

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Case No. 21-cr-0166 (TFH)</b>
	:	
<b>ROBERT MAURICE REEDER,</b>	:	
	:	
<b>Defendant.</b>	:	

**NOTICE OF FILING**

The United States of America hereby submits this notice that the government has provided the attached letter, together with the discovery described therein, to counsel for the defendant.

Respectfully submitted,

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

By: /s/ Joshua S. Rothstein  
Joshua S. Rothstein  
Assistant United States Attorney  
N.Y. Bar Number 4453759  
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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*

April 19, 2021

Robert Bonsib, Esq.  
6411 Ivy Lane  
Suite 116  
Greenbelt, MD 20770

Re: *United States v. Robert Maurice Reeder*  
Case No. 21-CR-166 (TFH)

Dear Counsel:

I have uploaded preliminary discovery on USAFX, including the following materials:

- Investigation 302s;
- Seven screenshots of Mr. Reeder at the Capitol;
- A MP4 video of Mr. Reeder at the Capitol;
- A search warrant return from Facebook for Mr. Reeder's account; and
- A Cellbrite report from data obtained from Mr. Reeder's cell phone.

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.

This material is subject to the terms of the Protective Order issued in this case.

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 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 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 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,



Joshua S. Rothstein  
Assistant United States Attorney

Enclosure(s)  
cc: