

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

UNITED STATES	:	Case No.	2026 CF2 010237
	:		
v.	:	Hon.	FELONY 1 CAL 1
	:		
DAVID CARTER HEARN	:		
	:		
Defendant.	:		

NOTICE OF FILING

The government requests that the attached discovery letter, dated July 17, 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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United States Attorney's Office
Phone: (202) 252-6971
E-mail: kadian.carter@usdoj.gov



U.S. Department of Justice
Jeanine Ferris Pirro
United States Attorney
District of Columbia

601 D Street NW
Washington, DC 20530

7/17/2026

VIA EVIDENCE.COM

Mary Dohrmann

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

Dear Counsel:

I. Supplemental Response to Request for Discovery

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. processed-4A285E05-2B43-417F-98E1-92E856BC68DB
Delivered to Defense Attorney via Disclosure Portal
2. processed-8E41292B-7199-4135-96D2-0887D257CF20
Delivered to Defense Attorney via Disclosure Portal
3. processed-6D8E58A3-C080-40BC-A382-3CDB3289CE9E
Delivered to Defense Attorney via Disclosure Portal

4. processed-DFE4B2BD-1340-4999-89E1-45E92FFB6C85
Delivered to Defense Attorney via Disclosure Portal
5. processed-7BD10B89-BC37-4843-A0FB-1800EBDC2FF6
Delivered to Defense Attorney via Disclosure Portal
6. processed-117B5F81-1490-4FAF-9EDC-0FE9C9DA5302
Delivered to Defense Attorney via Disclosure Portal
7. processed-E8B1FD0C-6827-465F-9C9D-798DEBB7EB56
Delivered to Defense Attorney via Disclosure Portal
8. processed-03B62B89-2CF3-4457-BB48-5AD2EF4641F5
Delivered to Defense Attorney via Disclosure Portal
9. processed-DFD463AA-803F-4844-A31D-5CAE27705AF9
Delivered to Defense Attorney via Disclosure Portal
10. processed-58FF4E6B-45E8-444F-8707-94E390D28DFB
Delivered to Defense Attorney via Disclosure Portal
11. processed-5AA09409-ADBC-4E5F-B4A3-8A37F7C41905
Delivered to Defense Attorney via Disclosure Portal
12. IMG_0168
Delivered to Defense Attorney via Disclosure Portal
13. IMG_0167
Delivered to Defense Attorney via Disclosure Portal
14. IMG_0166
Delivered to Defense Attorney via Disclosure Portal
15. IMG_0164
Delivered to Defense Attorney via Disclosure Portal
16. IMG_0165
Delivered to Defense Attorney via Disclosure Portal
17. IMG_0161
Delivered to Defense Attorney via Disclosure Portal
18. IMG_0163
Delivered to Defense Attorney via Disclosure Portal
19. IMG_0162
Delivered to Defense Attorney via Disclosure Portal
20. IMG_0169
Delivered to Defense Attorney via Disclosure Portal
21. IMG_0172
Delivered to Defense Attorney via Disclosure Portal
22. IMG_0173

- Delivered to Defense Attorney via Disclosure Portal*
23. IMG_0170
Delivered to Defense Attorney via Disclosure Portal
24. IMG_0171
Delivered to Defense Attorney via Disclosure Portal
25. IMG_0014
Delivered to Defense Attorney via Disclosure Portal
26. IMG_0015
Delivered to Defense Attorney via Disclosure Portal
27. IMG_0011
Delivered to Defense Attorney via Disclosure Portal
28. IMG_0012
Delivered to Defense Attorney via Disclosure Portal
29. IMG_0016
Delivered to Defense Attorney via Disclosure Portal
30. IMG_0017
Delivered to Defense Attorney via Disclosure Portal
31. IMG_0018
Delivered to Defense Attorney via Disclosure Portal
32. IMG_0035
Delivered to Defense Attorney via Disclosure Portal
33. IMG_0036
Delivered to Defense Attorney via Disclosure Portal
34. IMG_0034
Delivered to Defense Attorney via Disclosure Portal
35. IMG_0037
Delivered to Defense Attorney via Disclosure Portal
36. IMG_0038
Delivered to Defense Attorney via Disclosure Portal
37. IMG_0040
Delivered to Defense Attorney via Disclosure Portal
38. IMG_0039
Delivered to Defense Attorney via Disclosure Portal
39. IMG_0041
Delivered to Defense Attorney via Disclosure Portal
40. IMG_0029
Delivered to Defense Attorney via Disclosure Portal

41. IMG_0025
Delivered to Defense Attorney via Disclosure Portal
42. IMG_0028
Delivered to Defense Attorney via Disclosure Portal
43. IMG_0027
Delivered to Defense Attorney via Disclosure Portal
44. IMG_0194
Delivered to Defense Attorney via Disclosure Portal
45. IMG_0193
Delivered to Defense Attorney via Disclosure Portal
46. IMG_0189
Delivered to Defense Attorney via Disclosure Portal
47. IMG_0191
Delivered to Defense Attorney via Disclosure Portal
48. IMG_0184
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49. IMG_0183
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50. IMG_0181
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51. IMG_0188
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52. IMG_0187
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53. IMG_0190
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54. IMG_0185
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55. IMG_0182
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56. IMG_0186
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57. IMG_0192
Delivered to Defense Attorney via Disclosure Portal
58. IMG_0174
Delivered to Defense Attorney via Disclosure Portal
59. IMG_0176

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60. IMG_0178
Delivered to Defense Attorney via Disclosure Portal
61. IMG_0177
Delivered to Defense Attorney via Disclosure Portal
62. IMG_0175
Delivered to Defense Attorney via Disclosure Portal
63. IMG_0179
Delivered to Defense Attorney via Disclosure Portal
64. processed-ED8AFEFD-075A-4039-98A8-FCBC1C3BCCF4
Delivered to Defense Attorney via Disclosure Portal
65. processed-6D20C9DD-847A-45F5-BF5F-573DEC1A45BB
Delivered to Defense Attorney via Disclosure Portal
66. processed-B8B913AE-4D3A-4B48-A96E-FD90A80E868A
Delivered to Defense Attorney via Disclosure Portal
67. processed-2F118148-BC95-4426-AA1C-746978B580A5
Delivered to Defense Attorney via Disclosure Portal
68. IMG_0243
Delivered to Defense Attorney via Disclosure Portal
69. IMG_0244
Delivered to Defense Attorney via Disclosure Portal
70. IMG_0242
Delivered to Defense Attorney via Disclosure Portal
71. processed-A3A1C24C-87E2-4ADC-A1CB-74F94241431F
Delivered to Defense Attorney via Disclosure Portal
72. processed-12E6CF80-59A6-4572-A56A-70AF45C201E0
Delivered to Defense Attorney via Disclosure Portal
73. IMG_0031 Location 11
Delivered to Defense Attorney via Disclosure Portal
74. IMG_0032 Location 11
Delivered to Defense Attorney via Disclosure Portal
75. IMG_0033 Location 11
Delivered to Defense Attorney via Disclosure Portal
76. IMG_0044 Location 11
Delivered to Defense Attorney via Disclosure Portal
77. IMG_0043 Location 11
Delivered to Defense Attorney via Disclosure Portal

78. IMG_0042 Location 11

Delivered to Defense Attorney via Disclosure Portal

II. Additional Disclosures

The government is providing the following information: Subject to Sensitive Materials Protective Order

III. 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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