IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

:

v. : Case No. 21-CR-107-RDM

:

BRUNO JOSEPH CUA, :

:

Defendant. :

NOTICE OF FILING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby notifies the Court of the submission of exhibits in support of the Stipulated Trial in the above-captioned matter. Copies of the exhibits have been submitted to the Court and made available to defense counsel via the government's file-sharing site, USAfx. Each exhibit is briefly identified and described below:

- Exhibit 101: United States Capitol Police (USCP) Closed-Circuit Television Video (CCTV) depicting a door to the U.S. Capitol on the Upper West Terrace. The video depicts the defendant's entrance into the U.S. Capitol. (Video length: 4 minutes)
- Exhibit 102: USCP CCTV depicting the hallway leading to the Upper West Terrace door. The video depicts the defendant walking down the hallway, going through the double doors and proceeding up the stairs. (Video length: 3 minutes, 59 seconds)
- Exhibit 103: USCP CCTV depicting the Rotunda. The defendant is seen walking around the Rotunda. (Video length: 5 minutes)
- Exhibit 104: USCP CCTV depicting the East Rotunda Door. The defendant is seen walking out from the Rotunda, turning right and walking up the stairs. (Video length: 2 minutes, 30 seconds)
- Exhibit 105: USCP CCTV depicting the Gallery Stairs. The defendant is seen walking up the stairs. (Video length: 1 minute)
- Exhibit 106: USCP CCTV depicting the east corridor on the third floor of the U.S. Capitol. The defendant is seen walking down the hallway and attempting to open a number of doors. (Video length: 1 minute, 57 seconds)

- Exhibit 107: USCP CCTV depicting the southeast hallway near the Senate Gallery.
 The defendant is seen turning left from the previous hallway, walking down the
 hallway to a door to the Senate Gallery, interacting with two U.S. Capitol Police
 officers and then entering the Senate Gallery through the doors. (Video length: 1
 minute 41 seconds)
- Exhibit 108: USCP CCTV depicting a hallway off the stairs on the second floor of the U.S. Capitol. The defendant is seen walking down the hallway toward the camera and turning left to walk down the stairs. (Video length: 4 minutes)
- Exhibit 109: USCP CCTV depicting the hallway leading to the Senate Carriage Door on the first floor of the U.S. Capitol. The defendant is seen, flanked by police officers, walking down the hallway toward the camera. (Video length: 2 minutes and 1 second)
- Exhibit 110: USCP CCTV depicting the Senate Carriage Door. The defendant is seen exiting through the door and turning left (Video length: 2 minutes)
- Exhibit 201: Video taken by another rioter depicting the defendant's entrance into the U.S. Capitol through the Upper West Terrace Door. (Video length: 7 seconds)
- Exhibit 202: Video taken by another rioter depicting the defendant's entrance into the U.S. Capitol through the Upper West Terrace Door (Video length: 3 minutes, 5 seconds)
- Exhibit 203: Video taken by another rioter depicting the defendant's entrance into the U.S. Capitol through the Upper West Terrace Door (Video length: 3 minutes, 24 seconds)
- Exhibit 204: Video taken by another rioter depicting the defendant's travel through the U.S. Capitol, including his actions on the third floor of the U.S. Capitol, outside and inside the Senate Gallery. (Video length: 5 minutes 48 seconds)
- Exhibit 205: Video taken by another rioter depicting the defendant in the Senate Gallery. (Video length: 30 seconds)
- Exhibit 206: Video taken by another rioter depicting the defendant on the Senate Floor sitting at the desk of the Vice President. (Video length: 7 seconds)
- Exhibit 207: Video taken by another rioter depicting the defendant in the Senate Gallery. (Video length: 15 seconds)
- Exhibit 208: Video taken by another rioter depicting the defendant's travel through the U.S. Capitol, including his actions on the third floor of the U.S. Capitol, outside

and inside the Senate Gallery and on the Senate Floor. (Video length: 10 minutes, 24 seconds)

- Exhibit 209: Video taken by another rioter depicting the defendant in the Senate Gallery and on the Senate Floor. (Video length: 5 minutes, 15 seconds)
- Exhibit 210: Video published by The New Yorker entitled "A Reporter's Video from Inside the Capitol Siege" depicting the defendant on the Senate Floor. (Video length: 12 minutes, 32 seconds)
- Exhibit 211: Video depicting the defendant on the Senate Floor. (Video length: 4 minutes, 59 seconds)
- Exhibit 212: Video depicting the defendant climbing scaffolding on the west side of the U.S. Capitol building. (Video length: 47 seconds)
- Exhibit 214: Video depicting the defendant walking along the inaugural stage on the west side of the U.S. Capitol. (Video length: 38 seconds)
- Exhibits 301 to 305: Senate Recording Studio video footage depicting the defendant in the Senate Gallery and on the Senate Floor.
- Exhibit 306: Compilation of Senate Recording Studio video footage and United States Capitol Police radio runs depicting the defendant on the Senate floor.
- Exhibits 702 to 741: Statements made on Parler by the defendant using account PatriotBruno.
- Exhibits 802 to 809: Statements made on Instagram by the defendant using account Bruno Cua.
- Exhibit 810: Summary of Instagram exhibits.
- Exhibits 902 to 993: Statements made on Instagram by the defendant using account Bruno Cual 776.
- Exhibits 1201A-D: Photographs depicting the defendant on the morning of January 6, 2021.

Respectfully submitted,

MATTHEW M. GRAVES United States Attorney DC Bar No. 481052

By: /s/ Kaitlin Klamann

KAITLIN KLAMANN
Assistant United States Attorney
601 D Street NW
Washington, D.C. 20530
IL Bar No. 6316768
(202) 252-6778
Kaitlin.klamann@usdoj.gov

CAROLINA NEVIN Assistant United States Attorney 601 D Street NW Washington, D.C. 20530 NY Bar No. 5226121 (202) 803-1612 Carolina.Nevin@usdoj.gov