

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)	
)	
)	Case No. 21-cr-204-3
v.)	Chief Judge Howell
)	
)	
BLAKE AUSTIN REED.)	

DEFENDANT’S POSITION REGARDING PUBLIC RELEASE OF EVIDENCE

Per the Court’s January 10, 2022 minute order, the Defendant, Blake Austin Reed, hereby states that he has no objection to the following video and/or photographic evidence being made publicly available:

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
1	20210106_115740.mp4	Defense	00:53	Rally grounds
2	20210106_120016.mp4	Defense	07:55	
3	20210106_120812.mp4	Defense	02:05	
4	20210106_121301.jpg	Defense	N/A – photo	
5	10105642416424440.PNG	Photos from Facebook Screenshots ¹	N/A – photo	
6	10105642427142960.PNG	Photos from Facebook Screenshots	N/A – photo	
7	10105642427397450.PNG	Photos from Facebook Screenshots	N/A – photo	
8	10105642427497250.PNG	Photos from Facebook Screenshots	N/A – photo	
9	10105642679477280.PNG	Photos from Facebook Screenshots	N/A – photo	
10	10105642682276670.PNG	Photos from	N/A – photo	

	NG	Facebook Screenshots		
11	10105642683494230.PNG	Photos from Facebook Screenshots	N/A – photo	
12	10105642683658900.PNG	Photos from Facebook Screenshots	N/A – photo	
13	10105642687311580.PNG	Photos from Facebook Screenshots	N/A – photo	
14	10105642687371460.PNG	Photos from Facebook Screenshots	N/A – photo	
15	3451054651672146.PNG	Photos from Facebook Screenshots	N/A – photo	
16	1872055052960855.PNG	Photos from Facebook Screenshots	N/A – photo	
17	734037053881609.PNG	Photos from Facebook Screenshots	N/A – photo	
18	415756726433008.PNG	Photos from Facebook Screenshots	N/A – photo	
19	388337385596597.PNG	Photos from Facebook Screenshots	N/A – photo	
20	216848656713436.PNG	Photos from Facebook Screenshots	N/A – photo	
21	20210106_125523.mp4	Defense	00:13	
22	20210106_130628.jpg	Defense	N/A – photo	Path from rally to riot – Constitution Avenue and Pennsylvania Avenue, N.W.
23	20210106_130631.jpg	Defense	N/A – photo	
24	20210106_130637.jpg	Defense	N/A – photo	
25	20210106_130931.mp4	Defense	00:31	
26	20210106_131017.jpg	Defense	N/A – photo	
27	20210106_131021.jpg	Defense	N/A – photo	
28	20210106_131022.jpg	Defense	N/A – photo	
29	20210106_131359.jpg	Defense	N/A – photo	
30	20210106_131628.jpg	Defense	N/A – photo	
31	20210106_131634.jpg	Defense	N/A – photo	

32	20210106_131941.jpg	Defense	N/A – photo	
33	20210106_131943.jpg	Defense	N/A – photo	
34	20210106_131951.jpg	Defense	N/A – photo	
35	20210106_132351.jpg	Defense	N/A – photo	
36	20210106_132521.jpg	Defense	N/A – photo	
37	20210106_132525.jpg	Defense	N/A – photo	
38	20210106_132653.jpg	Defense	N/A – photo	
39	20210106_132856.jpg	Defense	N/A – photo	
40	20210106_132935.jpg	Defense	N/A – photo	
41	20210106_133643.jpg	Defense	N/A – photo	
42	432380711294015.PNG	Photos from Facebook Screenshots	N/A – photo	
43	20210106_133734.mp4	Defense	00:52	Peace Circle
44	20210106_134641.mp4	Defense	00:15	NW courtyard – north of the scaffolding
45	20210106_134746.mp4	Defense	01:11	
46	20210106_134959.mp4	Defense	01:11	
47	20210106_135202.mp4	Defense	01:55	
48	20210106_135446.jpg	Defense	N/A – photo	
49	20210106_135450.mp4	Defense	00:59	
50	1832238743614195.jpg	Photos from Facebook Screenshots	N/A – photo	
51	0928_USCG_00_Upper_Terrace_NW_-_2021-01-06_18h49min22s	Capitol Police	10:12	
52	0928_USCG_00_Upper_Terrace_NW_-_2021-01-06_18h59min37s	Capitol Police	10:07	
53	(Clip_1.1)_0928_USCG_00_Upper_Terrace_NW_-_2021-01-06_19h09min45s	Capitol Police	1:01	
54	20210106_135949.jpg	Defense	N/A – photo	
55	224088472655432.PNG	Photos from Facebook Screenshots	N/A – photo	
56	(Clip_1.1)_0927_USCG_00_Upper_Terrace_NW_-_2021-01-06_18h46min19s	Capitol Police	12:47	
57	(Clip_1.1)_0927_USCG_00_Upper_Terrace_N	Capitol Police	09:09	

	W_-_2021-01-06_19h01min49s			
58	(Clip_1.1)_20210106_-_FELONY_RIOT_-_US_CAPITOL	M.P.D. Body Worn Camera ²	02:48	
59	(Clip_1.1)_20210106_-_FELONY_RIOTS_-_US_CAPITAL_BUILDING	M.P.D. Body Worn Camera	04:28	
60	(Clip_1.1)_20210106-Felony_Riots-First_St_SE	M.P.D. Body Worn Camera	04:30	
61	(Clip_1.1)_20210106-FELONY_RIOTING-FIRST_ST_SE	M.P.D. Body Worn Camera	00:38	
62	(Clip_1.1)_20210106-FELONY_RIOT-US_CAPITOL_BUILDING	M.P.D. Body Worn Camera	04:34	
63	(Clip_1.1)_20210106-FELONYRIOT-FIRSTSTSE	M.P.D. Body Worn Camera	02:08	
64	(Clip_1.1)_20210106-FELONYRIOT-FIRSTSTSE-2	M.P.D. Body Worn Camera	04:01	
65	(Clip_1.1)_20210106-FELONYRIOT-US_CAPITOL_NW	M.P.D. Body Worn Camera	00:31	
66	(Clip_1.1)_20210107-FIRST_AMENDMENT-US_CAPTIAL	M.P.D. Body Worn Camera	04:50	
67	(Clip_2.1)_20210106_-_FIRST_AMENDMENT_-_US_CAPITOL	M.P.D. Body Worn Camera	01:08	
68	(Clip_2.1)_20210106-FELONYRIOT-FIRSTSTSE	M.P.D. Body Worn Camera	04:38	
69	(Clip_2.1)_20210106-US_Capitol-APO	M.P.D. Body Worn Camera	4:25	

70	(Clip 1.1) 20210106 - FIRST AMENDMENT ASSEMBLY- WASHINGTON DC	M.P.D. Body Worn Camera	04:27
71	(Clip_3.1)_20210106_- _FELONY_RITOING_- _FIRST ST SE	M.P.D. Body Worn Camera	04:30
72	(Clip_3.1)_20210106_- _First_Amendment_- _US_Capitol	M.P.D. Body Worn Camera	04:48
73	20210106_135953.mp4	Defense	00:35
74	20210106_140204.mp4	Defense	03:36
75	20210106_140848.jpg	Defense	N/A – photo
76	864771470937657.PNG	Photos from Facebook Screenshots	N/A – photo
77	20210106_140858.jpg	Defense	N/A – photo
78	157191779533028.PNG	Photos from Facebook Screenshots	N/A – photo
79	20210106_140901.jpg	Defense	N/A – photo
80	521016585483236.PNG	Photos from Facebook Screenshots	N/A – photo
81	20210106_140917.mp4	Defense	02:16
82	S.C.N.R.	Open Source https://youtu.be/xmF7qQdfcrQ	Total – 17:29 Relevant Portion – 11:10-11:17
83	20210106_141150.mp4	Defense	00:01
84	20210106_141157.jpg	Defense	N/A – photo
85	20210106_141202.jpg	Defense	N/A – photo
86	681383332536701.PNG	Photos from Facebook Screenshots	N/A – photo
87	20210106_141204.jpg	Defense	N/A – photo
88	312939420106041.PNG	Photos from Facebook Screenshots	N/A – photo
89	20210106_141209.jpg	Defense	N/A – photo
90	205926851193977.PNG	Photos from Facebook Screenshots	N/A – photo
91	1344677735881871.PN	Photos from	N/A – photo

	G	Facebook Screenshots		
92	20210106_141335.jpg	Defense	N/A – photo	
93	428219225272649.PNG	Photos from Facebook Screenshots	N/A – photo	
94	0609_USCG_00_West_Front_North_-_2021-01-06_19h09min25s	Capitol Police	8:56	
95	20210106_141546.mp4	Defense	00:23	NW balustrade and stairs
96	20210106_141810.mp4	Defense	00:15	
97	(Clip_1.1)_0924_USCG_00_ST22_Exterior_-_2021-01-06_19h16min11s	Capitol Police	02:04	
98	(Clip_1.1)_0925_USCG_00_Upper_Terrace_West_-_2021-01-06_19h00min00s	Capitol Police	00:25	
99	0106211419.mp4	Another investigation	Total – 00:36 Relevant Portion – 00:04-00:07	
100	20210106_142115.mp4	Defense	00:54	Upper Terrace West
101	20210106_142341.mp4	Defense	00:18	
102	20210106_142433.jpg	Defense	N/A – photo	
103	405121167212263.PNG	Photos from Facebook Screenshots	N/A – photo	
104	20210106_142436.jpg	Defense	N/A – photo	
105	396061431684406.PNG	Photos from Facebook Screenshots	N/A – photo	
106	20210106_142438.jpg	Defense	N/A – photo	
107	233404451709072.PNG	Photos from Facebook Screenshots	N/A – photo	
108	1944061822413304.PNG	150	N/A – photo	
109	20210106_142440.jpg	Defense	N/A – photo	
110	871925626933285.PNG	Photos from Facebook Screenshots	N/A – photo	
111	20210106_142442.jpg	Defense	N/A – photo	

112	20210106_142447.jpg	Defense	N/A – photo	
113	399491848165987.PNG	Photos from Facebook Screenshots	N/A – photo	
114	(Clip_1.1)_0926_USCG_00_Upper_Terrace_We st_-_2021-01-06_19h20min01s	Capitol Police	05:02	
115	(Clip_2.1)_0102USCS01SenateWingDoornearS139_2021-01-06_14h20min18s087ms	Capitol Police	01:08	
116	20210106_142541.mp4	Defense	00:25	Corridor between the Senate Wing Door and the Crypt
117	20210106_142616.jpg	Defense	N/A – photo	
118	3736114959781726.PNG	Photos from Facebook Screenshots	N/A – photo	
119	20210106_142623.jpg	Defense	N/A – photo	
120	3065941810299707.PNG	Photos from Facebook Screenshots	N/A – photo	
121	(Clip_1.1)_0402USCH01CryptNorth_2021-01-06_14h17min43s317ms	Capitol Police	2:58	Crypt
122	(Clip_1.1)_0402USCH01CryptNorth_2021-01-06_14h29min17s867ms	Capitol Police	2:44	
123	20210106_142643.jpg	Defense	N/A – photo	
124	1230695713991194.PNG	Photos from Facebook Screenshots	N/A – photo	
125	20210106_142647.mp4	Defense	01:12	
126	aa3a383cfd1dale7068cd856e071eac.mp4	Another investigation	Total – 08:16 Relevant Portion – 4:57-5:00	
127	(Clip_1.1)_0178_USCH_01_Crypt_East_-_2021-01-06_19h20min01s	Capitol Police	5:35	
128	(Clip_1.1)_0403USCH01CryptSouth_2021-01-06_14h24min01s510ms	Capitol Police	6:39	
129	(Clip_1.1)_7206_USCS	Capitol Police	5:19	

	_01_Crypt_Lobby_East_- _2021-01-06_19h19min01s			
130	(Clip_1.1)_0171_USCH_01_Memorial_Door_- _2021-01-06_19h31min24s	Capitol Police	2:39	Memorial Door
131	20210106_143311.mp4	Defense	00:42	
132	(Clip_2.1)_0959_USC_02_Rotunda_South_- _2021-01-06_19h34min32s	Capitol Police	00:53	Rotunda
133	(Clip_2.1)_0959_USC_02_Rotunda_South_- _2021-01-06_19h34min32s	Capitol Police	00:53	
134	(Clip_1.1)_0960USC02_RotundaNorth_2021-01-06_14h20min01s463ms	Capitol Police	4:49	
135	(Clip_1.1)_0218USCD02CapitolRotunda_2021-01-06_14h20min00s970ms	Capitol Police	1:29	
136	20210106_143439.mp4	Defense	00:36	
137	(Clip_2.1)_0262_USCH_02_Statuary_Hall_- _2021-01-06_19h29min47s	Capitol Police	00:24	Statuary Hall
138	(Clip_1.1)_0966_USC_02_Statuary_Hall_East_- _2021-01-06_19h27min47s	Capitol Police	00:53	
139	(Clip_1.1)_0964_USCH_02_Statuary_Hall_West_- _2021-01-06_19h31min36s	Capitol Police	00:24	
140	Cell video.mov	Another Investigation	Total – 01:56 Relevant Portion – 00:16-00:45	
141	(Clip_1.1)_0259_USCH_02_Statuary_Hall_Connector_- _2021-01-06_19h20min01s	Capitol Police	01:01	Statuary Hall Connector

142	(Clip_1.1)_0259_USCH_02_Statuary_Hall_Connector_-_2021-01-06_19h37min42s	Capitol Police	05:01	
143	20210106_143839.mp4	Defense	00:11	
144	9d7de52208ae7577d9e67f47ea88ab40.mp4	Another Investigation	Total – 07:25 Relevant Portion – 6:32-6:53	
145	MB 3.jpg	Photos From Tips	N/A – photo	
146	0251 Clip	Capitol Police	1:34	Hallway north of the House Chamber
147	20210106_144322.mp4	Defense	00:34	Hallway north of the House Chamber; East Stairway, House Wing
148	(Clip_1.1)_0250_USCH_02_East_Stairs_near_H208_-_2021-01-06_19h26min25s	Capitol Police	00:59	Facing the East Stairway, House Wing
149	20210106_144414.jpg	Defense	N/A – photo	East Stairway, House Wing
150	(Clip_1.1)_0264_USCH_02_Upper_House_Door_Interior_-_2021-01-06_19h36min17s	Capitol Police	04:07	Hallway between the Upper House Door and the Hallway to the East of the House Chamber
151	(Clip_1.1)_0264_USCH_02_Upper_House_Door_Interior_-_2021-01-06_19h48min16s	Capitol Police	00:55	
152	ebe11b28fc0dfd2b4119776c9818cfef.mp4	Another Investigation	Total – 06:24 Relevant Portion – 2:37-3:30	Hallway to the East of the House Chamber
153	(Clip_1.1)_0267_USCH_02_Upper_House_Door_Interior_-_2021-01-06_19h45min20s	Capitol Police	00:17	Upper House Door
154	(Clip_1.1)_0266_USCG_00_East_Front_House_Door_-_2021-01-06_19h46min37s	Capitol Police	00:20	

155	Benjamin Reports January 6 DC RAW Video Capitol building footage, clashes with police	Open Source https://youtu.be/ DHessyWYXq M	Total – 31:03 Relevant portion – 27:57-28:23	Hallway between the Upper House Door and the Hallway to the East of the House Chamber
156	NEMOS NEWS NETWORK		Total – 07:38 Relevant portion – 1:26-1:30	Upper House Door
157	20210106_145149.mp4	Defense	00:27	Balcony outside the Upper House Door
158	20210106_145421.mp4	Another Investigation	Total – 04:45 Relevant Portion – 2:45-3:13	
159	20210106_145715.mp4	Defense	01:07	
160	20210106_145141.jpg	Defense	N/A – photo	Stairs by the Upper House Door
161	20210106_150205.jpg	Defense	N/A – photo	East grounds near the East Rotunda Doors
162	224635179268420.PNG	Photos from Facebook Screenshots	N/A – photo	
163	20210106_150210.jpg	Defense	N/A – photo	East grounds near the East Rotunda Doors facing towards the Senate Wing
164	432237554594150.PNG	Photos from Facebook Screenshots	N/A – photo	
165	20210106_150342.jpg	Defense	N/A – photo	
166	2791217987801360.PNG	Photos from Facebook Screenshots	N/A – photo	East grounds near the Senate Carriage Door
167	20210106_150353.jpg	Defense	N/A – photo	
168	466128691183616.PNG	Photos from Facebook Screenshots	N/A – photo	
169	20210106_150544.jpg	Defense	N/A – photo	
170	502613034474148.PNG	Photos from Facebook Screenshots	N/A – photo	Upper Terrace West
171	20210106_150549.jpg	Defense	N/A – photo	
172	1519272251592671.PNG	Photos from Facebook Screenshots	N/A – photo	

173	20210106_150645.jpg	Defense	N/A – photo	
174	2855498214768094.PNG	Photos from Facebook Screenshots	N/A – photo	
175	20210106_150649.jpg	Defense	N/A – photo	
176	2794348980835359.PNG	Photos from Facebook Screenshots	N/A – photo	
177	20210106_150650.jpg	Defense	N/A – photo	
178	20210106_150649(0).jpg	Defense	N/A – photo	
179	20210106_150654.jpg	Defense	N/A – photo	
180	20210106_150655.jpg	Defense	N/A – photo	
181	693651047965669.PNG	Photos From Facebook Screenshots	N/A – photo	
182	20210106_150700.jpg	Defense	N/A – photo	
183	464071127926334.PNG	Photos From Facebook Screenshots	N/A – photo	
184	20210106_150702.jpg	Defense	N/A – photo	
185	20210106_150703.jpg	Defense	N/A – photo	
186	20210106_150705.jpg	Defense	N/A – photo	
187	20210106_150715.jpg	Defense	N/A – photo	
188	20210106_150726.jpg	Defense	N/A – photo	
189	20210106_150728.jpg	Defense	N/A – photo	
190	10105643244614740.PNG	Photos From Facebook Screenshots	N/A – photo	
191	20210106_150831.jpg	Defense	N/A – photo	
192	20210106_150833.jpg	Defense	N/A – photo	
193	20210106_151236.jpg	Defense	N/A – photo	North lawn
194	20210106_151237.jpg	Defense	N/A – photo	
195	20210106_151240.jpg	Defense	N/A – photo	
196	20210106_151246.jpg	Defense	N/A – photo	Northwest lawn
197	20210106_151618.jpg	Defense	N/A – photo	
198	20210106_151622.jpg	Defense	N/A – photo	
199	271283254334643.PNG	Photos From Facebook Screenshots	N/A – photo	Facing the west front of the Capitol
200	1823199781182686.PNG	Photos From Facebook Screenshots	N/A – photo	Near the Capitol Reflecting Pool

201	MB 6.JPG	Photos From Tips	N/A – photo	Assorted locations on west side of Capitol
202	Resized_20210117_073740.jpg	Photo of Door	N/A – photo	Reed’s home
203	168779671655691.PNG	Photos from Facebook Screenshots	N/A – photo	N/A

Respectfully submitted,

Bulloch Fly Hornsby & Evans, PLLC

/s/ Luke A. Evans

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Certificate of Service

I hereby certify that on January 10, 2022, I electronically filed the foregoing Pleading with the clerk of the court by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: **Jamie Carter and Mitra Jafary-Hariri**, Assistant United States Attorneys 555 4th Street, NW, Washington, D.C. 20530.

/s/ Luke A. Evans

LUKE A. EVANS