

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CRIMINAL NO. 1:21-cr-00078-EGS</b>
<b>v.</b>	:	
	:	
<b>JOHN EARLE SULLIVAN</b>	:	
	:	
<b>Defendant.</b>	:	

**NOTICE OF DISCOVERY**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby informs the Court and defense that the attached discovery letter of July 14, 2021, was provided to defense counsel in this matter.

Respectfully submitted,

CHANNING D. PHILLIPS  
Acting United States Attorney



By: \_\_\_\_\_  
 Candice C. Wong  
 Assistant United States Attorney  
 D.C. Bar No. 990903  
 555 4th Street, N.W., Room 4816  
 Washington, D.C. 20530  
 202-252-7849  
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U.S. Department of Justice

Channing D. Phillips  
Acting United States Attorney

*District of Columbia*

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

July 14, 2021

Via Email

Steven Kiersh  
Counsel for John Earle Sullivan  
5335 Wisconsin Avenue, N.W., Suite 440  
Washington, D.C. 20015  
skiersh@aol.com

Re: *United States v. John Earle Sullivan*  
Case No. 1:21-cr-00078-EGS

Dear Counsel:

The enclosed letter memorializes the provision of the following additional discovery in this case, via filesharing, on July 14, 2021:

1. Excerpts of Metropolitan Police Department body worn camera footage from Upper House Door exit (24 videos)
2. Open-source videos of shooting (6 files):
  - a. ITV video
  - b. 2 videos of shooting
  - c. CSPAN video excerpt from <https://www.c-span.org/video/?507745-1/protesters-breach-us-capitol-security>
  - d. Rumble Nemos News video
  - e. Unblocked video excerpt from Youtube link <https://www.youtube.com/watch?v=CSF5FHIGlbg>
3. MARKED SENSITIVE: Videos obtained from other Capitol investigations (15 files):
  - a. D-2 – 3 photographs, 1 video
  - b. D-3 – 3 videos
  - c. D-4 – 1 video
  - d. D-5 – 1 video
  - e. D-6 – 1 video
  - f. D-7 – 1 video

- g. D-8 – 1 video
  - h. W-4 – 2 videos
  - i. W-5 – 1 video
4. MARKED SENSITIVE: Officer interview transcripts (2 files)

The discovery is unencrypted. 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.

This material is being provided pursuant to the Protective Order issued in this case. Please adhere to sensitivity markings.

I will forward additional discovery as it becomes available. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Candice", with a horizontal line underneath it.

Candice C. Wong  
Assistant United States Attorney  
202-252-7849  
Candice.wong@usdoj.gov