UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

: CRIMINAL NO. 1:21-cr-00022-KBJ

v.

:

CHRISTOPHER RAY GRIDER

:

Defendant. :

NOTICE OF DISCOVERY

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby informs the Court and defense that the attached discovery letter of March 10, 2021, was provided to defense counsel in this matter.

Respectfully submitted,

CHANNING D. PHILLIPS Acting United States Attorney D.C. Bar # 415793

By:

Candice C. Wong

Assistant United States Attorney

D.C. Bar No. 990903

555 4th Street, N.W., Room 4816

Washington, D.C. 20530

202-252-7849

Candice.wong@usdoj.gov



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

March 10, 2021

Vila Email

Brent Mayr

Mayr Law, P.C.

Houston Office:

5300 Memorial Drive, Suite 750, Houston, TX 77007

The Woodlands Office:

1095 Evergreen Cir., Suite 200, The Woodlands, TX 77380

bmayr@mayr-law.com

Re: United States v. Christopher Grider

Case No. 1:21-cr-00022-KBJ

Dear Counsel:

Enclosed as preliminary discovery in this case, via filesharing, are the following materials:

- 1. Signed Complaint
- 2. Signed Redacted Complaint
- 3. Signed Affidavit Supporting Complaint
- 4. Signed Arrest Warrant, and Arrest Warrant Return
- 5. Indictment
- 6. 16 Screenshots of Defendant from Affidavit, Facebook Search Warrant, and Response to Motion for Revocation
- 7. NCIC Report
- 8. Law Enforcement Individual Report
- 9. Preservation letter
- 10. Debrief letter
- 11. 4 Open-Source Articles
- 12. Phone Search Warrant and Application
- 13. Vehicle Search Warrant and Application, and Return
- 14. Residence Search Warrant and Application, and Return
- 15. AT&T Subpoena Returns

- 16. Apple Subpoena Returns
- 17. Facebook Subpoena Returns
- 18. Facebook Search Warrant and Application, Return, and FBI Collected Item Log
- 19. Facebook Search Warrant Results (1 PDF, 90 linked media files)
- 20. Two 302s for Crystal Grider
- 21. U.S. Capitol Police footage (15 files, zipped)
- 22. Video of KWTX Interview of Defendant
- 23. Open-Source Videos (10 files, zipped)
- 24. 2 Videos from "bgonthescene"

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,

Candice C. Wong

Assistant United States Attorney

202-252-7849

Candice.wong@usdoj.gov