

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

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<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	CRIMINAL CASE No: 1:21-CR-0382-PLF
	)	
<b>CHRISTOPHER WARNAGIRIS,</b>	)	BENCH TRIAL: NOVEMBER 8, 2023
	)	
DEFENDANT.	)	
_____	)	

**SUPPLEMENT TO MOTION FOR BRADY MATERIALS**

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The Defense has learned that the Government has the technical capability to run a face-trace review of officer body-worn cameras.

Such a trace was run on Mr. Warnagiris and provided to the Defense on September 27, 2023, for the first time (Mr. Warnagiris was arrested over two years ago).

Accordingly, to supplement the requests made in ECF No. 62 and 75, the Defense adds to this request that the DOJ produce material, exculpatory, and favorable evidence in its exclusive possession and control, namely a face-trace list of body-worn camera recordings capturing Officer Anthony Warner and production of the digital files of these body-worn camera recordings.

For the same reasons stated in ECF No. 62 and 75, the Defense cannot run a face trace of the Government’s body-worn camera database, while the Government can. Even if all bodyworn videos were made available to the defense through discovery (there are tens of thousands of videos, maybe more, made available to the defense through the Deloitte and Evidence.com

databases) the defense has no meaningful way to review the footage for utility. The Government did not even sort the videos in any usable format such as by time or name of officer. As opposing counsel stated in an email to the Defense regarding file sorting — “The file names do not reflect the actual start time of the video clips. Rather they are based off of the start time listed in the file names on evidence.com.”

This face-trace tool is the only utility capable of sorting and applying digital evidence to a case; and, as explained in the prior filings, the evidence requested by the Defense is directly relevant and material to the defense. The Government has a duty to learn what their agents, the individuals operating the face-trace tools, can provide about Officer Anthony Warner.

Respectfully submitted,

By Counsel:

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MARINA MEDVIN, ESQ.  
*Counsel for Defendant*  
MEDVIN LAW PLC  
916 Prince Street  
Alexandria, Virginia 22314  
Tel: 888.886.4127  
Email: contact@medvinlaw.com

**CERTIFICATE OF SERVICE FOR CM/ECF**

I hereby certify that on September 28, 2023, I will electronically file the foregoing with the Clerk of the Court for the United States District Court for the District of Columbia by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users, and that service will be accomplished by the CM/ECF system.

\_\_\_\_\_/s/\_\_\_\_\_  
Marina Medvin, Esq.