

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

UNITED STATES OF AMERICA

v.

KUEHNE ET AL.,

Defendants.

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Case No. 21-cr-160 (TJK)

NOTICE OF FILING

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 August 12, 2021, has been provided to respective defense counsel in this matter.

Respectfully submitted,

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/s/Christopher A. Berridge
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U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

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*Judiciary Center
555 Fourth St., N.W.
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August 12, 2021

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Re: *United States v. Kuehne et al.*; 21-cr-160 (TJK)

Dear Defense Counsel:

This letter serves to formally notify you of the following discovery that has been produced to you via USAfx at the following link, which has previous been shared via e-mail: <https://usafx.box.com/s/ooybyl8qniqh12yyo4lm6lhmvtstb26h>.

Please note that a Protective Order governing this discovery was entered on May 4, 2021 (ECF no. 71). The Order governs discovery that is deemed either “Sensitive” or “Highly Sensitive.”

Prior to the Order being entered, on April 28 and May 3, 2021 the government disclosed materials that were not subject to the Order, in a subfolder labeled “Pre-protective order discovery.” The subfolder contained a total of 467 files for “FBI Files and Attachments” split into subfolders for each defendant. Also produced approximately one dozen open-sourced videos. Undersigned counsel notified each of you of this discovery via email.

After the Order was entered, on June 9, 2021, the government disclosed nine files, specifically U.S Capitol surveillance video, marked as “Highly Sensitive” and 223 FBI files and attachments, interviews, recorded phones calls, and U.S. Capitol Police photographs and videos marked as “Sensitive” pursuant to the Order. The government additionally provided 24 files that were not subject to the Order that had not been disclosed previously, which included other open source videos and videos captured by Defendant Chrestman. Undersigned counsel again notified each of you of this discovery via email.

On June 23, 2021, the government disclosed one additional, 30-minute U.S. Capitol surveillance video depicting your clients’ conduct near the “Crypt” of the Capitol, marked as “Highly Sensitive.” The government added an additional 423 files marked as “Sensitive,” broken down by defendant. Undersigned counsel again notified each of you of this discovery via email.

As we have discussed, this discovery is ongoing. If you have any questions about the materials provided, please feel free to reach out using the contact information listed below and included in my emails.

Sincerely,

CHANNING PHILLIPS
Acting United States Attorney

By: _____/s/_____
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