

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

v. :

Case No. 21-CR-599 (RBW)

DONNIE DUANE WREN,
THOMAS HARLEN SMITH

Defendants. :

MOTION TO COMPEL DISCLOSURE OF THE IDENTITY OF CONFIDENTIAL
HUMAN SOURCES AND UNDERCOVER LAW ENFORCEMENT

The Defendant, Donnie Wren, through undersigned counsel and pursuant to Rule 16, Federal Rules Criminal Procedure, moves to compel disclosure of the identity of confidential human sources and undercover law enforcement officers including body worn camera footage, who were present on the Capitol Grounds on January 6, 2021, and as good grounds would show:

1. Rule 16(c) imposes upon the government a continuing duty to disclose otherwise discoverable materials. Such disclosure is necessary to ensure a fair trial for the Defendant.
2. Undersigned counsel has recently learned that there were various confidential human sources and undercover law enforcement officers present on the Capitol Grounds on January 6, 2021.
3. Defendant seeks disclosure of the identity of these under confidential human sources and undercover law enforcement officers to ensure a fair trial for the Defendant and seeks the courts assistance in said disclosure.
4. Upon information and belief these officers acted in a manner inconsistent with maintaining a restricted area and encouraged protestors to continue their presence in that restricted area and to further engage uniform law enforcement.

WHEREFORE, based upon the foregoing, the Defendant respectfully requests this Court to grant the relief requested herein.

CERTIFICATE OF SERVICE

I certify that on this 18th day of April 2023, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing.

Respectfully Submitted,

/s/ George T. Pallas

/s/ Dylan George Barket