

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

KENNETH HARRELSON

Defendant

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)
) **Criminal No. 1:22-cr-00015-APM**
) ***USA v. Stewart Rhodes, et al.***
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EXHIBIT B – CHECKLIST OF CLAIMED BUT MISSING PRODUCTIONS

The Government chronicles on pages 3 and 4 disclosures that it believes it has already produced disclosures including --

- U.S. House of Representatives and U.S. Senate Recording Studio footage;¹
- Reports (including video and audio exhibits) arising from investigations into allegations of officer misconduct on or about January 6, 2021;
- Video recorded by the D.C. Metropolitan Police Department’s Electronic Surveillance Unit;
- The results of searches of 600 digital devices and 133 Stored Communications Act (“SCA”) accounts;
- 238 digitally recorded interviews of investigation subjects;
- Radio communications from multiple law enforcement agencies;
- 1,149 FBI FD-302s and related attachments (FD-302s generally consist of memoranda of interviews and other investigative steps);
- 82,084 (redacted or anonymous) tips;
- Search warrant documents related to the government’s collection of comprehensive data from the Capitol’s cell tower infrastructure and the collection of geolocation information for the Capitol and restricted perimeter;
- Case-specific information obtained in connection with the investigation of numerous subjects whose cases have not yet been disposed and whose investigations may be on-going;

¹ It is not clear what “Recording Studio footage” means.

- Files provided to the government by multiple law enforcement agencies in response to Rule 16 requests for any potentially discoverable information, including information about individuals who have not been charged;
- Documents the government will use to prove interstate commerce was affected; and
- Documents related to the whereabouts of Vice President Pence on January 6, 2021.

The Government further claims on page 4 that

All Relativity productions are accompanied by cover letters

describing the contents of the production and indexes that provide

further detail.