

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

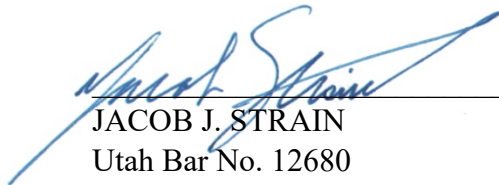
UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 1:21-cr-00341-CKK
	:	
JOHN DOUGLAS WRIGHT,	:	
	:	
Defendant.	:	

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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May 24, 2021

Discovery Letter #2

Noah Munyar
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RE: U.S. v. JOHN DOUGLAS WRIGHT (1:21-cr-00341-CKK)

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.

Main Case File (Folder)

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Exterior Capitol Building Barricade Video (Folder)

DXXXXXX Wright Capitol Barricade .mp4
DXXXXXX Wright Capitol Barrier Timeline.docx

Interior Capitol Building Video (Folder)

0686 USCH 02 Rotunda Door Interior - 2021-01-06_19h37min05s (1).mp4
EXIT VIEW 0686 USCH 02 Rotunda Door Interior.mp4
Updated Doug Wright Rotunda Door Interior Timeline.docx
Updated EXIT VIEW Doug Wright Rotunda Door Interior Timeline.docx
Updated Wright Rotunda Lobby Timeline.docx
Updated Wright Rotunda Main Timeline.docx
Wright 0960 USC 02 Rotunda North - 2021-01-06_19h40min01s.mp4
Wright 7216 USCH 02 Rotunda Lobby East Stairs - 2021-01-06_19h47min35s.mp4

Wright Facebook Videos (Folder)

DWvideoA_1.MOV
WrightFBvideo2_1.mp4

Facebook SW Return (Folder)

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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