

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	CRIMINAL NO. 1:21-cr-00078-EGS
v.	:	
	:	
JOHN EARLE SULLIVAN	:	
	:	
Defendant.	:	

NOTICE OF DISCOVERY

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby informs the Court and defense that the attached discovery letter of October 13, 2021, was provided to defense counsel in this matter.

Respectfully submitted,

CHANNING D. PHILLIPS
Acting United States Attorney



By: _____
 Candice C. Wong
 Assistant United States Attorney
 D.C. Bar No. 990903
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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*

October 13, 2021

Via Email

Steven Kiersh
Counsel for John Earle Sullivan
5335 Wisconsin Avenue, N.W., Suite 440
Washington, D.C. 20015
skiersh@aol.com

Re: *United States v. John Earle Sullivan*
Case No. 1:21-cr-00078-EGS

Dear Counsel:

The enclosed letter memorializes the provision of the following additional discovery in this case, via filesharing, on October 13, 2021:

1. Intuit subpoena returns (41 files)
2. YouTube search warrant and return
3. MARKED SENSITIVE: Videos obtained from other Capitol investigations (8 files):
 - a. D-9 – 1 video
 - b. D-11 – 2 videos
 - c. D-12 – 4 videos
 - d. D-13 – 1 video
4. MARKED SENSITIVE: Officer interview transcripts (2 files)
5. FBI exhibits used in February 10, 2021 officer interviews (2 files)
6. Deseret article with interview of defendant
7. Petition by defendant
8. Open-source CSPAN video excerpt from Statuary Hall

The discovery is unencrypted. 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.

This material is being provided pursuant to the Protective Order issued in this case. Please adhere to sensitivity markings.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Candice", with a horizontal line extending to the right from the end of the signature.

Candice C. Wong
Assistant United States Attorney
202-252-7849
Candice.wong@usdoj.gov