

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>Case No. 1:21-CR-725 (RDM)</b>
	:	
<b>JARED SAMUEL KASTNER,</b>	:	
	:	
<b>Defendant.</b>	:	
	:	
	:	

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**ERRATA AND SUPPLEMENT TO  
DEFENDANT JARED SAMUEL KASTNER’S REPLY TO UNITED STATES’  
RESPONSE IN OPPOSITION TO DEFENDANT’S MOTION FOR DISCLOSURE  
OF WITNESS #REDGLASSESONRED [SIC]**

Defendant JARED SAMUEL KASTNER (“Kastner”), by and through undersigned counsel, hereby respectfully files this Errata to his Reply in support of his Motion For Disclosure Of Witness #RedOnRedGlasses and respectfully demands disclosure of the identity of a potential witness in this case, known by the temporary identifier given to him by amateur internet researchers as #RedonRedGlasses.

On Page 16, the Reply refers to the “Mutual Legal Assistance Treaties” entered into between the United States and many other countries. See: “Mutual Legal Assistance Treaties,” <https://www.justice.gov/criminal-oia/file/1498806/download>

The Government activated such treaties, such as with France, to obtain evidence including raw news recordings from a New York based free-lance videography company “Keep in News” for French national television news. The two hours of video filmed by French reporter Laura Giesweller, including an unbroken view of crowds entering the East central staircase door and moving throughout the Capitol, was produced by the USAO to defense attorneys with the

name: 210107 LAURA USA CAPITOL WASHINGTON.mp4. The USAO's only reason for withholding this video from the public, it contends, is that it was obtained through the United States' "Mutual Legal Assistance Treaty" with France. Many pages of official correspondence with French law enforcement was disclosed to defense counsel with the video. There is otherwise no basis for withholding the video from the public under the terms of the Protective Orders.

Therefore, the FBI's search of computer matches of #RedonRedGlasses using facial recognition software would with certainty include the databases of other countries who often cooperate with the United States. Particularly if the FBI came up empty on a search of U.S. databases, it is a known certainty that the FBI would request a search of photographic databases of other countries as well.

However, due to a word processing mistake, Page 16 incorrectly stated the name of such treaties.

August 7, 2023

**RESPECTFULLY SUBMITTED,**

John M. Pierce, Esq.  
*Counsel for Defendant*

/s/ John Pierce

JOHN PIERCE LAW  
21550 Oxnard Street 3rd Floor, PMB #172  
Woodland Hills, CA 91367  
jpierce@johnpiercelaw.com  
(213) 400-0725

**CERTIFICATE OF SERVICE**

I hereby certify that my law firm is filing the foregoing with the Court by its ECF record-keeping and filing system, which automatically provides a copy to:

MATTHEW M. GRAVES  
United States Attorney

Cytheria Jernigan  
U.S. Attorney's Office  
300 Fannin Street Suite 3201  
Shreveport, LA 71101  
318-676-3611  
318-676-3663 (fax)  
[cytheria.jernigan@usdoj.gov](mailto:cytheria.jernigan@usdoj.gov)

Will Widman  
DOJ-CRM  
1301 New York Avenue NW  
Washington, DC 20530  
(202) 353-8611  
[will.widman@usdoj.gov](mailto:will.widman@usdoj.gov)

Stephen F. Brennwald  
BRENNWALD & ROBERTSON, LLP  
922 Pennsylvania Avenue, SE  
Washington, DC 20003  
(301) 928-7727  
(202) 544-7626 (fax)  
sfbrennwald@cs.com  
Attorney for Kenneth Duncan Massie

Kira Anne West  
LAW OFFICE OF KIRA WEST  
712 H St, NE  
Unit 509  
Washington, DC 20002  
(202) 236-2042  
[kiraannewest@gmail.com](mailto:kiraannewest@gmail.com)  
Attorney for Luke Faulkner

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/s/  
John M. Pierce

