

No. 25-01456

In the

United States Court of Appeals

for the

Sixth Circuit

United States of America,

Plaintiff-Appellee,

v.

Meredith Grey,

Defendant-Appellant.

**ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

RECORD ON APPEAL

Marina S. Dolgova and Sophia Cronin, Directors
Harlan Fiske Stone Moot Court
Columbia Law School
2025-2026

Table of Contents

STIPULATIONS & LIMITATIONS.....	2
CRIMINAL COMPLAINT.....	4
AFFIDAVIT IN SUPPORT OF APPLICATION FOR COMPLAINT AND ARREST WARRANT.....	4
INDICTMENT.....	10
DEFENDANT MEREDITH GREY’S NOTICE OF MOTION TO DISMISS COUNT ONE OF THE INDICTMENT.....	11
[MOTION TO DISMISS COUNT ONE - BRIEFING IS OMITTED FROM THE RECORD]	14
OPINION AND ORDER [MTD].....	15
TRIAL TRANSCRIPT DAY 2.....	18
TRIAL TRANSCRIPT DAY 3.....	52
VERDICT OF THE JURY.....	58
[MOTION FOR A JUDGMENT OF ACQUITTAL NOTWITHSTANDING THE VERDICT BRIEFING IS OMITTED FROM THE RECORD].....	59
OPINION AND ORDER [JUDGMENT OF ACQUITTAL].....	60
PRE-SENTENCE REPORT.....	61
LETTER FROM STEVEN GREY.....	67
TRIAL TRANSCRIPT SENTENCING.....	69
JUDGMENT.....	80
NOTICE OF APPEAL.....	88

STIPULATIONS & LIMITATIONS

1. This record is a work of fiction. Any and all references, similarities, or allusions to any real-life cases are accidental and should have no effect on the legal analysis of this record.
2. All of the facts needed to analyze the moot court problem are contained within this record. Competitors should not reference facts from real world cases or controversies that are not provided in this record.
3. As in a real case, students may not cite to scientific evidence not presented at trial, but may cite to the exhibits in the record, the trial transcript, and to any legal authority. Students should be mindful that some of the items typically found in an appellate record reflect allegations, not evidence, and cannot be relied upon as sources of facts. *See, e.g. Taylor v. Kentucky*, 436 U.S. 478, 485 (1978) (indictment is not evidence); *United States v. Chavez*, 951 F.3d 349, 363 (6th Cir. 2020) (same); *United States v Roberts*, 986 F2d 1026, 1032 (6th Cir. 1993) (jury properly instructed that “[t]he lawyers’ statements and arguments are not evidence”).
4. It is undisputed that all motions have been timely filed.
5. The parties have not challenged the qualifications of any expert witnesses, nor have they raised objections to the scope of the experts’ expertise.

The Messages:

6. All of the trial exhibits have been properly admitted, including the iMessages that form the basis for the conviction.
7. For the purposes of this appeal, the parties do not dispute that Ms. Grey sent the messages in question, nor do they dispute the messages’ authenticity.
8. This moot court problem does not ask the parties to address, on appeal, whether the evidence was adequate to show that the defendant knowingly transmitted the iMessages with the purpose of issuing a threat.
9. For purposes of this appeal, the parties do not dispute that the messages at issue were iMessages sent over the Internet, not text messages sent over a cellular network.

Sentencing:

10. This moot court problem does not ask the parties to address the length of the defendant’s sentence. The parties agree that the length of the sentence is consistent with the U.S. Sentencing Guidelines. Accordingly, some portions of the record which would typically explain the sentencing calculation under the Guidelines have been omitted.
11. The defense has not preserved—and students should not address—a claim that the sentence is procedurally unreasonable.

12. The defense has not preserved—and students should not address—a potential challenge to the sentence on vagueness grounds.
13. The United States Sentencing Guidelines neither recommend nor prohibit the special condition of supervised release being challenged by the defendant in this case.
14. No one in this case has requested restitution.

Questions Presented:

15. The only issues on appeal are the two issues preserved in the motions and at the sentencing hearing. Namely:
 - (1) Whether use of the Internet alone is sufficient to establish that messages traveled across state lines to satisfy the interstate commerce requirement of 18 U.S.C. § 875(c); and
 - (2) Whether the District Court erred by sentencing Grey to a term of supervised release that included a prohibition against using the Internet “as a means of expressive communication,” with limited exemptions.

Both of these issues were timely and properly preserved for appeal in the United States District Court for the Eastern District of Michigan.

All references to statutes are frozen in time as of September 30, 2025.

16. For purposes of this appeal, parties should only reference cases and secondary sources decided or published before September 30, 2025.

CRIMINAL COMPLAINT

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
MEREDITH GREY

)
)
)
)
)
)
)

Case No.
CR 3-25-128

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 28, 2024 in the county of Alcona in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 875(c)	Interstate communication threat of injury and/or bodily harm

This criminal complaint is based on these facts:

Please see the attached affidavit of FBI SA Derek Shepherd

Continued on the attached sheet.

/s/ Derek Shepherd

Complainant's signature

Derek Shepherd, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/25/2024

/s/ Miranda Bailey

Judge's signature

City and state: Detroit, MI

Hon. Miranda Bailey, U.S. District Judge

Printed name and title

Print **Save As...** **Attach** **Reset**

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR COMPLAINT AND
ARREST WARRANT**

I, Derek Shepherd, a Special Agent of the Federal Bureau of Investigation ("FBI) being duly sworn, declare and state as follows:

INTRODUCTION

1. I make this affidavit in support of an application under Federal Rules of Criminal Procedure 3 and 4 for a criminal complaint and arrest warrant for MEREDITH GREY ("GREY"). For the reasons set forth below, I submit that there is probable cause to believe that GREY violated the following: Title 18 U.S.C. § 875(c) by using interstate communication by means of iPhone messages to issue a threat to injure Dr. Christina Yang.
2. I submit this affidavit for the limited purpose of securing a criminal complaint and arrest warrant. I have not included every fact known to me concerning this investigation. Instead, I have set forth only the facts to establish probable cause that violations of the federal law identified have occurred.
3. I have based my statements in this affidavit on my training and experience, personal knowledge of the facts and circumstances obtained through my participation in this investigation, information provided to me by other agents and law enforcement officers, information provided by reports of other law enforcement officers, information provided by photographic evidence, and information provided by records and databases. Where I refer to conversations and events, I often refer to them in substance and in relevant part rather than in their entirety or verbatim, unless otherwise noted. This affidavit also reflects my current understanding of facts relating to this investigation. That understanding may change as the investigation proceeds. In addition, my experience and training as an FBI Special Agent also forms the basis of the opinions and conclusions set forth below.

AFFIANT BACKGROUND

4. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been an FBI Special Agent since 2019. I am currently assigned to the Detroit Field Office, where

I specialize in investigations of domestic crimes involving the Internet. I primarily investigate United States persons who commit criminal acts in furtherance of their political or social ideology. I successfully completed the 21-week New Agent Training at the FBI Academy in Quantico, Virginia in 2019. During that time, I received training in legal statutes and procedures, physical and electronic surveillance techniques, and confidential source management. I have also completed an 11-day Internet Investigation Program in Glynco, Georgia, as well as an online Cyber Crime Investigations Course. Both programs focused on the history and workings of the Internet.

5. As an FBI agent, I am authorized to investigate violations of United States law and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States.
6. I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7). I am authorized by law to make arrests for violations of Federal law.

APPLICABLE STATUTE

7. Title 18, United States Code, Section 875(c) in relevant part states: “Whoever transmits in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another, shall be fined under this title or imprisoned not more than five years, or both.”

FACTS SUPPORTING PROBABLE CAUSE

8. On August 3, 2024, at 3:41 p.m., Dr. Christina Yang (“Dr. Yang”) filed a police report with the St. Joseph Charter Township Police Department (“St. Joseph PD”), citing threats against her and her medical practice located in Lincoln, Michigan.
9. Dr. Yang showed police officers her phone and provided screenshots of the messages sent to her via iMessages from the phone number 989-222-2222. Dr. Yang believed that this number was registered to GREY. Subsequent investigation confirmed that the number was registered to GREY.
10. The first iMessage was sent on July 13, 2024 (“the July 13 Message”) and stated: “What you are doing is wrong!!! You intentionally disabling our children and making them autistic. As a doctor, you should know better than vaccinating our kids and pushing

covid vaccines on everyone. I have told you before to stop, but nothing is changing. I wish someone would take the matter into their own hands and destroy you and your entire practice that kills people.”

11. On July 28, 2024, Ms. Grey sent a series of iMessages (“the July 28 Messages”) making the following three statements:

- a. “I am going to do what must be done to stop you from destroying our children’s lives.”
- b. “You and your practice are going to cease to exist any day now. I have tried to peacefully convince you to stop vaccinating and poisoning our community, but you did not listen. We were doing fine without you here. Once you gone, the natural order will resume.”
- c. “You were warned, it is too late now to change anything. You reap what you sow.”

12. After Dr. Yang filed the report, St. Joseph Police Department Officer Izzie Stevens contacted the FBI Field Office in Detroit, Michigan to report a potential domestic terrorism threat and also forwarded the filed report to the FBI Detroit Field Office.

13. On August 8, 2024, I was assigned to investigate the matter. I spent the following week familiarizing myself with the report and scheduling an interview with Dr. Yang.

14. I employed FBI digital forensic expert, George O’Malley, to trace the sender's phone number and retrieve any underlying data from the communication transmitted.

15. O’Malley uncovered that the sender’s phone number was registered to MS. GREY. He also concluded that the recipient and the sender used Apple devices and the messages were transmitted via Apple servers, which utilize the Internet.

16. On August 21, 2024, I interviewed Dr. Yang at her residence. Dr. Yang showed me the July 13 Message and the July 28 Messages that were sent to her from the number registered to GREY.

17. During the interview, Dr. Yang shared that while the July 13 Message was worrisome, she did not quite take it seriously as she had known GREY to be an active and vocal member of the Lincoln community, advocating against vaccination during the COVID-19 pandemic. She had also seen GREY share many anti-vaccination posts across various social media platforms, including Facebook, X, and Instagram. However, upon receiving

the July 28 Messages, Dr. Yang became fearful for herself, her practice, and her patients. Dr. Yang decided to cancel the rest of her appointments and proceeded to close the office and file a report with the St. Joseph PD.

18. After the interview, as a part of the investigation, I visited GREY's social media accounts across various platforms to confirm Dr. Yang's interview statements regarding GREY's anti-vaccination activism.
19. GREY's Facebook page was accessible to the public. The page contained fifteen anti-vaccination-related posts shared between May 3 and August 3, 2024. General content of the posts called upon doctors and the public to stop vaccinating children, stating that vaccines cause autism, other disabilities, and even death. Some of the posts criticized the government and the Department of Health for promoting COVID-19 vaccines.
20. GREY's public Instagram and X account contained similar posts and messages, blaming doctors for promoting vaccines that lead to gene mutations and disabilities in children.
21. On August 28, 2024, I visited GREY's residence to conduct an interview. Upon my arrival, I noticed multiple yard signs that read, *inter alia*, "STOP VACCINATION," "OUR CHILDREN DESERVE BETTER," "RESIST BIG PHARMA," and "CANCEL CHRISTINA YANG."
22. GREY agreed to answer my question regarding the July 13 Message and July 28 Messages. She admitted to sending the messages and confirmed that Dr. Yang's screen shots of the messages were accurate. She explained that she is taking necessary measures to protect the Lincoln community and, most importantly, its children. She mentioned that she previously attempted to speak with Dr. Yang but was turned away. She stated that she saw no other way to get her message across but to text Dr. Yang and demand that Dr. Yang stop forcing vaccination upon parents.
23. Throughout the interview, GREY was adamant that as a responsible member of her community, she must protect its most vulnerable population (children) at all costs.
24. When asked what "at all costs" means and whether GREY meant to threaten Dr. Yang, GREY ceased to answer questions and stated that she wanted to speak to an attorney.

CONCLUSION

25. Based on the information above, there is probable cause to believe that GREY

intentionally threatened Dr. Christina Yang in violation of 18 U.S.C. § 875(c). Therefore, I respectfully request that the Court issue a criminal complaint and arrest warrant against GREY.

/s/ Derek Shepherd

DEREK SHEPHERD

Special Agent

FEDERAL BUREAU OF INVESTIGATION

Sworn to before me over the telephone and signed by me pursuant to Fed. R. Crim.P. 4.1 and 4(d) on this 25th day of September 2024.

/s/ Mark Sloan

HONORABLE MARK SLOAN

United States Magistrate Judge

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

-v.-

MEREDITH GREY

Defendant.

---CR 3-25-128---

INDICTMENT

18 U.S.C. § 875(c)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Interstate Communication)

18 U.S.C. § 875(c)

MEREDITH GREY

who is named as defendant herein, beginning in or around July 13, 2024 through and including July 28, 2024, in the State and District of Michigan, did knowingly transmit communication in the form of iMessages to Dr. C. Y. in interstate commerce using the Internet that contained a threat, and said threat was to injure another person, in violation of 18 U.S.C. § 875(c).

Dated: November 3, 2024

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

-v.-

MEREDITH GREY,

Defendant.

----CR 3-25-128----

Hon. Miranda Bailey
United States District Judge

Oral Argument Requested

DEFENDANT MEREDITH GREY'S NOTICE OF MOTION
TO DISMISS COUNT ONE OF THE INDICTMENT

Defendant Meredith Grey, by and through counsel, hereby moves this court to dismiss Count One of the Indictment for failure to state an offense, pursuant to Federal Rules of Criminal Procedure 7(c)(1) and 12(b)(3)(B)(v). Ms. Grey relies upon and incorporates the law and facts set forth in the accompanying brief.

Dated: March 3, 2025

Respectfully Submitted,

/s/ Alex Karev

Alex Karev
Federal Community Defenders
Eastern District of Michigan
613 Abbott St.
Detroit, MI 48226
Phone: (313) 967-5542

CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2025, I electronically filed a copy of the foregoing. Notice of this filing will be sent via email to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

/s/ Alex Karev

Alex Karev

**[MOTION TO DISMISS COUNT ONE - BRIEFING IS OMITTED FROM THE
RECORD]**

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

UNITED STATES OF AMERICA

-v.-

MEREDITH GREY,

Defendant.

----CR 3-25-128----

Hon. Miranda Bailey
United States District Judge

OPINION AND ORDER

On November 3, 2024, a grand jury charged Defendant Meredith Grey with communicating an interstate threat in violation of 18 U.S.C. § 875(c) (Count One). (ECF No. 1). On March 3, 2025, Defendant filed a motion to dismiss the Indictment. (ECF No. 35). For the reasons set forth below, the Court denies the Defendant’s motion.

I. LEGAL STANDARD

Federal Rule of Criminal Procedure 7(c)(1) states that “[t]he indictment or information must be a plain, concise, and definite written statement of the essential facts constituting the offense charged.” In fact, the indictment “need not contain a formal introduction or conclusion.” FED. R. CRIM. P. 7(c)(1). An indictment is sufficient if it contains the elements of the offense charged, fairly informs a defendant of the charges against which he must defend, and enables him to plead an acquittal or conviction in bar of future prosecutions for the same offense. *Hamling v. United States*, 418 U.S. 87, 117 (1974). It is necessary for the indictment to be read

as a whole, accepting all the factual allegations as true and interpreting those allegations “in a practical sense with all the [] implications.” *United States v. McAuliffe*, 490 F.3d 526, 531 (6th Cir. 2007).

Moreover, “[a]n indictment will usually be sufficient if it states the offense using the words of the statute itself, as long as the statute fully and unambiguously states all the elements of the offense.” *United States v. Superior Growers Supply, Inc.*, 982 F.2d 173, 176 (6th Cir. 1992). The statutory language, however, “must be accompanied with such a statement of the facts and circumstances as will inform the accused of the specific offense, coming under the general description with which he is charged.” *Hamling*, 418 U.S. at 117-18.

Under Federal Rule of Criminal Procedure 12(b)(3), a district court may hear defenses that can be determined without a trial on the merits during the pretrial motions. “Generally, motions are capable of determination before trial if they raise questions of law rather than fact.” *United States v. Jones*, 542 F.2d 661, 664 (6th Cir. 1976). While pretrial motions may challenge the legal sufficiency of an indictment, a motion to dismiss must not be a “summary trial of the evidence.” *United States v. Marra*, 481 F.2d 1196, 1199-1200 (6th Cir. 1973). “[W]here the defendant is arguing that as a matter of law the undisputed facts do not constitute the offense charged in the indictment, the Court is reviewing a question of law, not fact.” *United States v. Vertz*, 40 F. App’x 69, 70 (6th Cir. 2002). “An indictment is sufficient (in the terms of stating an offense[]) if it alleges conduct satisfying every element of the charged offense.” FED. R. CRIM. P. 12(b)(3)(B)(v).

II. DISCUSSION

A person violates 18 U.S.C. § 875(c), if they “transmit[] in interstate or foreign commerce any communication containing . . . any threat to injure the person of another.” In order to convict a defendant under the statute, the government must prove three elements beyond reasonable doubt: “(1) the defendant transmitted a communication in interstate or foreign commerce; (2) the communication contained a threat; and (3) the threat was to injure or kidnap another person.” *United States v. Killingsworth*, No. 21-3028, 2022 WL 294083, at *2 (6th Cir. Feb. 1, 2022).

Count One of the Indictment tracks the elements of the statute as it alleges that Ms. Grey “did knowingly transmit communication in the form of iMessages to Dr. C. Y. in interstate

commerce using the Internet that contained a threat, and said threat was to injure another person, in violation of 18 U.S.C. § 875(c).” ECF No. 1.

Defendant, however, argues that the Indictment is legally deficient as it fails to sufficiently allege the violation of the interstate commerce element. ECF No. 35, p. 4. Particularly, Defendant argues that mere allegation that the Internet was used is insufficient to support the allegation that communication occurred “in interstate . . . commerce.” *Id.* [Additional analysis and citations omitted.]

The government contends that mere use of the Internet is sufficient to show that communication occurred “in interstate . . . commerce.” [Additional analysis and citations omitted.] Further, while the government recognizes that there is a circuit split of the issue, the government emphasizes that at this stage of the litigation, it has met its burden to sufficiently allege that Ms. Grey violated 18 U.S.C. § 875(c). ECF No. 36.

The Court, having reviewed the arguments, recognizes that the law in the Sixth Circuit is unsettled on the issue. However, at this stage of the litigation, without hearing the evidence, the Court finds it necessary to deny Defendant’s Motion to Dismiss Count One of the Indictment as the Indictment is sufficient because it contains the elements of the offense charged and fairly informs Defendant of the charges against which she must defend. For the stated reasons, the Court denies motion to dismiss.

Dated: April 3, 2025

/s/ Miranda Bailey

MIRANDA BAILEY

UNITED STATES DISTRICT JUDGE

TRIAL TRANSCRIPT DAY 2
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

----CR 3-25-128----

-v.-

MEREDITH GREY,

Defendant.

June 19, 2025

Transcript of Proceedings

TRIAL DAY 2

Before the Honorable Miranda Bailey

United States District Judge

APPEARANCES:

For the United States: Callie Torres

U.S. Attorney's Office

211 West Fort Street

Detroit, Michigan 48226

(313) 600-9215

For the Defendant: Alex Karev

Federal Community Defenders
Eastern District of Michigan
613 Abbott Street
Detroit, MI 48226
Phone: (313) 967-5542

Reported by: Preston Burke, RPR, CSR

Official Federal Court Reporter
Preston_Burke@mied.uscourts.gov

TABLE OF CONTENTS

<u>WITNESSES: UNITED STATES</u>	PAGE
Arizona Robbins	21-25
Dr. Christina Yang	25-37
FBI Special Agent Derek Shepherd	37-42
FBI Forensic Expert George O'Malley	42-48

WITNESSES: DEFENDANT

None

OTHER MATERIAL IN TRANSCRIPT:

Proceedings	21-57
-------------	-------

<u>EXHIBITS:</u>	<u>Identified</u>	<u>Received</u>
US Ex. 1		June 19, 2025
US Ex. 2		June 19, 2025
US Ex. 3		June 19, 2025

Detroit, Michigan

Thursday, June 19, 2025 - 9:36 a.m.

CLERK OF THE COURT: All rise. The United States District Court for the Eastern District of Michigan is now in session. This proceeding is United States of America v. Meredith Grey, number CR-3-25-128. The Honorable Miranda Bailey presiding.

THE COURT: Please be seated.

[INITIAL PROCEEDINGS OMITTED]

THE COURT: Is the government ready to call its witness?

MS. TORRES: Yes, you Honor. The government calls Arizona Robbins.

ARIZONA ROBBINS TAKES THE STAND.

CLERK OF THE COURT: Please state your name for the record.

MS. ROBBINS: Arizona Robbins

CLERK OF THE COURT: Please raise your right hand. Do you swear that the testimony you are about to give in this case will be the truth, the whole truth, and nothing but the truth, so help you God?

MS. ROBBINS: I do.

MS. TORRES: Good morning MS. ROBBINS.

MS. ROBBINS: Good morning.

MS. TORRES: Could you please state your occupation?

MS. ROBBINS: I am a general manager at Verizon in its Security Assistance department.

MS. TORRES: How long have you worked at Verizon?

MS. ROBBINS: I have been with the company for a little over fifteen years now.

MS. TORRES: What does your job entail?

MS. ROBBINS: I am in charge of responding to legal demands served by US federal, state, local, and tribal law

enforcement. When we get a warrant or a subpoena, it is my job to coordinate an appropriate response.

MS. TORRES: Where is your office located?

MS. ROBBINS: My office is in Detroit Michigan, but my department is across the country, I manage over two hundred employees.

MS. TORRES: Your Honor, may I show the witness what has been previously marked as United States Exhibit 1?

JUDGE: Mr. Karev, have you seen this document?

MR. KAREV: Yes, Your Honor.

JUDGE: Ms. Torres, you may display the document.

MS. TORRES PROJECTED THE DOCUMENT ONTO THE WITNESS' SCREEN

MS. TORRES: For the record, the government is displaying United States Exhibit 1, which depicts Verizon documents, on the witness's screen. Ms. Robbins, are you familiar with these documents?

MS. ROBBINS: Yes, these are Verizon subscriber records for telephone numbers 989-222-2222 and 989-333-3333 for the month of July 2024. Verizon received a subpoena for records associated with these two phone numbers. These are the records that were submitted to the government in response to that subpoena.

MS. TORRES: What sort of records are these?

MS. ROBBINS: They are personal phone records from two individual subscribers.

MS. TORRES: Does Verizon normally retain records from individual subscribers?

MS. ROBBINS: Yes, we do. Our normal document retention policies are to keep account registration records for seven years after an account is closed.

MS. TORRES: When did Verizon receive the request for these records?

MS. ROBBINS: On September 4, 2024.

MS. TORRES: Who retrieved these records in response to the subpoena?

MS. ROBBINS: I did.

MS. TORRES: Does Verizon keep these records in the regular course of its business?

MS. ROBBINS: Yes.

MS. TORRES: The government moves to admit these Verizon records as United States Exhibit 1.

MR. KAREV: Objection, hearsay, your Honor.

MS. TORRES: Your Honor, the government has established that these are business records.

THE COURT: Overruled, Exhibit 1 is admitted.

MS. TORRES: Could the Clerk please display United States Exhibit 1 to the court and the jury?

THE CLERK OF THE COURT PROJECTED UNITED STATES EXHIBIT 1

MS. TORRES: Who, if anyone, do these records pertain to?

MS. ROBBINS: The first 989-333-3333 number is registered to Christina Yang, and the 989-222-2222 number is registered to Meredith Grey.

MS. TORRES: Thank you Ms. Robbins, the government has no more questions.

THE COURT: Mr. Karev?

MR. KAREV: No questions.

THE COURT: Thank you Ms. Robbins, you are dismissed.

THE COURT: Is the government ready to call its next witness?

MS. TORRES: Yes, your Honor. The government calls Dr. Christina Yang.

DR. CHRISTINA YANG TAKES THE STAND.

CLERK OF THE COURT: Please state your name for the record.

DR. YANG: Christina Yang.

CLERK OF THE COURT: Please raise your right hand. Do you swear that the testimony you are about to give in this case will be the truth, the whole truth, and nothing but the truth, so help you God?

DR. YANG: I do.

MS. TORRES: Good morning Dr. Yang.

DR. YANG: Good morning.

MS. TORRES: Could you please state your occupation?

DR. YANG: I am a general medicine practitioner, a doctor.

MS. TORRES: Did you have to complete formal education to become a doctor?

DR. YANG: Yes, I had to go to college to get my bachelors degree, then I went to medical school for four years, and then I did residency before passing board exams and receiving my license.

MS. TORRES: Where did you go to school for your undergraduate degree?

DR. YANG: I went to the University of Michigan.

MS. TORRES: What did you study there?

DR. YANG: I studied biochemistry.

MS. TORRES: And how long did it take you to complete your degree?

DR. YANG: I started in 2004 and graduated in 2009. It is a tough major, so I had to do an extra year to complete all the requirements.

MS. TORRES: And where did you go to medical school?

DR. YANG: I went to the University of Washington Medical School.

MS. TORRES: And how long was your education there?

DR. YANG: I started in 2009 and graduated in 2013, so four years.

MS. TORRES: And where did you complete your residency?

DR. YANG: I was paired up with the University of Michigan, my first choice, since they have a great Family Medicine practice, which is what I wanted to do. Plus, I wanted to be back in Michigan.

MS. TORRES: How long was your residency program?

DR. YANG: I started in 2013 right after graduating, and spent the next three years there.

MS. TORRES: What kind of medicine are you practicing?

DR. YANG: I am doing Family Medicine.

MS. TORRES: How long have you been practicing medicine?

DR. YANG: I started practicing in 2016, after I completed my residency.

MS. TORRES: Where do you presently practice medicine?

DR. YANG: My office is located in Lincoln, Michigan. It is a small town in rural Michigan.

MS. TORRES: And where do you reside?

DR. YANG: I live in the same town, Lincoln, Michigan.

MS. TORRES: How long have you lived and practiced medicine in Lincoln?

DR. YANG: Ever since I completed my medical training, so since 2016.

MS. TORRES: What does practicing medicine in Lincoln, Michigan entail?

DR. YANG: It is a small town, and I am the only doctor there, so I am pretty much the town's doctor. I also see people from some of the surrounding communities.

MS. TORRES: Could you please elaborate on what exactly you treat?

DR. YANG: Sure, I currently have over 1200 patients. It is mostly annual and semi-annual physical exams, cold and flu viruses, or initial symptoms for any illnesses. I do see quite a few patients with diabetes and heart conditions. I see patients of all ages, from infants to the elderly. I examine patients, and if I see any concerns, I prescribe further medical tests and refer them to a specialized practitioner.

MS. TORRES: Without disclosing any confidential information, is there a particular type of patient that you see?

DR. YANG: As I said, I treat the entire town of Lincoln and the surrounding rural communities, which include the towns of Fillion, Popple, and Kinde. I am their first stop when it comes to medical issues. I treat elderly people, children, adults. Basically everyone who resides permanently in Lincoln and around it.

MS. TORRES: And what sorts of procedures or appointments do you perform the most?

DR. YANG: General exams are a big one, around fall and winter, we get lots of patients with cold and flu symptoms. Vaccinations are another big category.

MS. TORRES: Could you tell the court more about your practice when it comes to vaccinations?

DR. YANG: Sure, the bulk of vaccinations, as you might think, are in the fall and winter, they are flu and COVID-19 vaccines. Though in 2021, summer was a busy season as COVID-19 vaccines were approved. I am also responsible for a vaccine schedule for newborns and young children, primarily the vaccines that were not delivered at the hospital at birth.

MS. TORRES: How well do you know the population of Lincoln, Michigan?

DR. YANG: Well, as I mentioned before, it is a small town, so my patients are my neighbors. I run into them every time I do errands like grocery shopping and mail pick up. Some of them I have become good friends with. It is a small town, so everyone knows everyone.

MS. TORRES: Could you tell the court if there is anyone present here in the courtroom that you personally know?

DR. YANG: Well yes, Ms. Grey.

MS. TORRES: How do you know Ms. Grey?

DR. YANG: She is a resident of Lincoln. She is a very active member of the community.

MS. TORRES: Could you describe your experiences with Ms. Grey?

DR. YANG: As I mentioned, Ms. Grey is a very active member of the community. She is very vocal about various controversial issues, the big one that impacts me directly is vaccinations. I am a doctor, so it is my job to offer preventative care to my patients. On numerous occasions, Ms. Grey has protested vaccine administration in front of my office.

MS. TORRES: How do you feel about it?

DR. YANG: Well, I have a job and responsibilities to my community. I do not agree with her stance, but it is her

right, as long as she does not get in the way of me performing my duties. I am not out there trying to subvert her activism.

MS. TORRES: Did there ever come a time when Ms. Grey contacted you directly?

DR. YANG: Sure, in July 2024, I was at home when I received an unpleasant text from Meredith.

MS. TORRES: When you say "Meredith," do you mean Ms. Grey?

DR. YANG: Oh sorry, yes, Ms. Grey. I received a text from Ms. Grey accusing me of disabling children through vaccinations that kill people.

MR. KAREV: Objection, your Honor. It hasn't been established that my client sent the texts. Also it's hearsay-the texts aren't in evidence.

THE COURT: Ms. Torres?

MS. TORRES: I'll lay the foundation, Your Honor. Before you proceed, Dr. Yang, could you tell the court and the jury how you knew the messages were from Ms. Grey?

DR. YANG: We are neighbors, and when I first moved to Lincoln, we exchanged our phone numbers, you know, in case of emergencies or anything like that.

MS. TORRES: Do you know Ms. Grey's phone number?

DR. YANG: After all this, I know it by heart. It is 989-222-2222.

MS. TORRES: Did you ever, before July 2024, exchange texts with Ms. Grey?

DR. YANG: Yes, I did.

MS. TORRES: When did you exchange those texts?

DR. YANG: Um, I believe we texted each other a number of times over the years, probably every few months since I moved to Lincoln and we became neighbors.

MS. TORRES: What was the subject matter of those texts, the ones you sent in prior years?

MR. KAREV: Objection, hearsay.

MS. TORRES: Your Honor, it's not being offered for the truth, but as foundation for Dr. Yang's belief that it was Ms. Grey texting her.

THE COURT: Overruled. Please continue, Dr. Yang.

DR. YANG: Well we've texted about any number of things. I think she once texted when she was doing some work on her house to let me know there might be some construction noise. And we texted when there was a blackout on our street. I texted to let her know I had called the power company. And when I first moved, I texted her a few times to ask her for advice, like if she knew of someone I could hire to mow my yard. Things like that.

MS. TORRES: Do you know how many times you and Ms. Grey have texted each other before?

DR. YANG: I don't know the exact number, I would need to look at my phone.

MS. TORRES: Is it more or less than ten?

DR. YANG: It's more than ten.

MS. TORRES: Is it more or less than twenty?

DR. YANG: I would say more than twenty.

MS. TORRES: More than fifty?

DR. YANG: That I don't know, it might be less than fifty, but I would need to look.

MS. TORRES: Ok, that's fine, no need to look. Your Honor, may I show this document, marked United States Exhibit 2, to the witness?

THE COURT: Mr. Karev, has the Government provided you with a copy of this document?

MR. KAREV: Yes, Your Honor. The Defense objects to its introduction as evidence, however.

THE COURT: On what basis?

MR. KAREV: Lack of independent verification.

MS. TORRES: Your Honor, Dr. Yang can verify the authenticity of these images.

THE COURT: You may object. Go ahead, Ms. Torres, you may show the witness.

MS. TORRES PROJECTED THE DOCUMENT ONTO THE WITNESS' SCREEN

MS. TORRES: For the record, the government is displaying US Exhibit 2, which depicts an image of an electronic message, to the witness. Ms. Yang, have you seen this image before?

DR. YANG: Yes. This is the message that Ms. Grey sent to me on July 13.

MS. TORRES: So this is an accurate representation of the message you received from phone number 989-222-2222?

DR. YANG: Yes.

MS. TORRES: The number you believe to belong to Meredith Grey?

DR. YANG: Yes.

MS. TORRES: I move to admit the document, showing the message sent on July 13, 2024, into evidence.

MR. KAREV: Objection, lack of independent verification.

THE COURT: Overruled. Dr. Yang is testifying that the images are an accurate representation of the messages she received, and we have admitted evidence that the phone number belongs to Meredith Grey. The document is admitted as United States Exhibit 2.

MS. TORRES: Could the Clerk please display United States Exhibit 2 to the court and the jury?

THE CLERK OF THE COURT PROJECTED UNITED STATES EXHIBIT 2

MS. TORRES: Dr. Yang, could you please read the content of this message?

DR. YANG: It says, "What you are doing is wrong!!! You intentionally disabling our children and making them autistic. As a doctor, you should know better than vaccinating our kids and pushing covid vaccines on everyone. I have told you before to stop, but nothing is changing. I wish someone would take the matter into their own hands and destroy you and your entire practice that kills people."

MS. TORRES: Thank you. Could you please describe what happened in July 2024 when you received this message?

DR. YANG: Honestly, I did not really take it seriously because it is something I have heard from her before. I did peek outside to check if she was at home because I can see her house from my property, and her living room lights were on. I thought it was a strange text, but nothing more of it.

MS. TORRES: Do you know what day you got that message?

DR. YANG: I do vividly, it was a mid-July Saturday, the 13th I think. Yes, it was July 13th, I remember because it was the Wimbledon finals, and I love tennis.

MS. TORRES: Did there ever come a time when you got other messages that you believed to have come from Ms. Grey?

DR. YANG: Yes. Towards the end of the month, I remember it was a Sunday evening and I was relaxing at home, I received more texts from her.

MS. TORRES: Do you know the date of those second messages?

DR. YANG: It was July 28th.

MS. TORRES: Your Honor, may I show this document, marked United States Exhibit 3, to the witness?

THE COURT: Mr. Karev, has the Government provided you with a copy of this document?

MR. KAREV: Yes, Your Honor. The Defense will object to this as well.

THE COURT: You may object. Go ahead, Ms. Torres, you may show the witness.

MS. TORRES PROJECTED THE DOCUMENT ON TO THE WITNESS' SCREEN

MS. TORRES: For the record, the government is displaying US Exhibit 3, which depicts an image of text messages to the witness. Ms. Yang, have you seen these images before?

DR. YANG: Yes. These are the messages that Ms. Grey sent to me on July 28.

MS. TORRES: So this is an accurate representation of the message you received from phone number 989-222-2222?

DR. YANG: Yes.

MS. TORRES: The number you believe to be registered to Meredith Grey?

DR. YANG: Yes.

MS. TORRES: I move to admit the document, showing the messages sent on July 28, 2024, into evidence.

MR. KAREV: Objection, lack of independent verification.

JUDGE: Overruled. The document is admitted as United States Exhibit 3.

MS. TORRES: Could the Clerk please display United States Exhibit 3 to the court and the jury?

THE CLERK OF THE COURT PROJECTED UNITED STATES EXHIBIT 3

MS. TORRES: Dr. Yang, can you please read these messages?

DR. YANG: The first one says, "I am going to do what must be done to stop you from destroying our children's lives." The next says, "You and your practice are going to cease to exist any day now. I have tried to peacefully convince you to stop vaccinating and poisoning our community, but you did not listen. We were doing fine without you here. Once you gone, the natural order will resume." The last says, "You were warned, it is too late now to change anything. You reap what you sow."

MS. TORRES: And how did you react to the messages on July 28th?

DR. YANG: It was different this time, she was saying how she would take matters into her own hands, and that my practice will cease to exist any day now. I had chills when I read the texts. Multiple scenarios ran through my head, arson, bomb, and that sort. They screamed violence to me.

MR. KAREV: Objection, Your Honor.

THE COURT: Sustained as to the last sentence. The jury should disregard Dr. Yang's last sentence.

MS. TORRES: Dr. Yang, how did you react when you received the texts?

DR. YANG: Well, before that day I did not think Meredith was a violent person, but now I had texts in front of me that told me that she was planning something. I even went to check if my door was locked. I was not going to wait and do nothing, so I decided to report it, just so you know, there is at least some record out there, should anything happen.

MS. TORRES: And did you see anything when you went to check your locks?

DR. YANG: Well, not really, she was at home though.

MS. TORRES: By "she" do you mean Ms. Grey?

DR. YANG: Yes.

MS. TORRES: How did you know she was at home?

DR. YANG: Because I saw her lights were on and I saw her silhouette through the window. She lives alone.

MS. TORRES: So you were scared for your life - was there anything in particular that made you afraid?

DR. YANG: The July 28th messages. I did not feel safe after reading them.

MS. TORRES: Thank you, Dr. Yang. The Government has no further questions.

THE COURT: Mr. Karev.

MR. KAREV: Good morning Dr. Yang.

DR. YANG: Good morning.

MR. KAREV: Is Ms. Grey your neighbor?

DR. YANG: Yes.

MR. KAREV: You have known Ms. Grey for about nine years, correct?

DR. YANG: Yes.

MR. KAREV: And in that time, have you ever felt unsafe or threatened by Ms. Grey?

DR. YANG: No, not really. Not until I received these texts.

MR. KAREV: But during that time has Ms. Grey always been an active member of the community?

DR. YANG: Yes.

MR. KAREV: Has she maintained her anti-vaccination stance for as long as you have known her?

DR. YANG: Yes

MR. KAREV: And during that time, has she ever personally threatened you or made you feel unsafe?

DR. YANG: No, but...

MR. KAREV: Yes or no will suffice. Could the Clerk please display Exhibit 2 again?

MR. KAREV: Dr. Yang, could you please read the message?

DR. YANG: What you are doing is wrong!!! You intentionally disabling our children and making them autistic. As a doctor, you should know better than vaccinating our kids and pushing covid vaccines on everyone. I have told you before to stop, but nothing is changing. I wish someone would take the matter into their own hands and destroy you and your entire practice that kills people.

MR. KAREV: And you testified that you did not really take it seriously, is that correct?

DR. YANG: Yes, but...

MR. KAREV: Dr. Yang, it is a simple yes or no question.

DR. YANG: Yes.

MR. KAREV: And you mentioned that the texts on July 28th made you feel fearful, is that correct?

DR. YANG: Yes, that's correct.

MR. KAREV: But, you did not report them until August 3rd, is that correct?

DR. YANG: Yes.

MR. KAREV: And between July 28th and August 3rd, did you close your practice?

DR. YANG: No.

MR. KAREV: So you felt fearful for your life on July 28th, but continued with business as usual until August 3rd?

MS. TORRES: Objection your Honor.

MR. KAREV: Withdrawn. Did you wait until August 3rd to report?

MS. TORRES: Objection, asked and answered.

THE COURT: Overruled, please answer.

DR. YANG: Yes.

MR. KAREV: Your Honor, defense has no further question.

THE COURT: Ms. Torres do you have any further questions?

MS. TORRES: Yes, your Honor, just one.

THE COURT: Okay.

MS. TORRES: Dr. Yang, why did you wait until August 3rd to report?

DR. YANG: Well, I just did not know what to do. I was hesitant at first. I've lived next to Meredith for a long time, and I felt really unsure if getting the police involved would be the right thing to do. Plus it was Sunday evening, and I simply did not have the time to drive to the nearby town to the police station, you know. But I made the report the following Saturday because I was on edge and scared all week. I was also encouraged to report by folks in my office.

MS. TORRES: Thank you, Dr. Yang. Prosecution has no further questions.

THE COURT: Thank you, Dr. Yang, you are free to go.

THE COURT: Is the government ready to call its next witness?

MS. TORRES: Yes, your Honor. The government calls FBI Special Agent Derek Shephard.

DEREK SHEPHERD TAKES THE STAND

CLERK OF THE COURT: Please state your name for the record.

MR. Shepherd: Derek Shepherd.

CLERK OF THE COURT: Please raise your right hand. Do you swear that the testimony you are about to give in this case will be the truth, the whole truth, and nothing but the truth, so help you God?

MR. SHEPHERD: I do.

MS. TORRES: Good morning Mr. Shepherd.

MR. SHEPHERD: Good morning.

MS. TORRES: Could you please state your occupation?

MR. SHEPHERD: I am a Special Agent for the Federal Bureau of Investigation.

MS. TORRES: What office do you work in?

MR. SHEPHERD: I work out of Detroit's Field Office.

MS. TORRES: How long have you been a Special Agent?

MR. SHEPHERD: I started working for the FBI in Detroit in September, 2019.

MS. TORRES: Do you specialize in any particular crimes?

MR. KAREV: Objection, unfairly prejudicial.

THE COURT: Sustained.

MS. TORRES: What kind of training have you received to become a special agent?

MR. KAREV: Objection, leading.

THE COURT: Sustained.

MS. TORRES. Have you received any particular training as a special agent?

MR. SHEPHERD: I completed a standard 21-week new agent training at Quantico Virginia. It is a comprehensive program. I received training in legal statutes and procedures, physical and electronic surveillance techniques, and confidential source management. I have also completed an 11-day Internet Investigation Program in Glynco, Georgia, as well as an online Cyber Crime Investigations Course. Both programs focus on the history and workings of the Internet. The difference is the IITP emphasizes examining and collecting data from social media and the dark web, while CCIC is designed to improve technical knowledge, such

as investigative tools and techniques relevant to cybercrime investigations.

[ADDITIONAL TESTIMONY REGARDING TRAINING AND EXPERIENCE OMITTED.]

MS. TORRES: What is the nature of your day to day work?

MR. SHEPHERD: I investigate cases as assigned to me by my supervising agent or the head of the field office.

MS. TORRES: Did there ever come a time when you investigated messages received by Dr. Christina Yang?

MR. SHEPHERD: Yes. On August 8, 2024, Keppner assigned me to investigate this case and asked me to look into the messages received by Dr. Yang.

MS. TORRES: Who is Keppner?

MR. SHEPHERD: Special Agent April Keppner. She's the head of the field office.

MS. TORRES: Could the Clerk please display the Government's Exhibit 2?

THE CLERK OF THE COURT PROJECTED UNITED STATES EXHIBIT 2

MS. TORRES: Mr. Shepherd, could you please take a look at the screen and tell us whether you recognize what appears on it?

MR. SHEPHERD: Yes, this is e one of the messages that I was investigating in connection with Dr. Yang's report. I saw it on Dr. Yang's phone.

MS. TORRES: What was the date of this message?

MR. SHEPHERD: July 13, 2024.

MS. TORRES: Could the Clerk please display what has previously been marked as Government's Exhibit 3?

THE CLERK OF THE COURT PROJECTED UNITED STATES EXHIBIT 3

MS. TORRES: Mr. Shepherd, could you please take a look at the screen and tell us whether you recognize what appears on it?

MR. SHEPHERD: Yes, these are the messages sent on July 28, 2024 to Dr. Yang. I saw them on Dr. Yang's phone during my investigation.

MS. TORRES: What were the steps you took to investigate this case?

MR. SHEPHERD: I first familiarized myself with the file that was sent over, including the screenshot of the messages and Dr. Yang's report. Later, I interviewed Dr. Yang and saw the messages on her phone. They were sent by phone number 989-222-2222. I also visited and interviewed Ms. Grey.

MS. TORRES: When and where did you speak with Ms. Grey?

MR. SHEPHERD: I met with her at her home on August 28, 2024.

MS. TORRES: What information, if any, did you gather from Ms. Grey?

MR. KAREV: Objection, calls for hearsay.

THE COURT: Mr. Karev, you know as well as I do that Mr. Shepherd can testify as to admissions by the defendant. Overruled. Mr. Shepherd, you may answer.

MR. SHEPHERD: Ms. Grey acknowledged sending the messages.

MS. TORRES: The ones we just saw?

MR. SHEPHERD: Yes, the one on July 13 and the three on July 28.

[ADDITIONAL DIRECT TESTIMONY OMITTED]

MS. TORRES: Prosecution rests. Thank you Mr. Shepherd.

THE COURT: Is defense ready to cross examine?

MR. KAREV: Yes, your Honor. Good afternoon Mr. Shepherd.

MR. SHEPHERD: Good afternoon.

MR. KAREV: You testified that simply by looking at the color of the text messages you determined that the Internet was used to send said texts. Is that correct?

MR. SHEPHERD: Yes, it is a known feature of Apple communication devices. When there are messages from one iPhone to another, they are transmitted online over the Internet. They are not actually text messages, which are sent over cellular phone networks.

MR. KAREV: But when you say they were transmitted over the Internet, you don't actually know the path those messages took, do you?

MR. SHEPHERD: I'm not sure I understand. The messages went from Ms. Grey to Dr. Yang.

MR. KAREV: You interviewed both Dr. Yang and Ms. Grey at their homes, correct?

MR. SHEPHERD: Yes.

MR. KAREV: And they live on the same street. They both live in Lincoln, Michigan, correct?

MR. SHEPHERD: Yes, that's correct.

MR. KAREV: And so your testimony is that the messages traveled down the street from Ms. Grey to Dr. Yang?

MR. SHEPHERD: Well the messages are electronic, they go over the Internet through servers, as I testified, but yes, they went from Ms. Grey to Dr. Yang.

MR. KAREV: Okay, but when you say that the signal was electronic, all you know about its path is that it started

in Lincoln, Michigan and then it ended in Lincoln on the exact same street. Isn't that right?

MR. SHEPHERD: Yes, that's right.

MR. KAREV: You testified that you interviewed Dr. Yang in person. During your interview with Dr. Yang, did she appear fearful to you?

MR. SHEPHERD: A little, but she was composed.

MR. KAREV: Thank you, Mr. Shepherd. Defense has no further questions.

THE COURT: Is the government ready to call its next witness?

MS. TORRES: Yes, your Honor. The prosecution calls George O'Malley.

GEORGE O'MALLEY TAKES THE STAND

CLERK OF THE COURT: Please state your name for the record.

MR. O'MALLEY: George O'Malley.

CLERK OF THE COURT: Please raise your right hand. Do you swear that the testimony you are about to give in this case will be the truth, the whole truth, and nothing but the truth, so help you God?

MR. O'MALLEY: I do.

MS. TORRES: Good afternoon, Mr. O'Malley.

MR. O'MALLEY: Good afternoon.

MS. TORRES: Could you please state your occupation?

MR. O'MALLEY: I am a digital forensic expert for the FBI.

MS. TORRES: How long have you worked as a digital forensic expert for the FBI?

MR. O'MALLEY: I was recruited after I completed my masters back in 2012, so it would be thirteen years now.

MS. TORRES: And where do you work?

MR. O'MALLEY: I work out of the Detroit Field Office.

MS. TORRES: You just mentioned that you hold a master's degree.
What was your master's degree in?

MR. O'MALLEY: I studied cybersecurity.

MS. TORRES: Do you have any specialty within cybersecurity?

MR. O'MALLEY: Yes, I specialize in digital forensics,
specifically cloud and network security.

MS. TORRES: Did you write a Master's thesis?

MR. O'MALLEY: Yes.

MS. TORRES: What was the subject of your Master's thesis?

MR. O'MALLEY: I focused on Apple Network security and its
utilization of end-to-end encryption to protect its
customers' privacy.

MS. TORRES: In addition to your master's degree, do you hold
any other degrees?

MR. O'MALLEY: Yes, I have a bachelor's degree in computer
science.

MS. TORRES: Where did you earn your bachelor's degree?

MR. O'MALLEY: At the University of Washington, Seattle.

MS. TORRES: And what about your master's degree?

MR. O'MALLEY: I did that at RIT - that's the Rochester Institute
of Technology.

MS. TORRES: In addition to your two degrees, have you received
any other training in cybersecurity?

[ADDITIONAL TESTIMONY AND CROSS EXAMINATION REGARDING
EXPERIENCE AND CREDENTIALS OMITTED]

MS. TORRES: The Government moves to have Mr. O'Malley certified
as an expert in telecommunication systems.

MR. KAREV: No objection.

THE COURT: Okay, granted. Mr. O'Malley is certified as an
expert in telecommunications.

MS. TORRES: What specifically do you do at the FBI, Mr. O'Malley?

MR. O'MALLEY: My job is to assist special agents in their criminal investigations. I do everything from preserving, collecting, and analyzing digital evidence from various devices, including computers and mobile devices, to recovering deleted data and reconstructing digital events.

MS. TORRES: And could you tell the court how you got involved in this case?

MR. O'MALLEY: Yes, Agent Shepherd asked me to extract data from messages that were sent between two numbers.

MS. TORRES: And did you do it?

MR. O'MALLEY: Yes.

MS. TORRES: Which phone numbers were you looking at data from?

MR. O'MALLEY: 989-222-2222 and 989-333-3333.

MS. TORRES: Could the Clerk please display what has previously been marked as United States Exhibit 1?

THE CLERK OF THE COURT PROJECTED UNITED STATES EXHIBIT 1

MS. TORRES: Do you recognize this?

MR. O'MALLEY: Yes, this is a record from Verizon.

MS. TORRES: Can you remind us who 989-222-2222 is registered to?

MR. O'MALLEY: The subscriber for that number is Meredith Grey.

The subscriber for 989-333-3333 is Christina Yang.

MS. TORRES: Ok, going back to the two numbers, did you find anything in your investigation?

MR. O'MALLEY: Initially, I right away knew that both subscribers were utilizing Apple devices.

MS. TORRES: How did you discover that?

MR. O'MALLEY: Agent Shepherd forwarded me the screenshot of the communication, and you see, the messages appeared in blue,

which is a uniquely Apple product feature, meaning that the messages will only appear in blue if both the sender of the messages and the recipient use Apple devices.

MS. TORRES: And why do messages appear in blue?

MR. O'MALLEY: Unlike other device companies that rely on cellular towers to transmit communication, Apple uses its own servers or contracting servers, such as Google and Amazon servers, that rely on the Internet to transmit iMessages between users who use their devices.

MS. TORRES: And do you know whether there is a particular reason why Apple would use its own or contracting servers?

MR. O'MALLEY: Well yes, it is a more secure transmission, as the communication is encrypted on both ends, so no one unauthorized, meaning no one outside the sender and the recipient, could get access to the messages.

MS. TORRES: Did you do any other examinations?

MR. O'MALLEY: Well, yes, I also got physical access to Dr. Yang's phone, which she voluntarily provided. I examined the communication and confirmed that indeed the communication was through iMessages, which means Apple or contracted servers were used, which in turn means that the Internet was used to transmit the communications.

MS. TORRES: Could you please explain the difference between iMessages and text messages?

MR. O'MALLEY: Well yes, the main difference is that regular text messages use cellular towers to transmit communication. iMessages, on the other hand, use end-to-end encryption. This security feature is only possible because messages are transmitted using the Internet. Once a sender hits send, the message travels to an Apple server and from there to its recipient. It happens very quickly and seamlessly.

MS. TORRES: Thank you, Mr. O'Malley. Prosecution has no further questions.

THE COURT: Mr. Karev, the witness is yours.

Mr. Karev: You testified that Apple generally uses its own servers or other companies' servers to transmit communications between its device users, is that correct?

Mr. O'Malley: Yes.

Mr. Karev: And would it be correct to say that Apple utilizes thousands of such servers located all over the world?

Mr. O'Malley: That's correct.

Mr. KAREV: And there are servers located in Michigan?

Mr. O'Malley: Yes, I believe so.

Mr. KAREV: And would it be correct to say that when an iMessage is transmitted, it goes through the shortest path available to it to reach the recipient?

Mr. O'Malley: Yes, I think that's normally what happens.

Mr. KAREV: And did you trace the server path that Ms. Grey's texts went through to reach Dr. Yang?

Mr. O'MALLEY: No.

Mr. KAREV: So you actually have no idea which servers were used to send these messages.

Mr. O'MALLEY: That's correct.

Mr. KAREV: So it is possible that Ms. Grey's texts travelled only through servers located in Michigan, correct?

Mr. O'MALLEY: I suppose.

Mr. KAREV: Thank you, Mr. O'Malley, defense has no further questions.

THE COURT: Ms. Torres, do you have any redirect?

MS. TORRES: Yes, your Honor.

THE COURT: All right, but please stay within the testimony.

MS. TORRES: Do all Apple servers use the Internet to transmit user communication?

MR. O'MALLEY: If the phone is connected to a network, the messages always use the Internet to transmit.

MS. TORRES: And how do you know if a phone was connected to a network when messages were sent?

Mr. O'MALLEY: One way is most certainly if they appear in blue, that indicates a message sent over the Internet. As I mentioned before, it is a uniquely Apple feature. Also, we had the Verizon records for both phones. If these were text messages sent using Verizon's cellular network, then we would see something in the Verizon records about them. Not the actual content of the messages--that's not retained for long, if at all--but records showing that messages were being sent using the cellular networks. But you don't see that here because these were iMessages sent using the Internet.

MS. TORRES: And lastly, what does the shortest path available look like when messages are transmitted?

Mr. KAREV: Objection, previously asked and answered.

THE COURT: I'll allow it.

Mr. O'MALLEY: Well, the shortest path does not necessarily mean the texts use the servers that are the closest to the sender or recipient. The shortest path just means that the texts will use the least busiest servers. For example, you could send a text to me right now, and if the servers in the area are busier than the servers in Arizona, then the text will use the Arizona server to get to me because it would be the shortest route.

MS. TORRES: Thank you, Mr. O'Malley. Prosecution has no further questions.

THE COURT: Mr. O'Malley you are free to go. Thank you. Ms. Torres, I do not see any more witnesses listed. Is there anyone else?

MS. TORRES: No, your Honor. The prosecution rests its case.

THE COURT: We will take a 30-minute recess now. It is 2:09pm now, we will reconvene promptly at 2:40pm. Bailiff, please escort the jury to the jury room. As a reminder, jury members, please do not discuss the case with anyone.

(Jury exits the room.)

(Proceeding continues without the jury at 2:12pm.)

THE COURT: Do we have any outstanding legal issues to discuss that should be on the record? Ms. Torres?

MS. TORRES: No, your Honor.

THE COURT: Mr. Karev?

MR. KAREV: Yes, your honor. We have a few.

THE COURT: Okay, do we need more than 15-20 minutes? Should I inform the jury that proceedings will start later?

MR. KAREV: We are moving for a judgment of acquittal. It should not take long, but if Ms. Torres opposes, the back and forth could take some time.

THE COURT: Okay, bailiff, please inform the jury that the new time is 3pm. Mr. Karev, you may proceed.

MR. KAREV: Your Honor, Defense objects to sufficiency of government's evidence as to the interstate commerce element of the Interstate Communication Statute and moves for a

judgment of acquittal on the ground that the prosecution did not proffer sufficient evidence to prove statutory elements beyond reasonable doubt. In *United States v. Killingsworth*, the Sixth Circuit once again reaffirmed the elements of 18 U.S.C 875(c); the elements are: first - the defendant transmitted a communication in interstate or foreign commerce; second - the communication contained a threat; and third - the threat was to injure or kidnap another person. For the first element, the government completely failed to provide any evidence to establish that Ms. Grey communicated in interstate commerce. The government's evidence to prove the first statutory element comes down to Mr. Shepherd testifying that Ms. Grey used the Internet. There was no testimony or evidence that showed that the texts travelled to servers located in states other than Michigan.

THE COURT: Counsel, are you making the same argument you made in your Motion to Dismiss the Indictment?

MR. Karev: Essentially yes, but, your Honor, now the government-

THE COURT: I was just clarifying, please proceed

MR. KAREV: Thank you, your Honor. As I was saying, the government did not present any evidence to prove the interstate commerce element other than pointing out that iMessages utilize the Internet to transmit. This is a textbook case for a judgment of acquittal, your Honor.

THE COURT: Ms. Torres?

MS. TORRES: Your Honor, while there is a circuit split on the issue, the majority of circuits have adopted a per se rule when it comes to using the Internet, meaning that showing that the Internet was used is sufficient to prove that the iMessages crossed state lines. My co-counsel has the cases from each circuit ready for your Honor to review.

THE COURT: Are they the same cases the government cited in its brief opposing the motion to dismiss the indictment?

MS. TORRES: Yes, your Honor.

THE COURT: I am familiar with them. Mr. Karev, do you have any additional arguments not raised in the prior motion to dismiss?

MS. KAREV: Your Honor, the motion to dismiss the indictment carried a different burden of proof, mainly that a reasonable jury could disagree. Our argument now is that to legally prove the interstate commerce element beyond reasonable doubt, the government must actually show that the communication traveled through servers located in a state other than Michigan, which in this case did not happen. The Government alleges that Ms. Grey texted Dr. Yang within the confines of a small town - Lincoln has 821 residents. The government did not offer any evidence to show how the texts actually travelled outside the border of Michigan. Even though, as the government argues, some circuits have adopted a per se Internet rule, those cases are highly distinguishable as they concern images and videos transmitted on the dark web, using shadow applications. Even if the Sixth Circuit were to adopt a per se rule-which it has not-it wouldn't and shouldn't be

applied to the statute at hand. Otherwise, it would obliterate the distinction between what is national and what is local. Since the government did not provide a sliver of evidence that the texts actually travelled across state lines, this case belongs in state court.

THE COURT: Ms. Torres?

MS. TORRES: Your Honor, there is no reason to limit the per se rule to only child pornography cases since all of the statutes plainly state "in interstate commerce." This is a jurisdictional requirement, not a mens rea requirement.

MR. KAREV: May I?

THE COURT: Yes.

MR. KAREV: Your Honor, at least one Circuit has rejected the per se rule in a case concerning wire fraud. statute.[ADDITIONAL ARGUMENT OMITTED FROM THE RECORD]. This is a criminal statute with a direct impact on personal liberties, which requires it to be absolutely clear. The per se rule in the context of 875(c) would have a disproportionate impact. In our case, the defendant clearly was acting in the interest of her community, merely sending messages to a member of her community.

THE COURT: Mr. Karev, the Court has heard your arguments. You correctly stated that the motion to dismiss the indictment carries a different burden of proof. However, the Court has considered your argument and denies your motion for a judgment of acquittal based on alleged insufficiency of the evidence. The issue is preserved on appeal, if you so choose. Anything else?

MR. KAREV: No, your Honor.

MS. TORRES: We do not have anything.

THE COURT: It is 2:45pm now, I will see everyone back in the courtroom after the recess at 3pm.

[THE REST OF THE DAY 2 PROCEEDING, INCLUDING THE DEFENSE'S CASE, IS OMITTED]

TRIAL TRANSCRIPT DAY 3
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

----CR 3-25-128----

-v.-

MEREDITH GREY,

Defendant.

June 20, 2025

Transcript of Proceedings

TRIAL DAY 3

Before the Honorable Miranda Bailey

United States District Judge

APPEARANCES:

For the United States: Callie Torres

U.S. Attorney's Office

211 West Fort Street

Detroit, Michigan 48226

(313) 600-9215

For the Defendant: Alex Karev

Federal Community Defenders
Eastern District of Michigan
613 Abbott Street
Detroit, MI 48226
Phone: (313) 967-5542

Reported by: Preston Burke, RPR, CSR

Official Federal Court Reporter
Preston_Burke@mied.uscourts.gov

Detroit, Michigan

Friday, June 20, 2025 - 10:00 a.m.

[THE JURY IS ABSENT FROM THE PROCEEDING]

CLERK OF THE COURT: All rise. The United States District Court for the Eastern District of Michigan is now in session. This proceeding is United States of America v. Meredith Grey, number CR-3-25-128. The Honorable Miranda Bailey presiding.

THE COURT: Please be seated. I received your submissions regarding proposed jury instructions. You should have received the instructions that I plan to deliver to the jury. Have the government and defense received the document?

MS. TORRES: Yes, your Honor.

MR. KAREV: Yes, your Honor.

THE COURT: Does the government have any objections?

MS. TORRES: Your Honor on page 5, section 5(b), I think it is a clerical error, but it should say Grey.

THE COURT: Good catch, this is from my previous case. Mr. Karev?

MR. KAREV: Yes, your Honor, defense also flagged it. No objection to the change.

THE COURT: Okay. Ms. Torres, what else?

MS. TORRES: Nothing else from the government.

THE COURT: Mr. Karev?

MR. KAREV: Your Honor, on page 26, section 21(a), instruction on the statutory offense. It currently reads First, that the defendant transmitted communication in interstate commerce, meaning that the communication crossed state lines. Use of the Internet is adequate to demonstrate that the defendant transmitted the messages in interstate commerce.

THE COURT: Yes, I see.

MR. KAREV: Your Honor, I object to this instruction. Saying that the internet is adequate to demonstrate that the defendant transmitted the messages in interstate commerce would be an incorrect statement of law. The Sixth Circuit has never held that using the Internet automatically means that a message crossed state lines. Using this instruction would relieve the Government of its burden. They should have to prove that the messages actually crossed state lines, otherwise we're back to the same insufficiency issue.

THE COURT: Ms. Torres?

MS. TORRES: Your Honor, the Supreme Court has recognized the Internet as an instrumentality of interstate commerce. This Circuit has indicated in multiple opinions that the use of the Internet is sufficient to satisfy the interstate commerce requirements. The instruction is correct.

THE COURT: Mr. Karev, your objections are noted and preserved for appeal, but the Court will give the instruction as proposed to the jury. Bailiff please bring the jury to the courtroom.

[THE JURY IS BROUGHT IN]

THE COURT: Please be seated. You have now heard the prosecution and defense cases. Before you deliberate on whether the government has proven its case beyond a reasonable doubt, I will instruct you on the law. Please remember that your responsibility is to judge the facts, and you must base your decisions on the evidence that the prosecution and the defense offered in the last two days of the trial.

[PRELIMINARY JURY INSTRUCTIONS OMITTED]

THE COURT: Now I will instruct you on the charged statutory offense. The defendant is charged in Count One of the indictment with transmitting in interstate commerce a threatening communication to a person in violation of Section 875(c) of Title 18 of the United States Code. In order for the defendant to be found guilty of that charge, the government must prove each of the following elements beyond a reasonable doubt: First, that the defendant transmitted communication in interstate commerce, meaning that the communication crossed state lines. Use of the Internet is adequate to demonstrate that the defendant transmitted the messages in interstate commerce. Second, the defendant knowingly transmitted a series of iMessages containing a threat to injure Dr. Christina Yang, meaning that the defendant knew that she was sending the iMessages and said iMessages contained a threat to Dr. Yang's physical well-being. Third, such iMessages were transmitted for the purpose of issuing a threat, or with knowledge that the iMessages would be viewed as a threat, meaning that the defendant either intended the iMessages to be threatening or, alternatively, knew that Dr. Yang would view them as a threat. The government need not prove that the defendant intended to carry out the threat.

[REMAINING JURY INSTRUCTIONS OMITTED].

[THE FOLLOWING PROCEEDINGS HAVE BEEN OMITTED: JURY DISMISSED FOR DELIBERATIONS. COURT IN RECESS. JURY RETURNS. GUILTY VERDICT RENDERED. (SEE VERDICT FORM). JURORS POLLED AND THEN DISCHARGED.]

THE COURT: Now that the jury is dismissed, are there any outstanding legal or administrative issues that we need to discuss? Ms. Torres?

MS. TORRES: No, your Honor.

THE COURT: Mr. Karev?

MR. KAREV: Yes, your Honor, the defense will be renewing its objection as to the sufficiency of evidence in regards to the interstate commerce element by moving for a judgment of acquittal notwithstanding the verdict.

THE COURT: Will you be filing a brief?

Mr. Karev: Yes, your Honor.

THE COURT: Well then, I will review the briefing in due course. Anything else?

MR. KAREV: No, your Honor.

THE COURT: The court is adjourned.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

CR 3-25-128

UNITED STATES OF AMERICA

v.

MEREDITH GREY

VERDICT OF THE JURY

Answer “Guilty” or “Not Guilty” with respect to the defendant, Meredith Grey.

Count 1:

Whoever transmits in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another, shall be fined under this title or imprisoned not more than five years, or both.

 X Guilty Not Guilty

**[MOTION FOR A JUDGMENT OF ACQUITTAL NOTWITHSTANDING THE
VERDICT BRIEFING IS OMITTED FROM THE RECORD]**

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

UNITED STATES OF AMERICA

-v.-

MEREDITH GREY,

Defendant.

----CR 3-25-128----

Hon. Miranda Bailey
United States District Judge

OPINION AND ORDER

On June 20, 2025, the jury delivered a guilty verdict, convicting Meredith Grey of violating 18 U.S.C. § 875(c). On July 3, 2025, pursuant to Federal Rule of Criminal Procedure 29, Defendant filed a Motion for Judgment of Acquittal Notwithstanding the Verdict, arguing that the jury instruction on interstate commerce was incorrect and thus relieved the government of its burden to prove that the messages crossed state lines, and that the government also failed to proffer sufficient evidence to prove that the communication actually crossed state lines. (ECF No. 53). On July 11, 2025, the Government filed its response, arguing that the jury instruction correctly stated the law and that the evidence was sufficient for a reasonable jury to conclude that Defendant's use of the Internet constituted interstate commerce. (ECF No. 54). The Court, having reviewed the briefing, denies Defendant's motion.

[COURT'S REASONING IS OMITTED FROM THE RECORD]

For the stated reasons, the Court denies motion to dismiss.

Dated: July 15, 2025

/s/ Miranda Bailey

MIRANDA BAILEY

UNITED STATES DISTRICT JUDGE

PRE-SENTENCE REPORT
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

-v.-

MEREDITH GREY,

Defendant.

----CR 3-25-128----

Hon. Miranda Bailey
United States District Judge

Prepared For: Hon. Miranda Bailey
U.S. District Judge

Prepared By: Richard Weber
100 Main Street, Suite 100
Ann Arbor, MI 48106

Assistant U.S. Attorney
Callie Torres
U.S. Attorney's Office
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211 W. Fort Street, Suite 2001
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Phone: (313) 226-9100

Defense Counsel
Alex Karev
Federal Community Defenders
Eastern District of Michigan
613 Abbott Street
Detroit, MI 48226
Phone: (313) 967-5542

Sentence Date: July 29, 2025
Offense: Count 1: Threatening to injure a person through interstate communications in violation of 18 U.S.C. § 875(c)
Release Status: Detained
Related Cases: None
Date Report Disclosed: 7/14/2025

Identifying Data:

Name: Meredith Grey
Date of Birth: 08/05/1975
Age: 49
Race: White
Sex: Female
Education: High School Diploma
Dependents: None
Citizenship: U.S.
Permanent Address: 4247 N Racoon Trl
Lincoln, MI 48742
Aliases: None

PART A – OFFENSE

Charge(s) and Conviction(s)

1. On November 3, 2024, a grand jury in the Eastern District of Michigan returned an indictment against Meredith Grey, charging her with one count of threatening to injure a person through interstate communications in violation of 18 U.S.C. § 875(c).
2. On June 20, 2025, the defendant was convicted by a jury of one count of threatening to injure a person through interstate communications in violation of 18 U.S.C. § 875(c).

Codefendants

3. None

Related Cases

4. None

The Offense Conduct

5. Meredith Grey used the Internet to transmit communication threatening Dr. Christina Yang with physical injury.
6. On July 13, 2024, Ms. Grey sent Dr. Yang an iMessage stating, “What you are doing is wrong!!! You intentionally disabling our children and making them autistic. As a doctor, you should know better than vaccinating our kids and pushing covid vaccines on everyone. I have told you before to stop, but nothing is changing. I wish someone would take the matter into their own hands and destroy you and your entire practice that kills people.”
7. On July 28, 2024, Ms. Grey sent a series of iMessages, stating: “I am going to do what must be done to stop you from destroying our children’s lives.”; “You and your practice are going to cease to exist any day now. I have tried to peacefully convince you to stop vaccinating and poisoning our community, but you did not listen. We were doing fine without you here. Once you gone, the natural order will resume.”; and “You were warned, it is too late now to change anything. You reap what you sow.”

Victim Impact

8. Dr. Christina Yang is an Asian, female resident of Lincoln, Michigan, born in 1987 to Charles and Rose Yang. She is the only family medicine physician in Lincoln. She has testified that the messages made her feel unsafe performing her duties as a physician.

Obstruction of Justice

9. There is no information to suggest the defendant impeded or obstructed justice.

Acceptance of Responsibility

10. The defendant has not accepted responsibility for the actions of which she was convicted.

Offense Level Computation

[LINES 11 THROUGH 18 CONCERNING SENTENCE GUIDELINES CALCULATIONS ARE OMITTED FROM THE RECORD]

PART B—DEFENDANT’S CRIMINAL HISTORY

Juvenile Adjudications

19. None

Other Delinquent Conduct

20. None

Adult Convictions

21. None

PART C – OFFENDER CHARACTERISTICS

Personal and Family Data

22. Meredith Grey was born on August 5, 1975, to Bill Grey and Sarah Ricketts in Cheboygan, Michigan. She is an only child. Grey’s parents are both deceased.
23. Meredith Grey married Carl Grey in 2000 and gave birth to their only son, Steven Grey, the following year. Meredith and Carl raised Steven in their home until he graduated from high school in 2020.
24. Meredith and Carl separated in 2024. Their divorce has not been finalized, but they do not live together and state that they have separate lives.
25. Meredith Grey states that she is close to Steven, who is now in his early twenties. Steven has lived in the Philippines for the last two years working in international development. He reports that he has recently become engaged to a woman native to the Philippines, and he plans to live abroad indefinitely and start a family in the Philippines. Meredith Grey and Steven Grey communicate several times a week through Whatsapp texts and calls and consider themselves to be very involved in each other’s lives. Though Steven Grey reports that he had some knowledge of his mother’s online posts about the covid vaccine, he was unaware of the messages she sent to Dr. Yang and had no role in her criminal conduct.

Physical Condition

26. The defendant is 5’9” and weighs 165 pounds. She has brown hair and brown eyes. She is in good health.

Mental and Emotional Health

27. The defendant has no recorded history of mental or emotional health problems and displays no current symptoms suggesting serious mental health problems.

Education and Vocational Skills

28. The defendant graduated from Central High School, Cheboygan, Michigan.

Employment Record

29. Meredith Grey was not employed from 2000 to 2021. Prior to her marriage in 2000, she worked as an administrative assistant for approximately six years. Since 2021, she has been employed as a cashier at Handy Foods in Lincoln, Michigan.

[FINANCIAL INFORMATION IS OMITTED FROM THIS RECORD]

PART D – SENTENCING OPTIONS

Statutory Provisions

28. Statutory maximum of 5 years' imprisonment (no mandatory minimum).

Guideline Provisions

29. Based on a total offense level of 12 and a Criminal History Category of I, the guideline range of imprisonment is 10-16 months.

PART E – FACTORS THAT MAY WARRANT DEPARTURE

31. The Probation Office recommends special conditions of supervised release prohibiting Ms. Grey from using the internet to communicate with others. Specifically, it requests that the following language be entered into the sentencing order as a special condition of supervised release: "The defendant shall not use the Internet as a means of communication during her term of supervision, except as necessary to obtain and maintain employment, which will require pre-approval by her probation officer."

Respectfully submitted,

/s/ Richard Webber

Richard Webber

U.S. Probation Officer

July 14, 2025

APPROVED BY:

/s/ Owen Hunt

Owen Hunt

Supervising U.S. Probation Officer

July 14, 2025

LETTER FROM STEVEN GREY

Steven Grey
Diosdado Macapagal Avenue
Pasay City, 1300 Metro Manila, Philippines
steven.grey@gmail.com

Hon. Miranda Bailey
United States District Judge

July 24, 2025

Dear Judge Bailey,

My name is Steven Grey, and I am Meredith Grey's only son. I understand that you presided over the trial that resulted in my mother's conviction earlier this year and that you will impose a sentence later this month. I am writing this letter to you in my personal capacity to provide a different perspective on who my mother really is and to express how much she means to me.

My relationship with my mom is a tremendously important part of my life. She is my closest advisor, my confidante, my support system, and my friend. Even though I currently live thousands of miles away from my mom in the Philippines, we still communicate nearly every day through Whatsapp calls and messages. My mom's advice, whether it be about career decisions or where to base my growing family, has been a crucial part of my young adulthood. When I proposed to my fiancée a few months ago, my mom was the very first person I called to share the good news. Throughout all the uncertainties of life, I have always known that my mom would be around to support me emotionally or financially. I am scared to imagine a future in which my mom is in prison and no longer available to celebrate my accomplishments with me or commiserate in my hardships.

When my mother has finished serving her sentence, I hope to support her the way she has always supported me, whether that be to find a new job or otherwise get back on her feet. Though I do not plan to move back to the United States anytime soon, I will remain in communication with my mother through Whatsapp. I was troubled to hear from my mother's lawyer that the government has suggested imposing restrictions on my mother after she is released from prison that will limit her internet access. If my mom is deprived of internet communications, I truly have no idea how our relationship will survive. Since my fiancée and I hope to have children together in the Philippines in the next few years, I have always imagined Whatsapp and Facetime as a critical link in fostering a relationship between my mom and the next generation of our family. It hurts my heart to think that this option may be taken away from us.

Given the reasons stated above, I ask that you impose a lenient sentence on my mother and allow her to access the internet after she is released. Thank you for your time and consideration.

Sincerely,

Steven Grey

Steven Grey

TRIAL TRANSCRIPT SENTENCING
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

-v.-

MEREDITH GREY,

Defendant.

----CR 3-25-128----

July 29, 2025

Transcript of Proceedings

SENTENCING HEARING

Before the Honorable Miranda Bailey

United States District Judge

APPEARANCES:

For the United States: Callie Torres

U.S. Attorney's Office
211 West Fort Street
Detroit, Michigan 48226
(313) 600-9215

For the Defendant: Alex Karev

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TABLE OF CONTENTS

<u>WITNESSES: UNITED STATES</u>	PAGE
None	
<u>WITNESSES: DEFENDANT</u>	
None	
<u>OTHER MATERIAL IN TRANSCRIPT:</u>	
Proceedings	72-79
<u>EXHIBITS:</u>	<u>Identified</u> <u>Received</u>
None	

Detroit, Michigan

Tuesday, July 29, 2025 - 11:16 a.m.

CLERK OF THE COURT: All rise. The United States District Court for the Eastern District of Michigan is now in session. The Honorable Miranda Bailey presiding.

Please be seated.

Calling the Criminal Action Number CR 3-25-128, United States of America versus Meredith Grey. Counsel, please state your appearances for the record.

MS. TORRES: Good morning. On behalf of the United States, Callie Torres.

THE COURT: Good morning.

MR. KAREV: Good morning, your Honor. Alex Karev on behalf of Meredith Grey. She's seated with me at the counsel table.

THE COURT: All right. Good morning, Mr. Karev. And good morning to you too, Ms. Grey. You may be seated. Today is the date set for sentencing in this matter. We have Case CR 3-25-128, United States versus Grey. Ms. Grey is in open court with counsel Alex Karev. The government is represented by Assistant United States Attorney Callie Torres. Richard Webber from the Probation Department is also here with us today. I will also add that members of Ms. Grey's family are present as well. To everyone visiting the courthouse today, welcome. We are here for purposes of sentencing after Ms. Grey was convicted at trial last month of violating 18 U.S.C. 875(c).

THE COURT: And, let's see, Mr. Karev, I think you -- I've got some objections that you have to the presentence report, and I don't know if they were resolved in any way, but if there's a record that needs to be made with regard to this matter, I'm prepared to hear what you have to say.

Mr. KAREV: Thank you, your Honor. We have reviewed the report, your Honor. We renew our objections as far as the report classifies the messages as interstate commerce. As we've argued throughout these proceedings, our position is that mere use of the Internet does not support a finding of interstate commerce.

THE COURT: Any objection to the report itself, Mr. Karev?

MR. KAREV: No objections to the report, your Honor, other than its suggestion of a special condition of supervised release.

THE COURT: And how about from the government?

MS. TORRES: No, Your Honor.

THE COURT: Okay. Let's talk about the special condition. Mr. Karev, I'll let you speak first on your client's behalf.

MR. KAREV: Thank you, Your Honor. As I mentioned in my pre-sentencing submission, we believe that the proposed special condition of supervised release, which is essentially a blanket Internet ban with a limited exception for employment-related use, is substantively unreasonable and raises serious constitutional questions. Frankly, I don't think it's even possible to live in the modern world without using the Internet. There are countless completely legitimate uses of the Internet, like booking appointments with the DMV, communicating medical information to healthcare workers, looking up information, paying electricity bills, and so on, that have nothing to do with Ms. Grey's conviction. It certainly does not further Ms. Grey's rehabilitation to keep her completely isolated. The ban is a greater deprivation of liberty than is reasonably necessary under the statute. Ms. Grey has learned from her mistakes and will happily agree to any condition

restricting her contact with Dr. Yang or barring her from making future threats. Could we narrow the condition to focus on the offense at hand and allow my client to successfully reintegrate into society upon her release?

THE COURT: Mr. Karev, let's not lose sight of the fact that the Internet was the very tool your client used to commit this crime in the first place. Nevertheless, I do agree that the restriction as proposed by Probation is too broad. I've decided to narrow the proposed condition to allow limited use of the Internet. This means that Ms. Grey may visit websites to obtain information and can click from page to page. And I'll make a carve-out that allows her to provide what I'm calling "discrete, non-expressive information" online. What I mean is that she can't use the internet to send messages, but she can enter her name, birthdate, address, phone number, email address, credit card number, or other basic information that might be needed to make a purchase or fill out a form. This would allow Ms. Grey to use the Internet on government websites to make appointments and obtain documents as well as make purchases. If she has a medical provider that uses a patient portal, this would allow her to enter her username and password to log in and access her records. What will not be tolerated, on the other hand, is any sort of expressive online communication from Ms. Grey. No social media posts, no online comments, no product reviews, no blogging. No writing on Facebook, Instagram, TikTok, WhatsApp, Telegram, or any other social media sites. She may not send emails or any kind of Internet-communicated chats, including iMessages. I believe that this will allow Ms. Grey to live an otherwise normal life upon release

without the temptation of falling into her old habits. And as we've already agreed, there will be a separate, limited carve-out for work-related Internet use. If she gets a job that requires her to send emails, then the probation officer can approve that when the time comes.

MR. KAREV: Your Honor, I appreciate that you've narrowed it somewhat, but I still object to this condition. This restriction impedes my client's ability to exercise her First Amendment rights under *Packingham v. North Carolina*. Moreover, it has serious implications for my client's ability to communicate with her family members. Ms. Grey has an adult son who works abroad in the Philippines, and since international telephone calls are prohibitively expensive, she relies on WhatsApp to make calls and send messages to him. If my client is prohibited from using the Internet for three years, she will not be able to maintain a relationship with her son. The two are incredibly close, and her son wants to be in touch with his mother as he begins to start a family of his own in the next few years. When Ms. Grey's son has small children, she will need to be able to communicate with them over voice and video platforms that use the Internet. I believe the Supreme Court has recognized a fundamental right to associate with family members, and you're depriving my client of the only way she can associate with her son and his family. Your Honor, I respectfully request that the special conditions be more narrowly tailored to allow Ms. Grey the opportunity to use the Internet to communicate with her family members and exercise her First Amendment right to use social media. At the very least, a probation officer

could supervise Ms. Grey's Internet access during her term of supervision.

MS. TORRES: Your Honor, the Government opposes Mr. Karev's request. Any further narrowing of the restrictions set forth by the court would unduly burden the probation officer assigned to Ms. Grey after she completes her term of incarceration. The Government believes that this would be a misuse of public resources, especially since the condition as it currently stands already sufficiently corresponds to the relevant statutory sentencing factors outlined in 18 U.S.C. § 3583.

THE COURT: Mr. Karev, I understand your concern, but I'm comfortable with my decision. Yes, the condition may limit your client in certain ways, but that's to be expected with any condition of supervised release. It may be hard to hear, but it's not uncommon for supervised release restrictions to affect some constitutional rights. Even if Ms. Gray has a constitutional right to post on social media or make Internet calls to her son-- and I don't necessarily agree that she does-- that has no bearing on what supervised release conditions I can impose today. To the extent that this condition infringes on Ms. Grey's associational rights with her family, it is justified by the statutory sentencing factors. Let's move on.

THE COURT: Ms. Grey, it's now your time to speak if you'd like me to hear anything from you before I determine your sentence.

THE DEFENDANT: Thank you, Your Honor. I don't have much to say. I just want to ask for your mercy here. My family lives abroad and won't be able to visit me if I go to prison.

THE COURT: Thank you. Government?

MS. TORRES: Your Honor, I'll rest on my written submission to the court. Thank you.

THE COURT: Thank you. I will provide a few comments before I announce the sentence. First of all, we need to go through the mechanics of calculating the Guidelines range.

[DISCUSSION OF GUIDELINES CALCULATION OMITTED]

Does anyone disagree with my calculation of 10-16 months as the guidelines range?

MR. KAREV: No, Your Honor.

MS. TORRES: No, Your Honor.

THE COURT: Thank you. Ms. Grey, I've decided to impose a sentence of 12 months and one day. I'll explain why. I have considered all the factors required under 18 U.S.C. 3553(a), including the nature and circumstances of the offense, your history and characteristics, the need to promote deterrence, protection of the public, rehabilitation, and the need to avoid unwarranted sentencing disparities among other defendants. All those factors lead me to my sentence. First, I'm extremely troubled by your actions and consider this to be a serious offense. Yes, I'm aware that you never acted on your threats. At the same time, you caused a great deal of trauma to Dr. Yang. Second, I think deterrence is especially important in this case. I do not believe you've accepted responsibility for your actions or that you really understand why this crime is so offensive. I also think you have a serious lack of judgment when you engage with other people on the Internet.

Though you have not yet proven yourself to be a violent person, I think a one-year period of incarceration will ensure that your threatening behavior ceases and does not become more serious going forward.

Finally, this sentence is within the Guidelines range and is typical among those who are convicted of similar offenses.

For these reasons, the Court deems that the following sentence is sufficient but not greater than necessary to carry out the purposes of sentencing.

The defendant will be remanded to the custody of the Attorney General of the United States, the Bureau of Prisons, for a period of 12 months and one day.

After her period of incarceration ends, she will be on supervised release for three years. All mandatory conditions of supervised release will apply, which will be included in the judgment entry. Moreover, the special supervised release condition we discussed earlier will also apply. I'll read it here:

"The defendant shall not use the Internet as a means of expressive communication during her term of supervision, except 1) as necessary to obtain and maintain employment, which will require pre-approval by her probation officer, or 2) to transmit limited personal information, such as name, birthdate, address, phone number, email address, and credit card number, as necessary to make purchases, pay bills, book appointments, obtain identity documents, and request health or other personal records. But under no circumstances can she post, comment, make audio or video calls, or send messages on any social media or Internet messaging site, including but not limited to Instagram,

Facebook, WhatsApp, TikTok, Telegram, and Signal." I believe this condition is necessary to ensure that Ms. Grey does not re-offend. The Internet was clearly her tool to commit this offense in the first place, and I would like her to have a "digital detox," so to speak, while on supervised release so that she can have a healthy start as she re-enters society.

Finally, Ms. Grey, I want to take just a moment to advise you of your right of appeal. Anytime within 14 days from today, you have the right to appeal any action of this Court with which you disagree to the Sixth Circuit Court of Appeals. You're entitled to the services of an attorney to help you with this appeal. If you cannot afford an attorney, one will be appointed to represent you. Do you understand?

THE DEFENDANT: Yes, ma'am.

THE COURT: Is there anything else?

BOTH PARTIES: No, Your Honor.

THE COURT: Thank you. We are adjourned.

DEFENDANT: MEREDITH GREY
CASE NUMBER: CR 3-25-128

IMPRISONMENT

The defendant is hereby committed to the custody of the Federal Bureau of Prisons to be imprisoned for a total term of:

12 months and one day. The costs of incarceration are waived.

- The court makes the following recommendations to the Bureau of Prisons:
The defendant be designated to FCI Milan, Michigan

- The defendant is remanded to the custody of the United States Marshal.

- The defendant shall surrender to the United States Marshal for this district:
 - at _____ a.m. p.m. on _____ .
 - as notified by the United States Marshal.

- The defendant shall surrender for service of sentence at the institution designated by the Bureau of Prisons:
 - before 2 p.m. on _____ .
 - as notified by the United States Marshal.
 - as notified by the Probation or Pretrial Services Office.

RETURN

I have executed this judgment as follows:

Defendant delivered on _____ to _____
at _____, with a certified copy of this judgment.

UNITED STATES MARSHAL

By _____
DEPUTY UNITED STATES MARSHAL

DEFENDANT: MEREDITH GREY
CASE NUMBER: CR 3-25-128

SUPERVISED RELEASE

Upon release from imprisonment, you will be on supervised release for a term of:
Three years. The costs of supervision are waived.

MANDATORY CONDITIONS

1. You must not commit another federal, state or local crime.
2. You must not unlawfully possess a controlled substance.
3. You must refrain from any unlawful use of a controlled substance. You must submit to one drug test within 15 days of release from imprisonment and at least two periodic drug tests thereafter, as determined by the court.
 - The above drug testing condition is suspended, based on the court's determination that you pose a low risk of future substance abuse. *(check if applicable)*
4. You must make restitution in accordance with 18 U.S.C. §§ 3663 and 3663A or any other statute authorizing a sentence of restitution. *(check if applicable)*
5. You must cooperate in the collection of DNA as directed by the probation officer. *(check if applicable)*
6. You must comply with the requirements of the Sex Offender Registration and Notification Act (34 U.S.C. § 20901, *et seq.*) as directed by the probation officer, the Bureau of Prisons, or any state sex offender registration agency in the location where you reside, work, are a student, or were convicted of a qualifying offense. *(check if applicable)*
7. You must participate in an approved program for domestic violence. *(check if applicable)*

You must comply with the standard conditions that have been adopted by this court as well as with any other conditions on the attached page.

DEFENDANT: MEREDITH GREY
CASE NUMBER: CR 3-25-128

STANDARD CONDITIONS OF SUPERVISION

As part of your supervised release, you must comply with the following standard conditions of supervision. These conditions are imposed because they establish the basic expectations for your behavior while on supervision and identify the minimum tools needed by probation officers to keep informed, report to the court about, and bring about improvements in your conduct and condition.

1. You must report to the probation office in the federal judicial district where you are authorized to reside within 72 hours of your release from imprisonment, unless the probation officer instructs you to report to a different probation office or within a different time frame.
2. After initially reporting to the probation office, you will receive instructions from the court or the probation officer about how and when you must report to the probation officer, and you must report to the probation officer as instructed.
3. You must not knowingly leave the federal judicial district where you are authorized to reside without first getting permission from the court or the probation officer.
4. You must answer truthfully the questions asked by your probation officer.
5. You must live at a place approved by the probation officer. If you plan to change where you live or anything about your living arrangements (such as the people you live with), you must notify the probation officer at least 10 days before the change. If notifying the probation officer in advance is not possible due to unanticipated circumstances, you must notify the probation officer within 72 hours of becoming aware of a change or expected change.
6. You must allow the probation officer to visit you at any time at your home or elsewhere, and you must permit the probation officer to take any items prohibited by the conditions of your supervision that he or she observes in plain view.
7. You must work full time (at least 30 hours per week) at a lawful type of employment, unless the probation officer excuses you from doing so. If you do not have full-time employment you must try to find full-time employment, unless the probation officer excuses you from doing so. If you plan to change where you work or anything about your work (such as your position or your job responsibilities), you must notify the probation officer at least 10 days before the change. If notifying the probation officer at least 10 days in advance is not possible due to unanticipated circumstances, you must notify the probation officer within 72 hours of becoming aware of a change or expected change.
8. You must not communicate or interact with someone you know is engaged in criminal activity. If you know someone has been convicted of a felony, you must not knowingly communicate or interact with that person without first getting the permission of the probation officer.
9. If you are arrested or questioned by a law enforcement officer, you must notify the probation officer within 72 hours.
10. You must not own, possess, or have access to a firearm, ammunition, destructive device, or dangerous weapon (i.e., anything that was designed, or was modified for, the specific purpose of causing bodily injury or death to another person such as nunchakus or tasers).
11. You must not act or make any agreement with a law enforcement agency to act as a confidential human source or informant without first getting the permission of the court.
12. If the probation officer determines that you pose a risk to another person (including an organization), the probation officer may require you to notify the person about the risk and you must comply with that instruction. The probation officer may contact the person and confirm that you have notified the person about the risk.
13. You must follow the instructions of the probation officer related to the conditions of supervision.

U.S. Probation Office Use Only

A U.S. probation officer has instructed me on the conditions specified by the court and has provided me with a written copy of this judgment containing these conditions. For further information regarding these conditions, see *Overview of Probation and Supervised Release Conditions*, available at: www.uscourts.gov.

Defendant's Signature _____

Date _____

DEFENDANT: MEREDITH GREY
CASE NUMBER: CR 3-25-128

SPECIAL CONDITIONS OF SUPERVISION

The defendant shall not use the internet as a means of expressive communication during her term of supervision, except 1) as necessary to obtain and maintain employment, which will require pre-approval by her probation officer, or 2) to transmit limited personal information, such as name, birthdate, address, phone number, email address, and credit card number, as necessary to make purchases, pay bills, book appointments, obtain identity documents, and request health or other personal records. But under no circumstances can she post, comment, make audio or video calls, or send messages on any social media or internet messaging site, including but not limited to Instagram, Facebook, WhatsApp, TikTok, Telegram, and Signal.

DEFENDANT: MEREDITH GREY
 CASE NUMBER: CR 3-25-128

CRIMINAL MONETARY PENALTIES

The defendant must pay the total criminal monetary penalties under the schedule of payments on Sheet 6.

	<u>Assessment</u>	<u>Restitution</u>	<u>Fine</u>	<u>AVAA Assessment*</u>	<u>JVTA Assessment**</u>
TOTALS	\$ 100.00	\$ 0.00	\$ 5,000.00	\$ 0.00	\$ 0.00

The determination of restitution is deferred until _____. An Amended Judgment in a Criminal Case (AO 245C) will be entered after such determination.

The defendant must make restitution (including community restitution) to the following payees in the amount listed below.

If the defendant makes a partial payment, each payee shall receive an approximately proportioned payment, unless specified otherwise in the priority order or percentage payment column below. However, pursuant to 18 U.S.C. § 3664(i), all nonfederal victims must be paid before the United States is paid.

<u>Name of Payee</u>	<u>Total Loss***</u>	<u>Restitution Ordered</u>	<u>Priority or Percentage</u>
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TOTALS	\$ _____	0.00	\$ _____	0.00
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Restitution amount ordered pursuant to plea agreement \$ _____

The defendant must pay interest on restitution and a fine of more than \$2,500, unless the restitution or fine is paid in full before the fifteenth day after the date of the judgment, pursuant to 18 U.S.C. § 3612(f). All of the payment options on Sheet 6 may be subject to penalties for delinquency and default, pursuant to 18 U.S.C. § 3612(g).

The court determined that the defendant does not have the ability to pay interest and it is ordered that:

the interest requirement is waived for the fine restitution.

the interest requirement for the fine restitution is modified as follows:

* Amy, Vicky, and Andy Child Pornography Victim Assistance Act of 2018, Pub. L. No. 115-299.
 ** Justice for Victims of Trafficking Act of 2015, Pub. L. No. 114-22.
 *** Findings for the total amount of losses are required under Chapters 109A, 110, 110A, and 113A of Title 18 for offenses committed on or after September 13, 1994, but before April 23, 1996.

DEFENDANT: MEREDITH GREY
CASE NUMBER: CR 3-25-128

SCHEDULE OF PAYMENTS

Having assessed the defendant's ability to pay, payment of the total criminal monetary penalties is due as follows:

- A** Lump sum payment of \$ 100.00 due immediately, balance due
- not later than _____, or
- in accordance with C, D, E, or F below; or
- B** Payment to begin immediately (may be combined with C, D, or F below); or
- C** Payment in equal _____ (e.g., weekly, monthly, quarterly) installments of \$ _____ over a period of _____ (e.g., months or years), to commence _____ (e.g., 30 or 60 days) after the date of this judgment; or
- D** Payment in equal _____ (e.g., weekly, monthly, quarterly) installments of \$ _____ over a period of _____ (e.g., months or years), to commence _____ (e.g., 30 or 60 days) after release from imprisonment to a term of supervision; or
- E** Payment during the term of supervised release will commence within _____ (e.g., 30 or 60 days) after release from imprisonment. The court will set the payment plan based on an assessment of the defendant's ability to pay at that time; or
- F** Special instructions regarding the payment of criminal monetary penalties:

Unless the court has expressly ordered otherwise, if this judgment imposes imprisonment, payment of criminal monetary penalties is due during the period of imprisonment. All criminal monetary penalties, except those payments made through the Federal Bureau of Prisons' Inmate Financial Responsibility Program, are made to the clerk of the court.

The defendant shall receive credit for all payments previously made toward any criminal monetary penalties imposed.

- Joint and Several

Case Number Defendant and Co-Defendant Names (including defendant number)	Total Amount	Joint and Several Amount	Corresponding Payee, if appropriate
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- The defendant shall pay the cost of prosecution.
- The defendant shall pay the following court cost(s):
- The defendant shall forfeit the defendant's interest in the following property to the United States:

Payments shall be applied in the following order: (1) assessment, (2) restitution principal, (3) restitution interest, (4) AVAA assessment, (5) fine principal, (6) fine interest, (7) community restitution, (8) JVT A assessment, (9) penalties, and (10) costs, including cost of prosecution and court costs.

DEFENDANT: MEREDITH GREY
CASE NUMBER: CR 3-25-128
DISTRICT: Eastern District of Michigan

STATEMENT OF REASONS

VII. COURT DETERMINATIONS OF RESTITUTION

A. **Restitution Not Applicable.**

B. **Total Amount of Restitution:** \$ _____

C. **Restitution not ordered:** *(Check only one)*

1. For offenses for which restitution is otherwise mandatory under 18 U.S.C. § 3663A, restitution is not ordered because the number of identifiable victims is so large as to make restitution impracticable under 18 U.S.C. § 3663A(c)(3)(A).
2. For offenses for which restitution is otherwise mandatory under 18 U.S.C. § 3663A, restitution is not ordered because determining complex issues of fact and relating them to the cause or amount of the victims' losses would complicate or prolong the sentencing process to a degree that the need to provide restitution to any victim would be outweighed by the burden on the sentencing process under 18 U.S.C. § 3663A(c)(3)(B).
3. For other offenses for which restitution is authorized under 18 U.S.C. § 3663 and/or required by the sentencing guidelines, restitution is not ordered because the complication and prolongation of the sentencing process resulting from the fashioning of a restitution order outweigh the need to provide restitution to any victims under 18 U.S.C. § 3663(a)(1)(B)(ii).
4. For offenses for which restitution is otherwise mandatory under 18 U.S.C. §§ 1593, 2248, 2259, 2264, 2327 or 3663A, restitution is not ordered because the victim(s)'(s) losses were not ascertainable (18 U.S.C. § 3664(d)(5)).
5. For offenses for which restitution is otherwise mandatory under 18 U.S.C. §§ 1593, 2248, 2259, 2264, 2327 or 3663A, restitution is not ordered because the victim(s) elected to not participate in any phase of determining the restitution order (18 U.S.C. § 3664(g)(1)).
6. Restitution is not ordered for other reasons. *(Explain)*

D. **Partial restitution is ordered for these reasons (18 U.S.C. § 3553(c)):**

VIII. ADDITIONAL BASIS FOR THE SENTENCE IN THIS CASE *(If applicable)*

Defendant's Soc. Sec. No.: _____

Date of Imposition of Judgment _____

Defendant's Date of Birth: _____

Defendant's Residence Address: _____

Signature of Judge _____

Defendant's Mailing Address: _____

Name and Title of Judge _____

Date Signed _____

NOTICE OF APPEAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

-v.-

MEREDITH GREY,

Defendant.

----CR 3-25-128----

NOTICE OF APPEAL

Notice is hereby given that MEREDITH GREY hereby appeals her conviction of violating 18 U.S.C. § 875(c), entered on June 20, 2025, and the sentencing order entered July 29, 2025, to the United States Court of Appeals for the Sixth Circuit.

Dated: August 12, 2025

Respectfully Submitted,

/s/ Alex Karev

Alex Karev
Federal Community Defenders,
Eastern District of Michigan
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Detroit, MI 48226
Phone: (313) 967-5542