

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : Case No. 1:21-cr-382 (PLF)
 :
 CHRISTOPHER WARNAGIRIS, :
 :
 Defendant. :

**GOVERNMENT’S OPPOSITION TO DEFENDANT’S
SUPPLEMENTAL MOTION FOR *BRADY* MATERIAL**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, respectfully opposes the defendant’s supplemental motion for *Brady* material. The defendant’s motion is based on a fundamental misunderstanding of the law, specifically a belief that “[t]he Government has a *duty* to learn what their agents, the individuals operating the face-trace tools, can provide about” a police officer witness. ECF No. 80 at 2 (emphasis added). Unsurprisingly, the defendant cites no case law or statute to support this claim because none exists. The government has no such duty to conduct investigation; the government is only obligated—by Fed. R. Crim. P. 16 and *Brady*—to turn over to the defendant materials in its possession. *See* ECF No. 73 (discussing the legal standard for the government’s discovery obligations). The government has already done so.

Respectfully submitted,

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