

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA	:	No.: 21-CR-85-CRC-1
	:	
v.	:	
	:	
JOHN STRAND,	:	
	:	
Defendant.	:	
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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 14, 2021 discovery letter in this case, in reference to discovery produced in April 2021 and July 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
for the District of Columbia
Telephone No . (956) 754-0946
April.Perez@usdoj.gov

CERTIFICATE OF SERVICE

On this 14th 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 14, 2021

Stephen F. Brennwald
BRENNWALD & ROBERTSON, LLP
922 Pennsylvania Avenue, S.E.
Washington, DC 20003
via email: sbrennwald@bcrllawfirm.com

Re: *United States v. John Strand*
Case No. 1:21-cr-00085-CRC-1

Dear Mr. Brennwald:

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. 136303664726, contained within a folder entitled Strand Discovery 21CR85. Preliminary discovery was originally uploaded to USAfx in this case on April 21, 2021. Preliminary discovery was supplemented on July 14, 2021.

The following documents have been shared via USAfx on April 21, 2021:

Serial No.	Document/Video/Photo
1	Case Opening Communication
2	EC (FD-1057) Affidavits, Complaints, and Arrest Warrants
2	Signed-Strand_Gold Unredacted Criminal Complaint
2	Signed-Strand_Gold Redacted Criminal Complaint
2	Signed-Strand_Gold Affidavit Unredacted
2	Signed-Strand_Gold Proposed Sealing Order
2	Signed-Strand Arrest Warrant
2	Signed-Gold Arrest Warrant
3	FD-302 Intake Report
4	External Import Report

5	EC (FD-1057) TTK Review
6	Intake Form – [Redacted]
7	Twitter Screenshot
7	External Email – MPD Tip
7	Photograph
8	Twitter Screenshots of John Strand
8	Photograph
8	External Email – MPD Tip
9	External Email – MPD Tip
12	External Email – MPD Tip
13	Twitter Photos and Screenshots
13	Photograph
13	Screenshot 1
13	Photograph
13	Screenshot 3
13	Screenshot 6
13	Photograph
13	Screenshot 7
13	Screenshot 8
13	Screenshot 9
13	Photograph
13	Twitter 2
13	Twitter 1
13	Photograph
13	Screenshot 4
13	Screenshot 2
13	Screenshot 5
13	Twitter Video 2 (00:56)
13	Twitter Video (00:38)
13	CNN Video (00:54)
13	Strand Twitter Photo
14	Records Check for John Strand
14	John H Strands Records
15	Getty Images Video of John Strand and Simone Gold
15	Video (01:30)
16	Interview of [Redacted]
16	Interview Notes
17	WaPo Article
17	Gold WaPo Article Photo 2
17	Gold WaPo Article Photo
17	Simone Gold WaPo Article
18	Interview of [Redacted]
18	[Redacted] Interview Notes

19	FD-302 Capitol Police Video Received
19	John Strand and Simone Gold Video
21	FD-302 Preservation Requests
22	[Redacted]
22	External Email Re: Tip
23	EC (FD-1057) Search Warrants for Strand, Gold
23	21-mj-00270 Application for Warrant
23	21-mj-00270 Order Sealing Documents
23	21-mj-00270 Warrant Individual – Gold
23	21-mj-00270 Ex Parte Application Sealing
23	21-mj-00275 Warrant Individual – Strand
23	21-mj-00275 Order Sealing Documents
23	21-mj-00275 Application for Warrant
23	21-mj-00275 Ex Parte Application Sealing
23	21-mj-00266 Application for Warrant
23	21-mj-00266 Warrant – CAR
23	21-mj-00266 Ex Parte Application Sealing
23	21-mj-00266 Order Sealing Documents
23	Order Sealing Documents Residence
23	Warrant Residence
23	Ex Parte App Sealing Documents Residence
23	Application for Warrant Residence
24	Search of Residence Evidence Log
25	Execution of Search Warrants for Strand and Gold
25	Administrative Worksheet
25	Photo Logs
25	Room Letters
25	Inventory
25	Sketch
25	Log
25	Sign In Log
25	Signed Search Warrants
25	Search Documentation
26	FD-302 California Records Check for Simone Gold and John Strand
26	Strand CII
26	Strand DL Photo
26	Strand Vehicles Registered
26	Strand Wants and Warrants
26	Strand NCIC
26	Strand DMV
26	Strand Firearms
26	Strand CCHRS
27	Interview of [Redacted]

31	Interview of [Redacted]
39	FD-302 Arrest and Initial Appearance for John Strand
39	Executed Warrant Strand
39	Executed Warrant Gold
39	Executed Arrest Warrants (Gold and Strand)
52	FD-302 Attempted Interview of John Strand
55	FD-302 Capture of Twitter Video from [Redacted]
55	Twitter Video (00:28)
57	Indictment of John Herbert Strand and Simone Melissa Gold
57	John Strand and Simone Gold Filed Indictment
58	Indictment
58	Strand Indictment
59	Interviews of USCP Officers [Redacted] and [Redacted]
59	Screenshot of Couple
60	FD-302 Imaging of Flash Media/Thumb Drive
61	STXU Case Request for Assistance
61	Warrant-Residence
67	Criminal History and Outstanding Warrants
75	EC (FD-1057) Propublica Parler Video
75	Video (00:49)
75	Propublica Screenshot – Gold and Strand
76	Comparison of [Redacted] and [Redacted]
76	BOLO Photo #21
78	EC (FD-1057) Arrest Warrant Obtained – Strand & Gold
78	Signed-Strand & Gold (unredacted) Criminal Complaint
78	Signed-Strand & Gold Proposed Sealing Order
78	Signed-Strand & Gold Affidavit (unredacted)
78	Signed-Strand Arrest Warrant
78	Signed-Gold Arrest Warrant
78	Signed-Strand & Gold Affidavit (redacted)
78	Signed-Strand & Gold (redacted) Criminal Complaint
84	FD-302 Interview of USCP Special Agent [Redacted]
84	Photograph
85	FD-302 Interview of USCP Agent [Redacted]
86	FD-302 Interview of USCO Agent [Redacted]
96	EC (FD-1057) Geofencing Results for [Redacted]
97	Interview of [Redacted]
97	Strand Capitol Photo
100	Anonymous Tip
100	External Email – MPD Tip
103	Full Coverage of Lead 10850
1 FISUR	(FD-1054) Surveillance Request of John Strand and Simone Gold
2 FISUR	Physical Surveillance Log

2 FISUR	Simone Gold Photograph
2 FISUR	John Strand Photograph
3 FISUR	01/17/2021 Physical Surveillance of John Strand
3 FISUR	Photograph Strand
1 INTELPRODS	Subfile Opening Document
2 INTELPRODS	Strand Baseball Card

The following documents have been shared via USAfx on July 14, 2021:

Serial No.	Capitol CCTV Footage (HIGHLY SENSITIVE)
110	Capitol CCTV Video (22:00)(HIGHLY SENSITIVE)
110	Capitol CCTV Video (22:00)(HIGHLY SENSITIVE)
110	Capitol CCTV Video (11:00)(HIGHLY SENSITIVE)
110	Capitol CCTV Video (06:00)(HIGHLY SENSITIVE)
110	Capitol CCTV Video (08:00)(HIGHLY SENSITIVE)
110	Capitol CCTV Video (08:00)(HIGHLY SENSITIVE)
110	Capitol CCTV Video (05:00)(HIGHLY SENSITIVE)
110	Capitol CCTV Video (04:00)(HIGHLY SENSITIVE)
110	Capitol CCTV Video (05:00)(HIGHLY SENSITIVE)
110	Capitol CCTV Video (16:00)(HIGHLY SENSITIVE)
110	Capitol CCTV Video (13:00)(HIGHLY SENSITIVE)
110	Capitol CCTV Video (13:00)(HIGHLY SENSITIVE)

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