

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

**UNITED STATES OF AMERICA** :  
 :  
 : **CASE NO. 1:1:23-cr-00066-ZMF**  
 :  
 **v.** :  
 :  
 :  
 **REBECCA LAVRENZ,** :  
 :  
 :  
 **Defendant.** :

**DEFENDANT LAVRENZ’S MOTION TO COMPEL PRODUCTION OF DISCOVERY  
AND UNREDACTED DOCUMENTS**

COMES NOW the Defendant Rebecca Lavrenz with this Motion to compel production of certain discovery and unredacted documents. These documents are relevant, material, and likely exculpatory for the defendant. Defendant requests compulsion of the following:

- 1) The unredacted 302 report of FBI agent John David Guandolo
- 2) The two (2) unredacted 302 reports of the two FBI agents at John David Guandolo’s side on January 6, 2021.
- 3) The identities of the two FBI agents accompanying Guandolo.
- 4) All video or audio recordings of the 302 interview of John David Guandolo, and,

- 5) All transcripts of any of these FBI agents' testimony before the January 6 Committee of Congress.

## **BACKGROUND**

Defendant Rebecca Lavrenz was present on the east side of the Capitol on January 6, 2021 where, among other things, she attended a prayer rally sponsored by Women For a Great America. Also present with Lavrenz (although Lavrenz didn't know it at the time) were three plainclothes FBI agents, including John David Guandolo. The presence of these three undercover/plain-clothed agents is relevant and material to Lavrenz case for obvious reasons; including:

A) Guandolo and the other agents were positioned at the precise location as Lavrenz at the Women For a Great America rally.

B) Lavrenz is accused of entering and remaining in restricted areas.

However, Guandolo's 302 interview states that Guandolo "described the events as a 'patriotic tailgate' and not an insurrection."

C) Guandolo "described watching large groups of individuals walking up the steps of the US Capitol building with flags and signs and being allowed inside by the Capitol Police Officers."

- D) Thus, Guandolo's description of Lavrenz and others' approach to the Capitol building is exculpatory. Guandolo is literally a former FBI liaison to the Capitol Police.
- E) Guandolo and the other agents are eyewitnesses to Lavrenz's conduct on January 6.
- F) Guandolo was filming on January 6<sup>th</sup> and recorded Lavrenz's approach to the Capitol. Video of Guandolo and the footage he filmed can be viewed here:
- <https://www.dropbox.com/scl/fi/i0j4xw078b0ownf1drurw/Guandolos-Clapping-FBI-Colleage.mpg?rlkey=1w1f9ijpelj08fjmx6bqjdnqy&dl=0>

Although the heavily-redacted 302 (attached) describes Guandolo's presence as being to "support a prayer group" along with Dr. Burton Purvis, the heavy redactions indicate there is more to the story behind the agents' presence at the Capitol on January 6, 2021. Lavrenz has a right to know the context behind these redactions.

Lavrenz's counsel has exhausted all efforts to obtain these necessary, material, and relevant materials. (See Attachment 2)

For these reasons, Lavrenz prays for an order compelling the United States to provide the materials described.

Dated: March 24, 2024

Respectfully Submitted,

/s/ John M. Pierce

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CERTIFICATE OF SERVICE

I certify that I uploaded this document to the Court's ECF system, serving all parties of record.

/s/ John M. Pierce

John M. Pierce

Attachments:

- 1.) 302 of John Guandolo
- 2.) Email Chain with Defense Counsel and AUSA regarding the material in question
- 3.) Video of Former FBI Liaison to the Capitol Police John Guandolo can be viewed here:  
<https://www.dropbox.com/scl/fi/i0j4xw078b0ownf1drurw/Guandolos-Clapping-FBI-Colleage.mpg?rlkey=1w1f9jpe1j08fjmx6bqjdnqy&dl=0>