

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

**UNITED STATES OF AMERICA**

**v.**

**STEPHEN AYRES and  
MATTHEW PERNA,**

**Defendants.**

:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

**Criminal Case No. 21-CR-156 (JDB)**

**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 March 11, 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/ Nihar Mohanty  
NIHAR MOHANTY  
D.C. Bar No. 436-686  
Assistant United States Attorney  
555 4<sup>th</sup> Street, N.W.  
Washington, DC 20530  
(202) 252-7700  
[Nihar.Mohanty@usdoj.gov](mailto:Nihar.Mohanty@usdoj.gov)



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*

March 11, 2021

***Via USAfx***

Eugene Ohm (Counsel for defendant Ayres)  
FPDS



J. Gerald Ingram (Counsel for defendant Perna)  
Ingram, Cassese & Grim, LLP.



Dear Counsel,

RE: *U.S. v. Stephen Ayres and Matthew Perna*  
Case No. 21-CR-156 (JDB)

Pursuant to your discovery request in the above-referenced case, the following materials are being provided to you via the USAfx file-sharing system:

1. Criminal Complaint with Statement of Facts for Stephen Ayres, 18 pages;
2. Criminal Complaint with Statement of Facts for Matthew Perna, 6 pages;
3. Indictment, 3 pages;
4. FBI 302 re: Matthew Perna, dated 1/14/2021, 3 pages;
5. FBI 302 re: Matthew Perna, dated 1/14/2021, 1 page;
6. FBI 302 re: Stephen Ayres, dated 1/27/2021, 2 pages;
7. Screenshots re: Matthew Perna, 24 photos;
8. Screenshots re: Stephen Ayres, 20 photos;
9. Screenshots (Cropped), 7 photos;
10. Screenshots from U.S. Capitol Police, 2 photos;
11. Screenshots provided by W-1, 6 photos;
12. Facebook, Screenshots (PDF) – Stephen Ayres, 9 pages;
13. Facebook, Screenshots (PDF) – Stephen Ayres, 22 pages;
14. Facebook, Screenshots (PDF) – Stephen Ayres, 7 pages;

15. Photo from Matthew Perna's Facebook provided by W-1, 1 photo;
16. DMV photo of Stephen Ayres, shown to W-1, 1 photo;
17. YouTube Video – Stephen Ayres, dated 01/07/2021;
18. Custodial Interview of Stephen Ayres;
19. Instagram response, 5 pages;
20. Facebook return re: Stephen Ayres, 1,541 pages;
21. Facebook return (linked media) re: Stephen Ayres.

Thank you in advance for your attention to this matter. If you have questions or concerns, contact me at your convenience.

Sincerely,

CHANNING D. PHILLIPS  
Acting United States Attorney

By: /s/ Nihar Mohanty  
Nihar Mohanty  
Assistant United States Attorney  
555 4<sup>th</sup> Street, NW  
Washington, D.C. 20530  
(202) 252-7700 (office)  
[Nihar.Mohanty@usdoj.gov](mailto:Nihar.Mohanty@usdoj.gov)