

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

UNITED STATES OF AMERICA	:	No.: 21-CR-85-CRC-2
	:	
v.	:	
	:	
SIMONE GOLD,	:	
	:	
Defendant.	:	

NOTICE OF FILING DISCOVERY CORRESPONDENCE

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby files its July 12, 2021 discovery letter in this case, in reference to discovery produced in April 2021, which is hereby served as an attachment via ECF on counsel for the Defendant.

Respectfully submitted,

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

By: /s/ April H. Ayers-Perez
APRIL H. AYERS-PEREZ
Texas Bar No.: 24090975
Assistant United States Attorney
Detailee – Federal Major Crimes
United States Attorney’s Office
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Telephone No. (956) 754-0946
April.Perez@usdoj.gov

CERTIFICATE OF SERVICE

On this 12th day of July, 2021, a copy of the foregoing was served on counsel of record for the defendant via the Court's Electronic Filing System.

/s/ April H. Ayers-Perez

April H. Ayers-Perez

Assistant United States Attorney



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*

July 12, 2021

Kira West
LAW OFFICE OF KIRA WEST
712 H St., NE
Unit 509
Washington, DC 20002
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Dickson Young
WHITESTONE YOUNG, PC
10513 Judicial Drive
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Re: *United States v. Simone Gold*
Case No. 1:21-cr-00085-CRC-2

Dear Ms. West/Mr. Young:

In accordance with Rule 16 of the Federal Rules of Criminal Procedure, and as otherwise required by law (e.g., *Brady v. Maryland*, 373 U.S. 63 (1963), *United States v. Giglio*, 405 U.S. 150 (1972)), the Government has produced preliminary discovery through USAfx File no. 136032348143, contained within a folder entitled Gold 21CR85 Discovery. Preliminary discovery was originally uploaded to USAfx in this case on April 21, 2021.

The following documents have been shared via USAfx:

Serial No.	Document/Video/Photo
1	Case Opening Communication
1	Collage of Wanted Folks from Riot
1	News Article (Gold)

2	FBI Intake Report
3	FBI Intake Report – Gold Info Packet
3	POIs of Interest – 1.7.21
3	Gold Packet
4	Email Tip
4	External Email Tip
5	FBI Intake Report – Tip on Picture No. 21
6	FBI Intake Report – Original Message with Tip
7	FBI Intake Report – MPD Email Lead
7	External Email Tip
8	Affidavits, Complaint, and Arrest Warrant Report
8	Signed Strand_Gold Affidavit
8	Signed Strand_Gold Unredacted Criminal Complaint
8	Signed Strand_Gold Redacted Criminal Complaint
8	Signed Strand_Gold Affidavit Unredacted
8	Signed Strand_Gold Proposed Sealing
8	Signed Strand Arrest Warrant
8	Signed Gold Arrest Warrant
9	EC (FD-1057) Baseline Check for SIMONE GOLD
9	Gold Accurint Report
10	Photograph No. 21
10	Collage 03
10	Export Report 1
10	Simone Gold
10	EC (FD-1057) Database Checks Conducted for Simone Gold
11	Text Tip
11	External Email
12	EC (FD-1057) Information Regarding Photograph No. 21
12	Photo Collage
12	Video – 01:30
13	EC (FD-1057) Preservation Letters Regarding Simone Gold
14	Getty Images Video of John Strand and Simone Gold
14	Video of Officer – 01:30
15	FD-302 Interview of [Redacted]
15	[Redacted] Agent Notes
16	Email Tip in Reference to Simone Gold
17	Gold_WaPo Article Photo No. 2
17	Gold_WaPo Article Photo No. 1
17	Simone Gold
18	External Email
19	Interview of [Redacted]
20	FD-302 Interview of [Redacted]
20	Hospital ID Photo

21	FD-302 Interview of [Redacted]
21	External Email
21	[Redacted] Interview Notes
22	Text Tips
22	External Email
23	Text Tips
23	External Email
24	Capitol Police Video Received
24	Capitol Video of John Strand and Simone Gold
25	EC (FD-1057) Coverage of Lead 1903
25	Email re: Twitter Screenshots
25	Twitter Posts
26	External Email
26	Text Tips
27	External Email – MPD Tips
27	Photograph
27	Photograph
27	Photograph
27	#21 is Dr Simone Gold
28	FBI Intake Report on [Redacted]
29	FD-930 Simone Melissa Gold
30	EC (FD-1057) Search Warrants for Strand, Gold
30	21-mj-00270_Application_For_Warrant
30	21-mj-00270_Order_Sealing_Documents
30	21-mj-00270_Warrant_Individual_Gold
30	21-mj-00270_Ex_Parte_Application_Sealed
30	21-mj-00275_Warrant_Individual – Strand
30	21-mj-00275_Order_Sealing_Document
30	21-mj-00275_Application_For_Warrant
30	21-mj-00275_Ex_Parte_Application_Sealed
30	21-mj-00266_Application_For_Warrant
30	21-mj-00266_Warrant-CAR
30	21-mj-00266Ex_Parte_Application_Sealed
30	21-mj-00266_Order_Sealing_Document
30	Order_Sealing_Documents-Residence
30	Warrant-Residence
30	Ex_Parte_App_Sealing_Documents-Residence
30	Application_For_Warrant-Residence
31	Search of [Address Redacted]
32	Execution of Search Warrants for Strand and Gold
32	Administrative Worksheet
32	Photo Logs
32	Room Letters

32	Inventory
32	Sketch
32	Log
32	Sign in Log
32	Signed Search Warrants
32	Search Documentation
33	Transportation of Simone Gold
34	FD-302 Interview of [Redacted]
34	Video Simone Gold Speech – 00:47
35	FD-302 Transportation of Simone Gold
36	FD-302 Transportation of Simone Gold 2
37	FD-302 California Records Check for Simone Gold
37	Gold-CCHRS
37	Gold-Wants and Warrants
37	Gold-DL Photo
37	Gold-DMV
37	Gold-Vehicles Registered
37	Strand-DMV
41	FD-302
41	Strand Notification Letter-Signed
41	Gold Notification Letter-Signed
41	Formal Notification
46	FD-302 Arrest and Initial Appearances for John Strand and Simone Gold
46	Executed Warrant Strand
46	Executed Warrant Gold
46	Executed Arrest Warrants (Gold and Strand)
48	EC (FD-1057) Gold Selectors Spreadsheet (Telephone and Email)
48	Gold Selectors Spreadsheet
57	FD-302 Follow up Telephone Interview of [Redacted]
57	[Redacted] Interview Notes
58	Video and Article from KGET
58	KGET Simone Gold Article
58	KGET Simone Gold Video – 03:22
62	EC (FD-1057) Public Tip
63	FD-302 Attempted Interview of Simone Gold
67	FD-302 Capture of Twitter Video from [Redacted]
67	Twitter Video – 00:27
68	Email Communication and Interview of [Redacted]
68	[Redacted] Interview
69	EC (FD-1057) Indictment of John Strand and Simone Gold
69	File Stamped Indictment of John Strand and Simone Gold
70	FD-302 Imaging of two flash drives/thumb drives
71	Interviews of USCP Officer [Redacted] and [Redacted]

71	RE_Interview
71	Screenshot of Couple
71	Interview of [Redacted] and [Redacted]
74	Place Criminal History and Outstanding Warrant Check
84	Geofencing Results for [Redacted]
85	Propublica Parler Video
85	Video – 00:49
85	Propublica Screenshot – Gold and Strand
86	[Redacted] Twitter Posts
87	Comparison of [Redacted]
87	BOLO_Photo_21
88	Interview of [Redacted]
88	Image_151001
90	EC (FD-1057) Transcript of January 18, 2021 Transportation
90	Simone Gold Transport
94	FD-302 Interview of [Redacted]
94	Notes of Interview of [Redacted]
95	Text Tips
95	External Email – MPD Tips
96	Text Tips
96	Twitter Photograph – Simone Gold
96	Twitter Photograph – Simone Gold
98	EC (FD-1057) Arrest Warrant Obtained – Strand & Gold
98	Signed-Strand & Gold (unredacted) Criminal Complaint
98	Signed-Strand & Gold Proposed Sealing Order
98	Signed-Strand & Gold Affidavit (unredacted)
98	Signed-Strand Arrest Warrant
98	Signed-Gold Arrest Warrant
98	Signed-Strand & Gold Affidavit (redacted)
98	Signed-Strand & Gold (redacted) Criminal Complaint
101	Targeting Package for Simone Gold
102	Leads 9149 and 10066
103	Photo 21 possible [Redacted]
116	EC (FD-1057) Document the Identification of BOLO #21
117	Interview of [Redacted]
117	Photograph 1
117	Photograph 2
117	Photograph 3
117	Facebook Post 3
117	Facebook Post 1
117	Facebook Post 2
117	MPD Photo
117	MSNBC Photo

117	External Email [Redacted]
119	Interview of [Redacted]
119	[Redacted] Interview
119	[Redacted] Interview Notes
120	Interview of [Redacted]
120	[Redacted] FB_IMG
120	[Redacted] Screenshot 20210107
120	[Redacted] Screenshot 20210109
120	[Redacted] Email
130	EC (FD-1057) Lead Coverage
133	Video
1 FISUR	FISUR Request (FD-1054) Surveillance Request of John Strand and Simone Gold
2 FISUR	FISUR Log (FD-1055)
2 FISUR	FISUR Notes 1.16.2021
2 FISUR	Simone Gold Photograph
2 FISUR	John Strand Photograph
3 FISUR	FISUR Log (FD-1055)
3 FISUR	Surveillance Photograph Strand 1-17-21
2 INTELPRODS	EC (FD-1057) Simone Melissa Gold Card

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 disclose prior statements of any witnesses defendant 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 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.

Sincerely,

/s/ April H. Ayers-Perez

April H. Ayers-Perez

Assistant United States Attorney