

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

| | | |
|---------------------------------|---|---------------------------------------|
| UNITED STATES OF AMERICA | : | |
| | : | CRIMINAL NO. 1:21-CR-00078-EGS |
| v. | : | |
| | : | |
| JOHN EARLE SULLIVAN | : | |
| | : | |
| 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 May 20, 2021, was provided to defense counsel in this matter.

Respectfully submitted,

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



By: _____
 Candice C. Wong
 Assistant United States Attorney
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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*

May 20, 2021

Via Email

Steven Kiersh
Counsel for John Earle Sullivan
5335 Wisconsin Avenue, N.W., Suite 440
Washington, D.C. 20015
skiersh@aol.com

Re: *United States v. John Earle Sullivan*
Case No. 1:21-cr-00078-EGS

Dear Counsel:

The enclosed letter memorializes the provision of the following preliminary discovery in this case, via filesharing, on May 19, 2021:

1. Video provided by link by Defendant on 1/9
2. 302 for Defendant's interview 1/11
3. HIGHLY SENSITIVE: CCTV-US Capitol Police surveillance footage (24 videos, 2 screenshots)
4. One audio recording from Defendant's voice recorder
5. Grand jury transcript and four exhibits from 2/3/2021
6. Documentation of footage transactions (9 files)
7. Square/website subpoena returns (12 files)
8. Google/website subpoena returns (7 files)
9. Google-Blogger subpoena returns (4 files)
10. Apple subpoena returns (8 files)
11. BB&T subpoena returns (2 files)
12. AFCU subpoena returns (4 files)
13. JP Morgan Chase subpoena returns (3 files)
14. Paypal-Venmo subpoena returns (29 files)
15. Discover subpoena return (1 file)
16. Twitter subpoena returns and 3 screenshots (27 files)
17. Amazon subpoena returns (3 files)

18. Amazon second subpoena returns (3 files)
19. Apple iCloud search warrant and returns (142 files)
20. Twitter search warrant and returns (1,347 files)
21. HIGHLY SENSITIVE: Architect of Capitol damaged window estimate (1 file)
22. Intercept Article 1/14
23. Metropolitan Police Department body camera footage (17 files)

In addition, the following additional discovery materials were disclosed in this case, via filesharing, on May 20, 2021:

1. Two unredacted seizure warrants, two supporting affidavits, and two returns
2. W-1 recordings (97 files)
3. Screenshot of knife

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 being provided pursuant to the Protective Order issued in this case. Please adhere to sensitivity markings.

I will forward additional discovery as it becomes available. If you have any questions, please feel free to contact me.

Sincerely,



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