

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

ARTHUR JACKMAN,

Defendant.

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Case No: 21-CR-378 (TJK)

**NOTICE OF FILING OF DISCOVERY CORRESPONDENCE**

The United States of America, by and through the United States Attorney for the District of Columbia, hereby files its August 3, 2021 discovery letter, memorializing discovery sent on that same day, which is served as an attachment via ECF on counsel for Defendant.

Respectfully submitted,

CHANNING D. PHILLIPS  
ACTING UNITED STATES ATTORNEY

By:     /s/ Nadia E. Moore    

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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*

August 3, 2021

Eugene Ohm  
Federal Public Defender for the District of Columbia  
625 Indiana Ave. NW  
Washington D.C. 20004  
Email: Eugene\_Ohm@fd.org

Re: *United States v. Arthur Jackman*  
Case No. 21-CR-378 (TJK)

Dear Mr. Ohm:

We are writing to provide you with preliminary discovery in this case through USAFx. This material is subject to the terms of the Protective Order issued in this case. The discovery is unencrypted. Please contact me if you have any issues accessing the information. ***All files uploaded to USAFx will automatically be deleted after 60 days per the automatic retention policy in place. Please download the files before then.***

Note that all these files and their related physical attachments are currently being formally processed for discovery by the discovery team assigned to the Capitol Riots cases. As such, the same files will be re-produced with bates-stamps at a later date. Nevertheless, we wanted to provide you what we can now as we wait for this processing to be finalized.

The transcript of the May 26, 2021 grand jury transcript as well as the following materials are designated as SENSITIVE under the protective order in this case:

0176-TP-3379197\_0000011\_Redacted.pdf  
0176-TP-3379197\_0000011\_1A0000003\_0000001\_Redacted.pdf  
0176-TP-3379197\_0000011\_1A0000003\_0000002\_Redacted.pdf  
0176-TP-3379197\_0000044.pdf  
0176-TP-3379197\_0000044\_1A0000012\_0000001\_PHYSICAL.pdf  
0176-TP-3379197\_0000044\_1A0000013\_0000001.docx

The United States Capitol Police surveillance video as well as the following materials are designated as HIGHLY SENSITIVE under the protective order in this case:

0176-TP-3379197\_0000027.pdf

0176-TP-3379197\_0000027\_1A0000017\_0000001.pdf

0176-TP-3379197\_0000027\_1A0000017\_0000002.pdf

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

Sincerely,

Nadia Moore  
William Dreher  
Christopher Veatch  
Assistant United States Attorneys

Enclosure(s)

**Exhibit A:**

0176-TP-3379197\_0000011\_Redacted.pdf  
 0176-TP-3379197\_0000011\_1A0000003\_0000001\_Redacted.pdf  
 0176-TP-3379197\_0000011\_1A0000003\_0000002\_Redacted.pdf  
 0176-TP-3379197\_0000027.pdf  
 0176-TP-3379197\_0000027\_1A0000017\_0000001.pdf  
 0176-TP-3379197\_0000027\_1A0000017\_0000002.pdf  
 0176-TP-3379197\_0000040.pdf  
 0176-TP-3379197\_0000040\_1A0000027\_0000001\_PHYSICAL.pdf  
 0176-TP-3379197\_0000044.pdf  
 0176-TP-3379197\_0000044\_1A0000012\_0000001\_PHYSICAL.pdf  
 0176-TP-3379197\_0000044\_1A0000013\_0000001.docx  
 May 26, 2021 Grand Jury exhibits 1 – 19  
 Transcript of May 26, 2021 grand jury transcript  
 25 body worn camera files  
 One additional USCP video

**Capitol Video Production Index**  
 (as of August 3, 2021)

<b>Title</b>	<b>Bates</b>	<b>Description</b>
ABQ Raw 31 Minute youtube.com watch v=YONAuAesjAY	CAPVID 00001	31:00 video showing scenes outside Capitol grounds, breach of First Street barricades, stairs near inauguration stage
ABQ Raw 9 minute youtube.com watch v=oYxKioXhve0	CAPVID_00002 21CR175_00001498	9:52 video showing breach of First Street barricades, breach of west plaza
ABQ Raw Anatomy of a Riot youtube.com	CAPVID_00003 21CR175_00001499	30:41 video showing scenes outside the Capitol grounds, breach of the First Street gate, breach of the west plaza, violence on the west plaza and the lower west terrace.
ABQ Raw People Storm the Capitol youtube.com	CAPVID_00004	18:24 video showing breach of the First Street barricades, breach of the west plaza, and violence on west plaza and lower west terrace
Banned-Video What REALLY Happen at the Capitol	CAPVID_00005	1:28:30 video showing scenes from the west plaza and lower west terrace
BG on the Ground - Trump Supporters Storm US Capitol in DC youtube.com	CAPVID_00006	1:35 video from upper west terrace, showing Dominic Pezzola breaking Capitol window with a riot shield

<b>Title</b>	<b>Bates</b>	<b>Description</b>
Block Video	CAPVID_00007 21CR175_00001497	1:40:41 video showing Proud Boy march
BREAKING_ Trump Supporters Breach Barriers and Storm Capitol	CAPVID 00008	1:25:40 video showing breach of First Street gate, breach of west plaza, violence on west plaza
Capitolhunters walking outside capitol twitter.com	CAPVID 00009	:10 video from the Capitol grounds, including Arthur Jackman
Channel 4 News Proud boys leader will continue to happen youtube	CAPVID 00010	10:10 video that aired on the BBC after the events of January 6. Features an interview with Tarrío.
ElijahSchaffer Twitter assault on the barricades	CAPVID 00011	1:41 video showing breach of the First Street barricades
Hunting Insurrectionists Columbus Door Parler Videos youtube.com	CAPVID 00012	19:53 video that shows scenes on the east side of the Capitol, including the breach of the Columbus doors
Hunting Insurrectionists East Columbus Doors 1345 - 1645 youtube.com	CAPVID 00013	2:59:59 video that shows scenes from the east side of the Capitol from multiple angles, including the breach of the Columbus doors. Includes footage from inside the Capitol as well.
Hunting Insurrectionists Joe Biggs Timeline youtube.com	CAPVID 00014	12:09 video showing portions of the Proud Boys march from Washington Monument to the Capitol, the breach of the First Street barricades, the upper west terrace, and the Columbus doors
Hunting Insurrectionists youtube	CAPVID 00015	13:44 video showing Proud Boys near the food trucks, the breach of the First Street Barricades, multiple angles of the breach of the west plaza, video from the west plaza, and from the east side of the Capitol, including the breach of the Columbus doors
Hunting Insurrectionists Terrorist breach the West Barricades youtube.com	CAPVID_00016	24:43 video that shows multiple angles of the breach of the First Street barricades, the breach of the barricades outside the west plaza, and rioting on the west plaza
Hunting Insurrectionists Terrorist break into Capitol multiple angles youtube.com	CAPVID 00017	5:12 video featuring multiple videos showing the breach of the Capitol building on the west side and rioters' confrontation with Officer Eugene Goodman

<b>Title</b>	<b>Bates</b>	<b>Description</b>
Insurgence full video seige on Capitol youtube.com	CAPVID 00018	1:26:25 video, featuring footage from outside the Capitol grounds, the west plaza, the stairs under the Inauguration stage, the upper west terrace, and inside the Capitol
Miami Proudboy - MoSD brief youtube.mp4	CAPVID 00019	1:38:03 video from December 30, 2020, featuring Enrique Tarrío, Joe Biggs, Zach Rehl, and others describe the Ministry of Self Defense
Nabert Biggs timeline twitter	CAPVID 00020	2:18 video from the west plaza with defendant Biggs circled in multiple shots.
Nabert BulgePB twitter.com	CAPVID 00021	1:00 video from outside on the Capitol grounds
Nigrotime Capitol Riots Raw Footage youtube.com	CAPVID 00022	42:56 video showing areas outside the Capitol grounds, the lower west plaza, the stairs under and around the inauguration stage, the east side of the Capitol, and inside the building
Nigrotime The US Capitol Breach as it happened youtube.com	CAPVID 00023	7:17 video showing scenes from the east side of the Capitol, including breach of the Columbus doors and inside the Capitol
Nine_niall Twitter subjects entering.mp4	CAPVID 00024	:33 video from the upper west terrace
Propublica Parler 1253 Near Capitol - Breaching Fence	CAPVID 00025	:29 video showing breach of fencing on First Street
Propublica Parler 1357 Near Capitol Barricades Being Removed	CAPVID 00026	2:20 video showing barricades breached on east side of Capitol
Propublica Parler 1406 Near Capitol Pushing Past Police Line	CAPVID 00027	:30 video from east side of Capitol
Propublica Parler 1411 Near Capitol Pushing up Scaffolding	CAPVID 00028	1:03 video from scaffolding under Inauguration stage
Propublica Parler 1412 Near Capitol Reaching Walls and Banging on Windows	CAPVID 00029	:29 video from upper west terrace
Propublica Parler 1413 Near Capitol - Radio	CAPVID 00030	1:54 video form west plaza

<b>Title</b>	<b>Bates</b>	<b>Description</b>
Propublica Parler 1413 Near Capitol - Windows	CAPVID 00031	:15 video showing breaking of Capitol window with riot shield
Propublica Parler 1414 Inside the Capitol	CAPVID 00032	:35 video showing rioters entering Capitol, including Biggs
Propublica Parler 1415 Inside the Capitol	CAPVID 00033	1:48 video showing rioters entering Capitol, including Biggs
Propublica Parler 1501 inside the Capitol	CAPVID 00034	:05 video from inside the Rotunda
Propublica Parler 1512 Inside the Capitol	CAPVID 00035	:50 video from inside the Capitol
realJamesKlug Twitter Klein brothers breach door	CAPVID 00036	1:00 video showing breach of Capitol door
realJamesKlug Twitter Klein brothers breach door part 2	CAPVID 00037	:38 video showing attempted breach of Capitol door
RFIRN Eastside Capitol Building youtube.com.	CAPVID 00038	1:07:59 video showing scenes from the east side of the Capitol, including breach of the Columbus doors
SRM Pro Trump Protestors Beat Police Officer youtube.com	CAPVID 00039	2:31 video including senes from the lower west terrace and tunnel entrance to the crypt.
SRM Scenes of Chaos outside US Capitol youtube.com	CAPVID 00040	29:22 video including scenes from the lower west terrace and tunnel entrance to the crypt.
The Sun Live Stream youtube.com.mp4	CAPVID 00041	1:59:24 video showing the east side of the Capitol, including Proud Boys march
washingtondc theellipse live irl LIVE in DC where Trump has called in the PATRIOTS	CAPVID_00042 21CR175_00001496	3:30:00 video showing scenes outside Capitol grounds, Proud Boys near the food trucks,
Video showing breach and Pezzola shield carry	CAPVID_00043 21CR175_00001495	1:21:17 video showing breach of First Street gate and entry onto Capitol grounds; Donohoe, Pezzola, and Greene at 33:19
IMG_9475.MOV	CAPVID 00044	0:01 video (Biggs Google Return)
IMG_9476.MOV	CAPVID 00045	0:56 video depicting pedestrian walkway (Biggs Google Return)
IMG_9477.MOV	CAPVID 00046	0:42 video depicting west plaza (Biggs Google Return)
IMG_9481.MOV	CAPVID 00047	0:18 video depicting west plaza (Biggs Google Return)

<b>Title</b>	<b>Bates</b>	<b>Description</b>
IMG_9483.MOV	CAPVID_00048	0:21 video depicting west plaza (Biggs Google Return)
IMG_9492.MOV	CAPVID_00049	0:42 video depicting west plaza (Biggs Google Return)
IMG_9495.MOV	CAPVID_00050	0:08 video depicting west plaza (Biggs Google Return)
IMG_9496.MOV	CAPVID_00051	0:58 video depicting west plaza (Biggs Google Return)
IMG_9508.MOV	CAPVID_00052	0:15 video depicting west side of Capitol lawn; Biggs selfie (Biggs Google Return)
IMG_9531.MOV	CAPVID_00053	0:09 video depicting east plaza (Biggs Google Return)
IMG_9573.MOV	CAPVID_00054	0:19 video depicting television coverage of vote count (Biggs Google Return)
4104714703243710000.mp4	CAPVID_00055	0:13 video depicting protestors entering grounds (Biggs Google Return)
camvideo_5702bda6.mp4	CAPVID_00056	0:06 video Biggs selfie at Washington Monument (Biggs Google Return)
IMG_1538	CAPVID_00057	:21 video showing banner on ground near Washington Monument
IMG_1539	CAPVID_00058	1:10 video showing crowd near Washington Monument
IMG_1540	CAPVID_00059	1:52 video showing crowd near Washington Monument and National Museum of African American History and Culture
IMG_1542	CAPVID_00060	:30 video showing members of the Oath Keepers
IMG_1543	CAPVID_00061	:20 video showing members of the Oath Keepers
IMG_1544	CAPVID_00062	:26 video showing member of the Proud Boys and others near the intersection of 2nd St and Constitution Ave NW
IMG_1545	CAPVID_00063	:18 video showing members of the Proud Boys and others marching near the intersection of Constitution and First Street NW
IMG_1546	CAPVID_00064	:05 video of Proud Boys and others marching near the Peace Monument
IMG_1547	CAPVID_00065	:38 video of Proud Boys and others congregating near the Peace Monument



<b>Title</b>	<b>Bates</b>	<b>Description</b>
IMG_1548	CAPVID_00066	:12 video of crowd gathered near the Peace Monument
IMG_1549	CAPVID_00067	9:26 video of crowd advancing from Peace Monument to barriers, overwhelming police and toppling barriers, advancing up pedestrian walkway to Capitol, and filling west plaza
IMG_1550	CAPVID_00068	:06 selfie video on the west plaza
IMG_1551	CAPVID_00069	2:07 video on the west plaza
IMG_1552	CAPVID_00070	:26 video on the west plaza
IMG_1553	CAPVID_00071	:22 video on the west plaza
IMG_1554	CAPVID_00072	:05 video on the west plaza
IMG_1555	CAPVID_00073	:25 video on west plaza
IMG_1556	CAPVID_00074	:10 video on west plaza
IMG_1557	CAPVID_00075	:27 video on west plaza
IMG_1558	CAPVID_00076	:23 video on west plaza
IMG_1559	CAPVID_00077	:26 video on west plaza
IMG_1560	CAPVID_00078	:05 video on west plaza
IMG_1561	CAPVID_00079	4:45 video on west plaza
IMG_1562	CAPVID_00080	7:52 video on west plaza
IMG_1563	CAPVID_00081	1:30 video on west plaza
IMG_1564	CAPVID_00082	1:34 video on west plaza
IMG_1566	CAPVID_00083	3:43 video on west plaza
IMG_1568	CAPVID_00084	1:05 video on west plaza
IMG_1569	CAPVID_00085	:23 video on west plaza
IMG_1570	CAPVID_00086	:10 video on west plaza
IMG_1572	CAPVID_00087	1:37 video on west plaza
IMG:1573	CAPVID_00088	:08 video on west plaza
IMG_1575	CAPVID_00089	4:14 video on west plaza and stairs under Inauguration stage
IMG_1576	CAPVID_00090	1:32 video from west plaza and stairs under Inauguration stage
IMG_1577	CAPVID_00091	2:07 video from upper west terrace
IMG:1578	CAPVID_00092	2:13 video from upper west terrace and inside Capitol
IMG_1580	CAPVID_00093	5:23 video from inside Capitol in hallway with Officer Eugene Goodman and others

<b>Title</b>	<b>Bates</b>	<b>Description</b>
IMG_1581	CAPVID_00094	:44 video from inside Capitol in hallway with Officer Eugene Goodman and others
IMG_1582	CAPVID_00095	:06 video from inside Capitol in hallway with Officer Eugene Goodman and others
IMG_1583	CAPVID_00096	:08 video from inside Capitol in hallway with Officer Eugene Goodman and others
IMG_1584	CAPVID_00097	:12 video from inside Capitol in hallway with Officer Eugene Goodman and others
IMG_1585	CAPVID_00098	:19 video from Capitol balcony on east side
IMG_1588	CAPVID_00099	:07 video from outside east of Capitol
IMG_1589	CAPVID_00100	:44 video from outside east of Capitol
IMG_1592	CAPVID_00101	:53 video from outside east of Capitol
IMG_1593	CAPVID_00102	:49 video from Capitol balcony on east side
IMG_1594	CAPVID_00103	:23 video from Capitol balcony on east side
IMG_1595	CAPVID_00104	:09 video from Capitol balcony on east side, facing doors
IMG_1596	CAPVID_00105	:40 video from Capitol balcony on east side
IMG_1597	CAPVID_00106	:09 video from Capitol balcony on east side, facing doors
IMG_1598	CAPVID_00107	:06 video from Capitol balcony on east side, facing doors
IMG_1599	CAPVID_00108	:15 video from Capitol balcony on east side, facing doors
IMG_1600	CAPVID_00109	:31 video from Capitol balcony on west side, facing doors
IMG_1601	CAPVID_00110	2:12 video from Capitol balcony on west side, facing doors
IMG_1602	CAPVID_00111	:23 video from inside the rotunda
IMG_1603	CAPVID_00112	2:26 video from inside the rotunda
IMG_1604	CAPVID_00113	:18 video from near the rotunda
IMG_1606	CAPVID_00114	6:48 video from in/near the rotunda
IMG_1607	CAPVID_00115	:35 video from near the rotunda
IMG_1610	CAPVID_00116	:31 video from east balcony of Capitol, facing doors

<b>Title</b>	<b>Bates</b>	<b>Description</b>
IMG_1611	CAPVID_00117	:34 video from east balcony of Capitol, facing doors
IMG_1612	CAPVID_00118	:18 video from east balcony of Capitol, panning crowd
IMG_1614	CAPVID_00119	:17 video showing broken window on Capitol
IMG_1615	CAPVID_00120	2:19 video from east east balcony of Capitol
IMG_1616	CAPVID_00121	:27 video from outside Capitol on east side
IMG_1617	CAPVID_00122	:34 video form outside Capitol on east side
IMG_1618	CAPVID_00123	:43 video from outside Capitol on east side
IMG_1619	CAPVID_00124	:26 video from outside Capitol on east side
IMG_1620	CAPVID_00125	:27 video from outside Capitol