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Attorney for Defendant Santilli

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PETER SANTILLI,

Defendant.

Case No. 3:16-cr-00051-BR

**DEFENDANT PETER SANTILLI'S
REQUEST FOR PRETRIAL
DISCOVERY**

Defendant Peter Santilli, through his attorney Thomas K. Coan, hereby joins in the discovery request filed by defendant Joseph O'Shaughnessy. [Doc 180]

In addition to the information identified in defendant O'Shaughnessy's request, Santilli specifically requests the following documents and information:

1. All documents and information relating to orders or requests any law enforcement officer made to Santilli asking or directing him to change his broadcasts in any way from April 1, 2014 through January 26, 2016.

2. All documents and information relating to any notice from law enforcement officers to Santilli from April 1, 2014 through January 26, 2016 that his broadcasts were considered to be unlawful in any way.

3. All documents and information showing whether Santilli is or was on the terror watch list anytime from January 2013 to the present, and, if his name was on the terror watch list, all documents showing why it was so placed there.

4. All documents and information showing whether Santilli acted as an informant for the FBI or any other federal law enforcement agency from January 2011 to the present.

5. All documents and information showing any efforts the FBI or any other federal law enforcement agency took to investigate the false information published on the Internet from January 2014 to the present claiming that Santilli had worked as an FBI informant.

6. All documents and information showing communications from or by any federal law enforcement agent relating to or naming Santilli from January 2013 to the present, including but not limited to any email or text communications.

7. All documents and information showing or relating to any communications naming or relating to Pete Santilli, sent to or from BLM Special Agent Daniel P. Love and/or FBI Special Agent Gregory Bretzing, including but not limited to all email and text communications naming or relating to Santilli, from January 2014 to the present.

8. All documents showing whether the FBI or any other law enforcement agency has or had super administrator privileges or back-door administrative privileges with The PeteSantilliShow.com, Guerilla Media Network, Santilli's YouTube channel, or

other Internet sites through which Santilli publishes content such as Spreaker or Facebook, from January 2013 through the present.

9. All notes, reports or other documents relating to federal law enforcement officer(s) watching Santilli online, his live streaming video productions, or *The Pete Santilli Show*, from March 2014 to the present, including the names of any officers watching Santilli, the date the officer watched Santilli, the show episode number and any notes or reports generated from watching him or his show.

DATED this 1st day of March 2016.

Thomas K. Coan
Thomas K. Coan, OSB 89173
Attorney for Defendant