

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

UNITED STATES OF AMERICA

v.

JOHNNY HARRIS,

Defendant.

:
:
:
:
:
:
:
:
:

No.: 21-cr-274 (RDM)

January 27, 2023

NOTICE OF FILING: GOVERNMENT’S PRELIMINARY EXHIBIT LIST

During the trial of the above-captioned matter, the United States of America expects to seek to admit the exhibits listed below. Please note that this is a preliminary exhibit list, and subject to revision. The government has included several stipulations that it has proposed to defense counsel; however, these stipulations have not yet been formally executed. Finally, the government anticipates creating “screenshots” from each of the videos listed below that will be included as sub-exhibits in the government’s final exhibit list.

Respectfully submitted,

MATTHEW M. GRAVES
UNITED STATES ATTORNEY
D.C. Bar No. 481052

By: /s/ Will N. Widman
WILL N. WIDMAN
KATHERINE E. BOYLES
ASSISTANT U.S. ATTORNEYS
NC Bar No. 48158
D. Conn. Fed. Bar No. PHV20325
United States Attorney’s Office
601 D Street NW
Washington, D.C. 20530
Phone: 202-353-8611
Will.Widman@usdoj.gov
Katherine.Boyles@usdoj.gov

GOVERNMENT'S PRELIMINARY EXHIBIT LIST

Exhibit No.	Description	Witness	Marked for ID	Received in evidence	Published
<i>OVERVIEW VIDEOS, CAPITOL BUILDING, & GROUNDS</i>					
001	USCP CCV Montage				
002	House & Senate Video Montage				
003	Certification of Congressional Videos				
004	Capitol Building & Grounds – 1946 Survey Map				
005	Capitol Building & Grounds – Restricted Perimeter Map				
006	Capitol Building & Grounds – Aerial View				
007	Capitol Building – 3D Map				
008	Capitol Building – Diagram				
009	Photographs of Capitol Grounds & USCP “Area Closed” Signs (5)				
009a	Photograph of Capitol Grounds				
009b	USCP Area Closed Signs				
009c	USCP Area Closed Signs				
009d	USCP Area Closed Signs				
009e	USCP Area Closed Signs				
010	Closure of West Front Police Order				
011	Ground Closure Announcement				
<i>U.S. CAPITOL POLICE CLOSED-CIRCUIT VIDEO</i>					
100	USCP CCV 0126				
101	USCP CCV 0171				
102	USCP CCV 0180				
103	USCP CCV 0686				
104	USCP CCV 0912				
105	USCP CCV 0959				
106	USCP CCV 0960				
107	USCP CCV 7029				
<i>BODY WORN CAMERA</i>					
200	MPD Officer Darrin Bates – 13:13				
201	MPD Officer Darrin Bates – 14:56				

202	MPD Officer Darrin Bates – 15:17				
203	MPD Officer Darrin Bates – 15:53				
204	MPD Officer Darrin Bates – 16:44				
205	MPD Officer Darrin Bates – 19:15				
206	MPD Officer Darrin Bates – 21:44				
207	MPD Officer Chapman – 13:10				
208	MPD Officer Edward Choi – 10:59				
209	MPD Officer Edward Choi – 15:02				
210	MPD Officer Edward Choi – 15:17				
211	MPD Officer Edward Choi – 15:27				
212	MPD Officer Matthew Fleming – 14:22				
213	MPD Officer Brandon Joseph – 15:02				
214	MPD Officer Dustin Nevel – 13:06				
215	MPD Officer Dustin Nevel – 14:44				
216	MPD Officer Dustin Nevel – 15:08				
217	MPD Officer Dustin Nevel – 16:20				
218	MPD Officer Dustin Nevel – 19:15				
219	MPD Officer Brian Yi – Jan 5				
220	MPD Officer Brian Yi – 14:44				
221	MPD Officer Brian Yi – 15:54				
222	MPD Officer Brian Yi – 19:17				
223	Charlotte – Officer William Beaver				
OPEN-SOURCE VIDEOS					
300	BitChute – BigJim				
301	DLive – BakedAlaska				
302	DLive - CancelledTendies				
303	Facebook – ben.swann3				
304	Facebook – luyen.tran.5245				
305	Facebook – Real Stl News				
306	Facebook – w_bender14				
307	Getty Images – ITN RUSHES				
308	InfoWars – RAW FOOTAGE Wild Protest				
309	Instagram – chenoopi chenoopi				
310	Twitter – Qofficiel Quotidien				
311	YouTube – Eddie Block Films				
312	YouTube – Former Wagie				

313	YouTube – FreedomNewsTV, Proud Boys Clash with BLM and Police				
314	YouTube – FreedomNewsTV, SCOOTERCASTER				
315	YouTube – Houzmazoo Network				
316	YouTube – Joe Goldberg				
317	YouTube – Ken Oberkrom				
318	YouTube – Townhall Media				
<i>PHOTOGRAPHS</i>					
400	Driver's License Photograph				
401	Media Photo in Rotunda				
402	Open Source - Alamy				
403	Open Source – Flickr Elvert Barnes-1				
404	Open Source – Flickr Elvert Barnes-2				
405	Open Source – Flickr Roy_17				
406	Open Source – Getty Images				
407	Open Source – Imago-Images				
408	Open Source – Redux Pictures				
409	Open Source – SIPA				
410	Open Source – Will Allen-DuPraw				
<i>SOCIAL MEDIA & CELLULAR PHONE</i>					
500	Facebook Account – Search Warrant Return				
501	Phone – CART Report				
<i>PHYSICAL EVIDENCE & PHOTOGRAPHS FROM SEARCH</i>					
600	Shower Rod				
601	Hat				
602	Neck Gaiter				
603	Residence Search Warrant Photos				
<i>LEGAL AUTHORITY</i>					
700	U.S. Constitution, Amendment XII				
701	3 U.S.C. § 15				
702	3 U.S.C. § 16				
703	3 U.S.C. § 17				
704	3 U.S.C. § 18				

705	Concurrent Resolution				
<i>STIPULATIONS (Tentative)</i>					
800	Capitol Building & Grounds				
801	Cellular Phone				
802	Certification of Electoral College Vote				
803	Facebook Account				
804	House & Senate Video Montage				
805	Identity				
806	MPD Body Worn Camera Video				
807	Officers from USCP & MPD				
808	Open-Source Video				
809	Physical Items & Search Warrant Photographs				
810	Stipulated Witness Testimony – USCP Lt. George McCree				
811	Stipulated Witness Testimony – USSS Inspector Lanelle Hawa				
812	USCP Closed-Circuit Video				
813	USCP CCV Montage				