UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	**CASE NO. 21-cr-244 (CKK)**
v.	:	
	:	
ANTHONY ALFRED GRIFFITH, SR.,	:	
	:	
Defendant.	:	

GOVERNMENT'S OPPOSITION TO
DEFENDANT'S MOTION TO SUPPRESS STATEMENTS

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully opposes the defendant's Motion to Suppress Statements and Evidence. Because the defendant knowingly and voluntarily waived his right to remain silent under *Miranda v. Arizona*, 384 U.S. 436 (1966), the defendant's motion should be denied.

PROCEDURAL BACKGROUND

On March 4, 2021, Anthony Alfred Griffith, Sr. ("Griffith" and the "defendant") was arrested pursuant to a federal arrest on the following charges: one count of entering and remaining in a restricted building or grounds, in violation of 18 U.S.C. § 1752(a)(1); one count of disorderly and disruptive conduct in a restricted building or grounds, in violation of 18 U.S.C. § 1752(a)(2); one count of disorderly conduct in a Capitol building, in violation of 40 U.S.C. § 5104(e)(2)(D); and one count of parading, demonstrating, or picketing in a Capitol building, in violation of 40 U.S.C. § 5104(e)(2)(G). Dkt. 6. A federal grand jury subsequently indicted on those same charges on March 24, 2021. Dkt. 12.

On November 28, 2023, the defendant filed his Motion to Suppress Statements and Evidence (hereinafter "the defendant's motion"). Dkt. 96. In his motion, the defendant seeks to suppress statements he made to law enforcement officers on March 4, 2021, the date of his arrest.

Mot. 1-3. The defendant's motion does not seek to suppress any physical evidence seized during defendant's arrest or the search of his residence, nor does it seek to suppress statements Griffith made to law enforcement on January 15, 2021.

The government hereby opposes defendant's motion.

FACTUAL BACKGROUND[1]

On January 6, 2021, the defendant unlawfully entered the grounds of the U.S. Capitol during the riot taking place while the Joint Session of Congress attempted to certify the results of the 2020 Presidential Election. While on the grounds, the defendant twice entered into the U.S. Capitol building itself, walked about, and took photographs.

On March 4, 2021, at approximately 6:30 a.m., Special Agents and Task Force Officers from the Federal Bureau of Investigation ("FBI"), including Special Agent Jeffrey Gardner and Special Agent Susan Ellis, executed the arrest warrant for the defendant as he parked his vehicle near the St. Francis Hospital in Muskogee, Oklahoma. *See generally* FD-302 Serial 22 (March 12, 2021, attached hereto as Exhibit 1). Griffith was detained by the arresting officers as he exited his vehicle and was searched incident to arrest. His cellular telephone was seized. Griffith was immediately placed in an FBI vehicle with his hands handcuffed behind him for transport to his residence in coordination with execution a federal search warrant there. *Id.* at 1; *see also* FD-302 Serial 23 (March 12, 2021, attached hereto as Exhibit 2). The FBI vehicle was unmarked. The only time Special Agent Gardner touched Griffith was to handcuff him.

[1] This factual summary is being provided only as background information to aid the Court in considering the defendant's motion at issue and the government's response in this pleading. It is not a complete description of all the facts and evidence that might be established and admitted at a hearing on the defendant's motion or at trial. This factual description is a summary only, not a complete description of all the details of the encounter and the statements made therein.

At that time (approximately 6:30 a.m.), Special Agent Gardner advised Griffith of his *Miranda* rights by reading to him from an Advice of Rights form. *See* FD-395 dated March 4, 2021 (attached hereto as Exhibit 3). That form states in bold letters "FEDERAL BUREAU OF INVESTIGATION ADVICE OF RIGHTS" across the top. Just below the title, the pre-printed form has spaces for "Place," "Date," and "Time," in which is handwritten "Muskogee, OK," "3/4/2021," and "6:30 a.m.," respectively. The form then enumerates, in bullet point fashion, the rights afforded to the defendant. *Id.* The defendant was unable to sign the consent line because his hands were handcuffed behind his back, but he agreed without hesitation to answer questions during the drive from the hospital parking lot to the defendant's residence. There was no indication that Griffith was unwilling or unable to speak with law enforcement. Special Agent Gardner signed the witness section.[2] *Id.*

After Special Agent Gardner advised defendant of his *Miranda* rights, there was a brief delay while the Special Agents arranged for Griffith's friend to take custody of defendant's vehicle and while investigators communicated with the search team at Griffith's residence. At approximately 6:38 a.m., Special Agents Gardner and Ellis began driving Griffith back to his residence. Special Agent Gardner was armed; his gun holstered throughout the interview but may have been visible to the defendant. The Special Agents identified themselves to Griffith and explained the nature of the interview to him. Exhibit 2. Griffith remained cooperative throughout and demonstrated no difficulty communicating with Special Agent Gardner or reluctance in

[2] As described below, Special Agent Gardner re-advised defendant of his *Miranda* rights at approximately 7:57 a.m. (roughly 90 minutes later) and then added the handwritten note at the bottom of Exhibit 3 explaining why the defendant had not previously signed that Advice of Rights Form: "Subject was handcuffed behind his back when mirandized at this time and was unable to signed [sic]. Subject was remirandized prior to recorded interview. See attached FD-395." Special Agent Gardner signed his handwritten annotation with his initials ("JG").

answering his questions. During the drive, Griffith attempted to contact his wife in order to have her meet the Special Agents at the door.

En route to his residence, Griffith told Special Agent Gardner that he had traveled from Ft. Gibson, Oklahoma, to Washington, D.C., to attend the January 6, 2021, rally in support of then-President Donald Trump. Exhibit 2. He stated that he was motivated in part by religious feelings, and had not traveled to Washington, D.C., with the intent to enter or visit the Capitol but was part of a group that migrated to the Capitol after the rally. He told the Special Agents that he followed the crowd into the Capitol and described his presence there as, "spiritual." The defendant estimated he spent approximately 15-20 minutes inside of the Capitol. Griffith acknowledged taking photographs while inside of the Capitol Building but told investigators that he lost his cellphone between the time he was in the U.S. Capitol and his return to Oklahoma. That interview was not recorded, but Special Agent Gardner based his questions on a previously prepared outline and took contemporaneous handwritten notes (both attached hereto as Exhibit 4).

Griffith and the Special Agents arrived at Griffith's residence at approximately 7:13 a.m. Once there, Griffith exited the vehicle and was allowed to enter his residence and to speak with his wife. Griffith sought to assist agents in looking for specific items of clothing and remained polite and cordial throughout. During that time, Griffith complained of shoulder pain and so investigators re-handcuffed him with his hands in the front in order to make him more comfortable. One of the agents offered Griffith a donut.

While the search of Griffith's residence was proceeding, Special Agent Gardner, Special Agent Ellis, and the defendant returned to the FBI vehicle previously used to transport Griffith (parked in Griffith's driveway) and conducted a recorded interview. At the outset of that second, recorded interview (attached hereto as Exhibit 5), Special Agent Ellis explained to the defendant

that they would again read to him the same advisement of rights that they had read to him upon his arrest at 6:30 a.m. in Muskogee that morning, stating in sum and substance:

> Mr. Griffith, I have a here a Advice of Rights form that you signed, that we executed earlier, uh, upon your arrest in Muskogee at about 6:30. We're going to go ahead and just do, since we're now in Ft. Gibson, we're just going to go ahead and just read these again, and then if you can just Jeff have him sign that after we, after we read, you can go ahead and just read him the rights again and then we'll sign that one and date it, and with the time, now that we're doing it again.

Exhibit 5 (37 seconds to 63 seconds). At that time, Griffith did not in any way contest or dispute Special Agent Ellis's description of the earlier advisement of rights that occurred earlier that morning upon his arrest at 6:30 a.m. Special Agent Gardner then proceeded to re-read the rights to Griffith again, verbatim, from a second FD-395 form (attached hereto as Exhibit 6):

> Before we ask you any questions, you must understand your rights. You have the right to remain silent. Anything you say can be used against you in court. You have the right to talk to a lawyer for advice before we ask you any questions. You have the right to have a lawyer with you during the questioning. If you cannot afford a lawyer, one will be appointed for you before any questioning if you wish. If you decide to answer questions now without a lawyer present, you have the right to stop answering at any time.

Exhibit 5 (63 seconds to 89 seconds). Upon completing the recitation of rights again, Special Agent Gardner asked Griffith whether he understood those rights; Griffith said "yes." Special Agent Gardner then asked Griffith to read the Consent statement from Exhibit 6 out loud. Griffith did so, stating "I have read this statement of my rights and I understand what my rights are. At this time, I am willing to answer questions without a lawyer present." Griffith then signed below that Consent statement. The Special Agents then signed as witnesses and put in the approximate time (7:57 a.m.).

In their subsequent recorded conversation, Special Agent Ellis explained that they would attempt to go back over their earlier conversation, and asked Griffith (in sum and substance) to "let us know if you have any questions or if I say something that is not accurate with some of the

stuff we spoke about on the way here." Special Agent Gardner went through his handwritten notes (taken during the earlier, unrecorded conversation) with Griffith, and he and Special Agent Ellis asked Griffith to confirm parts of that earlier conversation. That interview lasted approximately twenty minutes. Throughout that interview, as evidenced by Exhibit 6, the defendant never once requested a lawyer or invoked his right to remain silent. The agents and the defendant spoke calmly, politely, and respectfully throughout the entirety of their conversation.

At its conclusion, at roughly 8:20 a.m., Special Agents Gardner and Ellis transported the defendant to the United States Marshal Service Detention Center in Muskogee for processing.

LEGAL STANDARD

The Fifth Amendment provides that "[n]o person . . . shall be compelled in any criminal case to be a witness against himself." U.S. Const. Amend. V. To safeguard that right, the police must warn a suspect who is going to be questioned while in custody that he "has the right to remain silent, that anything he says can be used against him in a court of law, that he has the right to the presence of an attorney, and that if he cannot afford an attorney one will be appointed for him prior to any questioning if he so desires." *Miranda v. Arizona*, 384 U.S. 436, 479 (1966). While Fourth Amendment waivers need only be voluntary, *Schneckloth v. Bustamonte*, 412 U.S. 218 (1973), a Miranda waiver must be both intelligent and voluntary. *Miranda,* at 471-72.

These rights need not be word for word from the *Miranda* ruling. Substance, not form, is the test. See, e.g., *Florida v. Powell*, 559 U.S. 50, 64, (2010) ("We decline to declare its precise formulation necessary to meet *Miranda*'s requirements. Different words were used in the advice [the defendant] received, but they communicated the same essential message."); *Duckworth v. Eagan*, 492 U.S. 195, 202 (1989) ("We have never insisted that Miranda warnings be given in the exact form described in that decision."); *California v. Prysock*, 453 U.S. 355, 359, (1981) ("*Miranda* itself indicated that no talismanic incantation was required to satisfy its strictures.").

A suspect who wishes to invoke his rights must do so unambiguously. *See Berghuis v. Thompkins*, 560 U.S. 370, 381 (2010) ("There is good reason to require an accused who wants to invoke his or her right to remain silent to do so unambiguously."); *Davis v. United States*, 512 U.S. 452, 461-62 (1994) ("If the suspect's statement is not an unambiguous or unequivocal request for counsel, the officers have no obligation to stop questioning him."). This requirement "results in an objective inquiry that avoids difficulties of proof and provides guidance to officers on how to proceed in the face of ambiguity." *Berghuis*, 560 U.S. at 381. Where a suspect says something ambiguous or equivocal, it is not only permissible but often "good police practice" to clarify whether he wants to invoke his rights. *Davis*, 512 U.S. at 461; *accord Berghuis*, 560 U.S. at 381. Where the suspect decides to talk, his statements may be admitted without violating the Fifth Amendment if the government shows by a preponderance of evidence that he knowingly, intelligently, and voluntarily waived his rights. *See Colorado v. Connelly*, 479 U.S. 157, 168-69 (1986).

The Supreme Court has indicated that the inquiry into whether a statement is obtained voluntarily should be determined with reference to the totality of the circumstances. In determining whether a defendant's will was overborne in a particular case, the Court has "assessed the totality of all the surrounding circumstances—both the characteristics of the accused and the details of the interrogation." *Bustamonte*, 412 U.S. at 226. The ultimate question is whether the suspect's "will [has been] overborne" by "coercive police activity." *Colorado v. Connelly*, 479 U.S. 157, 167, 178 n.2 (1986). If there is no coercive police activity, a statement is considered voluntary. *Connelly*, 479 U.S. at 167; *Baird v. United States*, 851 F.2d 376, 382 (D.C. Cir. 1988). *Compare United States v. Hallford*, 816 F.3d 850, 856 (D.C. Cir. 2016) (no coercive police conduct where defendant agreed to an interview with agents, agents asked "straightforward" questions in "conversational

tones"; defendant was not restrained; interview lasted less than an hour; defendant questioned in a hospital and not in a police-dominated atmosphere; defendant was not tricked into answering questions; defendant's refusal to consent to a search of his vehicle showed his will was not overborne), *with Little v. United States*, 125 A.3d 1119, 1133 (D.C. 2015) (defendant chained to the ground and chair, denied counsel when requested, threatened that he would be raped if he went to jail, and accused of crimes officers knew he did not commit, was coerced into confessing).

ARGUMENT

The defendant argues that the defendant's statements were taken in violation of his Fifth Amendment rights and in violation of *Miranda* and its progeny. His claims lack merit for the reasons described below, and his motion should be denied.

I. The Defendant was Given Valid *Miranda* Warnings by the FBI Agents Prior to Any Custodial Interrogation.

The agents gave warnings almost identical to the language from Miranda immediately upon his arrest on March 4, 2021, at 6:30 a.m. The Miranda decision states that "[p]rior to any questioning, the person must be warned that he has a right to remain silent, that any statement he does make may be used as evidence against him, and that he has a right to the presence of an attorney, either retained or appointed." *Miranda*, 384 U.S. at 444. Special Agent Gardner scrupulously observed Griffith's *Miranda* rights. He first read the defendant the following warnings from the FD-395 form upon his arrest at 6:30 a.m. in Muskogee:

> Before we ask you any questions, you must understand your rights. You have the right to remain silent. Anything you say can be used against you in court. You have the right to talk to a lawyer for advice before we ask you any questions. You have the right to have a lawyer with you during the questioning. If you cannot afford a lawyer, one will be appointed for you before any questioning if you wish. If you decide to answer questions now without a lawyer present, you have the right to stop answering at any time.

Exhibit 3. The custodial interview began after Griffith received his Miranda warnings,

approximately eight minutes later during the drive from his place of work to his residence.

Ninety minutes later, Special Agent Gardner read precisely the same warnings to Griffith once again and prior to re-commencing the custodial interview. Exhibit 5 and Exhibit 6. Griffith then read the consent statement aloud and signed the consent form. *Id.* Both the agent's oral recitation of the rights and the written documents provided to the defendant were nearly verbatim from *Miranda*. Therefore, those warnings, and Griffith's subsequent statements to the FBI, were legally sound under *Miranda* and its progeny.

In his motion, Griffith claims that he was not given his *Miranda* warning prior to the interview that occurred on the trip from Muskogee and his residence. Mot. at 1 ("This trip from Muskogee to his house was from 6:38 am to 7:13 am. He was not mirandized."). He is wrong. As described above, Special Agent Gardner read Griffith his *Miranda* rights from a written form at approximately 6:30 a.m., immediately after his arrest and prior to the interview which occurred during the drive from Muskogee to Griffith's residence (from 6:38 a.m. to 7:13 a.m.). Exhibits 1, 2, and 3. While that advisement of rights was not audio recorded, a second advisement at 7:57 a.m. *was*—and that recording demonstrated beyond cavil that the 7:57 a.m. advisement of rights repeated the earlier advisement of rights executed at 6:30 a.m. when Griffith was arrested (and thus prior to any custodial statements). Indeed, after hearing Special Agent Ellis describe the second advisement of rights as repeating what he had already agreed to, Griffith offered no disagreement and expressed no confusion about what she was describing. Indeed, Special Agent Ellis specifically invited Griffith to "let us know if you have any questions or if I say something that is not accurate with some of the stuff we spoke about on the way here," Exhibit 5, and Griffith offered nothing by way of questioning or correcting her statements regarding the earlier advisement of rights. On March 4, 2021, at least, Griffith recognized that

the Special Agents had advised him of his *Miranda* rights before his conversation with them on the drive to his residence.

II. The Defendant's Waiver Was Voluntary, Knowing and Intelligent, and Was Never Revoked During the Custodial Interview.

The procedural safeguards in place after *Miranda* require that not only that the defendant receive proper warnings about his rights, but that "after such warnings have been given, and such opportunity afforded him, the individual may knowingly and intelligently waive these rights and agree to answer questions or make a statement." *Miranda,* 384 U.S. at 479. "The waiver inquiry has two distinct dimensions: waiver must be 'voluntary in the sense that it was the product of a free and deliberate choice rather than intimidation, coercion, or deception,' and 'made with a full awareness of both the nature of the right being abandoned and the consequences of the decision to abandon it.'" *Berghuis*, 560 U.S. at 382–83 (quoting *Moran v. Burbine*, 475 U.S. 412, 421 (1986)).

A review of the defendant's behavior during the recorded interview makes plain that his waiver was voluntary, knowing, and intelligent. At the time of his arrest, the defendant was a 56 year-old man who had been a practicing electrical contractor for over thirty years and a small business owner who mentored other electricians. The defendant understood the rights read to him, as evidenced by the fact that he affirmatively read aloud the consent language in the Advisement of Rights form ("I have read this statement of my rights and I understand what my rights are. At this time, I am willing to answer questions without a lawyer present.") when Special Agent Gardner finished reading him his rights, and that he signed the document containing the written warnings. Exhibit 6. The defense does not allege any mental illness, language barrier, or other defect that would have made it difficult for the defendant to understand the warnings given to him and waive the rights therein intelligently, and certainly none are evident from the recorded

interview. Exhibit 5. Barring such evidence, the statements made subsequent to a valid waiver, after both oral and written *Miranda* warnings were given, should be admissible.

Additionally, at no point during the defendant's interview did he refuse to give a statement, invoke his right to remain silent, or ask to speak with a lawyer. It is also notable that throughout the recorded interview, the defendant routinely spoke at length, with little prodding from the agents, and volunteered additional information—a strong indication of the voluntariness of his statements and his willingness to continue. As such, the defendant knowingly, intelligently, and voluntarily waived his rights under *Miranda* and his statements should be admitted.

III. The Agents Did Not Perform an Impermissible "Two-Step" Interrogation By Speaking to the Defendant Before the *Miranda* Warnings.

Contrary to the defendant's claim that the agents gave an impermissible "question first" recitation of the *Miranda* warnings, the agents gave the defendant his *Miranda* warnings first, immediately after they arrested the defendant and before any substantive questioning had begun. The defendant's reliance on the plurality opinion in *Missouri v. Seibert*, 542 U.S. 600 (2004) is inapposite, particularly when viewed in light of this jurisdiction's case law after *Seibert* and the facts of this case.

The plurality and concurrence opinions in *Seibert* are primarily concerned with a "question-first, warn-second" tactic that could be coercive. *Id.* at 604. Two tests emerge from the *Seibert* decision: the plurality approach, which focuses on the effectiveness of the warnings, (*id.* at 611-612) and Justice Kennedy's approach, which focuses on the intent of the interrogating officer (*id.* at 621). Though the D.C. Circuit has not opined on which test it may apply, see *United States v. Straker*, 800 F.3d 570, 617 (D.C. Cir. 2015) ("We need not pick sides in that debate"), it is clear that the totality of the circumstances must be considered to determine if "the manifest purpose behind such a tactic is to 'get a confession the suspect would not make if he understood

his rights at the outset.'" *United States v. Hitselberger*, 991 F. Supp. 2d 130, 141 (D.D.C. 2014) (citing *Seibert*, at 613). No tactic is *per se* unconstitutional, *id.* at 141, and indeed, several cases in this District have rejected arguments that *Miranda* warnings given "midstream" were ineffective or warranted suppression. See, e.g., *Hitselberger*, at 134 (holding there was no impermissible two-step interrogation where, in the 38 minute conversation before *Miranda* warnings were given, the agents did not ask the defendant any questions about the precipitating incident.); *United States v. Apodaca*, 275 F. Supp. 3d 123, 146 (D.D.C. 2017) (holding no violation of defendant's rights when, six minutes into the conversation, the defendant was given the advice of rights form and there was no questioning of the defendant before he had reviewed the form.); *United States v. Abu Khatallah*, 275 F. Supp. 3d 32, 64 (D.D.C. 2017) (holding that, regardless of which *Seibert* test is applied, a two-day break between the two sets of interviews and clearly distinct subject matters does not create an impermissibly coercive interview.)

In any event, this case is factually distinct from *Seibert* in several ways. First, the officer interrogating the defendant in *Seibert* was following explicit instruction to refrain from giving *Miranda* warnings. *Seibert*, at 604. No such allegation can be made here, especially given the swiftness with which the agents gave *Miranda* warnings at the time of Griffith's arrest and their insistence on providing *Miranda* warnings a second time just ninety minutes later. Second, the officer in *Seibert* questioned the defendant for 30 to 40 minutes before warnings were given. *Seibert*, at 604. Here, the agents gave warnings prior to both interviews – both of which only lasted approximately twenty minutes each. Third, the officer in *Seibert* squeezed the defendant's arm and repeated "Donald was also to die in his sleep," a statement directed at the heart of the criminal case against the defendant. *Seibert*, at 605. Here, the agents never touched Griffith (other than to handcuff him). Finally, unlike in *Seibert*, the defendant did not give any inculpatory

statements before the warnings were given. *See* Exhibit 2 ("*After* being advised of his rights . . . Griffith provided the following information) (emphasis added). Accordingly, there was no basis for defendant to feel that the "cat was out of the bag" necessitating waiver of his *Miranda* rights. *Oregon v. Elstad*, 470 U.S. 298, 311(1985) (rejecting the "cat out of the bag" theory when voluntary unwarned admissions were made and proscribed official coercion played no part in either the warned or unwarned confessions).

IV. The Defendant's Statements Were Voluntary, Not Coerced, and Should be Admissible at Trial.

The defendant's argument that his confession was involuntary is neither factually accurate nor legally sound. When reviewing voluntariness and possible coercion, the Court must look to the totality of circumstances, including both the characteristics of the accused and the details of the interrogation. *Bustamonte*, 412 U.S. at 226. The Supreme Court has held that the ultimate question is whether the suspect's "will [has been] overborne" by "coercive police activity." *Colorado v. Connelly*, 479 U.S. 157, 167, 178 n.2 (1986). If there is no coercive police activity, a statement is considered voluntary. *Connelly*, 479 U.S. at 167; *Baird v. United States*, 851 F.2d 376, 382 (D.C. Cir. 1988). If a suspect gives a statement solely as a result of an internal condition, e.g., insanity or intoxication, there also is no constitutional violation. *Connelly*, 479 U.S. at 167. It has long been the rule that the mere fact that an accused is in custody and subjected to police questioning is not sufficient to raise a voluntariness issue. *United States v. Bernett*, 495 F.2d 943, 956 (D.C. Cir. 1974). Rather, something besides custody and ordinary questioning must come into play. *Id.*

Here, the defendant insists that he "raises a colorable claim of coercion" but offers nothing in support of his assertion. Mot. 3. Defendant fails to point to anything coercive in Griffith's recorded statement, and for the reasons described above, his claim that agents questioned him

before advising him of his *Miranda* rights fails. At Griffith's request, the Special Agents released his vehicle to his designee almost immediately after his arrest. The initial interview occurred while driving from Griffith's work to his residence, not in a police station, and the agents allowed Griffith to attempt to call his wife on the way there. Upon arrival at his residence, Griffith was allowed to enter his home and to cooperate in the search for items responsive to the search warrant. The second interview occurred entirely in a vehicle parked in Griffith's own driveway, and as the recording makes plain, the entirety of the interview was professional, cordial, and friendly. One of the agents acknowledged appreciation for Griffith's cooperation, and specifically asked Griffith to correct any misstatements by the agents. At no point did the defendant ask to end the questioning. Because the statements were voluntary and not the result of coercive police tactics, they should not be suppressed.

//

//

//

//

//

//

//

//

//

//

//

//

CONCLUSION

WHEREFORE, for the reasons stated above and for any other reason presented at the hearing or in the record, the United States respectfully requests that the defendant's Motion to Suppress be DENIED.

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

By: /s/ Craig Estes
CRAIG ESTES
Assistant United States Attorney
United States Attorney's Office for the
Massachusetts (detailed to USAO-DC)
Massachusetts Bar No. 670370
craig.estes@usdoj.gov
(617) 748-3100

/s/ Sonia Mittal
SONIA MITTAL
Assistant United States Attorney
United States Attorney's Office for the
District of Columbia
Illinois Bar No. 6314706
sonia.mittal@usdoj.gov
(202) 821-9470