



Comes now Defendant Jacob Chansley, through his counsel of record William L. Shipley, and provides this Court with additional information and one correction with respect to his Motion to Vacate, Set Aside, or Correct His Sentence filed on April 27, 2023.

At Page 12, in the last paragraph at the bottom of the page, the reference to “October 21, 2021” should be “October **22**, 2021” with regard to the date the Government claims is produced the CCTV video in Global Discovery Vol. 5.

The Discovery Status Memorandum filed by the Government on October 25, 2021, ECF No. 78, purported to provide information related to the production of discovery through October 21, 2021. In Doc. 78 the Government stated CCTV video from inside the Capitol would be the subject of “future productions.”

Reading the documents literally, the Government reported to the Court and Counsel on October 25, 2021, the status of discovery only through October 21, 2021. The claimed production of the CCTV video from the “interior” of the Capitol – videos capturing Mr. Chansley – would have been in the “future” if that production did take place on October 22, 2021, as claimed by the Government in the March 27, 2023, correspondence to counsel for Mr. Chansley.

In addition, a Discovery Status Memorandum filed by the Government on November 5, 2021, ECF No. 79, does state 4,204 video files consisting of U.S. Capitol Police Closed Circuit video from 123 cameras was produced since the date of the October 25, 2021, Discovery Status Memorandum. This November 5 Status Memorandum was not referenced in the Defendant’s Motion, but the

dates are relevant to the issues presented. The description of 4204 files matches the reference by the Government in its October 25, 2021, Memorandum of CCTV video files from the interior of the Capitol that would be the subject of future productions.

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Respectfully submitted,

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