

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

UNITED STATES OF AMERICA,	:	CRIMINAL NO. 1:22-CR-15
Plaintiff	:	
	:	(JUDGE MEHTA)
v.	:	
	:	
JESSICA WATKINS,	:	
THOMAS E. CALDWELL,	:	
KENNETH HARRELSON,	:	
KELLY MEGGS	:	
	:	
Defendants	:	

MOTION FOR A BILL OF PARTICULARS

NOW COMES THE DEFENDANTS, by their Counsel, having been indicted by a Grand Jury of this Court, and, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure, move this Honorable Court to order the Assistant United States Attorneys to furnish the defendant with a written Bill of Particulars in numbered paragraphs, corresponding with the numbered paragraphs hereinafter to provide the information requested, and as grounds for such Motion, Defendants assert that the information requested in such Motion for a Bill of Particulars is necessary so they may know with what conspiratorial act or conspiratorial acts they are alleged to have committed or are charged with having committed, to prepare for trial, and to avoid prejudicial surprise and to focus the Court and

individual attorneys on those issues presented at trial as to each witness.

At the hearing on 14 September 2022, while discussing the Defendant Watkins's communications over Zello, the Government asserted Defendant Watkins (and potentially others) was allegedly part of a second (or potentially third) conspiracy, the existence of which was heretofore previously unknown by the Defendants and the substance of which is still unknown.

The Defendants believe it is in the interest of judicial economy, notice, due process and double jeopardy concerns (*See United States v. Birmley*, 529 F.2d 103, 108 (6th Cir. 1976)) and to avoid unnecessary confusion of the jury to better focus cross-examination. The particulars required by Defendants are as follows:

1. Any and all communications the Defendants are alleged to have made that the Government intends to seek admission at trial that do not relate to the conspiracies charged in the indictment dated 22 June 2022.
2. Any and all acts the Defendants are alleged to have committed that the Government intends to seek admission at trial that do not relate to the conspiracies charged in the indictment dated 22 June 2022.
3. Any and all communications made by indicted or unindicted co-conspirators that the Government intends to seek admission at trial that do not relate to the conspiracies charged in the indictment dated 22 June 2022.

4. Any and all acts alleged to have been committed by indicted or unindicted co-conspirators that the Government intends to seek admission at trial that do not relate to the conspiracies charged in the indictment dated 22 June 2022.

Respectfully Submitted,

Dated: 21 September 2022

/s/Jonathan W. Crisp
Jonathan W. Crisp, Esquire
4031 North Front St.
Harrisburg, PA 17110
I.D. # 83505
(717) 412-4676
jcrisp@crisplegal.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on the individuals listed below:

ELECTRONIC SERVICE

Kathryn Rakoczy, Esquire
Assistant United States Attorney
U.S. Attorney's Office for the District of Columbia
555 Fourth Street, NW
Washington, DC 20530
Kathryn.Rakoczy@usdoj.gov

Jeffrey S. Nestler, Esquire
Assistant United States Attorney
U.S. Attorney's Office for the District of Columbia
555 Fourth Street, NW
Washington, DC 20530
Jeffrey.nestler@usdoj.gov

Date: 21 September 2022

/s/ Jonathan W. Crisp
Jonathan W. Crisp, Esquire
4031 North Front St.
Harrisburg, PA 17110
I.D. # 83505
(717) 412-4676
jcrisp@crisplegal.com
Attorney for Defendant