IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA	
UNITED STATES OF AMERICA, Plaintiff, vs. THOMAS E. CALDWELL, ET AL., Defendant.)))) (CR No. 21-28) (Washington, D.C.) (April 6, 2021) (4:05 p.m.))))
TRANSCRIPT OF STATUS CONFERENCE VIA ZOOM PROCEEDINGS BEFORE THE HONORABLE AMIT P. MEHTA UNITED STATES DISTRICT JUDGE APPEARANCES:	
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Proceedings recorded by mechanical stenography; transcript produced by computer-aided transcription

PROCEEDINGS 1 2 COURTROOM DEPUTY: Good afternoon, Your Honor. 3 This is Criminal Case No. 21-28, the United States of 4 America versus Defendant No. 1, Thomas Edward Caldwell; 5 Defendant No. 2, Donovan Crowl; Defendant No. 3, 6 Jessica Marie Watkins; Defendant No. 4, Sandra Ruth Parker; 7 Defendant No. 5, Bennie Alvin Parker; Defendant No. 6, 8 Graydon Young; Defendant No. 7, Laura Steele; Defendant 8, Kelly Meggs; Defendant 9, Connie Meggs; Defendant 10, 9 10 Kenneth Harrelson; Defendant 11, Roberto A. Minuta; and 11 Defendant 12, Joshua James. 12 Kathryn Rakoczy will be speaking on behalf of the 1.3 government. David Fischer for Defendant Caldwell. 14 Carmen Hernandez for Defendant Crowl. 15 Michelle Peterson for Defendant Watkins. 16 17 John Machado for Defendant Sandra Parker. 18 Stephen Brennwald for Defendant Bennie Parker. 19 Desiree Wilson and Robert Foley for Defendant 20 Young. 21 Peter Cooper for Defendant Steele. 22 David Wilson on behalf of Defendants Kelly Meggs 23 and Connie Meggs. 24 Nina Ginsberg and Jeffrey Zimmerman on behalf of 25 Defendant Kenneth Harrelson.

Jenifer Wicks on behalf of Defendant Roberto 1 2 Minuta. 3 And Joni Robin and Chris Leibig on behalf of Defendant James. 4 5 All defendants are present either via 6 videoconference or teleconference for this matter. 7 THE COURT: Okay, Counsel. Good afternoon to all 8 And to all the defendants in the case, good 9 afternoon to all of you. I won't go through everybody's 10 names, we've got quite a few people, but good afternoon to 11 everyone. 12 All right. So we're here for a status hearing. 13 We actually have managed to get all 12 defendants present 14 and here for this status hearing, which is no small feat. But we've done that. 15 16 So let's talk about what we want to get 17 accomplished this afternoon. I've got a small -- a short 18 agenda, and obviously, to the extent either side wants to 19 supplement it, you should do that. 20 But let me just sort of preview what I had in 21 mind. I wanted to -- we've got a third superseding 22 indictment that needs to be addressed. There are, by our 23 count, four defendants that still need to be arraigned, so 24 we'll take care of that. 25 After that, we'll get an update from the

government about where things stand in the case in terms of discovery and talk about the speedy trial motion.

There are a couple of defendants who have detention issues that they've either raised or will soon be raising, and we'll just talk about that briefly.

And then there are just a couple of housekeeping matters I want to address before we conclude.

So let's start with the third superseding indictment. And I don't intend to have every single defendant re-arraigned, because the vast majority of defendants, and, in fact, I think all the defendants, in the second superseding indictment, there are no new charges in the third superseding indictment, there's simply the addition of new defendants.

So unless any defense counsel objects, and if you do so, say your piece now, I do not intend to re-arraign your client if you've simply been named in the third superseding indictment but there have been no new charges brought against your client.

Okay. So hearing no defense counsel object to that approach, let me then turn to the third superseding indictment in arraigning, at least by our count, the four defendants who have yet to be arraigned, and they are Connie Meggs, Kenneth Harrelson, Robert Minuta and Joshua James, the last three of which are sort of the newest additions to

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this case.
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 2
               So why don't we start with Connie Meggs. And,
 3
    Mr. Wilson, I'll just ask you and your client to pay
 4
     attention, we may have just neglected to do this when we had
 5
     her detention hearing, so I'll just ask you and Ms. Meggs to
 6
    pay attention to the Courtroom Deputy as he announces the
 7
     charges against Ms. Meggs.
               COURTROOM DEPUTY: May the record reflect that the
 8
     defendant, through counsel, has received a copy of the third
 9
10
     superseding indictment.
11
               Ms. Meggs, in Criminal Case No. 21-28-9, you have
     been charged with the following counts:
12
13
               Count 1, conspiracy, in violation of Title 18
14
     United States Code Section 371;
15
               Count 2, obstruction of an official proceeding and
16
     aiding and abetting, in violation of Title 18 United States
17
     Code Sections 1512(c)(2) and Section 2;
18
               Count 3, destruction of government property and
19
     aiding and abetting, in violation of Title 18 United States
20
     Code Sections 1361 and Section 2;
21
               And Count 4, restricted building or grounds, in
22
     violation of Title 18 United States Code Section 1752(a)(1).
23
               Do you wish to waive the formal reading of the
24
     third superseding indictment and how do you wish to plead?
25
               MR. FISCHER: Yes, we'll waive the reading and
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enter a plea of not guilty.
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 2
               THE COURT: So I'll have the record reflect an
     entry of not-guilty pleas as to each count with which
 3
 4
    Mr. Meggs has been charged.
 5
               So let's turn, then, to Mr. Harrelson.
 6
               COURTROOM DEPUTY: Mr. Harrelson -- may the record
     reflect that the defendant, through counsel, has received a
 7
 8
     copy of the third superseding indictment.
               Mr. Harrelson, in Criminal Case No. 21-28-10,
 9
10
     you've been charged with the following counts:
11
               Count 1, conspiracy, in violation of Title 18
     United States Code Section 371;
12
               Count 2, obstruction of an official proceeding and
13
14
     aiding and abetting, in violation of Title 18 United States
     Code Sections 1512(c)(2) and Section 2;
15
16
               Count 3, destruction of government property and
17
     aiding and abetting, in violation of Title 18 United States
18
     Code Sections 1361 and Section 2;
19
               And Count 4, restricted building or grounds, in
20
     violation of Title 18 United States Code Section 1752(a)(1).
21
               Do you wish to waive the formal reading of the
22
     third superseding indictment, and how do you wish to plead?
23
               MS. GINSBERG: Your Honor, Mr. Harrelson waives
24
     formal reading, he enters pleas of not guilty, and requests
25
     trial by jury.
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THE COURT: All right. Thank you, Ms. Ginsberg.
 1
 2
               All right. We'll turn, then, to Mr. Minuta.
 3
               COURTROOM DEPUTY: May the record reflect that
 4
     defendant, through counsel, has received a copy of the third
 5
     superseding indictment.
 6
               Mr. Minuta, in Criminal Case No. 21-28-11, you've
    been charged with the following counts:
 7
               Count 1, conspiracy, in violation of Title 18
 8
     United States Code Section 371;
 9
10
               Count 2, obstruction of an official proceeding and
     aiding and abetting, in violation of Title 18 United States
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12
     Code Sections 1512(c)(2) and Section 2;
13
               And Count 4, restricted building or grounds, in
14
     violation of Title 18 United States Code Section 1752(a)(1).
15
               Do you wish to waive the formal reading and how do
16
     you wish to plead?
17
               MS. WICKS: Yes, we waive a formal reading and
18
     enter a plea of not guilty to each count.
19
               THE COURT: All right. Thank you, Ms. Wicks.
20
               So not quilty -- entries of not-quilty pleas as to
21
     each of the counts with respect to Mr. Harrelson and
22
    Mr. Minuta will be reflected on the record.
               And then finally Mr. James.
23
24
               COURTROOM DEPUTY: And may the record reflect that
25
    Mr. James, through counsel, has received a copy of the third
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superseding indictment.
 1
 2
               Mr. James, in Criminal Case No. 21-28-12, you've
 3
     been charged with the following counts:
 4
               Count 1, conspiracy, in violation of Title 18
 5
     United States Code Section 371;
 6
               Count 2, obstruction of an official proceeding and
 7
     aiding and abetting, in violation of Title 18 United States
     Code Sections 1512(c)(2) and Section 2;
 8
 9
               And Count 4, restricted building or grounds, in
10
     violation of Title 18 United States Code Section 1752(a)(1).
11
               Do you wish to waive the formal reading and how do
12
     you wish to plea?
1.3
               MS. ROBIN: Good afternoon, Your Honor.
               Joni Robin on behalf of Mr. James.
14
15
               Mr. James waives formal reading and enters plea of
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     not guilty to each of the counts charged.
17
               THE COURT: All right. Thank you, Ms. Robin.
18
               So the record will reflect the entry of not-quilty
19
     pleas as to each count against Mr. James.
20
               Okay. So that takes care of the preliminaries
21
     with respect to arraignments and the third superseding
2.2.
     indictment.
23
               Let's turn next to Ms. Rakoczy and the government
     with respect to an update.
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               Before we hear from Ms. Rakoczy, let me just say
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that I have -- I'm aware, of course, that there is a pending 1 2 motion with respect to speedy trial and the exclusion of 3 60 days that the government filed. Some of the defendants 4 have filed oppositions to that motion. 5 I didn't rule on the motion simply because at 6 least the defendants, up until today or up until through, 7 I think, the second superseding indictment, almost all of 8 them had agreed to toll time through today, so we weren't --9 I wasn't too worried about where things stood. And plus, 10 with the addition of new defendants, we arguably are 11 re-starting the clock in any event. 12 But with that said, I'm aware of the motion, and 13 part of the reason I haven't ruled on it is I also wanted to 14 hear from the government about where things stood and what 15 more it thought it needed to do in terms of making 16 disclosures. 17 So with that, let's turn things over to 18 Ms. Rakoczy. 19 MS. RAKOCZY: Yes, Your Honor. Thank you. 20 The government has provided, over the first two 21 months or so of this investigation, informal discovery on a 22 rolling basis to counsel as they entered their appearance 23 after their clients were charged in this matter. 24 To date, as we described in our pleadings on the

complex case motion, we've provided roughly about 35

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gigabytes of data, maybe a little bit more at this point, because we have provided some additional materials as some new defendants entered their appearance through counsel in this case.

We are prepared to provide a next round of discovery that we hope to provide either by the end of this week or early next week. This next round of discovery will consist of mostly subpoena returns, probably approximately one-half to three-fifths of the subpoena returns that have been obtained so far in this investigation. We will continue and we are providing them on a rolling basis. And so the only reason that we aren't providing everything to date is that we are processing the data as it comes in and putting it in a Bates-stamped format that's easier to provide to the defense that can be indexed and clearly delineated for the defense. So as we take the next round of subpoena returns that have come in, we will get those out the door hopefully every few weeks on a rolling basis.

There are a number of search warrant returns in this matter, as we note in our pleadings, I think over 50 search warrant returns at this point in time, mostly for electronic devices, some residences as well.

We've provided a fair amount of the information already to counsel. With respect to the premises search warrants, we've provided a lot of the paperwork and the

photographs from those premises search warrants.

We've provided some of the defendants' electronic device search warrants returns. We hope to provide the remainder of those in the next few weeks. It is a voluminous amount of data, and so I need to coordinate with the defense counsel on the best way to get that to them, whether we put it all on one external hard drive. We do have an agreement with counsel, with the defendants through their counsel, where each defendant has agreed to provide the entirety of the search warrant return prior to it being completely scoped by the government so that we can get that out the door immediately to all defendants through their counsel.

We are going to designate those as highly sensitive, just because there is going to be material on there that would be private information for the defendants. And so the defendants will be able to review that data, they just won't be able to maintain a copy unless we work out some agreement with the defense attorneys about particular materials that may be important for them to have an actual copy of. But the goal here is to get it out the door as quickly as possible, while also maintaining the privacy of the defendants. So we hope to do that on a rolling basis over the next few weeks.

The investigation, obviously, is ongoing, so

discovery will continue to need to be produced through the close of the investigation, but we are providing -- we have provided a significant amount of discovery and will provide far more in the coming weeks.

And that is the major reason why we think it would be appropriate to not have our next status until approximately two months down the line so that the defense attorneys will have an opportunity to review the materials that we have provided and will provide and so that the government can continue the investigation of this matter.

THE COURT: Just for my own clarification and edification, when you're talking about subpoena returns, what do you mean? Are you talking about social-media or sort of third-party communication providers, that sort of thing?

MS. RAKOCZY: Sure.

Phone records, like call detail records and subscriber information, social media account information is obtainable by subpoena, some financial records, travel and lodging records that are relevant to the events of the 5th and the 6th, materials of that magnitude.

THE COURT: Okay.

So I think the question -- the million dollar question, Ms. Rakoczy, is: Does the government have a sense -- I mean, if we're thinking about a scheduling of

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motions and let alone a trial, I mean, when is the government estimating by when it thinks it would be able to sort of substantially complete discovery? I don't mean every single document, but in a position to say we've substantially completed our discovery obligations under Rule 16, let's leave aside Grand Jury material and the like. MS. RAKOCZY: That is -- I think for the defendants who are charged here, we hope that -- I think it's not unreasonable to say within the next 60 days, we would be able to turn over the bulk of the materials that are relevant to the defendants charged here. But this is an ongoing investigation and we do continue to apply for, obtain, and issue legal process, and so as the investigation continues, the discovery that needs to be turned over continues to build. And so we, as I said, have turned over quite a bit, and will continue to do so in the next few weeks. I think that setting two months or a little bit more than that is not an unreasonable expectation for turning over the legal process that we've obtained so far and the evidence that's been gathered through the search warrants thus far. I do think, though, that the investigation is ongoing, and so it's a little bit hard to say that in that two- to three-month period, that we would be at a point where everyone would be prepared to start setting a motions

schedule.

THE COURT: Well, I think -- let me first -- I recognize that the government's investigation is ongoing, you know, though that's not a talisman, ultimately, for not moving forward in these proceedings and setting a schedule beyond -- involving motions and ultimately a trial for those defendants who intend to move to trial.

And so what I'd really like to understand is that, at least with respect to what you have now, you know, and what you've accumulated now, is it realistic -- or let me put it differently -- will the government -- do you think the government, within 60 days, will have substantially completed the disclosure of Rule 16 material with respect to what it has gathered to date?

MS. RAKOCZY: I'm pretty comfortable, Your Honor, that with respect to the evidence that's been gathered through legal process for this case and for these defendants, that we could get the bulk of that, if not all of that, turned over in the next few months.

As I said, in addition to the ongoing investigation piece of this, there is a broader investigation. There were many, many people who were at this crime scene that day, and we are very aware of our obligations to look broadly beyond just the individual subjects or defendants who are at issue in this case.

And so I don't want to -- I want to be clear that I don't know that I can make sure that we have identified and looked at evidence of other defendants who may have been adjacent to the group that's being investigated in this case and made sure we've looked at the material from those cases and made any disclosures that need to be made, and that's part -- that was part of the reason underlying the motion that we filed to toll some time under the complex case grounds. Part of that was that this is a very broad investigation writ large, and so we do want to make sure we flag for the Court that we're aware of that and we're coming up. We've worked with some members of the Defense Bar to try to think about ways that we can make sure that all that evidence is gathered and reviewed and disclosed to the appropriate parties, but there is that piece of it as well.

THE COURT: Okay.

How about the issue of pleas, and where is the government in its thinking about possibly making plea offers to any and all of the people in this indictment?

MS. RAKOCZY: Your Honor, the members of this investigation team have definitely started conversations with our immediate supervisors about that topic. We are eager to be able to offer plea offers. Because this is a very broad investigation, we need to get approval even beyond our direct supervisors. And my understanding is that

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those conversations are happening at levels above my pay
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     grade, but I do hope that in the next few weeks, that
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     we will start to move on that.
               But it's not -- it's a decision that's a little
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 5
    bit beyond just myself and the other prosecutors on the
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     team, so I can't give you a precise date, but it's a
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     conversation that's begun and we're hopeful it's something
     that we'll be able to talk about in the next few weeks.
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               THE COURT: All right. Those would be my
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     questions, Ms. Rakoczy. Did you want to add anything else
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     to the discussion here this afternoon?
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               MS. RAKOCZY: No, Your Honor. Thank you.
13
               THE COURT: Thank you.
14
               Okay. I'm going to -- let's turn this over --
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     I want to turn this over to defense counsel now to see what,
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     if anything, anybody would like to add.
17
               I've got a list here of counsel, and I'm just
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     going to go down the list here alphabetically by counsel, as
19
     opposed to by defendant, just because that's the order in
20
     which I have -- this is the order in which I have people in
21
     front of me.
22
               So on behalf of Mr. Bennie Parker, Mr. Brennwald,
23
     did you want to add anything? And as part of this, you
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     know, I guess I'll ask each defense counsel to state their
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    position with respect to the government's motion.
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position may have been modified, may have changed in light
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     of subsequent detention decisions, it may not have. But if
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     you would just include that in the mix here in terms of
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     whatever you'd like to address, it would be helpful for me
 5
     to know who still objects to the 60-day request that the
 6
     government has made.
 7
               So why don't we start with Mr. Brennwald.
 8
               MR. BRENNWALD: Yes, Your Honor.
 9
               On behalf of Mr. Bennie Parker, we don't object to
10
     a 60-day extension.
11
               As far as the discovery, we're on board, we're
12
     doing everything we can, we have no issues to raise.
13
               THE COURT:
                           I'm sorry, Mr. Brennwald, you're going
14
     to have to speak up. I couldn't hear that last part.
15
               MR. BRENNWALD: I said, as far as discovery and
16
     other things, we have no issues to raise.
17
               THE COURT:
                           Okay.
18
               All right. Mr. Cooper, on behalf of Ms. Steele.
19
               MR. COOPER: Good afternoon, Your Honor.
20
               As with Mr. Brennwald, we don't have any objection
21
     at this point to the 60-day time frame the government was
22
     just contemplating given Ms. Steele's detention status at
23
     this point in time.
24
               With respect to discovery, that's an ongoing
25
     process. We're working with the government to see how
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quickly we can get all the materials we can get. So we
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 2
     don't have any issues at this point in time.
 3
               THE COURT: Okay.
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               Mr. Fischer, on behalf of Mr. Caldwell.
 5
               MR. FISCHER: Your Honor, on behalf of
 6
    Mr. Caldwell, we have no objections to the government's
 7
     60-day proposal.
 8
               Also, we have no issues regarding discovery.
 9
               THE COURT:
                          Okay.
10
               Mr. Foley, on behalf of Mr. Young.
11
               MR. FOLEY: Good afternoon, Your Honor.
12
               We do not have any objection to the 60-day
13
     exclusion, nor issues with respect to discovery.
14
               THE COURT: All right.
15
               Ms. Ginsberg, on behalf of Mr. Harrelson, this is
16
     your first appearance, along with Mr. Harrelson, for court,
17
     so happy to hear from you about the government's motion or
18
     anything else you'd like to address with respect to your
19
     client.
20
               MS. GINSBERG: Thank you, Your Honor.
21
               Yes, Mr. Zimmerman and I intend to file a motion
22
     regarding Mr. Harrelson's detention. I expect that that
23
     will be filed by the end of today. We're hoping that
24
     Your Honor will be able to have a hearing possibly -- I know
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     there's a hearing for another defendant scheduled this
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Friday afternoon. I don't know if the Court has additional time. But we are going to ask that the Court set a hearing as soon as the government has a chance to respond and the Court has time on its docket. I'm not certain what our position regarding the Speedy Trial motion is without knowing the outcome of the detention hearing, although I'm inclined not to oppose it at this point. But I have not had a chance to discuss that with Mr. Harrelson without the benefit of the Court's -obviously, without the benefit of the Court's ruling on detention. THE COURT: Okay. Well, we can -- we'll note your current position, Ms. Ginsberg. Can I ask: Have you started receiving -- and I'm only asking this specifically just because of your client's recent appearance, but in terms of discovery with respect to your client, have you all -- has the process begun of discovery? MS. GINSBERG: Yes, Your Honor, we have received the informal discovery that I believe has been provided to the other defendants. So we have received, I believe, what the government has shared with the other defendants. THE COURT: Very good.

All right. Anything else you'd like to add,

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Ms. Ginsberg? We can talk about -- we'll talk about a
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 2
     schedule -- let's go ahead and just do that now while we're
 3
     on the topic.
 4
               So if you think you're going to file tomorrow --
 5
     or did you say tomorrow, you said?
 6
               MS. GINSBERG: Probably by this evening.
 7
               MR. ZIMMERMAN: We will be filing it today, Judge.
 8
               THE COURT: Okay.
 9
               Ms. Rakoczy, how quickly do you think you could
10
     file an opposition?
11
               MS. RAKOCZY: Normally we would ask for about a
12
     week, at least through the weekend might be helpful, if we
1.3
     could have until Monday.
14
               THE COURT: Okay.
15
               And Mr. Harrelson is in Alabama; is that right?
16
               MS. GINSBERG: He's in Florida, Your Honor.
17
               THE COURT: He's in Florida, okay.
18
               I want to make sure that -- and we'll work to do
19
     this, but I want to make sure that the marshals don't come
20
     to get him until this is resolved, because if they do come
21
     to get him, he could then sort of fall into an
2.2.
     unfortunate --
23
               MS. GINSBERG: Black hole.
24
               THE COURT: -- black hole -- those were going to
25
     be my words, and it could take a while to get him here.
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So I'll make sure that the marshals are aware that
 1
 2
     Mr. Harrelson has filed this motion and that he's not to be
 3
     transported until the motion's resolved.
 4
               All right. Ms. Rakoczy, I'll give you till the
 5
     12th to file a response. And then I'm going to be away from
 6
     Washington next week, but that doesn't mean I can't hold
 7
     this hearing because we'll all be virtual. So it's a little
 8
     bit longer than I'm sure Ms. Ginsberg is requesting, but how
 9
     about next Wednesday morning, the 14th?
10
               MS. GINSBERG: Your Honor, that's fine.
11
               THE COURT: Mr. Zimmerman.
12
               MR. ZIMMERMAN:
                               Yes, Your Honor, I'm available as
13
     well.
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               I note that -- and I don't want to rush the
15
     government, but I note that the Court has ordered for Joshua
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     James, that the motion be filed by today, with the
17
     opposition due on Thursday, the 8th, and then the hearing on
18
     Friday.
19
               THE COURT: Yeah. And the reason -- and you're
20
     right. The reason I sped that up was because I am going to
21
    be out of town next week and I wanted to try and resolve
22
     that matter before I left town. So that was the reason for
23
     the compressed schedule.
                               Thank you, Your Honor.
24
               MR. ZIMMERMAN:
25
               THE COURT: So we'll work toward the 14th at
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10:00 a.m. That's a little bit tentative, because we'll 1 2 have to make sure we can -- we have a connection with the 3 facility in Florida where Mr. Harrelson is located. But all 4 counsel should proceed on the assumption that we'll do it at 5 10:00 on April the 14th at 10:00 a.m., okay? If for some 6 reason there's a logistical issue with that, we'll all let 7 you know if 10:00 a.m. is a problem. 8 Mr. Douyon, let me just check: Do you have any 9 reason to know right now whether we can't connect with that 10 facility at 10:00 a.m. next Wednesday? 11 DEPUTY CLERK: I do not unfortunately, Your Honor. I'll have to check with my contact. 12 13 THE COURT: All right. 14 So we'll just have to look into that, and unless 15 there's a problem, it will be 10:00 a.m. next Wednesday, the 16 14th. If there is a problem, we'll let you all know and 17 we'll get that rescheduled. 18 MS. GINSBERG: I am hopeful that we'll be able to 19 do it for a number of reasons but one in particular: 20 Mr. Harrelson is having medical issues that we don't believe 21 are being properly attended to by the jail, and so we do 22 want this detention motion to get in front of Your Honor as 23 quickly as possible. 24 THE COURT: Ms. Ginsberg, has the facility been 25 alerted to the medical issues by the magistrate judge?

MS. GINSBERG: Not by the mag- -- well, I believe 1 2 it was raised by the magistrate -- it was raised by his 3 counsel at the original detention hearing before the 4 magistrate judge. The marshals were present. I have had 5 several conversations with the medical unit at the jail, so 6 I know that they are aware of it. 7 There has been a little bit of improvement, but Mr. Harrelson's blood pressure is dangerously high, he's not 8 9 getting the medication that he's been prescribed for an 10 extended period by his private physician, although that 11 information has been made available to the jail. 12 I'm not certain what the difficulties are. 13 was, apparently, some improvement after I spoke on two 14 different occasions with the charge nurse. So I am keeping 15 in touch with the jail; I'm hoping that they'll be 16 responsive. THE COURT: Okay. 17 18 MS. GINSBERG: That is the situation at present. 19 THE COURT: Okay. 20 Well, if you think it would be helpful to have 21 some judicial order, I'm happy to try and do what I can do 22 to prompt some action here. 23 MS. GINSBERG: That would be helpful. And perhaps 24 Mr. Zimmerman and I will submit a proposed order and 25 Your Honor can look at it, and if Your Honor is comfortable

with it, I think that might be of assistance. 1 2 THE COURT: Okay. I'd be happy to do that. MS. GINSBERG: Thank you. 3 4 THE COURT: Okay. 5 All right. So that is Mr. Harrelson. 6 Let's turn to Mr. Crowl and Ms. Hernandez. 7 MS. HERNANDEZ: Your Honor, I have no objection to the 60-day exclusion, as my client is now released pretrial. 8 9 With respect to discovery, it's not an issue, or 10 maybe it is an issue, but it is going to come up: 11 release orders don't allow the defendants to have access to 12 computers. Much of the discovery -- or some of the 13 discovery involves videos. I'm not sure -- I've been trying 14 to figure out if there's some other device that can be 15 purchased that doesn't -- that's not a computer or laptop or 16 a computer. So that may become an issue. Either we'll have 17 to -- you'll have to authorize my travel to Ohio or the 18 defendant's travel here, or some how, some way in which he 19 can view some items that can only be viewed on the computer. 20 THE COURT: So that's a fair point, Ms. Hernandez. 21 And I think what I will ask you and anybody else, and 22 I think -- I guess there's a number of you who find yourself 23 in that situation for your clients, maybe the first thing to 24 do is just to work with the government to see if you all can 25 craft some language that would be acceptable to everybody

that would facilitate the review of discovery.

And to be clear, it was never my intention to create a restriction that would make it unduly burdensome for defendants and their counsel to consult and review discovery. And I do obviously recognize that most of the discovery here, if not all of it, is electronic.

And so that's what I'll ask counsel and

Ms. Rakoczy and government counsel to do. And if you all

want to tweak what the terms are of the conditions of

release for these -- for defendants like Mr. Crowl, then I'm

happy to do that.

MS. HERNANDEZ: And I've had some discussions with Ms. Rakoczy. I just wanted to alert the Court that might be coming up.

And while we're on that, Your Honor, perhaps — and we can submit an order to the Court — for purposes of court hearings, none of the released defendants — or most of them are not — are joining by phone again because of the computer restriction. If we could get — and the government would agree to a modification that would allow for virtual court hearings for the defendants to access. So we'll submit an order in that regard.

THE COURT: Okay. Very good.

All right. So let me then move to Mr. James.

MS. ROBIN: Yes, Your Honor.

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On behalf of Mr. James, we are in somewhat of a
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 2
     similar position to Mr. Harrelson. I will say that we just
 3
     received the initial round of discovery late yesterday
 4
     afternoon, so we are still making our way through that.
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     I think it's difficult for us at this point in time to make
 6
     an educated decision about the time frame proposed by the
 7
     government with respect to either decision or the extension
 8
     for speedy trial.
               Mr. James's detention hearing is on Friday and
 9
10
     that will necessarily impact his decision with respect to
11
     speedy trial.
12
               THE COURT: Okay.
13
               All right. And in terms of -- where is your
14
     client currently located?
15
               MS. ROBIN: He's currently in Alabama in the
16
     Talladega County Jail.
17
               THE COURT: I knew somebody was in Alabama;
18
     I wasn't sure -- I couldn't recall who it was.
19
               So we'll make sure. I mean, I think we may have
20
     already done this --
21
               MS. ROBIN: I think so.
22
               THE COURT:
                          I'm sorry?
23
               MS. ROBIN: I'm sorry to interrupt.
24
               I believe so. I've been in contact with the
25
    marshals down there and the court clerk, and I believe that
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we've relayed that information. So I feel confident that
 1
 2
     he'll at least remain there until Friday's detention
 3
     hearing.
 4
               THE COURT: Okay. Very good.
 5
               As I said, I think that issue has been floated up
 6
     to me, and we wanted to make sure that Mr. James remained --
 7
     stayed put until at least Friday.
 8
               MS. ROBIN:
                           Thank you.
 9
               THE COURT:
                           Okay.
               Let's then turn to Mr. Machado on behalf of
10
11
     Ms. Parker.
12
               MR. MACHADO: Yes, Your Honor.
13
               On behalf of Sandra Parker, we have no objection
14
     to continuing the matter 60 days, and we have no issues with
15
     regard to discovery.
16
               THE COURT:
                          Okay.
17
               And, Ms. Peterson, on behalf of Ms. Watkins.
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               MS. PETERSON: Yes, Your Honor.
19
               We're in a somewhat difficult position because, as
20
     the Court is obviously aware, Ms. Watkins is in custody and
21
     has been for quite some time.
22
               I'm not going to oppose this 60-day continuance,
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     but I do want to note for the record that I don't think in a
24
     situation like this, where the government arrests and
25
     detains people, that it's appropriate to indefinitely
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My

continue these matters because of a larger ongoing 1 investigation. 2 3 The government has an obligation to turn over the 4 discovery in a timely fashion. I'm particularly concerned 5 about Brady material that we believe is out there on the 6 CCTV camera footage, things that we've referenced in our 7 detention memorandum that we have filed to date. 8 So I would simply urge, through the Court, the 9 government to quickly make those materials available to us 10 in whatever form they can be made available so that we can 11 begin to move this case. 12 I've asked to hold my most recent bond review 13 motion in abeyance because I think I need to have the 14 material that we believe is there before I can proceed. 15 I would simply make that request. 16 THE COURT: Okay. 17 Well, look, let me make two things clear: 18 One is -- and this, I think, reflects my comment 19 earlier to Ms. Rakoczy, which is that: The fact of an 20 ongoing investigation doesn't, in my mind, create an 21 indefinite timeline here for the government to meet its 22 discovery obligations and for me to set a schedule in this 23 case, so that's one.

Two is -- and I think all government counsel are

aware of this -- that the Brady obligation is ongoing.

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25

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practice is to set a deadline for such -- the disclosure of
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 2
     such material obviously before trial, but that's certainly
 3
     not meant to allow the government to hold back on that
 4
    material. I think the government knows that it has an
 5
     obligation, once it becomes aware of Brady material, that
 6
     it's in possession of such material, that it should be
 7
     disclosed in a timely fashion, and that it's not to be held
     on to until the deadline itself arrives.
 8
 9
               All right. Let me then turn to Ms. Wicks on
10
     behalf of Mr. Minuta.
11
               MS. WICKS: Thank you, Your Honor.
12
               We don't oppose the 60-day extension.
13
               There was some informal discovery provided to FPD
14
     in New York that I'm in receipt of. And I did get an
15
     electronic link the other day, but I'm having problems with
16
     that and I communicated that to the AUSA that sent it to me.
17
     But I'll continue to follow up on that.
18
               THE COURT: Okay.
19
               All right. And let me turn, then, to Mr. Wilson
20
     on behalf of Ms. Meggs and Mr. Meggs.
21
               MR. WILSON: Good afternoon, Judge.
22
               We're not aware of any issues with discovery at
23
     this point.
24
               With respect to the 60-day extension, we will
25
    maintain our prior opposition primarily due to Mr. Meggs's
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custody status. He has been in custody for an extended 1 2 amount of time. There is a pending motion for 3 reconsideration of the Court's prior decision. The outcome 4 of that motion may very well dictate whether we continue to 5 object to the extension of time. But at this juncture, we 6 are required to, I think, maintain our objection. 7 THE COURT: Okay. Two things with respect to Mr. Meggs: One is, 8 let's set the schedule for an opposition from the 9 10 government. If I remember correctly, your papers were 11 filed -- you filed them yesterday or on Friday, I can't 12 recall. 13 MR. WILSON: There's been so many papers, Judge, 14 I can't say that I recall. It may have been as late as 15 yesterday. 16 THE COURT: Okay. 17 Ms. Rakoczy, can you give me a date by which an 18 opposition can be filed? 19 MS. RAKOCZY: We'd ask, again, for Monday, if that 20 would be possible, Your Honor. 21 THE COURT: All right. So we'll set down the 12th 22 for an opposition. 23 I'm quite familiar with Mr. Meggs's circumstances, 24 so let me look at the papers and then I'll decide whether we 25 need a hearing or not or whether it's just something I can

decide on the papers. So I'll take a look at what the 1 2 government submits and I've read the defendant's motion 3 already. All right. So that's one. 4 Two is, Mr. Wilson, I have not forgotten the issue 5 of joint representation and getting conflicts counsel, so 6 that is on my list of things to get done, and I'll try and 7 get that done in the next couple of days, to identify 8 conflicts counsel and get one appointed to consult with both your clients. 10 All right. Anything else, then, on behalf of 11 either of the Meggs defendants? 12 MR. WILSON: Well, Judge, with respect to the 13 conflict issue, I was contacted by the government, they 14 asked me to provide to them a copy of the conflict waiver 15 that I had Mr. and Ms. Meggs sign at the outset, and they 16 indicated that that may -- that the way that it was worded 17 may affect our decision with respect to whether they believe 18 there would be a conflict. I have not yet heard back, so 19 perhaps the government may be in a position to address that 20 now. 21 THE COURT: Does the government have -- and we 22 talked about this before and there was some thought that the government might move to compel separate representation. 23 24 I don't know whether the government has a better sense of

25

where things stand on that issue.

MR. NESTLER: Yes, Your Honor. This is Jeff
Nestler on behalf of the United States.

That's correct that Mr. Welton and I have had a dialogue about this and he very helpfully provided the written waiver that both of his clients signed.

The government does believe, and we're still looking into the issue, Your Honor, that it would be appropriate for Your Honor to appoint conflicts counsel and then have a colloquy with both defendants, as contemplated by Federal Rule of Criminal Procedure 44(c)(2), which spells out in some detail that the Court needs to assure itself and inquire about each defendant, about the propriety of the representation and personally advise each defendant of the risks of engaging — in the comments to that rule, Your Honor, there are some suggested questions for the colloquy depending on the case.

But the government believes that the first move would be conflicts counsel, which, after the conflicts counsel are appointed, speak with each Mr. and Mrs. Meggs, and then come back for another hearing before Your Honor. Your Honor could have that colloquy and then the government would assess whether we think that colloquy is adequate to protect the record and all of the defendants' rights or whether we think there needs to be anything further done.

THE COURT: Okay.

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All right. Well, I'll do that.
 1
 2
               And, in fact, I'll turn to reaching out to
 3
     conflicts counsel, at least who I have in mind to be
 4
     conflicts counsel, and see if we can get somebody lined up
 5
     and get that process in motion sooner, rather than later.
 6
               So, Mr. Wilson, you may get -- hopefully, you'll
 7
    be getting a call in the next few days from somebody to
 8
     arrange to speak to your clients, okay?
 9
              MR. WILSON: Yes, sir.
10
               THE COURT: All right.
11
               So, Ms. Wilson, then, on behalf of Mr. Young.
12
              MS. WILSON: Good afternoon, how are you?
13
               THE COURT: I'm sorry?
14
              MS. WILSON: I said: "Good afternoon,
     Your Honor."
15
16
               So we already spoke, Bob Foley spoke.
17
               THE COURT: Yes, that's right. I was just going
18
     down my list. So I came to you at the very end.
19
              MS. WILSON: No problem. Thank you for checking
20
     in, Your Honor.
21
               THE COURT: All right.
22
               Have I asked all counsel -- have I addressed all
23
     counsel for each defendant in their case? I hope I have.
24
     Okay. Good.
25
               All right. So in terms of the 60-day clock,
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here's what we're going to do. I'm going to at least --
 1
 2
     let's just set down a date 60 days out from now, and then
 3
     I'll formally consider the motion before the end of the week
 4
     and get out my order on that.
 5
               So let's all open up our calendars. That puts us
 6
     around first week in June, second week in June. How about
 7
     June 7th at 11:00 a.m.? Is that a time that's available for
 8
     everyone? If not --
 9
               MR. BRENNWALD: Your Honor, Steve Brennwald on
10
    behalf of Mr. Parker.
11
               I was supposed to be in trial today with Judge
12
            That kind of took care of itself. But I'm supposed
13
     to start a trial on June 7th with Judge Friedrich. So I
14
     always seem to have these trials on the same date as these
15
    hearings.
16
               THE COURT: All right.
17
              Mr. Brennwald, when's that trial supposed to
18
     start?
19
              MR. BRENNWALD: June 7th, Monday.
20
               THE COURT: Okay.
21
              MR. BRENNWALD: Should last about a week.
22
               THE COURT: How about June 1? I'm just trying to
23
     see if we can accommodate everybody here.
24
               How about June 1 at 10:00 a.m.?
25
               MS. PETERSON: Your Honor, will this be by Zoom?
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THE COURT: Yes.
 1
 2
              MS. PETERSON: Then that's fine.
 3
              MS. GINSBERG: Your Honor, I'm not available that
 4
          I have a hearing in Harrisonburg, Virginia, that day.
 5
     I think Mr. Zimmerman can be available.
 6
               THE COURT:
                           Okay.
 7
               If Mr. Zimmerman is available, I would just as
     well keep to that date if that's the only conflict.
 8
 9
               MR. ZIMMERMAN: I am, Judge. Thank you.
10
               MR. FISCHER: Your Honor, unfortunately, I do have
11
     a trial that day in Howard County Circuit Court that's an
12
     all-day trial.
13
               THE COURT: Can you -- is there anybody that could
14
     stand in? Do you have a partner or a colleague that could
15
     stand in for you, Mr. Fischer?
16
              MR. FISCHER: I do, Your Honor.
17
               THE COURT: Okay.
18
               That would be helpful. I mean, it's going to be
19
     near impossible, I think, probably to schedule -- to have
20
     all 12 defense counsel and government counsel available.
21
               So if you could have somebody there that day, that
22
     would be helpful. And trials have a way of going away, too,
     as you know.
23
24
               MR. FISCHER: Will do, Your Honor.
25
                           So June 1, 10:00 a.m., will be our
               THE COURT:
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next court date. And as I said, I will get out an order with respect to speedy trial shortly.

The only other housekeeping matter I wanted to raise -- and this is for the benefit of those counsel and defendants who have just only recently appeared, and that is to just once again remind the government of its obligations to disclose material under *Brady* and our Local Rule that embodies the obligations under *Brady* and its progeny.

And as I said earlier, under our Local Rule, the government's obligation is to turn that material over as soon as it becomes available or aware of it, I should say, and that there are consequences, both in terms of the case and professionally potentially for defense counsel — excuse me, for government counsel that doesn't — that do not carry out that obligation.

And so, Ms. Rakoczy, I'll just ask you, for the record, to acknowledge your understanding of the obligation on behalf of all government counsel.

MS. RAKOCZY: Yes, Your Honor. Thank you. We understand.

THE COURT: All right.

With that, everyone, that is my list of to-dos for this afternoon.

Before we adjourn, does anybody else want to raise anything else or I'll turn to my Courtroom Deputy and see if

I've forgotten anything to raise this afternoon. 1 2 PRETRIAL SERVICES OFFICER: Your Honor, this is 3 Ms. Holman with Pretrial Services. 4 I'd like to be heard on the Donovan Crowl matter 5 with respect to his release conditions. 6 THE COURT: Okay. 7 PRETRIAL SERVICES OFFICER: I'm not sure if the 8 Court had a chance to read the report I submitted on 9 yesterday. 10 Conditions of release were modified on the 2nd, 11 which allows for him to have, in his possession, a flip 12 phone to communicate with counsel, it says, Healthcare, 13 friends and family not affiliated with Oath Keepers, and to 14 submit his monthly bill for review; however, the Southern 15 District of Ohio is indicating that that is going to be 16 difficult for them to do, to go through a list of numbers 17 and try to figure out who's family, who's friends, or who's 18 part of the Oath Keepers. So what they're asking for is a 19 list of approved names and numbers of friends and 20 families -- I'm sorry, friend or family that's outside of 21 the healthcare and defense counsel. 22 THE COURT: All right. 23 Ms. Holman, I did see that and thank you for the 24 reminder. You know, my view is as follows: I'm not --25 while I've placed this restriction on Mr. Crowl as well as

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others, you know, I'm not asking to deputize Pretrial
 1
 2
     Services in any jurisdiction to start acting as law
 3
     enforcement agents and flyspecking every phone record,
 4
     et cetera.
 5
               I think the defendants know what the restrictions
 6
     are. They need to understand and they do understand that if
 7
     they violate those restrictions and it's discovered, that
 8
     there are potential consequences.
 9
               And so if you would just communicate to your
10
     colleagues that I'm not going to order -- I'm not going to
11
     order what they're requesting, not because I don't
12
     appreciate the diligence, but because I'm not asking to do
13
     what they're contemplating doing, okay?
14
               PRETRIAL SERVICES OFFICER: Okay, Your Honor.
15
     Thank you.
16
               MS. HERNANDEZ: Your Honor, I will submit a
17
    modified order, if the Court wants, that eliminates that
18
    particular provision.
               THE COURT: Oh, in terms of turning the phone
19
20
    bills over?
21
               MS. HERNANDEZ: Yeah.
22
               THE COURT: That's fine.
23
               I mean, unless -- I don't think the government was
24
     insisting on it; you agreed to it, so I sort of signed off
25
     on it.
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So I mean, if the government doesn't object, then I'm happy to sign off on a condition that doesn't require him to disclose phone records. MS. RAKOCZY: We understand the Court's position, Your Honor. We had asked for that because we do think it's important that the defendants know that there is review. I understand Pretrial is in a tough position to monitor it, but a very long list of numbers might raise an alarm bell such that Pretrial could raise it with Your Honor, even if they're not necessarily looking into every single phone number. THE COURT: Well, as I said, it's -- I really --I think this puts Pretrial in a really difficult position. And, you know, frankly, just the number of calls people receive from unknown numbers start appearing on phone records could raise questions, and I just don't want to put Pretrial in that position. So I'm not inclined to require the continued disclosure of phone records unless there's some reason to. I'm also balancing -- just because somebody is a defendant doesn't mean their privacy interests go out the door either. So I think the restriction is in place, it's meant to ensure no further contact with the other potential people who were involved in the conduct here, and I think that's

sufficient for our present purposes. 1 2 Okay. Anyone else? 3 MR. MACHADO: Your Honor, this might be a little 4 overkill, but given that we're 60 days out and there's a 5 standing order with regard to the COVID situation, can we 6 just assume that, regardless of any change, that all the 7 parties and the attorneys can appear via Zoom? 8 THE COURT: Well, I think so. 9 I mean, you know, until we are all at a place 10 where everybody's -- where I think the conditions are such 11 that we can all come back to the courtroom comfortably, 12 that's fine. 13 I mean, look, the other thing is, this case is 14 unique in that most of the defendants, if not all of them, 15 frankly, reside outside the District of Columbia, at least 16 the ones who were on release. And so I'm not going to haul 17 people in from across the country just for an a hourlong 18 status hearing when everybody can appear via Zoom. So I 19 won't do that to the defendants and I won't do that to 20 counsel unless it's necessary, okay? 21 MR. MACHADO: Thank you. 22 THE COURT: Yeah. I mean, frankly, this is 23 logistically much easier than having 12 defendants and 24 counsel in a courtroom, along with six or seven prosecutors.

So in many respects doing this via Zoom is much easier than

25

having it done in a courtroom. 1 2 Okay. Anything else, anyone? 3 MS. RAKOCZY: Your Honor, for the government, 4 could we just raise a point of clarification with respect to 5 the protective order that the Court entered? 6 The Court did sign a protective order that was 7 captioned for all 12 current defendants, but in the Docket 8 Entry, it had noted that the order was being entered for the first ten defendants. That may have just been a function of 10 the fact that the indictment, while returned, had not been 11 docketed at that time, but we did just want to clarify that 12 the protective order governs discovery for all 12 of the 13 defendants. 14 THE COURT: Thanks for raising that, Ms. Rakoczy. 15 My view about this is that just because a 16 protective order has been entered as to one defendant, that 17 doesn't foreclose later defendants from coming in and 18 raising their own objections. So for the defendants that 19 have not formally consented to the protective order -- and 20 I think that would include Mr. Harrelson and Mr. Minuta --21 MS. RAKOCZY: And Mr. James, Your Honor. 22 THE COURT: And Mr. -- who was the last one? MS. RAKOCZY: Mr. James. 23 24 THE COURT: So what I'll just do is I'll ask those 25 three counsel and the government to just notify me by

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Thursday -- I'm sorry -- yeah, by Thursday, if there are any
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 2
     objections that any of those defendants have to the
 3
     protective order.
 4
               So the way we'll operate right now is that,
 5
    presumptively, the protective order will apply to those
 6
     three defendants and their counsel. I'll give everyone an
 7
     opportunity to lodge any objections that you think you may
 8
     have, and if you have any, just let me know by Thursday. If
     there are none, then just let me know that, too. A simple
 9
10
     joint filing to that effect would be helpful, okay?
11
               MS. RAKOCZY: Thank you, Your Honor.
12
               THE COURT: All right. I quess I'll make one last
13
     call here: Does anybody want to raise anything else this
14
     afternoon?
15
               Okay. Thank you all very much, take care,
16
     everyone, and we'll be in touch with everybody soon.
17
               (Proceedings concluded at 4:58 p.m.)
18
19
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21
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C E R T I F I C A T E

I, William P. Zaremba, RMR, CRR, certify that the foregoing is a correct transcript from the record of proceedings in the above-titled matter.

Please note: This hearing occurred during the COVID-19 pandemic and is therefore subject to the technological limitations of court reporting remotely.

Date:__June 13, 2021_____ /S/__William P. Zaremba_____
William P. Zaremba, RMR, CRR

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MR. BRENNWALD: [5]	1431 [1] 3/21	4333 [1] 4/9	15/19 16/12 16/13	5/4 5/8
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MR. COOPER: [1]	1512 [4] 9/17 10/15	472-3391 [1] 2/9	24/1 24/1 24/11 25/9	All right [1] 26/13
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