

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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|--------------------------|---|--------------------|
| UNITED STATES OF AMERICA | : | |
| | : | |
| v. | : | Case No. 21-mj-550 |
| | : | |
| CYNTHIA BALLENGER, and | : | |
| CHRISTOPHER PRICE, | : | |
| | : | |
| | : | |
| Defendants. | : | |

NOTICE OF FILING

The United States requests that the attached discovery letters be made part of the record in this case.

Respectfully submitted,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY
D.C. Bar No. 415793

By: /s/ Jacob R. Steiner
Jacob R. Steiner
California Bar No. 325239
Trial Attorney, Detailee
United States Attorney's Office
555 Fourth Street, N.W.
Washington, DC 20530
Phone: (202) 924-5829
Jacob.Steiner@usdoj.gov

CERTIFICATE OF SERVICE

On September 29, 2021, a copy of the foregoing notice and attached discovery letters were served on counsel for defendant through the Court's Electronic Filing System and by email with the listed attachments provided to counsel through the means described in the discovery letter.

/s/ Jacob R. Steiner
Jacob R. Steiner
Trial Attorney, Detailee



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

September 29, 2021

BY EMAIL

Steven H. Levin
Rosenberg Martin Greenberg, LLP
25 South Charles Street, 21st Floor
Baltimore, Maryland 21201
slevin@rosenbergmartin.com

Re: United States v. Cynthia Ballenger & Christopher Price, Case No. 21-mj-550

Dear Mr. Levin:

Attached please find a guide to additional discovery in this matter, which is being provided through a shared folder on USA File Exchange (USAFX) titled "US v. Price & Ballenger (Discovery)."

These items are being provided pursuant to the agreed upon protective order, and pursuant to that order certain items may be designated as "SENSITIVE" or "HIGHLY SENSITIVE" in the list below and in the USAFX folders.

The following items were provided in discovery:

| <u>Production Date</u> | <u>Contents</u> | <u>Description & Items</u> |
|------------------------|------------------------------------|--|
| 9/24/21 | 1 ZIP file, 1 pdf file, 1 xls file | Reports of Alleged Wrongdoing by USCP Officers |
| 9/29/21 | 1 pdf & 3 attachments | Opening Communication [SENSITIVE] 266T-BA-3399301_0000001.pdf <u>Attachments</u> [SENSITIVE] 266T-BA-3399301_0000001_1A0000001_0000001.csv [SENSITIVE] 266T-BA-3399301_0000001_1A0000001_0000002.pdf 266T-BA-3399301_0000001_1A0000002_0000001.jpg |
| 9/29/21 | 1 pdf & 6 attachments | Work Up [SENSITIVE] 266T-BA-3399301_0000002.pdf <u>Attachments</u> 266T-BA-3399301_0000002_1A0005063_0000001.pdf 266T-BA-3399301_0000002_1A0005063_0000002.pdf 266T-BA-3399301_0000002_1A0005063_0000003.docx 266T-BA-3399301_0000002_1A0005063_0000004.pdf 266T-BA-3399301_0000002_1A0005063_0000005.pdf 266T-BA-3399301_0000002_1A0005063_0000006.pdf |
| 9/29/21 | 1 pdf & 1 attachment | Open Source Research 266T-BA-3399301_0000003.pdf <u>Attachment</u> 266T-BA-3399301_0000003_1A0000003_0000001.xlsx |
| 9/29/21 | 1 pdf | Additional Checks 266T-BA-3399301_0000005.pdf |
| 9/29/21 | 1 pdf & 2 attachments | Review of Capitol Surveillance CCTV Video [SENSITIVE] 266T-BA-3399301_0000006.pdf <u>Attachments</u> [SENSITIVE] 266T-BA-3399301_0000006_1A0000004_0000001.pdf [SENSITIVE] 266T-BA-3399301_0000006_1A0000005_0000001.pdf |
| 9/29/21 | 1 pdf | Preservation Request to Facebook 266T-BA-3399301_0000007.pdf |

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| 9/29/21 | 1 pdf & 1 folder containing four JPG files and 1 MP4 file | <p>Open Source Facebook Captures 266T-BA-3399301_0000008.pdf</p> <p><u>Attachments</u> Contained in folder: 266T-BA-3399301_0000008_1A0000006_0000001</p> |
| 9/29/21 | 1 pdf | <p>Christopher Price's Facebook User ID 266T-BA-3399301_0000009.pdf</p> |
| 9/29/21 | 1 pdf & 2 attachments | <p>Preservation Request to Google, Inc. 266T-BA-3399301_0000012.pdf</p> <p><u>Attachments</u> 266T-BA-3399301_0000012_1A0000007_0000001.pdf 266T-BA-3399301_0000012_Import.msg</p> |
| 9/29/21 | 1 pdf & 2 attachments | <p>Opening Full Investigation [SENSITIVE] 266T-BA-3399301_0000013.pdf</p> <p><u>Attachments</u> 266T-BA-3399301_0000013_1A0000001_0000001.jpg 266T-BA-3399301_0000013_1A0000002_0000001.pdf</p> |
| 9/29/21 | 1 pdf & 2 attachments | <p>Prosecution Package [SENSITIVE] 266T-BA-3399301_0000014.pdf</p> <p><u>Attachments</u> [SENSITIVE] 266T-BA-3399301_0000014_1A0000008_0000001.docx [SENSITIVE] 266T-BA-3399301_0000014_1A0000009_0000001.docx</p> |
| 9/29/21 | 1 pdf & 5 attachments | <p>License Plate Reader Results [SENSITIVE] 266T-BA-3399301_0000015.pdf</p> <p><u>Attachments</u> 266T-BA-3399301_0000015_1A0000010_0000001.jpg 266T-BA-3399301_0000015_1A0000010_0000002.jpg 266T-BA-3399301_0000015_1A0000010_0000003.jpg [SENSITIVE] 266T-BA-3399301_0000015_1A0000010_0000004.msg 266T-BA-3399301_0000015_1A0000010_0000005.jpg</p> |
| 9/29/21 | 1 pdf | <p>Review of Records for ***-***-4832 [SENSITIVE] 266T-BA-3399301_0000016.pdf</p> |

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| 9/29/21 | 1 pdf & 2 attachments | <p>Motor Vehicle Records 266T-BA-3399301_0000017.pdf</p> <p><u>Attachments</u> 266T-BA-3399301_0000017_1A0000011_0000001.pdf 266T-BA-3399301_0000017_1A0000011_0000002.pdf</p> |
| 9/29/21 | 1 pdf | <p>License Plate Reader Results [SENSITIVE] 266T-BA-3399301_0000018.pdf</p> |
| 9/29/21 | 1 pdf | <p>USCP Original Video Evidence Request [SENSITIVE] 266T-BA-3399301_0000019.pdf</p> |
| 9/29/21 | 1 pdf & 4 attachments (2 pdf files and 2 zip folders containing photos) | <p>Interview of Witness [SENSITIVE] 266T-BA-3399301_0000020.pdf</p> <p><u>Attachments</u> [SENSITIVE] 266T-BA-3399301_0000020_1A0000014_0000001.pdf [SENSITIVE] 266T-BA-3399301_0000020_1A0000015_0000001.pdf 266T-BA-3399301_0000020_1A0000016_0000001.zip 266T-BA-3399301_0000020_1A0000016_0000002.zip</p> |
| 9/29/21 | 1 pdf | <p>Additional USCP Original Video Evidence Request [SENSITIVE] 266T-BA-3399301_0000021.pdf</p> |
| 9/29/21 | 1 pdf & 1 attachment | <p>Additional Capitol Media Review [SENSITIVE] 266T-BA-3399301_0000022.pdf</p> <p><u>Attachment</u> [SENSITIVE] 266T-BA-3399301_0000022_1A0000018_0000001.pdf</p> |
| 9/29/21 | 1 pdf & 1 attachment | <p>Cynthia Ballenger Interview [SENSITIVE] 266T-BA-3399301_0000023.pdf</p> <p><u>Attachment</u> 266T-BA-3399301_0000023_1A0000019_0000001.pdf</p> |
| 9/29/21 | 1 pdf & 1 attachment | <p>Christopher Price Interview [SENSITIVE] 266T-BA-3399301_0000024.pdf</p> <p><u>Attachment</u> 266T-BA-3399301_0000024_1A0000009_0000001.pdf</p> |
| 9/29/21 | 1 pdf & 2 attachments | <p>Receipt of Original Capitol Media 266T-BA-3399301_0000025.pdf</p> <p><u>Attachments</u> 266T-BA-3399301_0000025_1A0000010_0000001_PHYSICAL.pdf 266T-BA-3399301_0000025_1A0000010_0000002_PHYSICAL.pdf</p> |

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| 9/29/21 | 1 pdf & 2 attachments | <p>Receipt of Additional Original Capitol Media 266T-BA-3399301_0000026.pdf</p> <p><u>Attachments</u> 266T-BA-3399301_0000026_1A0000011_0000001_PHYSICAL.pdf 266T-BA-3399301_0000026_1A0000011_0000002_PHYSICAL.pdf</p> |
| 9/29/21 | 1 pdf & 1 folder containing 6 pdf files | <p>Signed Criminal Complaint/Warrant/Statement of Facts 266T-BA-3399301_0000027.pdf</p> <p><u>Attachments</u> Contained in folder: 266T-BA-3399301_0000027_1A0000020_0000001</p> |
| 9/29/21 | 1 pdf & 1 attachment | <p>Ballenger Search Warrant 266T-BA-3399301_0000029.pdf</p> <p><u>Attachment</u> 266T-BA-3399301_0000029_1A0000022_0000001.pdf</p> |
| 9/29/21 | 1 pdf & 1 attachment | <p>Ballenger Phone Extraction 266T-BA-3399301_0000030.pdf</p> <p><u>Attachment</u> 266T-BA-3399301_0000030_1A0000023_0000001.pdf</p> |
| 9/29/21 | 1 pdf & 2 attachments | <p>Arrest of Christopher Price 266T-BA-3399301_0000031.pdf</p> <p><u>Attachments</u> 266T-BA-3399301_0000031_1A0000014_0000001.pdf 266T-BA-3399301_0000031_1A0000015_0000001.pdf</p> |
| 9/29/21 | 1 pdf & 2 attachments | <p>Arrest of Cynthia Ballenger 266T-BA-3399301_0000032.pdf</p> <p><u>Attachments</u> 266T-BA-3399301_0000032_1A0000024_0000001.pdf 266T-BA-3399301_0000032_1A0000025_0000001.pdf</p> |
| 9/29/21 | 1 pdf & 3 attachments | <p>Ballenger and Price Cell Phone Photographs 266T-BA-3399301_0000033.pdf</p> <p><u>Attachments</u> 266T-BA-3399301_0000033_1A0000026_0000001.msg 266T-BA-3399301_0000033_1A0000026_0000002.msg 266T-BA-3399301_0000033_Import.msg</p> |

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| 9/29/21 | 1 pdf & 9 attachments | <p>Surveillance [SENSITIVE] 266T-BA-3399301-FISUR_0000001.pdf</p> <p><u>Attachments</u> [SENSITIVE] 266T-BA-3399301-FISUR_0000001_1A0000001_0000001.pdf 266T-BA-3399301-FISUR_0000001_1A0000001_0000002.jpg 266T-BA-3399301-FISUR_0000001_1A0000001_0000003.jpg 266T-BA-3399301-FISUR_0000001_1A0000001_0000004.jpg 266T-BA-3399301-FISUR_0000001_1A0000001_0000005.jpg 266T-BA-3399301-FISUR_0000001_1A0000001_0000006.jpg 266T-BA-3399301-FISUR_0000001_1A0000001_0000007.jpg 266T-BA-3399301-FISUR_0000001_1A0000001_0000008.jpg 266T-BA-3399301-FISUR_0000001_1A0000002_0000001.png</p> |
| 9/29/21 | 1 pdf & 1 attachment | <p>Surveillance [SENSITIVE] 266T-BA-3399301-FISUR_0000002.pdf</p> <p><u>Attachment</u> 266T-BA-3399301-FISUR_0000002_1A0000003_0000003.jpg</p> |
| 9/29/21 | 1 pdf & 1 attachment | <p>Grand Jury Subpoena - AT&T 266T-BA-3399301-GJ_0000001.pdf</p> <p><u>Attachment</u> 266T-BA-3399301-GJ_0000001_1A0000001_0000001.pdf</p> |
| 9/29/21 | 1 pdf & 2 attachments | <p>Grand Jury Subpoena – Facebook 266T-BA-3399301-GJ_0000002.pdf</p> <p><u>Attachments</u> 266T-BA-3399301-GJ_0000002_1A0000002_0000001.pdf 266T-BA-3399301-GJ_0000002_1A0000002_0000002.pdf</p> |
| 9/29/21 | 1 pdf & 2 attachments | <p>Grand Jury Subpoena – Google 266T-BA-3399301-GJ_0000003.pdf</p> <p><u>Attachments</u> 266T-BA-3399301-GJ_0000003_1A0000003_0000001.pdf 266T-BA-3399301-GJ_0000003_1A0000003_0000002.pdf</p> |
| 9/29/21 | 1 pdf & 1 folder containing 2 pdf files and 1 ZIP file | <p>Production – Facebook 266T-BA-3399301-GJ_0000004.pdf</p> <p><u>Attachments</u> Contained in folder: 266T-BA-3399301-GJ_0000004_1A0000004_0000002</p> |

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| 9/29/21 | 1 pdf & 1 folder containing 1 TIF file and 1 ZIP file | Production - AT&T 266T-BA-3399301-GJ_0000005.pdf <u>Attachments</u> Contained in folder: 266T-BA-3399301-GJ_0000005_1A000005_0000002 |
| 9/29/21 | 1 pdf & 6 attachments | Grand Jury Subpoenas - Equifax, Experian, and TransUnion 266T-BA-3399301-GJ_0000007.pdf <u>Attachments</u> 266T-BA-3399301-GJ_0000007_1A000007_0000001.pdf 266T-BA-3399301-GJ_0000007_1A000007_0000002.pdf 266T-BA-3399301-GJ_0000007_1A000007_0000003.pdf 266T-BA-3399301-GJ_0000007_1A000007_0000004.pdf 266T-BA-3399301-GJ_0000007_1A000007_0000005.pdf 266T-BA-3399301-GJ_0000007_1A000007_0000006.pdf |
| 9/29/21 | 1 pdf & 3 attachments | Production – Equifax 266T-BA-3399301-GJ_0000008.pdf <u>Attachments</u> 266T-BA-3399301-GJ_0000008_1A000008_0000001.pdf 266T-BA-3399301-GJ_0000008_1A000008_0000002.pdf 266T-BA-3399301-GJ_0000008_1A000008_0000003.pdf |
| 9/29/21 | 1 pdf & 4 attachments | Grand Jury Subpoenas - PNC and Bank of America 266T-BA-3399301-GJ_0000009.pdf <u>Attachments</u> 266T-BA-3399301-GJ_0000009_1A000009_0000001.pdf 266T-BA-3399301-GJ_0000009_1A000009_0000002.pdf 266T-BA-3399301-GJ_0000009_1A000009_0000003.pdf 266T-BA-3399301-GJ_0000009_1A000009_0000004.pdf |
| 9/29/21 | 1 pdf & 3 attachments | Review of AT&T, Facebook, and Google Subpoena Returns [SENSITIVE] 266T-BA-3399301-GJ_0000010.pdf <u>Attachments</u> 266T-BA-3399301-GJ_0000010_1A000010_0000001.pdf 266T-BA-3399301-GJ_0000010_1A000011_0000001.pdf 266T-BA-3399301-GJ_0000010_1A000011_0000002.pdf |

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| 9/29/21 | 1 pdf & 3 attachments | <p>Experian Subpoena Returns 266T-BA-3399301-GJ_0000011.pdf</p> <p><u>Attachments</u> 266T-BA-3399301-GJ_0000011_1A0000013_0000001.pdf 266T-BA-3399301-GJ_0000011_1A0000013_0000002.pdf 266T-BA-3399301-GJ_0000011_1A0000013_0000003.pdf</p> |
| 9/29/21 | 1 pdf & 1 attachment | <p>Bank of America Subpoena Returns 266T-BA-3399301-GJ_0000012.pdf</p> <p><u>Attachment</u> 266T-BA-3399301-GJ_0000012_1A0000014_0000001.pdf</p> |
| 9/29/21 | 1 pdf & 1 attachment | <p>TransUnion Grand Jury Subpoena Return 266T-BA-3399301-GJ_0000013.pdf</p> <p><u>Attachment</u> 266T-BA-3399301-GJ_0000013_1A0000015_0000001.pdf</p> |
| 9/29/21 | 1 pdf & 2 attachments (1 pdf & 1 folder containing 2 ZIP files) | <p>Production – Google 266T-BA-3399301-GJ_0000014.pdf</p> <p><u>Attachments</u> 266T-BA-3399301-GJ_0000014_1A0000016_0000001.pdf Folder: 266T-BA-3399301-GJ_0000014_1A0000016_0000003</p> |
| 9/29/21 | 1 pdf & 1 attachment | <p>PNC Subpoena Returns 266T-BA-3399301-GJ_0000015.pdf</p> <p><u>Attachment</u> 266T-BA-3399301-GJ_0000015_1A0000017_0000001.pdf</p> |
| 9/29/21 | 1 pdf & 3 attachments | <p>Christopher Price Record Checks [SENSITIVE] 266T-BA-3418388_0000002.pdf</p> <p><u>Attachments</u> 266T-BA-3418388_0000002_1A0000003_0000001.pdf 266T-BA-3418388_0000002_1A0000003_0000002.pdf 266T-BA-3418388_0000002_1A0000003_0000003.pdf</p> |
| 9/29/21 | 1 pdf & 1 attachment | <p>Google Preservation Request 266T-BA-3418388_0000010.pdf</p> <p><u>Attachment</u> 266T-BA-3418388_0000010_1A0000004_0000001.pdf</p> |

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| 9/29/21 | 1 pdf & 2 attachment | <p>Christopher Price Location Information [SENSITIVE] 266T-BA-3418388_0000011.pdf</p> <p><u>Attachments</u> [SENSITIVE] 266T-BA-3418388_0000011_1A0000005_0000001.csv [SENSITIVE] 266T-BA-3418388_0000011_1A0000005_0000002.pdf</p> |
| 9/29/21 | 1 pdf & 2 attachment | <p>Christopher Price Prosecution Package [SENSITIVE] 266T-BA-3418388_0000012.pdf</p> <p><u>Attachments</u> [SENSITIVE] 266T-BA-3418388_0000012_1A0000006_0000001.docx [SENSITIVE] 266T-BA-3418388_0000012_1A0000007_0000001.docx</p> |
| 9/29/21 | 1 pdf | <p>Christopher Price Email Information 266T-BA-3418388_0000013.pdf</p> |
| 9/29/21 | 1 pdf | <p>Review of Phone Records for ***-***-0043 [SENSITIVE] 266T-BA-3418388_0000015.pdf</p> |
| 9/29/21 | 1 pdf & 1 attachment | <p>Open Source Research Associated with Christopher Price 266T-BA-3418388_0000017.pdf</p> <p><u>Attachment</u> 266T-BA-3418388_0000017_1A0000008_0000001.xlsx</p> |
| 9/29/21 | 1 pdf & 1 attachment | <p>Christopher Price Search Warrant 266T-BA-3418388_0000029.pdf</p> <p><u>Attachment</u> 266T-BA-3418388_0000029_1A0000012_0000001.pdf</p> |
| 9/29/21 | 1 pdf & 1 attachment | <p>Christopher Price Cell Phone Extraction 266T-BA-3418388_0000030.pdf</p> <p><u>Attachment</u> 266T-BA-3418388_0000030_1A0000013_0000001.pdf</p> |
| 9/29/21 | 1 pdf | <p>Collection Sample 266T-BA-3418388_0000035.pdf</p> |
| 9/29/21 | 1 pdf & 1 attachment | <p>Grand Jury Subpoena - AT&T 266T-BA-3418388-GJ_0000001.pdf</p> <p><u>Attachment</u> 266T-BA-3418388-GJ_0000001_1A0000001_0000001.pdf</p> |

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| 9/29/21 | 1 pdf & 2 attachments | Grand Jury Subpoena - Google 266T-BA-3418388-GJ_0000002.pdf <u>Attachments</u> 266T-BA-3418388-GJ_0000002_1A0000002_0000001.pdf 266T-BA-3418388-GJ_0000002_1A0000002_0000002.pdf |
| 9/29/21 | 1 pdf & 2 attachments | Grand Jury Subpoena - Facebook 266T-BA-3418388-GJ_0000003.pdf <u>Attachments</u> 266T-BA-3418388-GJ_0000003_1A0000003_0000001.pdf 266T-BA-3418388-GJ_0000003_1A0000003_0000002.pdf |
| 9/29/21 | 1 pdf & 1 folder containing 1 pdf file and 1 ZIP file | Production – Google 266T-BA-3418388-GJ_0000004.pdf <u>Attachments</u> Contained in folder: 266T-BA-3418388-GJ_0000004_1A0000004_0000001 |
| 9/29/21 | 1 pdf & 1 folder containing 2 pdf files and 1 ZIP file | Production – Facebook 266T-BA-3418388-GJ_0000005.pdf <u>Attachments</u> Contained in folder: 266T-BA-3418388-GJ_0000005_1A0000005_0000001 |
| 9/29/21 | 1 pdf & 1 folder containing 1 TIF file and 1 ZIP file | Production – AT&T 266T-BA-3418388-GJ_0000006.pdf <u>Attachments</u> Contained in folder: 266T-BA-3418388-GJ_0000006_1A0000006_0000002 |
| 9/29/21 | 1 pdf & 1 folder containing 3 pdf files and 1 pdf | Production – Bank of America 266T-BA-3418388-GJ_0000014.pdf <u>Attachments</u> Contained in folder (3 pdf files): 266T-BA-3418388-GJ_0000014_1A0000007_0000001 266T-BA-3418388-GJ_0000014_1A0000007_0000002.pdf |

Respectfully,

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY

By: /s/ Jacob R. Steiner
Jacob R. Steiner
Trial Attorney, Detailee



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*

September 27, 2021

BY EMAIL

Steven H. Levin
Rosenberg Martin Greenberg, LLP
25 South Charles Street, 21st Floor
Baltimore, Maryland 21201
slevin@rosenbergmartin.com

Re: United States v. Cynthia Ballenger & Christopher Price, Case No. 21-mj-550

Dear Mr. Levin:

As part of our ongoing discovery production in this case, we produced the following information on September 24, 2021:

1. 4,044 files (over one terabyte) consisting of U.S. Capitol Police (“USCP”) Closed Circuit Video (“CCV”) footage from 118 cameras has been shared to the defense instance of evidence.com. The contents of footage being shared includes video from the interior of the U.S. Capitol Visitor Center and from the Capitol grounds. These files are designated Sensitive under the protective order. Additional footage will be provided on a rolling basis, as we ingest it into our own instance of evidence.com.
2. Twenty files that are exhibits to previously produced USCP OPR reports, and a corresponding index, have been shared via USAfx and you should have received a notification via email. Any applicable sensitivity designations are reflected in the index. Additional exhibits will be provided on a rolling basis as we continue to ingest and quality-check them.
3. Forty-two files that consist of MPD internal investigation reports and exhibits, and a corresponding index, have been shared via a second, separate USAfx production, and you should have received a notification via email. These reports

and exhibits are unredacted and thus designated Highly Sensitive under the protective order.

The Federal Public Defender for the District of Columbia (“FPD”) has agreed to serve as the Discovery Liaison for defense counsel in Capitol Breach cases. FPD is currently reviewing the various features of evidence.com and testing out the capabilities of the program with sample data. Within the next two weeks, FPD will be sending out information to defense counsel that includes a point-of-contact for discovery-related inquiries, the procedures to follow for obtaining a license to access evidence.com, and a quick start guide for defense counsel to use with evidence.com.

It has come to our attention that there are sensitivities that must be addressed prior to large scale disclosure of body-worn-camera footage. We are working diligently to resolve these issues and in the interim we have produced a sample of fifty body-worn-camera files to FPD’s instance of evidence.com. This sample will allow our technological teams to discuss the necessary infrastructure and workflows that need to be implemented. Ultimately, we intend to produce the majority of body-worn-camera footage with the least restrictive applicable sensitivity designations, if any, in order to facilitate defendant review.

In the near future, we expect to provide tools that will assist your review of the voluminous video footage described above, to include:

1. Camera maps for USCP CCV;
2. Our work product, consisting of a spreadsheet and related zone maps, identifying body-worn-camera footage by agency, officer, video start time, a summary of events, and location of the camera in 15-minute increments; and
3. Global Positioning Satellite information for Metropolitan Police Department radios, which may be of some assistance in identifying officers whose body-worn-cameras were recording at a particular time and location.

I will forward additional discovery as it becomes available. If you have any questions or if you fail to receive two separate USAfx invitations in connection with this production, please feel free to contact me.

Sincerely,

By: /s/ Jacob R. Steiner
Jacob R. Steiner
Trial Attorney, Detailee



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

September 3, 2021

BY EMAIL

Steven H. Levin
Rosenberg Martin Greenberg, LLP
25 South Charles Street, 21st Floor
Baltimore, Maryland 21201
slevin@rosenbergmartin.com

Re: United States v. Cynthia Ballenger & Christopher Price, Case No. 21-mj-550

Dear Mr. Levin:

Attached please find initial discovery in this matter, which is being provided through a shared folder on USA File Exchange (USAFX) titled "US v. Price & Ballenger (Discovery)."

These items are being provided pursuant to the agreed upon protective order, and pursuant to that order certain items may be designated as "SENSITIVE" or "HIGHLY SENSITIVE" in the list below and in the USAFX folders.

The following items were provided in discovery on September 3, 2021:

| <u>Production Date</u> | <u>Contents</u> | <u>Description & Documents</u> |
|------------------------|-----------------|---|
| 9/3/2021 | 6 videos | U.S. Capitol Surveillance Videos [HIGHLY SENSITIVE] 0102 USCS 01 Senate Wing Door near S139-2021-01-06_15h22min00s000ms.asf [HIGHLY SENSITIVE] 0102 USCS 01 Senate Wing Door near S139-2021-01-06_15h22min00s000ms_1.asf [HIGHLY SENSITIVE] 0930 USCG 00 Upper Terrace NE-2021-01-06_16h03min00s000ms.asf |

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|----------|-----------------------|---|
| | | <p>[HIGHLY SENSITIVE] 0930 USCG 00 Upper Terrace NE-2021-01-06_15h51min00s000ms.asf</p> <p>[HIGHLY SENSITIVE] 0102 USCS 01 Senate Wing Door near S139-2021-01-06_14h25min00s000ms.asf</p> <p>[HIGHLY SENSITIVE] 0930 USCG 00 Upper Terrace NE-2021-01-06_15h52min00s000ms.asf</p> |
| 9/3/2021 | 1 pdf & 5 attachments | <p>Cellular Telephone Search Warrants 266T-BA-3399301_0000028.pdf</p> <p><u>Attachments</u> 21-2226 flattened Ballinger - AO 93C - Search Warrant by Telephone Form.pdf 21-2226 flattened Ballinger - AO 106A - SW Application by phone.pdf 21-2226 to -2227 Affidavit and Att A & B.pdf 21-2227 flattened Price - AO 93C - Search Warrant by Telephone Form.pdf 21-2227 flattened Price - AO 106A - SW Application by phone.pdf</p> |

Respectfully,

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