UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

:

v. : Case No. 22-cr-242 (TSC)

:

CHRISTINE PRIOLA, :

:

Defendant. :

GOVERNMENT'S NOTICE OF FILING OF EXHIBITS PURSUANT TO LOCAL CRIMINAL RULE 49 AND STANDING ORDER 21-28

The United States hereby gives notice, pursuant to Local Criminal Rule 49 and Standing Order 21-28, of the following exhibits provided to the Court and defense counsel and to be used by the government in the sentencing in this matter. The exhibits are videos and clips of videos filmed by other rioters who participated in the breach of the Capitol on January 6, 2021. The government obtained these exhibits through the course of its large investigation into the breach. The United States does not object to the release of these exhibits to the public. The exhibits are as follows:

- Government Exhibit 1 is a video approximately 26 seconds in length that shows the crowd behind the barricades on the east side of the Capitol. People in the crowd can be heard chanting, "Stop the steal." Priola's sign can be seen in the crowd.
- 2. Government Exhibit 2 is a video approximately 1 minute and 23 seconds in length that shows the rioters outside the East Rotunda (Columbus) doors, including some rioters reacting to pepper gas. Priola and her sign can be seen while she is standing about 15-20 feet from the entrance. People in the crowd can be heard chanting, "USA, USA."

¹ The government's sentencing memorandum incorrectly stated that the crowd could be heard chanting "Stop the steal" and "Who's our President? Trump!" during this video. ECF No. 56 at 10.

- 3. Government Exhibit 3 is a video approximately 3 minutes in length that shows rioters outside the East Rotunda doors attempting to enter the Capitol building. Priola's sign can be seen in the crowd outside. The video also shows the doors being forced open from the inside and Priola (now inside the building) talking to another rioter on camera and walking down the corridor. People in the crowd can be heard chanting, "Who's our President? Trump!"; yelling, "Tear it down"; and later chanting, "Defend your Constitution. Defend your liberty."
- 4. Government Exhibit 4 is a video approximately 26 seconds in length that shows the breach of the East Rotunda doors. Priola's sign can be seen outside the building through the open doors.
- 5. Government Exhibit 5 is a video approximately 2 minutes and 30 seconds in length that shows the rioters breaching the East Rotunda doors. Priola can be seen with her sign soon after she enters the building.
- 6. Government Exhibit 7² is a video approximately 1 minutes and 28 seconds in length that shows the rioters, including Priola, walking down the east corridor inside the Capitol Building. It also shows Priola holding her sign up to one of the windows and tapping on the glass to get the attentions of rioters outside. Rioters can be heard chanting, "Defend your Constitution. Defend your liberty." and "Who's house? Our house."

² The government inadvertently skipped No. 6 when naming the exhibits in the sentencing memorandum.

7. Government Exhibit 8 is a video approximately 14 seconds in length that shows rioters, including Priola, on the Senate Chamber floor. Priola can be seen and heard talking on her cell phone.

Respectfully submitted,

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