

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

UNITED STATES OF AMERICA

v.

DANIEL RODRIGUEZ,

Defendant.

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CASE NO. 21-cr-246 (ABJ)

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 July 15, 2021, has been provided to the defense in this matter.

Respectfully submitted,

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

By:

/s/

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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*

July 15, 2021


















































Paul Riddle
Brandon Jaroch
Assistant Federal Public Defenders
Federal Public Defender
District of Nevada
Attorneys for Daniel Rodriguez


















































Re: *United States v. Daniel Rodriguez*
Case No. 21-CR-246
Discovery Letter #2


















































Dear Counsel:













We are writing to update you with additional discovery that has been provided for this case on July 15, 2021 via a shared folder on USA File Exchange, that contains the following materials:

- **FBI Documents Folder:**

-  266T-LA-3376038_0000001.pdf
 -  266T-LA-3376038_0000001_1A0000001_0000001.xspf
 -  266T-LA-3376038_0000001_1A0000002_0000001.PNG
 -  266T-LA-3376038_0000001_1A0000003_0000001.pdf
 -  266T-LA-3376038_0000001_1A0000004_0000001.pdf
 -  266T-LA-3376038_1A0000068_0000001.pdf
 -  266T-LA-3376038_1A0000069_0000001.pdf
 -  266T-LA-3376038_1A0011311_0000001.pdf
 -  266T-LA-3376038_0000002.pdf
 -  266T-LA-3376038_0000002_1A0000005_0000001.pdf
 -  266T-LA-3376038_0000003.pdf
 -  266T-LA-3376038_0000003_1A0000006_0000001.msg
 -  266T-LA-3376038_0000005.pdf
 -  266T-LA-3376038_0000005_1A0000008_0000001.zip
 -  266T-LA-3376038_0000008.pdf
 -  266T-LA-3376038_0000008_1A0004911_0000001.mp4
 -  266T-LA-3376038_0000010_1A0005249_0000001.pdf
 -  266T-LA-3376038_0000010_Redacted.pdf
 -  266T-LA-3376038_0000011.pdf
 -  266T-LA-3376038_0000011_1A0005251_0000001.msg
 -  266T-LA-3376038_0000013.pdf
 -  266T-LA-3376038_0000013_1A0000012_0000001.jpg
 -  266T-LA-3376038_0000013_1A0000012_0000002.jpg
 -  266T-LA-3376038_0000013_1A0000012_0000003.jpg
 -  266T-LA-3376038_0000013_1A0000012_0000004.jpg
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-  266T-LA-3376038_0000019.pdf
 -  266T-LA-3376038_0000019_1A0000017_0000001.pdf
 -  266T-LA-3376038_0000019_1A0000017_0000002.pdf
 -  266T-LA-3376038_0000019_1A0000017_0000003.pdf
 -  266T-LA-3376038_0000019_1A0000017_0000004.pdf
 -  266T-LA-3376038_0000019_1A0000017_0000005.pdf
 -  266T-LA-3376038_0000035.pdf
 -  266T-LA-3376038_0000039.pdf
 -  266T-LA-3376038_0000039_1A0000029_0000001_PHYSICAL.pdf
 -  266T-LA-3376038_0000039_1A0000029_0000002.jpeg
 -  266T-LA-3376038_0000046.pdf
 -  266T-LA-3376038_0000046_1A0000035_0000001.docx
 -  266T-LA-3376038_0000057.pdf
 -  266T-LA-3376038_0000057_1A0000041_0000001.pdf
 -  266T-LA-3376038_0000057_1A0000041_0000002.pdf
 -  266T-LA-3376038_0000066.pdf
 -  266T-LA-3376038_0000066_1A0000048_0000001_Redacted.pdf
 -  266T-LA-3376038_0000066_1A0000048_0000002_Redacted.pdf
 -  266T-LA-3376038_0000066_1A0000048_0000003.pdf
 -  266T-LA-3376038_0000078.pdf
 -  266T-LA-3376038_0000078_1A0000048_0000001.jpg
 -  266T-LA-3376038_0000078_1A0000048_0000002.jpg
 -  266T-LA-3376038_0000078_1A0000048_0000003.jpg
 -  266T-LA-3376038_0000078_1A0000048_0000004.jpg

 266T-LA-3376038_0000078_1A0000048_0000005.jpg
 266T-LA-3376038_0000081.pdf
 266T-LA-3376038_0000081_1A0000049_0000001.msg
 266T-LA-3376038_0000082_1A0000050_0000001.pdf
 266T-LA-3376038_0000082_Redacted.pdf
 266T-LA-3376038_0000084.pdf
 266T-LA-3376038_0000085_1A0000051_0000001.jpg
 266T-LA-3376038_0000085_1A0000051_0000002.jpg
 266T-LA-3376038_0000085_1A0000051_0000003.jpg
 266T-LA-3376038_0000085_Redacted.pdf
 266T-LA-3376038_0000089.pdf
 266T-LA-3376038_0000089_1A0000053_0000001.pdf
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 266T-LA-3376038_0000092.pdf
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 266T-LA-3376038_0000095.pdf
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 266T-LA-3376038_0000113.pdf
 266T-LA-3376038_0000114.pdf
 266T-LA-3376038_0000115.pdf
 266T-LA-3376038_0000115_1A0000064_0000001.pdf
 266T-LA-3376038_0000115_1A0000064_0000002_PHYSICAL.pdf
 266T-LA-3376038_0000115_1A0000064_0000003.pdf
 266T-LA-3376038_0000115_1A0000064_0000003.pdf
 266T-LA-3376038_0000115_1A0000064_0000004_PHYSICAL.pdf
 266T-LA-3376038_0000115_1A0000064_0000005.pdf
 266T-LA-3376038_0000116.pdf
 266T-LA-3376038_0000116_1A0000065_0000001.pdf
 266T-LA-3376038_0000116_1A0000066_0000001.MP3
 266T-LA-3376038_0000117.pdf
 266T-LA-3376038_0000118.pdf
 266T-LA-3376038_0000118_1A0000068_0000001.pdf
 266T-LA-3376038_0000118_1A0000069_0000001.pdf
 266T-LA-3376038_0000119.pdf
 266T-LA-3376038_0000119_1A0000070_0000001.pdf
 266T-LA-3376038_0000120.pdf
 266T-LA-3376038_0000120_0000001_Redacted.pdf
 266T-LA-3376038_0000121_1A0000042_0000001.mp4
 266T-LA-3376038_0000126.pdf
 266T-LA-3376038_0000127_1A0000075_0000001.png
 266T-LA-3376038_0000127_1A0000075_0000002.PNG
 266T-LA-3376038_0000127_1A0000075_0000003.PNG
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 266T-LA-3376038_0000127_1A0000075_0000005.png
 266T-LA-3376038_0000127_1A0000075_0000006.png
 266T-LA-3376038_0000127_Redacted.pdf
 266T-LA-3376038_0000129.pdf
 266T-LA-3376038_0000129_1A0000076_0000001.jpg

-  266T-LA-3376038_0000129_1A0000076_0000002.jpg
-  266T-LA-3376038_0000129_1A0000076_0000003.jpg
-  266T-LA-3376038_0000129_1A0000076_0000004.pdf
-  266T-LA-3376038_0000131_1A0000078_0000001.pdf
-  266T-LA-3376038_0000131_1A0000078_0000002.pdf
-  266T-LA-3376038_0000138_1A0000080_0000001.jpg
-  266T-LA-3376038_0000138_1A0000080_0000002.jpg
-  266T-LA-3376038_0000138_1A0000080_0000003.jpg
-  266T-LA-3376038_0000138_1A0000080_0000004.jpg
-  266T-LA-3376038_0000138_1A0000080_0000005.jpg
-  266T-LA-3376038_0000138_Redacted.pdf
-  266T-LA-3376038_0000139_1A0000081_0000001.jpg
-  266T-LA-3376038_0000139_1A0000081_0000002.jpg
-  266T-LA-3376038_0000139_1A0000081_0000003.jpg
-  266T-LA-3376038_0000139_1A0000081_0000004.jpg
-  266T-LA-3376038_0000139_1A0000081_0000005.jpg
-  266T-LA-3376038_0000139_1A0000081_0000006.jpg
-  266T-LA-3376038_0000139_1A0000081_0000007.jpg
-  266T-LA-3376038_0000139_Redacted.pdf
-  266T-LA-3376038_0000144_1A0000085_0000001.zip
-  266T-LA-3376038_0000144_Redacted.pdf
-  266T-LA-3376038_0000149.pdf
-  266T-LA-3376038_0000149_1A0000090_0000001.pdf
-  266T-LA-3376038_0000158_1A0000096_0000001.pdf
-  266T-LA-3376038_0000163_Redacted.pdf
-  266T-LA-3376038-FISUR_0000001.pdf
-  266T-LA-3376038-FISUR_0000001_1A0000001_0000001.docx
-  266T-LA-3376038-FISUR_0000007.pdf
-  266T-LA-3376038-FISUR_0000010.pdf
-  266T-LA-3376038-FISUR_0000010_1A0000008_0000001.pdf
-  266T-LA-3376038-FISUR_0000013.pdf
-  266T-LA-3376038-FISUR_0000013_1A0000010_0000001.pdf
-  266T-LA-3376038-FISUR_0000015.pdf
-  266T-LA-3376038-FISUR_0000015_1A0000004_0000001.pdf
-  266T-LA-3376038-FISUR_0000016.pdf
-  266T-LA-3376038-FISUR_0000016_1A0000011_0000001.docx
-  266T-LA-3376038-FISUR_0000017.pdf
-  266T-LA-3376038-FISUR_0000017_1A0000012_0000001.pdf
-  266T-LA-3376038-FISUR_0000017_1A0000013_0000001.JPG
-  266T-LA-3376038-FISUR_0000017_1A0000013_0000002.JPG
-  266T-LA-3376038-FISUR_0000017_1A0000013_0000003.pdf
-  266T-LA-3376038-FISUR_0000018.pdf
-  266T-LA-3376038-FISUR_0000020.pdf
-  266T-LA-3376038-FISUR_0000021.pdf
-  266T-LA-3376038-FISUR_0000021_1A0000015_0000001.pdf
-  266T-LA-3376038-GJ_0000007.pdf
-  266T-LA-3376038-GJ_0000007_1A0000007_0000001.zip
-  266T-LA-3376038-GJ_0000008_1A0000008_0000002.docx
-  266T-LA-3376038-GJ_0000009.pdf

-  266T-LA-3376038-GJ_0000009_1A0000009_0000001.pdf
-  266T-LA-3376038-GJ_0000009_1A0000009_0000002.pdf
-  266T-LA-3376038-GJ_0000010.pdf
-  266T-LA-3376038-GJ_0000010_1A0000010_0000001.xls
-  266T-LA-3376038-GJ_0000016.pdf
-  266T-LA-3376038-GJ_0000016_1A0000016_0000001.pdf
-  266T-LA-3376038-GJ_0000016_1A0000016_0000002.pdf
-  266T-LA-3376038-GJ_0000022_1A0000022_0000001.xlsx
-  266T-LA-3376038-GJ_0000028.pdf
-  266T-LA-3376038-GJ_0000028_1A0000025_0000001.zip
-  266T-LA-3376038-GJ_0000029.pdf
-  266T-LA-3376038-GJ_0000029_1A0000026_0000001.zip

- **Grand Jury Materials Folder:**

- Two PDFs of grand jury transcripts: 03.10.21 and 03.24.21
- Grand Jury Exhibits 1-21, except Exhibit 7
















Please note that the following materials have been designated as **highly sensitive materials** and are subject to the Protective Order Governing Discovery that was issued by the Court in each case:

- **Highly Sensitive Materials Folder:**

- Grand Jury Exhibit 7
- Memorandum from Architect of the Capitol

Please note that the following materials have been designated as **sensitive materials** and are subject to the Protective Order Governing Discovery that was issued by the Court in each case:

- **Sensitive Materials Folder:**

-  266T-LA-3376038_0000118.pdf
-  266T-LA-3376038_0000118_1A0000068_0000001.pdf
-  266T-LA-3376038_0000118_1A0000069_0000001.pdf
-  266T-LA-3376038_0000120.pdf
-  266T-LA-3376038_0000129.pdf
-  266T-LA-3376038_0000129_1A0000076_0000001.jpg
-  266T-LA-3376038_0000129_1A0000076_0000002.jpg
-  266T-LA-3376038_0000129_1A0000076_0000003.jpg
-  266T-LA-3376038_0000129_1A0000076_0000004.pdf
-  266T-LA-3376038-FISUR_0000016.pdf
-  266T-LA-3376038-FISUR_0000016_1A0000011_0000001.docx
-  266T-LA-3376038-GJ_0000008_1A0000008_0000002.docx
-  266T-LA-3376038-GJ_0000009.pdf
-  266T-LA-3376038-GJ_0000009_1A0000009_0000001.pdf
-  266T-LA-3376038-GJ_0000009_1A0000009_0000002.pdf

- **Body Worn Camera Materials**

In addition, pursuant to our discovery obligations, we are providing download links to 111 body worn camera (“BWC”) files listed in the Excel spreadsheet that was provided to you today via email. The links should last for a year, please download before then.

Please note that this list is *over-inclusive*, as it includes potentially relevant BWC videos for this and other Lower West Terrace related cases. Out of an abundance of caution, we are making all of these BWC videos accessible to the defense so that you can analyze whether they might be relevant to your defense.

We continue to identify additional BWC related to the Lower West Terrace and will provide an additional round of potentially relevant BWC. To the extent you identify other officers with BWC that you believe might be relevant to the case, please let us know and we will do what we can to provide that BWC if it exists. In addition, my understanding is that the office is working to develop a system to make BWC available on a broader level in the coming months.

We will forward additional discovery as it becomes available. If you have any questions about the information provided above or if you have any issues accessing or downloading the materials provided, please contact the undersigned Assistant United States Attorneys.

Sincerely,

TARA RAVINDRA
RISA BERKOWER
KIMBERLY PASCHALL
Assistant United States Attorneys

Enclosures