

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

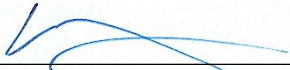
UNITED STATES OF AMERICA	:	
	:	CRIMINAL NO. 21-cr-28 (APM)
v.	:	
	:	
THOMAS CALDWELL,	:	
DONOVAN CROWL,	:	
JESSICA WATKINS,	:	
SANDRA PARKER,	:	
BENNIE PARKER,	:	
GRAYDON YOUNG,	:	
LAURA STEELE,	:	
KELLY MEGGS,	:	
CONNIE MEGGS, and	:	
KENNETH HARRELSON,	:	
	:	
Defendants.	:	

NOTICE OF FILING

The United States, by and through its attorney, the United States Attorney for the District of Columbia, respectfully notes the filing of the attached discovery letter and attachments.

Respectfully submitted,

CHANNING D. PHILLIPS
Acting United States Attorney

By: 

 Kathryn L. Rakoczy
 D.C. Bar No. 994559
 Ahmed M. Baset
 Troy A. Edwards, Jr.
 Louis A. Manzo
 Jeffrey S. Nestler
 Assistant United States Attorneys


/s/ Alexandra Hughes

 Alexandra Hughes
 Justin Sher
 Trial Attorneys

National Security Division
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2021, a copy of the foregoing Notice of Filing was served via electronic case filing and e-mail to counsel for the defendants.



Kathryn L. Rakoczy
Assistant United States Attorney



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

*Judiciary Center
555 Fourth St., N.W.
Washington, D.C. 20530*

March 24, 2021

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Re: *United States v. Thomas Caldwell, et al.*
Case No. 21-cr-028 (APM)

Dear Counsel:

This letter is intended to memorialize discovery previously provided in this matter:

On February 12, 2021, we uploaded an initial discovery production to the U.S. Attorney's Office file sharing program, USAfx. This folder contained, generally, (1) law enforcement reports related to the arrests of Thomas Caldwell, Jessica Watkins, and Donovan Crowl; (2) the results of searches of the residences, electronic devices, and

Facebook accounts of Defendants Caldwell, Watkins, and Crowl;¹ (3) legal process related to these searches; (4) recorded statements of Defendants Caldwell, Watkins, and Crowl to law enforcement; and (6) some public photos and videos relevant to the offenses charged in the indictment.

On March 4, this discovery folder was supplemented to add (1) law enforcement reports related to the arrests of Sandra and Bennie Parker; (2) recorded statements of Defendants Sandra and Bennie Parker to law enforcement; and (3) additional messages found on Defendant Caldwell's phone.

On March 10, 2021, the discovery folder was updated to add: (1) a transcription of a Signal chat entitled, "DC OP: Jan 6 21;" (2) a log for the Zello channel "Stop the Steal J6;" (3) law enforcement reports related to the arrests of Defendants Kelly and Connie Meggs; (4) transcripts of the custodial interviews of Defendants Kelly and Connie Meggs; (5) hotel and banking records related to Defendants Kelly Meggs, Connie Meggs, and Young; (6) certain emails relevant to Defendants Young and Steele; and (7) Facebook records for Defendants Kelly Meggs and Young.

On March 11, 2021, the discovery folder was supplemented to add: (1) a law enforcement report related to the arrest of Defendant Young; and (2) a D.C. Metropolitan Police Department report related to an investigative stop of Defendants Crowl, Watkins, Sandra Parker, and Bennie Parker on January 6, 2021, at around 4:45 p.m.

On March 16, 2021, the discovery folder was updated to add: (1) law enforcement reports related to the arrest of Defendant Steele; and (2) the recorded statement of Defendant Steele.

On March 23, 2021, we added a Facebook search warrant return for Defendant Steele's account to the discovery folder.

On March 24, 2021, we added to the discovery folder: (1) subpoena returns from "Go To Meeting," and (2) some additional public source videos collected during this investigation.

As counsel for the defendants entered their appearances in the above-captioned matter, we granted them access to the USAfx folder containing the initial discovery materials summarized above. An index of the discovery provided to date is enclosed as Exhibit 2.

Due to the extraordinary nature of the January 6, 2021 Capitol Attack, the government anticipates that a large volume of materials may contain information relevant to this prosecution. These materials may include, but are not limited to, surveillance video, statements of similarly

¹ Mr. Crowl's residence was not searched; however, we did provide information about a protective vest that was recovered from a location at which Mr. Crowl stayed after January 6, 2021, and Mr. Crowl's cell phone and Facebook account were both searched, and the results of those searches were provided via the discovery folder.

situated defendants, forensic searches of electronic devices and social media accounts of similarly situated defendants, and citizen tips. The government is working to develop a system that will facilitate access to these materials. In the meantime, please let us know if there are any categories of information that you believe are particularly relevant to your client. Furthermore, additional materials will be provided after the entry of a Protective Order in this case.

We recognize the government's discovery obligations under *Brady v. Maryland*, 373 U.S. 83 (1963), its progeny, and Rule 16. To that end, we made disclosures to you on the following dates:

1. On February 22, 2021, the government sent the e-mail attached as Exhibit 3 to counsel for Defendant Watkins, in advance of a hearing regarding Defendant Watkins' motion for review of her detention order.
2. On March 12, 2021, the government sent the e-mail attached as Exhibit 4 to all of the above-listed counsel.
3. On March 23, 2021, the government sent the e-mail attached as Exhibit 5 to counsel for Defendant Watkins.

We will continue to provide timely disclosure if any such additional material comes to light. Consistent with *Giglio, Ruiz*, and 18 U.S.C. § 3500, we will provide information about government witnesses prior to trial and in compliance with the court's trial management order.

We request reciprocal discovery to the fullest extent provided by Rule 16 of the Federal Rules of Criminal Procedure, including results or reports of any physical or mental examinations, or scientific tests or experiments, and any expert witness summaries. We also request that defendants disclose prior statements of any witnesses whom the defendants intend to call to testify at any hearing or trial. *See Fed. R. Crim. P. 26.2; United States v. Nobles*, 422 U.S. 255 (1975). We request that such material be provided on the same basis upon which the government will provide defendants with materials relating to government witnesses.


Additionally, pursuant to Federal Rules of Criminal Procedure 12.1, 12.2, and 12.3, we request that defendants provide the government with the appropriate written notice if defendants plan to use one of the defenses referenced in those rules. Please provide any notice within the time period required by the Rules or allowed by the Court for the filing of any pretrial motions.

We will forward additional discovery as it becomes available. If you have any questions, please feel free to contact us.

Sincerely,

CHANNING D. PHILLIPS
Acting United States Attorney

By:



Kathryn L. Rakoczy
D.C. Bar No. 994559
Ahmed M. Baset
Troy A. Edwards, Jr.
Louis A. Manzo
Jeffrey S. Nestler
Assistant United States Attorneys

/s/ Alexandra Hughes

Alexandra Hughes
Justin Sher
Trial Attorneys
National Security Division
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Enclosures

Main Folder	Subfolder	Document	Beg Bates Number	End Bates Number	File Type	Notes
Arrest Paperwork	Caldwell	Caldwell 302 1/19/2021	CALDWELL-000001	CALDWELL-000001	pdf	
	Crowl	Serials 22, 23, 35-38	CROWL-000001	CROWL-000021	pdf	
	Watkins	Serials 25, 35, 36, 51, ansd52	WATKINS-000001	WATKINS-000017	pdf	
	Sandra Parker		N/A	N/A	pdf	
	Bennie Parker		N/A	N/A	pdf	
	Kelly Meggs	Arrest and Interview 302s	N/A	N/A	pdf	
	Connie Meggs	Arrest and Interview 302s	N/A	N/A	pdf	
	Young	Arrest 302	N/A	N/A	pdf	
	Steele	Interview session report, Attempted Interview & Transport 302, and Arrest 302	N/A	N/A	pdf	
Arrest Warrants	Amended Complaint	Amended Complaint	AMENDED-000001	AMENDED-000025	pdf	
	Caldwell	Complaint/Arrest Warrant	CALDWELL-000197	CALDWELL-000216	pdf	
	Crowl	Complaint/Arrest Warrant	CROWL-000139	CROWL-000156	pdf	
	Watkins	Complaint/Arrest Warrant	WATKINS-000168	WATKINS-000187	pdf	* WATKINS-000167 - LEFT BLANK (accidentally skipped over this one)
	Parkers	Complaint/Arrest Warrant	N/A	N/A	pdf	
Cell Phone	Caldwell	Search Warrant - Premises and Devices	CALDWELL-000133	CALDWELL-000196	pdf	
		274_Wadesville_Warrant_Return	N/A	N/A	pdf	NATIVE Can't not open the 274 warrant return to bates label, do we have another copy
		Call log	N/A	N/A	excel	NATIVE
		Chats	N/A	N/A	excel	NATIVE
		Contacts	N/A	N/A	excel	NATIVE
		Emails	N/A	N/A	excel	NATIVE
		IM	N/A	N/A	excel	NATIVE
		Web history	N/A	N/A	excel	NATIVE
	Crowl	FBI Reports	CROWL-000093	CROWL-000094	pdf	
		Search Warrant - phone aff	CROWL-000095	CROWL-000138	pdf	
		Phone SW			pdf	Can't open
		Phone Application			pdf	can't open
		Call Log	N/A	N/A	excel	NATIVE
		Contacts	N/A	N/A	excel	NATIVE
		SMS Log	N/A	N/A	excel	NATIVE
		Phone Search_SA Eller	N/A	N/A	excel	NATIVE
		Cellbirite Report	N/A	N/A	html, pdf, UFDR	NATIVE
	Watkins	FBI Reports	WATKINS-000188	WATKINS-000193	pdf	
		Serial 67 1A 35 Physical	N/A	N/A	pdf	can't open to bates label, do we have another copy.
		Search Warrant				
	Search Warrant -Second Phone			pdf		

Main Folder	Subfolder	Document	Beg Bates Number	End Bates Number	File Type	Notes
		Cellphone snapshot LG (DSC-886 TO DSC-900)	N/A	N/A	jpg	NATIVE
		Cellphone Snapshot - (DSC-825 TO DSC-885)	N/A	N/A	jpg	NATIVE
		Report 1	N/A	N/A	excel	NATIVE
		Report 2	N/A	N/A	excel	NATIVE
		Report 3	N/A	N/A	excel	NATIVE
		Samsung Cellbrite Report	N/A	N/A	Two pdf zip file	NATIVE
Comfort Inn Records and CCTV		CCTV Images	N/A	N/A	jpg	
		FBI Report	CCTV-000001	CCTV-000001	pdf	
		Zip jpg files	N/A	N/A	jpg	
		Comfort Inn pdfs	COMFORTINN-000001	COMFORTINN-000028	pdf	
Hotel and banking records - Young, Meggs		Image files	N/A	N/A	jpg	NATIVE
Defendant Statements	Caldwell	Serials 15, 20, and 45	CALDWELL-000002	CALDWELL-000008	pdf	
		Caldwell interview video	N/A	N/A	mp4	NATIVE
	Crowl	Serials 49	CROWL-000022	CROWL-000023	pdf	
		Crowl interview video	N/A	N/A	mp4	NATIVE
	Watkins	Serials 51	WATKINS-000018	WATKINS-000019	pdf	
		Serials 36	CROWL-000016	CROWL-000017	pdf	duplicate files, identical to Crowl subfile
		Urbana PD Watkins Interview	N/A	N/A	zip	NATIVE
	Bennie Parker	Serial 7	N/A	N/A	pdf	
		Bennie Parker interview video	N/A	N/A	Hawk	NATIVE
	Sandra Parker	Serial 18	N/A	N/A	pdf	
		Sandra Parker interview video	N/A	N/A	Hawk	NATIVE
	Kelly Meggs	Kelly Meggs interview transcript	N/A	N/A	pdf	
	Connie Meggs	Connie Meggs interview transcript	N/A	N/A	pdf	
Laura Steele	Steele interview video	N/A	N/A	mp4	NATIVE	
Facebook Returns	Caldwell, Crowl, Watkins	2702 Forms	FACEBOOK-000001	FACEBOOK-000014	pdf	
		Serials 5 through 8	FACEBOOK-000015	FACEBOOK-000827	pdf	
		Serials 6 and 8 zip files	N/A	N/A	html	NATIVE
	Kelly Meggs	Facebook return	N/A	N/A	pdf	
	Young	Facebook return	N/A	N/A	pdf	
	Steele	Facebook return	N/A	N/A	pdf	
Location Data	PRTT - GPS Sharon Caldwell	21-sc-158 AT&T Search Warrant	SCALDWELL-000001	SCALDWELL-000037	pdf	
		Serial 12	SCALDWELL-000038	SCALDWELL-000038	pdf	
		Serial 12 1A zip file	N/A	N/A		NATIVE
		Caldwell_3957	N/A	N/A		NATIVE

Main Folder	Subfolder	Document	Beg Bates Number	End Bates Number	File Type	Notes
Open Source Photos and Videos		Serials 5 & 14, pdf documents	OPENSOURCE-000001	OPENSOURCE-000049	pdf	
		photos & videos	N/A	N/A	png, jpg, & mp4	NATIVE
Search of Caldwell Residence	Additional Photos	DSCN1647 - DSCN-1658	N/A	N/A	jpg	NATIVE
	Photos of Most of the Documents Seized	DSCN1659 - DSCN1695	N/A	N/A	jpg	NATIVE
	SW and Return	274 Wadesville Road	CALDWELL-000063	CALDWELL-000132	pdf	One page from this data set was redacted because it contained phone numbers of the agents involved in this search
		Serials 17, 21, 23-25, 32-33	CALDWELL-000009	CALDWELL-000062	pdf	
		Serial 23 zip files	N/A	N/A	jpg	
Search of Crowl Quarters		Serial 11 FD-1087	CROWL-0000092	CROWL-000092	pdf	
		images	N/A	N/A	jpg	NATIVE
Search of Watkins' Residence & Car	FBI Reports	Serials 20, 26, and 50	WATKINS-000020	WATKINS-000056	pdf	
	Search Warrants	102 Main & Gray Ford	WATKINS-000057	WATKINS-000162	pdf	
	Photos zip file	102 N. Main St. & 2008 Ford Fusion	N/A	N/A	jpg	NATIVE
		Seizure List Watkins Residence	WATKINS-000163	WATKINS-000166	pdf	
Zello Recording		Serials 9, 15, and 38	ZELLO-000001	ZELLO-000007	pdf	
		2 Audio files	N/A	N/A	mp3	NATIVE
MPD Stop of Crowl		Report and photos	N/A	N/A	jpg and pdf	NATIVE
Young Emails		Relevant emails	N/A	N/A	pdf	
Production 3-10-2021		DC OP Jan 6 21 Signal Chat	N/A	N/A	excel	NATIVE
		STOP THE STEAL J6	N/A	N/A	txt	NATIVE
Additional Items from Caldwell Phone	Caldwell Cell Signal Screenshots		N/A	N/A	zip	
	Caldwell Telegram zip		N/A	N/A	zip	
Go To Meeting		GoToMeetingReturn.zip	N/A	N/A	zip	NATIVE

Rakoczy, Kathryn (USADC)

From: Rakoczy, Kathryn (USADC)
Sent: Monday, February 22, 2021 2:50 PM
To: Shelli Peterson
Cc: Baset, Ahmed (USADC)
Subject: U.S. v. Watkins - discovery and text messages

Hi Shelli,

Ahmed and I are still working on a more formal letter to document what we gave you last week for discovery, but we did want to flag for you some information and some of Ms. Watkins' text messages, in case you did not read them yet, to the extent that they could be relevant to your arguments for tomorrow's detention hearing.

First, W-1 is a witness who was interviewed, who knows your client and other members of her militia, and he generally stated that your client is a peaceful person and not the type to engage in a conspiracy to overthrow the government.

With respect to text messages that we wanted to flag:

- In messages 151-162, your client has a conversation with co-defendant Caldwell after the riot. Your client expresses some concern about getting in trouble for what she did on January 6, 2021, to which Caldwell responds that if that happens, "[Y]ou were with me all the time and I'll swear to it." Your client states, "There's too much evidence contrary. Perjury bad, lol. I won't worry then..."
- Your client texted statements prior to January 6, 2021, of the need to vote, engage in peaceful protest, how the legal system works, and the need to engage in legal forms of resistance (see in particular texts 957, 972, on 11/16/20). See also message 2180, in describing her militia's approach, Watkins says, "Keep it peaceful, but I will use a force that rivals none if it gets physical. Deadly force should be avoided at all costs according to me. Only if my life is in eminent danger." In message 2178, she continued, "If I'm carrying a trauma bag I'm normally not carrying a sidearm unless there was a 100% chance I would need it."
- After January 6, 2021, your client exchanged texts that she engaged in peaceful conduct on January 6, 2021, and was not violent and did not vandalize anything. For example:
 - In message 23 in the extraction log, from 1/12/2021 7:51:01 PM(UTC-5), she said, "Oathkeepers are the shit. They rescued cops, WE saved lives and did all the right things."
 - In messages 41-43 in the extraction log, from 1/12/2021 3:21:32-3:25:05 PM(UTC-5), your client stated: "We all went in together as a unit. Nobody said it was illegal, and the cops weren't kicking us out. We followed the group of people until riot cops stopped it, and then we got crushed in the crowd. I stopped a lady from destroying shit and helped a couple people with medical emergencies. That's it. Once the riot cops came out though, we literally packed up our people and left. We went outside again, staged ourselves by (more) riot cops. Talked with them a bit, had another medical patient, then left before curfew."
 - In message 59, in response to a question about whether she knew anything about an Oath Keeper who had been arrested, Watkins responded, "Oh? No I didn't hear about any. Was it that guy with the long goofball beard and the OK hat? Who is he anyway? None of our guys broke any laws. I know they were looking for 2 others in like a poster of wanted people but I have no idea what they may have done. They were like Carolina or Florida or something. I did hear some OK's even rescued cops in a room they were stuck in apparently, not sure who did that though"
 - In message 113, upon hearing from another Oath Keeper that everyone from his group from January 6th was alright, Watkins responded, "Glad to hear everyone is ok. I was getting worried they were targeted unfairly. I'm so very proud of all of us man. We did good good shit. We stopped destruction, helped the injured and some other Oathkeepers rescued Police from a room they were trapped in. Be proud. You've got true Patriots under your command."

- In messages 174 and 176, in response to a question of whether she was alright, Watkins responded, "We didn't break any laws so we're good. Cops stopped us on our way to our vehicle. Checked us for weapons, took our info and left. We did go in though, but we were helping the injured, some Oath keepers apparently rescued cops from a room they were trapped in. When the riot cops showed up, we left. We knew we weren't allowed inside anymore. The cops outside were polite to us. I think we're fine. They're looking for people who tore shit up or fought the cops. To which, I say 'good[.]'"
- In messages 247-249, your client says, "The news is lying. Bad. Calling us rioters, mob, etc. We were peaceful, but they assaulted us. Me included. I saved 2 people though. Asthmatics that got teargassed[.]"

Thanks,
Kate

Kathryn L. Rakoczy

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(office phone)

(cell phone)

Kathryn.Rakoczy@usdoj.gov

Rakoczy, Kathryn (USADC)

From: Rakoczy, Kathryn (USADC)
Sent: Friday, March 12, 2021 1:34 AM
To: fischer and putzi fischer; David Wilson; Shelli Peterson; Carmen D. Hernandez; John Machado; sfbrennwald_cs.com; Desiree Wilson; Robert Foley Law Firm; Peter Cooper
Cc: Baset, Ahmed (USADC); Edwards, Troy (USADC); Manzo, Louis (CRM); Sher, Justin (NSD); Hughes, Alexandra (NSD); Nestler, Jeffrey (USADC)
Subject: Additional disclosures in U.S. v. Thomas Caldwell, Jessica Watkins, Donovan Crowl, Sandra Parker, Bennie Parker, et al.

Dear Counsel,

We are writing to flag a few additional facts relevant to some of your clients' conduct on January 6, 2021:

- As mentioned at the detention hearing for Ms. Watkins, surveillance footage from inside the Capitol shows Ms. Watkins, Mr. Crowl, Mr. Young, Ms. Steele, and Ms. Sandra Parker helping an individual who appears to be part of the larger group of Oath Keeper members and affiliates out of the Capitol. That individual appears to be in need of aid after an interaction with law enforcement inside the Capitol.
- The D.C. Metropolitan Police Department stopped the Parkers, Mr. Crowl, and Ms. Watkins on 14th and F Streets at around 4:45 pm. There are BWC files that we hope to provide you once we have a protective order in place. Ms. Watkins and Mr. Crowl said they did not bring their IDs, but they provided names and contact info. The Parkers both showed their IDs.
- As noted in the indictment, the Capitol suffered millions of dollars in damage during the attack on January 6, 2021—including broken windows and doors, graffiti, and residue from pepper spray, tear gas, and fire extinguishers deployed both by crowd members who stormed the Capitol and by Capitol Police officers trying to restore order. The doors through which your clients entered the building were among those parts of the Capitol that were damaged. Three glass window panes on those doors were broken, an exterior handle was torn off, and one of the door stops was broken, among other damage. Capitol surveillance video footage as well as publicly available video footage suggests that the damage to the glass window panes on these doors was done prior to your clients' entry through the doors. The timing of the other damage is not clear at this time.

Please feel free to contact us if you have any questions about the information provided above.

Thank you,
Kate Rakoczy

Kathryn L. Rakoczy
Assistant United States Attorney
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Kathryn.Rakoczy@usdoj.gov

Rakoczy, Kathryn (USADC)

From: Baset, Ahmed (USADC)
Sent: Tuesday, March 23, 2021 9:00 AM
To: Shelli Peterson
Cc: Rakoczy, Kathryn (USADC); Manzo, Louis (CRM); Nestler, Jeffrey (USADC); Edwards, Troy (USADC); Hughes, Alexandra (NSD); Sher, Justin (NSD)
Subject: Disclosures in US v. Jessica Watkins (20-cr-28)

Good morning, Shelli,

We are writing to flag a few additional facts pertinent to the investigation into Ms. Watkins's conduct on January 6, 2021:

- In a slide show of photos published by the Washington Post, your client is depicted assisting a distressed person on slide 26: https://www.washingtonpost.com/graphics/photography/2021/01/06/photos-scene-capitol-dc/?itid=lk_readmore_manual_6.
- Two bomb making recipes were found in your client's home during a residential search. The purported author was an individual named "Jolly Roger." The Jolly Roger is the ghost author of various manuals and instructions on committing violent crimes, acts of destruction, and financial fraud. Among them, are recipes on "Making Plastic Explosives from Bleach," and producing "Thermite," a known pyrotechnic. The explosive-making instructions located in your client's home during the execution of the search warrant appear to be print outs of these two recipes from The Anarchist's Cookbook 2000, which is available online: <http://bnrg.cs.berkeley.edu/~randy/Courses/CS39K.S13/anarchistcookbook2000.pdf>.
- An open source video published by Newsflare.com appears to depict Ms. Watkins and other Oath Keepers members among a crowd of rioters inside of the Capitol and involved in a confrontation with law enforcement officers. The 3:26 minute video is accessible by visiting this link: https://www.liveleak.com/view?t=9Zobj_1610107203. In addition, a 0:09 second video published by the New York Times appears to capture a different vantage of this confrontation in which an individual resembling Ms. Watkins is yelling "push" and "get in there." It is available at this link: <https://twitter.com/trbrtc/status/1373035428157198337>.

As always, feel free to reach us should you have any questions about the provided information.

Thank you,
Ahmed

Ahmed Baset

Assistant United States Attorney
Public Corruption & Civil Rights Section
U.S. Attorney's Office for the District of Columbia

(o)
(c)