

Joshua Adam Schulte, *pro se*

FILED UNDER SEAL  
BY HAND

April 29, 2022

Judge Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**RE: *United States v. Joshua Adam Schulte*, S3 17 Cr. 548 (JMF)**

Dear Judge Furman:

The government recently produced new discovery regarding [REDACTED]. As the government informed the Court at the last pretrial conference, it does not intend to use any of this newly produced discovery at trial. This is not surprising as the information appears to be relevant and helpful to the defense. After conducting a complete review of this material, I intend to introduce this material at trial. I hereby move the Court to (i) order further discovery productions including [REDACTED], (ii) requisition funds to hire an investigator [REDACTED], and (iii) remove this information from the unclassified protective order (including this letter filed under seal) so I can file references and exhibits to this information in motions, and for introduction at trial, particularly [REDACTED].

As an initial matter, the government produced the relevant discovery on April 6, 2022 as production 36. The production contains [REDACTED]. This production includes [REDACTED].

[REDACTED]

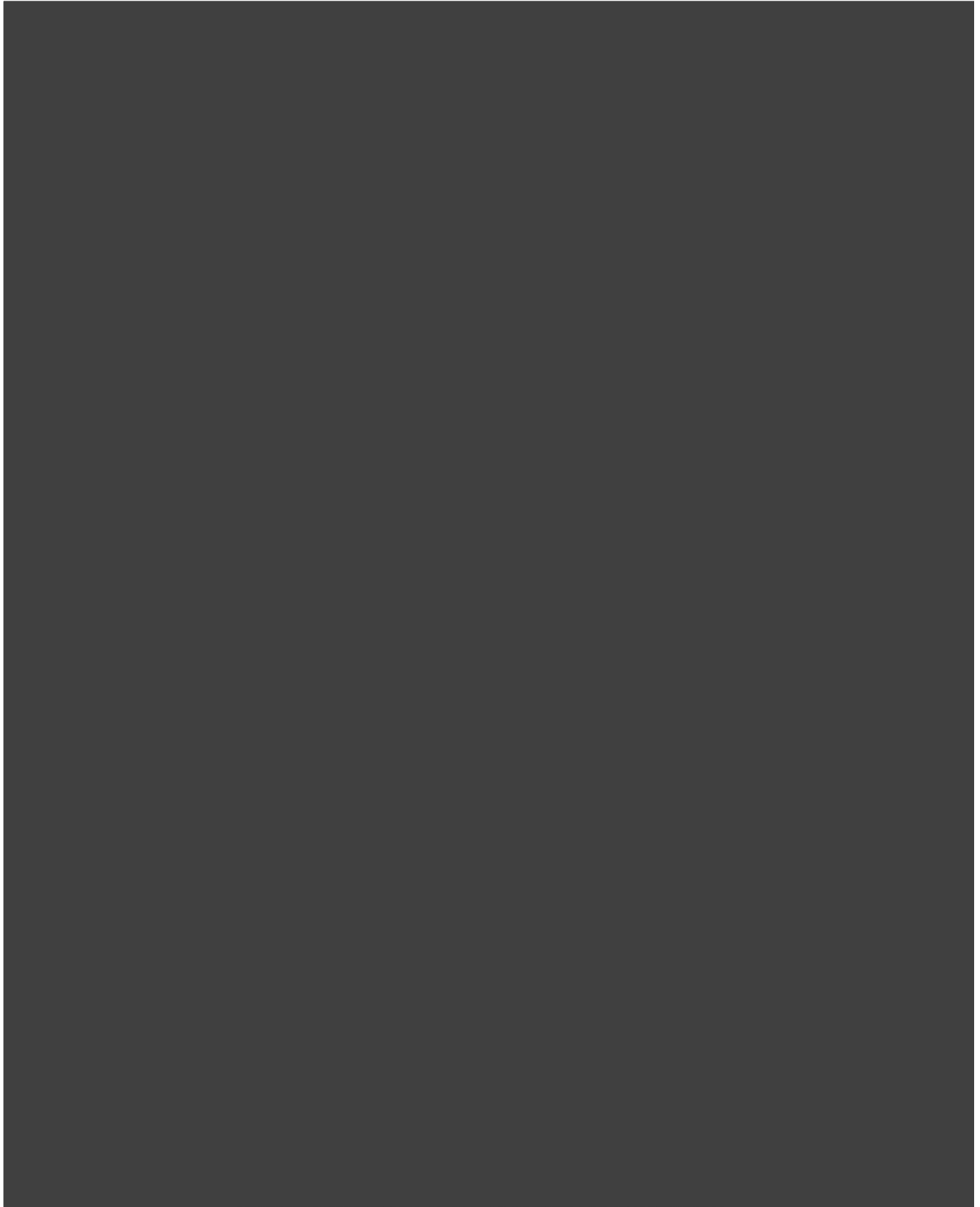
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

*United States v. Schulte*, S3 17 Cr. 548 (JMF); April 29, 2022 letter from *pro se* defendant



*United States v. Schulte*, S3 17 Cr. 548 (JMF); April 29, 2022 letter from *pro se* defendant

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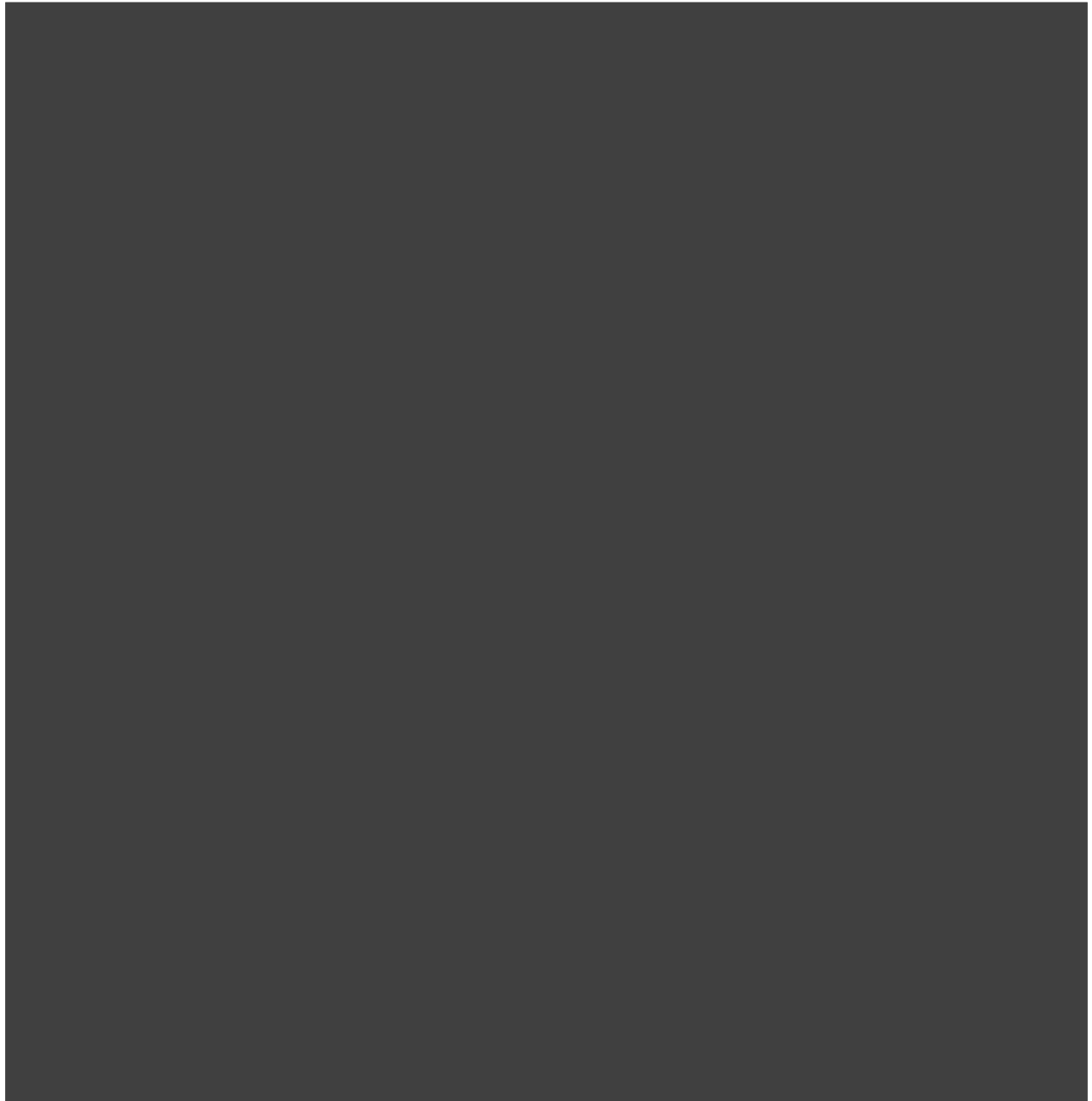
This information is important because it indicates [REDACTED]

[REDACTED] It also undermines the government's argument that I must be guilty because I supposedly wanted to harm the CIA— [REDACTED]

[REDACTED] This simply does not jive with the government's alleged motive.

Moreover, this seems to confirm not only that [REDACTED]

*United States v. Schulte*, S3 17 Cr. 548 (JMF); April 29, 2022 letter from *pro se* defendant



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It seems that [REDACTED] I move the Court to order the government to produce all other information related to [REDACTED] including the materials it [REDACTED] This information may provide [REDACTED] [REDACTED] it is likely to be exculpatory.

*United States v. Schulte*, S3 17 Cr. 548 (JMF); April 29, 2022 letter from *pro se* defendant

Finally, it appears that the CIA data may have been hacked directly from DevLAN, which was acknowledged to be "the Wild, Wild West" and incredibly insecure. [REDACTED]

[REDACTED]

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Accordingly, there can be no question of the relevance and importance of this material for the upcoming trial. The Court should (i) order the government to produce the full [REDACTED] discovery including the materials [REDACTED] the materials [REDACTED] [REDACTED] and any other relevant information, (ii) requisition funds for an investigator [REDACTED] [REDACTED] and (iii) remove this material from the unclassified protective order for use in motions and at trial.

Respectfully submitted,

Joshua Adam Schulte

