

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

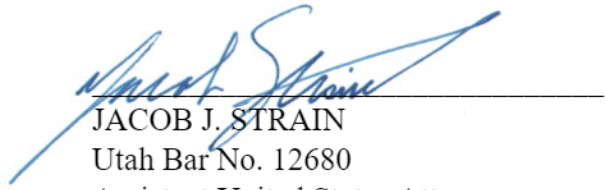
UNITED STATES OF AMERICA :  
 :  
 v. : CRIMINAL NO. 1:21-cr-00539-TSC  
 :  
 NICHOLAS J PERRETТА and :  
 MITCHELL PAUL VUKICH, :  
 :  
 Defendants. :

**NOTICE OF FILING**

The Government requests that the attached discovery letter, dated November 1, 2021, be made part of the record in the above-captioned case.

Respectfully submitted,

CHANNING D. PHILLIPS  
ACTING UNITED STATES ATTORNEY



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**U.S. Department of Justice**

**CHANNING D. PHILLIPS**  
Acting United States Attorney  
District of Utah

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

**November 1, 2021**

To:  
Carmen D. Hernandez, counsel for Nicholas Perretta  
Mark Wilson, counsel for Mitchell Vukich

**RE: U.S. v. NICHOLAS J PERRETTA and MITCHELL PAUL VUKICH (1:21-cr-00539-TSC)**

Dear Counsel,

Pursuant to our discovery obligations, we have provided the following files via USAfx on November 1, 2021. Note that many of 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, some of the same files will be re-produced with bates-stamps at a later date.

1. Library\_SMS\_Attachments\_0b\_11\_E7B328A5-1F1A-4EFA-B843-BEB2B6697EEE\_IMG\_7702.HEIC
2. Library\_SMS\_Attachments\_75\_05\_879F40A7-6013-4CC0-ACA3-958BB1CF35FE\_IMG\_7703.HEIC
3. Library\_SMS\_Attachments\_eb\_11\_E35554F4-CA0B-4C41-A62C-6EAB7E5EE10F\_IMG\_7704.HEIC
4. Library\_SMS\_Attachments\_eb\_11\_E35554F4-CA0B-4C41-A62C-6EAB7E5EE10F\_IMG\_7704.jpg
5. 1B1.iPhone.A1984EvidenceCollection\_2021-06-29\_Report\_2021-06-30\_Report\_04.pdf
6. 20210727\_142458.jpg
7. 20210727\_142719.jpg
8. 20210727\_142743.jpg
9. 20210727\_142753.jpg
10. 20210727\_142809.jpg
11. 20210727\_142832.jpg
12. 20210727\_142858.jpg

13. 20210727\_142939.jpg
14. 20210727\_142947.jpg
15. 20210727\_142955.jpg
16. 20210727\_143041.jpg
17. 20210727\_143121.jpg
18. 20210727\_143144.jpg
19. 20210727\_143155.jpg
20. 20210727\_143240.jpg
21. 20210727\_144011.jpg
22. 20210727\_144026.jpg
23. 20210727\_144040.jpg
24. 20210727\_144055.jpg
25. 20210727\_144127.jpg
26. 20210727\_144153.jpg
27. 20210727\_144250.jpg
28. 20210727\_144357.jpg
29. 20210727\_160942.jpg
30. 20210727\_160942.jpg
31. 20210727\_160949.jpg
32. 20210727\_160949.jpg
33. 20210727\_161110.mp4
34. 20210727\_161129.mp4
35. 20210727\_161207.jpg
36. 20210727\_161207.jpg
37. 20210727\_161217.mp4
38. 20210727\_161230.mp4
39. 20210727\_161318.jpg
40. 20210727\_161318.jpg
41. 20210727\_161341.mp4
42. 20210727\_161409.mp4
43. 20210727\_161422.mp4
44. 20210727\_161438.mp4
45. 20210727\_161504.jpg
46. 20210727\_161504.jpg
47. 20210727\_161704.mp4
48. 20210727\_161734.mp4
49. 302 - Re Twitter Search.pdf
50. 5005.JPG
51. 5005\_1.JPG
52. 5005\_2.JPG
53. 5005\_3.JPG
54. 5005\_4.JPG
55. 5005\_5.JPG
56. 5005\_6.JPG
57. 5005\_thumb.jpg
58. 5005\_thumb\_1.jpg

59. 5005\_thumb\_2.jpg
60. 5005\_thumb\_3.jpg
61. 5005\_thumb\_4.jpg
62. 5005\_thumb\_5.jpg
63. 5005\_thumb\_6.jpg
64. activityAnalytics.png
65. address-entry.png
66. attachment.png
67. calendar.png
68. call.png
69. car-entry.png
70. chat.png
71. data-files.png
72. Deleted1.png
73. Deleted-icon.png
74. email.png
75. email-entry.png
76. email-read.png
77. email-sent.png
78. fax-entry.png
79. Forwarded.png
80. FromArrow.png
81. general-entry.png
82. google-earth.png
83. google-maps.png
84. goto.png
85. HeaderPdf.jpg
86. home-entry.png
87. infected.png
88. Intact-icon.png
89. ipconnection.png
90. logoIcon.png
91. map-icon.png
92. mobile-entry.png
93. notes-entry.png
94. office-entry.png
95. organization.png
96. pager-entry.png
97. RE\_ Interview re January 6th Capitol Riot\_Redacted.pdf
98. Scrambled.png
99. SentWithSiri.png
100. skype.png
101. star.png
102. sub-element.png
103. Tag.png
104. thumb\_\_1(2).jpg

105. thumb\_\_1(3).jpg
106. thumb\_\_1.jpg
107. ToArrow.png
108. Unknown-icon.png
109. warning-icon.png
110. web-address-entry.png
111. work-entry.png

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.

This material is subject to the terms of the Protective Order issued in this case.

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(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). 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(s) 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.

By: /s/ Jacob J. Strain  
JACOB J. STRAIN  
Assistant United States Attorney