



U.S. Department of Justice

Channing D. Phillips  
Acting United States Attorney

*District of Columbia*

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

March 10, 2021

Vila Email

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Re: *United States v. Christopher Grider*  
Case No. 1:21-cr-00022-KBJ

Dear Counsel:

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

1. Signed Complaint
2. Signed Redacted Complaint
3. Signed Affidavit Supporting Complaint
4. Signed Arrest Warrant, and Arrest Warrant Return
5. Indictment
6. 16 Screenshots of Defendant from Affidavit, Facebook Search Warrant, and Response to Motion for Revocation
7. NCIC Report
8. Law Enforcement Individual Report
9. Preservation letter
10. Debrief letter
11. 4 Open-Source Articles
12. Phone Search Warrant and Application
13. Vehicle Search Warrant and Application, and Return
14. Residence Search Warrant and Application, and Return
15. AT&T Subpoena Returns

16. Apple Subpoena Returns
17. Facebook Subpoena Returns
18. Facebook Search Warrant and Application, Return, and FBI Collected Item Log
19. Facebook Search Warrant Results (1 PDF, 90 linked media files)
20. Two 302s for Crystal Grider
21. U.S. Capitol Police footage (15 files, zipped)
22. Video of KWTX Interview of Defendant
23. Open-Source Videos (10 files, zipped)
24. 2 Videos from “bgonthescene”

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.

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.

This material is subject to the terms of the Protective Order issued in this case.

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.

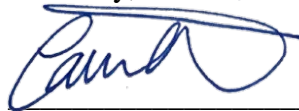
I request reciprocal discovery to the fullest extent provided by Rule 16 of the Federal Rules of Criminal Procedure, including results or reports of any physical or mental examinations, or scientific tests or experiments, and any expert witness summaries. I also request that defendant(s) disclose prior 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,

A handwritten signature in blue ink, appearing to read "Candice", written over a horizontal line.

Candice C. Wong  
Assistant United States Attorney  
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