

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 1:21-cr-00303-2 (ABJ)
	:	
DEBORAH LYNN LEE,	:	
	:	
Defendant.	:	

NOTICE OF FILING DISCOVERY CORRESPONDENCE

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby files its November 8, 2021 discovery letter in this case, which was served as an attachment via ECF on counsel for the defendant.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
DC Bar No. 481052

By: /s/ Michael J. Romano
MICHAEL J. ROMANO
Trial Attorney, Detailee
IL Bar No. 6293658
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Washington, D.C. 20530
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CERTIFICATE OF SERVICE

On this 8th day of November, 2021, a copy of the foregoing was served on counsel for the defendant via the court's Electronic Filing System

/s/ Michael J. Romano
Michael J. Romano
Trial Attorney / Detailee



U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia

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

November 8, 2021

John Pierce, Esq.
jpierce@piercebainbridge.com

Re: *United States v. Deborah Lynn Lee*
Case No. 1:21-cr-00303

Dear Counsel:

I am writing to memorialize production of discovery in this matter. Today, the government provided you with the following items by way of USAfx.

- Subpoena returns from AT&T, Facebook, and Frontier Communications (26 files total)
- Records from the FBI's Sentinel system, through serial number 28 (78 files total)
- Video from John Sullivan YouTube (8 files total)
- Facebook materials associated with your client (3,133 files total)
- Screenshots from co-defendant Rusyn's Facebook account (9 files total)
- U.S. Capitol Police surveillance video (10 files total)

This material is subject to the terms of the Protective Order to which the parties have agreed, and which your client has signed. Pursuant to this order, each of the videos from the United States Capitol Police are designated as Highly Sensitive.

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 already has made some of these materials available to you, and its efforts to facilitate access are ongoing. In the meantime, please let me

know if there are any categories of information that you believe are particularly relevant to your client.

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/ Michael J. Romano
Michael J. Romano
Trial Attorney / Detailee