

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA	:	No.: 21-CR-240-BAH
	:	
v.	:	
	:	
LAWRENCE EARL STACKHOUSE,	:	
	:	
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 July 19, 2021 discovery letter in this case, in reference to discovery produced between April and July, 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  
United States Attorney’s Office  
for the District of Columbia  
Telephone No . (956) 754-0946  
April.Perez@usdoj.gov

CERTIFICATE OF SERVICE

On this 19th day of July, 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*

July 19, 2021

**Ubong E. Akpan**

FEDERAL PUBLIC DEFENDER'S OFFICE FOR THE DISTRICT OF COLUMBIA  
625 Indiana Ave., NW  
Washington, DC 20004  
via email: ubong\_akpan@fd.org

Re: *United States v. Lawrence Earl Stackhouse*  
Case No. 1:21-cr-00240-BAH

Dear Ms. Akpan:

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. 134609613525, contained within a folder entitled Stackhouse 21CR240 Discovery. Preliminary discovery was originally uploaded to USAfx in this case on April 2, 2021, and has been supplemented on May 20, 2021, June 20, 2021, and July 19, 2021.

The following documents have been shared via USAfx from April through June 2021:

<u>Serial No.</u>	<u>Document/Video/Photo</u>
1	Case Opening Communication
2	Opening EC – Stackhouse
2	Larry Stackhouse Face Search
2	Larry Stackhouse Telegram Profile Picture
2	Stackhouse CCTV Still Shot
3	Stackhouse Import Form
3	Stackhouse Incident Summary
3	Stackhouse DL Photo
3	Stackhouse Facebook Photo
3	Larry Stackhouse Photo

3	Larry Stackhouse Twitter Photo
3	[Redacted] Photo
4	Interview of [Redacted]
4	Interview Notes of [Redacted]
5	Status Update on Stackhouse from [Redacted]
8	Identification of Stackhouse Telegram
8	Larry Stackhouse Telegram Profile Picture
8	Stackhouse CCTV_2
8	Larry Stackhouse Face Search
11	Signed 21mj270 Arrest Warrant
12	Stackhouse Search Warrant
13	Stackhouse Vehicle PDF
15	Interview of Stackhouse Part 1
16	Interview of Stackhouse Part 2
17	FD-302 Interview of Stackhouse
17	Stackhouse Interview Notes
17	Stackhouse Phone
17	Stackhouse Signed <i>Miranda</i> Waiver
17	Stackhouse Interview Notes
17	FD-26 Stackhouse Vehicle
18	Consent Search Report
18	Stackhouse Phone FD-941
20	FD-302
20	Cover Sheet (Physical Attachment)
21	Evidence Recovery Log – Residence
21	Search Warrant – Residence
21	FD597 – Residence
21	Disc of Search Photographs (Cover Sheet)
21	Residence Sketch
22	Residence Search Key
23	FD-302 Execution of Search Warrant
23	21-2041 Search Warrant
23	21-2041 Application
24	FD-302 Evidence Transport
25	FD-302 Evidence Transport 2
2 FISUR	Physical Surveillance at Residence
2 FISUR	Residence Photograph
3 FISUR	Physical Surveillance at Residence
3 FISUR	Photograph
2 GJ	GJ Subpoena Service and Returns – AT&T
3 GJ	GJ Subpoena Service – AT&T
5 GJ	GJ Subpoena Service and Returns – Twitter
5 GJ	Stackhouse Twitter

5 GJ	Stackhouse Twitter
5 GJ	Stackhouse Twitter

The following documents have been shared via USAfx in July 2021:

<b>Serial No.</b>	<b>Capitol CCTV Footage (HIGHLY SENSITIVE)</b>
N/A	Capitol CCTV Video (8:56)(HIGHLY SENSITIVE)
N/A	Capitol CCTV Video (15:08)(HIGHLY SENSITIVE)
N/A	Capitol CCTV Video (11:32)(HIGHLY SENSITIVE)
N/A	Capitol CCTV Video (08:55)(HIGHLY SENSITIVE)

Additional discovery will continue to be shared in the coming weeks, including Capitol CCTV footage. A large portion of the discovery will be duplicative of what has already been shared via preliminary discovery. This additional discovery, however, will be bate stamped and provided all at once.

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