

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 22-cr-200
	:	
PETER K. NAVARRO,	:	
	:	
Defendant.	:	

UNITED STATES' RESPONSE TO DEFENDANT'S MOTION FOR DISCOVERY

The Defendant, Peter K. Navarro, has moved for the production of various records relating to his arrest. Specifically, the Defendant seeks video and audio recordings from his arrest, transcripts of all conversations that took place, notes used to create the FBI report memorializing the arrest, and signed affidavits from FBI Special Agents describing the arrest. To the Government's knowledge, aside from agent notes relating to the FBI report memorializing the Defendant's arrest, the materials the Defendant seeks do not exist or, to the extent they may exist, are not in the possession, custody, or control of the prosecution team—for example, any video recordings Reagan National Airport might make of its jetways. In any event, none of the material the Defendant seeks is discoverable under Federal Rule of Evidence 16 or *Brady v. Maryland* and its progeny. The Defendant was not questioned upon his arrest, *see* Fed. R. Crim. P. 16(a)(1)(A) & (B), and none of the other information is relevant or material to either the Government's case-in-chief or the Defendant's response to it, *see* Fed. R. Crim. P. 16(a)(1)(E); *United States v. Armstrong*, 517 U.S. 456, 462 (1996); *Brady v. Maryland*, 373 U.S. 83, 87 (1963). Nevertheless, the Government is, and has been, prepared to provide the agent notes, along with the discovery in this matter, as soon as its motion for a protective order is resolved.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

By: /s/ Amanda R. Vaughn
Molly Gaston (VA 78506)
Amanda R. Vaughn (MD)
Elizabeth Aloï (D.C. 1015864)
Assistant United States Attorneys
United States Attorney's Office
601 D Street, N.W.
Washington, D.C. 20530
(202) 252-1793 (Vaughn)
amanda.vaughn@usdoj.gov

CERTIFICATE OF SERVICE

I certify that, on June 13, 2022, I provided a copy of the United States' Response to the Defendant's Motion for Discovery to the Defendant by email.

/s/ Amanda R. Vaughn

Amanda R. Vaughn

Assistant United States Attorney