

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

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-CR-291-2
v.	:	
	:	
ALBUQUERQUE HEAD,	:	
	:	
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 June 11, 2021, has been provided to the defense in this matter.

Respectfully submitted,

CHANNING D. PHILLIPS
Acting United States Attorney
D.C. Bar No. 415793

By:

/s/

TARA RAVINDRA
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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*

June 11, 2021

G. Nicholas Wallace, Esq.
Assistant Federal Defender
Federal Defender Services of Eastern Tennessee, Inc.
219 West Depot Street, Suite 200
Greeneville, Tennessee 37743
Attorney for Albuquerque Head

Re: *United States v. Albuquerque Head*
Case No. 21-CR-291 – Production #2

Dear Counsel:

We are writing to update you with additional discovery that has been provided for this case on June 11, 2021 via a shared folder on USA File Exchange, that contains the following materials:

- **FBI Documents Folder:**
 - *Items related to the GoPro Videographer (6 PDF files)*
 - [EXTERNAL EMAIL] - FW_ New Text Tip_Redacted.pdf (1 page)
 - 0176-WF-3366759_0010373_Redacted.pdf (1 page)
 - 0176-WF-3366759-Intake_0007752_Redacted.pdf (2 pages)
 - 0176-WF-3366759-Intake_0011414_Redacted.pdf (3 pages)
 - FBI San Diego - Lead Coverage EC_Redacted.pdf (3 pages)
 - Telephone_Call_from_Defense_Attorney_Lee_Stapleton_Redacted.pdf (1 pages)

Please note that the following materials have been designated as **highly sensitive materials** and are subject to the Protective Order Governing Discovery that was issued by the Court in each case:

- **Highly Sensitive Materials Folder:**

- *Surveillance Footage* (3 Windows Media Audio/Video files)
 - 0074 USCH BA Lower W Terrace Door Exterior-2021-01-06_14h30min00s000ms.asf
 - 0074 USCH BA Lower W Terrace Door Exterior-2021-01-06_14h49min00s000ms.asf
 - 0074 USCH BA Lower W Terrace Door Exterior-2021-01-06_15h30min00s000ms.asf

Please note that the following materials have been designated as **sensitive materials** and are subject to the Protective Order Governing Discovery that was issued by the Court in each case:

- **Sensitive Materials Folder:**

- *Officer MM (name is sensitive)* (4 PDF files)
 - 089B-WF-3373679_0000160_1A0000093_0000001_Redacted.pdf (2 pages)
 - 089B-WF-3373679_0000160_Redacted.pdf (2 pages)
 - Officer_MM_Interview_notes_Redacted.pdf (1 page)
 - US_Capitol_Officer_M_Interview_302_Redacted.pdf (1 page)

Body Worn Camera Materials

In addition, pursuant to our discovery obligations, we are providing download links to 111 body worn camera (“BWC”) files listed in the Excel spreadsheet that was provided to you today via email. The links should last for a year, please download before then.

Please note that this list is *over-inclusive*, as it includes potentially relevant BWC videos for this and other Lower West Terrace related cases. Out of an abundance of caution, we are making all of these BWC videos accessible to the defense so that you can analyze whether they might be relevant to your defense.

We continue to identify additional BWC related to the Lower West Terrace and will provide an additional round of potentially relevant BWC. To the extent you identify other officers with BWC that you believe might be relevant to the case, please let us know and we will do what we can to provide that BWC if it exists. In addition, my understanding is that the office is working to develop a system to make BWC available on a broader level in the coming months.

We will forward additional discovery as it becomes available. If you have any questions about the information provided above or if you have any issues accessing or downloading the materials provided, please contact the undersigned Assistant United States Attorneys.

Sincerely,

TARA RAVINDRA
CARA GARDNER
Assistant United States Attorneys

Enclosures