

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

UNITED STATES OF AMERICA

v.

**SANDRA PARKER,
BENNIE PARKER,
LAURA STEELE,
CONNIE MEGGS,
WILLIAM ISAACS, and
MICHAEL GREENE**

Defendants.

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Case No. 21-cr-28 (APM)

**GOVERNMENT’S NOTICE REGARDING EXHIBITS FORMALLY MOVED INTO
EVIDENCE AT THE CONCLUSION OF THE GOVERNMENT’S CASE AT TRIAL**

On March 10, 2023, the government notified the Court and counsel of the following items of evidence that the government had either inadvertently forgotten to move into evidence when the exhibits were identified and/or published during trial, or that were admitted but the record failed to capture their admission:

- 192.V.1.1 (the Court ruled this exhibit was admissible and it was published to the jury, but the record is not clear that the Court formally admitted the exhibit);
- 1050.2.E.SS (this exhibit was inadvertently read into the record as Exhibit 1050.2.E);
- 1518 (the Court ruled this exhibit was admissible and it was published to the jury, but the record is not clear that the Court formally admitted the exhibit);
- 2030.P.2 (the Court ruled this exhibit was admissible and it was published to the jury, but the record is not clear that the Court formally admitted the exhibit);
- 3100.2 (this stipulation was read into the record but was not formally admitted);
- 3501.16 (this exhibit was inadvertently read into the record as Exhibit 3501.60);
- 4802.1.4 (this exhibit was inadvertently read into the record as Exhibit 4802.14);

- 5722.4 - 5722.5 [this exhibit was admitted as 5722 (the entire transcript), and the government has marked the admitted portion as 5722.4 - 5722.5];
- 8001 (the Court ruled this exhibit was admissible and it was published to the jury, but the record is not clear that the Court formally admitted the exhibit);
- 9230 (this exhibit was inadvertently read into the record as Exhibit 9320 and is missing from the transcript index);
- 9335.C (the Court ruled this exhibit was admissible and it was published to the jury, but the record is not clear that the Court formally admitted the exhibit);
- 9731 (the Court ruled this exhibit was admissible and it was published to the jury, but the record is not clear that the Court formally admitted the exhibit);
- 10027 (this exhibit was inadvertently read into the record as 1002.7 and the government added message numbers after its admission);
- 10030 (this exhibit was inadvertently read into the record as 1003.0 and the government added message numbers after its admission);
- 10150 (this exhibit was inadvertently read into the record as Exhibit 101.50);
- 10151 (this exhibit was inadvertently read into the record as Exhibit 101.51);
- 10152 (this exhibit was inadvertently read into the record as Exhibit 101.52);
- 10155.1116A (this exhibit was inadvertently read into the record as Exhibit 10155.116A);
- 10158.5 [this exhibit was admitted as 10158 (the entire report), and the government has marked the admitted portion as 10158.5];
- 10161 (this exhibit was inadvertently read into the record as 101.61);
- 10252 (all seven pages of this exhibit were admitted, but the record only reflects the admission of pages 2-7).

The government also made a correction to the date on message 85.T.1.2 in Exhibit 9739.

The government would also like to consolidate the following exhibits, which were inadvertently admitted under two different exhibit numbers:

- 1064.1.SS and 9951 (the Government has marked it 1064.1.SS);
- 1675 and 7026 (the Government has marked it 1675).

The following exhibits comprise the underlying cellphone provider records for Government Exhibits 6740A and 6742A:

- 2406.1 (Excerpt of Kelly Meggs' Phone Records);
- 2409.2 (Excerpt of Stewart Rhodes' Phone Records);
- 2412.4 (Excerpt of Roberto Minuta's Phone Records);
- 2424.1 (Excerpt of Joshua James' Phone Records);
- 2425.2 (Excerpt of Michael Greene's Phone Records);
- 2428.1 (Excerpt of Kellye SoRelle's Phone Records).

The government would also like to note that the following admitted exhibits were omitted from the transcript indices:

- 22.T.27.2883;
- 1050.1.E.3;
- 9729;
- 9732.

Finally, at the close of its case, the government formally moved the following component parts of its media compilation exhibits into evidence:

Government Exhibit 1500.4

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| • 29.V.1 | • 1056.0933.0310 | • 5707 |
| • 22.P.1 | • 1056.0933.0316 | • 9335 |
| • 192.V.1 | • 1056.7029.0238 | • 1.S.159.1057.A |
| • 53.P.2 | • 1056.7029.0239 | • 22.P.2 |
| • 1072.2 | • 1056.7029.0314 | • 22.P.3 |

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| • 1072.1 | • 1056.7029.0321 | • 29.V.2 |
| • 200.P.1 | • 1056.7205.0152 | • 53.P.1 |
| • 1050 | • 1082.1 | • 53.P.3 |
| • 1056.0603.0224 | • 1082.2 | • 53.P.4 |
| • 1056.0613.0224 | • 1087.1 | • 53.P.6 |
| • 1056.0761.0229 | • 2004.V.1 | • 135.V.1 |
| • 1056.0902.0220 | • 2521.1 | • 192.V.2 |
| • 1056.0908.0235 | • 5305 | |
| • 1056.0926.0226 | • 5306 | |

Government Exhibit 1503.1 [FULL]

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|------------------|----------|------------|
| • 73.V.3 | • 1077.2 | • 1096.1 |
| • 135.V.1 | • 1077.3 | • 1096.2 |
| • 192.V.3 | • 1078.3 | • 1096.3 |
| • 1050.1 | • 1082.1 | • 1097.1 |
| • 1051.1 | • 1082.2 | • 1104.1 |
| • 1056.0902.0220 | • 1082.3 | • 5300.V.1 |
| • 1056.0932.0159 | • 1083.1 | • 5300.V.2 |
| • 1056.7029.0239 | • 1083.2 | • 7077.1 |
| • 1056.7205.0152 | • 1083.3 | |
| • 1077.1 | • 1085.1 | |

Government Exhibit 1504

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|-----------|----------|----------|
| • 1098.9 | • 1073.1 | • 1098.2 |
| • 1098.1 | • 1077.4 | • 1098.3 |
| • 1098.11 | • 1078.1 | • 1098.4 |
| • 1098.12 | • 1078.3 | • 1098.5 |
| • 1098.13 | • 1085.2 | • 1098.6 |
| • 2521.2 | • 1096.3 | • 1098.7 |
| • 73.V.3 | • 1097.1 | • 1098.8 |
| • 200.V.1 | • 1098.1 | |

Government Exhibit 1505

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|-------------------|-----------|-----------|
| • 1077.5 | • 1078.1 | • 1098.15 |
| • 1077.6.A | • 1079.1 | • 1098.16 |
| • 1077.1 | • 1079.2 | • 1098.17 |
| • 1077.11 | • 1079.3 | • 1098.18 |
| • 1077.6, 1077.6A | • 1091.1 | • 1098.19 |
| • 1077.7 | • 1091.2 | • 1099.2 |
| • 1077.8 | • 1091.3 | • 1102.1 |
| • 1077.9 | • 1098.14 | • 8000.1 |

Government Exhibit 1508

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|------------------|-----------|------------|
| • 111.V.1 | • 1077.18 | • 1100 |
| • 1056.0933.0310 | • 1087.1 | • 1120 |
| • 1056.0933.0336 | • 1088.1 | • 1123.4 |
| • 1056.7029.0314 | • 1089.1 | • 2004.V.1 |
| • 1056.7029.0335 | • 1089.2 | • 2004.V.2 |
| • 1077.14 | • 1089.3 | |

Government Exhibit 1515.1

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| • 1056.0264.0241
and 1056.0267.0241 | • 1056.0932.0159 | • 1056.7216.0225
and 1056.7029.0226 |
| | • 1056.0933.0206 | |
| • 1056.0303.0242 | • 1056.0944.1258 | • 1056.0102.0212 |
| • 1056.0403.0225 | • 1056.3187.1251 | • 1056.0102.0248 |
| • 1056.0462.0301 | • 1056.7029.0236.A | • 1056.0117.0218
and 1056.7029.0226 |
| • 1056.0514.1257 | • 1056.7029.0236.B | |
| • 1056.0903.0214 | • 1056.7029.0314 | • 1056.0153.0228 |
| • 1056.0903.0233 | • 1056.7029.0321 | • 1056.0171.0226 |
| • 1056.0925.0209 | • 1056.7029.0328 | • 1056.0251.0235 |
| • 1056.0926.0211 | • 1056.7206.0229 | • 1060.0244 |

Government Exhibit 1518

- 1055.FD.0105.0102
- 1055.FD.0105.0115
- 1055.FD.0105.0154
- 1055.FD.0105.0505
- 1055.SFE.0105.0254
- 1055.SFE.0105.0506
- 1055.SFE.0106.0215
- 1055.SFE.0106.0531
- 1055.SFE.0106.0800
- 1055.SFE.0106.0815
- 1055.SFE.0106.0823
- 1055.SFE.0106.0836
- 1055.SFE.0106.1112
- 1055.SFE.0106.1121
- 1055.SFE.0107.0720
- 1055.SFE.0107.0752
- 1055.SFE.0107.0907
- 1055.SFE.0107.1100
- 1055.SFL.0105.0155
- 1055.SFL.0105.0254
- 1055.SFL.0106.0815
- 1055.SFL.0107.0935
- 1518 Intro

WHEREFORE, the United States respectfully requests that the record reflect the admission of the above-listed items of evidence during the government's case at trial.

Respectfully submitted,

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