



U.S. Department of Justice

Matthew M. Graves  
United States Attorney

*District of Columbia*

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

December 6, 2021

Via Email

Steven Kiersh  
Counsel for John Earle Sullivan  
5335 Wisconsin Avenue, N.W., Suite 440  
Washington, D.C. 20015  
skiersh@aol.com

Re: *United States v. John Earle Sullivan*  
Case No. 1:21-cr-00078-EGS

Dear Counsel:

The enclosed letter memorializes the provision of the following additional discovery in this case, via filesharing (unless otherwise indicated):

1. 7-page Intermountain West RCFL report regarding extractions of seized devices (also transmitted via email on 11/17/2021)
2. Preliminarily scoped extractions from defendant's extracted, seized devices (includes 5 folders: "\_img," "\_style," "FileList," "Photos," and "Report" hard drive; in turn, the "Report" folder includes 4 subfolders: "Audio\_Voicemail," "Discord," "Full" and "iphone") (separately transmitted via external hard drive)
3. YouTube search warrant production for 9/13/2021 warrant (6 folders) (separately transmitted via external hard drive)
4. 302s reviewing additional CCTV of defendant dated 10/14/2021 and 11/8/2021
5. 302 reviewing YouTube search warrant returns dated 10/14/2021
6. YouTube second search warrant dated 11/18/2021 and return
7. Search warrant photos (377 files, zipped)
8. Twitter search warrant production retransmitted in different format (organized by 10 username folders rather than URLs #1-5) (zipped)

9. SENSITIVE: D-14 video of exit from House door obtained through legal process (“IMG\_0774”)
10. D-14 open-source interview relating to defendant from 1/8/2021
11. Defendant video from on or about 1/9/2021 posted at <https://www.youtube.com/watch?v=sLVU0sVhcL8&t=336s>
  - a. “John Sullivan (Jayden X), the BLM activist guy, who recorded Ashli Babbitt’s death in the Capitol”
12. Three additional YouTube videos of defendant:
  - a. “Capitol Police Planned the Attack on the U.S. Capitol”
  - b. “Frontline Footage Of Inside The U.S. Capitol Riot”
  - c. “Unseen Footage Before The U.S. Capitol Riot”

The discovery is unencrypted. Please contact me if you have any issues accessing the information, and to confer regarding pretrial discovery as provided in Fed. R. Crim. P. 16.1.

This material is being provided pursuant to the Protective Order issued in this case. Please adhere to sensitivity markings.

I will forward additional discovery as it becomes available. If you have any questions, please feel free to contact me.

Sincerely,



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