

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

DENNIS SIDORSKI,

Defendant.

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Case No: 21-cr-48(ABJ)

**NOTICE OF FILING DISCOVERY CORRESPONDENCE**

The United States of America by and through its attorney, the United States Attorney for the District of Columbia, hereby files its July 12, 2021 discovery letter in this case, which was served as an attachment via ECF on counsel for the defendant.

Respectfully submitted,

CHANNING D. PHILLIPS  
ACTING UNITED STATES ATTORNEY  
D.C. Bar No. 415793

By: /s/ Sonia Mittal  
Sonia Mittal  
Illinois Bar No. 6314706  
Special Assistant United States Attorney  
U.S. Attorney's Office for the District of Columbia  
555 Fourth Street, N.W.  
Washington, DC 20530  
Tel. (202) 252-7062  
sonia.mittal@usdoj.gov

**CERTIFICATE OF SERVICE**

On this 12th day of July 2021, a copy of the foregoing was served upon all parties listed on the Electronic Case Filing (ECF) System.

*/s/ Sonia Mittal*

Sonia Mittal

Illinois Bar No. 6314706

Special Assistant United States Attorney

U.S. Attorney's Office for the District of Columbia

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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*

July 12, 2021

VIA EMAIL

Nikki Lotze  
LOTZE MOSLEY LLP  
400 7th Street, Suite 202  
Washington, DC 20004

Re: *United States v. Dennis Siderski*  
Case No. 21-cr-48(ABJ)

Dear Counsel:

I have shared a further production of preliminary discovery in this case using the government's USAfx File Exchange System. Although you may review the entire discovery on the shared drive, in order to retain access to the discovery, you must download it immediately. The preliminary discovery consists of eight videos from the CCTV video system of the U.S. Capitol. The eight videos are designated Highly Sensitive under the protective order entered in this case.

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.

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,

Sonia Mittal  
Special Assistant United States Attorney