

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

EDWARD GEORGE JR.

Defendant.

:  
:  
:  
:  
:  
:  
:  
:  
:

Case No: 21-CR-378 (TJK)

**NOTICE OF FILING OF DISCOVERY CORRESPONDENCE**

The United States of America, by and through the United States Attorney for the District of Columbia, hereby files its September 16, 2021 discovery letter, memorializing discovery sent on that same day, which is served as an attachment via ECF on counsel for Defendant.

Respectfully submitted,

CHANNING D. PHILLIPS  
ACTING UNITED STATES ATTORNEY

By: /s/ Nadia E. Moore

Nadia E. Moore  
Assistant United States Attorney (Detailee)  
NY Bar No. 4826566  
555 4th Street, N.W.  
Washington, D.C. 20001  
(718) 254-6362  
nadia.moore@usdoj.gov



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*

September 16, 2021

Michael E. Lawlor  
Nicholas George Madiou  
Brennan, McKenna & Lawlor, Chartered  
6305 Ivy Lane, Suite 700  
Greenbelt, MD 20770  
Email: mlawlor@verizon.net; nickmadiou@gmail.com

Re: *United States v. Edward George*  
Case No. 21-CR-378 (TJK)

Dear Counsel:

I have uploaded to your account in USAFx the following discovery: all of the files listed on the attached index (Exhibit A). ***All files uploaded to USAFx will automatically be deleted after 60 days per the automatic retention policy in place. Please download the files before then.*** This material is subject to the terms of the Protective Order issued in this case.

Note that all 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, the same files will be re-produced with bates-stamps at a later date. Nevertheless, we wanted to provide you what we can now as we wait for this processing to be finalized.

You will notice that some of the files being produced refer to physical attachments that were burned to a disk. If the physical attachments were too large to send via USAFx, they will instead be provided with the formal discovery round after being processed. This includes the full copy of your client's cellphone.

The following materials are designated as SENSITIVE under the protective order in this case:

266T-TP-3409274\_0000006\_1A0000004\_0000001.pdf  
266T-TP-3409274\_0000006\_1A0000004\_0000002.pdf

266T-TP-3409274\_0000008\_1A0000007\_0000006.pdf

The following materials are designated as HIGHLY SENSITIVE under the protective order in this case:

266T-TP-3409274\_0000002.pdf  
266T-TP-3409274\_0000003.pdf  
266T-TP-3409274\_0000022.pdf  
266T-TP-3409274\_0000022\_1A0000017\_0000001.pdf  
266T-TP-3409274\_0000023.pdf  
266T-TP-3409274\_0000023\_1A0000018\_0000001.png  
266T-TP-3409274\_0000023\_1A0000018\_0000002.png  
266T-TP-3409274\_0000026\_1A0000021\_0000001.pdf  
266T-TP-3409274\_0000026\_1A0000021\_0000003.pdf

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.

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.

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.

Sincerely,

Nadia Moore  
Christopher Veatch  
William Dreher  
Assistant United States Attorneys

Enclosure(s)

**Exhibit A:**

266T-TP-3409274\_0000017.pdf  
 266T-TP-3409274\_0000017\_1A0000005\_0000001.mp4  
 266T-TP-3409274\_0000001.pdf  
 266T-TP-3409274\_0000002.pdf  
 266T-TP-3409274\_0000003.pdf  
 266T-TP-3409274\_0000003\_1A0000001\_0000001.docx  
 266T-TP-3409274\_0000004.pdf  
 266T-TP-3409274\_0000004\_1A0000002\_0000001.PNG  
 266T-TP-3409274\_0000004\_1A0000002\_0000002\_PHYSICAL.pdf  
 266T-TP-3409274\_0000005.pdf  
 266T-TP-3409274\_0000005\_1A0000003\_0000001.png  
 266T-TP-3409274\_0000005\_1A0000003\_0000002.png  
 266T-TP-3409274\_0000006.pdf  
 266T-TP-3409274\_0000006\_1A0000004\_0000001.pdf  
 266T-TP-3409274\_0000006\_1A0000004\_0000002.pdf  
 266T-TP-3409274\_0000008\_1A0000007\_0000006.pdf  
 266T-TP-3409274\_0000008\_1A0000007\_0000013.csv  
 266T-TP-3409274\_0000009.pdf  
 266T-TP-3409274\_0000009\_1A0000008\_0000001.html  
 266T-TP-3409274\_0000010.pdf  
 266T-TP-3409274\_0000010\_1A0000009\_0000001.png  
 266T-TP-3409274\_0000010\_1A0000009\_0000002.PNG  
 266T-TP-3409274\_0000010\_1A0000009\_0000003.png  
 266T-TP-3409274\_0000010\_1A0000009\_0000004.PNG  
 266T-TP-3409274\_0000011.pdf  
 266T-TP-3409274\_0000011\_1A0000010\_0000001.png  
 266T-TP-3409274\_0000011\_1A0000010\_0000002.png  
 266T-TP-3409274\_0000011\_1A0000010\_0000003.png  
 266T-TP-3409274\_0000011\_1A0000010\_0000004.png  
 266T-TP-3409274\_0000012.pdf  
 266T-TP-3409274\_0000012\_1A0000011\_0000001.jpg  
 266T-TP-3409274\_0000012\_1A0000011\_0000002.jpg  
 266T-TP-3409274\_0000012\_1A0000011\_0000003.jpg  
 266T-TP-3409274\_0000012\_1A0000011\_0000004.jpg  
 266T-TP-3409274\_0000012\_1A0000011\_0000005.jpg  
 266T-TP-3409274\_0000012\_1A0000011\_0000006.jpg  
 266T-TP-3409274\_0000012\_1A0000011\_0000007.jpg  
 266T-TP-3409274\_0000012\_1A0000011\_0000008.jpg  
 266T-TP-3409274\_0000012\_1A0000011\_0000009.jpg  
 266T-TP-3409274\_0000012\_1A0000011\_0000010.jpg  
 266T-TP-3409274\_0000012\_1A0000011\_0000011.jpg  
 266T-TP-3409274\_0000012\_1A0000011\_0000012.jpg

266T-TP-3409274\_0000012\_1A0000012\_0000001.mp4  
 266T-TP-3409274\_0000012\_1A0000011\_0000013.jpg  
 266T-TP-3409274\_0000014.pdf  
 266T-TP-3409274\_0000014\_1A0000013\_0000001.JPG  
 266T-TP-3409274\_0000014\_1A0000013\_0000002.JPG  
 266T-TP-3409274\_0000014\_1A0000013\_0000003.JPG  
 266T-TP-3409274\_0000014\_1A0000013\_0000004.JPG  
 266T-TP-3409274\_0000014\_1A0000013\_0000005.JPG  
 266T-TP-3409274\_0000015.pdf  
 266T-TP-3409274\_0000015\_Import.pdf  
 266T-TP-3409274\_0000018.pdf  
 266T-TP-3409274\_0000018\_1A0000014\_0000001.jpg  
 266T-TP-3409274\_0000018\_1A0000014\_0000002.png  
 266T-TP-3409274\_0000021.pdf  
 266T-TP-3409274\_0000021\_1A0000016\_0000001.mov  
 266T-TP-3409274\_0000022.pdf  
 266T-TP-3409274\_0000022\_1A0000017\_0000001.pdf  
 266T-TP-3409274\_0000022\_1A0000017\_0000002.pdf  
 266T-TP-3409274\_0000023.pdf  
 266T-TP-3409274\_0000023\_1A0000018\_0000001.png  
 266T-TP-3409274\_0000023\_1A0000018\_0000002.png  
 266T-TP-3409274\_0000023\_1A0000018\_0000004.mov  
 266T-TP-3409274\_0000023\_1A0000018\_0000005.jpg  
 266T-TP-3409274\_0000025.pdf  
 266T-TP-3409274\_0000026.pdf  
 266T-TP-3409274\_0000026\_1A0000021\_0000001.pdf  
 266T-TP-3409274\_0000026\_1A0000021\_0000003.pdf  
 266T-TP-3409274\_0000027.pdf  
 266T-TP-3409274\_0000027\_1A0000022\_0000001.msg  
 266T-TP-3409274\_0000028.pdf  
 266T-TP-3409274\_0000028\_1A0000012\_0000001\_PHYSICAL.pdf  
 266T-TP-3409274\_0000028\_1A0000013\_0000001.docx  
 266T-TP-3409274\_0000029.pdf  
 266T-TP-3409274\_0000029\_1A0000025\_0000002.jpg  
 266T-TP-3409274\_0000031.pdf  
 266T-TP-3409274\_0000031\_1A0000028\_0000001.pdf  
 266T-TP-3409274\_0000031\_1A0000028\_0000002.pdf  
 266T-TP-3409274\_0000032.pdf  
 266T-TP-3409274\_0000032\_Import.rtf  
 266T-TP-3409274\_0000032\_1A0000029\_0000001.pdf  
 266T-TP-3409274\_0000032\_1A0000029\_0000002.pdf  
 266T-TP-3409274\_0000033.pdf  
 266T-TP-3409274\_0000033\_1A0000030\_0000001.jpg  
 266T-TP-3409274\_0000033\_1A0000030\_0000002.jpg

266T-TP-3409274\_0000034.pdf  
266T-TP-3409274\_0000035.pdf  
266T-TP-3409274\_0000035\_1A0000032\_0000001\_PHYSICAL.pdf  
266T-TP-3409274\_0000036.pdf  
266T-TP-3409274\_0000036\_1A0000033\_0000001.pdf  
266T-TP-3409274\_0000037.pdf  
266T-TP-3409274\_0000038.pdf  
266T-TP-3409274\_0000039.pdf  
266T-TP-3409274\_0000039\_1A0000034\_0000001\_PHYSICAL.pdf  
266T-TP-3409274\_0000040.pdf  
266T-TP-3409274\_0000040\_1A0000035\_0000001.pdf  
266T-TP-3409274\_0000040\_1A0000035\_0000002.pdf  
266T-TP-3409274\_0000040\_1A0000035\_0000004.pdf  
266T-TP-3409274\_0000040\_1A0000035\_0000005.pdf  
266T-TP-3409274\_0000040\_1A0000035\_0000006.pdf  
266T-TP-3409274\_0000040\_1A0000035\_0000007\_PHYSICAL.pdf  
266T-TP-3409274\_0000041.pdf  
266T-TP-3409274\_0000041\_1A0000036\_0000001.pdf  
266T-TP-3409274\_0000042.pdf  
266T-TP-3409274\_0000042\_1A0000037\_0000001.pdf  
266T-TP-3409274\_0000043.pdf  
266T-TP-3409274\_0000043\_1A0000038\_0000001.pdf  
266T-TP-3409274\_0000044.pdf  
266T-TP-3409274\_0000044\_1A0000039\_0000001.pdf  
266T-TP-3409274\_0000044\_1A0000040\_0000001.pdf  
266T-TP-3409274\_0000045.pdf  
266T-TP-3409274\_0000046.pdf  
266T-TP-3409274\_0000047.pdf  
266T-TP-3409274\_0000047\_Import.pdf  
266T-TP-3409274\_0000048.pdf  
266T-TP-3409274\_0000048\_1A0000041\_0000001.pdf  
266T-TP-3409274\_0000048\_1A0000041\_0000002.pdf  
266T-TP-3409274\_0000048\_1A0000041\_0000003.pdf  
266T-TP-3409274\_0000050.pdf  
266T-TP-3409274\_0000050\_1A0000043\_0000001.pdf  
266T-TP-3409274\_0000050\_1A0000043\_0000002.pdf  
266T-TP-3409274\_0000050\_1A0000043\_0000003.pdf  
266T-TP-3409274\_0000051.pdf  
266T-TP-3409274\_0000051\_1A0000044\_0000001.pdf  
266T-TP-3409274\_0000053.pdf  
266T-TP-3409274\_0000054.pdf  
266T-TP-3409274\_0000058.pdf  
266T-TP-3409274\_0000059.pdf  
266T-TP-3409274\_0000059\_1A0000048\_0000001.pdf

266T-TP-3409274\_0000060.pdf  
 266T-TP-3409274\_0000060\_1A0000049\_0000001.jpg  
 266T-TP-3409274\_0000060\_1A0000049\_0000002.jpg  
 266T-TP-3409274\_0000060\_1A0000049\_0000003.jpg  
 266T-TP-3409274\_0000060\_1A0000050\_0000001.pdf  
 266T-TP-3409274\_0000060\_1A0000050\_0000002.pdf  
 266T-TP-3409274\_0000060\_1A0000050\_0000003.pdf  
 266T-TP-3409274\_0000060\_1A0000050\_0000004.pdf  
 266T-TP-3409274\_0000060\_1A0000050\_0000005.pdf  
 266T-TP-3409274\_0000060\_1A0000050\_0000006.pdf  
 266T-TP-3409274-GJ\_0000001.pdf  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000001.pdf  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000002.pdf  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000003.pdf  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000004.pdf  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000005.pdf  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000006.txt  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000007.txt  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000008.TIF  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000009.txt  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000011.txt  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000012.txt  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000013.txt  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000014.txt  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000015.txt  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000016.pdf  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000017.pdf  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000018.pdf  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000019.txt  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000020.pdf  
 266T-TP-3409274-GJ\_0000002\_1A0000001\_0000021.pdf  
 266T-TP-3409274-GJ\_0000003\_1A0000002\_0000001.txt  
 266T-TP-3409274-GJ\_0000003\_1A0000002\_0000002.txt  
 266T-TP-3409274-GJ\_0000003\_1A0000002\_0000003.pdf  
 266T-TP-3409274-GJ\_0000003\_1A0000002\_0000004.txt  
 266T-TP-3409274-GJ\_0000003\_1A0000002\_0000005.html  
 266T-TP-3409274-GJ\_0000004\_1A0000003\_0000001.xlsx  
 266T-TP-3409274-GJ\_0000004\_1A0000003\_0000002.pdf  
 266T-TP-3409274-GJ\_0000005\_1A0000004\_0000002.pdf  
 266T-TP-3409274-GJ\_0000006\_1A0000005\_0000001.xlsx  
 266T-TP-3409274-GJ\_0000007\_1A0000006\_0000001.pdf  
 266T-TP-3409274-GJ\_0000009\_1A0000007\_0000002.pdf  
 266T-TP-3409274-GJ\_0000009\_1A0000007\_0000003.pdf  
 266T-TP-3409274-GJ\_0000009\_1A0000007\_0000004.pdf



266T-TP-3409274-GJ\_0000010\_1A0000008\_0000001.pdf  
266T-TP-3409274-GJ\_0000012\_1A0000011\_0000001.pdf  
266T-TP-3409274-GJ\_0000012\_1A0000010\_0000002.pdf  
266T-TP-3409274-GJ\_0000012\_1A0000012\_0000002.pdf  
266T-TP-3409274-GJ\_0000013\_1A0000013\_0000006.pdf