

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

UNITED STATES OF AMERICA

v.

**KRISTI MUNN,
THOMAS MUNN,
DAWN MUNN,
JOSHUA MUNN,
KAYLI MUNN,**

Defendants.

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Criminal No. 1:21-cr-474

Honorable Chief Judge Beryl A. Howell

**UNITED STATES' REPORT AND POSITION REGARDING PUBLIC
RELEASE OF PHOTO AND VIDEO EVIDENCE RE: THE MUNN DEFENDANTS**

The United States will make the following video and photo evidence available to the Court electronically in preparation for the plea hearings and sentencings of the defendants in the above referenced matter:

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
1	20210106-FELONYRIOTIN G-CAPITAL_BUILDING.mp4_clip_1633_1656	MPD BWC	00:23	Upper West Terrace
2	USCH 01 Crypt East - 2021-01-06_19h20min01s.mp4_clip_588_639 HIGHLY SENSITIVE.mp4	Capitol Police	00:51	Crypt East

2 UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA UNITED STATES OF AMERICA::
v.: Criminal No. 1:21-cr-474: KRISTI MUNN.; Honorable Chief Judge Beryl A. Howell THOMAS MUNN.; DAWN
MUNN.; JOSHUA MUNN.; KAYLI MUNN.; Defendants.: UNITED STATES' REPORT AND POSITION

REGARDING THE RELEASE OF PHOTO AND VIDEO EVIDENCE RE: THE MUNN DEFENDANTS	Location
United States will make the following video and photo evidence available to the Court electronically in preparation for the plea hearings and sentencings of the defendants in the above referenced matter: # File Name Source Length and Location Relevant Depicted Portion If Applicable 1 20210106 MWD BWC Upper West FELONYRIOTIN 00:23 Terrace G- CAPITAL_BUIL DING.mp4_clip_1 631 1 00:01 Crypt Capitol Police	Relevant Portion
00:51 Crypt East East - 2021-01-06_19h20min01s.mp4_clip_588_63 9 HIGHLY SENSITIVE.mp4 2 # File Name Source Length and Location Relevant Depicted Portion If Applicable 3 USCH 01 Capitol Police 00:45 Memorial Door Memorial Door - 2021-01-06_19h31min24s.mp4_clip_865_91 0 HIGHLY SENSITIVE 4 USCS 01 Crypt Capitol Police 00:47 Crypt Lobby East Lobby East - 2021-01-06_19h19min01s.mp4_clip_690_73 8 HIGHLY SENSITIVE 5 USCS01 SenateWi Capitol Police 00:32 Senate Wing ngDoor nearS139_Door 2021-01-06_14h20min18s0 87ms.mp4_clip_29 4_326 HIGHLY SENSITIVE.mp4 6 USCS01 SenateWi Capitol Police 00:56 Senate Wing ngDoor nearS139_Door 2021-01-06_15h13min58s9 20ms.mp4_clip_15 5_211 HIGHLY SENSITIVE.mp4 7 USCS 01 Crypt Capitol Police 5:09 Crypt Lobby East Lobby East - 2021-01-06_19h31min20s.mp4_clip_0_309 HIGHLY SENSITIVE.mp4 2 2 # File Name Source Length and Location Relevant Depicted Portion If Applicable 8 1610059213.11-DLive 3:58 Senate Wing, df96bf84f5d9dc7d Room S-145 1049ef578c2a01b0d101e19a-file-0_10p1 TRUMP RALLY DC DLive - 3HgZco- GR.mp4_clip_134 2_155 00:09 image_00000.jpeg Image from Facebook N/A N/A account of Tom Munn - private message to Josh Munn 10 image_00001.jpeg Image from Facebook N/A N/A account of Tom Munn - private message 11 image_00002.jpeg Image from Facebook N/A N/A account of Tom Munn - comment on photo 12 image_00003.jpeg Image from Facebook N/A N/A account of Tom Munn - photo 13 image_00004.jpeg Image from Facebook N/A N/A account of Tom Munn - photo 14 image_00005.jpeg Image from Facebook N/A N/A account of Tom Munn - photo 15 image_00006.jpeg Image from Facebook N/A N/A account of Tom Munn - photo 16 image_00007.jpeg Image from Facebook N/A N/A account of Tom Munn - status 17 image_00008.jpeg Image from Facebook N/A N/A account of Dawn Munn - status 3 2 # File Name Source Length and Location Relevant Depicted Portion If Applicable 18 image_00009.jpeg Image from Facebook N/A N/A account of Tom Munn - photo 19 image_00010.jpeg Image from Facebook N/A N/A account of Tom Munn - status, photo, private message 20 image_00011.jpeg Image from Facebook N/A N/A account of Tom Munn - status, photo, private message 21 image_00020.jpeg Image from Facebook N/A N/A account of Dawn Munn - photo 22 image_00021.jpeg Image from Facebook N/A N/A account of Tom Munn - private messages, photo 23 image_00022.jpeg Image from Facebook N/A N/A account of Tom Munn - private messages, photo, status 24 image_00023.jpeg Image from Facebook N/A N/A account of Dawn Munn - photo 25 image_00024.jpeg Image from Facebook N/A N/A account of Dawn Munn - status and photo 26 image_00026.jpeg Image from Facebook N/A N/A account of Tom Munn - private message 27 image_00027.jpeg Image from Facebook N/A N/A account of Tom Munn - private messages 28 image_00028.jpeg Image from Facebook N/A N/A account of Tom Munn - sent by Tom Munn to multiple FB user 29 image_00030.jpeg Image from Facebook N/A N/A account of Tom Munn 4 2 # File Name Source Length and Location Relevant Depicted Portion If Applicable 30 image_00037.jpeg Image from Facebook N/A N/A account of Tom Munn - photo 31 image_00053.jpeg Photo from Facebook N/A Unknown road account of Minor Child-1 to Facebook account of Tom Munn 32 image_00059.jpeg Photo from Facebook N/A Hotel room account of Dawn Munn - photos, Dawn sent to Facebook account of Kristi Munn 33 image_00060.jpeg Photo from Facebook N/A Hotel room account of Dawn Munn - photos, Dawn sent to Facebook account of Kristi Munn 34 image_00061.jpeg Photo from Facebook N/A Hotel room account of Dawn Munn - in Dawn's photos, Dawn sent to Facebook account of Kristi Munn, Dawn posted as a status, Kelsi Munn posted 35 image_00062.jpeg Photo from Facebook N/A Unknown account of Dawn Munn - photos, Dawn sent to Facebook account of Kristi Munn 36 image_00063.jpeg Photo from Facebook N/A Hotel room account of Dawn Munn - photos, Dawn sent to Facebook account of Kristi Munn 37 image_00064.jpeg Photo from Facebook N/A Hotel room account of Dawn Munn - photos, Dawn sent to Facebook account of Kristi Munn 5 2 # File Name Source Length and Location Relevant Depicted Portion If Applicable 38 image_00066.jpeg Photo from Facebook N/A Unknown account of Kristi Munn - photos 39 image_00067.jpeg Photo from Facebook N/A Unknown account of Kristi Munn - Kristi sent to Facebook account of Dawn Munn 40 image_00068.jpeg Photo from Facebook N/A Unknown account of Kristi Munn - Kristi sent to Facebook account of Dawn Munn 41 image_00069.jpeg Photo from Facebook N/A Unknown account of Kristi Munn - Kristi sent to Facebook account of Dawn Munn 42 image_00070.jpeg Photo from Facebook N/A Unknown account of Kristi Munn - Kristi sent to Facebook account of Dawn Munn 43 image_00071.jpeg Photo from Facebook N/A Unknown account of Kristi Munn - Kristi sent to Facebook account of Dawn Munn 44 image_00072.jpeg Photo from Facebook N/A Unknown account of Kristi Munn - Kristi sent to Facebook account of Dawn Munn 45 image_00073.jpeg Photo from Facebook N/A Unknown account of Kristi Munn sent to another Facebook user 6 2 # File Name Source Length and Location Relevant Depicted Portion If Applicable 46 image_00074.jpeg Photo from Facebook N/A Unknown account of Dawn Munn sent to five different Facebook users, sent to Facebook accounts of Tom Munn and Kristi Munn, Dawn commented and posted on status, Tom commented, Kelsi posted on her own Facebook account 47 image_00081.jpeg Photo from Facebook N/A Unknown account of Dawn Munn - Dawn sent to Facebook account of Kristi Munn, Dawn commented and posted on status, Dawn sent to another Facebook user, Kelsi Munn posted on her own Facebook account 48 image_00086.jpeg Photo from Facebook N/A Unknown account of Dawn Munn - Dawn sent to Facebook account of Kristi Munn, posted photo and sent to two Facebook users 49 image_00092.jpeg Photo from Facebook N/A Approach to the account of Josh Munn - sent northwest side of to Facebook account of Kelsi the Capitol Munn and another Facebook user 50 image_00093.jpeg Photo from Facebook N/A View to west account of Josh Munn - sent from Capitol to Facebook account of Kelsi Munn and another Facebook user 51 image_00094.jpeg Photo from Facebook N/A View to west account of Josh Munn - sent from Capitol to	Depicted Portion

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#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
18	image_00009.jpeg	Image from Facebook account of Tom Munn - photo	N/A	N/A
19	image_00010.jpeg	Image from Facebook account of Tom Munn – status, photo, private message	N/A	N/A
20	image_00011.jpeg	Image from Facebook account of Tom Munn – status, photo, private message	N/A	N/A
21	image_00020.jpeg	Image from Facebook account of Dawn Munn - photo	N/A	N/A
22	image_00021.jpeg	Image from Facebook account of Tom Munn – private messages, photo	N/A	N/A
23	image_00022.jpeg	Image from Facebook account of Tom Munn – private messages, photo, status	N/A	N/A
24	image_00023.jpeg	Image from Facebook account of Dawn Munn - photo	N/A	N/A
25	image_00024.jpeg	Image from Facebook account of Dawn Munn – status and photo	N/A	N/A
26	Image_00026.jpeg	Image from Facebook account of Tom Munn – private message	N/A	N/A
27	Image_00027.jpeg	Image from Facebook account of Tom Munn – private messages	N/A	N/A
28	image_00028.jpeg	Image from Facebook account of Tom Munn – sent by Tom Munn to multiple FB user	N/A	N/A
29	image_00030.jpeg	Image from Facebook account of Tom Munn	N/A	N/A

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
30	image_00037.jpeg	Image from Facebook account of Tom Munn - photo	N/A	N/A
31	image_00053.jpeg	Photo from Facebook account of Minor Child-1 to Facebook account of Tom Munn	N/A	Unknown road
32	image_00059.jpeg	Photo from Facebook account of Dawn Munn – photos, Dawn sent to Facebook account of Kristi Munn	N/A	Hotel room
33	image_00060.jpeg	Photo from Facebook account of Dawn Munn – photos, Dawn sent to Facebook account of Kristi Munn	N/A	Hotel room
34	image_00061.jpeg	Photo from Facebook account of Dawn Munn – in Dawn’s photos, Dawn sent to Facebook account of Kristi Munn, Dawn posted as a status, Kelsi Munn posted	N/A	Hotel room
35	image_00062.jpeg	Photo from Facebook account of Dawn Munn – photos, Dawn sent to Facebook account of Kristi Munn	N/A	Unknown
36	image_00063.jpeg	Photo from Facebook account of Dawn Munn – photos, Dawn sent to Facebook account of Kristi Munn	N/A	Hotel room
37	image_00064.jpeg	Photo from Facebook account of Dawn Munn – photos, Dawn sent to Facebook account of Kristi Munn	N/A	Hotel room

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
38	image_00066.jpeg	Photo from Facebook account of Kristi Munn – photos	N/A	Unknown
39	image_00067.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Dawn Munn	N/A	Unknown
40	image_00068.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Dawn Munn	N/A	Unknown
41	image_00069.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Dawn Munn	N/A	Unknown
42	image_00070.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Dawn Munn	N/A	Unknown
43	image_00071.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Dawn Munn	N/A	Unknown
44	image_00072.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Dawn Munn	N/A	Unknown
45	image_00073.jpeg	Photo from Facebook account of Kristi Munn sent to another Facebook user	N/A	Unknown

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
46	image_00074.jpeg	Photo from Facebook account of Dawn Munn sent to five different Facebook users, sent to Facebook accounts of Tom Munn and Kristi Munn, Dawn commented and posted on status, Tom commented, Kelsi posted on her own Facebook account	N/A	Unknown
47	image_00081.jpeg	Photo from Facebook account of Dawn Munn – Dawn sent to Facebook account of Kristi Munn, Dawn commented and posted on status, Dawn sent to another Facebook user, Kelsi Munn posted on her own Facebook account	N/A	Unknown
48	image_00086.jpeg	Photo from Facebook account of Dawn Munn – Dawn sent to Facebook account of Kristi Munn, posted photo and sent to two Facebook users	N/A	Unknown
49	image_00092.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user	N/A	Approach to the northwest side of the Capitol
50	image_00093.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user	N/A	View to west from Capitol
51	image_00094.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user	N/A	View to west from Capitol

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
52	image_00095.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user and another Facebook user	N/A	Upper West Terrace
53	image_00096.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user	N/A	Upper West Terrace
54	image_00097.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user	N/A	Trump Hotel
55	image_00098.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user	N/A	Trump Hotel
56	image_00099.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user	N/A	Approach to the northwest side of the Capitol
57	image_00102.jpeg	Photo from Facebook account of Dawn Munn – photos, Dawn sent to Facebook account of Kristi Munn	N/A	Metro Station
58	image_00108.jpeg	Photo from Facebook account of Dawn Munn – photos, Dawn sent to Facebook account of Kristi Munn	N/A	Unknown

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
59	image_00133.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Approach to Capitol from the northwest
60	image_00134.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Unknown
61	image_00135.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Approach to Capitol from the northwest
62	image_00136.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Approach to the Capitol from the northwest
63	image_00137.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Unknown
64	image_00138.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Approach to the Capitol from the northwest

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
65	image_00139.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Approach to the Capitol from the northwest
66	image_00140.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Approach to the Capitol from the northwest
67	image_00149.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn	N/A	West side of the Capitol - scaffolding
68	image_00150.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn	N/A	West side of the Capitol - scaffolding
69	image_00160.jpeg	Photo from Facebook account of Tom Munn posted	N/A	Unknown
70	image_00181.jpeg	Photo from Facebook account of Tom Munn	N/A	Unknown
71	image_00182.jpeg	Photo from Facebook account of Kayli Munn – Kayli sent to Facebook account of Tom Munn	N/A	Capitol grounds
72	image_00183.jpeg	Photo from Facebook account of Kayli Munn – Kayli sent to Facebook account of Tom Munn	N/A	Capitol grounds
73	image_00184.jpeg	Photo from Facebook account of Kayli Munn – Kayli sent to Facebook account of Tom Munn	N/A	Capitol grounds

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
74	image_00185.jpeg	Photo from Facebook account of Kayli Munn – Kayli sent to Facebook account of Tom Munn, Kayli Munn posted and commented on photo	N/A	Upper West Terrace
75	image_00186.jpeg	Photo from Facebook account of Kayli Munn – Kayli sent to Facebook account of Tom Munn	N/A	Upper West Terrace
76	image_00192.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn	N/A	Metro Train
77	image_00194.jpeg	Photo from Facebook account of Kristi Munn	N/A	Unknown
78	Image_00200.jpeg	Photo from Facebook account of Dawn Munn – sent to Facebook account of Kristi Munn	N/A	Unknown
79	image_00204.jpeg	Image from Facebook account of Dawn Munn – sent to Facebook account of Kristi Munn	N/A	East Rotunda Doors
80	image_00223.jpeg	Photo from Facebook account of Dawn Munn – sent to Facebook account of Kristi Munn	N/A	Unknown
81	image_00226.jpeg	Photo from Facebook account of Dawn Munn – sent to Facebook account of Kristi Munn	N/A	Unknown
82	image_00229.jpeg	Photo from Facebook account of Dawn Munn – sent to Facebook account of Kristi Munn	N/A	Metro Station

The Government does not object to the public release of any of the photos or videos on

this list.

Respectfully submitted,

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