

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

**UNITED STATES OF AMERICA**

**v.**

**ANTHONY PUMA,**

**Defendant**

**Case No.: 21-mj-447**

**GOVERNMENT'S NOTICE OF DISCOVERY**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully gives notice that undersigned counsel for the government has provided counsel, for the defendant, discovery in the above-mentioned case as outlined in the government's attached discovery letter dated June 25, 2021.

Respectfully submitted,

Channing D. Phillips  
Acting U.S. Attorney  
D.C. Bar No. 415793.

By:           /s// Amy E. Larson

Amy E. Larson  
Assistant United States Attorney  
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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*

June 25, 2021

Maria N. Jacob  
Assistant Federal Public Defender  
Office of the Federal Public Defender  
for the District of Columbia  
625 Indiana Avenue, N.W. Suite 550  
Washington, D.C. 20004

Re: *United States v. Anthony Puma*  
Case No. 21-mj-447

Dear Counsel:

We have provided, via USAF<sub>x</sub>, preliminary discovery in this case that contains the following materials:

- 176-DE-3369044 -28398 Mortenview (folder)
- Videos (folder)
- LMK\_Output\_2021-01-17 164727Z (folder)
- PUMA Facebook Return\_doc2\_290308449315714.pdf
- PUMA Facebook Return\_doc1\_284008693392652.pdf
- 0176-DE-3369044\_0000013\_1A0000008\_0000001.zip
- preservation-2.html
- preservation-1.html
- 0176-DE-3369044-GJ\_0000006\_1A0000007\_0000002.zip
- 0176-DE-3369044\_0000016\_1A0000010\_0000001.zip
- 0176-DE-3369044-GJ\_0000005\_1A0000006\_0000001.zip
- 0176-DE-3369044\_0000001\_Redacted.pdf
- 0176-DE-3369044\_0000002\_Redacted.pdf
- 0176-DE-3369044\_0000003.pdf
- 0176-DE-3369044\_0000004.pdf
- 0176-DE-3369044\_0000005.pdf
- 0176-DE-3369044\_0000006\_Redacted.pdf

- 0176-DE-3369044\_0000007\_1A0000004\_0000001.pdf
- 0176-DE-3369044\_0000007\_1A0000004\_0000002.png
- 0176-DE-3369044\_0000007\_1A0000004\_0000003.jpg
- 0176-DE-3369044\_0000007\_1A0000004\_0000004.pptx
- 0176-DE-3369044\_0000007\_1A0000004\_0000005.pdf
- 0176-DE-3369044\_0000007\_1A0000004\_0000006.jpg
- 0176-DE-3369044\_0000011.pdf
- 0176-DE-3369044\_0000012\_Import.pdf
- 0176-DE-3369044\_0000013.pdf
- 0176-DE-3369044\_0000014.pdf
- 0176-DE-3369044\_0000015.pdf
- 0176-DE-3369044\_0000015\_1A0000009\_0000001.pdf
- 0176-DE-3369044\_0000015\_1A0000009\_0000003.pdf
- 0176-DE-3369044\_0000016\_Redacted.pdf
- 0176-DE-3369044\_0000017.pdf
- 0176-DE-3369044\_0000018.pdf
- 0176-DE-3369044\_0000021.pdf
- 0176-DE-3369044\_0000022.pdf
- 0176-DE-3369044\_0000022\_1A0000015\_0000001.pdf
- 0176-DE-3369044\_0000023.pdf
- 0176-DE-3369044\_0000025.pdf
- 0176-DE-3369044\_0000025\_1A0000017\_0000001.pdf
- 0176-DE-3369044\_0000025\_1A0000018\_0000001.pdf
- 0176-DE-3369044\_0000027.pdf
- 0176-DE-3369044\_0000028.pdf
- 0176-DE-3369044\_0000028\_1A0000021\_0000001.pdf
- 0176-DE-3369044-GJ\_0000002.pdf
- 0176-DE-3369044-GJ\_0000003.pdf
- 0176-DE-3369044-GJ\_0000004.pdf
- 0176-DE-3369044-GJ\_0000005.pdf
- 0176-DE-3369044-GJ\_0000006.pdf
- 0176-DE-3369044-GJ\_0000006\_1A0000007\_0000001.pdf
- 0176-DE-3369044-GJ\_0000007.pdf
- 0176-DE-3369044-GJ\_0000008\_Redacted.pdf
- 210527\_0017.MP3
- 18\_GOPR0033.jpeg
- LMK\_Report\_2021-01-17 164727Z.pdf
- EFile\_W\_210608\_21mc50762-2\_APP.pdf
- ReportSIMCARD\_3227838.txt
- ATT\_Records\_Key.pdf
- ReportAU\_3227838.pdf
- ReportAU\_3227838.txt
- ReportCT\_3227838.pdf
- ReportCT\_3227838.txt
- ReportICDR\_3227838.pdf
- ReportICDR\_3227838.txt
- ReportIMSI\_3227838.pdf
- ReportIMSI\_3227838.txt
- ReportLandline\_3227838.pdf
- ReportLandline\_3227838.txt
- ReportSIMCARD\_3227838.pdf
- SENSITIVE (folder)
- HIGHLY SENSITIVE (folder)

There are subfolders in this production that are clearly labeled as “**SENSITIVE**” and “**HIGHLY SENSITIVE.**” As detailed in the Protective Order, these Materials must be maintained in your custody and control. While you may show these documents to the defendant, you may not allow the defendant to maintain copies or write down any personal identity information. Furthermore, absent the Court’s permission, you may not include this information in any public filings.

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. 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.

Sincerely,

/s//Amy E. Larson  
Amy E. Larson  
Assistant United States Attorney