

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CRIMINAL DIVISION - FELONY BRANCH

UNITED STATES OF AMERICA	:	Case No. 2019 CF2 013134
	:	
v.	:	
	:	Honorable Judge Leibovitz
	:	
Daquade Morton,	:	
Defendant	:	Trial Readiness: March 3, 2023

NOTICE OF FILING

The government requests that the attached discovery letter, dated January 20, 2023, be made part of the record in this case.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney

KATIE EARNEST
Assistant United States Attorney
Chief, General Crimes Trial Section

By: /s/ Julian Ginos
JULIAN GINOS
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U.S. DEPARTMENT OF JUSTICE

MATTHEW M. GRAVES
UNITED STATES ATTORNEY

DISTRICT OF COLUMBIA

January 20, 2023

Re: United States v. Daquade Morton,
Case No. 2019 CF2 013134

Dear Counsel:

I am writing to provide you with certain discovery information for the above-referenced matter.

II. Discovery

Video and photographs captured via Body-Worn Camera (BWC) for this case has been previously disclosed to you. Out of an abundance of caution, however, I have shared the following with you via a link from evidence.com:

ID	Title	Uploaded by
19181837	Felon in Possession	Axon, Interview (TASER003)
19181837	Post arrest interview	Axon, Interview (TASER003)
19181837	Post arrest interview	Axon, Interview (TASER003)
19181837	20191011-SEARCH WARRANT-2311 GREEN ST SE	Holder, John (2992)
19181837	20191011 NEU Ops 2311 Green St SE Apt 201	Hildebrandt, Reginald (10218)
19181837	20191011-SEARCH WARRANT-1311 GREEN ST SE APT 201	Elliott, Rochelle (9410)
19181837	20191011 NEU Ops 2311 Green St SE Apt 201	Hildebrandt, Reginald (10218)
19181837	20191011 TRANSPORT 2311 GREEN ST SE	Perez, Elmer (11528)
19181837	20191011 - SEARCH WARRANT - 2311 GREEN ST SE	Hogan, Patrick (6348)
19181837	20191011 - search warrant - 2311 green street apt 201 se	King, Michael (10670)

19181837	20191011 - search warrant - 2311 green street apt 201 se	King, Michael (10670)
19181837	20191011 - search warrant - 2311 green street apt 201 se	King, Michael (10670)
19181837	20191011 - search warrant - 2311 green street apt 201 se	King, Michael (10670)
19181837	20191011 - search warrant - 2311 green street apt 201 se	King, Michael (10670)
19181837	20191011 - search warrant - 2311 green street apt 201 se	King, Michael (10670)
19181837	20191011 - search warrant - 2311 green street st apt 201 se	King, Michael (10670)
19181837	20191011 - search watrant - 2311 green street st apt 201 se	King, Michael (10670)
19181837	20191011 TRANSPORT 2311 GREEN ST SE	Perez, Elmer (11528)
19181837	20191011 - search warrant - 2311 green street st se apt 201	King, Michael (10670)
19181851, 19181837	AXON Body 2 Video 2019-10-11 1540	Johnson, Deryl (1948)
19181837	Axon Capture Photo 2019-10-11 154024 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 154019 10670	King, Michael (10670)
19181837	20191011-SEARCH WARRANT-2311 GREEN STREET SE APT 201	Randall, Joan (4755)
19181837	Axon Capture Photo 2019-10-11 153849 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 153427 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 153208 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 153101 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 153048 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152714 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152711 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152515 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152510 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152503 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152445 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152434 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152420 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152108 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152047 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152040 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152034 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152029 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152023 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152018 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152017 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152012 10670	King, Michael (10670)

19181837	Axon Capture Photo 2019-10-11 152005 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 152001 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151959 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151948 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151944 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151942 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151937 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151930 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151928 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151925 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151917 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151912 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151905 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151903 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151857 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151847 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151842 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151838 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151833 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151827 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151825 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151818 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151812 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151805 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151804 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151758 10670	King, Michael (10670)
19181837	Axon Capture Photo 2019-10-11 151744 10670	King, Michael (10670)
19181837	20191011-SEARCH WARRANT-2311 GREEN ST SE #201	Giles, Donnita (3690)
19181837	NEU OPS	Wingate-Robinson, Robert (7634)
19181837	20191011- SEARCH WARRANT- 2311 GREEN STREET SE	Floyd, Adam (7596)
19181837, 19-181-837	2311 Green Street S.E.-Search Warrant	Johnson, Deryl (1948)
19181837	20191011-SEARCH WARRANT-1311 GREEN ST SE APT 201	Elliott, Rochelle (9410)
19181837	20191011 NEU Ops 2311 Green St SE Apt 201	Hildebrandt, Reginald (10218)
19181837	20191011 - Search Warrant - 1311 Green St Se #201	Koble, Joshua (10348)

19181837	20191011-NEU OPS-2311 GREEN STREET SE # 201	Turner, Gregory (9350)
19181837	AXON Body 2 Video 2019-10-11 1512	Moe, Ramon (9734)
19181837	20191011 - search warrant - 2311 green street apt 201 se	King, Michael (10670)
19181837	20191011-SEARCH WARRANT-2311 GREEN STREET SOUTHEAST, #201	Young, Vernon (3445)
19181837	20191011 - SEARCH WARRANT - 2311 GREEN ST #201REET SE	Vaughn, Angela (10896)
19181837	20191011 - SEARCH WARRANT - 2311 GREEN ST SE #201	Stout, Andrew (8800)
19181837	20191011-SEARCH WARRANT-2311 GREEN ST SE APT201	Randall, Joan (4755)
19181837	20191011 - SEARCH WARRANT - 2311 GREEN STREET SE #201	Struhar, Andrew (4931)
19180465, 19181837	20191009 - TRANSPORT - 1400 BANGOR ST SE	Brooks-Johnson, Shyanti (8554)
19180465, 19181837	20191009-UCSA POSSESSION OF COCAINE-2200 16th STREET SE	Randall, Joan (4755)
19180465, 19181837	20191009 - NARCOTIC OPERATION - 16TH AND GALEN ST SE	Struhar, Andrew (4931)
19180465, 19181837	2019-10-09 1622 - POSSESSION OF COCAINE -1622 22ND STREET SE	Green, Kief (5999)
19180465, 19181837	AXON Body 2 Video 2019-10-09 1619	Moe, Ramon (9734)
19180465, 19181837	20191009-UCSA POSSESSION OF COCAINE-2200 16TH STREET SE	Randall, Joan (4755)
19180465, 19181837	AXON Body 2 Video 2019-10-09 1617	Stout, Andrew (8800)

Evidence.com contains more than one case file tagged with this case's CCN (19181837). The oldest such case file (from 2019) consists of 91 items, while the second oldest (from 2022) consists of 85 items. The above set of evidence.com files just shared with you consists of 94 items; of these, I would particularly draw your attention to two BWC video recordings uploaded by Sgt. Det. Deryl Johnson:

- 2311 Green Street S.E.-Search Warrant
- AXON Body 2 Video 2019-10-11 1540

2311 Green Street S.E.-Search Warrant appears to capture Sgt. Det. Johnson observing a person tossing a firearm from the rear of the building (this occurs within the first three minutes of the recording). Please download the files you need as soon as possible, as the links will expire in 120 days.

Today, Sgt. Det. Johnson related the following to the undersigned without having reviewed his BWC; please note that what follows is not a verbatim transcript, but rather

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