

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

**UNITED STATES OF AMERICA**

**v.**

**MARK AUNGST,  
TAMMY BRONSBURG,**

**Defendants.**

:  
:  
:  
:  
:  
:  
:  
:

**Case No. 21-cr-144 (RBW)**

**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 August 3, 2021 discovery letter in this case, which was served as an attachment via ECF on counsel for the Defendants.

Respectfully submitted,

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

By:

/s/

AMANDA FRETTO  
D.C. Bar No. 1018284  
Assistant United States Attorney  
U.S. Attorney's Office for the District of Columbia  
555 4th Street, N.W.  
Washington, DC 20530  
(202) 252-7268  
Amanda.Lingwood@usdoj.gov

**CERTIFICATE OF SERVICE**

On this 3rd day of August, 2021, a copy of the foregoing was served on counsel of record for the defendants via the Court's Electronic Filing System.

/s/

Amanda Fretto  
Assistant United States Attorney



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*

August 3, 2021

**BY EMAIL**

David Bos  
David\_bos@fd.org  
*Counsel for Tammy Bronsborg*

William Welch III  
wlw@wwelchattorney.com  
*Counsel for Mark Aungst*

Re: *United States v. Mark Aungst & Tammy Bronsborg*, 21-cr-144  
Discovery Production 1

Dear Counsel:

In response to your request for discovery, and in the hopes of exploring a possible resolution of this matter in the future, we write to memorialize the discovery that we provided for download off of USAFx. This material is subject to the terms of the Protective Order issued in this case. **Materials in this production are designated Sensitive and Highly Sensitive under the Protective Order.**

**The following materials were provided via email and USAfx on August 3, 2021:**

- Viewing Letter for counsel to tour the U.S. Capitol;
- U.S. Capitol Floor Plan – First Floor;
- U.S. Capitol Floor Plan – Second Floor;
- U.S. Capitol Floor Plan – Third Floor.

**The following materials were provided via USAFX on August 3, 2021:**

- In subfolder labeled “No Sensitivity Designation”:
  - Image labeled “Bus ride” (1);
  - In subfolder labeled “Arrest Warrant Documents”:
    - Aungst Warrant;

- Aungst Bronsburg Affidavit;
- Aungst Bronsburg Complaint;
- Aungst Bronsburg Complaint Redacted;
- Aungst Bronsburg Order to Seal;
- Bronsburg Warrant;
- In subfolder – and designated under protected order as – “**HIGHLY SENSITIVE**”:
  - USCP CCTV video, file name beginning with “0102 USCS 01 Senate Wing Door”;
  - USCP CCT video, file name beginning with “0122 USCS 01 West Stairs”;
  - PDF labeled “USCP CCTV Video screenshots”;
- In subfolder – and designated under the protective order as – “**SENSITIVE**”:
  - Redacted Interview 1 (3 pages);
  - Redacted Interview 2 (2 pages);
  - Redacted Interview 3 (3 pages);
  - Redacted Interview 4 (3 pages);
  - Correction (to Interview 4) (1 page);
  - Sheetz Correction (1 page).

To the extent you have not already done so, please download all of these files as soon as possible from USAfx, as it is not a storage medium; rather, it is a file transfer method. The folder and its contents will expire within 60 days. Please advise me immediately if you have difficulty downloading the discovery folder. This early discovery is not a complete production, but rather preliminary discovery. We anticipate producing more fulsome discovery in the future. 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.

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.

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.

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

CHANNING D. PHILLIPS  
ACTING UNITED STATES ATTORNEY  
For the District of Columbia

By: \_\_\_\_\_ /s/  
AMANDA FRETTO  
D.C. Bar No. 1018284  
Assistant United States Attorney  
555 4th Street, N.W.  
Washington, D.C. 20530  
(202) 252-7268  
[Amanda.Lingwood@usdoj.gov](mailto:Amanda.Lingwood@usdoj.gov)