

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

UNITED STATES OF AMERICA

v.

**JONATHANPETER ALLEN KLEIN and
MATTHEW LELAND KLEIN,**

Defendants.

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Case No. 21-CR-237 (RDM)

GOVERNMENT’S NOTICE REGARDING DISCOVERY CORRESPONDENCE

The United States of America, by and through undersigned counsel, respectfully submits this notice of its correspondence to defense counsel regarding discovery productions to date. Filed as attachments to this notice are letters to counsel containing information regarding the items tendered. In the attachments, certain information has been redacted. However, the letters received by defense counsel were unredacted. The letters are identified in the following chart, which includes the number of the attachment as well as the date and recipient(s) of the correspondence.

Attachment	Letter Date	Recipient(s)
1	May 5, 2021	Counsel for Both Defendants (New Counsel for Defendant Matthew Klein was provided this letter on June 1, 2021.)
2	July 8, 2021	Counsel for Defendant Jonathanpeter Klein
3	July 8, 2021	Counsel for Defendant Matthew Klein
4	July 12, 2021	Counsel for Both Defendants ¹
5	July 20, 2021	Counsel for Both Defendants

¹ This letter contained spreadsheets describing the non-sensitive, sensitive, and highly sensitive items produced as of July 12, 2021, as well as a cumulative spreadsheet reflecting all three types of produced items. Attachment 4 contains a redacted copy of the cumulative spreadsheet. The itemized versions of the spreadsheets or unredacted versions of the letters are available at the Court’s request.

Respectfully submitted,

CHANNING D. PHILLIPS
Acting United States Attorney
DC Bar No. 415793

By: /s/ Christopher K. Veatch
CHRISTOPHER K. VEATCH
Assistant United States Attorney, Detailee
IL Bar No. 6276097
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Chicago, Illinois 60604
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(312) 886-3389



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

*Judiciary Center
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Washington, D.C. 20530*

May 5, 2021

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Steven R. Kiersh, Esq.
Law Office of Steven R. Kiersh
5335 Wisconsin Avenue, NW, Suite 440
Washington, D.C. 20015

Re: *United States v. Jonathanpeter Allen Klein & Matthew Leland Klein*
Case No. 21-CR-237

Dear Counsel:

The government has prepared a significant batch of preliminary discovery in this case which will be tendered to you through the DOJ's USAfx file sharing system. These materials contain the items identified in Attachment A to this letter.

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.

This material is subject to the terms of the Protective Order issued in this case. Please note, none of the materials described in Attachment A are considered Sensitive or Highly Sensitive for the purposes of the Protective Order, at this time. However, the government reserves the right to change this designation to the extent an item's sensitivity was not properly categorized in this preliminary discovery.

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 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,

s/ Christopher K. Veatch
CHRISTOPHER K. VEATCH
Assistant United States Attorney

Attachment

**ATTACHMENT A TO MAY 5, 2021
PRELIMINARY DISCOVERY LETTER
(U.S. v. J. & M. Klein, No. 21-CR-237)**

<u>Document Date</u>	<u>Title</u>	<u>Description</u>	<u>File Name</u>
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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*

July 8, 2021

Michelle M. Sweet, Esq.
Federal Public Defender
District of Oregon
101 SW Main Street, Suite 1700
Portland, OR 97204

Re: *United States v. Jonathanpeter Allen Klein & Matthew Leland Klein*
Case No. 21-CR-237

Dear Counsel:

I am writing to give you an opportunity to obtain copies of your client's electronic devices and to view physical evidence in this case. I have attached a list of evidence seized from your client. The government will also produce in discovery reports for all accounts and electronic devices related to your client. Generally, that discovery will include a forensic report documenting the portions of the account or device that were deemed responsive to a warrant, and not the entirety of the device or account.

In the meantime, if you would like a copy of the government's extraction from any of the electronic devices on the attached list, please place an "X" in the cell next to the device(s) and return the spreadsheet to me. Extractions for computers will be E01 files that are not readily viewable without forensic software. For mobile devices, we will generally provide a Cellebrite reader report which is an executable file and will open on any Windows machine. I will contact the FBI to determine the location of any requested device(s) and to obtain a recommendation for the size and type of hard drive that will be required. I will then provide you a name and address where you can send (or have a vendor send) a hard drive to have the images loaded. The FBI will return your hard drive directly to the address you specify. Accordingly, please ensure that the hard drive is clearly labeled with the defendant's name and case number as well as a point of contact to receive the drive including, name, firm, address, and telephone number.

Generally, depending on the location and number of devices at issue, the government estimates that it could take approximately thirty days to complete this process.

Please let us know if there are additional seized accounts or devices that you seek because they belong to your client. Finally, if you would like to inspect any of the physical evidence seized in this case, please let me know.

Sincerely,

s/ Christopher K. Veatch
CHRISTOPHER K. VEATCH
Assistant United States Attorney

Enclosure(s)

Collected On	Barcode	Item Number	Case UCFN	Acquisition Event	Description	Holding Office	Evidence Type	Requested by Defense
2021-05-04	E6447871	1B17	266O-PD-3386048			PORTLAND	CART	
2021-03-20	E6448090	1B16	266O-PD-3386048			PORTLAND	CART	
2021-03-24	E6448091	1B15	266O-PD-3386048			PORTLAND	CART	
2021-03-24	E6447785	1B14	266O-PD-3386048			PORTLAND	GENERAL	
2021-03-24	E6447786	1B13	266O-PD-3386048			PORTLAND	CART	
2021-03-24	E6447787	1B12	266O-PD-3386048			PORTLAND	GENERAL	
2021-03-24	E6447788	1B11	266O-PD-3386048			PORTLAND	GENERAL	
2021-03-24	E6447789	1B10	266O-PD-3386048			PORTLAND	GENERAL	
2021-03-24	E6447790	1B9	266O-PD-3386048			PORTLAND	CART	
2021-03-24	E6447791	1B8	266O-PD-3386048			PORTLAND	GENERAL	
2021-03-24	E6447792	1B7	266O-PD-3386048			PORTLAND	GENERAL	
2021-03-24	E6447793	1B6	266O-PD-3386048			PORTLAND	GENERAL	
2021-03-24	E6447794	1B5	266O-PD-3386048			PORTLAND	GENERAL	
2021-03-24	E6447795	1B4	266O-PD-3386048			PORTLAND	GENERAL	
2021-03-24	E6447796	1B3	266O-PD-3386048			PORTLAND	GENERAL	
2021-03-24	E6447797	1B2	266O-PD-3386048			PORTLAND	GENERAL	
2021-03-30	E6566284	1D2	266O-PD-3386048			PORTLAND	CUSTODIAL_ELSUR_EVIDENCE	
2021-03-23	E6566283	1D1	266O-PD-3386048			PORTLAND	CUSTODIAL_ELSUR_EVIDENCE	
2021-03-24	E6447798	1B1	266O-PD-3386048			PORTLAND	GENERAL	



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*

July 8, 2021

Eugene Gorokhov, Esq.
Burnham & Gorokhov, PLLC
1424 K Street NW, Suite 500
Washington, D.C. 20005

Re: *United States v. Jonathanpeter Allen Klein & Matthew Leland Klein*
Case No. 21-CR-237

Dear Counsel:

I am writing to give you an opportunity to obtain copies of your client's electronic devices and to view physical evidence in this case. I have attached a list of evidence seized from your client. The government will also produce in discovery reports for all accounts and electronic devices related to your client. Generally, that discovery will include a forensic report documenting the portions of the account or device that were deemed responsive to a warrant, and not the entirety of the device or account.

In the meantime, if you would like a copy of the government's extraction from any of the electronic devices on the attached list, please place an "X" in the cell next to the device(s) and return the spreadsheet to me. Extractions for computers will be E01 files that are not readily viewable without forensic software. For mobile devices, we will generally provide a Cellebrite reader report which is an executable file and will open on any Windows machine. I will contact the FBI to determine the location of any requested device(s) and to obtain a recommendation for the size and type of hard drive that will be required. I will then provide you a name and address where you can send (or have a vendor send) a hard drive to have the images loaded. The FBI will return your hard drive directly to the address you specify. Accordingly, please ensure that the hard drive is clearly labeled with the defendant's name and case number as well as a point of contact to receive the drive including, name, firm, address, and telephone number.

Generally, depending on the location and number of devices at issue, the government estimates that it could take approximately thirty days to complete this process.

Please let us know if there are additional seized accounts or devices that you seek because they belong to your client. Finally, if you would like to inspect any of the physical evidence seized in this case, please let me know.

Sincerely,

s/ Christopher K. Veatch
CHRISTOPHER K. VEATCH
Assistant United States Attorney

Enclosure(s)

Collected On	Barcode	Item Number	Case UCFN	Acquisition Event	Description	Holding Office	Evidence Type	Requested by Defense
2021-03-23	E6449078	1B10	2660-PD-3386044			PORTLAND	CART	
2021-03-23	E6449079	1B9	2660-PD-3386044			PORTLAND	GENERAL	
2021-03-23	E6449080	1B8	2660-PD-3386044			PORTLAND	CART	
2021-03-23	E6449081	1B7	2660-PD-3386044			PORTLAND	CART	
2021-03-23	E6449082	1B6	2660-PD-3386044			PORTLAND	CART	
2021-03-23	E6449074	1B5	2660-PD-3386044			PORTLAND	GENERAL	
2021-03-23	E6449075	1B4	2660-PD-3386044			PORTLAND	GENERAL	
2021-03-23	E6449076	1B3	2660-PD-3386044			PORTLAND	CART	
2021-03-23	E6449077	1B2	2660-PD-3386044			PORTLAND	GENERAL	
2021-03-23	E6449083	1B1	2660-PD-3386044			PORTLAND	GENERAL	
2021-03-23	E6566273	1D1	2660-PD-3386044			PORTLAND	CUSTODIAL_ELSUR_EVIDENCE	



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

*Judiciary Center
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July 12, 2021

Michelle M. Sweet, Esq.
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Washington, D.C. 20005

Re: *United States v. Jonathan Peter Klein & Matthew Leland Klein*
Case No. 21-CR-237

Dear Counsel:

I have uploaded to USAfx an additional batch of discovery consisting of Sensitive and Highly Sensitive items. The file names for these items should reflect whether the information is considered Sensitive or Highly Sensitive. In addition, each of the .pdf files have headers/footers identifying the item's classification.

The following Sensitive items are being disclosed in raw form and, as such, do not contain classification headers/footers:

- 266O-PD-3386048_0000039_1A0000029_0000002 (SENSITIVE).html
- 266O-PD-3386048_0000001_1A0000001_0000002 (SENSITIVE).jpg
- 266O-PD-3386048_0000066_1A0000051_0000003 (SENSITIVE).jpg
- 266O-PD-3386048_0000059_1A0000049_0000003 (SENSITIVE).csv
- 266O-PD-3386048_0000059_1A0000050_0000003 (SENSITIVE).csv
- 266O-PD-3386048_0000079_1A0000052_0000002 (SENSITIVE).csv
- 266O-PD-3386048_0000079_1A0000052_0000003 (SENSITIVE).csv
- 266O-PD-3386048_0000079_1A0000052_0000006 (SENSITIVE).xlsx
- 266O-PD-3386048_0000079_1A0000052_0000007 (SENSITIVE).xlsx
- 266O-PD-3386048_0000057_Import (SENSITIVE).docx
- 266O-PD-3386048_0000018_1A0000016_0000002 (SENSITIVE).zip
- 266O-PD-3386048_0000039_1A0000029_0000001 (SENSITIVE).zip
- 266O-PD-3386048_0000039_1A0000029_0000003 (SENSITIVE).zip

- 266O-PD-3386048-GJ_0000005_1A0000004_0000001 (SENSITIVE).zip
- 266O-PD-3386048-GJ_0000009_1A0000008_0000006 (SENSITIVE).zip
- 266O-PD-3386048_0000063_1A0006218_0000001 (SENSITIVE).png

Provided with this letter is an index of the items the government has tendered in discovery to date.

As always, please let me know if you have any questions or issues accessing any of the files. Please also let me know if there are items that have not yet been produced that you would like prioritized as the formal discovery productions are prepared.

Sincerely,

s/ Christopher K. Veatch
CHRISTOPHER K. VEATCH
Assistant United States Attorney

Attachment

Classification	Document Date	Title	Description	File Name	Produced
Sensitive	2/5/2021			2660-PD-3386048_0000001_1A0000001_0000001 (SENSITIVE).pdf	7/12/2021
Sensitive	2/5/2021			2660-PD-3386048_0000001_1A0000001_0000002 (SENSITIVE).jpg	7/12/2021
Sensitive	2/5/2021			2660-PD-3386048_0000001_1A0000001_0000003 (SENSITIVE).pdf	7/12/2021
Sensitive	2/5/2021			2660-PD-3386048_0000002 (SENSITIVE).pdf	7/12/2021
Sensitive	2/5/2021			2660-PD-3386048_0000002_1A0010958_0000001 (SENSITIVE).pdf	7/12/2021
Sensitive	2/5/2021			2660-PD-3386048_0000002_1A0010959_0000001 (SENSITIVE).pdf	7/12/2021
Sensitive	2/9/2021			2660-PD-3386048_0000004 (SENSITIVE).pdf	7/12/2021
Sensitive	2/9/2021			2660-PD-3386048_0000004_Import (SENSITIVE).pdf	7/12/2021
Sensitive	2/9/2021			2660-PD-3386048_0000005_Import (SENSITIVE).pdf	7/12/2021
Sensitive	2/9/2021			2660-PD-3386048_0000006_Import (SENSITIVE).pdf	7/12/2021
Sensitive	2/9/2021			2660-PD-3386048_0000007 (SENSITIVE).pdf	7/12/2021
Sensitive	2/9/2021			2660-PD-3386048_0000007_1A0000003_0000002 (SENSITIVE).pdf	7/12/2021
Sensitive	2/26/2021			2660-PD-3386048_0000010 (SENSITIVE).pdf	7/12/2021
Sensitive	2/26/2021			2660-PD-3386048_0000010_1A0000005_0000001 (SENSITIVE).pdf	7/12/2021
Sensitive	2/26/2021			2660-PD-3386048_0000010_Import (SENSITIVE).pdf	7/12/2021
Sensitive	3/3/2021			2660-PD-3386048_0000014 (SENSITIVE).pdf	7/12/2021
Sensitive	3/3/2021			2660-PD-3386048_0000014_1A0000011_0000001 (SENSITIVE).pdf	7/12/2021
Sensitive	3/3/2021			2660-PD-3386048_0000014_Import (SENSITIVE).pdf	7/12/2021
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Sensitive	3/3/2021			2660-PD-3386048_0000015_1A0000012_0000002 (SENSITIVE).pdf	7/12/2021
Sensitive	3/11/2021			2660-PD-3386048_0000018 (SENSITIVE).pdf	7/12/2021
Sensitive	3/11/2021			2660-PD-3386048_0000018_1A0000016_0000002 (SENSITIVE).zip	7/12/2021
Sensitive	3/18/2021			2660-PD-3386048_0000022 (SENSITIVE).pdf	7/12/2021
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Sensitive	3/25/2021			2660-PD-3386048_0000026 (SENSITIVE).pdf	7/12/2021
Sensitive	3/25/2021			2660-PD-3386048_0000026_1A0000021_0000001 (SENSITIVE).pdf	7/12/2021
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Sensitive	3/29/2021			2660-PD-3386048_0000028 (SENSITIVE).pdf	7/12/2021
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Sensitive	3/29/2021			2660-PD-3386048_0000029_1A0000024_0000002 (SENSITIVE).pdf	7/12/2021
Sensitive	3/29/2021			2660-PD-3386048_0000029_1A0000024_0000004 (SENSITIVE).pdf	7/12/2021
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Nonsensitive	4/2/2021			2660-PD-3386048_0000036.pdf	5/5/2021
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Nonsensitive	4/5/2021			2660-PD-3386048_0000043_1A0000032_0000006.JPG	5/5/2021

Classification	Document Date	Title	Description	File Name	Produced
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Nonsensitive	4/5/2021			2660-PD-3386048_0000043_1A0000032_0000011.jpg	5/5/2021
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Nonsensitive	4/5/2021			2660-PD-3386048_0000044_1A0000033_0000005.jpg	5/5/2021
Nonsensitive	4/5/2021			2660-PD-3386048_0000044_1A0000033_0000006.jpg	5/5/2021
Sensitive	4/5/2021			2660-PD-3386048_0000044_1A0000033_0000007 (SENSITIVE).pdf	7/12/2021
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Sensitive	4/6/2021			2660-PD-3386048_0000047 (SENSITIVE).pdf	7/12/2021
Sensitive	4/6/2021			2660-PD-3386048_0000047_1A0000036_0000001 (SENSITIVE).pdf	7/12/2021
Sensitive	4/6/2021			2660-PD-3386048_0000047_1A0000036_0000002 (SENSITIVE).pdf	7/12/2021
Sensitive	4/6/2021			2660-PD-3386048_0000047_1A0000036_0000003 (SENSITIVE).pdf	7/12/2021
Highly Sensitive	4/7/2021			2660-PD-3386048_0000048(HIGHLY SENSITIVE).pdf	7/12/2021
Highly Sensitive	4/7/2021			2660-PD-3386048_0000048_1A0000037_0000001_PHYSICAL(HIGHLY SENSITIVE).pdf	7/12/2021
Highly Sensitive	4/7/2021			2660-PD-3386048_0000048_1A0000038_0000001_PHYSICAL(HIGHLY SENSITIVE).pdf	7/12/2021
Highly Sensitive	4/7/2021			2660-PD-3386048_0000048_1A0000038_0000002(HIGHLY SENSITIVE).pdf	7/12/2021

Classification	Document Date	Title	Description	File Name	Produced
Highly Sensitive	4/7/2021			2660-PD-3386048_0000049(HIGHLY SENSITIVE).pdf	7/12/2021
Highly Sensitive	4/7/2021			2660-PD-3386048_0000049_1A0000039_0000001_PHYSICAL(HIGHLY SENSITIVE).pdf	7/12/2021
Highly Sensitive	4/7/2021			2660-PD-3386048_0000049_1A0000040_0000001(HIGHLY SENSITIVE).pdf	7/12/2021
Highly Sensitive	4/7/2021			2660-PD-3386048_0000049_1A0000040_0000002_PHYSICAL(HIGHLY SENSITIVE).pdf	7/12/2021
Highly Sensitive	4/7/2021			2660-PD-3386048_0000050(HIGHLY SENSITIVE).pdf	7/12/2021
Highly Sensitive	4/7/2021			2660-PD-3386048_0000050_1A0000041_0000001_PHYSICAL(HIGHLY SENSITIVE).pdf	7/12/2021
Highly Sensitive	4/7/2021			2660-PD-3386048_0000050_1A0000042_0000001_PHYSICAL(HIGHLY SENSITIVE).pdf	7/12/2021
Highly Sensitive	4/7/2021			2660-PD-3386048_0000050_1A0000042_0000002(HIGHLY SENSITIVE).pdf	7/12/2021
Sensitive	4/7/2021			2660-PD-3386048_0000051 (SENSITIVE).pdf	7/12/2021
Nonsensitive	4/7/2021			2660-PD-3386048_0000051_1A0000043_0000001_PHYSICAL.pdf	5/5/2021
Sensitive	4/7/2021			2660-PD-3386048_0000052 (SENSITIVE).pdf	7/12/2021
Nonsensitive	4/7/2021			2660-PD-3386048_0000052_1A0000044_0000001_PHYSICAL.pdf	5/5/2021
Nonsensitive	4/7/2021			2660-PD-3386048_0000053.pdf	5/5/2021
Nonsensitive	4/7/2021			2660-PD-3386048_0000053_Import.rtf	5/5/2021

Classification	Document Date	Title	Description	File Name	Produced
Nonsensitive	4/7/2021			2660-PD-3386048_0000054.pdf	5/5/2021
Nonsensitive	4/7/2021			2660-PD-3386048_0000054_1A0000045_0000001.png	5/5/2021
Nonsensitive	4/7/2021			2660-PD-3386048_0000054_Import.rtf	5/5/2021
Nonsensitive	4/7/2021				5/5/2021
Nonsensitive	4/7/2021			2660-PD-3386048_0000055.pdf	
Nonsensitive	4/7/2021			2660-PD-3386048_0000055_1A0000046_0000001_PHYSICAL.pdf	5/5/2021
Nonsensitive	4/7/2021			2660-PD-3386048_0000055_1A0000047_0000001.pdf	5/5/2021
Nonsensitive	4/7/2021			2660-PD-3386048_0000056.pdf	5/5/2021
Sensitive	4/9/2021			2660-PD-3386048_0000057 (SENSITIVE).pdf	7/12/2021
Sensitive	4/9/2021			2660-PD-3386048_0000057_Import (SENSITIVE).docx	7/12/2021
Nonsensitive	4/9/2021			2660-PD-3386048_0000058.pdf	5/5/2021
Sensitive	4/9/2021			2660-PD-3386048_0000058_1A0000048_0000001 (SENSITIVE).pdf	7/12/2021
Nonsensitive	4/9/2021			2660-PD-3386048_0000058_1A0000048_0000002.pdf	5/5/2021
Nonsensitive	4/9/2021			2660-PD-3386048_0000058_Import.pdf	5/5/2021
Sensitive	4/9/2021			2660-PD-3386048_0000059 (SENSITIVE).pdf	7/12/2021
Sensitive	4/9/2021			2660-PD-3386048_0000059_1A0000049_0000001_PHYSICAL (SENSITIVE).pdf	7/12/2021
Sensitive	4/9/2021			2660-PD-3386048_0000059_1A0000049_0000002 (SENSITIVE).pdf	7/12/2021
Sensitive	4/9/2021			2660-PD-3386048_0000059_1A0000049_0000003 (SENSITIVE).csv	7/12/2021
Sensitive	4/9/2021				
Sensitive	4/9/2021			2660-PD-3386048_0000059_1A0000049_0000004 (SENSITIVE).pdf	7/12/2021
Sensitive	4/9/2021			2660-PD-3386048_0000059_1A0000050_0000001 (SENSITIVE).pdf	7/12/2021
Sensitive	4/9/2021			2660-PD-3386048_0000059_1A0000050_0000002 (SENSITIVE).pdf	7/12/2021
Sensitive	4/9/2021			2660-PD-3386048_0000059_1A0000050_0000003 (SENSITIVE).csv	7/12/2021
Sensitive	4/14/2021			2660-PD-3386048_0000062 (SENSITIVE).pdf	7/12/2021
Sensitive	4/22/2021			2660-PD-3386048_0000063 (SENSITIVE).pdf	7/12/2021

Classification	Document Date	Title	Description	File Name	Produced
Sensitive	4/22/2021			2660-PD-3386048_0000063_1A0006218_0000001 (SENSITIVE).png	7/12/2021
Sensitive	4/22/2021			2660-PD-3386048_0000063_1A0006218_0000002 (SENSITIVE).pdf	7/12/2021
Sensitive	4/22/2021			2660-PD-3386048_0000063_1A0006218_0000003 (SENSITIVE).pdf	7/12/2021
Sensitive	4/22/2021			2660-PD-3386048_0000064 (SENSITIVE).pdf	7/12/2021
Sensitive	4/22/2021			2660-PD-3386048_0000065 (SENSITIVE).pdf	7/12/2021
Sensitive	4/22/2021			2660-PD-3386048_0000066 (SENSITIVE).pdf	7/12/2021
Sensitive	4/22/2021			2660-PD-3386048_0000066_1A0000051_0000001 (SENSITIVE).pdf	7/12/2021
Sensitive	4/22/2021			2660-PD-3386048_0000066_1A0000051_0000002 (SENSITIVE).pdf	7/12/2021
Sensitive	4/22/2021			2660-PD-3386048_0000066_1A0000051_0000003 (SENSITIVE).jpg	7/12/2021
Sensitive	4/22/2021			2660-PD-3386048_0000066_Import (SENSITIVE).pdf	7/12/2021
Sensitive	4/23/2021			2660-PD-3386048_0000067_1A0000001_0000001 (SENSITIVE).pdf	7/12/2021
Sensitive	4/23/2021			2660-PD-3386048_0000067_1A0000001_0000002 (SENSITIVE).pdf	7/12/2021
Nonsensitive	4/23/2021			2660-PD-3386048_0000067_1A0000001_0000003.pdf	5/5/2021
Nonsensitive	4/23/2021			2660-PD-3386048_0000067_1A0000001_0000004.jpg	5/5/2021
Nonsensitive	4/23/2021			2660-PD-3386048_0000067_1A0000001_0000005.jpeg	5/5/2021
Sensitive	4/23/2021			2660-PD-3386048_0000068 (SENSITIVE).pdf	7/12/2021
Sensitive	4/23/2021			2660-PD-3386048_0000068_1A0000002_0000001 (SENSITIVE).pdf	7/12/2021
Nonsensitive	4/23/2021			2660-PD-3386048_0000068_1A0000002_0000002.pdf	5/5/2021

Classification	Document Date	Title	Description	File Name	Produced
Sensitive	4/23/2021			2660-PD-3386048_0000070 (SENSITIVE).pdf	7/12/2021
Sensitive	4/23/2021			2660-PD-3386048_0000070_1A0000003_0000001 (SENSITIVE).pdf	7/12/2021
Nonsensitive	4/23/2021			2660-PD-3386048_0000070_1A0000003_0000002.pdf	5/5/2021
Sensitive	4/23/2021			2660-PD-3386048_0000070_1A0000003_0000003 (SENSITIVE).pdf	7/12/2021
Nonsensitive	4/23/2021			2660-PD-3386048_0000071.pdf	5/5/2021
Sensitive	4/23/2021			2660-PD-3386048_0000072 (SENSITIVE).pdf	7/12/2021
Nonsensitive	4/23/2021			2660-PD-3386048_0000072_1A0000004_0000001.pdf	5/5/2021
Nonsensitive	4/23/2021			2660-PD-3386048_0000072_1A0000005_0000001_PHYSICAL.pdf	5/5/2021
Sensitive	4/23/2021			2660-PD-3386048_0000073 (SENSITIVE).pdf	7/12/2021
Sensitive	4/23/2021			2660-PD-3386048_0000073_1A0000006_0000001 (SENSITIVE).pdf	7/12/2021
Nonsensitive	4/23/2021			2660-PD-3386048_0000074.pdf	5/5/2021
Sensitive	4/23/2021			2660-PD-3386048_0000075 (SENSITIVE).pdf	7/12/2021
Nonsensitive	4/23/2021			2660-PD-3386048_0000075_1A0000008_0000001_PHYSICAL.pdf	5/5/2021
Nonsensitive	4/23/2021			2660-PD-3386048_0000076.pdf	5/5/2021
Nonsensitive	4/23/2021			2660-PD-3386048_0000076_1A0000009_0000001_PHYSICAL.pdf	5/5/2021
Nonsensitive	4/23/2021			2660-PD-3386048_0000077.pdf	5/5/2021
Nonsensitive	4/23/2021			2660-PD-3386048_0000077_1A0000010_0000001_PHYSICAL.pdf	5/5/2021
Sensitive	4/23/2021			2660-PD-3386048_0000079 (SENSITIVE).pdf	7/12/2021

Classification	Document Date	Title	Description	File Name	Produced
Sensitive	4/23/2021			2660-PD-3386048_0000079_1A0000052_0000001_PHYSICAL (SENSITIVE).pdf	7/12/2021
Sensitive	4/23/2021			2660-PD-3386048_0000079_1A0000052_0000002 (SENSITIVE).csv	7/12/2021
Sensitive	4/23/2021			2660-PD-3386048_0000079_1A0000052_0000003 (SENSITIVE).csv	7/12/2021
Sensitive	4/23/2021			2660-PD-3386048_0000079_1A0000052_0000004 (SENSITIVE).pdf	7/12/2021
Sensitive	4/23/2021			2660-PD-3386048_0000079_1A0000052_0000005 (SENSITIVE).pdf	7/12/2021
Sensitive	4/23/2021			2660-PD-3386048_0000079_1A0000052_0000006 (SENSITIVE).xlsx	7/12/2021
Sensitive	4/23/2021			2660-PD-3386048_0000079_1A0000052_0000007 (SENSITIVE).xlsx	7/12/2021
Sensitive Nonsensitive	4/23/2021			2660-PD-3386048_0000079_1A0000052_0000008_PHYSICAL (SENSITIVE).pdf	7/12/2021
	2/17/2021			2660-PD-3386048-GJ_0000001.pdf	5/5/2021
Sensitive	2/17/2021			2660-PD-3386048-GJ_0000001_1A0000001_0000001 (SENSITIVE).pdf	7/12/2021
Nonsensitive	2/17/2021			2660-PD-3386048-GJ_0000001_1A0000001_0000002.pdf	5/5/2021
Nonsensitive	2/17/2021			2660-PD-3386048-GJ_0000001_1A0000001_0000003.pdf	5/5/2021
Nonsensitive	2/17/2021			2660-PD-3386048-GJ_0000002.pdf	5/5/2021
Sensitive Nonsensitive	2/17/2021			2660-PD-3386048-GJ_0000002_1A0000002_0000001 (SENSITIVE).pdf	7/12/2021
	2/17/2021			2660-PD-3386048-GJ_0000002_1A0000002_0000002.pdf	5/5/2021
Nonsensitive	2/17/2021			2660-PD-3386048-GJ_0000002_1A0000002_0000003.pdf	5/5/2021
Nonsensitive	2/17/2021			2660-PD-3386048-GJ_0000003.pdf	5/5/2021
Nonsensitive	2/17/2021			2660-PD-3386048-GJ_0000003_1A0000003_0000001.pdf	5/5/2021
Nonsensitive	2/17/2021			2660-PD-3386048-GJ_0000003_1A0000003_0000002.pdf	5/5/2021
Nonsensitive	2/17/2021			2660-PD-3386048-GJ_0000003_1A0000003_0000003.jpeg	5/5/2021

Classification	Document Date	Title	Description	File Name	Produced
Nonsensitive	2/17/2021			2660-PD-3386048-GJ_0000004.pdf	5/5/2021
Sensitive	2/17/2021			2660-PD-3386048-GJ_0000004_Import (SENSITIVE).pdf	7/12/2021
Sensitive	2/18/2021			2660-PD-3386048-GJ_0000005 (SENSITIVE).pdf	7/12/2021
Sensitive	2/18/2021			2660-PD-3386048-GJ_0000005_1A0000004_0000001 (SENSITIVE).zip	7/12/2021
Nonsensitive	2/18/2021			2660-PD-3386048-GJ_0000005_1A0000004_0000002.pdf	5/5/2021
Sensitive	2/18/2021			2660-PD-3386048-GJ_0000006 (SENSITIVE).pdf	7/12/2021
Sensitive	2/18/2021			2660-PD-3386048-GJ_0000006_1A0000005_0000001 (SENSITIVE).pdf	7/12/2021
Sensitive	2/18/2021			2660-PD-3386048-GJ_0000006_1A0000005_0000002 (SENSITIVE).pdf	7/12/2021
Nonsensitive	2/18/2021			2660-PD-3386048-GJ_0000006_1A0000005_0000003.pdf	5/5/2021
Nonsensitive	2/19/2021			2660-PD-3386048-GJ_0000007.pdf	5/5/2021
Sensitive	2/19/2021			2660-PD-3386048-GJ_0000007_1A0000006_0000001 (SENSITIVE).pdf	7/12/2021
Nonsensitive	2/19/2021			2660-PD-3386048-GJ_0000007_1A0000006_0000002.pdf	5/5/2021
Nonsensitive	2/19/2021			2660-PD-3386048-GJ_0000007_1A0000006_0000003.pdf	5/5/2021
Nonsensitive	2/19/2021			2660-PD-3386048-GJ_0000007_1A0000006_0000004.pdf	5/5/2021
Nonsensitive	2/19/2021			2660-PD-3386048-GJ_0000007_1A0000006_0000005.pdf	5/5/2021
Nonsensitive	2/19/2021			2660-PD-3386048-GJ_0000007_1A0000006_0000006.pdf	5/5/2021
Sensitive	3/29/2021			2660-PD-3386048-GJ_0000008 (SENSITIVE).pdf	7/12/2021
Nonsensitive	3/29/2021			2660-PD-3386048-GJ_0000008_1A0000007_0000001.pdf	5/5/2021
Nonsensitive	3/29/2021			2660-PD-3386048-GJ_0000008_1A0000007_0000002.pdf	5/5/2021
Nonsensitive	3/29/2021			2660-PD-3386048-GJ_0000008_1A0000007_0000003.pdf	5/5/2021
Nonsensitive	3/29/2021			2660-PD-3386048-GJ_0000008_1A0000007_0000004.tif	5/5/2021
Sensitive	3/29/2021			2660-PD-3386048-GJ_0000008_1A0000007_0000005 (SENSITIVE).pdf	7/12/2021
Sensitive	4/2/2021			2660-PD-3386048-GJ_0000009 (SENSITIVE).pdf	7/12/2021
Sensitive	4/2/2021			2660-PD-3386048-GJ_0000009_1A0000008_0000001 (SENSITIVE).pdf	7/12/2021

Classification	Document Date	Title	Description	File Name	Produced
Nonsensitive	4/2/2021			2660-PD-3386048-GJ_0000009_1A0000008_0000002.pdf	5/5/2021
Nonsensitive	4/2/2021			2660-PD-3386048-GJ_0000009_1A0000008_0000003.pdf	5/5/2021
Sensitive	4/2/2021			2660-PD-3386048-GJ_0000009_1A0000008_0000004 (SENSITIVE).pdf	7/12/2021
Sensitive	4/2/2021			2660-PD-3386048-GJ_0000009_1A0000008_0000005 (SENSITIVE).pdf	7/12/2021
Sensitive	4/2/2021			2660-PD-3386048-GJ_0000009_1A0000008_0000006 (SENSITIVE).zip	7/12/2021
Nonsensitive	2/22/2021			2660-PD-3386048-PEN_0000001.pdf	5/5/2021
Sensitive	2/23/2021			2660-PD-3386048-PEN_0000002 (SENSITIVE).pdf	7/12/2021



U.S. Department of Justice

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July 20, 2021

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Re: *United States v. Jonathan Peter Klein & Matthew Leland Klein*
Case No. 21-CR-237

Dear Counsel:

I have uploaded to USAfx the following U.S. Capitol CCTV videos, which are contained within five .zip files named **7.20.2021 - USCP CCTV - HIGHLY SENSITIVE ITEMS -1.zip** through **7.20.2021 - USCP CCTV - HIGHLY SENSITIVE ITEMS -5.zip**:

- [REDACTED] Senate Wing Door near S139-2021-01-06_14h11min00s000ms.mp4
- [REDACTED] Senate Wing Door near S139-2021-01-06_14h35min00s000ms.asf
- [REDACTED] North Door Appt. Desk-2021-01-06_14h10min00s000ms.asf
- [REDACTED] North Door Appt. Desk-2021-01-06_15h10min00s000ms.asf
- [REDACTED] North Door Appt. Desk-2021-01-06_16h09min00s000ms.asf
- [REDACTED] Brumidi Corridor-2021-01-06_14h10min00s000ms.asf
- [REDACTED] House Wing Door-2021-01-06_14h25min00s000ms.mp4
- [REDACTED] Crypt East-2021-01-06_14h18min00s000ms.mp4
- [REDACTED] Crypt North-2021-01-06_14h18min00s000ms.mp4
- [REDACTED] Crypt South-2021-01-06_14h18min00s000ms.mp4
- [REDACTED] Rotunda South-2021-01-06_14h17min00s000ms.mp4
- [REDACTED] Rotunda North-2021-01-06_14h17min00s000ms.mp4

Each of these videos are considered Highly Sensitive for purposes of the Protective Order.

As always, please let me know if you have any questions or issues accessing any of the files. Please also let me know if there are items that have not yet been produced that you would like prioritized as the formal discovery productions are prepared.

Sincerely,

s/ Christopher K. Veatch
CHRISTOPHER K. VEATCH
Assistant United States Attorney