

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA : Crim. No. 21-cr-00032 (DLF)  
 :  
 v. :  
 :  
 GUY WESLEY REFFITT, :  
 :  
 Defendant. :

**UNITED STATES’ RESPONSE TO DEFENDANT’S MOTION TO EXCLUDE  
CERTAIN LANGUAGE FROM CAPTIONS IN GOVERNMENT EXHIBIT 204**

The government, by and through its undersigned attorneys, hereby responds to the defendant’s Motion in Limine to Exclude Certain Language from Captions in Exhibit 204 (ECF 63). On October 22, 2021, the government provided the defense with its anticipated trial exhibits, including exhibit 204, which is a compilation of U.S. Capitol CCTV video clips taken on January 6, 2021. As a contextual aid, the exhibit included captions at the start of each video clip that sought to explain the portion of the riot shown in each clip.

On November 3, 2021, the Court issued a Minute Order ordering the defendant to file objections to the government’s exhibits by November 24, 2021. The defendant now has objected “to the inclusion of characterization” in exhibit 204: specifically, to the explanatory captions that were included at the start of each video clip in the exhibit, such as “Rioters Approach,” “Breach,” “Confrontation,” “Police Line,” and other similar captions. Mot. at 1. The defendant further explains that “he would not object to just time and location in the captions.” *Id.*

The government does not object to removing these explanatory captions, and instead including captions that only identify the video footage by time and location. The government will provide the defendant with a revised version of exhibit 204 prior to trial.

Wherefore, the government does not object removing the explanatory captions from

government exhibit 204.

Respectfully submitted,

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