UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

: CASE NO. 1:22-cr-00166-BAH

:

JOHN GEORGE TODD III, :

v.

:

Defendant. :

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; and
- 5. Memorandum Regarding Status of Discovery as of November 5, 2021.

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

By: /s/ Emily A. Miller

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CERTIFICATE OF SERVICE

This is to certify that on this 24th day of May 2022, undersigned counsel served a copy of the foregoing Notice on counsel for the defendant in this action by CM/ECF:

Ronna Holloman-Hughes FEDERAL PUBLIC DEFENDERS 1000 Walnut Suite 600 Kansas City, MO 64106

> By: <u>/s/ Michael G. James</u> MICHAEL G. JAMES

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