

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

UNITED STATES OF AMERICA :
 :
v. : **CASE NO. 21-cr-263 (TSC)**
 :
RUSSELL DEAN ALFORD, :
 :
Defendant. :

GOVERNMENT RESPONSE TO DEFENDANT’S EXHIBIT LIST

Pursuant to the Court’s Scheduling Order, the government respectfully files this response to the defendant’s Exhibit List and, to the extent practicable, makes the following objections and statements about the defense proposed Exhibits.

Exhibits 1-3. National Park Service Maps with U.S. Capitol and Surrounding Area. The government does not object to the maps.

Exhibits 4-6. Maps of U.S. Capitol Grounds and Building showing locations of USCP CCTV video cameras. The government objects to these exhibits. *See* ECF No. 51. The government understands, after discussion with the defense, that that defense will withdraw these Exhibits conditioned upon their ability to reasonably explain the area depicted in the camera views without disclosing the location of the cameras. *See* ECF No. 62. The government does not anticipate any difficulty in explaining the area depicted in the camera photos/videos, whether that be through testimony, stipulation, or agreement.

Photos or Videos taken from Alford’s cell phone. The government does not object to any photos or video from his phone on January 6, from the rally, capitol grounds, or inside the Capitol. These Exhibits include Exhibits 7- 16, Exhibits 23 & 24, Exhibits 29 & 32, and Exhibit 37.

USCP CCTV video and MPD Body Worn Camera (BWC) video. The government does not object to the authenticity of the of CCTV or BWC video or stills. The government reserves the right to object at trial based upon relevance (FRE 401) or prejudice, confusion, waste or time, or other reasons (FRE 403). These Exhibits include Exhibits 25 – 28, Exhibit 33, Exhibits 34 – 36, and Exhibits 38 – 42.

Exhibit 48 - 49. Photos of Alford's Body shop. The government does not object to the authenticity or origin the exhibits. The government reserves the right to object at trial based upon relevance (FRE 401) or prejudice, confusion, waste or time, or other reasons (FRE 403).

WHEREFORE, the government files this response to the defendant's noticed trial exhibits pursuant to this Court's scheduling order. ECF No. 48.

Respectfully submitted,

Matthew M. Graves
United States Attorney
D.C. Bar No. 481052

/s/ James D. Peterson

James D. Peterson
Special Assistant United States Attorney
Bar No. VA 35373
United States Department of Justice
1331 F Street N.W. 6th Floor
Washington, D.C. 20530
Desk: (202) 353-0796
Mobile: (202) 230-0693
James.d.peterson@usdoj.gov

s/ Michael J. Romano
MICHAEL J. ROMANO

IL Bar No. 6293658
Trial Attorney, Detailee
555 4th Street, N.W.
Washington, DC 20530
Michael.Romano@usdoj.gov
(202) 307-6691