

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

UNITED STATES OF AMERICA	:	
	:	Case No. 21-cr-00053 (CJN)
	:	
v.	:	
	:	
EDWARD JACOB LANG	:	

NOTICE OF FILING

The government requests that the attached discovery letter, dated August 11, 2021, be made part of the record in this case.

Respectfully submitted,

CHANNING D. PHILLIPS
Acting United States Attorney

By: /s/ Melissa Jackson
Melissa Jackson
Assistant United States Attorney
United States Attorney's Office
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Washington, DC 20530
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Melissa.jackson@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*

August 11, 2021

VIA USAFX and e-mail

Marty Tankleff

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Steven A. Metcalf II

metcalflawnyc@gmail.com

Counsel for Edward Jacob Lang

Re: *United States v. Edward Lang
21-CR-53 - Production 9*

Dear Counsel:

Pursuant to our discovery obligations, we are providing the following files via USAfx:

- All of the files listed in the index in Exhibit A- which are the unscoped returns from two of his Instagram accounts.

(As with all files uploaded to USAfX, they automatically delete after 60 days per the automatic retention policy in place. Please download the files before then.)

Upcoming Discovery

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.

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.

By:





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Enclosure(s):
cc:

EXHIBIT A** > Instagram Search Warrant > 1495299308 (usapatriotmilita2)**

Name	Updated ▾	Size
 318552029967477.pdf	Today by Melissa Jackson	22.8 MB
 318552029967477.zip	Today by Melissa Jackson	45.9 MB
 1146524552495107_affidavit.pdf	Today by Melissa Jackson	84 KB

 > Instagram Search Warrant > 1480799392 (usapatriotmilitia)

Name	Updated ▾	Size
 568597934150999.pdf	Today by Melissa Jackson	480.5 MB
 568597934150999.zip	Today by Melissa Jackson	103.2 MB
 2771453269834676_affidavit.pdf	Today by Melissa Jackson	84 KB