



U.S. Department of Justice

CHANNING D. PHILLIPS
Acting United States Attorney

District of Columbia

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

August 11, 2021

VIA EMAIL

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Re: *United States v. Kristi Munn, et al.*
Case No. 21-cr-474-BAH

Dear Counsel:

This is to memorialize the following preliminary discovery sent you via email **on August 11, 2021** via USAfx which contained the following files as set forth in Attachment A to this correspondence.

Due to the extraordinary nature of the January 6, 2021 Capitol Attack, the government anticipates that a large volume of materials may contain information relevant to this prosecution. These materials may include, but are not limited to, surveillance video, statements of similarly situated defendants, forensic searches of electronic devices and social media accounts of similarly situated defendants, and citizen tips. The government is working to develop a system that will facilitate access to these materials. In the meantime, please let me know if there are any categories of information that you believe are particularly relevant to your client.

The discovery is unencrypted. Please contact us 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 subject to the terms of the Protective Order issued in this case.

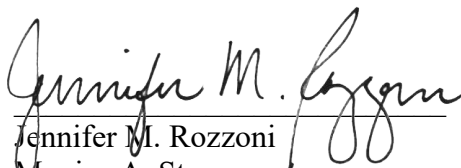
We recognize the government's discovery obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), its progeny, and Rule 16. I will provide timely disclosure if any such material comes to light. Consistent with *Giglio*, *Ruiz*, and 18 U.S.C. § 3500, I will provide information about government witnesses prior to trial and in compliance with the court's trial management order.

We 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. We also request that defendant(s) disclose prior statements of any witnesses defendant(s) 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). We request that such material be provided on the same basis upon which the government will provide defendant(s) with materials relating to government witnesses.

Additionally, pursuant to Federal Rules of Criminal Procedure 12.1, 12.2, and 12.3, We request that defendants provide the government with the appropriate written notice if defendants 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.

We will forward additional discovery in the coming weeks. If you have any questions, please feel free to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer M. Rozzoni". The signature is written in a cursive style with a horizontal line underneath the name.

Jennifer M. Rozzoni

Monica A. Stump

Assistant United States Attorneys

Enclosure(s)

Attachment A

Timeline Videos – HIGHLY SENSITIVE folder

20210106-FELONYRIOTING-CAPITAL_BUILDING.mp4_clip_1633_1656.mp4
Crypt East - 2021-01-06_19h20min01s.mp4_clip_588_639.mp4
Crypt Lobby East - 2021-01-06_19h19min01s.mp4_clip_690_738.mp4
Crypt Lobby East - 2021-01-06_19h31min20s.mp4_clip_0_309.mp4
Memorial Door - 2021-01-06_19h31min24s.mp4_clip_865_910.mp4
SenateWingDoornearS139_2021-01-06_14h20min18s087ms.mp4_clip_294_326.mp4
SenateWingDoornearS139_2021-01-06_15h13min58s920ms.mp4_clip_155_211.mp4

USCP Surveillance Footage – HIGHLY SENSITIVE folder

East Rotunda Door Interior folder

East Rotunda Door Interior - 2021-01-06_19h53min48s.mp4
East Rotunda Door Interior - 2021-01-06_20h29min36s.mp4
East Rotunda Door Interior-2021-01-06_14h15min00s000ms.mp4
East Rotunda Door Interior-2021-01-06_14h43min05s000ms.mp4
East Rotunda Door Interior-2021-01-06_15h00min00s000ms.mp4
East Rotunda Door Interior-2021-01-06_15h28min00s000ms.asf

Rotunda Door Interior folder

Rotunda Door Interior-2021-01-06_14h15min00s000ms.asf
Rotunda Door Interior-2021-01-06_14h43min05s000ms.mp4

Rotunda Lobby East folder

Rotunda Lobby East Stairs-2021-01-06_14h36min50s000ms.asf
Rotunda Lobby East Stairs-2021-01-06_14h38min53s000ms.asf
Rotunda Lobby East Stairs-2021-01-06_14h46min39s000ms.mp4
Rotunda Lobby East Stairs-2021-01-06_14h46min59s000ms.mp4
Rotunda Lobby East Stairs-2021-01-06_15h01min12s000ms.mp4
Rotunda Lobby East Stairs-2021-01-06_15h02min00s000ms.asf

Rotunda North folder

Rotunda North-2021-01-06_15h01min59s000ms.mp4
Rotunda North-2021-01-06_14h58min03s000ms.asf
Rotunda North-2021-01-06_14h28min45s000ms.asf
Rotunda North-2021-01-06_14h31min40s000ms.mp4
Rotunda North-2021-01-06_14h32min34s000ms.asf

Rotunda North-2021-01-06_14h33min45s000ms.asf
Rotunda North-2021-01-06_14h41min10s000ms.asf
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Rotunda North-2021-01-06_14h46min59s000ms.mp4
Rotunda North-2021-01-06_14h51min00s000ms.mp4
Rotunda North-2021-01-06_14h51min27s000ms.asf
Rotunda North-2021-01-06_14h51min48s000ms.asf
Rotunda North-2021-01-06_14h58min03s000ms.asf
Rotunda North-2021-01-06_15h01min59s000ms.mp4
Rotunda North-2021-01-06_15h15min00s000ms.asf
RotundaNorth_2021-01-06_14h20min01s463ms.mp4
RotundaNorth_2021-01-06_14h50min24s710ms.mp4
RotundaNorth_2021-01-06_15h02min09s900ms.mp4
RotundaNorth_2021-01-06_15h11min53s727ms (h.s.).mp4

Rotunda South folder

Rotunda South - 2021-01-06_14h34min32s.mp4
Rotunda South - 2021-01-06_15h01m56s-15h07m00s.mp4
Rotunda South - 2021-01-06_19h52min26s (1).mp4
Rotunda South - 2021-01-06_20h01min22s (h.s.).mp4
Rotunda South - 2021-01-06_20h10min20s (h.s.).mp4
Rotunda South - 2021-01-06_20h19min16s (h.s.).mp4
Rotunda South-2021-01-06_14h26min19s000ms.mp4
Rotunda South-2021-01-06_14h32min34s000ms.asf
Rotunda South-2021-01-06_14h33min45s000ms.asf
Rotunda South-2021-01-06_14h42min34s000ms.asf
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Rotunda South-2021-01-06_14h51min48s000ms.asf
Rotunda South-2021-01-06_14h56min37s000ms.asf
Rotunda South-2021-01-06_14h58min03s000ms.asf
Rotunda South-2021-01-06_15h15min00s000ms.asf

Memorial_Door_-_2021-01-06_19h31min24s_1 HIGHLY SENSITIVE.mp4

Interview_of_Dawn_Munn.pdf
Interview_of_Kayli_Munn.pdf
Interview_of_Thomas_Munn.pdf