



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*

July 8, 2021

Via Email

Michael E. Lawlor  
Nicholas G. Madiou  
Brennan, McKenna & Lawlor, Chtd.  
6305 Ivy Lane, Suite 700  
Greenbelt, MD 20770  
[mlawlor@verizon.net](mailto:mlawlor@verizon.net)  
[nickmadiou@gmail.com](mailto: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. Excerpts of Metropolitan Police Department body worn camera footage from Upper House Door exit (24 videos)
2. Open-source videos of shooting (Parler video of defendant's statements upon exiting; two videos of shooting; video of defendant in Crypt)
3. MARKED SENSITIVE: Videos obtained from other Capitol investigations (18 files):
  - a. D-2 – 3 photographs, 1 video
  - b. D-3 – 3 videos
  - c. D-4 – 1 video
  - d. D-5 – 1 video
  - e. D-6 – 1 video
  - f. D-7 – 1 video
  - g. W-4 – 2 videos
  - h. W-5 – 1 video
  - i. W-6 – 4 videos
4. MARKED SENSITIVE: Officer interview transcripts (2 files)
5. Search Warrant and Search Warrant Return for defendant's 4 devices

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,

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

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