

**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. :

JOINT RESPONSE TO JUNE 14, 2022 MINUTE ORDER

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the Defendant, Lawrence Earl Stackhouse, by and through his attorney, file this joint response to June 14, 2022 Minute Order:

“Gates” Clarification

- (a) Both parties used the term “gates” in their sentencing memoranda. See ECF No. 37, p. 9-10; ECF No. 40, p. 7, 18. The “gates” are bicycle racks that were located in several areas around the U.S. Capitol building and ground. One June 15th, the parties determined that the specific video cited in the Defendant’s sentencing memoranda at page 7 are bike racks located near the northeast corner of the U.S. Capitol building, near the Senate Carriage Doors.
- (b) Both parties also determined that Mr. Stackhouse was not present at the bike racks near the Senate Carriage Doors at the time the footage was taken.
- (c) Various video footage shows that law enforcement was overwhelmed by rioters at the bike racks. There remains a dispute as to whether video footage shows that law enforcement officers opening the gates in response to being overwhelmed by the rioters. Footage also shows law enforcement clashing with rioters at the bike racks and using bike racks to keep rioters out of the Capitol building. The parties have not

been able to review all footage showing every bike rack surrounding the U.S. Capitol. The volume of video footage is extensive in all January 6th cases. The government has determined that the majority of rioters were walking around the bike racks.

Gentleman “Leading the Crowd”

- (a) The identity of the “gentleman leading the crowd” is known to counsel for the Government.
- (b) This gentleman is not wearing any Trump clothing or carrying any Trump signs.
- (c) It has been represented to counsel for the Government that the “gentlemen leading the crowd” did not have the authority to be present in the Capitol on January 6, 2021.
- (d) As of this time, the “gentleman leading the crowd” has not been charged for offense conduct on January 6, 2021.

Respectfully submitted,

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