

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

UNITED STATES OF AMERICA :
 :
 v. : **CASE NO. 21 Mag. 499**
 : **21 Cr. 447**
MICHAEL STEVEN PERKINS :

GOVERNMENT’S NOTICE OF FILING OF EXHIBITS
PURUSANT TO LOCAL CRIMINAL RULE 49

The United States of America, through the undersigned, hereby gives this notice pursuant to Local Criminal Rule 49, of the following exhibits that were provided to the Court and defense counsel on July 6, 2021 (defense counsel) and July 7, 2021 (the Court) via USAfx, in relation the Government’s Memorandum in Support of Pretrial Detention (ECF No. 10). These exhibits will be offered into evidence during the detention hearing scheduled for July 8, 2021. Because several exhibits are video clips, they are not in a format that readily permits electronic filing on CM/ECF.

The proposed exhibits are as follows:

1. Government Exhibit 1 is a still image from the body-worn camera video of an officer with the Metropolitan Police Department. The events depicted in in the exhibit occurred at approximately 1:57:26 on January 6, 2021.
2. Government Exhibit 2 is a still image from the body-worn camera video of an officer with the Metropolitan Police Department. The events depicted in in the exhibit occurred at approximately 2:04:10 on January 6, 2021.
3. Government Exhibit 3 is a still image from the body-worn camera video of an officer with the Metropolitan Police Department. The events depicted in in the exhibit occurred at approximately 2:04:15 on January 6, 2021.

4. Government Exhibit 4 is a clip from the body-worn camera video of an officer with the Metropolitan Police Department. The clip is approximately 25 seconds long. The events depicted in the exhibit occurred at approximately 2:04 p.m. EST on January 6, 2021.

5. Government Exhibit 4A is a still image from Government Exhibit 4 -- the body-worn camera video of an officer with the Metropolitan Police Department. The events depicted in the exhibit occurred at approximately 2:04:35 p.m. EST on January 6, 2021.

6. Government Exhibit 4B is a still image from Government Exhibit 4 -- the body-worn camera video of an officer with the Metropolitan Police Department. The events depicted in the exhibit occurred at approximately 2:04:45 p.m. EST on January 6, 2021.

7. Government Exhibit 4C is a still image from Government Exhibit 4 -- the body-worn camera video of an officer with the Metropolitan Police Department. The events depicted in the exhibit occurred at approximately 2:04:45 p.m. EST on January 6, 2021.

8. Government Exhibit 5 is a still image from the body-worn camera video of an officer with the Metropolitan Police Department. The events depicted in in the exhibit occurred at approximately 2:04:45 on January 6, 2021.

9. Government Exhibit 6 is a still image from the body-worn camera video of an officer with the Metropolitan Police Department. The events depicted in in the exhibit occurred at approximately 2:04:45 on January 6, 2021.

10. Government Exhibit 7 is a still image from the body-worn camera video of an officer with the Metropolitan Police Department. The events depicted in in the exhibit occurred at approximately 2:04:46 on January 6, 2021.

11. Government Exhibit 8 is a clip from the body-worn camera video of an officer with the Metropolitan Police Department. The clip is approximately 9 seconds long. The events depicted in the exhibit occurred at approximately 2:04 p.m. EST on January 6, 2021.

12. Government Exhibit 8A is a still image from Government Exhibit 8 -- the body-worn camera video of an officer with the Metropolitan Police Department. The events depicted in the exhibit occurred at approximately 2:04:47 p.m. EST on January 6, 2021.

13. Government Exhibit 9 is a still image from the body-worn camera video of an officer with the Metropolitan Police Department. The events depicted in in the exhibit occurred at approximately 2:57:56 p.m. on January 6, 2021.

If the Court accepts these proposed exhibits into evidence on July 8, 2021, the United States takes the position that the entered exhibits should be promptly released to the public.

Respectfully submitted,

CHANNING D. PHILLIPS
Acting United States Attorney

/s/ Benet J. Kearney _____

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