

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

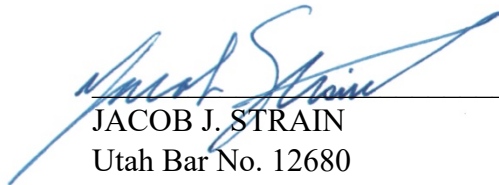
<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>CRIMINAL NO. 1:21-MJ-229-ZMF</b>
	:	
<b>ZACHARY WILSON,</b>	:	
	:	
<b>Defendant.</b>	:	

**NOTICE OF FILING**

The Government requests that the attached discovery letter, dated May 24, 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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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

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

**May 24, 2021**

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 24, 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.

0176-KC-3375962\_0000001.pdf  
0176-KC-3375962\_0000002.pdf  
0176-KC-3375962\_0000002\_Import.pdf  
0176-KC-3375962\_0000003.pdf  
0176-KC-3375962\_0000004.pdf  
0176-KC-3375962\_0000014.pdf  
0176-KC-3375962\_0000014\_1A0000001\_0000001.mov  
0176-KC-3375962\_0000014\_1A0000001\_0000002.mov  
0176-KC-3375962\_0000014\_1A0000001\_0000003.msg  
0176-KC-3375962\_0000014\_1A0000001\_0000004.mov  
0176-KC-3375962\_0000014\_1A0000001\_0000005.jpg  
0176-KC-3375962\_0000014\_1A0000001\_0000006.mov  
0176-KC-3375962\_0000014\_1A0000001\_0000007.mov  
0176-KC-3375962\_0000014\_1A0000001\_0000008.mov  
0176-KC-3375962\_0000014\_1A0000001\_0000009.mov  
0176-KC-3375962\_0000014\_1A0000001\_0000010.mov  
0176-KC-3375962\_0000014\_1A0000001\_0000011.msg  
0176-KC-3375962\_0000014\_1A0000001\_0000012.pdf

0176-KC-3375962\_0000014\_1A0000001\_0000013.mov  
0176-KC-3375962\_0000014\_1A0000001\_0000014.msg  
0176-KC-3375962\_0000014\_Import.pdf  
0176-KC-3375962\_0000024.pdf  
0176-KC-3375962\_0000024\_1A0000007\_0000001.jpg  
0176-KC-3375962\_0000025.pdf  
0176-KC-3375962\_0000026.pdf  
0176-KC-3375962\_0000026\_1A0000008\_0000001.msg  
0176-KC-3375962\_0000026\_Import.pdf  
0176-KC-3375962\_0000027.pdf  
0176-KC-3375962\_0000027\_1A0000004\_0000001\_PHYSICAL.pdf  
0176-KC-3375962\_0000027\_1A0000004\_0000002\_PHYSICAL.pdf  
0176-KC-3375962\_0000028.pdf  
0176-KC-3375962\_0000029.pdf  
0176-KC-3375962\_0000030.pdf  
0176-KC-3375962\_0000030\_1A0000009\_0000001\_PHYSICAL.pdf  
0176-KC-3375962\_0000031.pdf  
0176-KC-3375962\_0000031\_1A0000010\_0000001.pdf  
0176-KC-3375962\_0000032.pdf  
0176-KC-3375962\_0000032\_1A0000005\_0000001\_PHYSICAL.pdf  
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263 USCH 2 H227 Hallway (1\_6\_2021 2\_32\_49 PM EST).png  
263 USCH 2 H227 Hallway (1\_6\_2021 2\_32\_53 PM EST).png  
263 USCH 2 H227 Hallway-2021-01-06\_14h32min32s000ms.mp4  
263 USCH 2 H227 Hallway-2021-01-06\_14h33min50s000ms.asf  
931 USCH 2 H230-2021-01-06\_14h34min06s000ms.asf  
935 USCH 2 H230-2021-01-06\_14h34min14s000ms.asf  
935 USCH 2 H230-2021-01-06\_14h34min15s000ms.mp4  
959 USC 2 Rotunda South-2021-01-06\_14h38min07s000ms.asf  
960 USC 2 Rotunda North-2021-01-06\_14h38min07s000ms.asf  
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preservation-2.html  
README.txt  
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status\_updates\_3077045809017929.png  
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unified\_message\_209894690867347.jpg

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unified\_message\_2986437194791626.mp4  
unified\_message\_369239263222822.png  
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unified\_message\_416374969377924.mp4  
unified\_message\_547702746185905.gif  
unified\_message\_996840944144188.xlsx  
videos\_10218335994647010.mp4  
videos\_10218391140265616.mp4  
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videos\_718877478771157.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

