

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

<hr/>		
UNITED STATES OF AMERICA	:	No.: 21-CR-140-JDB
	:	
v.	:	
	:	
LARRY BROCK,	:	
	:	
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, hereby files its June 21, 2021 discovery letter in this case, in reference to discovery produced in March-May 2021, which is hereby 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/ April H. Ayers-Perez  
APRIL H. AYERS-PEREZ  
Texas Bar No.: 24090975  
Assistant United States Attorney  
Detailee – Federal Major Crimes  
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Telephone No . (956) 754-0946  
April.Perez@usdoj.gov

**CERTIFICATE OF SERVICE**

On this 21st day of June, 2021, a copy of the foregoing was served on counsel of record for the defendant via the Court’s Electronic Filing System.

/s/ April H. Ayers-Perez  
April H. Ayers-Perez  
Assistant United States Attorney



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*

June 21, 2021

**Charles Burnham**  
BURNHAM & GOROKHOV PLLC  
1424 K Street, NW  
Suite 500  
Washington, DC 20005

Re: *United States v. Larry Brock*  
Case No. 1:21-cr-00140-JDB

Dear Mr. Burnham:

In accordance with Rule 16 of the Federal Rules of Criminal Procedure, and as otherwise required by law (*e.g.*, *Brady v. Maryland*, 373 U.S. 63 (1963), *United States v. Giglio*, 405 U.S. 150 (1972)), the Government has produced preliminary discovery through USAfx File no. 134638468690, which contains discovery divided into files named: Brock HIGHLY SENSITIVE Materials, Brock SENSITIVE Materials, Brock Reports, Brock Facebook SW Return, Brock Screenshots, Brock Court Documents, and Brock Capitol Video. This is all contained within a larger folder entitled Brock Discovery 21CR140. Preliminary discovery was originally uploaded to USAfx in this case on March 31, 2021, and was subsequently supplemented on May 16-27, 2021.

The following documents have been shared via USAfx in the first batch of preliminary discovery:

<b>Serial No.</b>	<b>Document/Video/Photo</b>
3	Picture sent to SA Montgomery
9	Larry Brock – Twitter image.jpg
9	Larry Brock – Twitter image2.jpg
9	Larry Brock – Twitter image3.jpg
9	Larry Brock – Facebook image.jpg
9	Larry Brock – Google image (New Yorker)

9	Larry Brock – Facebook image3.jpg
9	Larry Brock – Facebook image2.jpg
52	Screenshot.JPG
52	Brock video.mp4
54	Brock Screenshot.jpg
54	Brock Screenshot.jpeg
54	Brock Screenshot.jpg
54	Screen Shot 2021-01-09 at 3.29.28 PM

The following documents have been shared via USAfx in the second batch of preliminary discovery:

<b>Serial No.</b>	<b>Document/Video/Photo</b>
1	BROCK Opening Document
1	Larry Brock.pdf
1	BROCK L.docx
2	Subject Detail Report
2	Subject Detail Report -Larry Brock.docx
3	Opening EC – Full Investigation
3	Brock DL.pdf
3	Larry Brock CLEAR.docx
3	Larry Brock TWC103459.pdf
3	Larry Brock License to Carry103524.pdf
3	Larry Brock QH & QR103543.pdf
4	Request WFO/CTOC to add the follow...
4	Brock FD-65.xml
4	Signed-Brock Arrest Warrant.pdf
5	Crisis Intake Form
5	External Email
6	Warrant Entry
7	Criminal History and Driver's License Check
7	Larry Rendall Brock NCIC
8	MPD Tip
8	External Email – MPD Tips
9	Identification of Larry Rendall Brock
9	Larry Brock Identification.pdf
10	Face Comparison – Larry Rendall Brock (SENSITIVE)
10	Brock Comparison.pdf
11	From: notification.texttips...
12	Coverage of Lead 1381
12	Brock Accurint Report.pdf
13	MPD Tip
13	External Email – New Tip

14	Photos of Larry Brock
15	Photos of Larry Brock
16	Brock Signed Arrest Warrant
17	Preservation Request to Facebook
19	Information for Lead 1003 regarding Larry Brock
19	Brock DMV.jpg
19	CLEAR Brock.pdf
19	Brock Wants Warrants.pdf
19	Brock Criminal History
19	Brock Accurint.pdf
20	From: notificationtexttips
21	Video Collected from USCP Report (HIGHLY SENSITIVE)
21	USCP Video – 01:15 (HIGHLY SENSITIVE)
21	USCP Video – 04:31 (HIGHLY SENSITIVE)
21	USCP Video – 02:44 (HIGHLY SENSITIVE)
21	USCP Video – 02:31 (HIGHLY SENSITIVE)
21	USCP Video – 01:40 (HIGHLY SENSITIVE)
21	USCP Video – 01:25 (HIGHLY SENSITIVE)
24	Request for Preservation Records – Apple
25	Interview of [Redacted]
25	[Redacted] 302 Notes
25	Larry Brock Termination Letter.pdf
26	Video Collected from US Senate Report (HIGHLY SENSITIVE)
26	Senate Floor Video Cam 1 – 52:36 (HIGHLY SENSITIVE)
26	Senate Floor Video Cam 4 – 1:11:28 (HIGHLY SENSITIVE)
26	Senate Floor Video Cam 5 – 1:11:28 (HIGHLY SENSITIVE)
26	Senate Floor Video Cam 6 – 1:11:19 (HIGHLY SENSITIVE)
26	Senate Floor Video Cam 8 – 53:01 (HIGHLY SENSITIVE)
28	Intake Form
29	EC (FD-1057) (SENSITIVE)
29	011721-1820.pdf (SENSITIVE)
30	Interview of [Redacted]
30	[Redacted] Note 214840.pdf
31	Request for Preservation of Records – Google
32	EC (FD-1057)
33	EC (FD-1057) (SENSITIVE)
33	Larry Rendall Brock Jr. attachment
35	Interview Notes
36	Search of Residence of Larry Brock
40	Cell Phone Acquired from Arrest of Larry Brock
41	EC (FD-1057)
42	Interview Notes
43	Arrest of Larry Brock

43	Brock Arrest Warrant Signed
43	Brock NTX RCFL Receipt
46	Interview Notes
47	Interview Notes
48	Search Warrant
48	Admin Worksheet Brock
48	Photo Disc
48	FD5978Brock144533.pdf
48	Final SW Brock
48	Evidentiary Log Brock
49	Brock Initial Appearance Report
50	Brock Detention Hearing Report
50	Brock Pretrial Release Conditions
51	Paypal Account Information
51	Account Info-PayPal
51	Account Info-PayPal Attachment
52	Video Downloaded in Reference to Larry Brock (SENSITIVE)
52	Videodow (SENSITIVE)
54	Requesting Photo Comparison (SENSITIVE)
66	Request Cover Sheet
66	Digital Attachment (SENSITIVE)
67	Interview Notes of [Redacted]
69	TTK Review – Public Tip submitted (SENSITIVE)
70	Sentinal Series: (U) Opening EC
71	Apartment Floor Layout
72	Facebook and Instagram Preservation Letters
73	Larry Brock Termination Letter
73	Facebook Pictures
75	DL Photo Brock, Larry
75	DL rock, Larry
75	Brock.jpeg
76	Ping Warrant
76	Executed Ping Warrant
77	Larry Brock Property Return
77	Bock FD-597
78	Search Warrant for Electronic Devices
78	SW Brock devices 1-19-2021

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.

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.

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 disclose prior statements of any witnesses defendant 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 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/ April H. Ayers-Perez  
April H. Ayers-Perez  
Assistant United States Attorney