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U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 8, 2022

Delivered to Courthouse SCIF

Joshua Adam Schulte
Reg. No. 79471-054
MDC Brooklyn
P.O. Box 329002
Brooklyn, NY 11232

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

Dear Mr. Schulte:

(U) The Government herein provides both classified and unclassified discovery in the above-referenced case.

~~(S//NF)~~ The classified portion of the Government's production includes data obtained in a separate investigation being conducted by another U.S. Attorney's Office [REDACTED]

[REDACTED]

The Government has produced these materials in forensic cases accessible through the AD Labs discovery platform hosted on the self-contained computer network created by the FBI, which is housed in the defense SCIF at the courthouse at 500 Pearl Street. These materials are being produced pursuant to the "Amended Protective Order Pertaining to Classified Information," which was entered by the Court on March 14, 2022.

[REDACTED]

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Joshua A. Schulte
April 8, 2022
Page 2

[REDACTED]
[REDACTED] As a courtesy, the Government has also included in this production [REDACTED]
[REDACTED]

[REDACTED] All of this material, including the description of it in this letter, has been marked "USG-CONFIDENTIAL" and is subject to the limitations on disclosure set forth in the Protective Order pertaining to unclassified discovery which was entered by the Court on September 18, 2017.

(U) Please feel free to contact us with any questions you may have.

Sincerely yours,

DAMIAN WILLIAMS
United States Attorney

By: /s/
David W. Denton, Jr. / Michael D. Lockard
Assistant United States Attorneys
(212) 637-2744/2193

CC: Standby Counsel (by delivery to Courthouse SCIF)

Enclosures

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U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 21, 2022

BY HAND TO COURTHOUSE SCIF

Joshua Adam Schulte
Reg. No. 79471-054
MDC Brooklyn
P.O. Box 329002
Brooklyn, NY 11232

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

Dear Mr. Schulte:

~~(S//NF)~~ Enclosed with this letter is a Memorandum from [REDACTED] at the Central Intelligence Agency ("CIA"), and related materials which are being produced pursuant to the Amended CIPA Protective Order in this matter. These materials are classified [REDACTED]. Also enclosed is a duplicate copy of discovery [REDACTED] described in our letter dated April 8, 2022, as requested by standby counsel.

~~(S//NF)~~ We also write to inform you that the Government has obtained data gathered in a separate investigation being conducted by another U.S. Attorney's Office [REDACTED]

[REDACTED] The Government does not intend to offer evidence relating [REDACTED] in its case-in-chief.

(U) Finally, we confirm, as previously discussed, that a hard drive containing digital evidence items S49, S50, and S51 has been made available in the courthouse SCIF in a locked safe. This hard drive is subject to Adam Walsh Act procedures and is available for your review upon request to the FBI.

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~~SECRET//NOFORN PENDING CLASSIFICATION REVIEW~~

Joshua A. Schulte
April 21, 2022
Page 2

(U) Should you have any questions, please do not hesitate to contact us.

Sincerely,

DAMIAN WILLIAMS
United States Attorney

By: /s/
David W. Denton, Jr.
Michael D. Lockard
Assistant United States Attorneys
(212) 637-2744 / -2193

cc: Standby counsel (by delivery to Courthouse SCIF)

Encl.

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U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 6, 2022

BY HAND TO COURTHOUSE SCIF

Joshua Adam Schulte
Reg. No. 79471-054
MDC Brooklyn
P.O. Box 329002
Brooklyn, NY 11232

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

Dear Mr. Schulte:

~~(S//NF)~~ Enclosed with this letter are three discs containing records described in our letter dated April 21, 2022. These discs contain

disclosures remain classified except to the extent specific materials have been declassified in connection with this prosecution.

~~(S//NF)~~
We understand that the agents conducting or assisting with that other investigation are in the process of reviewing the contents of the seized items. At this time, we are not aware of the presence of data related to the disclosures on these seized items. To the extent that such data is identified, we will make additional disclosures of relevant, discoverable information. Due to the number of items seized, the large data volume of some of the items, and the presence of encrypted data on some of the items, the review of the contents of any or all of the seized items will likely not be complete until after the conclusion of the trial scheduled to begin on June 14, 2022.

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~~SECRET//NOFORN PENDING CLASSIFICATION REVIEW~~

Joshua A. Schulte
May 6, 2022
Page 2

(U) Should you have any questions, please do not hesitate to contact us.

Sincerely,

DAMIAN WILLIAMS
United States Attorney

By: /s/
David W. Denton, Jr.
Michael D. Lockard
Assistant United States Attorneys
(212) 637-2744 / -2193

cc: Standby counsel (by delivery to Courthouse SCIF)

Encl.