

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

CHARLES DONOHOE,

Defendant.

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Case No: 21-CR-175-4 (TJK)

UNITED STATES' OPPOSITION TO DEFENDANT DONOHOE'S
MOTION FOR REVOCATION OF DETENTION ORDER

This Court should deny defendant Charles Donohoe's motion to revoke the detention order issued by United States Magistrate Judge Harvey on April 22, 2021. *See* Det. Hr'g Tr. (ECF 75). Here, as Magistrate Judge Harvey found, all four factors weigh in favor of detention. *Id.* at 7:23-8:3, 26:2-4, 30:4-12, 34:6-13. As established by the evidence outlined herein, the defendant "presents an identified and articulable threat to an individual or the community[.]" *United States v. Munchel*, No. 21-3010 at *16 (D.C. Cir. Mar. 26, 2021), quoting *United States v. Salerno*, 481 U.S. 739, 751 (1987). As Magistrate Judge Harvey found, "Mr. Donohoe has access to and can help marshal a network of individuals who, based on what occurred on January 6th ... would continue to engage in force and violence or aid and abet those who would to promote their political views." ECF 75 at 32:5-10.

Donohoe and his co-defendants were heavily involved in planning, organizing, and leading members of the Proud Boys organization before, during, and after their participation in the January 6 attack. Among other things, Donohoe took steps to ensure operational security in the Telegram message rooms in the wake of the arrest of the Proud Boys Chairman on January 4—issuing warnings and establishing new chat rooms because others had been "compromised." As Magistrate

Judge Harvey observed, Donohoe served in the role of something akin to a “trusted senior lieutenant” who communicated directives from leadership and stood in for leadership when they were absent (e.g., On the morning of January 6, Donohoe declared that he had “the keys” until Nordean and Rehl showed up.). *Id.* at *13:4 – 14, 14:5-20.

And Donohoe played a direct role in the attack on the Capitol grounds. During the melee in the west plaza between 1 – 2 p.m., Donohoe assisted co-conspirator Dominic Pezzola while Pezzola was carrying a stolen police riot shield.¹ Around the same time, Donohoe reported to the Telegram messaging participants, “Got a riot shield.” Shortly thereafter, as Magistrate Judge Harvey observed, Donohoe joined as an “active and willing participant” in the effort to assist the crowd in “overwhelming a very thin line of law enforcement who [were] seeking to block the rioters’ advance onto the West Terrace.” *Id.* at *17:17 – 19. Far from being an unknowing or unwilling participant, Donohoe covered his face before this fateful push *even began*.

After the attack, he celebrated, declaring in Telegram messages that he had “stood on the front line the entire time” and that he had “pushed it twice.” Donohoe explained that January 6 made him “feel like a complete warrior” and he celebrated that “We stormed the capitol unarmed [...] And we took it over unarmed.” These statements in celebration of the accomplishments of the group underscore the danger of a man like Donohoe—a person who had the ability to organize and command a group of men to further a criminal conspiracy. And that planning continued well after January 6, with Donohoe maintaining communications with co-defendant Nordean and others about “bug out bags” that “not only benefit [the individual carrying it] but benefit the team.”

The charges against Donohoe give rise to a rebuttable presumption in favor of detention.

¹ Pezzola has been indicted separately for his role in the January 6 attack. *United States v. Pezzola*, 1:21-cr-52 (D.D.C.).

Pre-trial release would allow the Defendant to remain in the same circumstances in which he and others planned and launched the attack on January 6. For someone who commands influence over a group with a demonstrated desire for violent confrontation, even home detention does little to protect the community. Moreover, the Defendant's repeated efforts to destroy electronic evidence reveal plainly the Defendant's knowledge of his and others' culpability and his intent and efforts to obstruct the due administration of justice in this case. Accordingly, because no condition or combination of conditions will reasonably assure the safety of the community, the government respectfully requests that this Court order the pretrial detention of the Defendant.

Legal Standard

Following the Defendant's arrest, the United States moved for his detention pursuant to 18 U.S.C. § 3142(e)(3)(C), which provides a rebuttable presumption in favor of detention for an enumerated list of crimes, including Destruction of Property in violation of 18 U.S.C. § 1361. The United States also based its request for detention on 18 U.S.C. § 3142(f)(1)(A), because Destruction of Property, in violation of 18 U.S.C. § 1361, is a crime of violence. Moreover, when Destruction of Property is "calculated to influence or affect the conduct of government by intimidation or coercion," it also qualifies as a federal crime of terrorism. See 18 U.S.C. § 2332b(g)(5)(B).

As the Court is aware, there are four factors under Section 3142(g) that the Court must analyze in determining whether to detain the defendant pending trial: (1) the nature and circumstances of the offense charged; (2) the weight of the evidence against the defendant; (3) his history and characteristics; and (4) the nature and seriousness of the danger to any person or the community that would be posed by his release. As Magistrate Judge Harvey found, each of these factors weigh in favor of pretrial detention in this case.

The Defendant's Role in the Offense

On December 29, 2020, the Proud Boys Chairman announced the leadership and structure of a new chapter, which would be called the Ministry of Self-Defense. The leadership and structure included an “upper tier leadership” of six people, which included Proud Boys Chairman, Nordean, and co-defendants Joseph Biggs and Zachary Rehl. Later that evening, Donohoe explained the structure with reference to the upcoming trip to Washington, D.C. Among other things, Donohoe explained that the MOSD was a “special chapter” within the organization. Telegram messages indicate that this “special chapter” was not to have any interaction with other Proud Boys attending the event, and the other Proud Boys attending the event were to coordinate with their own chapters and “do whatever you guys want.” As the Defendant posted:

From: 586406520 YutYut Cowabunga

As of right now...

The DC trip will consist of two groups. None of which can be in colors.

1. The first group of guys have been invited to a special chapter within the organization. If you haven't been invited...please be patient. We are growing the group slowly.

2. The second group consists of PBs that are just attending the event. You can coordinate with other PBs and do whatever you guys want.

Group 1 and group 2 will not have any interaction with each other on the 5th at night and 6th throughout the day. We are running a training exercise at those times.

Group 2 is still expected to conduct themselves as gentlemen and always keep themselves in a self defense mindset at all times.

The way we do national rallies will change drastically over the course of the next couple months. After the 6th you will have to be part of group 1 to attend national events.

12/29/2020 2:44:14 PM(UTC-8)

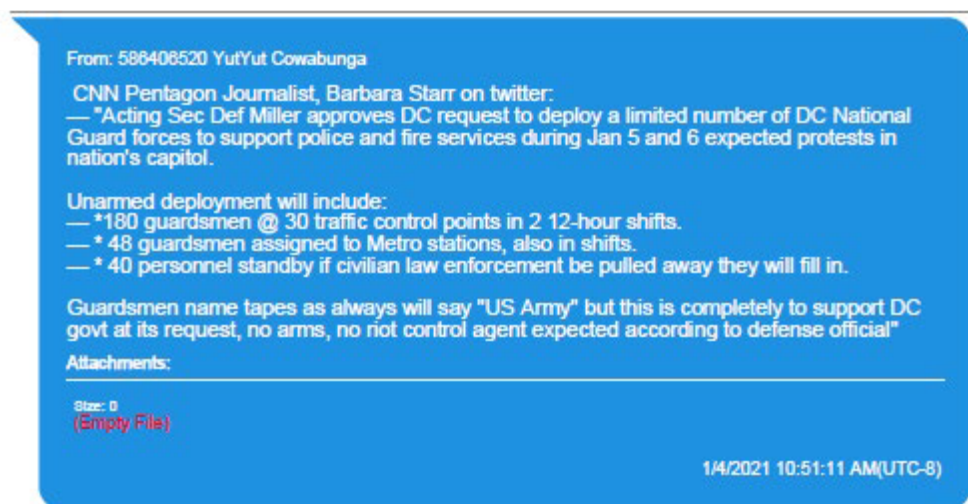
A video call was held with prospective members of the MOSD on December 30, 2020. The self-proclaimed leadership of the MOSD introduced the chapter and explained the expectations, including the strict chain of command. As one member (“Person-1”) of the upper tier leadership explained:

[Directions] could come from any single person that you see on your

screen right now²...but the one thing that everyone has to understand, is, yes, you might be getting told things from different people, but it's all information from the same plan. [Joe] Biggs is not going to tell you something different than I'm gonna tell you. [Proud Boys Chairman] is not going to tell you something different than Zach [Rehl] is going to tell you. It's all one operational plan, so don't get hung up on the delivery. The information is all the same.

The next day, on December 31, 2020, Proud Boys Chairman posted a "list of things to discuss," which indicated that plans for D.C. were "TBD on Jan 2nd evening video call" and that there was "no March" to be planned for the evenings. This focus on January 6 is consistent with Biggs' statement on January 5 that Proud Boys were to "avoid getting into any shit tonight. Tomorrow's the day."

On January 4, 2021, Donohoe reported intelligence about the deployment of a limited number of DC National Guard forces. According to the report identified by Donohoe, there would be "no arms, no riot control agent expected."



Shortly after the arrest of the Proud Boys Chairman on January 4, Donohoe took the initiative to create new Telegram chat groups out of concern that the secrecy of earlier

² Donohoe was visible on the screen at the time the statement was made and was given opportunities to address the group.

communications with the Proud Boys Chairman and others had been compromised because law enforcement had seized the Proud Boys Chairman's phone. Donohoe directed others to leave the earlier chats so that the previous chats could be "nuked." Donohoe subsequently relayed a message that he said was "from the top" in which Donohoe directed: "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[.]"

Planning for January 6 ultimately did resume, and the group was advised that the plans for January 6 would continue. Donohoe used the Telegram messaging groups that he and other leadership had created to communicate plans and directives. Like his co-defendants, he emphasized that there were to be "no colors" worn by the Proud Boys in Washington, D.C. The night before January 6, Donohoe repeated, verbatim, a series of instructions to the members of the Telegram group, referring to co-defendant Nordean by his alias, "Rufio":

Stand by for the shared baofeng channel and shared zello channel, no colors, be decentralized and use good judgement until further orders [. . .] Rufio is in charge, cops are the primary threat, don't get caught by them or BLM, don't get drunk until off the street [. . .]
477.985 freq

Donohoe later repeated a message that advised those attending the rally in D.C. exactly where they were to meet on the morning of January 6. As with others who had posted the message, Donohoe reiterated that the "details" would be "laid out at the pre meeting":

Everyone needs to meet at the Washington Monument at 10am tomorrow morning! Do not be late! Do not wear colors! Details will be laid out at the pre meeting! Come out at as patriot! We will be meeting inside the ropes of the monument on the side facing the whitehouse.

On the morning of January 6, the Defendant arrived early at the agreed-upon meeting location, the Washington Monument. Defendant told others that he "had the keys" until co-defendants Nordean and Rehl arrived. The large group then marched to the east side of the Capitol

building before returning to the west side, where, shortly before 1:00 p.m. they gathered near a pedestrian entrance to the restricted Capitol grounds. Within minutes of arriving at the pedestrian entrance, the crowd overwhelmed law enforcement and trampled the first sets of barriers. Shortly after the initial breach, an unindicted co-conspirator declared on one of the Telegram channels: “Storming the capital [sic] building right now!!” and “Get there[.]”

Indeed, Donohoe advanced past the trampled barriers and into the Capitol’s restricted perimeter. Like his co-defendants, Donohoe made his way to the front of the group and stood opposite the retreating Capitol Police officers. As additional barriers came down, Donohoe and others continued to advance into the west plaza of the Capitol. And Donohoe’s efforts did not stop there—he took direct action to facilitate his co-conspirators’ assault on the building itself.

Shortly after UCC-1 posted a message that directed participants to “push inside!” and another (“Person-2”) asked, “They deploy the mace yet?” Donohoe responded, “We are trying[.]”

From: REDACTED
Push inside! Find some eggs and rotten tomatoes!
1/6/2021 10:03:16 AM(UTC-8)

From: REDACTED
They deploy the mace yet?
1/6/2021 10:10:06 AM(UTC-8)

From: 586406520 YutYut Cowabunga
We are trying
1/6/2021 10:11:08 AM(UTC-8)

Indeed, Donohoe’s subsequent actions would confirm this commitment. Specifically, after Pezzola robbed a Capitol Police officer of his riot shield, Donohoe was captured on video carrying the riot

shield with Pezzola. Around the same time, Donohoe relayed the news to those on the Telegram message group, writing, “Got a riot shield!”



Shortly thereafter, when rioters made a final push up the stairs to reach the Capitol, Donohoe was there. He, along with Proud Boys members and other rioters, took action to overwhelm law enforcement, with the goal of advancing up the stairs to the west terrace of the Capitol building. Tellingly, at the front of the line was the person known as “Milkshake” who earlier in the day had been identified as the Proud Boys member who had encouraged others to “take the fucking Capitol” before being reprimanded for *saying* that.



The crowd’s action ultimately allowed Proud Boys member Pezzola to advance toward the Senate side of the Capitol, where, at approximately 2:13 p.m., Pezzola used the riot shield to break a large window. Pezzola’s action allowed the mob of rioters, including Donohoe’s co-defendants, to enter the Capitol and further obstruct the proceedings inside. Indeed, at 2:19 p.m., a member of the Telegram chats announced, “We just stormed the capital” [sic].

Donohoe’s intent to create mayhem and disrupt the proceedings at the Capitol continued well after the initial breach into the restricted grounds and up to the west terrace. Indeed, at 3:38 p.m., more than an hour after Pezzola and others had broken into the building, Donohoe indicated that he had left the Capitol grounds, but then announced over Telegram, “We are regrouping with a second force.” That plan appears to have been short-lived, as Donohoe subsequently advised the group that the National Guard and “DHS agents” were “incoming.”

After the storming of the Capitol, Donohoe rejoiced, telling his fellow Proud Boys over Telegram, “I stood on that front line the entire time and pushed it twice[.]” He also proudly declared in messages after the attack that such actions made him “feel like a complete warrior.” He celebrated the group’s accomplishments, noting “We stormed the capitol unarmed [...] And we took it over unarmed.”

In the wake of the January 6 attack, as criminal charges against Proud Boys members and others mounted, Donohoe responded as he had when the Proud Boys chairman was arrested—with concern about covering his and others’ tracks. As the creator of several of the Telegram groups that had been used in planning the attack, Donohoe asked others, “Want me to nuke it?” He was directed to do so. About ten minutes later, Donohoe was told, “That didn’t nuke it lol” and then “you gotta nuke it.” A few minutes later, Donohoe wrote, “Hmmm”.

ARGUMENT

1. Nature and Circumstances of the Offenses Charged

The nature and circumstances of the offenses charged in this case strongly support detention. The Defendant is charged by indictment with serious crimes that occurred during an unprecedented attack on the U.S. Capitol that obstructed Congress’s certification of the 2020 U.S. Presidential election. Indeed, the Defendant was heavily involved in the planning and organization of the activities and he took a direct role in leading the group’s efforts to “storm the capitol.” In his motion for reconsideration, the Defendant makes several brief arguments. None of these arguments are new, and none provide a basis to disturb Magistrate Judge Harvey’s decision to detain Donohoe.

a. The Telegram messages reveal a plan to storm the Capitol.

The Defendant claims that a review of the messages fails to uncover anything suggesting a plan to storm the Capitol or otherwise “mention any type of planned violence at the Capitol.” ECF 81 at *5. To the contrary, on January 4, in reacting to news of the possible arrest of Proud Boys Chairman, UCC-1 wrote in an MOSD Telegram message string, “We should tell our guys and double down.” Another member of MOSD leadership (“Person-2”) subsequently wrote, “I say fuck it. Let’s set it off[.]” Person-2 then posted “J20” and then “Drag them out by the fucking hair”

and then “If they steal it[.]” It should be noted that these communications took place between and among the small group of MOSD leadership, which included the defendants and a handful of others.

Consistent with these messages, contemporaneous messages within the Telegram message group reveal that there was a plan to storm the Capitol. First, immediately after the crowd surged unlawfully onto Capitol grounds, a flurry of communications reflect a common understanding of the plan. Person-2 advised participants in the Telegram group that they were “Storming the capital building right now” and then advised them to “Get there.” UCC-1 promptly repeated the message, “Storming the capital building right now” four times. These messages are consistent with contemporaneous statements that were being made on the ground by Milkshake and co-defendant Biggs, who remarked that he and others were, “storming the Capitol.”³

Donohoe understood this plan and confirmed his commitment to it. Minutes after the group’s unlawful entry onto Capitol grounds, UCC-1 posted a message (at 1:03 p.m.) that directed participants to “push inside!” and Person-2 asked, “They deploy the mace yet?” (1:10 p.m.) Donohoe responded, “We are trying” (1:11 p.m.). *See* messages, *supra*, at *7. And when it was over, Donohoe celebrated the *group’s* achievements, noting “We stormed the Capitol unarmed” and “we took it over unarmed.”

Donohoe was not alone in recognizing these efforts as a group achievement. At 2:28 p.m. on January 6, minutes after the Capitol building was breached, a participant in a separate message

³ As narrated by Biggs as he unlawfully advanced toward the Capitol, “Dude, we’re right in front of the Capitol right now. American citizens are *storming the Capitol*—taking it back right now. There’s millions of people out here; this is fucking crazy. Oh my God! This is such history! This is insane. We’ve gone through every barricade thus far. Fuck you!” ECF 46 at *3. A short time later, Biggs gathered for a selfie-style video with co-Defendant Nordean and other Proud Boys. Again, Biggs narrated, “So we just *stormed the fucking Capitol*. Took the motherfucking place back. That was so much fun. January 6 will be a day in infamy.” *Id.* at *4.

string directed a message at the Proud Boys Chairman, writing “I told you we should have rushed the police line on the 12th...This could have been us.” Proud Boys Chairman responded, “This is so much better[.]” Proud Boys Chairman then wrote, “Make no mistake...” and then “We did this...”

Later that evening, a participant in the wider MOSD Telegram messages posted a message in which he stated that those in the group had been making statements about “tak[ing] the Capitol” for “weeks.”

From: **REDACTED**

So many of you have been calling for this for weeks. “Patriots need to storm DC.” “Patriots need to take the Capitol!”

Now it's happening, and the same people are now yelling, “It's Antifa! Patriots wouldn't do this!”

For fuck's sake. Knock off the cognitive dissonance. Now that you're getting what you wanted, you don't have the stomach for the possible consequences and are looking to deflect blame already?

There's a reason I've been saying that discretion is the better part of valor. You either stand by your convictions or you don't.

The mental gymnastics are ridiculous with some of you.

1/6/2021 4:00:53 PM(UTC-8)

b. The Defendant's actions reveal evidence of a plan to storm the Capitol.

The Defendant claims that there is no evidence of him “pushing others forward” or “directing others to go forward.” *Id.* The small fraction of video footage already identified by the government refutes such claims.

To begin, video evidence depicts Donohoe interacting with Pezzola and assisting him in carrying the stolen riot shield. As noted above, Donohoe effectively claims Pezzola's theft as an achievement of the group in declaring over Telegram, “Got a riot shield.” And Donohoe was not simply standing next to Pezzola or touching the shield, but rather, he was walking *in front of* Pezzola while the two were carrying the shield. Such action is consistent with Donohoe's leadership role. It must also be noted that, in the hours after Pezzola's act of breaking the window

of the Capitol hit the airwaves, Donohoe immediately recognized Pezzola as “one of our guys.”⁴

More directly, Donohoe was an “active and willing participant” in the effort to assist the crowd in “overwhelming a very thin line of law enforcement who [were] seeking to block the rioters’ advance onto the West Terrace.” ECF 75 at *17:17 – 19. The video evidence plainly shows Donohoe intently watching the front of the crowd when the Proud Boys member known as Milkshake initiated an altercation with law enforcement. Before the altercation even began, Donohoe had pulled a gaiter up to cover his face. Once the altercation began at the front of the line, Donohoe surged forward to assist the crowd in its efforts to overwhelm law enforcement. As a result of these actions by the crowd, Pezzola advanced up the stairs toward the upper west terrace with the stolen police shield.

Donohoe later bragged about his role in the January 6 riot. Donohoe told the Telegram group that his actions on January 6 made him “feel like a complete warrior.” Donohoe proudly reported that he had stood on the front line and “pushed it twice.” Indeed, the video evidence captures one possible instance of Donohoe’s use of force during a critical moment in law enforcement’s efforts to defend the Capitol.

c. The Defendant remained committed to the effort even after leaving the Capitol.

The Defendant claims that he “attempted to persuade others on the channel to cease their activities.” ECF 81 at *6. As Magistrate Judge Harvey rightly concluded, the purpose of Donohoe’s announcements was to “warn those inside [the Capitol], those still involved in the assault, of incoming law enforcement and security forces.” ECF 75 at 19:15-17. These actions were taken so that participants in the riot could evade arrest. Moreover, such actions are entirely

⁴ Donohoe wrote, “Def a video of one of our guys smashing out the window with a stolen police riot Shield[.]”

consistent with the character of Donohoe’s later attempts to “nuke” the chat messages from which the plans were launched. These comments cut in favor of detention rather than against it.

2. The Weight of the Evidence

The weight of the evidence against the Defendant is strong, and it weighs in favor of pretrial detention. This evidence comes in multiple forms, including the photographs and videos of the Defendant and co-conspirators at the Capitol on January 6, posts and direct messages on social media, and the messages sent and received through Telegram. Together, this evidence paints a clear picture: the Defendant was instrumental in planning and leading the attack on the Capitol by certain members of the Proud Boys. When it came time to act, the Defendant did so without hesitation—advancing past barriers and joining in efforts to breach lines of defense. During and after the attack, the Defendant celebrated his and others’ actions in storming the Capitol. It made Donohoe “feel like a complete warrior.” And, with accountability looming, the Defendant took action to cover his tracks, trying—in vain—to “nuke” the messages by which the plan was launched.

3. The History and Characteristics of the Defendant

The Defendant has served this country as a member of the United States Marine Corps. But the Defendant’s more recent actions—taken against our institutions of government and democracy itself—raise significant concerns that weigh in favor of detention. Critically, the government is unaware of any expression of remorse or contrition by the Defendant or any attempt by the Defendant to distance himself from the violent conduct of those in his command.

To the contrary, even as disturbing images of violence at the Capitol came into public view, Donohoe continued to engage in violent rhetoric. When another member of the Telegram group indicated that it would be “too late” after President Biden had taken office, Donohoe replied, “No,

it's not. It's never too late, ever." He then stated, "Facial recognition doesn't mean shit when you got 5.56 green tip," which appears to be a reference to armor-piercing ammunition for assault rifles.

Moreover, as Magistrate Judge Harvey found, Donohoe's "actions with respect to secure communications and deletion of evidence reflect poorly" on Donohoe's character in a way that "cancels" out the "defendant's positive attributes" from his past. *Id.* at 29:19-30:12. As the Chief Judge in the District of Columbia noted with regard to different rioter:

[H]is more recent behavior surrounding the events January 6 gives rise to significant concerns about the danger he may present to the community. As explained above, the extent of his involvement in the mob clearly poses a danger. In addition, in the nearly two months that have passed since January 6, defendant has not exhibited any remorse for what occurred at the Capitol. Nothing in the record suggests that he has any remorse about the events of January 6 or disclaimed the beliefs and gang membership animating his actions on that day, and thus there is no evidentiary basis to assume that defendant will refrain from similar activities, if instructed, in the future.

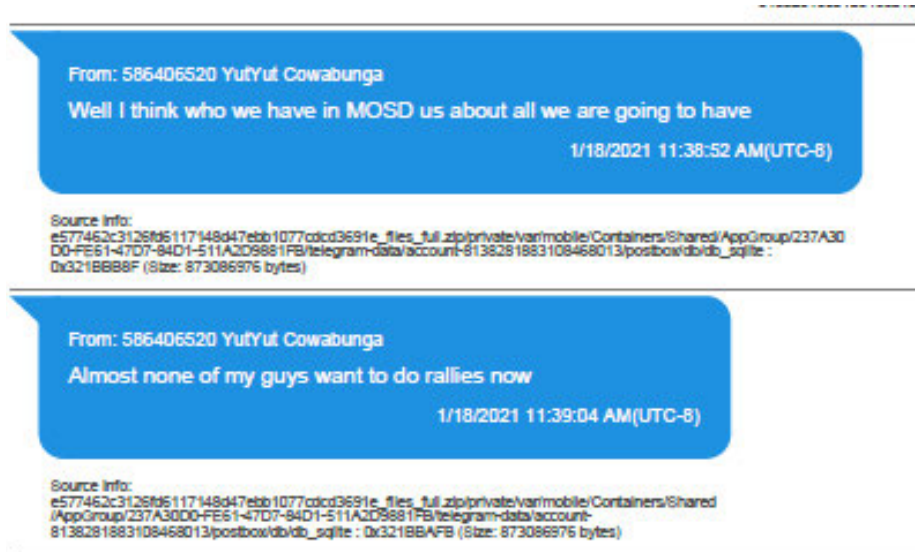
United States v. Chrestman, 21-mj-160 (ECF 23 at 27-28). Likewise, Donohoe has not disclaimed "the beliefs and [] membership animating his actions that day." *Id.* On the contrary, as noted above, he has expressed pride in what he and his co-conspirators achieved on January 6. Accordingly, there is every reason to believe that the views expressed by the Defendant regarding January 6 would animate similar conduct in the future.

4. The Nature and Seriousness of the Danger Posed by Release

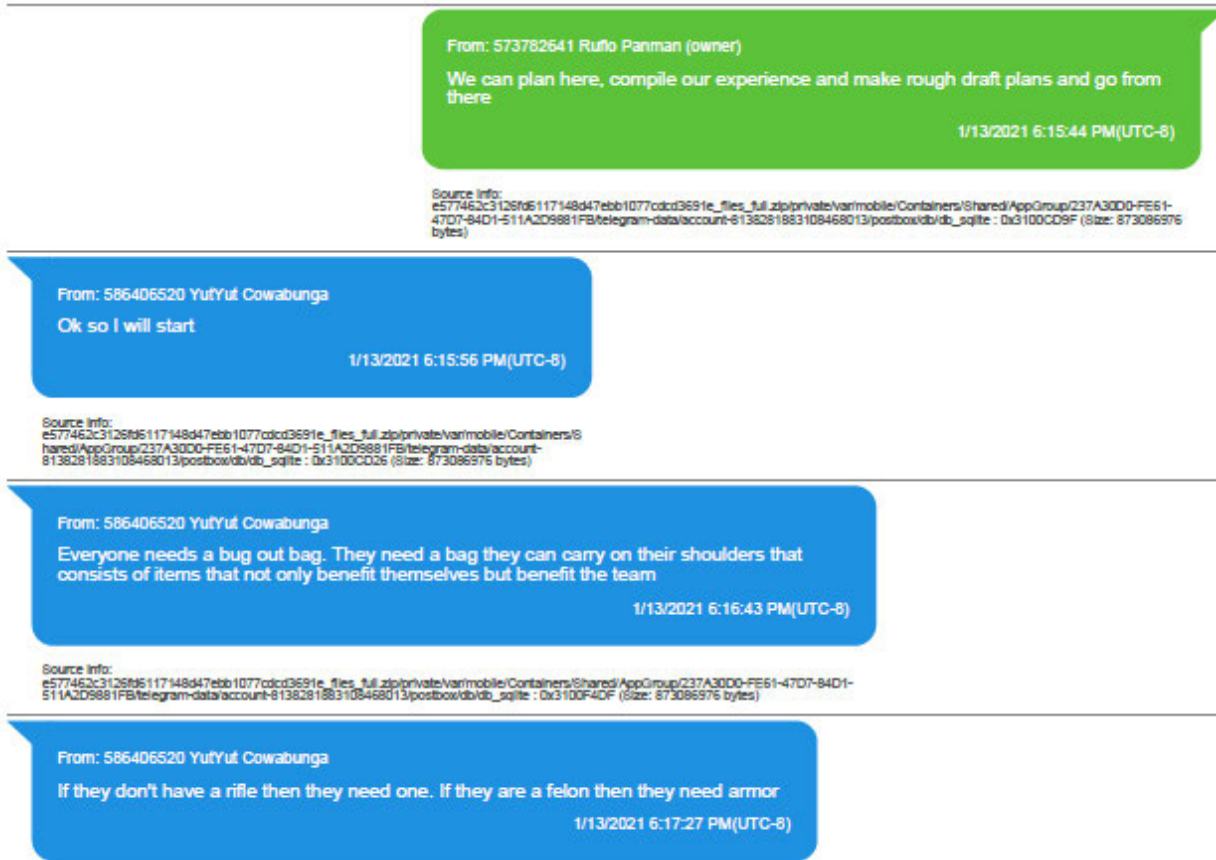
Allowing the Defendant to be released pending trial, even to home confinement, would leave a man who has the wherewithal to help plan and lead a large group of men in a violent attack to take similar actions in the future.

The Defendant poses an identifiable and articulable threat to an individual or the community such that no condition or combination of conditions can ensure the safety of the public.

Here, the Defendant remained committed to efforts to resist well after January 6. In discussions of the possibility of future “rallies,” Donohoe indicated that only the MOSD members were likely to continue.



Similarly, Donohoe remained in contact with co-defendant Nordean. Among Donohoe’s communications with Nordean, Donohoe suggested arrangements for “bug out” bags and equipment.



Donohoe later reported in the Telegram messages that he worked with others to develop a “Proud Boy” bug out kit. Donohoe then shared the details of the kit with others in the Telegram groups, including where to buy it. Nordean subsequently passed on the information to his contacts in a separate message room in Telegram.

These plans and countermeasures underscore the identifiable threat posed by Donohoe and his co-defendants. Indeed, Donohoe poses the same risk of danger to others and the community that he posed leading up to and on January 6. He should therefore be detained.

CONCLUSION

When all these factors are evaluated, the Defendant cannot rebut the presumption in favor of detention under 18 U.S.C. § 3142(e)(3)(C). Even if he could, there is clear and convincing evidence that no condition or combination of conditions will reasonably assure the safety of the community if the Defendant is released, even to home confinement.

WHEREFORE, the government respectfully submits that its motion for pretrial detention should be granted and the Defendant ordered detained pending trial in the District of Columbia.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of this pleading to be served upon defense counsel via the Electronic Case Filing (ECF) system, on May 17, 2021, and by email to Lisa Costner (Defendant's counsel of record).

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