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January 29, 2020

SENT VIA EMAIL

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Assistant United States Attorneys
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007

**Re: State of NY v Michael Thomas, et al.
Docket No.: 1:19-cr-00830
Discovery Request**

Dear Ms. ██████████:

As previously discussed, I am making a formal request pursuant to Rule 16(a)(1)(C) for any and all reports, memorandums, written statements, photos, videos, and incident reports created, manufactured or possessed by the United States Inspector General.

Please see *U.S. v. Bryan*, 868 F.2d 1032 (1989) if you maintain that Mr. Thomas is not entitled to the requested documents.

Respectfully yours,

/s/ Montell Figgins
Montell Figgins, Esq.
Attorney for Defendant Michael Thomas

cc: Jason Erroy Foy, Esq, *Counsel for Defendant Noel via ECF*