

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

RYAN TAYLOR NICHOLS,
Defendant.

Case No. 21-cr-00117 (RCL)

DEFENDANT’S MOTION FOR LEAVE TO FILE UNDER SEAL
EXHIBIT A TO HIS MOTION FOR A CONTINUANCE

Ryan Taylor Nichols, by undersigned counsel, respectfully moves this Court for the entry of an Order granting him the right to file under seal medical records relevant to his SUPPLEMENTAL MOTION TO CONTINUE (ECF No. 224) in accordance with this Honorable Court’s March 17, 2023, ORDER (ECF No. 227) and the procedures outlined in Local Rule 5.4

Mr. Nichols is a thirty-one-year-old United States Marine Corps Veteran from the State of Texas. He protested at the United States Capitol on January 6, 2021. The Federal Government conducted a predawn raid on his home on January 18, 2021. The Government pulled a tank onto his front lawn, pointed the turret at his front door, kicked in the front door, and stormed the Nichols home with dozens of armed agents. Fortuitously, Mr. Nichols was not home with his wife and two young sons when his door came off its hinges. A few hours later, Mr. Nichols self-surrendered to the FBI and remained in federal custody from January 18, 2021 – November 22, 2022. Mr. Nichols was taken into federal custody with two underlying severe medical conditions Diverticular Disease and Post Traumatic Stress Disorder. Mr. Nichols’ recent lab results indicate that he is now at high risk for active liver disease, which is profoundly distressing. Medical testing and evaluation are ongoing. Meaningful treatment has not even begun. One thing is sure, Mr. Nichols is not physically or psychologically well enough to endure the demands of a trial currently.

It should be noted that Mr. Nichols is in the process of switching physicians. It appears that the previous physician was intimidated by the Federal Government's intrusion into the doctor-patient relationship, causing discomfort to the point where meaningful treatment and education became unnecessarily complicated. As such, we respectfully ask that the United States Government be removed from the doctor-patient relationship during the pendency of Mr. Nichols' pre-trial release.

Dated: New York, NY
March 20, 2023

Respectfully submitted,

/s/ Joseph D. McBride, Esq.

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