



THE MCBRIDE LAW FIRM, PLLC

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February 27, 2023

Via Email

Douglas Burton Brasher
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Dallas, TX 75242
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Sarah Wilson Rocha
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DOJ-CRM 219 S. Dearborn Street 5th Floor
Chicago, IL 60604
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Re: Rule 16 Discovery Request

United States v. Ryan Nichols, Case No. 21-0117

Dear Mr. Brasher and Ms. Rocha:

Pursuant to the Government's discovery obligations under Rule 16 of the Federal Rules of Criminal Procedure, the Jencks Act, Federal Rule of Evidence 404(b), Title 9 of the Justice Manual, and the Brady/Giglo line of cases, we make the following discovery requests:

Request that you provide the following discovery by March 1, 2023:

1. All transcripts from the grand jury proceedings.
2. January 6th Select Committee investigation depositions, closed hearing transcripts, informal interviews, and interview notes for anyone the committee stated it has taken testimony from under oath or likewise interviewed.
3. All the Ray Epps material from the January 6 Select Committee the FBI and other federal investigative agency. This includes any information about his contacts or material support from investigative agencies or their proxies as well as information about the eight (8) individuals in the extraction stack that removed Ray Epps from in front of the inaugural stage on January 6. <https://youtu.be/M-k4IY9STcA>

4. We require any information on the following individuals who have been identified and charged since the Summer, 2022. This would include pretrial services and probation files:

William Dunfee –Arrested 10/5/22 (ECF 225-2 p.33; #PasterBill) 1:22-mj-00217-MAU;

Israel James Easterday – Arrested 12/15/22 (225-3 p. 36 a/k/a #JamesDeanWannabe) 1:22-mj-00264-ZMF;

Daniel Leyden– Arrested 8/22/22 (225-2 p.43– a/k/a #TealScrambler) 1:22-mj-00180-RMM

Kaleb Dillard– Arrested 8/23/22 (225-3 p. 46- #Smokey Insider) 2:22-mj-00341-NAD

Megan Paradise (at large)

Zachary Johnson a/k/a #GogglesMan

#PippiLongscarf (unknown)

- a. Daniel Donovan (“#RedFace45,” “Rally Runner”)

#David Dempsey

Ashley Ray Davis

Jake Lang 21-cr-58 <https://www.justice.gov/usao-dc/defendants/lang-edward-jacob>

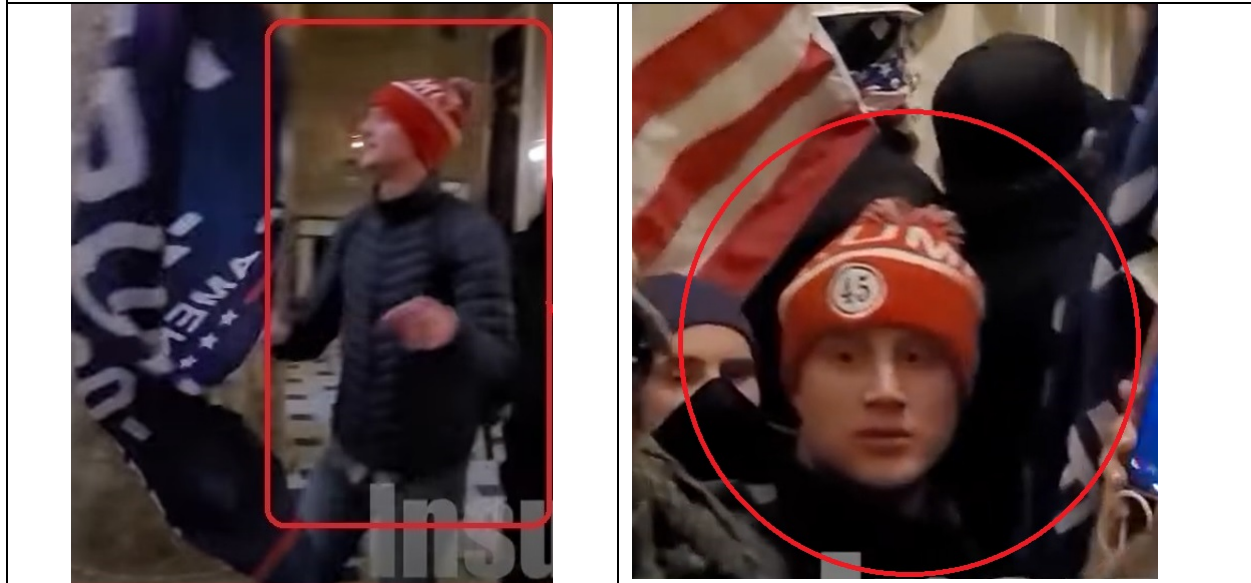
Marcus DiPaola

In addition we require any information the government has on:

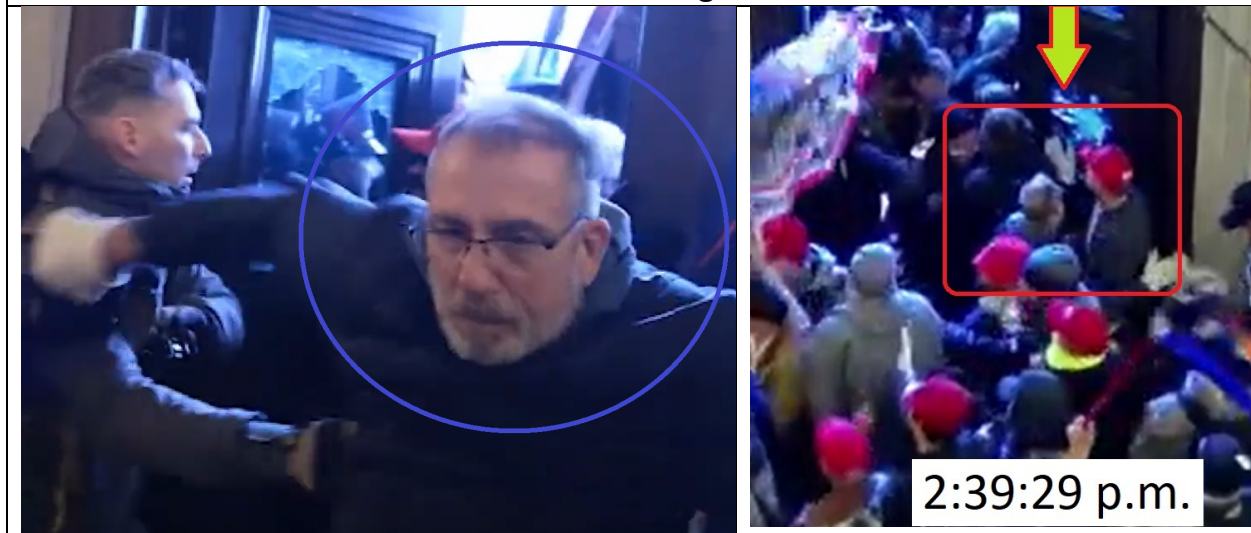
James Randall Taylor a/k/a “1%Watchdog” whose last known address is 13780 Lisa Way Red Bluff, CA 96080.

5. We require any information concerning the following unidentified three people two of whom have Sedition Hunters screen names: “Freshman Flagger” (person 1) and #RotundaRoamer (person 2) :

Person 1



Person 2 Who is Wearing White Gloves



Note: The right-most image was recorded at the Columbus Doors at approximately 2:39:22 p.m.

Person 3



6. Any and all information regarding how Ryan Nichols and/or Alex Harkrider impacted or affected the cessation of college certification between 12:47 p.m. and 2:29 p.m. (when Vice President Pence was evacuated) and how Ryan Nichols and/or Alex Harkrider impacted resumption of college certification proceedings at 9:00 p.m.
7. Disclosure of all information referring or reflecting barricades and “area closed” signs at 2:45 p.m.
8. To the extent not already provided all information disclosed, provided by, or secured on behalf of the January 6 Select Committee.
9. All formation documents and organization charts and staffing lists regarding the formation and operations of the Capitol Siege Production Unit. All communications between the Capitol Siege Production Unit and the January 6 Select Committee.
10. Bodycam of Officer Mustafa Ak from 3:55 to 4:05 pm.

The above-mentioned requests are made in good faith. We believe that each one of these requests contains a combination of relevant, exculpatory, and highly probative evidence related to multiple charges.

While recognizing that these requests require coordination between your office and prosecution team members, such as the Federal Bureau of Investigation and its affiliates, the United States Capitol Police and its affiliates, the D.C. Metropolitan Police and its affiliates, and the Central Intelligence Agency and its affiliates, we respectfully ask that these requests be fulfilled by March 1, 2023.

Thank you for your time and attention to this matter. I can be reached by phone or text at (917) 757-9537, or by email at jmcbride@mcbritelawny.com.

Dated: New York, NY
February 27, 2023

Respectfully submitted,

/s/ Joseph D. McBride, Esq.

Bar ID: NY0403

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