



U.S. Department of Justice

Matthew M. Graves  
United States Attorney

*District of Columbia*

---

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

December 10, 2021

Via Email

Don Flanary  
Counsel for Samuel Montoya  
Flanary Law Firm, PLLC  
214 E. Ashby Place  
San Antonio, Texas 78212  
[donflanary@hotmail.com](mailto:donflanary@hotmail.com)

Re: *United States v. Samuel Montoya*  
Case No. 1:21-cr-336

Dear Counsel:

The enclosed memorializes the provision of the following additional discovery in this case, via filesharing:

1. FBI Serial 24 (redacted 302)
2. SENSITIVE: Officer interviews from Statuary Hall Connector (7 files):
  - a. 302s for Officers VB, SV, and MM
  - b. Transcript, audio, and 2 exhibits for Officer NE

The materials are provided pursuant to the Protective Order entered in this case. Please adhere to sensitivity markings.

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.

I request reciprocal discovery to the fullest extent provided by Rule 16 of the Federal Rules of Criminal Procedure, including results or reports of any physical or mental examinations, or scientific tests or experiments, and any expert witness summaries. I also request that the defendant disclose prior statements of any witnesses the defendant intends to call to testify at any hearing or trial. *See* Fed. R. Crim. P. 26.2; *United States v. Nobles*, 422 U.S. 255 (1975). I

request that such material be provided on the same basis upon which the government will provide the defendant with materials relating to government witnesses.

Additionally, pursuant to Federal Rules of Criminal Procedure 12.1, 12.2, and 12.3, I request that the defendant provide the government with the appropriate written notice if the defendant plans to use one of the defenses referenced in those rules. Please provide any notice within the time period required by the Rules or allowed by the Court for the filing of any pretrial motions.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Candice", written over a horizontal line.

Candice C. Wong  
Assistant United States Attorney  
202-252-7849  
Candice.wong@usdoj.gov