

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 21-cr-609
	:	
v.	:	
	:	VIOLATIONS:
JEREMY BROWN,	:	
	:	18 U.S.C. § 1752(a)(1)
Defendant.	:	(Entering and Remaining in a Restricted
	:	Building or Grounds)
	:	18 U.S.C. § 1752(a)(2)
	:	(Disorderly and Disruptive Conduct in a
	:	Restricted Building or Grounds)
	:	
	:	

**Notice Regarding Why Case Has Been Designated As Related
To *United States v. Caldwell, et al., 21-cr-28***

The United States respectfully files this notice, in response to the Court’s Minute Order dated October 4, 2021, as to why the present case has been designated as related to *United States v. Caldwell*, 21-cr-28. Per Local Rule 57.12 (a)(1), criminal cases are deemed related when (i) a superseding indictment has been filed, or (ii) more than one indictment is filed or pending against the same defendant or defendants, or (iii) prosecution against different defendants arises from a common wiretap, search warrant, or activities which are a part of the same alleged criminal event or transaction. The present case, as it is currently charged, includes evidence from at least one overlapping cooperating defendant who has been charged in 21-cr-28. Further, the present case also involves specific electronic evidence, including encrypted messaging applications, showing the planning, transportation and movement of common individuals and weapons in preparation for January 6, that overlaps with the *Caldwell* case. Accordingly, the United States submits that these two matters arise from common activities which are a part of the same alleged criminal event.

Therefore, the United States respectfully seeks to relate the present case to *United States v. Caldwell*, 21-cr-28.

Respectfully submitted,

CHANNING D. PHILLIPS
ACTING U.S. ATTORNEY

By: /s/ Louis Manzo
LOUIS MANZO
Special Assistant United States Attorney
Massachusetts Bar No. 688337
United States Attorney's Office
District of Columbia
Telephone No. (202) 262-6570
Louis.Manzo@usdoj.gov