



U.S. Department of Justice

CHANNING D. PHILLIPS  
Acting United States Attorney

*District of Columbia*

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

August 23, 2021

**VIA EMAIL**

Michelle M. Peterson  
Office of the Federal Public Defender for the District of Columbia

John Phillip Calhoun  
Office of the Federal Public Defender for Western District of Texas

H. Heather Shaner  
Law Office of H. Heather Shaner

Richard Steven Stern  
Law Office of Richard S. Stern

John L. Machado  
Law Office of John Machado

Re: *United States v. Munn, et al.*,  
Case No. 21-cr-474-BAH  
Letter No. 2

Dear Counsel:

This is to memorialize the following discovery sent you on **August 19, 2021**, via USAFX which contained the following materials:

Reports of surveillance conducted on March 1, 2021, March 12, 2021, March 26, 2021, July 6, 2021, July 7, 2021, July 11, 2021, and July 12, 2021, and notes  
Requests for and Records from AT&T, and Verizon, Snap Inc.  
Opening investigation reports for Kristi, Dawn, and Thomas Munn  
Eight Screenshots of Munn family members inside the Capitol from D.Live  
Public records, such as wage, driver's license, and residential records, and criminal history records for Kristi, Dawn and Thomas Munn

Reports of image searches for Dawn and Thomas Munn  
Munn Family identification report and three photographs  
Parler search results for the Munn family  
Reports of video review and identification of the Munns, including on CCTV, publicly available videos and social media  
Report discussing Munn family travel to Washington, DC, including Facebook 10 posts and photographs  
Arrest Report of Thomas, Dawn, and Kayli Munn  
Interview reports for Kristi, Dawn and Thomas Munn and notes  
Audio of Thomas Munn's interview and Miranda form  
Six Facebook search warrants and notice of returns  
Snap Chat search warrant and notice of return  
Interview of tipsters  
Three reports of information from N. Jones and photographs  
Arrest warrants and returns for Kristi, Thomas, Kayli, Josh, and Dawn Munn  
AT&T Search warrant and return  
Reports of search and evidence seized from Jackson Street, including photograph log, sketch, notice of photographs, and evidence log  
Report on utilities checks  
Subfile opening report  
Search warrant for Avalon Street and Evidence seized

The file names for each document provided are outlined 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 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 subject to the terms of the Protective Order issued in this case.

I 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.

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 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). I 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, I request that defendant(s) provide the government with the appropriate written notice if defendant(s) 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.

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

Sincerely,

*/s/ Monica A. Stump*

Monica A. Stump  
Assistant United States Attorney

*/s/ Jennifer Rozzoni*  
Assistant United States Attorney

Enclosure(s)

**ATTACHMENT A**

**Dawn Munn -- 3385911**

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**Kristi Munn -- 3384888**

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**Thomas Munn -- 3385905**

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