UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	**Criminal No. 21-CR-68 (TNM)**
	:	
v.	:	
	:	
JENNY CUDD and	:	
ELIEL ROSA,	:	
Defendants.	:	
	:	

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 April 26, 2021 discovery letter in this case, which was served as an attachment via ECF on counsel for the Defendants.

Respectfully submitted,

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

By: /s/
Amanda Fretto
Assistant United States Attorney
D.C. Bar No. 1018284
555 Fourth Street, N.W., Room 3126
Washington, DC 20530
Amanda.Fretto@usdoj.gov
(202) 252-7268

CERTIFICATE OF SERVICE

On this 26th day of April, 2021, a copy of the foregoing was served on counsel of record for the defendants via the Court's Electronic Filing System.

/s/
Amanda Fretto
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

April 26, 2021

VIA ELECTRONIC MAIL

Shelli Peterson, Esq.
Assistant Federal Public Defender
625 Indiana Avenue, Suite 550
Washington D.C. 20004
Shelli_peterson@fd.org

Marina Medvin, Esq.
Medvin Law PLC
916 Prince Street
Alexandria, VA 22314
marina@medvinlaw.com

Re: *United States v. Jenny Cudd and Eliel Rosa*
Case No. 21-cr-68
Discovery Production No. 2

Dear Counsel:

In response to your request for discovery, and in the hopes of exploring a possible resolution of this matter in the future, we write to memorialize the preliminary discovery that we provided.

The following materials were provided via USAfx on March 11, 2021:

- From the USAfx folder labeled "Cudd-Rosa Discovery Production 1" in subfolder labeled "Search Warrant for Cudd Cell Phone": a search warrant and affidavit for the Apple iPhone and Samsung Cell Phone (25 pages).

The following materials were provided via USAfx on April 22, 2021, in the folder labeled "Cudd-Rosa Discovery Production 2":

- From the USAfx folder labeled, "Search Warrant Affidavits":
  - Search warrant and affidavit for the residence of Jenny Cudd (18 pages);
  - Search warrant and affidavit for the vehicle registered to Jenny Cudd (16 pages);
  - Search warrant and affidavit for the Apple iPhone and Samsung Cell Phone (25 pages);
  - Search warrant and affidavit for the Facebook accounts of Jenny Cudd and Eliel Rosa (30 pages).

- From the USAfx folder labeled, "Arrest Warrant Documents":
  - Executed Arrest Warrants for Cudd and Rosa (2 pages);
  - Signed Complaint for Cudd and Rosa (1 page);
  - Signed Complaint Redacted for Cudd and Rosa (1 page);
  - Statement of Facts for Cudd and Rosa (5 pages).

- By email and from the USAfx folder labeled, "Viewing Letter for US Capitol and Maps":
  - April 22, 2021 correspondence inviting counsel to attend a tour of the Capitol (2 pages);
  - US Capitol – First Floor Plan (1 gif);
  - US Capitol – Second Floor Plan (1 gif);
  - US Capitol – Third Floor Plan (1 gif).

We received a notification that counsel has already downloaded some of the materials for this case from USAfx. To the extent you have not already done so, please download all of these files as soon as possible from USAfx, as it is not a storage medium; rather, it is a file transfer method. The folder and its contents will expire within 60 days. Please advise me immediately if you have difficulty downloading the discovery folder. This early discovery is not a complete production, but rather preliminary discovery.

We anticipate producing more fulsome discovery. We have compiled a set of additional materials for you, which are being processed and bates stamped. We will disclose those materials as soon as processing is complete, subject to the previously entered Protective Order. 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.

If you have any questions, please feel free to contact me.

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY
For the District of Columbia

By: /s/

AMANDA FRETTO
D.C. Bar No. 1018284
Assistant United States Attorney
555 4th Street, N.W.
Washington, D.C. 20530
(202) 252-7268
Amanda.Fretto@usdoj.gov