

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

UNITED STATES OF AMERICA

v.

TRACI J. SUNSTRUM,

Defendant.

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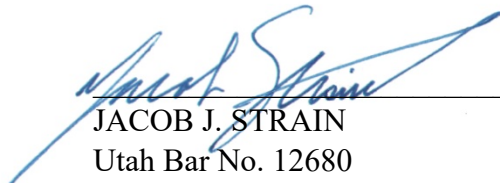
CRIMINAL NO. 1:21-mj-00371

NOTICE OF FILING

The Government requests that the attached discovery letter, dated September 13, 2021, be made part of the record in the above-captioned case.

Respectfully submitted,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY



JACOB J. STRAIN

Utah Bar No. 12680

Assistant United States Attorney

U.S. Attorney's Office for the District of Columbia

555 4th Street, N.W.

Washington, D.C. 20530



U.S. Department of Justice

CHANNING D. PHILLIPS
Acting United States Attorney
District of Utah

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

September 13, 2021

Daniel J. Dubois
ddlaw33@gmail.com

RE: U.S. v. TRACI J. SUNSTRUM (1:21-mj-00371)

Dear Counsel,

Pursuant to our discovery obligations, we have provided the following files via USAfx on September 13, 2021. Note that many of these files and their related physical attachments are currently being formally processed for discovery by the discovery team assigned to the Capitol Riots cases. As such, some of the same files will be re-produced with bates-stamps at a later date.

1. 20210106_082851.mp4
2. 20210106_082851_thumb.jpg
3. 20210106_104616.mp4
4. 20210106_104616_thumb.jpg
5. 20210106_130353.mp4
6. 20210106_130353_thumb.jpg
7. 20210106_132128.mp4
8. 20210106_132128_thumb.jpg
9. 20210106_132318.mp4
10. 20210106_132318_thumb.jpg
11. 20210106_133913.mp4
12. 20210106_133913_thumb.jpg
13. 20210106_134836.mp4
14. 20210106_134836_thumb.jpg
15. 20210106_135254.mp4
16. 20210106_135254_thumb.jpg
17. 20210106_140033.mp4
18. 20210106_140033_thumb.jpg
19. 20210106_140419_02.mp4

20. 20210106_140419_02_thumb.jpg
21. 20210106_140419_05.mp4
22. 20210106_140419_05_thumb.jpg
23. 20210106_140419_07.mp4
24. 20210106_140419_07_thumb.jpg
25. 20210106_140429_2.mp4
26. 20210106_140429_2_1.mp4
27. 20210106_140429_2_1_thumb.jpg
28. 20210106_140429_2_thumb.jpg
29. 20210106_143046.mp4
30. 20210106_143046_1.mp4
31. 20210106_143046_1_thumb.jpg
32. 20210106_143046_2.mp4
33. 20210106_143046_2_thumb.jpg
34. 20210106_143046_thumb.jpg
35. 20210106_143854.mp4
36. 20210106_143854_thumb.jpg
37. 20210106_144224.mp4
38. 20210106_144224_thumb.jpg
39. 20210106_144258.mp4
40. 20210106_144258_thumb.jpg
41. 20210106_144959.mp4
42. 20210106_144959_thumb.jpg
43. 20210106_151732.mp4
44. 20210106_151732_thumb.jpg
45. 20210106_153416.mp4
46. 20210106_153416_thumb.jpg
47. 20210126_150821.mp4
48. 20210126_150821_thumb.jpg
49. activityAnalytics.png
50. activityAnalytics.png
51. address-entry.png
52. address-entry.png
53. attachment.png
54. attachment.png
55. calendar.png
56. calendar.png
57. call.png
58. call.png
59. car-entry.png
60. car-entry.png
61. chat.png
62. chat.png
63. data-files.png
64. data-files.png
65. Deleted1.png

- 66. Deleted1.png
- 67. Deleted-icon.png
- 68. Deleted-icon.png
- 69. email.png
- 70. email.png
- 71. email-entry.png
- 72. email-entry.png
- 73. email-read.png
- 74. email-read.png
- 75. email-sent.png
- 76. email-sent.png
- 77. fax-entry.png
- 78. fax-entry.png
- 79. FB_IMG_1619741082290_133801799220728.jpg
- 80. FB_IMG_1619741082290_133801799220728.jpg
- 81. FB_IMG_1619741082290_133801799220728_thumb.jpg
- 82. FB_IMG_1621041794720.jpg
- 83. Forwarded.png
- 84. Forwarded.png
- 85. FromArrow.png
- 86. FromArrow.png
- 87. general-entry.png
- 88. general-entry.png
- 89. google-earth.png
- 90. google-earth.png
- 91. google-maps.png
- 92. google-maps.png
- 93. goto.png
- 94. goto.png
- 95. HeaderPdf.jpg
- 96. HeaderPdf.jpg
- 97. home-entry.png
- 98. home-entry.png
- 99. infected.png
- 100. infected.png
- 101. Intact-icon.png
- 102. Intact-icon.png
- 103. ipconnection.png
- 104. ipconnection.png
- 105. logoIcon.png
- 106. logoIcon.png
- 107. map-icon.png
- 108. map-icon.png
- 109. mobile-entry.png
- 110. mobile-entry.png
- 111. notes-entry.png

112. notes-entry.png
113. office-entry.png
114. office-entry.png
115. organization.png
116. organization.png
117. pager-entry.png
118. pager-entry.png
119. Report-Scoped Evidence.pdf
120. Resized_20210430_225335.jpeg
121. Resized_20210430_225335.jpeg
122. Resized_20210430_225335_thumb.jpg
123. Resized_Screenshot_20210430-221236_Facebook.jpeg
124. Resized_Screenshot_20210430-221236_Facebook.jpeg
125. Resized_Screenshot_20210430-221236_Facebook_thumb.jpg
126. Resized_Screenshot_20210504-211150_Gmail.jpeg
127. Resized_Screenshot_20210504-211150_Gmail.jpeg
128. Resized_Screenshot_20210504-211150_Gmail_thumb.jpg
129. Resized_Screenshot_20210514-231637_Brave.jpeg
130. Resized_Screenshot_20210514-231637_Brave.jpeg
131. Resized_Screenshot_20210514-231637_Brave_thumb.jpg
132. Scrambled.png
133. Scrambled.png
134. SentWithSiri.png
135. SentWithSiri.png
136. skype.png
137. skype.png
138. star.png
139. star.png
140. sub-element.png
141. sub-element.png
142. Tag.png
143. Tag.png
144. Text Msg.pdf
145. thumb_FB_IMG_1619741082290_133801799220728.jpg
146. thumb_FB_IMG_1621041794720.jpg
147. thumb_Resized_20210430_225335.jpg
148. thumb_Resized_Screenshot_20210430-221236_Facebook.jpg
149. thumb_Resized_Screenshot_20210504-211150_Gmail.jpg
150. thumb_Resized_Screenshot_20210514-231637_Brave.jpg
151. ToArrow.png
152. ToArrow.png
153. Unknown-icon.png
154. Unknown-icon.png
155. warning-icon.png
156. warning-icon.png
157. web-address-entry.png

- 158. web-address-entry.png
- 159. work-entry.png
- 160. work-entry.png

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(s) 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(s) 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(s) provide the government with the appropriate written notice if defendant(s) 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.

By: /s/ Jacob J. Strain
JACOB J. STRAIN
Assistant United States Attorney