

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 1:21-CR-00195-CKK
	:	
Deborah Sandoval,	:	
	:	
Defendant.	:	

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 and table (*See*, Attachment A) that were provided to the Court and defense counsel on April 25, 2023 (via USB drive for the Court and USAfx for defense counsel) in relation to government’s sentencing memorandum (ECF No. 122). These exhibits will be offered into evidence during the sentencing hearing scheduled for May 1, 2023. Because the 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 CCTV footage from the Senate Wing Doors and the Crypt on January 6, 2021.
2. Government Exhibit 2 is a video clip taken by another rioter at the Senate Wing Doors on January 6, 2021.
3. Government Exhibit 3 is a video recorded by Deborah Sandoval on January 6, 2021.

If the Court accepts these proposed exhibits into evidence on May 1, 2023, the United States takes the position that the entered exhibits should be promptly released to the public.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

By: /s/ Holly Grosshans
HOLLY F. GROSSHANS
Assistant United States Attorney
D.C. Bar No. 90000361
U.S. Attorney's Office for the District of
Columbia
601 D Street, N.W.
Washington, D.C. 20530
Phone: (202) 252-6737
Email: Holly.Grosshans@usdoj.gov

Brian Brady
Trial Attorney, Department of Justice
DC Bar No. 1674360
1301 New York Ave. N.W., Suite 800
Washington, DC 20005
(202) 834-1916
Brian.Brady@usdoj.gov