

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Crim. No. 21-cr-00032 (DLF)</b>
	:	
<b>GUY WESLEY REFFITT,</b>	:	
	:	
<b>Defendant.</b>	:	

**NOTICE OF DISCOVERY**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby informs the Court and defense that the attached discovery letter of March 16, 2021, has been provided to the defense in this matter.

Respectfully submitted,

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Acting United States Attorney  
DC Bar No. 415793

By:  \_\_\_\_\_

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U.S. Department of Justice

Channing D. Phillips  
Acting United States Attorney

*District of Columbia*

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

Via USAF<sub>x</sub> and email

March 16, 2021

William L. Welch, III, Esq.  
5305 Village Center Drive, Suite 142  
Columbia, Maryland 21044  
*Attorney for Defendant Reffitt*

Re: *United States v. Guy Reffitt*, 21-cr-32 (DLF)  
Discovery Letter #1

Dear Counsel:

We are writing to provide you with certain information in response to your request for discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure.

The following materials, which have been uploaded to USAfx, are being produced pursuant to our informal agreement – pending the entry of a formal protective order – that the materials will only be used for your client’s defense, that you will not distribute or display the materials to anyone, and that you will permit your client to review but not retain copies.

1. FBI materials
  - a. 2020-12-24 – Guardian lead (4 pgs)
  - b. 2021-01-11 – [REDACTED] interview (8 pgs)
    - i. Attachments:
      1. 6 text message screenshots
      2. 5 photos
      3. 1 Snapchat video
      4. 6 audio recordings<sup>1</sup>
  - c. 2021-01-16 – search warrant execution (3 pgs)
  - d. 2021-01-16 – [REDACTED] interview (5 pgs)

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<sup>1</sup> On March 10 and 13, 2021, we provided you with rough transcripts of these 6 audio recordings.

- e. 2021-01-16 – [REDACTED] interview (3 pgs)
  - f. 2021-01-16 – [REDACTED] interview (4 pgs)
  - g. 2021-01-16 – Guy Reffitt interview (9 pgs)
    - i. Attachment: Audio recording
  - h. 2021-01-16 – Guy Reffitt interview re suppressor (2 pgs)
  - i. 2021-01-25 – [REDACTED] interview (3 pgs)
2. Court filings
- a. 21-mj-66 (D.D.C.)
    - i. Arrest warrant
    - ii. Complaint
    - iii. Affidavit
  - b. 21-mj-91 (D.D.C.)
    - i. Arrest warrant
    - ii. Complaint
    - iii. Affidavit
  - c. 4:21-mj-36 (E.D. Tex.)
    - i. Premises search warrant
  - d. 4:21-mj-35 (E.D. Tex.)
    - i. vehicle search warrant (plate HHF1249)
  - e. 4:21-mj-34 (E.D. Tex.)
    - i. vehicle search warrant (plate MKY6885)
3. Grand jury materials
- a. [REDACTED] transcript
  - b. [REDACTED] transcript
4. Jail calls
- a. 38 jail calls recorded between 2021-01-16 and 2021-01-26
5. Open source media
- a. 2020-10-17 – Texas Freedom Force
    - i. <https://www.txfreedomforce.org/titff-news/alamo-cenotaph-victory-rally-notoneinch6555863>
  - b. 2021-01-06 - The Ingraham Angle (host Laura Ingraham), at about 31:00 in the broadcast
    - i. <https://video.foxnews.com/v/6220908664001#sp=show-clips/full-episodes>
  - c. 2021-01-06 – Flickr (two photos)
    - i. <https://www.flickr.com/photos/wx412/50813869496/sizes/6k/>

- ii. <https://www.flickr.com/photos/49283984@N05/albums/72157713988863981/with/50838553973/>
  - d. 2021-01-06 – Reuters
    - i. <https://www.youtube.com/watch?v=KYCSjNh1FvA&list=PLZhRxE9191zMYuqM0lM3hAgPa0CpYn-dH>
  - e. 2021-01-07 - Fox News at Night (anchor Shannon Bream), at about 1:00 in the broadcast
    - i. <https://video.foxnews.com/v/6221234520001#sp=show-clips>
  - f. 2021-01-18 – NBC5 Dallas-Forth Worth
    - i. <https://www.nbcdfw.com/news/local/wylie-man-who-was-at-capitol-riot-threatened-to-kill-his-family-fbi-says/2530571/>
  - g. 2021-01-20 -- NBC5 Dallas-Forth Worth
  - h. 2021-01-22 – Cuomo Prime Time (CNN)
  - i. 2021-01-24 – New York Times
    - i. <https://www.nytimes.com/2021/01/24/us/politics/jackson-reffitt-father-capitol-riot.html>
  - j. 2021-01-26 – Good Morning America
- 6. Search warrant returns
  - a. Devices
    - i. Spreadsheet of messages (in Excel and PDF)<sup>2</sup>
    - ii. 36 screenshots of messages
    - iii. 1 screenshot of search history
  - b. Facebook
    - i. PDF (1563 pages)
  - c. Life360<sup>3</sup>
    - i. 1 zip file containing 12 total Excel files
- 7. Other records
  - a. Metropolitan Police Department
    - i. PD 32 (Certificate of no record of registration)
    - ii. PD 36 (Certificate of no record of license)
  - b. Melrose Hotel
    - i. Folio
  - c. Texas Secretary of State
    - i. Corporate Records & Business Registrations: TTP Security Services LLC

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<sup>2</sup> This spreadsheet was produced to you on March 14, 2021.

<sup>3</sup> Note that Life360 separately informed the government that the time stamps are in Pacific time.

Please also note that on March 10, 2021, we provided you with a Jan. 26, 2021, email from the government to Mr. Reffitt's Texas counsel, which stated in substance:

*Please be aware of the following non-verbatim information regarding the statements that your client, Guy Reffitt, is alleged to have made to his son and daughter, in the presence of another man, on or around January 11, 2021, while inside his home in Wylie, Texas:*

1. *Mr. Reffitt's daughter stated to the government that she didn't think her brother felt threatened by her father.*
2. *Mr. Reffitt's daughter stated to the government that she never felt threatened by her father, and that she did not think her father would harm her.*
3. *Mr. Reffitt's wife stated to the government that she did not believe Mr. Reffitt would act on his words.*
4. *The other man who was present for the conversation stated to the government that he did not believe that either Mr. Reffitt's son or daughter interpreted Mr. Reffitt's words as a threat.*
5. *Mr. Reffitt's wife stated to the government that neither her son nor daughter felt threatened by Mr. Reffitt's words.*
6. *Mr. Reffitt's wife stated to the government that Mr. Reffitt is "super passionate" and sometimes says things he does not mean.*
7. *Mr. Reffitt's son stated to the news media that he did not think his father would "actually do anything bad," and that he did not think his father would hurt him or kill him.*

*Please also be aware that, following Mr. Reffitt's son's new media appearances, Mr. Reffitt's son created a GoFundMe page, and as of this writing has received pledges of at least \$133,000.*

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Please feel free to contact us with any questions.

Sincerely,

CHANNING D. PHILLIPS  
Acting United States Attorney

By: /s/ Jeffrey Nestler  
Jeffrey Nestler  
Risa Berkower  
Assistant United States Attorneys

Enclosures