

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

UNITED STATES OF AMERICA

v.

ANTHONY PUMA,

Defendant

Case No.: 21-cr-454

GOVERNMENT'S NOTICE OF DISCOVERY

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully gives notice that undersigned counsel for the government has provided counsel, for the defendant, discovery in the above-mentioned case as outlined in the government's attached discovery letter dated November 5, 2021.

Respectfully submitted,

Matthew Graves
United States Attorney
D.C. Bar No. 481052

By: /s// Amy E. Larson

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U.S. Department of Justice

Matthew Graves
United States Attorney

District of Columbia

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

November 5, 2021

Maria N. Jacob
Assistant Federal Public Defender
Office of the Federal Public Defender
for the District of Columbia
625 Indiana Avenue, N.W. Suite 550
Washington, D.C. 20004

Re: *United States v. Anthony Puma*
Case No. 21-mj-447

Dear Counsel:

We have provided, via USAF_x, preliminary discovery in this case that contains the following materials:

0176-DE-3369044-GJ_0000007_Redacted.pdf
Puma-Aubertin Subpoena - Declaration-signed.pdf
Aubertin - 85975445 - 50795.pdf
0176-DE-3369044-GJ_0000008_Redacted.pdf
0176-DE-3369044-GJ_0000009.pdf
2.zip
0176-DE-3369044-GJ_0000010.pdf
0176-DE-3369044-GJ_0000010_1A0000011_0000001.pdf
0176-DE-3369044_0000029.pdf
0176-DE-3369044_0000029_1A0000023_0000001.pdf
0176-DE-3369044_0000030.pdf
0176-DE-3369044_0000030_1A0000024_0000002.pdf
0176-DE-3369044_0000031_Redacted.pdf
0176-DE-3369044_0000032_Redacted.pdf
0176-DE-3369044_0000033.pdf

0176-DE-3369044_0000034.pdf
0176-DE-3369044_0000035_1A0000005_0000001.pdf
0176-DE-3369044_0000036_1A0000028_0000001.zip
0176-DE-3369044_0000036_1A0000028_0000003.zip
0176-DE-3369044_0000036_1A0000028_0000002.zip
0176-DE-3369044_0000039.pdf
0176-DE-3369044_0000040.pdf
0176-DE-3369044_0000040_1A0000032_0000002.pdf
0176-DE-3369044_0000041.pdf
0176-DE-3369044_0000041_1A0000033_0000001.pdf
0176-DE-3369044_0000044_Redacted.pdf
0176-DE-3369044_0000045_Redacted.pdf
0176-DE-3369044_0000046.pdf
0176-DE-3369044_0000047.pdf

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. As you know, to date, there have been 7 discovery productions that contain these types of materials.

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. 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//Amy E. Larson

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