

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

**UNITED STATES OF AMERICA**

**v.**

**DARYL JOHNSON and  
DANIEL JOHNSON,**

**Defendants.**

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**Criminal No. 21-cr-407 (DLF)**

UNITED STATES' NOTICE OF FILING

The United States requests that the attached discovery letter, dated September 2, 2021, be made a part of the record in this case.

Respectfully submitted,

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

By:



\_\_\_\_\_  
Laura E. Hill  
Trial Attorney, detailed to the  
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U.S. Department of Justice

Channing D. Phillips  
Acting United States Attorney

*District of Columbia*

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

September 2, 2021

Allen Orenberg  
The Orenberg Law Firm, P.C.  
12505 Park Potomac Avenue  
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Thomas Abbenante  
888 17th Street, NW  
Suite 1200  
Washington, D.C. 20006

Re: *United States v. Daryl Johnson and Daniel Johnson*  
Case No. 21-cr-407

Dear Counsel:

Additional discovery in this case is now available on USAFx and includes the following materials:

- File folder named Second Production. This folder includes a total of 130 files. This folder contains two subfolders:

1) Sensitive, which contains the following 19 files that are Sensitive pursuant to the terms of the Protective Order; and

File Name
0176-MP-3404566_0000001_Redacted
0176-MP-3404566_0000001_1A0000001_0000001_Redacted.pdf
0176-MP-3404566_0000002_Redacted
0176-MP-3404566_0000007_Redacted
0176-MP-3404566_0000008_1A0008938_0000001_Redacted

0176-MP-3404566_000009_1A000002_000001
0176-MP-3404566_000009_Redacted
0176-MP-3404566_000027
0176-MP-3404566_000027_Import_Redacted
0176-MP-3404566_000028
0176-MP-3404566_000028_Import_Redacted
0176-MP-3404566_000035_1A000021_000001_Redacted
0176-MP-3404566_000035_Redacted
0176-MP-3404566_000036_1A000022_000003_Redacted
0176-MP-3404566_000036_Redacted
0176-MP-3404566_000048_1A000034_000001_Redacted
0176-MP-3404566_000050_1A000039_000003
0176-MP-3404566_000052
0176-MP-3404566_000052_Import_Redacted

3) No Sensitivity Designation, containing the following 111 files.

File Name
0176-MP-3404566_000001_1A000001_000002
0176-MP-3404566_000003_Redacted
0176-MP-3404566_000004_1A000075_000001_Redacted
0176-MP-3404566_000004_Redacted
0176-MP-3404566_000005_Redacted
0176-MP-3404566_000006_Redacted
0176-MP-3404566_000006_1A0001873_000001.zip
0176-MP-3404566_000007_1A0012614_000001_Redacted
0176-MP-3404566_000008_Redacted
0176-MP-3404566_000010_1A000001
0176-MP-3404566_000010_1A000003_000001
0176-MP-3404566_000010_Redacted
0176-MP-3404566_000011_1A000005_000001
0176-MP-3404566_000011_1A000005_000002
0176-MP-3404566_000011_1A000006_000001
0176-MP-3404566_000011_1A000006_000002
0176-MP-3404566_000011_Redacted
0176-MP-3404566_000014
0176-MP-3404566_000014_1A000009_000001_Redacted
0176-MP-3404566_000015
0176-MP-3404566_000015_1A000010_000001
0176-MP-3404566_000015_1A000010_000002

0176-MP-3404566_0000015_1A0000010_0000003
0176-MP-3404566_0000015_1A0000010_0000004
0176-MP-3404566_0000015_1A0000010_0000005
0176-MP-3404566_0000015_1A0000010_0000006
0176-MP-3404566_0000015_1A0000010_0000007
0176-MP-3404566_0000015_1A0000010_0000008
0176-MP-3404566_0000015_1A0000010_0000009
0176-MP-3404566_0000016_1A0000011_0000001_Redacted
0176-MP-3404566_0000016_Redacted
0176-MP-3404566_0000017_1A0000012_0000001_Redacted
0176-MP-3404566_0000017_Redacted
0176-MP-3404566_0000018
0176-MP-3404566_0000018_1A0000013_0000001
0176-MP-3404566_0000020
0176-MP-3404566_0000020_1A0000014_0000001
0176-MP-3404566_0000020_1A0000014_0000002
0176-MP-3404566_0000024_Import
0176-MP-3404566_0000026_1A0000015_0000002
0176-MP-3404566_0000026_1A0000015_0000003
0176-MP-3404566_0000026_Redacted
0176-MP-3404566_0000029
0176-MP-3404566_0000029_1A0000016_0000001
0176-MP-3404566_0000029_Import_Redacted
0176-MP-3404566_0000030
0176-MP-3404566_0000030_1A0000017_0000001
0176-MP-3404566_0000030_1A0000017_0000002
0176-MP-3404566_0000031
0176-MP-3404566_0000031_1A0000018_0000001
0176-MP-3404566_0000034
0176-MP-3404566_0000034_1A0000020_0000001_Redacted
0176-MP-3404566_0000034_1A0000020_0000002
0176-MP-3404566_0000034_1A0000020_0000003_Redacted
0176-MP-3404566_0000034_1A0000020_0000004
0176-MP-3404566_0000034_1A0000020_0000005
0176-MP-3404566_0000034_1A0000020_0000006_Redacted
0176-MP-3404566_0000037_Redacted
0176-MP-3404566_0000038_1A0000023_0000001_Redacted
0176-MP-3404566_0000038_Redacted
0176-MP-3404566_0000039

0176-MP-3404566_0000039_1A0000024_0000001_Redacted
0176-MP-3404566_0000040
0176-MP-3404566_0000040_1A0000025_0000001
0176-MP-3404566_0000042
0176-MP-3404566_0000043
0176-MP-3404566_0000044_1A0000027_0000001
0176-MP-3404566_0000044_1A0000027_0000002
0176-MP-3404566_0000044_1A0000028_0000001
0176-MP-3404566_0000044_1A0000028_0000002
0176-MP-3404566_0000044_1A0000029_0000001
0176-MP-3404566_0000044_1A0000029_0000002_Redacted
0176-MP-3404566_0000044_Redacted
0176-MP-3404566_0000045
0176-MP-3404566_0000045_1A0000030_0000001
0176-MP-3404566_0000045_1A0000031_0000001
0176-MP-3404566_0000045_1A0000032_0000001
0176-MP-3404566_0000046
0176-MP-3404566_0000047
0176-MP-3404566_0000047_1A0000033_0000001
0176-MP-3404566_0000048
0176-MP-3404566_0000050
0176-MP-3404566_0000050_1A0000036_0000001
0176-MP-3404566_0000050_1A0000036_0000002
0176-MP-3404566_0000050_1A0000036_0000003
0176-MP-3404566_0000050_1A0000036_0000004
0176-MP-3404566_0000050_1A0000036_0000005
0176-MP-3404566_0000050_1A0000037_0000001
0176-MP-3404566_0000050_1A0000037_0000002
0176-MP-3404566_0000050_1A0000037_0000003
0176-MP-3404566_0000050_1A0000037_0000004
0176-MP-3404566_0000050_1A0000037_0000005
0176-MP-3404566_0000050_1A0000037_0000006
0176-MP-3404566_0000050_1A0000037_0000007
0176-MP-3404566_0000050_1A0000038_0000001
0176-MP-3404566_0000050_1A0000038_0000002
0176-MP-3404566_0000050_1A0000038_0000003
0176-MP-3404566_0000050_1A0000038_0000004
0176-MP-3404566_0000050_1A0000038_0000005
0176-MP-3404566_0000050_1A0000038_0000006

0176-MP-3404566_0000050_1A0000039_0000001
0176-MP-3404566_0000050_1A0000039_0000002
0176-MP-3404566_0000050_1A0000039_0000004
0176-MP-3404566_0000050_1A0000039_0000005
0176-MP-3404566_0000050_1A0000039_0000006
0176-MP-3404566_0000050_1A0000039_0000007
0176-MP-3404566_0000051
0176-MP-3404566_0000051_1A0000040_0000001
0176-MP-3404566_0000053
0176-MP-3404566_0000054
0176-MP-3404566_0000054_Import

This material is subject to the terms of the Protective Order issued in this case.

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 will forward additional discovery as it becomes available. If you have any questions, please feel free to contact me.

Sincerely,

/s/ Laura Hill

Laura E. Hill  
Trial Attorney, detailed to the  
District of Columbia