

**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 FIFTH NOTICE
REGARDING DISCOVERY CORRESPONDENCE**

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

Exhibit	Letter Date	Recipient(s)
1	November 26, 2021	Counsel for Both Defendants
2	November 29, 2021	Counsel for Both Defendants

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
DC Bar No. 481052

By: /s/ Christopher K. Veatch
CHRISTOPHER K. VEATCH
Assistant United States Attorney, Detailee
IL Bar No. 6276097
219 S. Dearborn Street, 5th Floor
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*

November 26, 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

ATTACHMENT A
November 26, 2021 Discovery Letter

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
Non-Sensitive	266O-PD-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
Non-Sensitive	266O-PD-3386048_0000107_1A0000073_0000001_PHYSICAL.pdf
Non-Sensitive	266O-PD-3386048_0000109_1A0000017_0000001.pdf
Non-Sensitive	266O-PD-3386048_0000109_1A0000017_0000002.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
Sensitive	266O-PD-3386048_0000109.pdf
Sensitive	Facebook Raw Data
Sensitive	Jonathanpeter Klein Interview 3-23-2021
Sensitive	Matthew & Phillip Klein 3-23-2021
Highly Sensitive	266O-PD-3386048_0000104_1A0000069_0000001_Redacted.pdf
Highly Sensitive	266O-PD-3386048_0000104_1A0000069_0000002_Redacted.pdf
Highly Sensitive	266O-PD-3386048_0000104_1A0000070_0000001_Redacted.pdf
Highly Sensitive	266O-PD-3386048_0000104_Redacted.pdf



U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia

*Judiciary Center
555 Fourth St., N.W.
Washington, D.C. 20530*

November 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 entitled "2021.11.29 – Sensitive Discovery (1B7, 8, 10 Review)." 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