

FILED

MAY 01 2023

Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

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

JOSEPH LINO PADILLA
also known as "Jose Padilla,"

Defendant.

STIPULATION

The parties stipulate and agree to the following;

- A. The following law enforcement officers known to be in the proximity of "the tunnel" at the time that Mr. Padilla threw a flagpole were specifically interviewed in an attempt to determine whether they were struck by the flagpole or had any specific knowledge as to the identity of any officer who was struck by the flagpole.
1. Officer Lila Morris of the Metropolitan Police Department
 2. Officer Divonnie Powell of the Metropolitan Police Department
 3. Officer Christopher Wilkerson of the United States Capitol Police
 4. Officer David Callaghan of the United States Capitol Police
 5. Officer Ryan Campbell of the United States Capitol Police
 6. Officer Jonathan Collins of the United States Capitol Police
 7. Officer Dynasty Lancaster of the United States Capitol Police
 8. Officer Bruno Felberg Borges of the United States Capitol Police
 9. Officer Jithin Kaniyaly of the United States Capitol Police
 10. Officer Zhen Yuan of the United States Capitol Police
 11. Officer Michael Garner of the United States Capitol Police
- B. In summary, none of the officers listed *recalled being* struck by the *initial throw of the* flagpole or knew the identity of any officer so struck.



DOUGLAS B. BASHER *Brasher*
Assistant United States Attorney
Detailer Texas State Bar No. 21077601
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
(214) 659-8604
douglas.basher@usdoj.gov

Dated: 5-1-23



ANDREW S. HAAG
Assistant United States Attorney
MA Bar No. 705425
601 D Street, N.W.
Washington, DC 20530
(202) 252-7755
Andrew.Haag@usdoj.gov

Dated: May 1, 2023



Michael J Cronkright (P52671)
Attorney For Joseph Lino Padilla
Cronkright Law, PLLC
4601 W. Saginaw, Ste J2A
Lansing, MI 48911
(517) 719-4401
Michael@cronkrightlaw.com

Dated: April 29, 2023