

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

UNITED STATES OF AMERICA	:	Case No. 21-CR-84 (PLF)
	:	
v.	:	
	:	
DANIEL PAGE ADAMS and	:	
CODY PAGE CARTER CONNELL,	:	
	:	
Defendant.	:	

BILL OF PARTICULARS

The government files this Bill of Particulars in response to the Court’s June 30, 2023, Order granting the defendant’s motion for a Bill of Particulars as to Counts One and Three. ECF 86.

Defendants Daniel Paige Adams and Cody Connell are charged in this case with multiple felonies and misdemeanors: 18 U.S.C. § 231(a)(3) (Civil Disorder); 18 U.S.C. §§ 1512(c)(2) and 2 (Obstruction of Congress); 18 U.S.C. § 111(a)(1) (Assaulting Federal Officers); 18 U.S.C. § 1752(a)(1) (Entering and Remaining in a Restricted Building); 18 U.S.C. § 1752(a)(1) and (2) (Disorderly and Disruptive Conduct in a Restricted Building); 40 U.S.C. § 5104(e)(2)(D) (Violent Entry and Disorderly Conduct in a Capitol Building); 40 U.S.C. § 5104(e)(2)(E) (Impeding Passage Through the Capitol Grounds); and 40 U.S.C. § 5104(e)(2)(G) (Parading, Demonstrating, or Picketing in a Capitol Building).

On April 3, 2023, the defendants moved for a bill of particulars—specifically seeking “the identity of the law enforcement officer or officers” subject to the defendants’ alleged civil disorder in Count One and assault in Count Three. ECF 78. The Court granted that motion, over government objection.

In compliance with the Court’s order, however, the government provides the following information as to Counts One and Three:

- As to Count One, charging both defendants with 18 U.S.C. § 231(a)(3), the defendants are alleged to have obstructed, impeded, or interfered with United States Capitol Police officers J.G., T.M., B.S., B.M., and J.D. in and around the stairs near the Upper West Terrace of the United States Capitol at or around 2:10 p.m. on January 6, 2021. The defendants, through counsel, are aware of the identities of these officers.
- As to Count Three, charging both defendants with 18 U.S.C. § 111(a)(1), both defendants are alleged to have assaulted, resisted, impeded, intimidated, or interfered with United States Capitol Police officers J.G., T.M., B.S., B.M., and J.D. in and around the stairs near the Upper West Terrace of the United States Capitol at or around 2:10 p.m. on January 6, 2021. The defendants, through counsel, are aware of the identities of these officers.

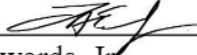
This information was provided in discovery in May and July of 2021 in the form of FBI 302 interview reports with the full names and departments of all five officers and was re-provided to the defendants on July 7, 2023, in response to the Court's order granting the defendants' motion for a bill of particulars.

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Respectfully submitted,

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By:



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