

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Case No.: 21-cr-474-BAH
	:	
v.	:	
	:	
KRISTI MUNN, <i>et al.</i> ,	:	
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 August 11, 2021 and August 23, 2021 discovery letters, memorializing discovery sent on August 11 and August 19, 2021, which is served as an attachment via ECF on counsel for Defendants.

Respectfully submitted,

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

By: *s/ Monica A. Stump*
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PA Bar No. 90168
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Monica.stump@usdoj.gov

s/ Jennifer M. Rozzoni
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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*

August 11, 2021

VIA EMAIL

Richard Stern, Esq. – rssjrg@erols.com
H. Heather Shaner, Esq. – hhsesq@aol.com
Michelle M. Peterson, Esq. – shelli.peterson@fd.org
John L. Machado, Esq. – johnlmachado@gmail.com
John P. Calhoun, Esq. – john_calhoun@fd.org

Re: *United States v. Kristi Munn, et al.*
Case No. 21-cr-474-BAH

Dear Counsel:

This is to memorialize the following preliminary discovery sent you via email **on August 11, 2021** via USAfx which contained the following files as set forth in Attachment A to this correspondence.

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.

The discovery is unencrypted. Please contact us 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 subject to the terms of the Protective Order issued in this case.

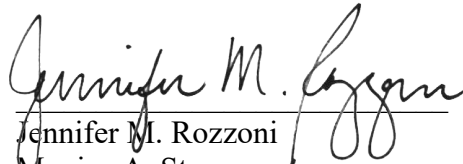
We recognize the government's discovery obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), its progeny, and Rule 16. I will provide timely disclosure if any such material comes to light. Consistent with *Giglio*, *Ruiz*, and 18 U.S.C. § 3500, I will provide information about government witnesses prior to trial and in compliance with the court's trial management order.

We 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. We also request that defendant(s) disclose prior statements of any witnesses defendant(s) 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). We 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, We request that defendants provide the government with the appropriate written notice if defendants 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.

We will forward additional discovery in the coming weeks. If you have any questions, please feel free to contact us.

Sincerely,



Jennifer M. Rozzoni

Monica A. Stump

Assistant United States Attorneys

Enclosure(s)

Attachment A

Timeline Videos – HIGHLY SENSITIVE folder

20210106-FELONYRIOTING-CAPITAL_BUILDING.mp4_clip_1633_1656.mp4
Crypt East - 2021-01-06_19h20min01s.mp4_clip_588_639.mp4
Crypt Lobby East - 2021-01-06_19h19min01s.mp4_clip_690_738.mp4
Crypt Lobby East - 2021-01-06_19h31min20s.mp4_clip_0_309.mp4
Memorial Door - 2021-01-06_19h31min24s.mp4_clip_865_910.mp4
SenateWingDoornearS139_2021-01-06_14h20min18s087ms.mp4_clip_294_326.mp4
SenateWingDoornearS139_2021-01-06_15h13min58s920ms.mp4_clip_155_211.mp4

USCP Surveillance Footage – HIGHLY SENSITIVE folder

East Rotunda Door Interior folder

East Rotunda Door Interior - 2021-01-06_19h53min48s.mp4
East Rotunda Door Interior - 2021-01-06_20h29min36s.mp4
East Rotunda Door Interior-2021-01-06_14h15min00s000ms.mp4
East Rotunda Door Interior-2021-01-06_14h43min05s000ms.mp4
East Rotunda Door Interior-2021-01-06_15h00min00s000ms.mp4
East Rotunda Door Interior-2021-01-06_15h28min00s000ms.asf

Rotunda Door Interior folder

Rotunda Door Interior-2021-01-06_14h15min00s000ms.asf
Rotunda Door Interior-2021-01-06_14h43min05s000ms.mp4

Rotunda Lobby East folder

Rotunda Lobby East Stairs-2021-01-06_14h36min50s000ms.asf
Rotunda Lobby East Stairs-2021-01-06_14h38min53s000ms.asf
Rotunda Lobby East Stairs-2021-01-06_14h46min39s000ms.mp4
Rotunda Lobby East Stairs-2021-01-06_14h46min59s000ms.mp4
Rotunda Lobby East Stairs-2021-01-06_15h01min12s000ms.mp4
Rotunda Lobby East Stairs-2021-01-06_15h02min00s000ms.asf

Rotunda North folder

Rotunda North-2021-01-06_15h01min59s000ms.mp4
Rotunda North-2021-01-06_14h58min03s000ms.asf
Rotunda North-2021-01-06_14h28min45s000ms.asf
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RotundaNorth_2021-01-06_14h50min24s710ms.mp4
RotundaNorth_2021-01-06_15h02min09s900ms.mp4
RotundaNorth_2021-01-06_15h11min53s727ms (h.s.).mp4

Rotunda South folder

Rotunda South - 2021-01-06_14h34min32s.mp4
Rotunda South - 2021-01-06_15h01m56s-15h07m00s.mp4
Rotunda South - 2021-01-06_19h52min26s (1).mp4
Rotunda South - 2021-01-06_20h01min22s (h.s.).mp4
Rotunda South - 2021-01-06_20h10min20s (h.s.).mp4
Rotunda South - 2021-01-06_20h19min16s (h.s.).mp4
Rotunda South-2021-01-06_14h26min19s000ms.mp4
Rotunda South-2021-01-06_14h32min34s000ms.asf
Rotunda South-2021-01-06_14h33min45s000ms.asf
Rotunda South-2021-01-06_14h42min34s000ms.asf
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Rotunda South-2021-01-06_14h58min03s000ms.asf
Rotunda South-2021-01-06_15h15min00s000ms.asf

Memorial_Door_-_2021-01-06_19h31min24s_1 HIGHLY SENSITIVE.mp4

Interview_of_Dawn_Munn.pdf
Interview_of_Kayli_Munn.pdf
Interview_of_Thomas_Munn.pdf



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*

August 23, 2021

VIA EMAIL

Michelle M. Peterson
Office of the Federal Public Defender for the District of Columbia

John Phillip Calhoun
Office of the Federal Public Defender for Western District of Texas

H. Heather Shaner
Law Office of H. Heather Shaner

Richard Steven Stern
Law Office of Richard S. Stern

John L. Machado
Law Office of John Machado

Re: *United States v. Munn, et al.*,
Case No. 21-cr-474-BAH
Letter No. 2

Dear Counsel:

This is to memorialize the following discovery sent you on **August 19, 2021**, via USAFX which contained the following materials:

Reports of surveillance conducted on March 1, 2021, March 12, 2021, March 26, 2021, July 6, 2021, July 7, 2021, July 11, 2021, and July 12, 2021, and notes
Requests for and Records from AT&T, and Verizon, Snap Inc.
Opening investigation reports for Kristi, Dawn, and Thomas Munn
Eight Screenshots of Munn family members inside the Capitol from D.Live
Public records, such as wage, driver's license, and residential records, and criminal history records for Kristi, Dawn and Thomas Munn

Reports of image searches for Dawn and Thomas Munn
Munn Family identification report and three photographs
Parler search results for the Munn family
Reports of video review and identification of the Munns, including on CCTV, publicly available videos and social media
Report discussing Munn family travel to Washington, DC, including Facebook 10 posts and photographs
Arrest Report of Thomas, Dawn, and Kayli Munn
Interview reports for Kristi, Dawn and Thomas Munn and notes
Audio of Thomas Munn's interview and Miranda form
Six Facebook search warrants and notice of returns
Snap Chat search warrant and notice of return
Interview of tipsters
Three reports of information from N. Jones and photographs
Arrest warrants and returns for Kristi, Thomas, Kayli, Josh, and Dawn Munn
AT&T Search warrant and return
Reports of search and evidence seized from Jackson Street, including photograph log, sketch, notice of photographs, and evidence log
Report on utilities checks
Subfile opening report
Search warrant for Avalon Street and Evidence seized

The file names for each document provided are outlined in Attachment A to this correspondence.

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

Sincerely,

/s/ Monica A. Stump

Monica A. Stump
Assistant United States Attorney

/s/ Jennifer Rozzoni
Assistant United States Attorney

Enclosure(s)

ATTACHMENT A

Dawn Munn -- 3385911

Serial 0000001.pdf
Serial 0000001_1A0000002_0000001.jpg
Serial 0000001_1A0000002_0000002.jpg
Serial 0000001_1A0000002_0000003.jpg
Serial 0000001_1A0000002_0000004.jpg
Serial 0000001_1A0000002_0000005.jpg
Serial 0000001_1A0000002_0000006.jpg
Serial 0000001_1A0000002_0000007.jpg
Serial 0000001_1A0000002_0000008.jpg
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Serial 0000003.pdf
Serial 0000003_1A0000004_0000001 SENSITIVE.pdf
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Serial 0000010.pdf
Serial 0000019.pdf

Kristi Munn -- 3384888

Serial 0000001.pdf
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Thomas Munn -- 3385905

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