



U.S. Department of Justice

Matthew M. Graves  
United States Attorney

*District of Columbia*

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

January 28, 2022

***Via Email and Electronic File Transfer***

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Re: *United States v. Ethan Nordean et al.*, Cr. No.: 21-cr-175 (TJK)

Dear Counsel:

I write to memorialize another production related to the above-captioned case as part of the government's efforts to produce preliminary discovery on an ongoing basis. Today the government produced search warrant returns from T-Mobile (SW 21-sc-2331) relating to T-Mobile account numbers associated with defendant Charles Donohoe and ten other individuals, whose names are listed in the returns. The production is contained in two zip files titled, "Filtered T-Mobile Production.zip" and "Filtered Text Records.zip".

The materials have been made available for download in the Cross Discovery folder on USAfx. They are designated SENSITIVE under the protective order, with the exception that the Donohoe returns are not sensitive as to Donohoe. Please let me know immediately if you have been unable to access and download the materials for your use in this case.

To assist our future productions of discovery, we would again request that you return external hard drives that we have supplied, once you have had an opportunity to copy the materials.

We understand that our discovery obligations are ongoing and intend to supplement our disclosures on a rolling basis. If you have any questions, please do not hesitate to contact us.

Sincerely yours,

MATTHEW M. GRAVES  
UNITED STATES ATTORNEY

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