

**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. :

SECOND 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 June 7, 2022 Minute Order directing the government to submit certain video evidence. The items are three videos that are exhibits 6 through 8¹. The government has no objection to the public release of these exhibits, and counsel for the Defendant has represented to the government that she also does not object to the public release of these exhibits. The government will make the following video exhibits available to the Court electronically:

1. Exhibit 6 is a Closed Circuit Video (CCV) from the U.S. Capitol Police at 2:24 p.m. that is 59 seconds long. The Defendant is seen entering the Crypt at the 00:12 time stamp of the video. The Defendant walks across the Crypt before joining into a crowd of people near the middle of the Crypt. A screenshot from this Exhibit is located on page 6 of the Government’s Sentencing Memorandum. [Dkt. No. 37, p. 6]
2. Exhibit 7 is a CCV from the U.S. Capitol Police at 2:29 p.m. that is 1 minute long. At the 00:27 time stamp the Defendant is seen walking through the Memorial Door area. The Defendant can first be seen on the lower left-hand corner of the screen. The Defendant leaves the view of the

¹ On February 2, 2022 a “Notice of Filing of Items Incompatible with CM/ECF Filing” was filed by the Government. That filing identifies Exhibits 1 through 5. [Dkt. No. 28]

camera at the 00:40 time stamp. A screenshot from this Exhibit is located on page 6 of the Government's Sentencing Memorandum. [Dkt. No. 37, p. 6]

3. Exhibit 8 is a CCV from the U.S. Capitol Police at 2:32 p.m. that is 1 minute and 59 seconds long. At the 00:22 time stamp another rioter is seen kicking in the door that leads to the Speaker of the House's office area. At the 00:29 time stamp the Defendant is seen walking towards, and then through, that same door that had just been kicked in. The Defendant leaves the camera view at the 00:41 second time stamp as he enters the Speaker of the House's office area. At the 01:13 time stamp the Defendant emerges from the Speaker of the House's office area and continues on down the hallway. The Defendant disappears from view at the 01:18 time stamp. Two screenshots from this Exhibit are located on page 8 of the Government's Sentencing Memorandum. [Dkt. No. 37, p. 8]

Respectfully submitted,

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CERTIFICATE OF SERVICE

On June 9, 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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