
From: Emily Lambert
Sent: Tuesday, May 2, 2023 5:35 PM
To: Miller, Samantha (USADC)
Cc: John Pierce; Roger Roots; McCauley, Sean (USADC); Rummens, Brianna (USADC) [Contractor]
Subject: Re: 1:21-cr-00552-DLF USA v. THOMAS: Govt Updated Ex. List, Files, Prelim, Witness List, Brady/Giglio/Jencks

Thank you Samantha. Received

Thank You,
Em

On May 2, 2023, at 5:08 PM, Miller, Samantha (USADC) <Samantha.Miller@usdoj.gov> wrote:

John,

First, attached please find an updated Government Exhibit list. It may change slightly around the edges, but should be pretty close to final.

Second, we are also providing via USAfx the vast majority of the exhibits on the list. A few notes:

1. We are not re-providing you with the scoped Facebook return, given (a) it's a very large amount of data, (b) we previously provided it, and (c) you just re-sent it back to us in the production of defense exhibits we received yesterday.
2. We are still working to get actual files for the 700 series, however, these are open source materials, the links to which we provided long ago in case-specific discovery (see, e.g., serial 103).
3. There may be one or two other exhibits we're still working on obtaining, such as certifications, etc. We'll provide those as soon as we receive them.

Third, below please find our preliminary witness list, which is in alphabetical order. This list is subject to change, of course.

1:21-cr-00552-DLF USA v. THOMAS Govt Preliminary Witness List May 2, 2023
Alexis Brown, FBI Case Agent
Anthony Campanale, MPD

Captain Baboulis - USCP Overview
Kevin Veizaj, MPD
Matthew Nickerson, MPD
Patrick De Leano, MPD
Robert Niewenhous, MPD
Rodney Anderson, MPD
Ryan Dittmar, FBI Case Agent
Scott Ainsworth, PG PD

Fourth, attached please find our Giglio letter, which relates to the MPD witnesses. We will be providing additional materials via USAfx, including materials relating to Officer Ainsworth with PG County. We will continue to disclose anything additional we find/receive on an on-going basis.

Thank you,

Samantha

—

Samantha R. Miller
Assistant United States Attorney
United States Attorney's Office | District of Columbia
Email: samantha.miller@usdoj.gov
Desk Tel: (202) 252-7014

From: Miller, Samantha (USADC)
Sent: Sunday, April 30, 2023 6:19 PM
To: 'Emily Lambert' <elambert@johnpiercelaw.com>; John Pierce <jpierce@johnpiercelaw.com>
Cc: Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC) <SMcCauley@usa.doj.gov>; Rummens, Brianna (USADC) [Contractor] <BRummens@usa.doj.gov>
Subject: RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Noted, thank you.

—

Samantha R. Miller
Assistant United States Attorney
United States Attorney's Office | District of Columbia
Email: samantha.miller@usdoj.gov
Desk Tel: (202) 252-7014

From: Emily Lambert <elambert@johnpiercelaw.com>
Sent: Sunday, April 30, 2023 4:48 PM
To: Miller, Samantha (USADC) <SMiller1@usa.doj.gov>; John Pierce

<jpierce@johnpiercelaw.com>

Cc: Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC)

<SMcCauley@usa.doj.gov>; Rummens, Brianna (USADC) [Contractor]

<BRummens@usa.doj.gov>

Subject: [EXTERNAL] RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Hi Samantha,

As an update, I'm working on transferring and uploading these files to a dropbox, and will send you the link by the end of the day. Thanks

Respectfully,
Em Lambert
Client Advocate
John Pierce Law
P: (662) 665-1061
21550 Oxnard Street
3rd Floor PMB #172
Woodland Hills, CA 91367

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From: [Miller, Samantha \(USADC\)](#)

Sent: Friday, April 28, 2023 4:28 PM

To: [Emily Lambert](#); [John Pierce](#)

Cc: [Roger Roots](#); [McCauley, Sean \(USADC\)](#); [Rummens, Brianna \(USADC\) \[Contractor\]](#)

Subject: RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Ms. Lambert, thank you. When can we expect to receive these files?

Thanks,

Samantha

—

Samantha R. Miller

Assistant United States Attorney

United States Attorney's Office | District of Columbia

Email: samantha.miller@usdoj.gov

Desk Tel: (202) 252-7014

From: Emily Lambert <elambert@johnpiercelaw.com>

Sent: Friday, April 28, 2023 2:13 PM

To: Miller, Samantha (USADC) <SMiller1@usa.doj.gov>; John Pierce

<jpierce@johnpiercelaw.com>

Cc: Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC)

<SMcCauley@usa.doj.gov>; Rummens, Brianna (USADC) [Contractor]

<BRummens@usa.doj.gov>

Subject: [EXTERNAL] RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Hi Samantha, thanks for your patience. Here is the preliminary exhibit list. Thank you in advance

Respectfully,
Em Lambert
Client Advocate
John Pierce Law
P: (662) 665-1061
21550 Oxnard Street
3rd Floor PMB #172
Woodland Hills, CA 91367

<image001.png>

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From: [Miller, Samantha \(USADC\)](#)

Sent: Friday, April 28, 2023 11:37 AM

To: [John Pierce](#); [Emily Lambert](#)

Cc: [Roger Roots](#); [McCauley, Sean \(USADC\)](#); [Rummens, Brianna \(USADC\) \[Contractor\]](#)

Subject: RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Ok. Thank you.

—

Samantha R. Miller
Assistant United States Attorney
United States Attorney's Office | District of Columbia
Email: samantha.miller@usdoj.gov
Desk Tel: (202) 252-7014

From: John Pierce <jpierce@johnpiercelaw.com>

Sent: Friday, April 28, 2023 11:25 AM

To: Miller, Samantha (USADC) <SMiller1@usa.doj.gov>; Emily Lambert

<elambert@johnpiercelaw.com>

Cc: Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC)

<SMcCauley@usa.doj.gov>; Rummens, Brianna (USADC) [Contractor]

<BRummens@usa.doj.gov>

Subject: [EXTERNAL] RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Hi Samantha. Em says she should be able to get to you by tonight. Thx, John

From: Miller, Samantha (USADC) <Samantha.Miller@usdoj.gov>
Sent: Friday, April 28, 2023 10:57 AM
To: John Pierce <jpierce@johnpiercelaw.com>; Emily Lambert <elambert@johnpiercelaw.com>
Cc: Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC) <Sean.McCauley@usdoj.gov>; Rummens, Brianna (USADC) [Contractor] <Brianna.Rummens@usdoj.gov>
Subject: RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

John,

After internal discussion and further review of deadlines, because the pre-trial conference is a week from Monday, we do not anticipate Judge Friedrich taking too kindly to any extension requests, but certainly not any beyond next Friday, 5/5.

Therefore, we would like your exhibit list by end of day today, which will give us the weekend to review and, hopefully, avoid any need for an extension request. Once we have the list, we'll let you know whether we anticipate needing to request until 5/5 to submit our objections.

Please confirm.

Thank you,

Samantha

—

Samantha R. Miller
Assistant United States Attorney
United States Attorney's Office | District of Columbia
Email: samantha.miller@usdoj.gov
Desk Tel: (202) 252-7014

From: John Pierce <jpierce@johnpiercelaw.com>
Sent: Friday, April 28, 2023 8:12 AM
To: Miller, Samantha (USADC) <SMiller1@usa.doj.gov>; Emily Lambert <elambert@johnpiercelaw.com>
Cc: Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC) <SMcCauley@usa.doj.gov>; Rummens, Brianna (USADC) [Contractor] <BRummens@usa.doj.gov>
Subject: [EXTERNAL] Re: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

We would definitely not oppose additional time that you need Samantha. Thank you.

John

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From: Miller, Samantha (USADC) <Samantha.Miller@usdoj.gov>

Sent: Friday, April 28, 2023 8:08:12 AM

To: Emily Lambert <elambert@johnpiercelaw.com>

Cc: John Pierce <jpierce@johnpiercelaw.com>; Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC) <Sean.McCauley@usdoj.gov>; Rummens, Brianna (USADC) [Contractor] <Brianna.Rummens@usdoj.gov>

Subject: RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Ms. Lambert, Good Morning,

The deadline of April 26, 2023 to exchange exhibit lists was court imposed, not imposed by the government. The scheduling order does not require the exhibits, themselves, to be turned over at that time. However, because we have not received your exhibit list yet, we may need to request additional time from the Court to file any objections to the list, given it was already a fairly tight turn-around for review and objections.

Thank you,

Samantha

—

Samantha R. Miller

Assistant United States Attorney

United States Attorney's Office | District of Columbia

Email: samantha.miller@usdoj.gov

Desk Tel: (202) 252-7014

From: Emily Lambert <elambert@johnpiercelaw.com>

Sent: Thursday, April 27, 2023 8:29 PM

To: Miller, Samantha (USADC) <SMiller1@usa.doj.gov>

Cc: John Pierce <jpierce@johnpiercelaw.com>; Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC) <SMcCauley@usa.doj.gov>; Rummens, Brianna (USADC) [Contractor] <BRummens@usa.doj.gov>

Subject: [EXTERNAL] Re: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Thank you Samantha. I am having a few computer issues tonight, would it be alright if I send our list and exhibits over to you tomorrow?

Thank You,

Em

On Apr 26, 2023, at 11:31 PM, Miller, Samantha (USADC) <Samantha.Miller@usdoj.gov> wrote:

John and Roger,

Pursuant to the Court's Scheduling Order (ECF No. 66), attached please find the Government's preliminary exhibit list.

Thank you,

Samantha

—

Samantha R. Miller

Assistant United States Attorney

United States Attorney's Office | District of Columbia

Email: samantha.miller@usdoj.gov

Desk Tel: (202) 252-7014