

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	:	
UNITED STATES OF AMERICA	:	No.: 21-CR-243 (APM)
	:	
v.	:	
	:	
JOHN LOLOS,	:	
Defendant.	:	
_____	:	

**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 23, 2021, discovery letter in this case memorializing discovery produced on June 23, 2021 , which is hereby served as an attachment via ECF on counsel for the Defendants.

Respectfully submitted,

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

By: /s/ Anthony L. Franks  
ANTHONY L. FRANKS  
Missouri Bar No. 50217MO  
Assistant United States Attorney  
Detailee – Federal Major Crimes  
United States Attorney’s Office  
for the District of Columbia  
Telephone No . (314) 539-3995  
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**CERTIFICATE OF SERVICE**

On this 24<sup>th</sup> 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/  
Anthony L. Franks  
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*

**BY EMAIL**

June 23, 2021

**Edward B. MacMahon, Jr.**  
EDWARD B. MACMAHON, JR., PLC  
P.O. Box 25  
107 East Washington Street  
Middleburg, VA 20118

Re: United States v. John Lolos, 1:21-cr-00243-APM-1

Dear Mr. MacMahon:

Today, the Government supplemented its prior discovery productions by uploading the following to your USAfx files:

1. FBI 302 dated June 17, 2021.

We will continue to supplement the discovery 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 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/ Anthony L. Franks  
Anthony L. Franks  
Assistant United States Attorney