

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 AMENDED  
EXHIBIT LIST**

**DEFENDANT JOSEPH LINO PADILLA’S 4/30/23 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 photos:
  - a. Bruised Right Arm - 1
  - b. Bruised Right Arm – 2
  - c. Bruised Right Side of Head – 1
  - d. Swollen Face – 1
  - e. Swollen Face – 2
  - f. Swollen Left Hand – 1
  - g. Swollen Left Hand – 2
  - h. Swollen Left Hand – 3
  - i. Swollen Left Hand – 4
  - j. Swollen Right Hand – 1
  - k. Swollen Right Hand – 2

- l. Swollen Right Hand – 3
- m. Swollen Right Hand – 4
7. 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)
- oo. Aerial Overview clip
- pp. Beaten and Dazed 1 clip
- qq. Beaten and Dazed 2 clip
- rr. Notices Sign and Helps Woman 1clip
- ss. Notices Sign and Helps Woman 2 clip
- tt. Put it up here clip
- uu. Hands on Sign 1
- vv. Hands on Sign 2
- ww. Hands on Sign 3
- xx. Wheels stuck in Rack 1
- yy. Wheels stuck in Rack 2
- zz. ABQ - Anatomy of a Riot - YouTube at 23.18-23.32
- aaa. jroberson clip
- bbb. open source, YouTube\_DC 1\_6\_21\_\_12.06-12.18 stamp

8. 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.
9. Defendant may seek to introduce the specific items that are alleged to have been used as dangerous weapons.

Respectfully submitted:

*/s/ Michael J Cronkright*

Dated: \_\_\_\_\_

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