

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

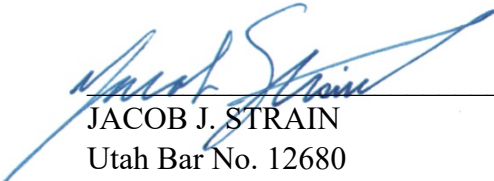
<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>CRIMINAL NO. 1:21-MJ-543</b>
	:	
<b>KELSEY LEIGH ANN WILSON,</b>	:	
	:	
<b>Defendant.</b>	:	

**NOTICE OF FILING**

The Government requests that the attached discovery letter, dated August 30, 2021, be made part of the record in the above-captioned case.

Respectfully submitted,

CHANNING D. PHILLIPS  
ACTING UNITED STATES ATTORNEY




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JACOB J. STRAIN  
Utah Bar No. 12680  
Assistant United States Attorney  
U.S. Attorney's Office for the District of Columbia  
555 4th Street, N.W.  
Washington, D.C. 20530



**U.S. Department of Justice**

**CHANNING D. PHILLIPS**  
Acting United States Attorney  
District of Utah

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

August 30, 2021

Kira Anne West  
kiraannewest@gmail.com

RE: U.S. v. Kelsey Leigh Ann Wilson (1:21-MJ-543)

Dear Counsel,

Pursuant to our discovery obligations, we have provided the following files via USAfx on August 30, 2021. Note that many of these files and their related physical attachments are currently being formally processed for discovery by the discovery team assigned to the Capitol Riots cases. As such, some of the same files will be re-produced with bates-stamps at a later date. The following files have all been designated as "Sensitive" pursuant to the terms of the Protective Order:

Wilson, Kelsey (Folder)

1. 0176-KC-3440956\_0000001.pdf
2. 0176-KC-3440956\_0000002.pdf
3. 0176-KC-3440956\_0000003.pdf
4. 0176-KC-3440956\_0000003\_Import.pdf
5. 0176-KC-3440956\_0000004\_Redacted.pdf
6. 0176-KC-3440956\_0000005\_Redacted.pdf
7. 0176-KC-3440956\_0000006\_1A0003825\_0000001\_Redacted.pdf
8. 0176-KC-3440956\_0000006\_Redacted.pdf
9. 0176-KC-3440956\_0000007.pdf
10. 0176-KC-3440956\_0000008.pdf
11. 0176-KC-3440956\_0000009\_1A0003446\_0000001\_Redacted.pdf
12. 0176-KC-3440956\_0000009\_Redacted.pdf
13. 0176-KC-3440956\_0000010.pdf
14. 0176-KC-3440956\_0000010\_1A0000001\_0000002.3gp
15. 0176-KC-3440956\_0000010\_1A0000001\_0000003.jpg
16. 0176-KC-3440956\_0000010\_1A0000001\_0000004.pdf

17. 0176-KC-3440956\_0000010\_1A0000001\_0000005.jpg
18. 0176-KC-3440956\_0000011\_1A0000002\_0000001.jpg
19. 0176-KC-3440956\_0000011\_1A0000002\_0000002\_PHYSICAL.pdf
20. 0176-KC-3440956\_0000011\_1A0000002\_0000003\_Redacted.pdf
21. 0176-KC-3440956\_0000011\_Redacted.pdf
22. 0176-KC-3440956\_0000012.pdf
23. 0176-KC-3440956\_0000012\_1A0000001\_0000001\_PHYSICAL.pdf
24. 0176-KC-3440956\_0000012\_1A0000001\_0000002\_PHYSICAL.pdf
25. 0176-KC-3440956\_0000014.pdf
26. 0176-KC-3440956\_0000014\_1A0000002\_0000001\_Redacted.pdf
27. 0176-KC-3440956\_0000015.pdf
28. 0176-KC-3440956\_0000015\_1A0000003\_0000001.docx
29. 0176-KC-3440956\_0000015\_1A0000003\_0000002.docx
30. 0176-KC-3440956\_0000016.pdf
31. 0176-KC-3440956\_0000017.pdf
32. 0176-KC-3440956\_0000017\_1A0000003\_0000001\_PHYSICAL.pdf
33. 0176-KC-3440956\_0000017\_1A0000003\_0000002\_PHYSICAL.pdf
34. 0176-KC-3440956\_0000018.pdf
35. 0176-KC-3440956\_0000018\_1A0000004\_0000001\_PHYSICAL.pdf
36. 0176-KC-3440956\_0000018\_1A0000004\_0000002\_PHYSICAL.pdf
37. 0176-KC-3440956\_0000019.pdf
38. 0176-KC-3440956\_0000019\_1A0000005\_0000001\_PHYSICAL.pdf
39. 0176-KC-3440956\_0000019\_1A0000005\_0000002\_PHYSICAL.pdf
40. 0176-KC-3440956\_0000020.pdf
41. 0176-KC-3440956\_0000020\_1A0000001\_0000001.pdf
42. 0176-KC-3440956\_0000020\_1A0000001\_0000002.pdf
43. 0176-KC-3440956\_0000020\_1A0000001\_0000003.pdf
44. 0176-KC-3440956\_0000020\_1A0000001\_0000004.pdf
45. 0176-KC-3440956\_0000020\_1A0000001\_0000005.pdf
46. 0176-KC-3440956\_0000021.pdf
47. 0176-KC-3440956\_0000021\_1A0000002\_0000001.html
48. 0176-KC-3440956\_0000022.pdf
49. 0176-KC-3440956\_0000022\_1A0000003\_0000001.png

Wilson, Zach/Round 01 (Folder)

50. Zach Wilson Body Cam Footage.jpg

Arrest 2021.02.19 (folder)

51. 0176-KC-3375962\_0000022.pdf
52. 0176-KC-3375962\_0000022\_1A0000006\_0000001.pdf

BWC (folder)

53. Zachary\_Wilson.mp4
54. Zachary\_Wilson-2.mp4
55. Zachary\_Wilson-3.mp4
56. Zachary\_Wilson-4.mp4

57. Wilsons.jpg

Crim History Report 2021.01.21 (folder)

58. 0176-KC-3375962\_0000010.pdf

59. 0176-KC-3375962\_0000010\_Import.pdf

Facebook Preservation 2021.01.22 (folder)

60. 0176-KC-3375962\_0000011.pdf

61. 0176-KC-3375962\_0000011\_Import.msg

Harman, Julie 2021.01.18 (folder)

62. 0176-KC-3375962\_0000005\_1A0003825\_0000001.msg

63. 0176-KC-3375962\_0000005\_Redacted.pdf

Lupe, Traci 2021.01.21 (folder)

64. 0176-KC-3375962\_0000013\_1A0000002\_0000001.jpg

65. 0176-KC-3375962\_0000013\_1A0000002\_0000002\_PHYSICAL.pdf

66. 0176-KC-3375962\_0000013\_1A0000002\_0000003.pdf

67. 0176-KC-3375962\_0000013\_Redacted.pdf

Receipt of Evidence 2021.01.29 (folder)

68. 0176-KC-3375962\_0000015.pdf

69. 0176-KC-3375962\_0000015\_1A0000001\_0000001\_PHYSICAL.pdf

70. 0176-KC-3375962\_0000015\_1A0000001\_0000002\_PHYSICAL.pdf

Receipt of Evidence 2021.02.02 (folder)

71. 0176-KC-3375962\_0000017.pdf

72. 0176-KC-3375962\_0000017\_1A0000002\_0000001.pdf

Receipt of Evidence 2021.02.12 (folder)

73. 0176-KC-3375962\_0000019.pdf

74. 0176-KC-3375962\_0000019\_1A0000004\_0000001.pdf

75. 0176-KC-3375962\_0000019\_1A0000004\_0000002.pdf

76. 0176-KC-3375962\_0000019\_1A0000004\_0000003.pdf

77. 0176-KC-3375962\_0000019\_1A0000004\_0000004.pdf

78. 0176-KC-3375962\_0000019\_1A0000004\_0000005.pdf

Receipt of Evidence 2021.03.01 (folder)

79. 0176-KC-3375962\_0000023.pdf

80. 0176-KC-3375962\_0000023\_1A0000003\_0000001\_PHYSICAL.pdf

81. 0176-KC-3375962\_0000023\_1A0000003\_0000002\_PHYSICAL.pdf

Sandoval, Mark 2021.01.20 (folder)

82. 0176-KC-3375962\_0000008\_1A0003446\_0000001.jpeg

83. 0176-KC-3375962\_0000008\_Redacted.pdf

Surveillance 2021.02.12 (folder)

- 84. 0176-KC-3375962\_0000018.pdf
- 85. 0176-KC-3375962\_0000018\_1A0000003\_0000001.docx
- 86. 0176-KC-3375962\_0000018\_1A0000003\_0000002.docx

Surveillance 2021.02.18 (folder)

- 87. 0176-KC-3375962\_0000020.pdf

Wilson, Kelsey 2021.01.18 (folder)

- 88. 0176-KC-3375962\_0000006.pdf

Wilson, Zachary 2021.01.18 (folder)

- 89. 0176-KC-3375962\_0000007.pdf

Wilson, Zachary 2021.01.20 (folder)

- 90. 0176-KC-3375962\_0000009.pdf
- 91. 0176-KC-3375962\_0000009\_1A0000001\_0000001.jpeg
- 92. 0176-KC-3375962\_0000009\_1A0000001\_0000002.3gp
- 93. 0176-KC-3375962\_0000009\_1A0000001\_0000003.jpg
- 94. 0176-KC-3375962\_0000009\_1A0000001\_0000004.pdf
- 95. 0176-KC-3375962\_0000009\_1A0000001\_0000005.jpg

Wilson, Zachary 2021.01.21 (folder)

- 96. 0176-KC-3375962\_0000012.pdf

zScreenshots (folder)

- 97. Screenshot\_20210125-120703\_Messages.jpg
- 98. Screenshot\_20210125-120851\_Messages.jpg
- 99. Screenshot\_20210125-121149\_Messages.jpg
- 100. Screenshot\_20210125-121155\_Messages.jpg
- 101. Screenshot\_20210125-121200\_Messages.jpg
- 102. Screenshot\_20210125-121206\_Messages.jpg
- 103. Screenshot\_20210125-121210\_Messages.jpg
- 104. Screenshot\_20210125-121217\_Messages.jpg
- 105. Screenshot\_20210125-121223\_Messages.jpg
- 106. Screenshot\_20210125-121232\_Messages.jpg
- 107. Screenshot\_20210125-121240\_Messages.jpg
- 108. Screenshot\_20210125-121248\_Messages.jpg
- 109. Screenshot\_20210125-121255\_Messages.jpg
- 110. Screenshot\_20210125-121304\_Messages.jpg
- 111. Screenshot\_20210125-121308\_Messages.jpg
- 112. Screenshot\_20210125-121316\_Messages.jpg
- 113. Screenshot\_20210125-121322\_Messages.jpg
- 114. Screenshot\_20210125-121329\_Messages.jpg
- 115. Screenshot\_20210125-121337\_Messages.jpg
- 116. Screenshot\_20210125-121345\_Messages.jpg

- 117. Screenshot\_20210125-121352\_Messages.jpg
- 118. Screenshot\_20210125-121359\_Messages.jpg
- 119. Screenshot\_20210125-121407\_Messages.jpg
- 120. Screenshot\_20210125-121415\_Messages.jpg
- 121. Screenshot\_20210125-121425\_Messages.jpg

zVideos (folder)

- 122. IMG956237.3gp
- 123. IMG956240.3gp
- 124. IMG\_6238.3gp
- 125. IMG\_6239.3gp
- 126. IMG\_6243.3gp

Wilson, Zach/Round 02 (Folder)

- 127. 0176-KC-3375962\_0000001.pdf
- 128. 0176-KC-3375962\_0000002.pdf
- 129. 0176-KC-3375962\_0000002\_Import.pdf
- 130. 0176-KC-3375962\_0000003.pdf
- 131. 0176-KC-3375962\_0000004.pdf
- 132. 0176-KC-3375962\_0000014.pdf
- 133. 0176-KC-3375962\_0000014\_1A0000001\_0000001.mov
- 134. 0176-KC-3375962\_0000014\_1A0000001\_0000002.mov
- 135. 0176-KC-3375962\_0000014\_1A0000001\_0000003.msg
- 136. 0176-KC-3375962\_0000014\_1A0000001\_0000004.mov
- 137. 0176-KC-3375962\_0000014\_1A0000001\_0000005.jpg
- 138. 0176-KC-3375962\_0000014\_1A0000001\_0000006.mov
- 139. 0176-KC-3375962\_0000014\_1A0000001\_0000007.mov
- 140. 0176-KC-3375962\_0000014\_1A0000001\_0000008.mov
- 141. 0176-KC-3375962\_0000014\_1A0000001\_0000009.mov
- 142. 0176-KC-3375962\_0000014\_1A0000001\_0000010.mov
- 143. 0176-KC-3375962\_0000014\_1A0000001\_0000011.msg
- 144. 0176-KC-3375962\_0000014\_1A0000001\_0000012.pdf
- 145. 0176-KC-3375962\_0000014\_1A0000001\_0000013.mov
- 146. 0176-KC-3375962\_0000014\_1A0000001\_0000014.msg
- 147. 0176-KC-3375962\_0000014\_Import.pdf
- 148. 0176-KC-3375962\_0000024.pdf
- 149. 0176-KC-3375962\_0000024\_1A0000007\_0000001.jpg
- 150. 0176-KC-3375962\_0000025.pdf
- 151. 0176-KC-3375962\_0000026.pdf
- 152. 0176-KC-3375962\_0000026\_1A0000008\_0000001.msg
- 153. 0176-KC-3375962\_0000026\_Import.pdf
- 154. 0176-KC-3375962\_0000027.pdf
- 155. 0176-KC-3375962\_0000027\_1A0000004\_0000001\_PHYSICAL.pdf
- 156. 0176-KC-3375962\_0000027\_1A0000004\_0000002\_PHYSICAL.pdf
- 157. 0176-KC-3375962\_0000028.pdf
- 158. 0176-KC-3375962\_0000029.pdf

159. 0176-KC-3375962\_0000030.pdf
160. 0176-KC-3375962\_0000030\_1A0000009\_0000001\_PHYSICAL.pdf
161. 0176-KC-3375962\_0000031.pdf
162. 0176-KC-3375962\_0000031\_1A0000010\_0000001.pdf
163. 0176-KC-3375962\_0000032.pdf
164. 0176-KC-3375962\_0000032\_1A0000005\_0000001\_PHYSICAL.pdf
165. 0176-KC-3375962\_0000032\_1A0000005\_0000002\_PHYSICAL.pdf
166. 1384737235258130.pdf
167. activity\_log\_10218391354790979.mp4
168. activity\_log\_10218414143720688.jpg
169. activity\_log\_1621773214603141.mp4
170. activity\_log\_2074244656004006.mp4
171. activity\_log\_3356508414445607.mp4
172. activity\_log\_3717018448318809.mp4
173. group\_message\_10218496190971818.jpg
174. index.html
175. mylist.txt
176. photos\_10218387607737305.jpg
177. photos\_10218391139985609.jpg
178. photos\_10218391141825655.jpg
179. photos\_10218391227347793.jpg
180. photos\_10218391227427795.jpg
181. photos\_10218391227907807.jpg
182. photos\_10218391228187814.jpg
183. photos\_10218514334025383.jpg
184. photos\_10218514334465394.jpg
185. photos\_10218514335065409.jpg
186. photos\_10218514335385417.jpg
187. photos\_10218514335785427.jpg
188. photos\_10218514336105435.jpg
189. photos\_10218514336745451.jpg
190. photos\_1536153116438915.mp4
191. preservation-1.html
192. preservation-2.html
193. README.txt
194. shares\_10213209052436659.jpg
195. shares\_2074344469291114.jpg
196. status\_updates\_10218391139985609.jpg
197. status\_updates\_10218391141825655.jpg
198. status\_updates\_10218391227347793.jpg
199. status\_updates\_10218391227427795.jpg
200. status\_updates\_10218391227907807.jpg
201. status\_updates\_10218391228187814.jpg
202. status\_updates\_10218391354790979.mp4
203. status\_updates\_10218514334025383.jpg
204. status\_updates\_10218514334465394.jpg

- 205. status\_updates\_10218514335065409.jpg
- 206. status\_updates\_10218514335385417.jpg
- 207. status\_updates\_10218514335785427.jpg
- 208. status\_updates\_10218514336105435.jpg
- 209. status\_updates\_10218514336745451.jpg
- 210. status\_updates\_10219894231929530.jpg
- 211. status\_updates\_1475260322782164.png
- 212. status\_updates\_1621773214603141.mp4
- 213. status\_updates\_1979133918775706.mp4
- 214. status\_updates\_3077045809017929.png
- 215. status\_updates\_3083860458331294.mp4
- 216. status\_updates\_3356508414445607.mp4
- 217. status\_updates\_3514941501860076.mp4
- 218. status\_updates\_373937983783070.png
- 219. status\_updates\_4125821200782663.jpg
- 220. status\_updates\_5323938657632007.mp4
- 221. status\_updates\_718877478771157.mp4
- 222. unified\_message\_1118616788587277.mp4
- 223. unified\_message\_122922803038941.jpg
- 224. unified\_message\_1259423897784206.jpg
- 225. unified\_message\_1317038238639003.mp4
- 226. unified\_message\_204975191106797.mp4
- 227. unified\_message\_209894690867347.jpg
- 228. unified\_message\_2448592935437516.mp4
- 229. unified\_message\_2881304585460533.jpg
- 230. unified\_message\_2986437194791626.mp4
- 231. unified\_message\_369239263222822.png
- 232. unified\_message\_3748717005180167.jpg
- 233. unified\_message\_416374969377924.mp4
- 234. unified\_message\_547702746185905.gif
- 235. unified\_message\_996840944144188.xlsx
- 236. videos\_10218335994647010.mp4
- 237. videos\_10218391140265616.mp4
- 238. videos\_10218391302709677.mp4
- 239. videos\_10218391354790979.mp4
- 240. videos\_10218631640517972.mp4
- 241. videos\_10218642076978877.mp4
- 242. videos\_1475260322782164.png
- 243. videos\_1979133918775706.mp4
- 244. videos\_3077045809017929.png
- 245. videos\_3083860458331294.mp4
- 246. videos\_3514941501860076.mp4
- 247. videos\_718877478771157.mp4



The following files have all been designated as “Highly Sensitive” pursuant to the terms of the Protective Order:

Wilson, Zach/Round 01/CCTV (folder)

- 248. 0102 USCS 01 Senate Wing Door near S139-2021-01-06\_14h24min00s000ms.mp4
- 249. 0153 USCH 01 House Wing Door-2021-01-06\_14h42min00s000ms.mp4
- 250. 0171 USCH 01 Memorial Door-2021-01-06\_14h29min00s000ms.mp4
- 251. 0176 USCH 01 South Door-2021-01-06\_14h43min00s000ms.mp4
- 252. 0263 USCH 02 H227 Hallway (1\_6\_2021 2\_32\_49 PM EST).png
- 253. 0263 USCH 02 H227 Hallway (1\_6\_2021 2\_32\_53 PM EST).png
- 254. 0263 USCH 02 H227 Hallway-2021-01-06\_14h32min32s000ms.mp4
- 255. 0402 USCH 01 Crypt North-2021-01-06\_14h28min00s000ms.mp4
- 256. 0402 USCH 01 Crypt North-2021-01-06\_14h42min00s000ms.mp4
- 257. 0403 USCH 01 Crypt South-2021-01-06\_14h42min00s000ms.mp4
- 258. 0935 USCH 02 H230-2021-01-06\_14h34min15s000ms.mp4

Wilson, Zach/Round 02 (folder)

- 259. 0263 USCH 02 H227 Hallway (1\_6\_2021 2\_32\_49 PM EST).png
- 260. 0263 USCH 02 H227 Hallway (1\_6\_2021 2\_32\_53 PM EST).png
- 261. 0263 USCH 02 H227 Hallway-2021-01-06\_14h32min32s000ms.mp4
- 262. 0263 USCH 02 H227 Hallway-2021-01-06\_14h33min50s000ms.asf
- 263. 0931 USCH 02 H230-2021-01-06\_14h34min06s000ms.asf
- 264. 0935 USCH 02 H230-2021-01-06\_14h34min14s000ms.asf
- 265. 0935 USCH 02 H230-2021-01-06\_14h34min15s000ms.mp4
- 266. 0959 USC 02 Rotunda South-2021-01-06\_14h38min07s000ms.asf
- 267. 0960 USC 02 Rotunda North-2021-01-06\_14h38min07s000ms.asf

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.

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.

By: /s/ Jacob J. Strain  
JACOB J. STRAIN  
Assistant United States Attorney