UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

:

v. : Case No. 1:21-cr-00738-BAH

:

MICHAEL OLIVERAS, :

•

Defendant. :

NOTICE OF FILING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby notifies the Court of the submission of video exhibits in support of its Motion in Limine to Preclude Arguments and Evidence About Alleged Law Enforcement Permissiveness in the above-captioned matter. *See* ECF 28. Video exhibits have been submitted to the Court and made available to defense counsel via the government's file-sharing site, USAfx. Video exhibits will also be made available to the public consistent with Standing Order 21-28 issued by the Chief Judge on May 14, 2021 upon order of the Court. Each exhibit is briefly identified and described below:

- Exhibit 1: Video recorded and narrated by Defendant while he is outside the Senate Wing Door with other rioters who attempt to force themselves into the Capitol and past the police. (Video length: 19 seconds.)
- Exhibit 2: Video recorded and narrated by Defendant while he is outside the Senate Wing Door with rioters who attempt to force themselves into the Capitol and past the police. The police are visible in this video inside of the Capitol as Defendant yells, "We want those fucking traitors" and "Push!" (Video length: 21 seconds)

.

Respectfully submitted,

MATTHEW M. GRAVES UNITED STATES ATTORNEY D.C. Bar Number 481052

By: /s/ Anthony L. Franks

ANTHONY L. FRANKS Assistant United States Attorney Bar No. 50217MO 555 Fourth Street, N.W., Room Washington, DC 20530 anthony.franks@usdoj.gov (314) 539-3995

/s/ Victoria A. Sheets

VICTORIA A. SHEETS NY Bar No. 5548623 Assistant United States Attorney U.S. Department of Justice 601 D Street NW Washington, DC 20530 (202) 809-2050 Victoria.Sheets@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2022, I caused a copy of the foregoing motion to be served on counsel of record via electronic filing.

/s/ Anthony L. Franks
Anthony L. Franks

Assistant United States Attorney