

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-175 (TJK)
	:	
ETHAN NORDEAN,	:	
also known as “Rufio Panman,”	:	
JOSEPH BIGGS,	:	
ZACHARY REHL, and	:	
CHARLES DONOHOE,	:	
	:	
Defendants.	:	

GOVERNMENT’S NOTICE REGARDING DISCOVERY CORRESPONDENCE

The United States of America, by and through undersigned counsel, respectfully submits this notice of recent correspondence to defense counsel regarding discovery productions. Filed as attachments to this notice are three letters. The first reflects the production of certain media files capturing events on January 6, 2021, that were obtained by the government during its investigation. The second and third reflect “cross-discovery” from other cases—that is, discovery that is related to defendants not charged in this case but that is nonetheless relevant here. The attachments include the following:

Attachment	Date	Recipients and Content
1	9/21/2021	Counsel for All Defendants (hard drive with electronic media)
2	10/15/2021	Counsel for All Defendants (cross-discovery from <i>U.S. v. Jackman et al.</i> , 21-cr-378)
3	10/20/2021	Counsel for All Defendants (cross discovery from <i>U.S. v. Pezzola et al.</i> , 21-cr-52)

In addition to the above productions, the government has provided several detailed letters to all counsel regarding the government’s efforts to provide discovery across all Capitol Riot cases, including descriptions of the materials that have been made available. That correspondence, which is not attached, includes the following:

