

U.S. Department of Justice

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Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

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VIA USAFX and Email Lindy Urso, Esq. lindy@lindyursolaw.com Counsel for Defendant McCaughey

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Re: United States v. Patrick McCaughey, Tristan Stevens, Christopher Quaglin, and David Judd 21-CR-40 (TNM) - Production 8

## Dear Counsel:

Pursuant to our discovery obligations, we are providing download links to an additional 103 body worn camera (BWC) files listed in the tab called "Round 2" in the attached Excel spreadsheet. The links should last for a year, please download before then. This should include any BWC videos mentioned in the discovery recently provided.

(This list is *over-inclusive*, as it includes all additionally potentially relevant BWC videos that I have seen during the review for this and other Lower West Terrace related cases. Out of an

abundance of caution, we are making all of these BWC videos accessible to the defense so that you can analyze whether they might be relevant to your defense.)

My understanding is that the office is working to develop a system to make BWC available on a broader level in the coming months – along with additional files. We continue to identify additional BWC related to the Lower West Terrace and will provide an additional round of potentially relevant BWC in the next few weeks – assuming that the database or system that the office is putting in place is not available by then. In the meantime, to the extent you identify other officers with BWC that you believe might be relevant to the case, please let us know and we will do what we can to provide that BWC if it exists.

If you have any questions, please feel free to contact me.

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Enclosure(s):

cc: