UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

:

v. : Case No. 21-CR-237 (RDM)

.

JONATHANPETER ALLEN KLEIN and

MATTHEW LELAND KLEIN,

:

Defendants. :

GOVERNMENT'S FOURTH NOTICE REGARDING DISCOVERY CORRESPONDENCE

The United States of America, by and through undersigned counsel, respectfully submits this fourth notice of its correspondence to defense counsel regarding discovery productions to date. Filed as an attachment 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.

Attachment	Letter Date	Recipient(s)
1	September 29, 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

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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

September 29, 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 following Non-Sensitive and Highly Sensitive items:

Protective Order Designation	File Name
NON-SENSITIVE	266O-PD-3386048_0000100_Redacted.pdf
NON-SENSITIVE	266O-PD-3386048_0000101.pdf
NON-SENSITIVE	266O-PD-3386048_0000101_1A0000013_0000001.jpg
NON-SENSITIVE	266O-PD-3386048_0000101_1A0000013_0000002.jpg
NON-SENSITIVE	266O-PD-3386048_0000101_1A0000014_0000001.pdf
NON-SENSITIVE	266O-PD-3386048_0000102.pdf
	266O-PD-
NON-SENSITIVE	3386048_0000102_1A0000015_0000001_PHYSICAL.pdf
NON-SENSITIVE	266O-PD-3386048_0000103.pdf
NON-SENSITIVE	266O-PD-3386048_0000103_Import.pdf
NON-SENSITIVE	266O-PD-3386048_0000105.pdf
NON-SENSITIVE	266O-PD-3386048_0000105_1A0000016_0000001.pdf
NON-SENSITIVE	266O-PD-3386048_0000105_Import.pdf
NON-SENSITIVE	266O-PD-3386048_0000106.pdf
NON-SENSITIVE	266O-PD-3386048_0000106_1A0000071_0000001.jpg

NON-SENSITIVE	266O-PD-3386048_0000106_1A0000071_0000002.pdf
NON-SENSITIVE	266O-PD-3386048_0000106_1A0000071_0000003.pdf
NON-SENSITIVE	266O-PD-3386048_0000106_1A0000071_0000004.pdf
NON-SENSITIVE	266O-PD-3386048_0000106_1A0000072_0000001.pdf
NON-SENSITIVE	266O-PD-3386048_0000107.pdf
	266O-PD-
NON-SENSITIVE	3386048_0000107_1A0000073_0000001_PHYSICAL.pdf
NON-SENSITIVE	266O-PD-3386048-GJ_0000010.pdf
NON-SENSITIVE	266O-PD-3386048-GJ_0000010_1A0000009_0000001.pdf
NON-SENSITIVE	266O-PD-3386048-GJ_0000010_1A0000009_0000002.pdf
NON-SENSITIVE	266O-PD-3386048-GJ_0000010_1A0000009_0000004.pdf
NON-SENSITIVE	266O-PD-3386048-GJ_0000010_1A0000009_0000005.pdf
HIGHLY	
SENSITIVE	266O-PD-3386048_0000104_1A0000069_0000001.pdf
HIGHLY	266O-PD-
SENSITIVE	3386048_0000104_1A0000069_0000002_Redacted.pdf
HIGHLY	266O-PD-
SENSITIVE	3386048_0000104_1A0000070_0000001_Redacted.pdf
HIGHLY	
SENSITIVE	266O-PD-3386048_0000104_Redacted.pdf

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.

Please let me know if you have any difficulties accessing or would like to discuss any of these materials.

Sincerely,

<u>s/ Christopher K. Veatch</u>CHRISTOPHER K. VEATCHAssistant United States Attorney