

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

**UNITED STATES OF AMERICA**

v.

**SEAN MICHAEL MCHUGH,**

**Defendant.**

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**Case No. 1:21-mj-00436  
Chief Judge Beryl A. Howell**

**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 June 21, 2021 via USAfx, in relation to Defendant’s Motion to Review Magistrate Judge's Detention Decision (ECF No. 15), Government’s Response in Opposition to Defendant’s Motion to Review Magistrate Judge’s Detention Decision (ECF No. 16), and Defendant’s Reply to Opposition (ECF No. 17). These exhibits will be offered into evidence during the evidentiary hearing scheduled for June 25, 2021. 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 clip from an open source video downloaded from the YouTube channel “Cop Watch”. The clip is approximately 57 seconds. The events depicted in in the exhibit occurred in the early afternoon of January 6, 2021.

2. Government Exhibit 2 is a clip from the body-worn camera of an officer with the Metropolitan Police Department. The clip is approximately 13 seconds. The events depicted in the exhibit occurred at approximately 1:14 p.m. EST on January 6, 2021.

3. Government Exhibit 3 is a clip from the body-worn camera of an officer with the Metropolitan Police Department. The clip is approximately 15 seconds. The events depicted in the exhibit occurred at approximately 1:16 p.m. EST on January 6, 2021.

4. Government Exhibit 4 is a clip from the body-worn camera of an officer with the Metropolitan Police Department. The clip is approximately 19 seconds. The events depicted in the exhibit occurred at approximately 1:31 p.m. EST on January 6, 2021.

5. Government Exhibit 5 is a clip from the body-worn camera of an officer with the Metropolitan Police Department. The clip is approximately 27 seconds. The events depicted in the exhibit occurred at approximately 1:32 p.m. EST on January 6, 2021.

6. Government Exhibit 6 is a clip from the body-worn camera of an officer with the Metropolitan Police Department. The clip is approximately 78 seconds. The events depicted in the exhibit occurred at approximately 1:34 p.m. EST on January 6, 2021.

7. Government Exhibit 7 is a clip from the body-worn camera of an officer with the Metropolitan Police Department. The clip is approximately 20 seconds. The events depicted in the exhibit occurred at approximately 1:35 p.m. EST on January 6, 2021.

8. Government Exhibit 8 is a clip from the body-worn camera of an officer with the Metropolitan Police Department. The clip is approximately 18 seconds. The events depicted in the exhibit occurred at approximately 1:37 p.m. EST on January 6, 2021.

9. Government Exhibit 9 is a clip from the body-worn camera of an officer with the Metropolitan Police Department. The clip is approximately 27 seconds. The events depicted in the exhibit occurred at approximately 1:39 p.m. EST on January 6, 2021.

10. Government Exhibit 10 is a clip from the body-worn camera of an officer with the Metropolitan Police Department. The clip is approximately 14 seconds. The events depicted in the exhibit occurred at approximately 1:40 p.m. EST on January 6, 2021.

11. Government Exhibit 11 is a clip from an open source video downloaded from the YouTube channel “Benjamin Reports”. The clip is approximately 18 seconds. The events depicted in in the exhibit occurred in the early afternoon of January 6, 2021

12. Government Exhibit 12 is a clip from video recorded by law enforcement officers capturing the riot at the lower west terrace of the U.S. Capitol. The clip is approximately 9 seconds. The events depicted in in the exhibit occurred in the afternoon of January 6, 2021.

If the Court accepts these proposed exhibits into evidence on June 25, 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  
D.C. Bar No. 415793

/s/ JACOB J. STRAIN  
JACOB J. STRAIN  
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