

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

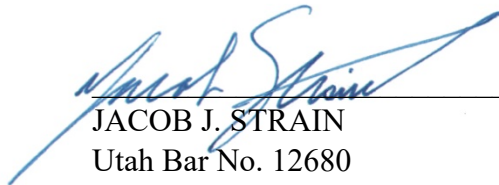
UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 1:21-mj-00279-RMM
	:	
JACOB TRAVIS CLARK,	:	
	:	
Defendant.	:	

NOTICE OF FILING

The Government requests that the attached discovery letter, dated May 3, 2021, be made part of the record in the above-captioned case.

Respectfully submitted,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY



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U.S. Department of Justice

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*Judiciary Center
555 Fourth St. N.W.
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May 3, 2021

Discovery Letter #1

Eugene Ohm
FEDERAL PUBLIC DEFENDER FOR THE DISTRICT OF COLUMBIA
625 Indiana Avenue, NW, Suite 550
Washington, DC 20004

RE: U.S. v. JACOB TRAVIS CLARK (1:21-mj-00279-RMM)

Dear Counsel,

Pursuant to our discovery obligations and pursuant to the protective order, we have provided the following files via USAfx on May 3, 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.

0157 USCH 01 near H159 OAP Corridor - 2021-01-06_19h18min30s.mp4
0204 USCS 02 Room 224 - 2021-01-06_19h40min01s.mp4
0205 USCS 02 West Stairs near S221 - 2021-01-06_19h40min01s.mp4
0303USCS03SenateGallerySEnearS309_2021-01-06_14h34min02s513ms.mp4
0686 USCH 02 Rotunda Door Interior - 2021-01-06_19h37min05s.mp4
7029 USCS 02 Rotunda Door Interior - 2021-01-06_19h35min54s.mp4
FBI_Investigation-Agent_Kimble-BWC_of_Daniels__R.mp4
FBI_investigation-Agent_Kimble-BWC_of_Humphrey__M.mp4
FBI_Investigation-Agent_Kimble-BWC_of_Rios__C.mp4
CGL695 Clark vehicle.pdf
Clark Unemployment.pdf
CLARK_JACOB_DL.pdf
Jacob Clark- Name Search.pdf
Jacob Clark- Possible Face Results.pdf
U_To_document_US_Capitol_CCTV_footage.pdf

arrest warrant clark.pdf
Clark_Arrest_302.pdf
Recpt Prpty Rght Warning.pdf
Clark_wearing_clothing_on_4.21.2021.jpg
Clark_DL_from_4.21.2021.jpg
Screaming Nazis.jpg
Pointing.Shouting.jpg
Pointing.directing.jpg
Next time.jpg
Hallway.jpg

We recognize the government's discovery obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), its progeny, and Rule 16. We will continue provide timely disclosure if any such material comes to light. Consistent with *Giglio*, *Ruiz*, and 18 U.S.C. § 3500, we will provide information about government witnesses prior to trial and in compliance with the court's trial management order.

We 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. We 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). We 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, we 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. We will forward additional discovery as it becomes available. If you have any questions, please feel free to contact us.

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