

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____	:	
UNITED STATES OF AMERICA	:	No.: 21-CR-42 (ABJ)
	:	
v.	:	
	:	
ANDREW WRIGLEY,	:	
Defendant.	:	
_____	:	

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 June 10, 2021 discovery letter, memorializing discovery sent March 26, May 27 and June 3, 2021, which is served as an attachment via ECF on counsel for the Defendant.

Respectfully submitted,

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

By: /s/ Mona Lee M. Furst
Mona Lee M. Furst
Assistant United States Attorney
Detailee – Federal Major Crimes
United States Attorney’s Office
District of Columbia
Cell No. (316) 213-7420
Kansas Bar Number 13162
Mona.Furst@usdoj.gov

CERTIFICATE OF SERVICE

On this 10th day of June, 2021, a copy of the foregoing was served on counsel of record for the defendant via the Court’s Electronic Filing System.

/s/Mona Lee M. Furst
Mona Lee M. Furst
Assistant United States Attorney



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 10, 2021

Ann C. Flannery
Law Offices of Ann C. Flannery, LLC
1835 Market Street, Suite 2700
Philadelphia, PA 19103

Re: *United States v. Andrew Wrigley*
Case No. 21-cr-42-ABJ

Dear Counsel:

This is to memorialize the following initial discovery 1 emailed to you on March 26, 2021:

- Criminal Complaint- "21-mj-26 SIGNED Criminal Complaint (Redacted).pdf"
- Arrest Warrant- "21-mj-26 SIGNED Arrest Warrant.pdf"
- Statement of Facts (for Criminal Complaint)- "21-mj-26 SIGNED Statement of Facts.pdf"
- Executed Arrest Warrant- "Executed Arrest Warrant.pdf"
- Information- "Information_ECF No. 3.pdf"
- Defendant's Pretrial Services Report- "Wrigley-PSR.pdf"
- Search Warrant and Affidavit (Facebook/Instagram) (21-sc-680)- "signed-21-sc680 Search Warrant ECF No. 1.pdf"
- Exhibits (3) provided by Andrew Wrigley at Initial Appearance in Pennsylvania (3—"Wrigley Exhibit 1.pdf", "Wrigley Exhibit 2.pdf", "Wrigley Exhibit 3.pdf")
- Photos taken by/provided by US Capitol Police Investigator (Folder "Capitol Investigator Photos")
- Instagram Photo Captures by US Capitol Police Investigator (Folder "Instagram Photo Captures (US Capitol Police)")
- FBI Case Intake 302 ("wrigl.pdf")

Initial discovery 2 provided via USAFX on May 27, 2021:

- MXU tips Serial 9, Serial 10 and Serial 17

- Tips Serial 18 and Serial 19
- Witness interview, Serial 2 and Serial 5
- Two MOIs of interview, Serial 3 (redacted) with two attachments, Serial 3_1A0000290_001 and _002
- Executed arrest warrant Serial 16 (redacted)

Initial discovery 3 provided via USAFX on June 3, 2021:

- Facebook search warrant
- Facebook return
- Instagram return

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.

Additional materials are provided since the Protective Order is in place.

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/ Mona Lee M. Furst

Mona Lee M. Furst
Assistant United States Attorney

Enclosure(s)

cc: