



U.S. Department of Justice

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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, including discovery produced in other Capitol cases that may be relevant to your clients. Today the government produced materials from *United States v. Gabriel Garcia*, 21-cr-129.

The production is contained within a zip file accompanied by two discovery letters from the government to counsel for Mr. Garcia. For purposes of this cross-discovery, all of the materials are designated as at least Sensitive, primarily because they contain personal identification information (PII). Any materials produced to Mr. Garcia as Highly Sensitive are designated Highly Sensitive in this case as well. Excluded from this production are the Facebook materials and Phone Contacts referenced in the July 18, 2021, letter, as those materials had not been "scoped" and therefore cannot be produced except to Mr. Garcia.

