

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

UNITED STATES OF AMERICA :
 : **CASE NO. 21-cr-537**
 v. :
 :
Ryan Samsel :
 :
 Defendant. :

NOTICE OF FILING

On August 16, 2021, the Government produced discovery to defense attorneys Stanley Woodward and Juli Haller in this case, who had entered their appearances August 12. The discovery letter provided an index of the 75 FBI serials produced at that time in Samsel’s case and also explained that, “the contents of this discovery include Samsel’s two phone extractions and interview, medical records for O-1 [Officer C.E.], and videos and images captured from social media, amongst other things.”

In addition to the first production, there have now been seven additional general productions of discovery pertaining to the Capitol Riots. For the purpose of illustrating the government’s consistent and diligent efforts to produce voluminous discovery materials arising out of the breach of the United States Capitol on January 6, 2021 (the “Capitol Breach”), the USAO has filed status memoranda describing the efforts of the Capitol Breach Discovery Team on a regular basis. We request that those memoranda, attached hereto and listed below, be made part of the record in this case:

1. Memorandum Regarding Status of Discovery as of July 12, 2021 (and Exhibit A);
2. Memorandum Regarding Status of Discovery as of August 23, 2021;
3. Memorandum Regarding Status of Discovery as of September 14, 2021; and
4. Memorandum Regarding Status of Discovery as of October 21, 2021;
5. Memorandum Regarding Status of Discovery as of November 5, 2021.

Respectfully submitted,
MATTHEW M. GRAVES
United States Attorney
DC Bar No. 481052

By: /s/ Emily A. Miller
EMILY A. MILLER
Capitol Breach Discovery Coordinator
DC Bar No. 462077
555 Fourth Street, N.W., Room 5826
Washington, DC 20530
Emily.Miller2@usdoj.gov
(202) 252-6988

 /s/ April N. Russo
April N. Russo
Assistant U.S. Attorney
PA Bar: 313475
U.S. Attorney's Office for the District of Columbia
555 Fourth Street NW, Fourth Floor
Washington, DC 20530
(202)-252-1717
April.russo@usdoj.gov

 /s/ Danielle Rosborough
Danielle Rosborough
D.C. Bar No. 1016234
Trial Attorney, National Security Division
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, D.C. 20530
202-514-0073
Danielle.Rosborough@usdoj.gov