

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :  
 :  
 v. : Case No. 21-cr-175-4 (TJK)  
 :  
 CHARLES DONOHOE, :  
 :  
 Defendant : :

**GOVERNMENT’S NOTICE OF EVIDENCE REFERENCED DURING HEARING**

The United States hereby gives notice that, in connection with the detention hearings before Magistrate Judge G. Michael Harvey on April 19 and 22, 2021, and Judge Timothy J. Kelly on June 23, 2021, the government provided to the Court and counsel for defendant Charles Donohoe a PowerPoint file identified as “2021.04.16\_Donohoe Detention.pptx” along with three video exhibits identified as “Exhibit A – Let’s take the Capitol” and “Exhibit B\_Donohoe with shield” and “Exhibit C\_Donohoe Stairs.” The government also provided the Court with certain text messages, which are described in more detail in a separate filing at ECF 110.

The government files herewith a PDF copy of the PowerPoint file previously provided to the Court and defense counsel. The PowerPoint file (in original format) contains excerpts of three video files at pages 5, 9, and 10. Such video files are the same video files submitted separately to the Court as Exhibits A – C in the first paragraph of this notice. The government has previously made available Exhibits A – C in accordance with the procedure established by the Chief Judge. See Standing Order 21-28 (BAH), at 6.

The images on page 6 of the PowerPoint are screenshots and not a video file. The government has maintained possession of the video and audio files pursuant to Local Rule 49(e)(1).

For the record, the government does not object to the release of the above-referenced video files in accordance with the procedure established by the Chief Judge. *See* Standing Order 21-28 (BAH), at 6. Likewise, the government does not object to a request for permission to record, copy, download, retransmit, and otherwise further publish the files.

Respectfully submitted,  
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# U.S. v. Charles Donohoe

## 21-CR-175-4 (TJK)

Detention Hearing Exhibits

April 16, 2021

# Telegram Messages

Following Arrest of Proud Boys Chairman on January 4

From: 586406520 YutYut Cowabunga

Each one of us should personally clear our history of that MOSD chat

1/4/2021 2:21:54 PM(UTC-8)

\*5:21:54 PM Eastern

From: 586406520 YutYut Cowabunga

Well at least they won't get our boots on ground plans because we are one step ahead of them

1/4/2021 2:31:54 PM(UTC-8)

# Telegram Messages

Following Arrest of Proud Boys Chairman on January 4

From: 586406520 YutYut Cowabunga

Hey have been instructed and listen to me real good! There is no planning of any sorts. I need to be put into whatever new thing is created. Everything is compromised and we can be looking at Gang charges

1/4/2021 4:16:48 PM(UTC-8)

\*7:16:48 PM Eastern

From: 586406520 YutYut Cowabunga

Stop everything immediately.

1/4/2021 4:16:48 PM(UTC-8)

From: 586406520 YutYut Cowabunga

This comes from the top

1/4/2021 4:16:48 PM(UTC-8)

# Telegram Messages

Morning of January 6 (7:18 a.m. – 7:26 a.m.)

DONOHOE: Are you here?

...

UCC-1: No I started a new job, don't want to fuck it up yet

DONOHOE: Well fuck man

UCC-1: There will be plenty more I'm sure lol

UCC-1: I want to see thousands of normies burn that city to ash today

Person-2: Would be epic

UCC-1: The state is the enemy of the people

Person-2: We are the people

UCC-1: Fuck yea

Person-3: God let it happen . . . I will settle with seeing them smash some pigs to dust

Person-2: Fuck these commie traitors

Person-3: It's going to happen. These normiecons have no adrenaline control . . . They are like a pack of wild dogs

DONOHOE: I'm leaving with a crew of about 15 at 0830 to hoof it to the monument no colors

Person-2: Fuck it let them loose

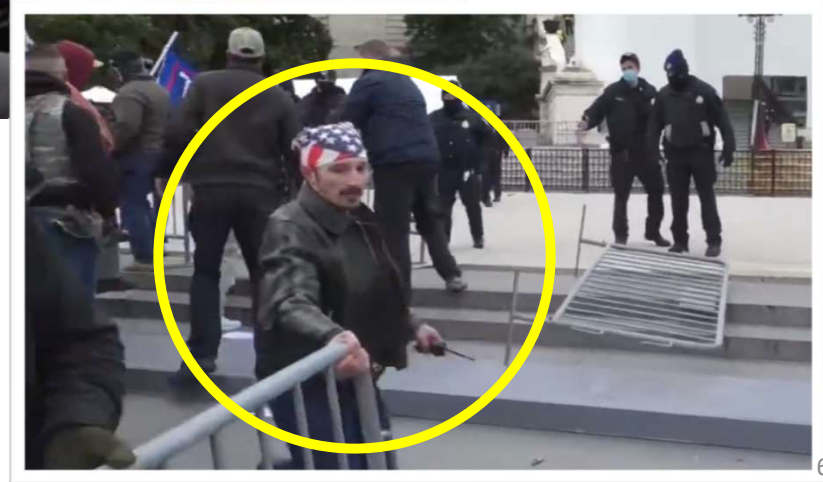
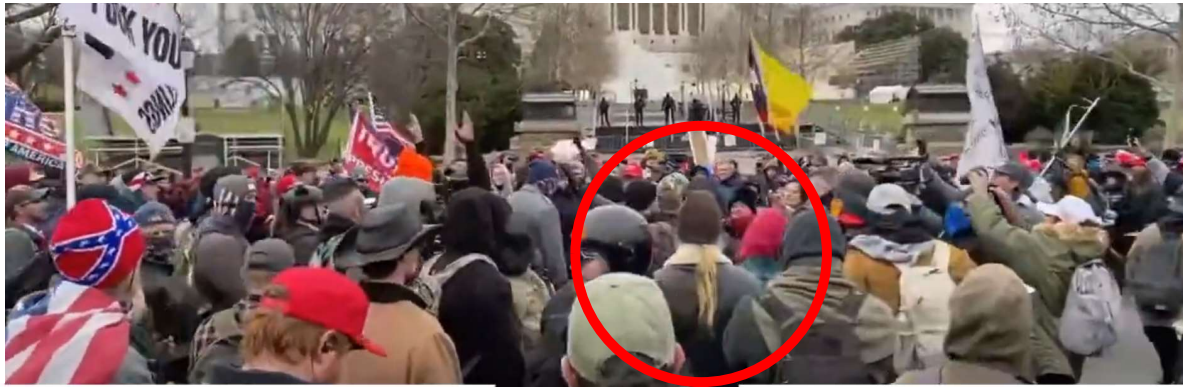
Person-3: I agree . . . They went too far when the [sic] arrested Henry as a scare tactic

**East Side of Capitol**

**"Let's Take the Fucking Capitol"**

# West Side of Capitol

## Breach of Pedestrian Gate



# Telegram Messages

Shortly After 1 p.m. Eastern

**PERSON-2:** Storming the capital  
*1:00pm* building right now!!

**PERSON-2:** Get there  
*1:00pm*

**UCC-1:** Storming the capital  
*1:02pm* building right now!!

Audio of Joe Biggs  
(Re: "Storming" the Capitol)



# Telegram Messages

Shortly After 1 p.m. Eastern

UCC-1: Push inside! Find some eggs and rotten tomatoes!

*1:03pm*

PERSON-2: They deploy the mace yet?

*1:10pm*

DONOHOE: We are trying

*1:11pm*

# Got a riot shield!

Telegram Message at 1:37 p.m.



From: 586406520 YutYut Cowabunga  
Got a riot shield!

1/6/2021 10:37:27 AM(UTC-8)

\*1:37:27 PM Eastern



# Push Toward Terrace

Approximately 2 p.m.

## VIDEO

- *Donohoe circled in red.*
- *“Milkshake” circled in yellow.*



# Telegram Messages

Approximately 4 p.m.

Person-2: I did not see a video of anyone I knew breaking the windows or entering the building

REHL: Nah it was just pissed off normies, once we showed up and started chanting shit, everyone went nuts and that was that

DONOHOE: Def a video of one of our guys smashing out the window with a stolen police riot shield

# Telegram Messages

Approximately 7 p.m.

REHL: Ah shit forgot you [Biggs] had to roll, was hoping to have some celebratory beers with yall after this epic fuckin day, I'll drink one for ya

BIGGS: We will one day. This day lives in infamy or [sic] the ages

DONOHOE: Yeah I feel like a complete warrior. . . .I stood on that front line the entire time and pushed it twice . . . Thank God we were not wearing colors . . . We should never wear colors ever again for any event . . . Only for meetups . . .

***[Approximately 12 Minute Gap with No Messages in Message Thread]***

DONOHOE: Stop right there . . . All of what you said doesn't matter . . . We stormed the capitol unarmed . . . And took it over unarmed . . . The people are fucking done . . . Wait when joe biden tells us we are all criminls [sic]

Person-2: By then it's too late

DONOHOE: No it's not . . . It's never too late ever . . .

Person-3: [Two unrecovered audio files]

DONOHOE: Facial recognition doesn't mean shit when you got 5.56 green tip