

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

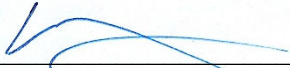
<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CRIMINAL NO. 21-cr-28 (APM)</b>
<b>v.</b>	:	
	:	
<b>THOMAS CALDWELL,</b>	:	
<b>DONOVAN CROWL,</b>	:	
<b>JESSICA WATKINS,</b>	:	
<b>SANDRA PARKER,</b>	:	
<b>BENNIE PARKER,</b>	:	
<b>GRAYDON YOUNG,</b>	:	
<b>LAURA STEELE,</b>	:	
<b>KELLY MEGGS,</b>	:	
<b>CONNIE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

**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

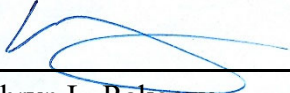
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*/s/ Alexandra Hughes*  
 Alexandra Hughes

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CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2021, a copy of the foregoing Notice of Filing was served via electronic case filing and e-mail to counsel for the defendants.

  
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Kathryn L. Rakoczy  
Assistant United States Attorney



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.  
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April 9, 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 additional discovery materials that we are providing to you today:

First, we have added a folder called “Discovery Production 2 – 4-9-21” to the USAfx discovery box to which you already have been granted access. This production contains roughly 1,600 files consisting mostly of subpoena returns. We are attaching a copy of a log that lists out all of the files included in the Relativity production.

Second, we have created a separate USAfx folder labeled “Highly Sensitive Discovery Materials - U.S. v. Caldwell, et al.” We will provide any materials that we are designating as “Highly Sensitive,” under the terms of the Court’s Protective Order (see ECF No. 123) through this USAfx folder (unless the files are too large, in which case we will provide them to you on a disc or external drive that is also labeled “Highly Sensitive”). Currently, we have placed the following types of files into this folder:


- Some of the U.S. Capitol surveillance video footage obtained to date;<sup>1</sup>
- Damage estimates from the U.S. Capitol;
- Defendants’ complete, not-yet-scoped cell phone search warrant returns; and
- Defendants’ financial records.

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

Sincerely,

CHANNING D. PHILLIPS  
Acting United States Attorney

By:

  
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*/s/ Alexandra Hughes*  
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Justin Sher  
Trial Attorneys  
National Security Division  
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<sup>1</sup> We are waiting to receive official versions of some additional relevant video, which we will make available to as soon as we obtain it. We will e-mail you when we add videos to this folder.