

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

UNITED STATES OF AMERICA :
 :
 v. : **Case No.: 1:21-CR-240-BAH**
 :
LAWRENCE EARL STACKHOUSE, :
Defendant. :

NOTICE OF FILING OF ITEMS INCOMPATIBLE WITH CM/ECF FILING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, in accordance with Local Rule 49(e)(1), hereby files this notice of filing of the following exhibits that are incompatible with CM/ECF filing pursuant to the Court's February 1, 2022 Minute Order directing the government to submit certain video evidence. The items are four videos and one photograph that are exhibits 1 through 5. The government has no objection to the public release of these exhibits. The government will make the following video exhibits and photo exhibit available to the Court electronically:

1. Exhibit 1 is a Closed Circuit Video (CCV) from the U.S. Capitol Police at 2:22 p.m. that is 59 seconds long. The Defendant is seen entering the Capitol building at the 00:44 second mark of the video. He walks through the broken Senate Wing doors, with his phone in the air. He then turns to the right and continues down the hallway.
2. Exhibit 2 is a CCV from the U.S. Capitol Police at 2:30 p.m. that is 1 minute and 59 seconds long. At the 00:49 time stamp the Defendant is seen entering the Rotunda. The Defendant then walks halfway across the Rotunda and looks around. The Defendant then turns around and walks out of the Rotunda while appearing to make a call on his phone. The Defendant leaves the view of the camera at the 01:16 time stamp.
3. Exhibit 3 is a CCV from the U.S. Capitol Police at 2:31 p.m. that is 1 minute and 59 seconds

long. The Defendant is seen walking down a hallway in the Speaker of the House's Office suite. At the 01:00 time stamp the Defendant appears on the screen for the first time and is seen walking down the hallway while looking around. At the 01:25 time stamp the Defendant goes out of view as he continues walking down the hallway.

4. Exhibit 4 is a CCV from the U.S. Capitol Police at 2:34 p.m. that is 59 seconds long. The Defendant is first seen at the 00:40 time stamp, where the Defendant is walking quickly down the hallway towards the camera. The Defendant walks out of view of the camera at the 00:55 time stamp.
5. Exhibit 5 is a photograph from open source social media (the Defendant's telegram profile picture) that shows the Defendant outside of the U.S. Capitol. The Defendant is wearing a Trump beanie, blue jeans, and a black Proud Boys hoodie. The Defendant is posing with another individual.

Respectfully submitted,

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By: /s/ April H. Ayers-Perez
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CERTIFICATE OF SERVICE

On February 2, 2022, a copy of the foregoing was served on counsel of record for the defendant via the Court's Electronic Filing System.

/s/ April H. Ayers-Perez
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