

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-CR-223 (APM)
v.	:	
	:	
MATTHEW MARK WOOD,	:	
	:	
Defendant.	:	

**JOINT NOTICE OF FILING OF GOV'T AND DEFENSE
VIDEO EXHIBITS PURSUANT TO LCrR 49**

Pursuant to LCrR 49(e)(1) and Standing Order No. 21-28 (BAH), the government and defense counsel hereby give notice of the following video exhibits in support of the parties' respective sentencing memoranda (ECF Nos. 55, 56). These videos have been provided to the Court and all counsel via a secure filesharing platform. Due to the length of some videos, the parties recommend that the Court and Counsel review them prior to the hearing so that insofar as is possible and if desired, the parties may incorporate the exhibits by reference at the sentencing hearing. Should the Court or Counsel request, however, the parties will be ready to show any video in its entirety at the hearing.

At this time, the parties have no objection to the public release of these videos.

Government Video Exhibits

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

<i>Type:</i>	Video
<i>File Type:</i>	.mp4
<i>Length:</i>	Varies
<i>Source:</i>	Videos recovered from Wood's cellphone.
<i>Description:</i>	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.

GOV'T EXHIBIT 10

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 c***. Yeah, where's the little c***? Where's the little c***? Time to go! Time to go, Nancy! Yeah, time to get outta here. Speaker Pelosi! Where you at? Where's the traitor?

GOV'T EXHIBIT 13

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.

GOV'T EXHIBIT 17

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.

GOV'T EXHIBIT 20

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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Defendant's Video Exhibits

Defendant's Exhibits 2A-5B have been removed as they are contained in Gov't Exhibits 18, 19a, 19c, and 19d.

The Defendant has the following areas he wishes to be viewed as exhibits within Gov't Exhibits 18, 19a, 19c, and 19d:

Government Exhibit 18 – From 00 min 00 sec through 07 min 46 sec (Wood waving flag in scaffolding not part of group that overruns officers at top of stairs) and from 12 min 33 sec to the end. (Wood on upper west terrace not at Senate Doors at time of initial breach).

Government Exhibit 19a – From 00 min 00 sec to 01 min 58 sec (Senate Wing Door entry), from 03 min 04 sec through 04 min 23 sec (Hall leading to Ohio Clock Corridor Wood is 30th person back in a winding stairwell), and from 04 min 24 sec through 06 min 00 sec (Ohio Clock Corridor where Wood stays father back from confrontation with officers).

Government Exhibit 19c – From 00 min 00 sec through 01 min 56 sec. (Wood takes pictures in Rotunda).

Government Exhibit 19d – From 00 min 00 sec to 00 min 52 sec (Wood walks in distracted with his phone. Sees line of cops but does not approach area and exits Rotunda another way); from 17 min 58 sec through 19 min 24 sec (Wood waiting to exit at clogged and chaotic Rotunda doors, gets info on exiting from bicycle cop); and from 28 min 43 sec to the end.(Wood trying to exit at Rotunda doors and ultimately does but it takes a long time to get out).

DEFENDANT'S EXHIBIT 05c

Type: Video
File Type: .mp4
Length: Varies
Source: Wood's Cellphone
Description: This video was recorded by Wood near the East Rotunda Door exit. This video shows difficulty exiting the doors.

DEFENDANT’S EXHIBIT 06

Type: Audio
File Type: .mp4
Length: 11 min 21 sec
Source: FBI
Description: This recording is the tips line audio of Wood. Wood turns himself in to FBI tip line.

DEFENDANT’S EXHIBIT 07

Type: Image
File Type: .jpg
Length: n/a
Source: Wood’s cellphone
Description: This image shows a text sent by Wood. Wood expresses instant remorse to friend.

DEFENDANT’S EXHIBIT 08

Type: Video
File Type: .mov
Length: 02 min 26 sec
Source: Cellphone video
Description: This video shows the area between the Rotunda and the foyer between the Rotunda and the East Rotunda Door exit. Chaos and difficulty exiting in Rotunda.

DEFENDANT’S EXHIBIT 09

Type: Video
File Type: .mp4
Length: 15 min 54 sec
Source: Recorded Video Statement
Description: This video features videorecorded statements from Wood, his father, and a friend that are addressed to the Court to aid in sentencing.

By: /s/
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