

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-175 (TJK)
	:	
ETHAN NORDEAN, et al.,	:	
	:	
Defendants.	:	

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. Filed as attachments to this notice are letters to counsel, identified in the following chart:

Attachment	Date	Recipients and Content
1	5/12/2022	Counsel for All Defendants (Sentinel Files via Relativity; Tarrio Superior Court files via USAfx; Videos and additional materials via hard drive)
2	6/17/2022	Counsel for All Defendants (Sentinel Files via Relativity; FBI interviews, grand jury materials, facial recognition searches of images and video files, and other materials via USAfx; additional FBI evidence via hard drive)

In addition to the above productions, the government has provided counsel with letters, not attached here, memorializing the government’s global discovery productions, including Global Production 15 (5/9/2022).

The government has identified a limited number of materials that it intends to produce to defense counsel for inspection at our office. The government submits that these materials require additional measures in order to protect the government’s legitimate interest in preserving the integrity of certain law enforcement techniques. The parties have been unable to reach agreement with respect to additional protections for these materials. The government intends to seek an addendum to the existing protective order early next week with respect to those materials, pursuant

to Fed. R. Crim. P. 16(d)(1). Once this issue is resolved, the government is prepared to make these additional materials available for inspection expeditiously.

Respectfully submitted,

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