

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :  
 :  
 v. : **CASE NO. 22-CR-61-RBW**  
 :  
 :  
 JON NICHOLAS HENEGHAN, :  
 CAROL O'NEAL KICINSKI, :  
 Defendants. :

**NOTICE OF FILING**

For the purpose of illustrating the government's consistent and diligent efforts to produce voluminous discovery materials arising out of the breach of the United States Capitol on January 6, 2021 (the "Capitol Breach"), the government has filed status memoranda describing the efforts of the Capitol Breach Discovery Team on a regular basis since July 2021. We request that those memoranda, attached hereto and listed below, be made part of the record in this case:

1. Memorandum Regarding Status of Discovery as of July 12, 2021 (and Exhibit A);
2. Memorandum Regarding Status of Discovery as of August 23, 2021;
3. Memorandum Regarding Status of Discovery as of September 14, 2021;
4. Memorandum Regarding Status of Discovery as of October 21, 2021;
5. Memorandum Regarding Status of Discovery as of November 5, 2021;
6. Memorandum Regarding Status of Discovery as of February 9, 2022.

Respectfully submitted,  
MATTHEW M. GRAVES  
United States Attorney  
DC Bar No. 481052

By: /s/ Emily A. Miller  
EMILY A. MILLER  
Capitol Breach Discovery Coordinator  
DC Bar No. 462077  
555 Fourth Street, N.W., Room 5826  
Washington, DC 20530  
[Emily.Miller2@usdoj.gov](mailto:Emily.Miller2@usdoj.gov)  
(202) 252-6988

By: /s/ Mona Lee M. Furst  
MONA LEE M. FURST  
Assistant United States Attorney  
Detaillee – Federal Major Crimes  
Kansas Bar No. 13162  
United States Attorney's Office  
1200 Epic Center, Suite 1200  
Wichita, Kansas 67202  
Mobile No. (316) 269-6537  
[Mona.Furst@usdoj.gov](mailto:Mona.Furst@usdoj.gov)

