

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

UNITED STATES)	
)	
v.)	Case No. 1:21-cr-117-1
)	
RYAN NICHOLS)	
_____)	

NOTICE OF FILING

Undersigned counsel hereby provides this notice of filing of the declaration of attorney Joseph McBride.

Dated: December 22, 2022
Baltimore, MD

/s/ Jonathan Gross
Jonathan Gross
2833 Smith Ave, Suite 331
Baltimore, MD 21209
(443) 813-0141
jon@clevengerfirm.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being served on opposing counsel via email on

December 23, 2022

/s/ Joseph D. McBride, Esq.
Joseph D. McBride, Esq.

DECLARATION OF ATTORNEY JOSEPH MCBRIDE

1. My name is Joseph D. McBride, Esq.
2. Today is December 22, 2022.
3. I represent Ryan Taylor Nichols.
4. December 6th is Ryan Nichols's birthday.
5. Mr. Nichols is an Honorably Discharged Marine Corps veteran.
6. November 10th is the Marine Corps birthday.
7. Mr. Nichols was granted pretrial release on November 10, 2022.
8. Mr. Nichols was released from pretrial detention on November 22, 2022.
9. At my direction, several attorney pictures and videos were taken of Mr. Nichols' release after his release, such as:
 - a. Mr. Nichols embracing his wife and mother for the first time in almost two years after he was released from Rappahannock Regional Jail.
 - b. Government agents harassing Mr. Nichols on the flights home, including multiple unnecessary searches.
 - c. What appears to be an F15 fighter jet escorting Mr. Nichols's flight from Dallas Fort Worth Airport to East Texas Regional Airport.
 - d. Police vehicles pulling next Mr. Nichols' plane after it landed.
 - e. The moment Mr. Nichols embraced his kids after almost two years of incarceration.
 - f. A video of the Nichols family at Thanksgiving dinner.
 - g. A video of Mr. Nichols clothed adequately in his bed where he expresses gratitude for being home with his family.
10. I tweeted the video of Mr. Nichols clothed adequately in his bed several weeks after it was taken on December 6, 2022, which is Mr. Nichols' birthday.
11. The initial video was a private joke between an attorney and his client.
12. The specific intention of my tweet was to say happy birthday to Mr. Nichols.

13. My tweet was a twenty-second clip of a more extensive video with the following caption:

“Today is Ryan Nichol’s 32nd birthday! Ryan is not allowed on the internet. Even so, please join me in wishing this Heroic Marine Corps Veteran a VERY HAPPY BIRTHDAY. #SemperFi.” The message was followed by six American flag emojis, and a “fistbump” emoji.

14. The tweet is clearly a birthday message, not an advertisement.

15. Mr. Nichols had no previous knowledge that the video would be disseminated when it was taken.

16. Mrs. Nichols had no previous knowledge that the video would be disseminated when it was taken.

17. Mr. Nichols did not do anything violative of a court order or instruction.

18. Mrs. Nichols did not do anything violative of a court order or instruction.

19. My decision to post the video does not violate any court order or instruction.

20. I became aware that this Honorable Court was displeased with my decision to tweet said video after the last status conference.

21. I have since taken the video down out of respect for the court, not because I believe I have done anything wrong.

Dated: December 22, 2022

/s/ Joseph D. McBride, Esq.
THE MCBRIDE LAW FIRM, PLLC
99 Park Avenue
6th Floor
New York, NY 10016
p: (917) 757-9537
e: jmcbride@mcbridelawny.com