

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

Plaintiff

v.

JOSEPH LINO PADILLA
also known as "Jose Padilla,"

Defendant.

Crim. No. 21-214 (JDB)
Hon. John D. Bates

DEFENDANT'S EXHIBIT LIST

DEFENDANT JOSEPH LINO PADILLA'S EXHIBIT LIST

NOW COMES Defendant Joseph Lino Padilla, by and through his attorney, Michael J. Cronkright, and Cronkright Law, PLLC and lists the following exhibits as potentially to be offered at trial:

1. Any and all video provided by the government as case specific discovery.
2. Any and all photographs provided by the government as case specific discovery.
3. Any and all social media content provided by the government, or which Defendant is able to obtain beyond the government disclosures.
4. Any and all investigative reports, summaries and transcripts provided by the government as case specific discovery.
5. Any and all exhibits listed in the Government's Exhibit List
6. Specifically, Defendant may seek introduction of the following compilations and excerpts of available video:
 - a. TRUMP SIGN VIDEOS SLIDESHOW
 - b. Big_Metal_Trump_Sign_hits_officer_line (Original)
 - c. Big Metal Trump Sign Hits Officer Line (Clip 1)
 - d. Big Metal Trump Sign Hits Officer Line (Clip 2)
 - e. Big Metal Trump Sign Hits Officer Line (Photo 1)
 - f. Big Metal Trump Sign Hits Officer Line (Photo 2)
 - g. Big Metal Trump Sign Hits Officer Line (Photo 3)
 - h. Big Metal Trump Sign Hits Officer Line (Photo 4)
 - i. Parler_sign_video_from_archive_org (Original)
 - j. Parler_sign_video_from_archive_org (Clip 1)

- k. Parler_sign_video_from_archive_org (Photo 1)
- l. slightlyoffensive youtube sign approaching (Original)
- m. slightlyoffensive youtube sign approaching (Clip 1)
- n. slightlyoffensive youtube sign approaching (Photo 1)
- o. VIDEO 3 sign approaches and push from behind dom and ed (Original)
- p. VIDEO 3 sign approaches and push from behind dom and ed (Clip 1)
- q. VIDEO 4 sign from front and side (Original)
- r. VIDEO 4 sign from front and side (Clip 2) Sign
- s. VIDEO 5 MPD Body cam sign with ed and dom (Original)
- t. VIDEO 5 MPD Body cam sign with ed and dom (Clip 2) – Sign
- u. View from behind sign push (Original)
- v. View from behind sign push (Clip 1)
- w. View from behind sign push (Photo 1)
- x. 176-WF-3366759-PADILLA Serial 14 – Divonnie Powell Flagpole Interview
- y. 176-WF-3366759-PADILLA Serial 12 – Lila Morris Flagpole Interview
- z. Email chain - Pole Interview Report - USCP Bruno Felberg Borges
- aa. 176-WF-3366759-PADILLA Serial 17 – Christopher Wilkerson Flagpole Interview
- bb. 02-01-21 Email from Christopher Wilkerson
- cc. 176-WF-3366759-PADILLA Serial 18 – David Callaghan
- dd. 176-WF-3366759-PADILLA Serial 28 – Michael C Garner & others Flagpole Interview
- ee. PADILLA throws pole
- ff. Flagpole Slideshow
- gg. Identification Photo 1
- hh. Identification Photo 2
- ii. CAP02_000010259 (Original)
- jj. CAP02_000010259 (Photo 1)
- kk. CAP02_000010264 (Original)
- ll. CAP02_000010264 (Photo 1)
- mm. CAP02_000010264 (Photo 2)

nn. CAP02_000010264 (Photo 3)

7. Defendant, through counsel, continues to seek access to video in the possession of the United States House of Representatives. Any such video, to the extent that it is deemed relevant to the defense, will result in an additional disclosure.
8. Defendant may seek to introduce the specific items that are alleged to have been used as dangerous weapons.

Respectfully submitted:

/s Michael Cronkright

Michael Cronkright (P52671)

Thursday, April 13, 2023

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Defendant's Exhibit List is being filed via the Electronic Court Filing System (ECF), causing a copy to be served upon government counsel of record, this

/s Michael Cronkright

Michael J Cronkright (P52671)
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Thursday, April 13, 2023