UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

: CASE NO. 21-CR-223 (APM)

:

MATTHEW MARK WOOD,

v.

.

Defendant. :

NOTICE OF FILING OF GOV'T VIDEO EXHIBITS PURSUANT TO LCrR 49

Pursuant to LCrR 49(e)(1) and Standing Order No. 21-28 (BAH), the government hereby gives notice of the following video exhibits in support of the government's sentencing memorandum (ECF No. 55). These videos will be provided to the Court and all counsel via a secure filesharing platform. Due to the length of some videos, the government recommends that the Court and Counsel review them prior to the hearing so that the government may incorporate them by reference at the hearing. Should the Court or Counsel so request, however, the government will be ready to show any video in its entirety at the hearing.

The government has no objection to the public release of these videos.

GOV'T EXHIBIT 06 (06a-06x)

Type: Video File Type: .mp4 Length: Varies

Source: Videos recovered from Wood's cellphone.

Description: These 24 videos were recovered from Woods cellphone and appear to have

been recorded by Wood.

GOV'T EXHIBIT 07 (07a-07c)

Type: Video File Type: .mp4 Length: Varies

Source: Videos recovered from Wood's cellphone.

Description: These three videos were recovered from Woods cellphone and appear to

have been recorded by Wood. These three videos were recorded when

Wood was atop the media tower in the West Plaza.

GOV'T EXHIBIT 08

Type: Video File Type: .mp4

Length: 00 min 54 seconds

Source: TikTok

Description: Another rioter recorded this video while Wood (who appears at the 00:08

mark) and others were under the NW scaffolding and attacking the police line on the landing of the NW stairs. Even at this point, their intent was clearly to storm the Capitol. The rioter, who is within an arm's length of

Wood, can be heard saying,

They're shooting at us. [...] We're taking over the Capitol. [...] It's getting' ugly in here, but we can do it. We're gonna take this fucker down. We're going to get into the Capitol. [...] Alright, it's time to fuck this shit up. Alright, they're shootin', they're shootin' all over.

GOV'T EXHIBIT 09

Type: Video File Type: .mp4

Length: 00 min 38 sec Source: YouTube

Description: An individual who was present at the Capitol riot and took photographs

while on restricted grounds recorded and posted a video in which he displays those photographs and talks about them. In this excerpt, the

videographer talks about his photographs of Wood.

Type: Video File Type: .mp4

Length: 01 min 01 sec

Source: Another Rioter's Cellphone Video

Description: This video was recorded from the NW Lawn as rioters attacked the police

line on the landing of the NW staircase. The video shows Wood standing on the balustrade of the staircase facing out towards the rioters on the lawn waving his flag and yelling. The video also shows Wood in close proximity

to the police line as it falls and the rioters rush forward.

GOV'T EXHIBIT 11

Type: Video File Type: .mp4

Length: 00 min 47 sec

Source: Another Rioter's Cellphone Video

Description: This video was recorded from the NW Lawn as rioters continued to surge

up towards the Capitol. Wood is seen in a prominent position waving his flag at the 00:16 mark as the videographer pans around showing the

chanting rioters.

GOV'T EXHIBIT 12

Type: Video File Type: .mp4

Length: 03 min 20 sec

Source: Another Rioter's Video

Description: This video shows the progression of one rioter who ended up in close

proximity to Wood as they entered the Small House Rotunda (2nd floor) and the House Speaker's suite of offices. As they enter the hallway, the

rioters shout:

Fuck you, Nancy! Fuck you, Nancy! You're a turkey vulture [indecipherable]. Nancy Pelosi . . . [indecipherable]. Yeah, tear her office apart, that little cunt. Yeah, where's the little cunt? Where's the little cunt? Time to go! Time to go, Nancy! Yeah, time to get outta here. Speaker Pelosi! Where you at? Where's the traitor?

Type: Video File Type: .mp4

Length: 02 min 51 sec

Source: Another Rioter's Cellphone Video

Description: This video was recorded as Wood and others invaded the House Speaker's

suite of offices.

GOV'T EXHIBIT 14

Type: Video File Type: .mp4

Length: 01 min 32 sec

Source: Another Rioter's Cellphone Video

Description: This video was recorded as Wood and others invaded the House Speaker's

suite of offices.

GOV'T EXHIBIT 15

Type: Video File Type: .mp4

Length: 02 min 47 sec

Source: 60 Minutes (YouTube)

Description: This video is an excerpt of the 60 Minutes program in which Lesley Stahl

spoke with House Speaker Nancy Pelosi about the experience of the Speaker and specifically of her staff who were in the Speaker's suite of

offices as the rioters, including Wood, invaded.

GOV'T EXHIBIT 16

Type: Video File Type: .mp4

Length: 00 min 46 sec

Source: Excerpt from Open-Source Intelligence (OSINT)

Description: This is an excerpt from a publicly available video that shows Wood resisting

and pushing police officers while calling for others to help. The clip is shown once in its original form, once in slow motion, and then once again

at normal speed.

Type: Video File Type: .mp4

Length: 02 min 55 sec

Source: Excerpt from Open-Source Intelligence (OSINT)

Description: This is an excerpt from a publicly available video that shows Wood resisting

and pushing police officers while calling for others to help. The clip is shown once in its original form, once isolated at normal speed, and once in slow motion. The video also isolates other moments in which Wood is seen waving his flag in the faces of police officers even as they direct the rioters

to leave the Rotunda.

GOV'T EXHIBIT 18

Type: Video File Type: .mp4

Length: 14 min 04 sec Source: USCP CCV

Description: A compilation of surveillance video showing Wood from the moment he

emerged through a hole torn in the tarp covering the scaffolding of the Inaugural beachers through the time when he rushed up to the Senate Wing Doors. Wood stood there riling up the rioters by waving his flag, yelling, and beckoning them forward for approximately eight minutes. Despite his statements to the contrary, the video shows Wood running freely,

voluntarily, and excitedly up to the Capitol.

GOV'T EXHIBIT 19 (19a-19d)

Type: Video
File Type: .mp4
Length: Varies
Source: USCP CCV

Description: These three videos trace Wood on his path through the Capitol. For

approximate times of the locations shown, please reference GOV'T

EXHIBIT 02.

Type: Video File Type: .mp4

Length: 03 min 12 sec

Source: Open-Source Intelligence (OSINT)

Description: This video combines two videos, one recorded by a rioter and another

recorded by an individual who was inside of the Capitol when the rioters breached. Both videos show the progress of the rioters from the Senate Wing Door to the Ohio clock corridor. Specifically, the video shows how the group, of which Wood was a part, pursued USCP officer Goodman up the staircase from the first floor to the second floor on the NE side of the

Capitol.

GOV'T EXHIBIT 21

Type: Video File Type: .mp4

Length: 06 min 00 sec

Source: Open-Source Intelligence (OSINT)

Description: This video was recorded in the Rotunda as rioters took a stand against USCP

and MPD officers who were attempting to clear the Rotunda. The rioters can be heard singing the Star Spangled Banner just before fighting with police officers in the Great Rotunda of the U.S. Capitol. Wood and his flag may be seen beginning at approximately 01:08. Wood aggressively waves his flag over the heads and in the faces of the police officers. Beginning at the 01:50 mark, Wood is seen pushing his side and back directly against

police officers until one officer finally succeeds in deterring Wood.

Respectfully submitted,

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Ву:

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