## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

:

**v.** 

: Case No. 21-cr-88 (DLF)

RONALD SANDLIN and :

NATHANIEL DEGRAVE,

:

**Defendants.** :

## NOTICE UNDER LOCAL CRIMINAL RULE 57.12B3 OF RELATED CASES

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully files notice, pursuant to Local Criminal Rule 57.12b3, that *United States v. Ronald Sandlin & Nathaniel DeGrave*, No. 21-cr-88 (DLF) and *United States. v. Josiah Colt.*, No. 21-cr-74 (TFH) are related cases.

As set forth in the pleadings in both cases as well as the defendants' respective plea/cooperation agreements, <sup>1</sup> the three above-mentioned defendants conspired to bring weapons and protective gear to the Washington, DC area in advance of the "Stop the Steal" rally on January 6, 2021, intending to interfere with the peaceful transition of power. They traveled from Tennessee to Washington, DC on January 5, 2021, and stayed in a hotel together. The defendants then traveled to the Capitol on January 6, 2021, with knives and bear mace in tow, and breached the Capitol building through the Upper West Terrace doors together. Defendants Sandlin and DeGrave assaulted multiple law enforcement officers in the Capitol while defendant Colt filmed the events. The three then breached the Senate Gallery together, where defendant Colt jumped to the Senate floor, with defendants Sandlin and DeGrave recording and cheering him on.

<sup>&</sup>lt;sup>1</sup> All three defendants have pleaded guilty pursuant to plea/cooperation agreements.

Accordingly, because the primary criminal conduct alleged against these individuals overlaps both temporally and geographically, and the evidence to be used against them at sentencing is virtually identical, the government files this belated notice to have these cases deemed related.<sup>2</sup>

Due to Judge Hogan's pending retirement, the parties understand that, if the cases are in fact deemed related, the *Colt* matter likely will be reassigned to Judge Friedrich for sentencing.

Respectfully submitted,

MATTHEW M. GRAVES United States Attorney D.C. Bar No. 481052

By: /s/ Jessica Arco

Jessica Arco Trial Attorney - Detailee D.C. Bar No. 1035204 601 D Street NW Washington, DC 20530 Jessica.arco@usdoj.gov (202) 514-3204

<sup>&</sup>lt;sup>2</sup> Due to a misunderstanding at the outset of these cases, the government failed to file a Notice of Related Cases earlier in the proceedings. Specifically, by the time the government sought a superseding indictment joining defendants Sandlin and DeGrave in a single case, defendant Colt had already pleaded guilty to Count One of his indictment and therefore would not be superseded and joined with the other two defendants.