

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-427 (CJN)
	:	
KURT PETERSON,	:	
	:	
Defendant.	:	

NOTICE OF FILING

The government requests that the attached discovery letter, dated August 10, 2021, be made part of the record in this case.

Respectfully submitted,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY
D.C. Bar No. 415793

By: /s/ Alison B. Prout
Alison B. Prout
Georgia Bar No. 141666
Assistant United States Attorney
Detailed to:
United States Attorney's Office
555 Fourth Street, N.W.
Washington, DC 20530
Phone: (202) 252-2641

CERTIFICATE OF SERVICE

On August 11, 2021, a copy of the foregoing notice and attached discovery letter were served on counsel for defendant through the Court's Electronic Filing System with the listed attachments provided to counsel through the means described in the discovery letter.

/s/ Alison B. Prout
Alison B. Prout
Assistant United States Attorney



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

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

August 10, 2021

VIA EMAIL AND USAFX

Laura Wyrosdick
Federal Defender Program
200 Theatre Building
629 Fourth Avenue
Louisville, KY 40202
Laura_Wyrosdick@fd.org

Re: *United States v. Kurt Peterson.*
Case No. 21-cr-427

Dear Ms. Wyrosdick:

Today I have made available to you additional preliminary discovery via the USAfx portal in a folder named "U.S. v. Kurt Peterson, 21-cr-427." Within that folder is a subfolder named "2021-08-10 Production" that contains the following materials:

- A file folder named "Sensitive" that includes 9 files, all of which are designated "Sensitive" under the Protective Order entered on August 10, 2021 (Doc. 15):

File Name	Description	Protective Order Designation
266O-LS-3374791 0000004 1A0004296 0000001 Redacted.pdf	Tip Review	SENSITIVE
266O-LS-3374791 0000010.pdf	Tip Review	SENSITIVE
266O-LS-3374791 0000010 1A0000001 0000001 Redacted.pdf	Tip Review	SENSITIVE
266O-LS-3374791 0000017 Import Redacted.pdf	Kurt Peterson Face Search	SENSITIVE
266O-LS-3374791 0000017 1A0000005 0000001 Redacted.pdf	Kurt Peterson Name Search	SENSITIVE

266O-LS-3374791 0000018 1A0000006 0000001 Redacted.pdf	Peterson Ops Plan	SENSITIVE
266O-LS-3374791 0000028 Import.pdf	Tip Review	SENSITIVE
266O-LS-3374791 0000028 1A0000002 0000001.png	BOLO 313 Additional Information	SENSITIVE
266O-LS-3374791 0000028 1A0000002 0000002.pdf	BOLO 313	SENSITIVE

- A file folder named “Highly Sensitive” that includes 8 files, all of which are designated “Highly Sensitive” under the Protective Order entered on August 10, 2021 (Doc. 15):

File Name	Description	Protective Order Designation
0264 USCH 02 Upper House Door Interior - 2021-01-06 19h36min17s.mp4	CCTV from U.S. Capitol	HIGHLY SENSITIVE
0264 USCH 02 Upper House Door Interior-2021-01-06 14h55min07s.mp4		HIGHLY SENSITIVE
0264 USCH 02 Upper House Door Interior-2021-01-06 14h55min40s.asf		HIGHLY SENSITIVE
0267 USCH 02 Upper House Door Interior-2021-01-06 14h55min07s.mp4		HIGHLY SENSITIVE
0266 USCG 00 East Front House Door - 2021-01-06 19h37min40s.mp4		HIGHLY SENSITIVE
266O-LS-3374791 0000015 Import.pdf	Damage Cost Estimate	HIGHLY SENSITIVE
266O-LS-3374791 0000016 1A0000004 0000001 PHYSICAL.pdf	Cover Page	HIGHLY SENSITIVE
266O-LS-3374791 0000032 Import.pdf	Video Index	HIGHLY SENSITIVE

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 the defendant disclose prior statements of any witnesses defendant 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 with materials relating to government witnesses.

I will forward additional discovery as it becomes available. In the meantime, please let me know if there are any categories of information that you believe are particularly relevant to your client. If you have any questions, please feel free to contact me.

Sincerely,

/s/ Alison B. Prout

Alison B. Prout

Assistant United States Attorney

cc: Douglas Barker, Federal Defenders Office