UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v. : Case No. 21-cr-00306

JON SCHAFFER,

:

Defendant.

AMENDED MOTION FOR AN ORDER TO DISCLOSE ITEMS PROTECTED BY FEDERAL RULE OF CRIMINAL PROCEDURE 6(e) AND SEALED MATERIALS

The United States of America respectfully moves for entry by this Court of an order permitting the disclosure in discovery of materials protected by Federal Rule of Criminal Procedure 6(e). The United States also requests permission to provide in discovery in the cases of *United States v. Stewart Rhodes*, et. al. (22-cr-00015-APM), *United States v. Donovan Crowl*, (21-cr-28-APM), and *United States v. Jonathan Walden* (unavailable) sealed materials related to the above-captioned case pursuant to the previously entered protective order that has so far been entered in 21-cr-00028 governing discovery. Finally, the United States requests that any order granting this motion be made applicable to co-defendants who may later be joined.

The United States is authorized to represent to the Court that Defendant does not oppose this motion or the entry of the attached order.

WHEREFORE, the United States respectfully requests an order authorizing the disclosure in discovery of the materials described above.

Respectfully submitted,

MATTHEW M. GRAVES UNITED STATES ATTORNEY D.C. Bar Number 481052

By:

Ahmed M. Baset
Assistant United States Attorney
IL Bar No. 630-4552
Troy A. Edwards, Jr.
Louis Manzo
Kathryn Rakoczy
Jeffrey Nestler
Assistant United States Attorneys
U.S. Attorney's Office for the District of Columbia
555 4th Street, N.W.

/s/

Washington, D.C. 20530

Alexandra Hughes
Justin Sher
Trial Attorneys
National Security Division
United States Department of Justice
950 Pennsylvania Avenue NW
Washington, D.C. 20004