

Date: 1/8/2021

Assigned Assistant United States Attorney
Office of the United States Attorney
555 4th Street, NW
Washington D.C.
BY HAND IN C-10

Case No: 2021 CMD 000186

Re: United States v. Chris Georgia

Dear Assigned AUSA

I am requesting that you preserve all physical evidence material to the preparation of my client's defense, including but not limited to all property allegedly belonging to all complaining witnesses and my client, unless such property is released directly to my client of his/her authorized designate. This preservation request is served in part to ensure that counsel has an opportunity to conduct tests and examinations on any physical property that counsel deems appropriate and necessary. As you are aware, many government cameras loop over footage every 10 to 30 days. In addition, body worn camera footage is looped over on a regular schedule. I ask that you preserve the footage related to this case immediately to avoid destruction issues.

Also, pursuant to Superior Court Rule of Criminal Procedure 16 and *Brady v. Maryland*, 373 U.S. 83 (1963), I hereby request the production of all discovery and all other evidence that tends to exculpate my client. Rule 16 explicitly provides that upon request, "the government must disclose" and "shall permit" inspection and copying of all material covered by the Rule. As such, I request that all discoverable material be disclosed immediately, but in no event later than the preliminary hearing or status hearing in this case.

Thank you in advance for your prompt attention to this matter.

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