

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

KELLY MEGGS

ACCUSED

*Styled as USA v. STEWART RHODES, et al.
incorporating cases against multiple Defendants*

Criminal Case No.
1:22-cr-00015-APM

Assigned to the Honorable Amit
Mehta, District Court Judge

**ACCUSED KELLY MEGGS' MOTION FOR DISCLOSURE
OF MATTERS OCCURRING BEFORE THE GRAND JURY**

The Accused, Kelly Meggs, by counsel, pursuant to pretrial discovery under Rules 6(e)(3)(C) and 16(a)(1)(A) and Rule 16 of the Federal Rules of Criminal Procedure and *Brady v. Maryland*, 373 U.S. 83 (1963) and progeny, moves this Court for entry of an Order disclosing to the Accused the following information pertaining to the Grand Jury which returned this Indictment as it relates to this case, and for his grounds files his companion Memorandum of Law.

CONSULTATION WITH THE PARTIES

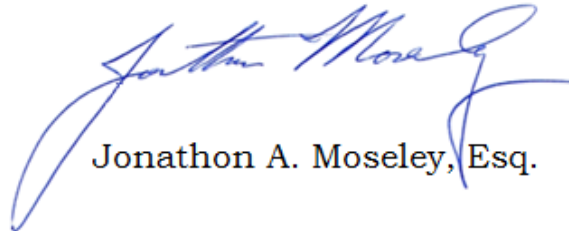
Defendant Kelly Meggs, by counsel, requested the position of the Government. In response, the USAO refused to provide any information or documents from the Grand Jury presentations except the transcripts of the witnesses that have been identified and their exhibits associated with their testimony presented to the Grand Jury.

REQUEST FOR VERBAL ARGUMENT

Defendant Kelly Meggs, by counsel, requests verbal argument upon the Motion.

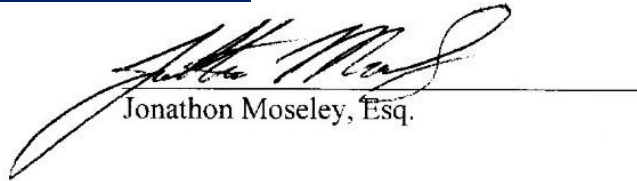
Dated: February 13, 2022

RESPECTFULLY SUBMITTED
KELLY MEGGS, *By Counsel*



Jonathon A. Moseley, Esq.

USDCDC Bar No. VA005
Virginia State Bar No. 41058
Mailing address only:
5765-F Burke Centre Parkway, PMB #337
Burke, Virginia 22015
Telephone: (703) 656-1230
Contact@JonMoseley.com
Moseley391@gmail.com



Jonathon Moseley, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2022, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following CM/ECF participants. From my review of the PACER / ECF docket records for this case that the following attorneys will receive notice through the ECF system of the U.S. District Court for the District of Columbia.

Jeffrey S. Nestler
U.S. ATTORNEY'S OFFICE
555 Fourth Street NW
Washington, DC 20530
202-252-7277
jeffrey.nestler@usdoj.gov

Kathryn Leigh Rakoczy

U.S. ATTORNEY'S OFFICE FOR THE DISTRICT OF COLUMBIA
555 Fourth Street, NW
Washington, DC 20530
(202) 252-6928
(202) 305-8537 (fax)
kathryn.rakoczy@usdoj.gov

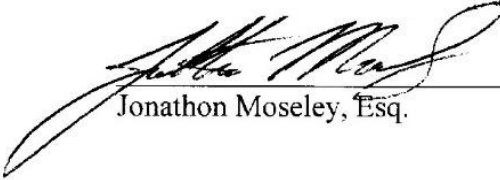
Justin Todd Sher
U.S. DEPARTMENT OF JUSTICE
950 Pennsylvania Avenue NW
Washington, DC 20530
202-353-3909
justin.sher@usdoj.gov

Troy A. Edwards, Jr
U.S. ATTORNEY'S OFFICE FOR THE DISTRICT OF COLUMBIA
555 4th Street, NW
Washington, DC 20001
202-252-7081
troy.edwards@usdoj.gov

Alexandra Stalimene Hughes
DOJ-Nsd
950 Pennsylvania Ave NW
Washington DC, DC 20004
202-353-0023
Alexandra.Hughes@usdoj.gov

Louis J. Manzo
DOJ-CRM
1400 New York Ave NW
Washington, DC 20002
202-616-2706
louis.manzo@usdoj.gov

Ahmed Muktadir Baset
U.S. ATTORNEY'S OFFICE
United States Attorney's Office for the District of Col
555 Fourth Street, N.W., Room 4209
Washington, DC 20530
202-252-7097
ahmed.baset@usdoj.gov



Jonathon Moseley, Esq.