

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

UNITED STATES OF AMERICA)	CRIMINAL NOS. 2008-CF1-27068
)	2008-CF1-26997
v.)	2008-CF1-26996
)	
JOSEPH PRICE)	JUDGE LYNN LEIBOVITZ
VICTOR ZABORSKY)	
DYLAN WARD)	STATUS DATE: 4/23/10

NOTICE OF FILING

The government requests that the attached discovery letter (with attachments), dated April 5, 2010, be made part of the record in this case.

RONALD C. MACHEN JR.
United States Attorney

By:



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CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the attached discovery letter (with attachments) to be served by hand on April 5, 2010, upon Bernard Grimm, Esq., The Army and Navy Building, 1627 I Street, NW, Suite 1100, Washington, DC 20006, counsel for defendant Price, Thomas G. Connolly, Esq., Harris, Wiltshire & Grannis, LLP, 1200 Eighteenth Street, N.W., 12th Floor, Washington, DC 20036-2506, counsel for defendant Zaborsky, and David Schertler, Esq., Schertler & Onorato, LLP, 601 Pennsylvania Avenue NW, North Building, 9th Floor, Washington, DC 20004-2601, counsel for defendant Ward.



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U.S. Department of Justice

Ronald C. Machen Jr.
United States Attorney

District of Columbia

*Judiciary Center
555 Fourth St. N.W.
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April 5, 2010

BY FACSIMILE

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Re: United States v. Joseph Price
Case No. 2008-CF1-27068

United States v. Victor Zaborsky
Case No. 2008-CF1-26997

United States v. Dylan Ward
Case No. 2008-CF1-26996

Dear Counsel:

Per the Court's direction at the March 12, 2010 status hearing, we are writing to identify those specific items of evidence found in defendant Ward's bedroom and commonly referred to as "restraints" that the government may seek to introduce at trial. The items, as previously identified by Mr. Plant and produced via the photographs at Attachment A include:

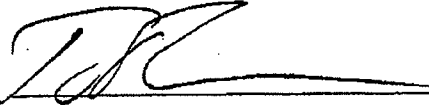
Image 394	Item	#1	Black leather upper torso body harness
		#2	Black leather arm band with "D" ring for possible restraining of arms
		#3	Black leather thin strapped upper torso harness
		#4	Black leather "hog tie" device usually used with leather wrist and ankle restraints to restrain arms and legs from behind
Image 397	Item	#1	Black leather "hog tie" device; same as Item #4 in Image 394
Image 399	Item	#2	Forged metal wrist and ankle restraint
Image 404	Item	#1 & #1a	Black leather heavy duty fist mitt used to restrain hands
Image 405			Black leather upper torso body harness; same as Item #3 in Image 394
Image 407	Item	#1 & #1a	Black leather heavy duty suspension cuffs; used for restraining arms
Image 409	Item	#1	Black leather neck to wrist restraint
Image 410	Item	#1	Black leather heavy duty padded fist mitts; same as seen in Item #1 & 1a in Image 404
Image 412			Black leather prisoner's belt or set of leather wrist restraints
Image 414			Black leather collar and wrist restraints rolled within each other
Image 429	Item	#1 & #1a	Black leather snap-on mouth gags to be attached to a black leather hood such as Item #2 in Image 402

If you have any questions about the information provided above, you may contact us at 202-514-7425 (GK), 202-353-8055 (RCL), or 202-514-7504 (PM).

Sincerely,

RONALD C. MACHIN JR.
United States Attorney

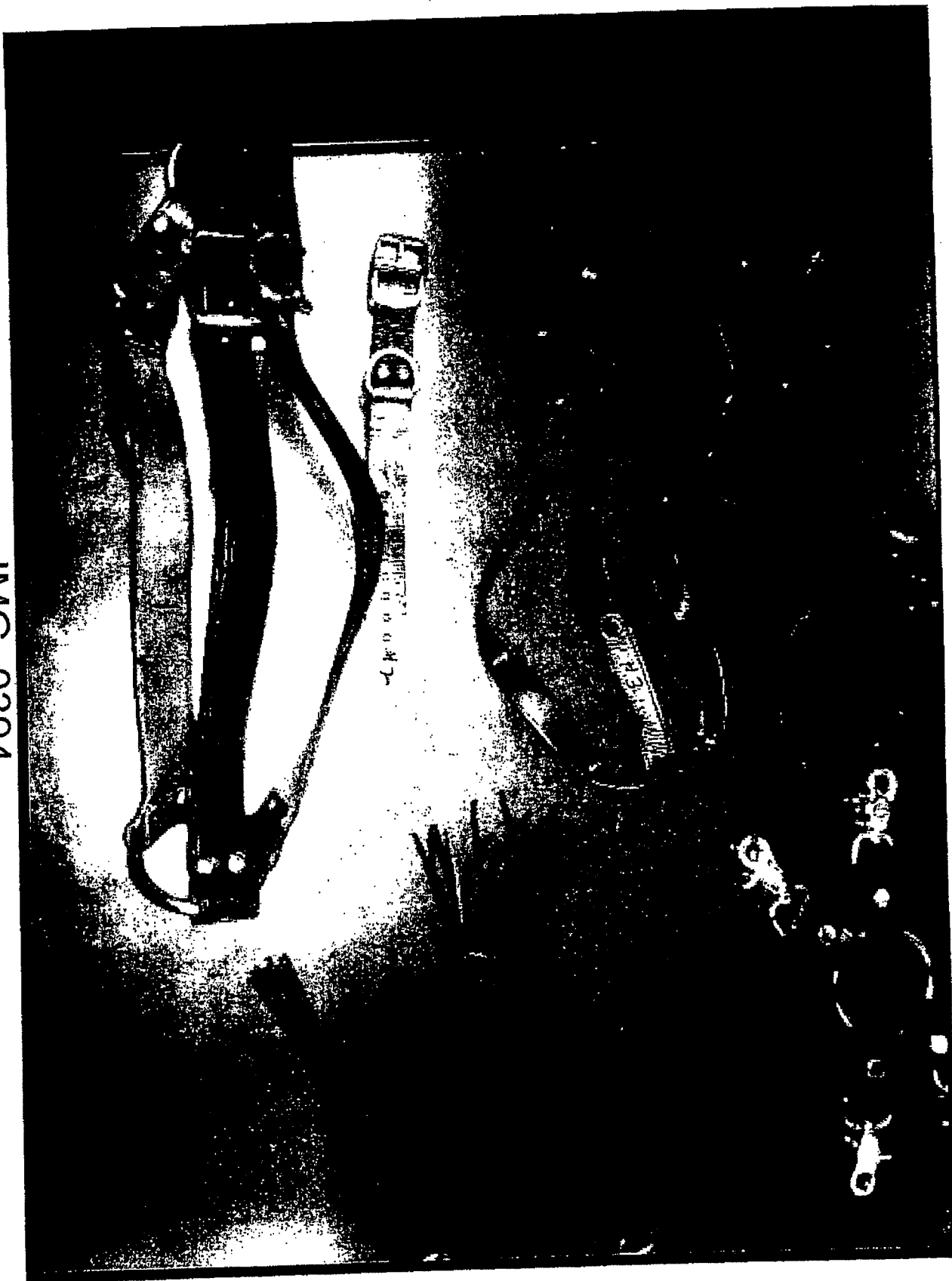
By:

A handwritten signature in black ink, appearing to be 'G. L. Kirschner', written over a horizontal line.

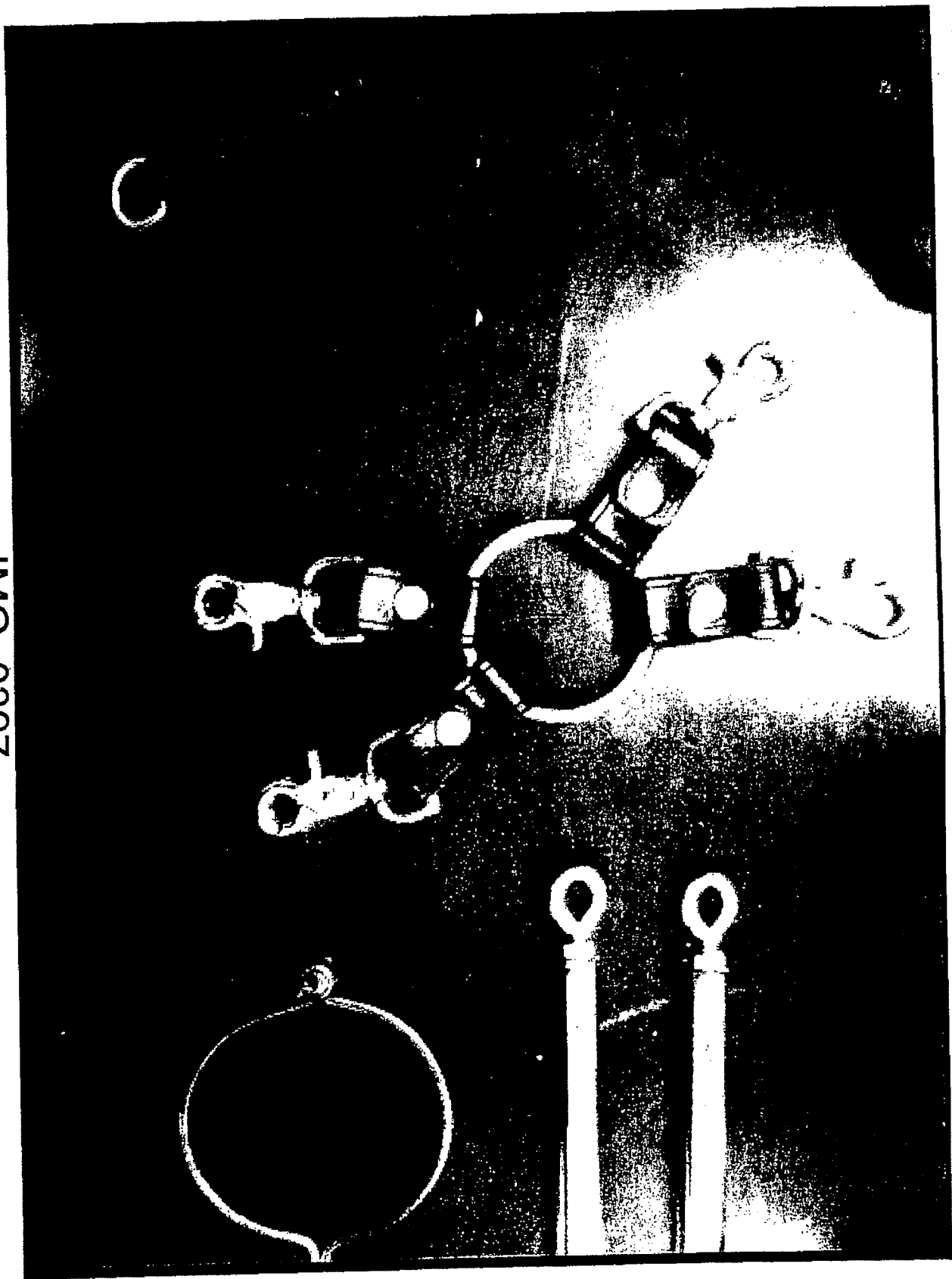
Glenn L. Kirschner
Rachel Carlson Lieber
T. Patrick Martin
Assistant United States Attorneys

cc: Superior Court Case File (w/o attachments)

ATTACHMENT A



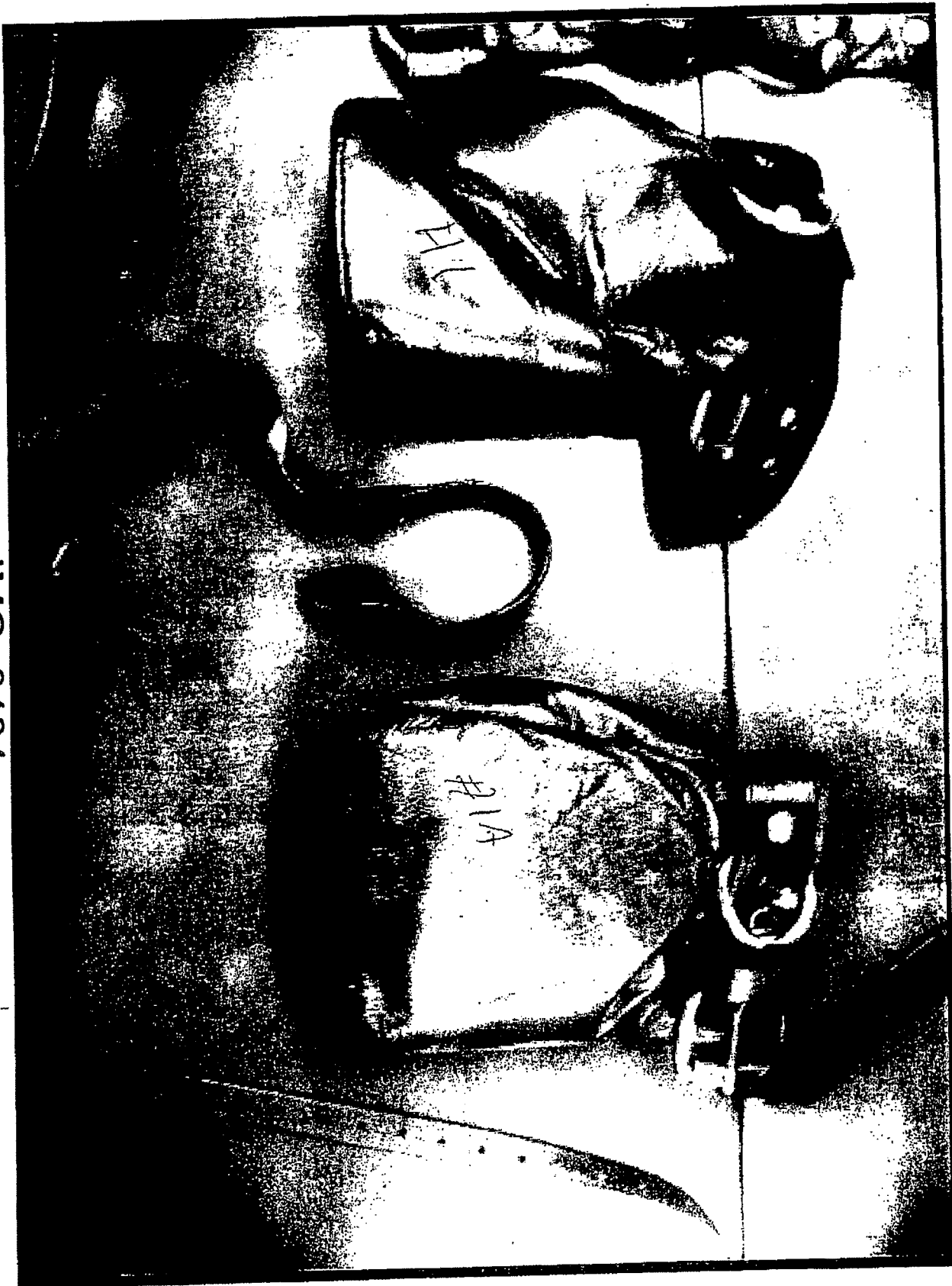
IMG_0394



IMG_0397



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IMG_0404



IMG_0405

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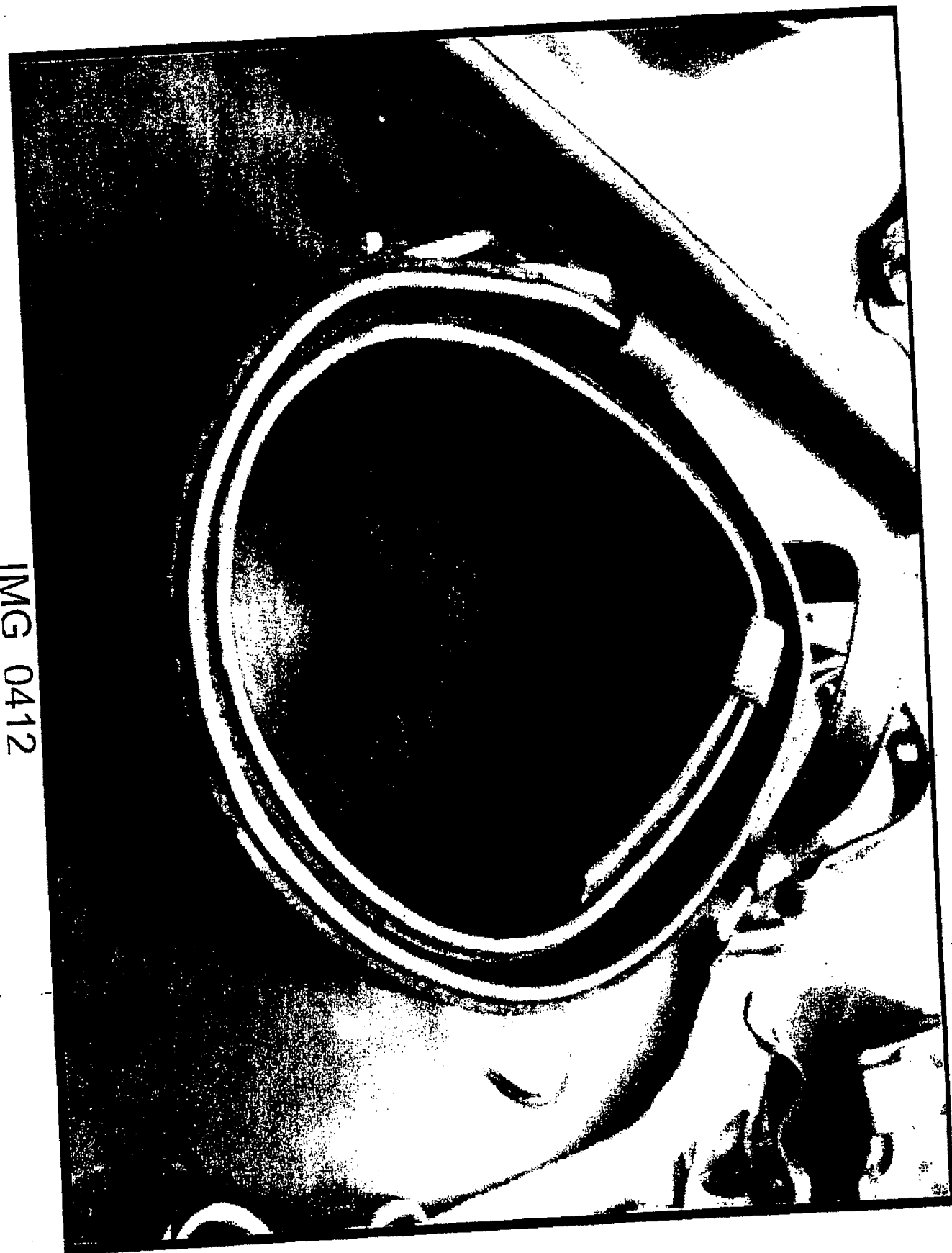


IMG_0409



IMG_0410





IMG 0412

IMG_0414



IMG_0429

