

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

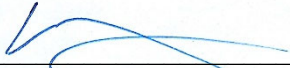
<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CRIMINAL NO. 21-cr-28 (APM)</b>
<b>v.</b>	:	
	:	
<b>THOMAS CALDWELL,</b>	:	
<b>DONOVAN CROWL,</b>	:	
<b>JESSICA WATKINS,</b>	:	
<b>SANDRA PARKER,</b>	:	
<b>BENNIE PARKER,</b>	:	
<b>GRAYDON YOUNG,</b>	:	
<b>LAURA STEELE,</b>	:	
<b>KELLY MEGGS,</b>	:	
<b>CONNIE 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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 \_\_\_\_\_  
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CERTIFICATE OF SERVICE

I hereby certify that on April 23, 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  
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April 23, 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 and information that we are providing to you today and provided you earlier this week:

First, we have added surveillance video to the USAfx folder labeled “Highly Sensitive Discovery Materials - U.S. v. Caldwell, et al.” This surveillance video includes additional, time-stamped video from inside and outside the Capitol from January 6, 2021. We also created a second folder called “Highly Sensitive Discovery Materials 2 - U.S. v. Caldwell, et al.,” to which we uploaded video from the Comfort Inn Ballston from January 5-7, 2021, as documented in the attached “Highly Sensitive Discovery 4-23-21” log.

Second, we have uploaded alternate versions of some materials that we understand some of you were having trouble accessing to the main “U.S. v. Caldwell et al Discovery” folder on USAfx:

- Bennie\_Parker\_1507\_2021-03-26 – this folder contains a .wav file version of Mr. Parker’s custodial interview.
- Sandra\_Parker\_1206\_2021-03026 – this folder contains a .wav files of Ms. Parker’s custodial interview.
- GoToMeeting folder – we added non-zipped .xlsx versions of the two files originally uploaded to this folder. They are the same files as in the zipped version, but at least one of you had trouble opening the zipped versions of the files.

On Wednesday, April 21, 2021, we emailed you about Jon Schaffer, who pled guilty last week, with respect to the information we have at this time about whether Mr. Schaffer has had communications with your clients.


We also emailed you Wednesday night about tour dates that the U.S. Capitol police have offered for defense counsel. I understand that you have concerns about the prohibitions that the Capitol Police have placed on taking photographs during the tour. While we resolve those issues, I still encourage you to sign up for dates.

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,

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Acting United States Attorney

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