

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-CR-237 (RDM)
	:	
JONATHANPETER ALLEN KLEIN and	:	
MATTHEW LELAND KLEIN,	:	
	:	
Defendants.	:	

**GOVERNMENT’S SECOND NOTICE
REGARDING DISCOVERY CORRESPONDENCE**

The United States of America, by and through undersigned counsel, respectfully submits this second notice of its correspondence to defense counsel regarding discovery productions to date. Filed as attachments to this notice are emails to counsel containing information regarding the items tendered. The emails are identified in the following chart, which includes the number of the attachment as well as the date and recipient of the correspondence.

Attachment	Letter Date	Recipient(s)
1	May 28, 2021	Counsel for Defendant Jonathanpeter Klein
2	May 28, 2021	Counsel for Defendant Matthew Klein
3	June 1, 2021	Counsel for Defendant Matthew Klein ¹

Respectfully submitted,

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

By: /s/ Christopher K. Veatch
CHRISTOPHER K. VEATCH
Assistant United States Attorney, Detailee
IL Bar No. 6276097
219 S. Dearborn Street, 5th Floor
Chicago, Illinois 60604

¹ A portion of this email containing information which is not descriptive of the government’s production has been deleted. An unredacted version of this email was received by counsel and is available for the Court’s inspection upon request.

christopher.veatch@usdoj.gov
(312) 886-3389

From: [Veatch, Christopher \(USAILN\)](#)
To: "Michelle Sweet"
Subject: U.S. v. Jonathanpeter Klein - Preliminary Video Discovery
Date: Friday, May 28, 2021 11:59:00 AM

Hello Michelle,

I have prepared another tranche of preliminary discovery consisting of open source videos relating to Mr. Klein and his brother's conduct. They are uploaded to USAfx and are in the .zip files named **5.28.2021 Preliminary Video Discovery (Non-Sensitive) Part 1.zip** and **5.28.2021 Preliminary Video Discovery (Non-Sensitive) Part 2.zip**.

As we continue to prepare the materials for formal discovery, please let me know if there are any items you would like me to prioritize or which I may be able to turnover in preliminary discovery. Should you wish to discuss this, I am available at your convenience.

Thank you!
Chris

Christopher K. Veatch
Assistant U.S. Attorney | N.D. of Illinois (on detail to the District of Columbia)
219 S. Dearborn Street, 5th Floor, Chicago, IL 60604 | 312-886-3389 | christopher.veatch@usdoj.gov

From: [Veatch, Christopher \(USAILN\)](#)
To: "Steve Kiersh"
Subject: U.S. v. Jonathanpeter Klein - Preliminary Video Discovery
Date: Friday, May 28, 2021 12:01:00 PM

Hello Steve,

I have prepared another tranche of preliminary discovery consisting of open source videos relating to Mr. Klein and his brother's conduct. They are uploaded to USAfx and are in the .zip files named **5.28.2021 Preliminary Video Discovery (Non-Sensitive) Part 1.zip** and **5.28.2021 Preliminary Video Discovery (Non-Sensitive) Part 2.zip**.

As we continue to prepare the materials for formal discovery, please let me know if there are any items you would like me to prioritize or which I may be able to turnover in preliminary discovery. Should you wish to discuss this, I am available at your convenience.

Once Mr. Gorokhov is officially in this case, if applicable, I will forward him the links as well.

Thank you!
Chris

Christopher K. Veatch
Assistant U.S. Attorney | N.D. of Illinois (on detail to the District of Columbia)
219 S. Dearborn Street, 5th Floor, Chicago, IL 60604 | 312-886-3389 | christopher.veatch@usdoj.gov

From: [Veatch, Christopher \(USAILN\)](#)
To: [Eugene Gorokhov](#)
Subject: U.S. v. Matthew Klein - Previously Produced Items
Date: Tuesday, June 1, 2021 3:49:00 PM
Attachments: [5.5.2021 Preliminary Discovery Letter to Counsel \(U.S. v. J&M Klein\).pdf](#)

Hello Eugene,

Please see the attached letter, which was sent to prior counsel – Steve Kiersh.

I will be sending you an invitation to the USAfx folder for this matter. The files for preliminary discovery are found within the zip files named “5.5.2021 Preliminary Discovery – Updated”; “5.28.2021 Preliminary Video Discovery (Non-Sensitive) Part 1”; and “5.28.2021 Preliminary Video Discovery (Non-Sensitive) Part 2.” [REDACTED]

Please let me know if you have any questions, as well as if there are certain items you would like access to as we prepare formal discovery.

Thanks!
Chris

Christopher K. Veatch
Assistant U.S. Attorney | N.D. of Illinois (on detail to the District of Columbia)
219 S. Dearborn Street, 5th Floor, Chicago, IL 60604 | 312-886-3389 | christopher.veatch@usdoj.gov