

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,	:	
LAURA STEELE,	:	
KELLY MEGGS,	:	
CONNIE MEGGS,	:	
KENNETH HARRELSON,	:	
ROBERTO MINUTA,	:	
JOSHUA JAMES,	:	
JONATHAN WALDEN,	:	
JOSEPH HACKETT,	:	
WILLIAM ISAACS,	:	
DAVID MOERSCHEL, and	:	
BRIAN ULRICH,	:	
	:	
Defendants.	:	

**MOTION FOR AN ORDER TO DISCLOSE ITEMS PROTECTED BY  
FEDERAL RULE OF CRIMINAL PROCEDURE 6(e) AND SEALED MATERIALS**

The United States of America respectfully moves for entry by this Court of an order permitting the disclosure in discovery of materials protected by Federal Rule of Criminal Procedure 6(e). The United States also requests permission to provide in discovery sealed materials, pursuant to the previously entered protective order governing discovery. Finally, the United States requests that any order granting this motion be made applicable to co-defendants who may later be joined.

The United States conferred with counsel for the defendants regarding this motion, and counsel for defendants Caldwell, Crowl, Watkins, Sandra Parker, Bennie Parker, Steele, Minuta,


Isaacs, Walden, and Ulrich had no objection to this motion. Counsel for Kelly Meggs, Connie Meggs, Harrelson, James, Hackett, and Moerschel had not responded as of the time of filing of this motion.

WHEREFORE, the United States respectfully requests an order authorizing the disclosure in discovery of the materials described above.

Respectfully submitted,

CHANNING D. PHILLIPS  
Acting United States Attorney  
DC Bar No. 415793

By:

  
\_\_\_\_\_  
Kathryn L. Rakoczy  
Assistant United States Attorney  
D.C. Bar No. 994559  
Ahmed M. Baset  
Troy A. Edwards, Jr.  
Jeffrey S. Nestler  
Assistant United States Attorneys  
Louis Manzo  
Special Assistant United States Attorney  
U.S. Attorney's Office for the District of Columbia  
555 4th Street, N.W.  
Washington, D.C. 20530

/s/ Alexandra Hughes  
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Alexandra Hughes  
Justin Sher  
Trial Attorneys  
National Security Division  
United States Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004