



U.S. Department of Justice

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*Judiciary Center
555 Fourth St., N.W.
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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:

In an effort to provide discovery to Ms. Hernandez, who was recently appointed to represent Mr. Rehl, we have compiled material previously produced to all counsel in this case in a single USAfx folder, which is titled "Cross Discovery." We have made the folder available to all of you for your convenience. You should have received an invitation to the USAfx folder, but we will also send a link by email. (Please note that the folder does not contain materials that were produced only to individual defendants—for example, unscoped copies of devices or accounts belonging to an individual defendant.)

The sub-folders within the Cross Discovery folder are labeled with a date, which reflects the initial production of the material in this case, and a descriptive title. The subfolders also contain production correspondence, including letters and emails, for your reference. (We would also refer

you to ECF 119, 180, and 216, as those filings memorialize prior discovery productions in this case.)

Please note that the Cross Discovery folder contains a new production as part of the government's efforts to produce preliminary discovery on an ongoing basis. That production includes a third round of FBI Sentinel files for each of the defendants (labeled "[defendant] Sentinel Files 3"). You previously received copies of the files from your client's FBI case file, and we are now cross-producing that material to the other defendants.

For your reference, below is a list of the folders in the Cross Discovery folder:

Folder Name (Date of Initial Production / Title)
2021-03-29 - Telegram 1-1494 and Videos 1495-99
2021-04-08 - Videos 00001545-00001555
2021-04-29 - Telegram 00002503 - 7649
2021-05-18 - Telegram 00007639 - 35924
2021-06-02 - CAPVID Videos
2021-06-03 - Nordean CCTV and AOC
2021-07-02 - Scoped Nordean Phone (via disc)
2021-07-09 - Grand Jury Subpoena Materials
2021-07-13 - Memorialization of Earlier Productions
2021-07-13 - Search Warrant Affidavits
2021-07-14 - Scoped Biggs Apple Return (via discs)
2021-07-28 - Biggs CCTV
2021-07-28 - Nordean CCTV
2021-07-28 - Nordean Serial 76 Videos
2021-07-29 - Scoped Nordean MacBook
2021-09-10 - Biggs Sentinel Files 2
2021-09-11 - Rehl Sentinel Files 2
2021-09-16 - Nordean Sentinel Files 2
2021-09-20 - Donohoe Sentinel Files 2
2021-09-20 - Memorializing Block Productions
2021-09-21 - NQ Video (via hard drives)
2021-10-15 - Cross Discovery from Jackman
2021-10-21 - Cross Discovery from Pezzola
2021-11-30 - Nordean Sentinel Files 3
2021-12-03 - Biggs Sentinel Files 3
2021-12-13 - Donohoe Sentinel Files 3
2021-12-14 - Rehl Sentinel Files 3

The materials described above have been made available for download on USAfx. Please keep in mind that all of the items placed in the USAfx case-folder will be deleted automatically –

some in as few as 60 days. 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,

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By: _____ /s/
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