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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NELDON JOHNSON,

Defendant.

Case No. 2:21cr00513-DS

**RESPONSE TO REQUEST FOR
DISCLOSURE OF EVIDENCE TO BE
USED AT TRIAL**

Judge David Sam

Before the Court is Defendant Neldon JOHNSON's Request for Disclosure of Evidence to be Used at Trial. The defendant requests notice of the evidence the United States intends to use in its case-in-chief at trial pursuant to Rule 12(b)(4) of the Federal Rules of Criminal Procedure.

In accordance with its obligations under Rule 16 of the Federal Rules of Criminal Procedure, the United States has produced discovery in this case and has filed its initial certificate of compliance with a discovery index.

The investigation in this case remains on-going. If additional material becomes available, the United States will continue to comply with its discovery obligations and provide, within a reasonable time, such material discoverable under Rules 16 and 26.2 of the Federal Rules of Criminal Procedure and the Jencks Act.

At trial, the United States may seek to use all physical evidence, statements made by the defendant and others, police reports, phone records, electronic evidence (including body camera footage), documents, and photographs obtained during the investigation.

The United States reserves the right to introduce in its case-in-chief all tangible objects, physical, documentary, and electronic evidence, and all other evidence provided, made available, or identified in discovery.

DATED this 16th day of February, 2022.

ANDREA T. MARTINEZ
United States Attorney

s/Aaron B. Clark
AARON B. CLARK
Assistant United States Attorney