

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

UNITED STATES OF AMERICA :
 : **1:21-cr-00190-DLF**
 v. :
 :
 ZACHARY JORDAN ALAM :
 :
 Defendant. :

NOTICE OF DISCOVERY

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby informs the Court and defense that the attached discovery letter of June 11, 2021, was provided to defense counsel in this matter.

Respectfully submitted,

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



By:

Candice C. Wong
Assistant United States Attorney
D.C. Bar No. 990903
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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*

June 11, 2021

Via Email

Michael E. Lawlor
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Counsel for Zachary Jordan Alam

Re: *United States v. Zachary Jordan Alam*
Case No. 1:21-cr-00190-DLF

Dear Counsel:

Enclosed as additional discovery in this case, via filesharing, are the following materials:

1. Jail calls (x35, zipped in 3 files)
2. Search warrant for devices and Search Warrant return
3. Additional search warrant photos from Special Agent Armor
4. Excerpts from search warrant item number 1B8

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.

These materials are subject to the Protective Order entered in this case. Please adhere to sensitivity markings.

I will forward additional discovery as it becomes available. 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.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Candice", written over a horizontal line.

Candice C. Wong
Assistant United States Attorney
202-252-7849
Candice.wong@usdoj.gov