

**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 November 8, 2021, was provided to defense counsel in this matter.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney

By: 

Candice C. Wong
Assistant United States Attorney
D.C. Bar No. 990903
555 4th Street, N.W., Room 4816
Washington, D.C. 20530
202-252-7849
Candice.wong@usdoj.gov



U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia

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

November 8, 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:

1. MARKED HIGHLY SENSITIVE: Additional CCTV footage of defendant (11 files)
2. Updated JP Morgan Chase subpoena production (1 file)
3. D-14 open-source interviews relating to defendant (2 files)
4. MARKED SENSITIVE: Interviews of Officers by Statuary Hall Connector (three 302s, 1 transcript with associated audio and exhibits)

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 across the signature.

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