

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

UNITED STATES OF AMERICA

v.

ZACHARY WILSON,

Defendant.

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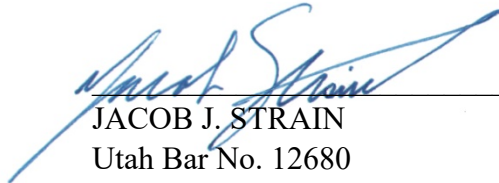
CRIMINAL NO. 1:21-MJ-229-ZMF

NOTICE OF FILING

The Government requests that the attached discovery letter, dated May 19, 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

CHANNING D. PHILLIPS
Acting United States Attorney
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*Judiciary Center
555 Fourth St. N.W.
Washington, D.C. 20530*

May 19, 2021

Discovery Letter #2

Joanne Slaight, Attorney at Law
400 7th St, NW, Suite 206
Washington, DC 20004

RE: U.S. v. Zachary Wilson (1:21-MJ-229-ZMF)

Dear Counsel,

Pursuant to our discovery obligations, we have provided the following files via USAfx on May 19, 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.

BWC Video (folder)

Zach Wilson Body Cam Footage.jpg
Zachary_Wilson-2.mp4
Zachary_Wilson-3.mp4
Zachary_Wilson-4.mp4
Zachary_Wilson.mp4

CCTV Video (folder)

0102 USCS 01 Senate Wing Door near S139-2021-01-06_14h24min00s000ms.mp4
0153 USCH 01 House Wing Door-2021-01-06_14h42min00s000ms.mp4
0171 USCH 01 Memorial Door-2021-01-06_14h29min00s000ms.mp4
0176 USCH 01 South Door-2021-01-06_14h43min00s000ms.mp4
0263 USCH 02 H227 Hallway (1_6_2021 2_32_49 PM EST).png
0263 USCH 02 H227 Hallway (1_6_2021 2_32_53 PM EST).png
0263 USCH 02 H227 Hallway-2021-01-06_14h32min32s000ms.mp4
0402 USCH 01 Crypt North-2021-01-06_14h28min00s000ms.mp4
0402 USCH 01 Crypt North-2021-01-06_14h42min00s000ms.mp4
0403 USCH 01 Crypt South-2021-01-06_14h42min00s000ms.mp4

0935 USCH 02 H230-2021-01-06_14h34min15s000ms.mp4

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