

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CRIMINAL DIVISION**

UNITED STATES	:	Case No.	2026 CF2 010237
	:		
v.	:	Hon.	FELONY 2 CAL 3
	:		
DAVID CARTER HEARN	:		
	:		
Defendant.	:		

NOTICE OF FILING

The government requests that the attached discovery letter, dated July 10, 2026, be made part of the record in this case.

Respectfully Submitted,

JEANINE FERRIS PIRRO
United States Attorney

By: /s/ Kadian D. Carter
Kadian D. Carter
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U.S. Department of Justice
Jeanine Ferris Pirro
United States Attorney
District of Columbia

601 D Street NW
Washington, DC 20530

7/10/2026

VIA EVIDENCE.COM

Mary Dohrmann

Re: United States v. David Carter Hearn
Case No. 2026 CF2 010237

Dear Counsel:

I. Response to Discovery Requests

I am writing in response to your request for discovery under Rule 16. As you are aware, the government provides discovery on an ongoing basis. The government's response to any specific discovery demands in your *Rosser* letter(s) will be provided in accordance with our discovery obligations and/or court-imposed deadlines.

Pursuant to Superior Court Criminal Rule 16-I, motions for discovery under Rule 16 cannot be filed unless "defense counsel certifies, in writing, that counsel has made a good faith attempt to secure the requested relief voluntarily from the attorney for the government, and that the attorney for the government has not complied." In accordance with Rule 16-I, if you believe you are missing materials or information disclosable under Rule 16, you should contact the undersigned in sufficient time before raising the issue with the Court (orally or in writing), so that the government has an opportunity to voluntarily provide the materials and/or information you seek.

A. Attached Files for Defense Attorney Disclosure Portal

The following discovery has been uploaded into Evidence.com in this matter. **Material may be subject to protective orders entered in this case.**

1. COUNSEL ONLY Attachment
Delivered to Defense Attorney via Disclosure Portal
Neither attached to nor referenced in court filing
2. Report Packet - C-26-0000081879 Report Packet- Vandalism- 1 arrest_
Delivered to Defense Attorney via Disclosure Portal
3. C-26-0000081879 Witness Statement_
Delivered to Defense Attorney via Disclosure Portal

4. Arrest # 532617046 USPP # C-26-0000081879 Combined Report vandalism-1
arrest - Reflecting Pool
Delivered to Defense Attorney via Disclosure Portal
5. Axon_Body_3_Video_2026-06-19_1541_X60A3730V
Delivered to Defense Attorney via Disclosure Portal
6. Axon_Body_3_Video_2026-06-19_1540_X60A2838G
Delivered to Defense Attorney via Disclosure Portal
7. Axon_Body_3_Video_2026-06-19_2112_X60A3730V
Delivered to Defense Attorney via Disclosure Portal
8. Axon_Body_3_Video_2026-06-19_2003_X60A3730V
Delivered to Defense Attorney via Disclosure Portal
9. Axon_Body_3_Video_2026-06-19_1828_X60A3730V
Delivered to Defense Attorney via Disclosure Portal
10. Axon_Body_3_Video_2026-06-19_1722_X60A3730V
Delivered to Defense Attorney via Disclosure Portal
11. Axon_Body_3_Video_2026-06-19_1712_X60AA514E
Delivered to Defense Attorney via Disclosure Portal
12. Axon_Body_3_Video_2026-06-19_1656_X60AA244E
Delivered to Defense Attorney via Disclosure Portal
13. Axon_Body_3_Video_2026-06-19_1643_X60A40830
Delivered to Defense Attorney via Disclosure Portal
14. Axon_Body_3_Video_2026-06-19_1640_X60AA244E
Delivered to Defense Attorney via Disclosure Portal
15. Axon_Body_3_Video_2026-06-19_1640_X60A3730V
Delivered to Defense Attorney via Disclosure Portal
16. Axon_Body_3_Video_2026-06-19_1640_X60A3730V (1)
Delivered to Defense Attorney via Disclosure Portal
17. Axon_Body_3_Video_2026-06-19_1549_X60A3730V
Delivered to Defense Attorney via Disclosure Portal
18. Axon_Body_3_Video_2026-06-19_1541_X60A40830
Delivered to Defense Attorney via Disclosure Portal
19. COUNSEL ONLY Attachment
Delivered to Defense Attorney via Disclosure Portal
Neither attached to nor referenced in court filing
20. COUNSEL ONLY Attachment
Delivered to Defense Attorney via Disclosure Portal
Neither attached to nor referenced in court filing
21. COUNSEL ONLY Attachment

- Delivered to Defense Attorney via Disclosure Portal
Neither attached to nor referenced in court filing*
22. COUNSEL ONLY Attachment
*Delivered to Defense Attorney via Disclosure Portal
Neither attached to nor referenced in court filing*
23. COUNSEL ONLY Attachment
*Delivered to Defense Attorney via Disclosure Portal
Neither attached to nor referenced in court filing*
24. COUNSEL ONLY Attachment
*Delivered to Defense Attorney via Disclosure Portal
Neither attached to nor referenced in court filing*
25. IMG_0635
Delivered to Defense Attorney via Disclosure Portal
26. IMG_0636
Delivered to Defense Attorney via Disclosure Portal
27. IMG_0637
Delivered to Defense Attorney via Disclosure Portal
28. GERU
Delivered to Defense Attorney via Disclosure Portal
29. Indictment for DC Hearn
Delivered to Defense Attorney via Disclosure Portal
30. 20260630_LMRP_Damage Assessment for DOI
Delivered to Defense Attorney via Disclosure Portal
31. COUNSEL ONLY Attachment
*Delivered to Defense Attorney via Disclosure Portal
Neither attached to nor referenced in court filing*
32. COUNSEL ONLY Attachment
*Delivered to Defense Attorney via Disclosure Portal
Neither attached to nor referenced in court filing*
33. COUNSEL ONLY Attachment
*Delivered to Defense Attorney via Disclosure Portal
Neither attached to nor referenced in court filing*
34. COUNSEL ONLY Attachment
*Delivered to Defense Attorney via Disclosure Portal
Neither attached to nor referenced in court filing*

B. Defendant Statements

Super. Ct. Crim. R. 16(a)(1)(A), (B)

The government will provide materials to you in discovery for any statements made by your client that are disclosable under Rule 16. The government reserves the right to use in its case-in-chief at trial all statements made by your client that the government provides to you in discovery.

C. Defendant's Prior Record

Super. Ct. Crim. R. 16(a)(1)(D)

Please refer to the Pretrial Services Report provided to the defense at presentment for further information about your client's prior criminal record. If the government becomes aware of any additional convictions or adjudications beyond those contained in Pretrial Services Report, the government will notify you.

D. Documents and Objects

Super. Ct. Crim. R. 16(a)(1)(E)

Upon request, you are entitled to inspect and copy or photograph certain books, papers, documents, photographs, tangible objects, buildings or places that are within the possession, custody or control of the government. *See* Super. Ct. Crim. R. 16(a)(1)(E). If you would like to view any of the evidence described in the discovery you receive, please contact the undersigned prosecutor who will make arrangements for you or your certified investigator to inspect the evidence. These arrangements will include a condition that you not raise any objection to the admissibility of such evidence at trial because of the break in the chain-of-custody occasioned by your inspection. Please note that any such items that are undergoing forensic testing will be unavailable for inspection until after the testing is completed.

Please be aware that the method by which you inspect the evidence may affect the ability to obtain forensic testing of any material that is recovered. Handling and viewing the evidence in an uncontrolled environment may lead to contamination of the evidence and render any subsequent forensic testing unreliable.

At trial, the government may seek to introduce any of the evidence identified in the materials that the government provides to you in discovery.

E. Reports of Examinations or Tests and Expert Witnesses

Super. Ct. Crim. R. 16(a)(1)(F), (G)

The government may seek to introduce expert reports and/or testimony at trial and will comply with its obligations pursuant to Super. Ct. Crim. R. 16(a)(1)(F) and (G).

F. Records of a Regularly Conducted Activity/Certified Records

Pursuant to D.C. Code § 14-508(c), the government is hereby providing notice that the government intends to introduce the following records at trial as self-authenticating records of regularly conducted activity under D.C. Code § 14-508.

The government may provide supplemental notice of its intention to introduce records at trial as self-authenticating records of regularly conducted activity under D.C. Code § 14-508. If you intend to object to the introduction of the records as self-authenticating, please let me know reasonably in advance of trial so that we may address it with the Court.

G. Other Crimes Evidence

In addition to any information contained in the files disclosed with this letter, the government will provide you with separate notice if the government intends to introduce at trial other crimes evidence pursuant to *Drew v. United States*, 331 F.2d 85 (D.C. 1964).

H. Identification Procedures

To the extent it exists, the source materials related to any identification procedures will be provided in discovery.

II. Government's Reciprocal Discovery Demand

The government makes the following reciprocal discovery requests:

- a. Notice of and copies of (or the ability to inspect) any items, including documents and tangible objects, that the defendant expects to use at trial pursuant to Super. Ct. Crim. R. 16(b);
- b. A *Jencks Act* request for all prior statements of any defense witness (excluding the defendant) pursuant to Super. Ct. Crim. R. 26.2 and 18 U.S.C. § 3500;
- c. A *Lewis* request, for which the government requests the name, date of birth, sex, and social security number of each defense witness in sufficient time before the witness's testimony; and
- d. A request for information pertaining to any expert or scientific testimony or evidence pursuant to Rule 16(b)(1)(B) and (C).

Pursuant to Super. Ct. Crim. R. 16(c), the government notes its continuing request to receive any material pursuant to Rule 16(b) as the case proceeds.

If you have any questions about the information provided above or believe you are missing any items, please contact the undersigned prosecutor.

Sincerely,

JEANINE FERRIS PIRRO
United States Attorney

/s/ Kadian D. Carter

Kadian D. Carter

AUSA

United States Attorney's Office

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