



U.S. Department of Justice

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Via Email

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Re: *United States v. Ethan Nordean et al.*, Cr. No.: 21-cr-175 (TJK)

Dear Counsel:

I write in response to questions that we have received from Ms. Carmen Hernandez regarding the location of Telegram messages referenced in the Second Superseding Indictment and the Donohoe Statement of Offense among other filings in this case. Specifically, on April 10, 2022, Ms. Hernandez explained that she was attempting to locate the following message groups:

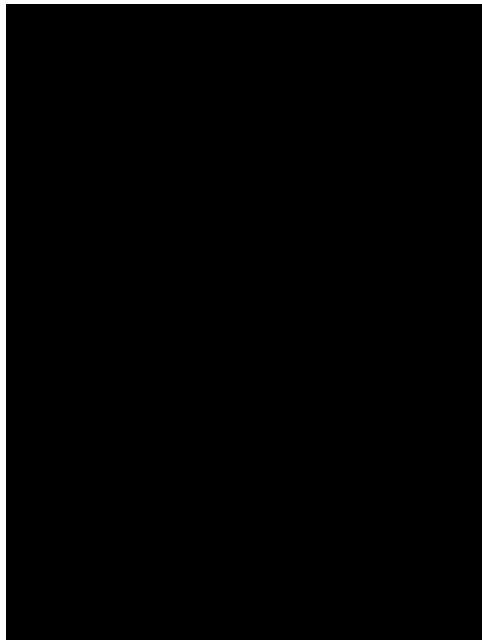
- MOSD Leaders Group (formed on 12/20/20)
- MOSD Prospect Group (formed on 12/27/20)
- MOSD Members Group (formed on 1/2/21)
- New MOSD Leaders Group (formed on 1/4/21)
- New MOSD Members Group (formed on 1/4/21)
- Boots on the Ground Group

The index on the following page sets forth the Telegram Identifier for the group chat, the creation date, and the title of the group as assigned by the creator(s) of the message group. For your reference, we have also added our brief description of the group as you will typically find the message group defined or referenced in government filings, e.g., the Second Superseding

Indictment. The list of Telegram message groups set forth below is not an exhaustive list of relevant messages. It instead represents a collection of group messages that are pertinent to the Second Superseding Indictment.

Telegram Identifier	Creation Date¹	Title	Description
	5/27/2019	“Official Presidents Chat”	Presidents Chat
	9/27/2020	“Skull and Bones 2020/2021”	Skull and Bones
	12/20/2020	“Ministry of Self Defense”	MOSD Leaders Group
	12/27/2020	“Ministry of Self Defense”	MOSD Prospect Group
	12/31/2020	“Ministry of Self Defense – Op”	MOSD - Op
	1/1/2021	“Ministry of Self Defense – Op”	MOSD – Op 2
	1/2/2021	“Ministry of Self Defense”	MOSD Members Group
	1/4/2021	N/A	Elders
	1/4/2021	“New MOSD”	New MOSD Leaders Group
	1/4/2021	N/A	New MOSD Members Group
	1/5/2021	“Boots on Ground”	Boots on Ground

These Telegram message groups can be reviewed in Cellebrite for each of the scoped Cellebrite cellphone extractions that have been produced in this case. To locate the message string in Cellebrite, you must first navigate to the Telegram messages in Cellebrite. The screenshot below shows the Telegram messages as a component of Nordean’s “Chats.”

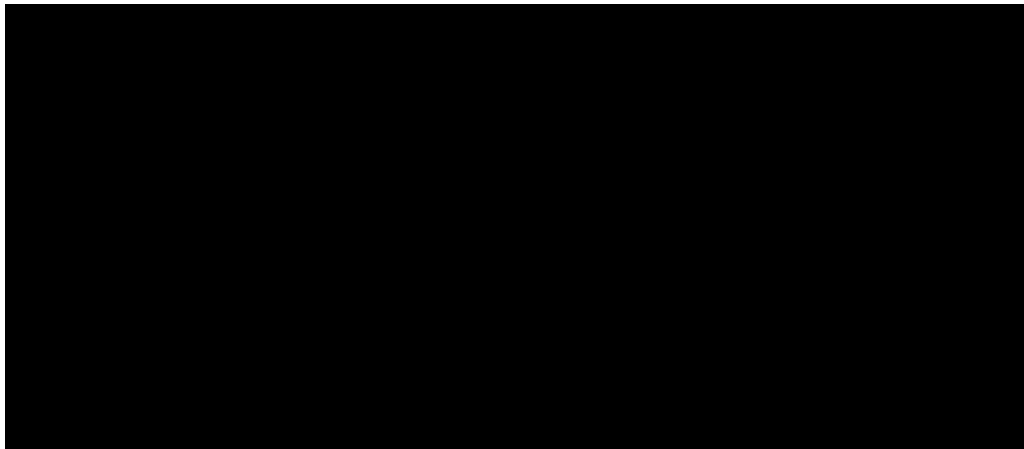


¹ Based on Eastern Time.

Once the Telegram chats have been identified and opened in Cellebrite, they can be filtered using the number for the Telegram Identifier in the column identified as “ID.” The screenshot below shows Nordean’s Telegram messages filtered by “[REDACTED],” which is the Telegram Identifier for the MOSD Leaders Group.

				Participants	Start Time	Last Activity	ID	Source
550	29	11		573782641 Rufio Panman (owner) 581632416 Enrique Florida Pb 654712116 Joe Bigs 586406520 YutYut Cowabunga 454128414 Captain Trump	12/19/2020 9:24:38 PM(UTC-8)	1/25/2021 2:41:29 PM(UTC-8)	[REDACTED]	Telegram

Please note that the extractions from one phone may more or less information than was recovered from the *same message group in a different phone*. For example, the following messages appear in the Telegram message string “[REDACTED]” (MOSD Members Group) in the extract from Mr. Tarrío’s device. However, the two messages below and others referenced in the Second Superseding Indictment were not recovered from the extract of Mr. Nordean’s device. For this reason, even if you have reviewed a message string that was recovered from your client’s device, you will need to review the same message string as it was extracted from other devices to ensure that you have reviewed all of the messages that may have been recovered.



Finally, due to the use of attached files (e.g., voice notes, photos, and other multimedia) in communications exchanged among the members of a message group, the communications in Telegram should be reviewed electronically in Cellebrite. While we have endeavored to provide text extracts of certain Telegram message strings in discovery, the text extracts do not include the content of attached files, e.g., voice notes.² As a result, some of the communications will not be accessible in an extracted text file.

Please let us know if you have been unable to access and download the materials for your use in this case. To assist our future productions of discovery, we would again request that you

² Similar to the messages discussed above, some attached files were recovered from certain phones, but not others. Please note that there may be instances in which an attached file (e.g., voice note) was not recovered in any device.

return external hard drives that we have supplied, once you have had an opportunity to copy the materials.

We understand that our discovery obligations are ongoing and intend to supplement our disclosures on a rolling basis. If you have any questions, please do not hesitate to contact us.

Sincerely yours,

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