PNG File	2,003 KB
4ccfa3cc84a79520119df8eb2918e355.jpg	JPG File	2,608 KB
4ccfa3cc84a79520119df8eb2918e355.jpg.thumbnail.large.png	PNG File	1,927 KB
06c31a9b3f20c32bcad23b8901a1b1ff.mov	MOV Video File (VLC)	511,510 KB
6c70e35cf3d4366bb2b0eb9b9dea78ce6b39bc8b4ac231b0f598c91caf464a5d....	PNG File	2,591 KB
6f36b12b7861e395be74fdea1868a474.mov	MOV Video File (VLC)	952,582 KB
7ef8f4a02900d3da3458dabec504bba3.jpg	JPG File	1,828 KB
7ef8f4a02900d3da3458dabec504bba3.jpg.thumbnail.large.png	PNG File	2,528 KB
8a9d842073eaaeecc3d9437a52879047da45122ffc744707902c1afa5b66e128.png	PNG File	2,221 KB
8c1bc426409494f635e8eba908875e77.mov	MOV Video File (VLC)	646,489 KB
8ef224c8104a74e5a81c41e07a7f985c.jpg	JPG File	2,392 KB
8ef224c8104a74e5a81c41e07a7f985c.jpg.thumbnail.large.png	PNG File	1,801 KB
9ad65acedd5661ffe791c121fa1d6487.mov	MOV Video File (VLC)	5,741 KB
9bd1fabd740c57dfff155add1dbce129.mov	MOV Video File (VLC)	12,345 KB
9be304b50e63c1310189db7f161b595b.mov	MOV Video File (VLC)	136,765 KB
9ce70490ebca655b188209cffe462f55.mov	MOV Video File (VLC)	2,710,714 KB
26a97ee19e153a9d72b30bcc1a69eff.mov	MOV Video File (VLC)	614,214 KB
027eefae57c11e421da62db35f95b32a.jpg	JPG File	1,690 KB
027eefae57c11e421da62db35f95b32a.jpg.thumbnail.large.png	PNG File	1,700 KB
28d66a48bf274b9a6e44136b67bb3a5d.mov	MOV Video File (VLC)	3,392 KB
30c6659f85574fef1ef621018dad304c.jpg	JPG File	2,601 KB
30c6659f85574fef1ef621018dad304c.jpg.thumbnail.large.png	PNG File	2,390 KB
0035f19920e0967779a4088fdb8a88a3.mov	MOV Video File (VLC)	27,281 KB
38a4e773c2ab992780229bd07a878280.mov	MOV Video File (VLC)	325,749 KB
38ad70314c256982c5a8e75b8dc89f54.jpg	JPG File	1,768 KB
38ad70314c256982c5a8e75b8dc89f54.jpg.thumbnail.large.png	PNG File	1,685 KB
42e8fc7c563aa8b747db5b321abf53.jpg	JPG File	2,578 KB
42e8fc7c563aa8b747db5b321abf53.jpg.thumbnail.large.png	PNG File	1,785 KB
44d92b1373367a998e9783f9f4d542d3.jpg	JPG File	1,933 KB
44d92b1373367a998e9783f9f4d542d3.jpg.thumbnail.large.png	PNG File	1,885 KB
60d2f4b00ac6992e17623d5e50edb92a.mp4	MP4 Video	895 KB
63af8b3b137b2f0d5dc4a6f5e52b4e33.jpg	JPG File	3,018 KB
63af8b3b137b2f0d5dc4a6f5e52b4e33.jpg.thumbnail.large.png	PNG File	2,262 KB
64a588dedb04c9438c622ce9f0968233.jpg	JPG File	2,027 KB
64a588dedb04c9438c622ce9f0968233.jpg.thumbnail.large.png	PNG File	1,873 KB
74e9f936887c83721f9090111b98b1ab.mov	MOV Video File (VLC)	38,685 KB

Name	Type	Size
90f303a8d398f0a2da2af99f523bee6c.mov	MOV Video File (VLC)	149,699 KB
183f7f32750b3a53013c92a5a96524ba.jpg	JPG File	1,639 KB
183f7f32750b3a53013c92a5a96524ba.jpg.thumbnail.large.png	PNG File	1,916 KB
300f7fb1a1db94ce8cdc4c5485d3b38582c5ff4e2f8071126fe09b1026fd9716.png	PNG File	2,582 KB
448de87a625d2b2a890f7ce0c788926a.jpeg	JPEG File	2,552 KB
448de87a625d2b2a890f7ce0c788926a.jpeg.thumbnail.large.png	PNG File	1,894 KB
473ade0426e3b45e09d771d64732a300.jpg	JPG File	2,527 KB
473ade0426e3b45e09d771d64732a300.jpg.thumbnail.large.png	PNG File	2,134 KB
486f40f14a3280fcbc9b36aa9e9045f7.jpg	JPG File	2,450 KB
486f40f14a3280fcbc9b36aa9e9045f7.jpg.thumbnail.large.png	PNG File	1,756 KB
608ae1e1cefce27a027cfe6d93a5c08e.mov	MOV Video File (VLC)	10,178 KB
0609f8419a236e7e8e82bf3b05476f8a.jpg	JPG File	2,874 KB
0609f8419a236e7e8e82bf3b05476f8a.jpg.thumbnail.large.png	PNG File	2,073 KB
851f3e95c805e6eaa215bc7cece5fdf4.mov	MOV Video File (VLC)	516,375 KB
982a0ab9303ea6b2d1aa792dcb161098.jpg	JPG File	2,474 KB
982a0ab9303ea6b2d1aa792dcb161098.jpg.thumbnail.large.png	PNG File	2,270 KB
2711b5f15b3535ae10bca58c0030937a.jpg	JPG File	2,508 KB
2711b5f15b3535ae10bca58c0030937a.jpg.thumbnail.large.png	PNG File	1,964 KB
4272b6ea311c086c5702d37eebf3acd8.mov	MOV Video File (VLC)	3,591,139 KB
5011b7d94a35e385fdfeaace1bc4fbbcdad1d252e7dc0fa602235a216d4dc2bc4.p...	PNG File	2,173 KB
6411fea9c48b4dedbd716d2dd32071d3.mov	MOV Video File (VLC)	4,239,987 KB
6899ce9498fe9c8f499a90734f65085b.mov	MOV Video File (VLC)	678,225 KB
7037f26b5bfab38ed327841c19ba0dc6ddd24f229bdc5bcc0b94326b546988fa...	PNG File	2,313 KB
09852a79b6ef3f7f0a392542b6d34044.mov	MOV Video File (VLC)	1,100,989 KB
54988dc0400a0e2a3b51738ec5a0a9ca.mov	MOV Video File (VLC)	1,795,759 KB
80295f0bb09f34ce15bc7edb7c8338e1.jpg	JPG File	1,536 KB
80295f0bb09f34ce15bc7edb7c8338e1.jpg.thumbnail.large.png	PNG File	1,742 KB
91976a741c5b647f6ea44de4fec8e0a1.jpg	JPG File	2,452 KB
91976a741c5b647f6ea44de4fec8e0a1.jpg.thumbnail.large.png	PNG File	1,757 KB
931666c8f3b7ca14446e601e048d2867.jpg	JPG File	2,556 KB
931666c8f3b7ca14446e601e048d2867.jpg.thumbnail.large.png	PNG File	1,930 KB
3597615d793743c2b66bb71505201a78.mov	MOV Video File (VLC)	17,543 KB
5478947e643862d10dce9ca2fbd1c533.mp4	MP4 Video	1,029 KB
40621180b42d40dd14bc02cd60353e19.mov	MOV Video File (VLC)	581,352 KB
5136808097d9cf6e882dfecd6cb86f95.mov	MOV Video File (VLC)	1,232,979 KB
75419402127dc286106d6c19cb06e210.mov	MOV Video File (VLC)	6,611 KB
b00e1fb151f354c0f814c7be54bca55a.jpg	JPG File	2,749 KB
b00e1fb151f354c0f814c7be54bca55a.jpg.thumbnail.large.png	PNG File	2,013 KB
b5b9821c0305a9b18a05836e67a3ca46.jpg	JPG File	1,466 KB
b5b9821c0305a9b18a05836e67a3ca46.jpg.thumbnail.large.png	PNG File	1,662 KB
b8b871324e80b6e278f70ab55e948af8.mov	MOV Video File (VLC)	17,253,698 ...
bc52a701599f711f376b695eab816ee2.mov	MOV Video File (VLC)	28,133 KB
be8bd602e435a573783016f85d138be3.mov	MOV Video File (VLC)	7,004 KB

 c7e02acdb1ccfa328c4c53e0d5e8a9e5.jpeg	JPEG File	1,738 KB
 c7e02acdb1ccfa328c4c53e0d5e8a9e5.jpeg.thumbnail.large.png	PNG File	2,285 KB
 c8f32f8b6780ca0e8dd161b88511f096.mov	MOV Video File (VLC)	114,500 KB
 cb82abb28c0c8d4101aa079c9254c7ee.jpg	JPG File	1,734 KB
 cb82abb28c0c8d4101aa079c9254c7ee.jpg.thumbnail.large.png	PNG File	1,969 KB
 cffa82a189c76c3e9c560a16c87ce73a.jpg	JPG File	2,803 KB
 cffa82a189c76c3e9c560a16c87ce73a.jpg.thumbnail.large.png	PNG File	2,055 KB
 d7bfd06ac8c7215d5dd6ec6d06f98c71.jpg	JPG File	1,582 KB
 d7bfd06ac8c7215d5dd6ec6d06f98c71.jpg.thumbnail.large.png	PNG File	2,242 KB
 d8c7793091f009e69b264f328ab39142.jpg	JPG File	3,293 KB
 d8c7793091f009e69b264f328ab39142.jpg.thumbnail.large.png	PNG File	2,446 KB
 ddcfb9b3b2a16d18dbd2a4870672c744.mov	MOV Video File (VLC)	98,368 KB
 e07f9bc0ff19b06c0d23a75f1d675bfb.jpg	JPG File	2,586 KB
 e07f9bc0ff19b06c0d23a75f1d675bfb.jpg.thumbnail.large.png	PNG File	1,869 KB
 e9f1dba630652704141dcd5922aa1a35.mov	MOV Video File (VLC)	806,522 KB
 e0396d6e5906d5b9266cd31a01dea9f2.mov	MOV Video File (VLC)	26,602 KB
 e0998825ba71788317e99b077902d982.mov	MOV Video File (VLC)	1,148,384 KB
 eced61d0aaf618d9b25e3387eb800669.jpg	JPG File	2,892 KB
 eced61d0aaf618d9b25e3387eb800669.jpg.thumbnail.large.png	PNG File	1,951 KB
 f0a5005f751d945d5423df1af498856b.mov	MOV Video File (VLC)	62,632 KB
 fcf584d806f0a629dc853367db81b21e.jpg	JPG File	4,148 KB
 fcf584d806f0a629dc853367db81b21e.jpg.thumbnail.large.png	PNG File	2,682 KB



U.S. Department of Justice

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District of Columbia

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Direct Line: 202-252-7233*

September 9, 2021

Via Email and Electronic File Transfer

J. Daniel Hull
Hull McGuire PC
888 Seventeenth Street, NW
Suite 1200
Washington, DC 20006

Re: *United States v. Ethan Nordean et al.*, Cr. No.: 21-cr-175 (TJK)

Dear Counsel:

I write to memorialize another production related to the above-captioned case as part of the government's ongoing efforts to produce preliminary discovery on an expedited basis. Specifically, this afternoon, the government produced certain materials from Mr. Biggs' case file maintained by the Federal Bureau of Investigation. Please note that the file names bear the titles as assigned by the FBI's electronic systems.

Please note that certain of the materials have been designated Sensitive and Highly Sensitive under the Protective Order entered in this case. Such materials have been produced in separate folders that have been marked "Sensitive" and "Highly Sensitive."

In addition, an index of the produced materials is included with the production. **The index has been designated Sensitive under the Protective Order.** The "titles" and "file names" that appear in the index are a reproduction of the information that exists in the FBI's electronic systems.

The materials described herein have been made available for download on USAfx. Please keep in mind that all of the items placed in the USAfx case-folder will be deleted automatically – some in as few as 60 days. Please let me know immediately if you have been unable to access and download the materials for your use in this case.



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

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

September 10, 2021

Via Email and Electronic File Transfer

Lisa Costner
Federal Public Defender MDNC
251 N. Main St. Suite 849
Winston-Salem NC 27101

Nicholas Smith
7 East 20th Street
Suite 4R
New York, NY 10003

Re: *United States v. Ethan Nordean et al.*, Cr. No.: 21-cr-175 (TJK)

Dear Counsel:

I write to memorialize another production related to the above-captioned case as part of the government's ongoing efforts to produce preliminary discovery on an expedited basis. Specifically, today, the government produced certain materials from the case file (referred to as Sentinel files) maintained by the Federal Bureau of Investigation for defendant Joseph Biggs. These materials were separately provided to counsel for Mr. Biggs.

To facilitate and expedite this "cross-discovery" of case file materials to co-defendants, **all of the materials produced from a co-defendant's case file have been designated as (at minimum) Sensitive pursuant to the Protective Orders entered in this case (ECF 83 and 103), unless the materials are designated Highly Sensitive, in which case that designation applies.**

These designation is reflected in the folder structure on USAfx. For example, materials from case files of Defendant Biggs that were originally produced to Defendant Biggs without a designation are produced to all defendants today in a folder titled "BIGGS Sentinel Files Round 2 – SENSITIVE as to NORDEAN, REHL, and DONOHOE."

An index for the produced materials has been included with the production.



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

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

September 11, 2021

Via Email and Electronic File Transfer

Nicholas Smith
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888 Seventeenth Street, NW
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Washington, DC 20006

Lisa Costner
Federal Public Defender MDNC
251 N. Main St. Suite 849
Winston-Salem NC 27101

Re: *United States v. Ethan Nordean et al.*, Cr. No.: 21-cr-175 (TJK)

Dear Counsel:

I write to memorialize another production related to the above-captioned case as part of the government's ongoing efforts to produce preliminary discovery on an expedited basis. Specifically, today, the government produced certain materials from the case file (referred to as Sentinel files) maintained by the Federal Bureau of Investigation for defendant Zachary Rehl. These materials will be provided separately to recently-appointed counsel for Mr. Rehl.

To facilitate and expedite this "cross-discovery" of case file materials to co-defendants, **all** of the materials produced from a **co-defendant's** case file have been designated as (at minimum) **Sensitive** pursuant to the **Protective Orders** entered in this case (ECF 83 and 103), unless the materials are designated **Highly Sensitive**, in which case that designation applies.



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

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

September 16, 2021

Via Email and Electronic File Transfer

Nicholas Smith
7 East 20th Street
Suite 4R
New York, NY 10003

Re: *United States v. Ethan Nordean et al.*, Cr. No.: 21-cr-175 (TJK)

Dear Counsel:

I write to memorialize another production related to the above-captioned case as part of the government's ongoing efforts to produce preliminary discovery on an expedited basis. Specifically, this afternoon, the government produced certain materials from Mr. Nordean's case file maintained by the Federal Bureau of Investigation. Please note that the file names bear the titles as assigned by the FBI's electronic systems.

Please note that certain of the materials have been designated Sensitive and Highly Sensitive under the Protective Order entered in this case. Such materials have been produced in separate folders that have been marked "Sensitive" and "Highly Sensitive."

In addition, an index of the produced materials is included with the production. The "file names" that appear in the index are a reproduction of the information that exists in the FBI's electronic systems.

The materials described herein have been made available for download on USAfx. Please keep in mind that all of the items placed in the USAfx case-folder will be deleted automatically – some in as few as 60 days. Please let me know immediately if you have been unable to access and download the materials for your use in this case.



U.S. Department of Justice

Channing D. Phillips
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Washington, D.C. 20530*

September 16, 2021

Via Email and Electronic File Transfer

Lisa Costner
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Winston-Salem NC 27101

J. Daniel Hull
Hull McGuire PC
888 Seventeenth Street, NW
Suite 1200
Washington, DC 20006

Jonathon Moseley
5765-F Burke Centre Parkway
Suite 337
Burke, Virginia 22015

Re: *United States v. Ethan Nordean et al.*, Cr. No.: 21-cr-175 (TJK)

Dear Counsel:

I write to memorialize another production related to the above-captioned case as part of the government's ongoing efforts to produce preliminary discovery on an expedited basis. Specifically, today, the government produced certain materials from the case file (referred to as Sentinel files) maintained by the Federal Bureau of Investigation for defendant Ethan Nordean. These materials were separately provided to counsel for Mr. Nordean.

To facilitate and expedite this "cross-discovery" of case file materials to co-defendants, **all** of the materials produced from a **co-defendant's** case file have been designated as (at minimum) **Sensitive** pursuant to the Protective Orders entered in this case (ECF 83 and 103), unless the materials are designated **Highly Sensitive**, in which case that designation applies.



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

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Washington, D.C. 20530*

September 16, 2021

Via Email and Electronic File Transfer

Jonathon A. Moseley
5765-F Burke Center Parkway #337
Burke, VA 22015
contact@jonmosely.com

Re: *United States v. Zachary Rehl*, Cr. No.: 21-cr-175-3 (TJK)

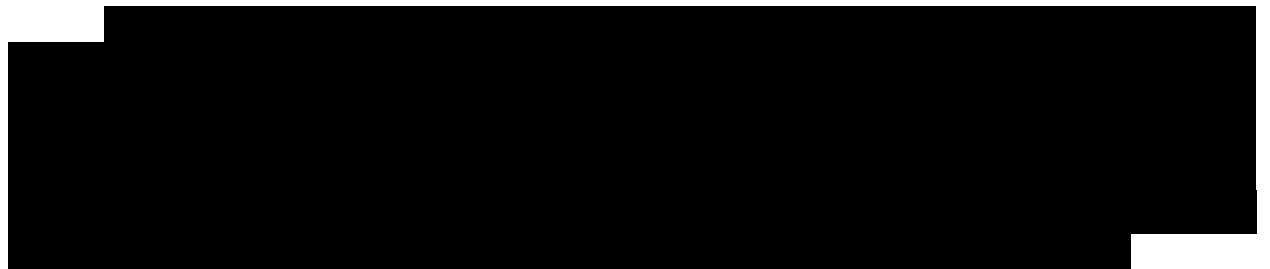
Dear Counsel:

I write in response to your letter of September 14, 2021, requesting certain discovery (related to Parler) in the above-captioned case against defendant Zachary Rehl. This letter memorializes the production of certain discovery and conveys the government's discovery requests and additional information.

As you note in your letter, you were recently retained by Mr. Rehl in this matter, replacing previous counsel, Mr. Shaka Johnson. You have confirmed your agreement to the terms of the protective order in place in this case (ECF 83). You have also indicated that you expect to obtain discovery materials that were provided by the government to Mr. Johnson. As we discussed on September 10, 2021, we are also happy to re-produce to you any discovery material that was previously provided to Mr. Johnson. Most discovery productions are provided through the USAfx file transfer system, and it is our understanding that your USAfx account is now active.

In your September 14, 2021, letter, you request material from Mr. Rehl's Parler account—specifically, a statement by Mr. Rehl on Parler at some point in December of 2020 (although the content of the statement is unclear and therefore difficult to identify). [REDACTED]

[REDACTED] The information was produced to Mr. Johnson on April 27, 2021.



Please keep in mind that all of the items placed in the USAfx case-folder will be deleted automatically – some in as few as 60 days. And please let us know immediately if you have been unable to access and download the materials for your use in this case.

I. Government’s Discovery Requests

The government hereby makes a reverse discovery request pursuant to Fed. R. Crim. P. 16(b), including, but not limited to the following:

- (1) notice of documents and tangible objects the defendant expects to introduce;
- (2) a Jencks request for all prior statements of any defense witness (excluding the defendant);
- (3) a Lewis request (for which we request the name, date of birth, sex, and social security number of each defense witness prior to trial); and
- (4) a request for information pertaining to any expert or scientific testimony or evidence.

Pursuant to Fed. R. Crim. P. 16, the government notes its continuing request to receive any material pursuant to Rule 16(b) as the case proceeds.

II. Notice of Rule 404(b) Evidence

The government may seek to admit evidence pursuant to Federal Rule of Evidence 404(b). In the event that the government seeks to introduce such evidence at trial, an appropriate notice or motion will be filed.

III. Other Information (Brady / Lewis / Giglio)

The government is aware of its *Brady* or *Giglio* obligations. If such information does exist with respect to any confidential informant(s), it will be disclosed at the appropriate time. *Lewis* information for the government’s witnesses will be provided to you at the time of trial.

We understand that our discovery obligations are ongoing and intend to supplement our disclosures on a rolling basis. If you have any questions, please do not hesitate to contact us.

Please contact us should you have any questions or concerns.



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

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

September 16, 2021

Via Email and Electronic File Transfer

Jonathon A. Moseley
5765-F Burke Center Parkway #337
Burke, VA 22015
contact@jonmosely.com

Re: *United States v. Ethan Nordean et al*, Cr. No.: 21-cr-175 (TJK)

Dear Counsel:

I write to memorialize additional productions related to the above-captioned case as part of the government's ongoing efforts to produce preliminary discovery on an expedited basis. Specifically, this afternoon, the government produced certain materials from Mr. Rehl's case file maintained by the Federal Bureau of Investigation. Please note that the file names bear the titles as assigned by the FBI's electronic systems.

The production is in two parts. The first part is a re-production of files that were provided to previous counsel for Mr. Rehl on June 2, 2021. Those files, including an index of the files, have been made available to you through USAfx in a folder named "2021.06.02_Production_FBI Sentinel Files_Part One." Please note that the files were also previously provided in "cross-discovery" to counsel for defendants Ethan Nordean, Joseph Biggs, and Charles Donohoe on July 6, 2021. (Although we understand that you have obtained or expect to obtain discovery materials from Mr. Rehl's prior counsel, the government is re-producing these materials from Mr. Rehl's FBI file to ensure you have ready access to them.)

The second part of the production contains additional materials from Mr. Rehl's FBI case file that are being provided, with an index, in a folder named "2021.09.16_Production_FBI Sentinel Files_Part Two." On September 11, 2021, prior to your appointment as counsel in this case, these files were also provided to counsel for Mr. Rehl's co-defendants in "cross-discovery." For your reference, we will provide you with copies of the cover letters from the cross-discovery productions to other counsel.



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

*Judiciary Center
555 Fourth St., N.W.
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September 20, 2021

Via Email and Electronic File Transfer

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J. Daniel Hull
Hull McGuire PC
888 Seventeenth Street, NW
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Washington, DC 20006

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5765-F Burke Centre Parkway
Suite 337
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





Nicholas Smith
7 East 20th Street
Suite 4R
New York, NY 10003



























Re: *United States v. Ethan Nordean et al.*, Cr. No.: 21-cr-175 (TJK)


























Dear Counsel:



























I write to memorialize certain productions related to the above-captioned case as part of the government's ongoing efforts to produce preliminary discovery on an expedited basis. Specifically, this letter addresses the production of materials that have been recovered to date from devices seized during the search of the residence of Eddie Block.

Exhibit A*107 Files Produced From iPhone on August 24, 2021*

Name	Updated ▾	Size
 2aa8fb9720c6dbc77b700dcddbe331bf.jpg	Aug 24, 2021 by Jason McCullough	1.8 MB
 6411fea9c48b4dedbd716d2dd32071d3.mov	Aug 24, 2021 by Jason McCullough	4 GB
 fcf584d806f0a629dc853367db81b21e.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	2.6 MB
 1d5c4887519c3f66cda1dee2f5154512.mov	Aug 24, 2021 by Jason McCullough	340 MB
 d7bfd06ac8c7215dd6ec6d06f98c71.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	2.2 MB
 0e13f60c425286952ac69e5e664081c2.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	2 MB
 fcf584d806f0a629dc853367db81b21e.jpg	Aug 24, 2021 by Jason McCullough	4.1 MB
 bc52a701599f711f376b695eab816ee2.mov	Aug 24, 2021 by Jason McCullough	27.5 MB
 e0998825ba71788317e99b077902d982.mov	Aug 24, 2021 by Jason McCullough	1.1 GB
 c7e02acdb1ccfa328c4c53e0d5e8a9e5.jpeg	Aug 24, 2021 by Jason McCullough	1.7 MB
 e0396d6e5906d5b9266cd31a01dea9f2.mov	Aug 24, 2021 by Jason McCullough	26 MB
 f0a5005f751d945d5423df1af498856b.mov	Aug 24, 2021 by Jason McCullough	61.2 MB
 eced61d0aaf618d9b25e3387eb800669.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	1.9 MB

	9ce70490ebca655b188209cffe462f55.mov	Aug 24, 2021 by Jason McCullough	2.6 GB
	c8f32f8b6780ca0e8dd161b88511f096.mov	Aug 24, 2021 by Jason McCullough	111.8 MB
	d8c7793091f009e69b264f328ab39142.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	2.4 MB
	c7e02acdb1ccfa328c4c53e0d5e8a9e5.jpeg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	2.2 MB
	cffa82a189c76c3e9c560a16c87ce73a.jpg	Aug 24, 2021 by Jason McCullough	2.7 MB
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	09852a79b6ef3f7f0a392542b6d34044.mov	Aug 24, 2021 by Jason McCullough	1 GB
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	44d92b1373367a998e9783f9f4d542d3.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	1.8 MB
	0609f8419a236e7e8e82bf3b05476f8a.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	2 MB
	75419402127dc286106d6c19cb06e210.mov	Aug 24, 2021 by Jason McCullough	6.5 MB
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	8ef224c8104a74e5a81c41e07a7f985c.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	1.8 MB
	300F7F~1.PNG	Aug 24, 2021 by Jason McCullough	2.5 MB
	38a4e773c2ab992780229bd07a878280.mov	Aug 24, 2021 by Jason McCullough	318.1 MB
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	183f7f32750b3a53013c92a5a96524ba.jpg	Aug 24, 2021 by Jason McCullough	1.6 MB
	ddcfb9b3b2a16d18dbd2a4870672c744.mov	Aug 24, 2021 by Jason McCullough	96.1 MB
	4272b6ea311c086c5702d37eebf3acd8.mov	Aug 24, 2021 by Jason McCullough	3.4 GB
	4ccfa3cc84a79520119df8eb2918e355.jpg	Aug 24, 2021 by Jason McCullough	2.5 MB
	26a97ee19e153a9d72b30bcca1a69eff.mov	Aug 24, 2021 by Jason McCullough	599.8 MB
	931666c8f3b7ca14446e601e048d2867.jpg	Aug 24, 2021 by Jason McCullough	2.5 MB
	b00e1fb151f354c0f814c7be54bca55a.jpg	Aug 24, 2021 by Jason McCullough	2.7 MB
	e07f9bc0ff19b06c0d23a75f1d675bfb.jpg	Aug 24, 2021 by Jason McCullough	2.5 MB
	38ad70314c256982c5a8e75b8dc89f54.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	1.6 MB
	80295f0bb09f34ce15bc7edb7c8338e1.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	1.7 MB
	8ef224c8104a74e5a81c41e07a7f985c.jpg	Aug 24, 2021 by Jason McCullough	2.3 MB
	851f3e95c805e6eaa215bc7cece5fdf4.mov	Aug 24, 2021 by Jason McCullough	504.3 MB
	80295f0bb09f34ce15bc7edb7c8338e1.jpg	Aug 24, 2021 by Jason McCullough	1.5 MB
	63af8b3b137b2f0d5dc4a6f5e52b4e33.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	2.2 MB
	473ade042e63b45e09d771d64732a300.jpg	Aug 24, 2021 by Jason McCullough	2.5 MB
	2711b5f15b3535ae10bca58c0030937a.jpg	Aug 24, 2021 by Jason McCullough	2.4 MB
	06c31a9b3f20c32bcad23b8901a1b1ff.mov	Aug 24, 2021 by Jason McCullough	499.5 MB
	44d92b1373367a998e9783f9f4d542d3.jpg	Aug 24, 2021 by Jason McCullough	1.9 MB
	8A9D84~1.PNG	Aug 24, 2021 by Jason McCullough	2.2 MB
	d7bfd06ac8c7215d5dd6ec6d06f98c71.jpg	Aug 24, 2021 by Jason McCullough	1.5 MB
	9be304b50e63c1310189db7f161b595b.mov	Aug 24, 2021 by Jason McCullough	133.6 MB
	30c6659f85574fef1ef621018dad304c.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	2.3 MB
	448de87a625d2b2a890f7ce0c788926a.jpeg	Aug 24, 2021 by Jason McCullough	2.5 MB

























































	7037F2~1.PNG	Aug 24, 2021 by Jason McCullough	2.3 MB
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	28d66a48bf274b9a6e44136b67bb3a5d.mov	Aug 24, 2021 by Jason McCullough	3.3 MB
	027eefae57c11e421da62db35f95b32a.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	1.7 MB
	7ef8f4a02900d3da3458dabec504bba3.jpg	Aug 24, 2021 by Jason McCullough	1.8 MB
	6C70E3~1.PNG	Aug 24, 2021 by Jason McCullough	2.5 MB
	9ad65acedd5661ffe791c121fa1d6487.mov	Aug 24, 2021 by Jason McCullough	5.6 MB
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	5136808097d9cf6e882dfecd6cb86f95.mov	Aug 24, 2021 by Jason McCullough	1.2 GB
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	38ad70314c256982c5a8e75b8dc89f54.jpg	Aug 24, 2021 by Jason McCullough	1.7 MB
	cb82abb28c0c8d4101aa079c9254c7ee.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	1.9 MB
	982a0ab9303ea6b2d1aa792dcb161098.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	2.2 MB
	be8bd602e435a573783016f85d138be3.mov	Aug 24, 2021 by Jason McCullough	6.8 MB
	90f303a8d398f0a2da2af99f523bee6c.mov	Aug 24, 2021 by Jason McCullough	146.2 MB
	4b80579e6c1220aeee09a307da532ef8.jpg	Aug 24, 2021 by Jason McCullough	2.7 MB
	7ef8f4a02900d3da3458dabec504bba3.jpg.thumbnail.large.png	Aug 24, 2021 by Jason McCullough	2.5 MB

Exhibit B*13 Files Produced From 1B81 SD Card MSD04 on August 31, 2021*

Name	Updated ▾	Size
 531b1d07ed74c3effb831925a19b9f33.lrv	Aug 31, 2021 by Jason McCullough	174.9 MB
 3f1863cfac35550d37cb22d6c91c0f34.lrv	Aug 31, 2021 by Jason McCullough	174.9 MB
 fe102ef1f849ffc684af95231b6879f8.lrv	Aug 31, 2021 by Jason McCullough	174.9 MB
 763f9bc8c6743b04c6060ad4c2e4e485.lrv	Aug 31, 2021 by Jason McCullough	174.9 MB
 c012a0c27ea34bb5640f16d7e3ecd44f.lrv	Aug 31, 2021 by Jason McCullough	174.9 MB
 bc102cfa22e18d851d0798116ea5a333.lrv	Aug 31, 2021 by Jason McCullough	54.1 MB
 e3a6ee4af9799cb853fc609eea49f30b.mp4	Aug 31, 2021 by Jason McCullough	1.2 GB
 6982e452b7b79bac61bfd936a906c6bf.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
 518b03e915c0664e4a6a337c15ef4ed2.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
 80d8c2c03b176fb153f63ec0b83aca6c.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
 7773396753d03f94c2f5316980394b2d.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
 8e1a266fa5c064c66b27b1162f37cefa.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
 1a7a4a3f78a2539b818c93dccc105f05.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB

50 Files Produced From 1B81 SD Card MSD04 on August 31, 2021

Name	Updated ▾	Size
 fe102ef1f849ffc684af95231b6879f8.lrv	Aug 31, 2021 by Jason McCullough	174.9 MB
 fdfffc3173f535df477ff772add9db97.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
 fdd7427d1923a57a14082e3d21e2b6f6.lrv	Aug 31, 2021 by Jason McCullough	175 MB
 e67a53062402745ea0e5537b7e9f9a15.lrv	Aug 31, 2021 by Jason McCullough	175 MB
 dd4ee5925afcb4973f2de5c5b2118e97.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
 d86a7122de7bf34b772ad3bff308816b.lrv	Aug 31, 2021 by Jason McCullough	174.9 MB
 d4f72a2b31853ba2afd379e5a559e485.lrv	Aug 31, 2021 by Jason McCullough	174.9 MB
 d0de73f347146081737ade1ac3a4e3e0.lrv	Aug 31, 2021 by Jason McCullough	175 MB
 c8823ff50797b0af0a2e8090f4b6060b.lrv	Aug 31, 2021 by Jason McCullough	174.9 MB
 c1cf77669120ed67657f30410fd1eb98.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
 c05551dd429da88177b44ef9c5bed5e.lrv	Aug 31, 2021 by Jason McCullough	175 MB
 bdbd0ecd85992f7518560b88d9b90b85.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
 bce73d9dca9d871c95968b09a3050899.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
 bbccd1b3714ed36030dada79f74fd095.lrv	Aug 31, 2021 by Jason McCullough	174.9 MB
 b9ebb35c0d28d2afd581d9defae0c401 (1).lrv	Aug 31, 2021 by Jason McCullough	174.9 MB ⋮ ⌂
 b8f6aeee8e46b00044e1249680462b90.lrv	Aug 31, 2021 by Jason McCullough	174.6 MB
 b6e68e1fb2c5e1ee68811be659b57b9e.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
 ad6e67939b0f4d1b1dca344e75bb4e99.lrv	Aug 31, 2021 by Jason McCullough	174.9 MB
 a87b41ca96b906c5c7241aaa242f2ce4.lrv	Aug 31, 2021 by Jason McCullough	175.1 MB
 9a0954cbadb0a704a7ea21c2c077fd67.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
 996eee28ed973555f1d169bbc45e3c17.lrv	Aug 31, 2021 by Jason McCullough	175 MB
 987427372618e1326e1997885b036d9.lrv	Aug 31, 2021 by Jason McCullough	174.9 MB
 98621c638066636a937c859726d0b2da.lrv	Aug 31, 2021 by Jason McCullough	175 MB
 8cf28b95b4fef2495577c027360e4055.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
 8b83a0de4fb8f28ae71205fb4587b834.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
 854a49f94e9ff7b6e1fd07649510ee24.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB







































	8258604fa9c14c332e4281ee47a587cd.Irv	Aug 31, 2021 by Jason McCullough	174.9 MB
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	7ad1a2a750da8e4019a7dc168e38bb34.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
	7923867141eee9160372225a4fdecbac.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
	788810319e10abd5fecdf2f6004e9fb0.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
	6ee5fb9e57326ca7d25f58ba6e69855d.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
	682eefd7d95e0cf9b6fb987be8260991.Irv	Aug 31, 2021 by Jason McCullough	174.9 MB
	664d15ba3a3141e17792bf4d302fd6da.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
	6603cae7da20ae27cbbe015a01dcb29.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
	63c2cb5e36fcf71c8951823af71d35dc.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
	5ba850ef6a43ce0706d4362a37c68e4.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
	5685d5364977e68380cc7b95c1242312.Irv	Aug 31, 2021 by Jason McCullough	174.9 MB
	53e46f2a43e8f9d463131deafa0ce15e.Irv	Aug 31, 2021 by Jason McCullough	174.9 MB
	527a31656bb6b0786614f9653ac27304.Irv	Aug 31, 2021 by Jason McCullough	174.8 MB
	4aa9877e6bfc4f514b3038048c2f12ea.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
	3aac2f3de35fd0300156c8f259c75c2c.Irv	Aug 31, 2021 by Jason McCullough	174.9 MB
	3537e9867736c40a54e03988bb608b5f.Irv	Aug 31, 2021 by Jason McCullough	175 MB
	2b2274073b9f656586539f6843efd1e2.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
	1fdd02fa63e960b3360c546c4bed7726.Irv	Aug 31, 2021 by Jason McCullough	174.9 MB
	1e85360a4618e70f747deb8a43641592.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
	1aa06ef1aceff10da6da8262016b5d89.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
	1480b08135c8ba7b0d3bcfb0c7c4d495.mp4	Aug 31, 2021 by Jason McCullough	3.7 GB
	0f916a29f4901c72d6affd5cfeccce53.Irv	Aug 31, 2021 by Jason McCullough	175 MB
	0c1058b30448d93239b16068c1b32493 (1).Irv	Aug 31, 2021 by Jason McCullough	175 MB

Exhibit C*35 Files Produced From 1B81 SD Card MSD04 on September 2, 2021*

Name	Updated ▾	Size
 feb66ca09988d54274ad6d809c4629be.lrv	Sep 2, 2021 by Jason McCullough	174.9 MB
 7f2eae293ad954f20544df2c0d72554f.mp4	Sep 2, 2021 by Jason McCullough	31.6 GB
 440ba0d9aec61f94cfef3f3b410d26ce.mp4	Sep 2, 2021 by Jason McCullough	22.7 GB
 0f04b9eadb77362100638e59abf28689.jpeg	Sep 2, 2021 by Jason McCullough	15.1 KB
 4bf01445d13f240718273a2573be4b6f.jpeg	Sep 2, 2021 by Jason McCullough	15.7 KB
 6429e116d1898eb9540ef597ccac37ad.jpeg	Sep 2, 2021 by Jason McCullough	15.3 KB
 add04607850c1aeac30c3f2dffc8f895.jpeg	Sep 2, 2021 by Jason McCullough	18 KB
 39577c80c7486a8a0d6892e3bb36c668.jpeg	Sep 2, 2021 by Jason McCullough	18.1 KB
 c7d808fe39c8a09f0487715bfa5fcbcd.jpeg	Sep 2, 2021 by Jason McCullough	17.6 KB
 605f564a15e404c787c48fa578aab55b.jpeg	Sep 2, 2021 by Jason McCullough	18.1 KB
 e14399ac477448c9e04eed9beabfd85c.jpeg	Sep 2, 2021 by Jason McCullough	15.4 KB
 c06d3457577839f100c5126ef72d7220.jpeg	Sep 2, 2021 by Jason McCullough	15.8 KB
 516cfa952ca33529a4324a8138bde841.jpeg	Sep 2, 2021 by Jason McCullough	14.6 KB
 62023be4e36e630326d1b76c1e894e5b.jpeg	Sep 2, 2021 by Jason McCullough	17.6 KB






















	e3ed7e1a4e2eb02f34e490deb6a52f94.jpeg	Sep 2, 2021 by Jason McCullough	14.7 KB
	124f96e95feb06fe14e152b469ff20b3.jpeg	Sep 2, 2021 by Jason McCullough	17.9 KB
	7d7057759f419fc5814578bddc839a4a.jpeg	Sep 2, 2021 by Jason McCullough	14.6 KB
	a9173258ebacdb5ad463880762a2f034.jpeg	Sep 2, 2021 by Jason McCullough	14.7 KB
	5fcb8a9f6e72cc3cbd72cdcb14aafb33.jpeg	Sep 2, 2021 by Jason McCullough	17 KB
	5dcabe28c8cbf8253652252a506e8a33.jpeg	Sep 2, 2021 by Jason McCullough	16.7 KB
	74d09c124e1af2429b353e8352c1c45b.jpeg	Sep 2, 2021 by Jason McCullough	17.6 KB
	ef7b466bc10b2873da2068a7449a01d.jpeg	Sep 2, 2021 by Jason McCullough	16.1 KB
	757721a6648660cd558efe212397b90d.jpeg	Sep 2, 2021 by Jason McCullough	16.4 KB
	a74bf2f7d2e81dc1a6a70b2dda74eda0.jpeg	Sep 2, 2021 by Jason McCullough	17.4 KB
	d99ca354015b358c11d53294fc74fbf0.jpeg	Sep 2, 2021 by Jason McCullough	17.8 KB
	356d86cd18e0c2e3b9193fb5e37e97fb.jpeg	Sep 2, 2021 by Jason McCullough	16.5 KB
	78332cbfea3f4fe54124b25c75f66a8b.jpeg	Sep 2, 2021 by Jason McCullough	17.3 KB
	aac816bc6a84d3d6505158c76e931dd6.jpeg	Sep 2, 2021 by Jason McCullough	17.5 KB
	bfc69ce488a7c52d248505966836ca1b.jpeg	Sep 2, 2021 by Jason McCullough	16.2 KB
	39b73617fd004252f4bcea79091cd521.jpeg	Sep 2, 2021 by Jason McCullough	13.3 KB
	8a91a0107e8c186bc91fc25d916d3076.jpeg	Sep 2, 2021 by Jason McCullough	17.4 KB
	fdf32ea3a8cb919c0ecd6e6965fc5104.jpeg	Sep 2, 2021 by Jason McCullough	17.8 KB
	51142d7c087e30c7481df8d098249c88.jpeg	Sep 2, 2021 by Jason McCullough	16.2 KB
	2516136ecd925d9aa5f20446047653e6.jpeg	Sep 2, 2021 by Jason McCullough	17.9 KB
	51ecf0e8042a6947d226773328eb8898.jpeg	Sep 2, 2021 by Jason McCullough	17.2 KB

Exhibit D*7 Files Produced From 1B81 SD Card MSD01 on September 2, 2021*








Name	Updated ▾	Size
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 b5cd82d8cb68f60c33e98d4fa82dfbab.jpeg	Sep 2, 2021 by Jason McCullough	14.7 KB
 7716386c5adabcf752279a0976f2724.jpeg	Sep 2, 2021 by Jason McCullough	17.9 KB
 7d5a0343e069d400493dc613c6bbe24.jpeg	Sep 2, 2021 by Jason McCullough	17.7 KB
 5fb212706a93552f0733c56e9540e4e2.jpeg	Sep 2, 2021 by Jason McCullough	17.4 KB
 a1cf5582aa7bc297f17446b12ead7de8.jpeg	Sep 2, 2021 by Jason McCullough	17.9 KB

Exhibit E

1 File Produced From 1B81 SD Card MSD04 on September 16, 2021

Name	Updated ▾	Size
 74b7e81e14812ea7d1e58f64756821c4.mp4	Sep 16, 2021 by Jason McCullough	3.7 GB



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

*Jason B.A. McCullough
Assistant United States Attorney
Judiciary Center
555 Fourth St., N.W.
Washington, D.C. 20530
Direct Line: 202-252-7233*

September 20, 2021

Via Email and Electronic File Transfer

Lisa Costner
Federal Public Defender's Office
Middle District of North Carolina
251 N. Main St. Suite 849
Winston-Salem NC 27101

Ira Knight
Federal Public Defender's Office
Middle District of North Carolina
301 N. Elm St., Ste. 410
Greensboro, NC 27401

Re: *United States v. Charles Donohoe*, Cr. No.: 21-cr-175 (TJK)

Dear Counsel:

I write to memorialize another production related to the above-captioned case as part of the government's ongoing efforts to produce preliminary discovery on an expedited basis. Specifically, this afternoon, the government produced certain materials from Mr. Donohoe's case file maintained by the Federal Bureau of Investigation. Please note that the file names bear the titles as assigned by the FBI's electronic systems.

In addition, an index of the produced materials is included with the production. **The index has been designated Sensitive under the Protective Order.** The "titles" and "file names" that appear in the index are a reproduction of the information that exists in the FBI's electronic systems.

The materials described herein have been made available for download on USAfx. Please keep in mind that all of the items placed in the USAfx case-folder will be deleted automatically –



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

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

September 20, 2021

Via Email and Electronic File Transfer

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Re: *United States v. Ethan Nordean et al.*, Cr. No.: 21-cr-175 (TJK)

Dear Counsel:

I write to memorialize another production related to the above-captioned case as part of the government's ongoing efforts to produce preliminary discovery on an expedited basis. Specifically, today, the government produced certain materials from the case file (referred to as Sentinel files) maintained by the Federal Bureau of Investigation for defendant Charles Donohoe. These materials were separately provided to counsel for Mr. Donohoe.

To facilitate and expedite this "cross-discovery" of case file materials to co-defendants, **all** of the materials produced from a **co-defendant's** case file have been designated as (at minimum) **Sensitive** pursuant to the Protective Orders entered in this case (ECF 83 and 103), unless the materials are designated **Highly Sensitive**, in which case that designation applies.

