

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

UNITED STATES OF AMERICA	:	
	:	1:21-CR-00190-DLF
v.	:	
	:	
ZACHARY JORDAN ALAM	:	
	:	
Defendant.	:	

NOTICE OF DISCOVERY

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby informs the Court and defense that the attached discovery letter of May 24, 2021, was provided to defense counsel in this matter.

Respectfully submitted,

CHANNING D. PHILLIPS
Acting United States Attorney
D.C. Bar No. 415793

By:



Candice C. Wong
Assistant United States Attorney
D.C. Bar No. 990903
555 4th Street, N.W., Room 4816
Washington, D.C. 20530
202-252-7849
Candice.wong@usdoj.gov



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

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

May 24, 2021

Via Email

Michael E. Lawlor
Nicholas G. Madiou
Brennan, McKenna & Lawlor, Chtd.
6305 Ivy Lane, Suite 700
Greenbelt, MD 20770
mlawlor@verizon.net
nickmadiou@gmail.com
Counsel for Zachary Jordan Alam

Re: *United States v. Zachary Jordan Alam*
Case No. 1:21-cr-00190-DLF

Dear Counsel:

Enclosed as additional discovery in this case, via filesharing, are the following materials:

1. HIGHLY SENSITIVE: U.S. Capitol Police surveillance footage (x8 files)
2. HIGHLY SENSITIVE: Superintendent of Capitol cost repair estimate for Speaker's Lobby doors
3. 302 with witness - serial 6 (redacted)
4. 302 with witness - serial 7 (redacted)
5. 302 regarding telephone communication with witness – serial 8 (redacted)
6. E-Tip from witness (redacted)
7. SENSITIVE: 302 with employer/acquaintance of defendant
8. SENSITIVE: 302 with employee at autoshop
9. SENSITIVE: 302 with second employee at autoshop
10. Apple subpoena returns
11. Facebook subpoena returns
12. Google subpoena return
13. Search warrant materials (6 documents and 68 photos)
14. Transcript of EDPA detention hearing
15. MPD license plate report redacted

The discovery is unencrypted. Please contact me if you have any issues accessing the information, and to confer regarding pretrial discovery as provided in Fed. R. Crim. P. 16.1.

These materials are subject to the Protective Order entered in this case. Please adhere to sensitivity markings.

I will forward additional discovery as it becomes available. 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.

If you have any questions, please feel free to contact me.

Sincerely,



Candice C. Wong
Assistant United States Attorney
202-252-7849
Candice.wong@usdoj.gov