

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

UNITED STATES OF AMERICA,

v.

WILLIAM ALEXANDER POPE,

Defendant.

Case No.: 1:21-cr-00128-RC

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**UPDATE ON GOVERNMENT PRODUCTION OF DISCOVERY**

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On April 27, 2023, the government filed a ‘Joint Status Update’ (ECF No. 104) committing to provide me, the defendant with “a physical copy of those items contained in Global Discovery that are marked as ‘Sensitive,’ and those items which have no security designations.”

However, the government has not yet provided me with copies of any of those files. In a June 9, 2023, call, the government’s representative, Ms. Kelly Moran, attempted to walk back the government’s promise to provide physical copies of all files I am permitted to possess under the protective order. Ms. Moran claimed the task of loading files on a hard drive is too technologically challenging for the government<sup>1</sup> even though the government was able to upload and organize those same files into the Relativity index.

This explanation is not believable or acceptable.

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<sup>1</sup> The same United States government that put men on the moon and now mounts laser canons on warships.

The government has previously told me they have fulfilled their Brady obligations by producing some Brady information only in the Global Discovery, rather than in my case specific discovery. Since the government has not specified what those materials are, the only way for me to find those Brady materials is to sift through the entirety of the voluminous Global Discovery. In early February, I requested the government provide me copies of all files I am allowed to possess and at our April status hearing, Judge Contreras instructed the government to confer with me on fulfilling that option. That resulted in the government's April 27, 2023, commitment to provide physical copies of all of those files (ECF No 104).

My continued expectation is that the government will honor their commitment made in ECF No. 104, to provide me with physical copies of all discovery files I am allowed to possess under the protective order. Should the government break this promise to provide physical copies of all files, I will submit a motion to compel production.

Respectfully submitted to the court.

By: William Pope

/s/

William Pope

Pro Se Officer of the Court

Topeka, Kansas

Certificate of Service

I certify that a copy of this was filed electronically for all parties of record on June 11, 2023.

/s/

William Alexander Pope, Pro Se