

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA	:	Case No.: 21-cr-502-CKK
	:	
v.	:	
	:	
DANIEL CHRISTMANN,	:	
Defendant.	:	

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**NOTICE OF FILING DISCOVERY CORRESPONDENCE**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby files its August 24, 2021, discovery letter, memorializing discovery sent on this same day, which is served as an attachment via ECF on counsel for Defendant.

Respectfully submitted,

CHANNING D. PHILLIPS  
Acting United States Attorney  
D.C. Bar No. 415793

By: s/ Monica A. Stump  
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U.S. Department of Justice

CHANNING D. PHILLIPS  
Acting United States Attorney

*District of Columbia*

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

August 24, 2021

**VIA EMAIL**

Allen H. Orenberg  
The Orenberg Law Firm, P.C.

Re: *United States v. Christmann*  
Case No. 21-cr-502-CKK  
Letter No. 1

Dear Mr. Orenberg:

This is to memorialize the following discovery sent you on **August 24, 2021** via USAFX. The disclosures contained the following information:

Surveillance reports, notes, photographs, and logs for March 19, 2021, May 23, 2021, May 24, 2021, May 25, 2021, May 26, 2021, May 27, 2021, May 28, 2021, May 30, 2021, May 31, 2021, June 2, 2021, June 4, 2021, June 13, 2021, June 14, 2021, June 15, 2021, June 16, 2021, June 17, 2021, June 18, 2021, June 21, 2021, June 22, 2021, June 23, 2021, June 24, 2021, June 25, 2021, June 28, 2021, June 29, 2021, June 30, 2021, July 1, 2021, July 23, 2021, July 25, 2021, and July 26, 2021  
Records from Google, Facebook, T-Mobile, eBay, Equifax, PayPal, Venmo, JP Morgan Chase, MoneyGram, Colonial Parking, Inc., Facebook, Robinhood  
Report of Interview of Daniel Christmann  
Three reports of financial transactions  
Case opening report  
Facial image reports  
Investigation lead and Subject detail report  
Records checks, including residences, criminal history, and driver's licenses  
Identifying information report  
Meeting report of Daniel Christmann  
Preservation requests to Google (two), Facebook (two), T-Mobile,  
Image and Name search reports  
Location map and data for January 6

Two reports on Daniel Christmann inside the Capitol including closed captioning video and images  
Facebook and Instagram search warrant documents and returns  
Driver's license records for Tennessee, California, and New York  
Registration materials for Audi  
Site survey report  
License plate checks  
Arrest warrant and complaint  
Search warrant execution reports for residence, devices, and vehicle, lists of items seized, room labels, sketch of residence, execution log, evidence collection log, photographic log, receipt for property, photographs, and sign in log.  
Arrest and interview reports, including waiver form, photograph, and timeline  
Fingerprint card, booking information, and arrest photographs  
GPS location information search warrant documentation  
Tip report  
Call with L.W.  
Phone pictures and messages involving L.W.

The file names for these disclosures are listed in Attachment A to this letter.

Due to the extraordinary nature of the January 6, 2021 Capitol Attack, the government anticipates that a large volume of materials may contain information relevant to this prosecution. These materials may include, but are not limited to, surveillance video, statements of similarly situated defendants, forensic searches of electronic devices and social media accounts of similarly situated defendants, and citizen tips. The government is working to develop a system that will facilitate access to these materials. In the meantime, please let me know if there are any categories of information that you believe are particularly relevant to your client.

The discovery is unencrypted. Please contact me if you have any issues accessing the information, and to confer regarding pretrial discovery as provided in Fed. R. Crim. P. 16.1.

This material is subject to the terms of the Protective Order issued in this case.

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

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 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). I 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, I 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.

I will forward additional discovery as it becomes available. If you have any questions, please feel free to contact me.

Sincerely,

*/s/ Monica A. Stump*

Monica A. Stump  
Assistant United States Attorney

Enclosure(s)

**ATTACHMENT A**

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