

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

UNITED STATES OF AMERICA

v.

**JONATHAN PETER ALLEN KLEIN and
MATTHEW LELAND KLEIN,**

Defendants.

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Case No. 21-CR-237 (RDM)

**GOVERNMENT'S THIRD NOTICE
REGARDING DISCOVERY CORRESPONDENCE**

The United States of America, by and through undersigned counsel, respectfully submits this third notice of its correspondence to defense counsel regarding discovery productions to date. Filed as attachments to this notice is correspondence to counsel containing information regarding the items tendered. The correspondence is identified in the following chart, which includes the number of the attachment, as well as the date and recipient of the correspondence.¹

| Attachment | Letter Date | Recipient(s) |
|-------------------|--------------------|-------------------------------------|
| 1 | September 17, 2021 | Counsel for Both Defendants |
| 2 | September 21, 2021 | Counsel for Both Defendants |
| 3 | September 23, 2021 | Counsel for Defendant Matthew Klein |
| 4 | September 27, 2021 | Counsel for Both Defendants |

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
219 S. Dearborn Street, 5th Floor

¹ A portion of some of the correspondence has been redacted. Unredacted versions of such correspondence was received by counsel and is available for the Court's inspection upon request.

Chicago, Illinois 60604
christopher.veatch@usdoj.gov
(312) 886-3389



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*

September 17, 2021

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

Eugene Gorokhov, Esq.
Burnham & Gorokhov, PLLC
1424 K Street NW, Suite 500
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 the Non-Sensitive, Sensitive, and Highly Sensitive items identified in Attachment A to this letter. Please note, the government reserves the right to modify these designations to the extent an item's sensitivity was not properly categorized in this preliminary discovery. Please let us know if there are any items for which you would like a designation to be reviewed or reconsidered.

Sincerely,

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

| Protective Order Designation | File Name |
|------------------------------|--|
| NON-SENSITIVE | 2660-PD-3386048_0000082.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000082_1A0000055_0000001.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000082_1A0000055_0000002.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000084.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000084_1A0000058_0000001.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000085.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000086.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000088.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000088_1A0000060_0000001.JPG |
| NON-SENSITIVE | 2660-PD-3386048_0000088_1A0000060_0000002.JPG |
| NON-SENSITIVE | 2660-PD-3386048_0000088_1A0000060_0000003.jpeg |
| NON-SENSITIVE | 2660-PD-3386048_0000088_1A0000060_0000004.JPG |
| NON-SENSITIVE | 2660-PD-3386048_0000088_1A0000060_0000006.JPG |
| NON-SENSITIVE | 2660-PD-3386048_0000088_1A0000060_0000007.ARW |
| NON-SENSITIVE | 2660-PD-3386048_0000088_1A0000061_0000002.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000090.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000090_1A0000063_0000001.mp4 |
| NON-SENSITIVE | 2660-PD-3386048_0000090_1A0000063_0000002.mp4 |
| NON-SENSITIVE | 2660-PD-3386048_0000090_1A0000063_0000003.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000090_1A0000063_0000004.mp4 |
| NON-SENSITIVE | 2660-PD-3386048_0000090_1A0000063_0000005_PHYSICAL.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000090_1A0000063_0000006_PHYSICAL.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000091.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000091_1A0000064_0000001.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000091_1A0000064_0000002.mp4 |
| NON-SENSITIVE | 2660-PD-3386048_0000091_1A0000064_0000003_PHYSICAL.pdf |
| NON-SENSITIVE | 2660-PD-3386048_0000095_1A0000067_0000002.zip |
| SENSITIVE | 2660-PD-3386048_0000079.pdf |
| SENSITIVE | 2660-PD-3386048_0000079_1A0000052_0000001_PHYSICAL.pdf |
| SENSITIVE | 2660-PD-3386048_0000079_1A0000052_0000002.csv |
| SENSITIVE | 2660-PD-3386048_0000079_1A0000052_0000003.csv |
| SENSITIVE | 2660-PD-3386048_0000079_1A0000052_0000004.pdf |
| SENSITIVE | 2660-PD-3386048_0000079_1A0000052_0000005.pdf |
| SENSITIVE | 2660-PD-3386048_0000079_1A0000052_0000006.xlsx |
| SENSITIVE | 2660-PD-3386048_0000079_1A0000052_0000007.xlsx |
| SENSITIVE | 2660-PD-3386048_0000079_1A0000052_0000008_PHYSICAL.pdf |
| SENSITIVE | 2660-PD-3386048_0000080.pdf |
| SENSITIVE | 2660-PD-3386048_0000080_1A0000053_0000001.pdf |
| SENSITIVE | 2660-PD-3386048_0000083.pdf |
| SENSITIVE | 2660-PD-3386048_0000083_1A0000056_0000001.zip |
| SENSITIVE | 2660-PD-3386048_0000083_1A0000056_0000002.zip |
| SENSITIVE | 2660-PD-3386048_0000083_1A0000056_0000003_PHYSICAL.pdf |
| SENSITIVE | 2660-PD-3386048_0000083_1A0000057_0000001.xlsx |
| SENSITIVE | 2660-PD-3386048_0000085_1A0000059_0000001.pdf |
| SENSITIVE | 2660-PD-3386048_0000085_1A0000059_0000002.pdf |
| SENSITIVE | 2660-PD-3386048_0000085_1A0000059_0000003_PHYSICAL.pdf |
| SENSITIVE | 2660-PD-3386048_0000085_1A0000059_0000004.zip |
| SENSITIVE | 2660-PD-3386048_0000085_1A0000059_0000005.pdf |
| SENSITIVE | 2660-PD-3386048_0000085_1A0000059_0000006.zip |
| SENSITIVE | 2660-PD-3386048_0000085_1A0000059_0000007.pdf |
| SENSITIVE | 2660-PD-3386048_0000085_1A0000059_0000008.pdf |
| SENSITIVE | 2660-PD-3386048_0000092.pdf |
| SENSITIVE | 2660-PD-3386048_0000092_1A0000065_0000001_PHYSICAL.pdf |
| SENSITIVE | 2660-PD-3386048_0000092_1A0000065_0000002.pdf |
| SENSITIVE | 2660-PD-3386048_0000092_1A0000065_0000003.pdf |

| Protective Order Designation | File Name |
|------------------------------|--|
| SENSITIVE | 266O-PD-3386048_0000092_1A0000065_0000004.pdf |
| SENSITIVE | 266O-PD-3386048_0000092_1A0000065_0000005.zip |
| SENSITIVE | 266O-PD-3386048_0000094.pdf |
| SENSITIVE | 266O-PD-3386048_0000094_1A0014950_0000001_Redacted.pdf |
| SENSITIVE | 266O-PD-3386048_0000095_1A0000067_0000001_Redacted.pdf |
| SENSITIVE | 266O-PD-3386048_0000095_Redacted.pdf |
| SENSITIVE | 266O-PD-3386048_0000096.pdf |
| SENSITIVE | 266O-PD-3386048_0000096_1A0000068_0000001.xlsx |
| SENSITIVE | 266O-PD-3386048_0000096_1A0000068_0000002.pdf |
| SENSITIVE | 266O-PD-3386048_0000096_1A0000068_0000003.csv |
| SENSITIVE | 266O-PD-3386048_0000097.pdf |
| SENSITIVE | 266O-PD-3386048_0000097_1A0008450_0000001_Redacted.pdf |
| SENSITIVE | 266O-PD-3386048_0000098.pdf |
| SENSITIVE | 266O-PD-3386048_0000098_1A0008285_0000001_Redacted.pdf |
| HIGHLY SENSITIVE | 266O-PD-3386048_0000089.pdf |
| HIGHLY SENSITIVE | 266O-PD-3386048_0000089_1A0000062_0000001_Redacted.pdf |
| HIGHLY SENSITIVE | 266O-PD-3386048_0000089_1A0000062_0000003_Redacted.pdf |
| HIGHLY SENSITIVE | 266O-PD-3386048_0000099_Redacted.pdf |



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

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555 Fourth St., N.W.
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September 21, 2021

Michelle M. Sweet, Esq.
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1424 K Street NW, Suite 500
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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 an additional batch of discovery consisting of the Non-Sensitive and Sensitive items identified in Attachment A to this letter. The government reserves the right to modify these designations to the extent an item's sensitivity was not properly categorized in this preliminary discovery. Please let me know if there are any items for which you would like a designation to be reviewed or reconsidered.

The referenced materials are contained in a folder entitled [REDACTED]
[REDACTED], which is located at:

- [REDACTED].

Please let me know if you do not receive an invitation to or have any difficulties accessing this folder or would like to discuss any of the materials.

Sincerely,

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

| Protective Order Designation | File Name |
|------------------------------|--|
| SENSITIVE | 266O-PD-3386048_0000012_1A0000008_0000001_Redacted.pdf |
| SENSITIVE | 266O-PD-3386048_0000012_1A0000008_0000002_Redacted.pdf |
| SENSITIVE | 266O-PD-3386048_0000012_1A0000008_0000003_Redacted.pdf |
| SENSITIVE | 266O-PD-3386048_0000012_1A0000008_0000004_Redacted.pdf |
| SENSITIVE | 266O-PD-3386048_0000012_1A0000008_0000005_Redacted.pdf |
| SENSITIVE | 266O-PD-3386048_0000012_Redacted.pdf |
| SENSITIVE | 266O-PD-3386048_0000046.pdf |
| SENSITIVE | 266O-PD-3386048_0000046_1A0000035_0000001.pdf |
| SENSITIVE | 266O-PD-3386048_0000046_Import_Redacted.pdf |
| SENSITIVE | Review of 1B7 & 1B8 (PD-3386044) |
| SENSITIVE | Review of 1B10 (PD-3386044) |
| NON-SENSITIVE | CAPVID_00001_ABQ Raw 31 Minute youtube.com watch v=YONAUesjAY |
| NON-SENSITIVE | CAPVID_00002_ABQ Raw 9 minute youtube.com watch v=oYxKioXhve0 |
| NON-SENSITIVE | CAPVID_00003_ABQ Raw Anatomy of a Riot youtube.com |
| NON-SENSITIVE | CAPVID_00004_ABQ Raw People Storm the Capitol youtube.com |
| NON-SENSITIVE | CAPVID_00005_Banned-Video What REALLY Happen at the Capitol |
| NON-SENSITIVE | CAPVID_00006_BG on the Ground - Trump Supporters Storm US Capitol in DC youtube.com |
| NON-SENSITIVE | CAPVID_00007_Block Video |
| NON-SENSITIVE | CAPVID_00008_BREAKING_ Trump Supporters Breach Barriers and Storm Capitol |
| NON-SENSITIVE | CAPVID_00009_Capitolhunters walking outside capitol twitter.com |
| NON-SENSITIVE | CAPVID_00010_Channel 4 News Proud boys leader will continue to happen youtube.com |
| NON-SENSITIVE | CAPVID_00011_ElijahSchaffer Twitter assault on the barricades |
| NON-SENSITIVE | CAPVID_00012_Hunting Insurrectionists Columbus Door Parler Videos youtube.com |
| NON-SENSITIVE | CAPVID_00013_Hunting Insurrectionists East Columbus Doors 1345 - 1645 youtube.com |
| NON-SENSITIVE | CAPVID_00014_Hunting Insurrectionists Joe Biggs Timeline youtube.com |
| NON-SENSITIVE | CAPVID_00015_Hunting Insurrectionists youtube.com |
| NON-SENSITIVE | CAPVID_00016_Hunting Insurrectionists Terrorist breach the West Barricades youtube.com |
| NON-SENSITIVE | CAPVID_00017_Hunting Insurrectionists Terrorist break into Capitol multiple angles youtube.com |
| NON-SENSITIVE | CAPVID_00018_Insurgence full video seige on capitol youtube.com |
| NON-SENSITIVE | CAPVID_00019_Miami Proudboy - MoSD brief youtube |
| NON-SENSITIVE | CAPVID_00020_Nabert Biggs timeline twitter.com |
| NON-SENSITIVE | CAPVID_00021_Nabert BulgePB twitter.com |
| NON-SENSITIVE | CAPVID_00022_Nigrotime Capitol Riots Raw Footage youtube.com |
| NON-SENSITIVE | CAPVID_00023_Nigrotime The US Capitol Breach as it happened youtube.com |
| NON-SENSITIVE | CAPVID_00024_Nine_niall Twitter subjects entering |
| NON-SENSITIVE | CAPVID_00025_Propublica Parler 1253 Near Capitol - Breaching Fence |
| NON-SENSITIVE | CAPVID_00026_Propublica Parler 1357 Near Capitol Barricades Being Removed |
| NON-SENSITIVE | CAPVID_00027_Propublica Parler 1406 Near Capitol Pushing Past Police Line |
| NON-SENSITIVE | CAPVID_00028_Propublica Parler 1411 Near Capitol Pushing up Scaffolding |
| NON-SENSITIVE | CAPVID_00029_Propublica Parler 1412 Near Capitol Reaching Walls and Banging on Windows |
| NON-SENSITIVE | CAPVID_00030_Propublica Parler 1413 Near Capitol - Radio |
| NON-SENSITIVE | CAPVID_00031_Propublica Parler 1413 Near Capitol - Windows |
| NON-SENSITIVE | CAPVID_00032_Propublica Parler 1414 Inside the Capitol |
| NON-SENSITIVE | CAPVID_00033_Propublica Parler 1415 Inside the Capitol |
| NON-SENSITIVE | CAPVID_00034_Propublica Parler 1501 inside the Capitol - Rotunda |
| NON-SENSITIVE | CAPVID_00035_Propublica Parler 1512 Inside the Capitol |
| NON-SENSITIVE | CAPVID_00036_realJamesKlug Twitter Klein brothers breach door part 2 |

| Protective Order Designation | File Name |
|------------------------------|---|
| NON-SENSITIVE | CAPVID_00037_realJamesKlug Twitter Klein brothers breach door |
| NON-SENSITIVE | CAPVID_00038_RFIRN Eastside Capitol Building youtube.com |
| NON-SENSITIVE | CAPVID_00039_SRM Pro Trump Protestors Beat Police Officer youtube.com |
| NON-SENSITIVE | CAPVID_00040_SRM Scenes of Chaos outside US Capitol youtube.com |
| NON-SENSITIVE | CAPVID_00041_The Sun Live Stream youtube.com |
| NON-SENSITIVE | CAPVID_00042_washingtondc theellipse live irl LIVE in DC where Trump has called in the PATRIOTS |
| NON-SENSITIVE | CAPVID_00043_Video showing breach and Pezzola shield carry |
| NON-SENSITIVE | CAPVID_00044_IMG_9475 |
| NON-SENSITIVE | CAPVID_00045_IMG_9476 |
| NON-SENSITIVE | CAPVID_00046_IMG_9477 |
| NON-SENSITIVE | CAPVID_00047_IMG_9481 |
| NON-SENSITIVE | CAPVID_00048_IMG_9483 |
| NON-SENSITIVE | CAPVID_00049_IMG_9492 |
| NON-SENSITIVE | CAPVID_00050_IMG_9495 |
| NON-SENSITIVE | CAPVID_00051_IMG_9496 |
| NON-SENSITIVE | CAPVID_00052_IMG_9508 |
| NON-SENSITIVE | CAPVID_00053_IMG_9531 |
| NON-SENSITIVE | CAPVID_00054_IMG_9573 |
| NON-SENSITIVE | CAPVID_00055_4104714703243719183 |
| NON-SENSITIVE | CAPVID_00056_camvideo_5702bda6 |
| NON-SENSITIVE | CAPVID_00057_IMG_1538 |
| NON-SENSITIVE | CAPVID_00058_IMG_1539 |
| NON-SENSITIVE | CAPVID_00059_IMG_1540 |
| NON-SENSITIVE | CAPVID_00060_IMG_1542 |
| NON-SENSITIVE | CAPVID_00061_IMG_1543 |
| NON-SENSITIVE | CAPVID_00062_IMG_1544 |
| NON-SENSITIVE | CAPVID_00063_IMG_1545 |
| NON-SENSITIVE | CAPVID_00064_IMG_1546 |
| NON-SENSITIVE | CAPVID_00065_IMG_1547 |
| NON-SENSITIVE | CAPVID_00066_IMG_1548 |
| NON-SENSITIVE | CAPVID_00067_IMG_1549 |
| NON-SENSITIVE | CAPVID_00068_IMG_1550 |
| NON-SENSITIVE | CAPVID_00069_IMG_1551 |
| NON-SENSITIVE | CAPVID_00070_IMG_1552 |
| NON-SENSITIVE | CAPVID_00071_IMG_1553 |
| NON-SENSITIVE | CAPVID_00072_IMG_1554 |
| NON-SENSITIVE | CAPVID_00073_IMG_1555 |
| NON-SENSITIVE | CAPVID_00074_IMG_1556 |
| NON-SENSITIVE | CAPVID_00075_IMG_1557 |
| NON-SENSITIVE | CAPVID_00076_IMG_1558 |
| NON-SENSITIVE | CAPVID_00077_IMG_1559 |
| NON-SENSITIVE | CAPVID_00078_IMG_1560 |
| NON-SENSITIVE | CAPVID_00079_IMG_1561 |
| NON-SENSITIVE | CAPVID_00080_IMG_1562 |
| NON-SENSITIVE | CAPVID_00081_IMG_1563 |
| NON-SENSITIVE | CAPVID_00082_IMG_1564 |
| NON-SENSITIVE | CAPVID_00083_IMG_1566 |
| NON-SENSITIVE | CAPVID_00084_IMG_1568 |
| NON-SENSITIVE | CAPVID_00085_IMG_1569 |
| NON-SENSITIVE | CAPVID_00086_IMG_1570 |
| NON-SENSITIVE | CAPVID_00087_IMG_1572 |
| NON-SENSITIVE | CAPVID_00088_IMG_1573 |
| NON-SENSITIVE | CAPVID_00089_IMG_1575 |
| NON-SENSITIVE | CAPVID_00090_IMG_1576 |
| NON-SENSITIVE | CAPVID_00091_IMG_1577 |

ATTACHMENT A - September 21, 2021
Discovery Index

| Protective Order Designation | File Name |
|------------------------------|---|
| NON-SENSITIVE | CAPVID_00092_IMG_1578 |
| NON-SENSITIVE | CAPVID_00093_IMG_1580 |
| NON-SENSITIVE | CAPVID_00094_IMG_1581 |
| NON-SENSITIVE | CAPVID_00095_IMG_1582 |
| NON-SENSITIVE | CAPVID_00096_IMG_1583 |
| NON-SENSITIVE | CAPVID_00097_IMG_1584 |
| NON-SENSITIVE | CAPVID_00098_IMG_1585 |
| NON-SENSITIVE | CAPVID_00099_IMG_1588 |
| NON-SENSITIVE | CAPVID_00100_IMG_1589 |
| NON-SENSITIVE | CAPVID_00101_IMG_1592 |
| NON-SENSITIVE | CAPVID_00102_IMG_1593 |
| NON-SENSITIVE | CAPVID_00103_IMG_1594 |
| NON-SENSITIVE | CAPVID_00104_IMG_1595 |
| NON-SENSITIVE | CAPVID_00105_IMG_1596 |
| NON-SENSITIVE | CAPVID_00106_IMG_1597 |
| NON-SENSITIVE | CAPVID_00107_IMG_1598 |
| NON-SENSITIVE | CAPVID_00108_IMG_1599 |
| NON-SENSITIVE | CAPVID_00109_IMG_1600 |
| NON-SENSITIVE | CAPVID_00110_IMG_1601 |
| NON-SENSITIVE | CAPVID_00111_IMG_1602 |
| NON-SENSITIVE | CAPVID_00112_IMG_1603 |
| NON-SENSITIVE | CAPVID_00113_IMG_1604 |
| NON-SENSITIVE | CAPVID_00114_IMG_1606 |
| NON-SENSITIVE | CAPVID_00115_IMG_1607 |
| NON-SENSITIVE | CAPVID_00116_IMG_1610 |
| NON-SENSITIVE | CAPVID_00117_IMG_1611 |
| NON-SENSITIVE | CAPVID_00118_IMG_1612 |
| NON-SENSITIVE | CAPVID_00119_IMG_1614 |
| NON-SENSITIVE | CAPVID_00120_IMG_1615 |
| NON-SENSITIVE | CAPVID_00121_IMG_1616 |
| NON-SENSITIVE | CAPVID_00122_IMG_1617 |
| NON-SENSITIVE | CAPVID_00123_IMG_1618 |
| NON-SENSITIVE | CAPVID_00124_IMG_1619 |
| NON-SENSITIVE | CAPVID_00125_IMG_1620 |
| NON-SENSITIVE | Eddie Block Photos and Videos - January 6 |



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*

September 23, 2021

Eugene Gorokhov, Esq.
Burnham & Gorokhov, PLLC
1424 K Street NW, Suite 500
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 the [REDACTED] USAfx folder a copy of evidence item E6448090 which consists of data obtained pursuant to a search warrant served on Facebook, Inc. This item was previously produced to counsel for Jonathanpeter Klein with other "1B" items.

Please let me know if you have any difficulty accessing this folder or have any questions.

Sincerely,

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

cc: Michelle M. Sweet, Esq.



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

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September 27, 2021

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

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

Dear Counsel:

As part of our ongoing discovery production in this case, we produced the following information on September 24, 2021:

1. 4,044 files (over one terabyte) consisting of U.S. Capitol Police ("USCP") Closed Circuit Video ("CCV") footage from 118 cameras has been shared to the defense instance of evidence.com. The contents of footage being shared includes video from the interior of the U.S. Capitol Visitor Center and from the Capitol grounds. These files are designated Sensitive under the protective order. Additional footage will be provided on a rolling basis, as we ingest it into our own instance of evidence.com.
2. Twenty files that are exhibits to previously produced USCP OPR reports, and a corresponding index, have been shared via USAfx and you should have received a notification via email. Any applicable sensitivity designations are reflected in the index. Additional exhibits will be provided on a rolling basis as we continue to ingest and quality-check them.
3. Forty-two files that consist of MPD internal investigation reports and exhibits, and a corresponding index, have been shared via a second, separate USAfx production, and you should have received a notification via email. These reports and exhibits are unredacted and thus designated Highly Sensitive under the protective order.

The Federal Public Defender for the District of Columbia (“FPD”) has agreed to serve as the Discovery Liaison for defense counsel in Capitol Breach cases. FPD is currently reviewing the various features of evidence.com and testing out the capabilities of the program with sample data. Within the next two weeks, FPD will be sending out information to defense counsel that includes a point-of-contact for discovery-related inquiries, the procedures to follow for obtaining a license to access evidence.com, and a quick start guide for defense counsel to use with evidence.com.

It has come to our attention that there are sensitivities that must be addressed prior to large scale disclosure of body-worn-camera footage. We are working diligently to resolve these issues and in the interim we have produced a sample of fifty body-worn-camera files to FPD’s instance of evidence.com. This sample will allow our technological teams to discuss the necessary infrastructure and workflows that need to be implemented. Ultimately, we intend to produce the majority of body-worn-camera footage with the least restrictive applicable sensitivity designations, if any, in order to facilitate defendant review.

In the near future, we expect to provide tools that will assist your review of the voluminous video footage described above, to include:

1. Camera maps for USCP CCV;
2. Our work product, consisting of a spreadsheet and related zone maps, identifying body-worn-camera footage by agency, officer, video start time, a summary of events, and location of the camera in 15-minute increments; and
3. Global Positioning Satellite information for Metropolitan Police Department radios, which may be of some assistance in identifying officers whose body-worn-cameras were recording at a particular time and location.

I will forward additional discovery as it becomes available. If you have any questions or if you fail to receive two separate USAfx invitations in connection with this production, please feel free to contact me.

Sincerely,

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