

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

|                                 |   |                                    |
|---------------------------------|---|------------------------------------|
| <b>UNITED STATES OF AMERICA</b> | : | <b>CRIMINAL NO. 21-cr-28 (APM)</b> |
|                                 | : |                                    |
| v.                              | : |                                    |
|                                 | : |                                    |
| <b>DONOVAN CROWL,</b>           | : |                                    |
| <b>SANDRA PARKER,</b>           | : |                                    |
| <b>BENNIE PARKER,</b>           | : |                                    |
| <b>LAURA STEELE,</b>            | : |                                    |
| <b>CONNIE MEGGS,</b>            | : |                                    |
| <b>WILLIAM ISAACS,</b>          | : |                                    |
| <b>JAMES BEEKS, and</b>         | : |                                    |
| <b>MICHAEL GREENE,</b>          | : |                                    |
|                                 | : |                                    |
| <b>Defendants.</b>              | : |                                    |

**JOINT PRETRIAL STATEMENT**

Pursuant to the Court's Pretrial Order, ECF No. 703, the parties hereby submit their Joint Pretrial Statement. Enclosed with this statement are the following materials:

1. Proposed Preliminary Jury Instructions (Ex. 1)<sup>1</sup>
  - a. Proposed Preliminary Jury Instructions (Clean)
  - b. Proposed Preliminary Jury Instructions (Redline)
2. Government Witness List (Ex. 2)
3. Government Exhibit Lists (Ex. 3), including:
  - a. Government List of Anticipated Exhibits<sup>2</sup>

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<sup>1</sup> The government submits a version of the preliminary instructions redlined from those the Court delivered during the first trial of *United States v. Rhodes, et al.*, 22-cr-15-APM, on October 3, 2022, as well as a clean version. The government provided the draft of these instructions to the defense on January 9, 2023, and has not received any objections.

<sup>2</sup> The government has communicated to defense counsel that it intends to supplement its exhibit list with additional exhibits in the near future. As in the two previous trials in the related *Rhodes*

- b. Government List of Messages<sup>3</sup>
- 4. Defendants' Proposed Witness and Exhibit Lists
  - a. No defendants have submitted proposed witness and exhibit lists.
- 5. Proposed Final Jury Instructions (Ex. 5)<sup>4</sup>
  - a. Proposed Final Jury Instructions (Clean)
  - b. Proposed Final Jury Instructions (Redline)
- 6. Proposed Verdict Form (Ex. 6)<sup>5</sup>
  - a. Proposed Verdict Form (Clean)
  - b. Proposed Verdict Form (Redline)

\* \* \*

WHEREFORE, the parties respectfully submit this Joint Pretrial Statement for the Court's consideration.

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case, the government will move for the admission of a number of these exhibits through business records certifications, pursuant to FRE 902(11). Consistent with the rule, the government has provided the defense with a copy of these business records certifications on January 7, 2023. The government also anticipates that a number of exhibits will be admitted pursuant to stipulation by the parties. The government provided the defense with its proposed stipulations on January 7, 2023. The parties are still discussing these stipulations.

<sup>3</sup> The government has communicated to defense counsel that it may supplement its statements list with a few additional statements between now and trial, and the government has received no objections.

<sup>4</sup> The government submits a version of the proposed final jury instructions redlined from those the Court issued during the first trial on November 17, 2022, as well as a clean version. The government provided the defense with these draft proposed instructions in mid-December 2022 and has not received any objections. Defendant Isaacs has stated he does not have any objections at this time but reserves the right to propose additions and edits at the close of trial.

<sup>5</sup> The government submits a version of the verdict form redlined from the form used by the Court during the first *Rhodes* trial, as well as a clean version. The government provided the defense with the draft proposed verdict form in mid-December 2022 and has not received any objections.

Respectfully submitted,

/s/  
CARMEN HERNANDEZ, ESQ.  
Attorney for Defendant Crawl

/s/  
JOHN MACHADO, ESQ.  
Attorney for Defendant Sandra Parker

/s/  
STEPHEN BRENNWALD, ESQ.  
Attorney for Defendant Bennie Parker

/s/  
PETER COOPER, ESQ.  
Attorney for Defendant Steele

/s/  
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/s/  
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Attorneys for Defendant Isaacs

/s/  
JAMES BEEKS  
On Behalf of Himself

/s/  
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/s/  
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