

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : CASE NO. 21-CR-382 (PLF)
 :
 CHRISTOPHER WARNAGIRIS, :
 :
 Defendant. :

GOVERNMENT OBJECTIONS TO DEFENSE EXHIBITS

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits to the Court a list of the objections to Defendant Warnagiris’ exhibits. The government reserves the right, at trial, to object to any Defense exhibit if the proper relevancy or authentication is not laid. The government specially objects to the admissibility following exhibits:

Defense Exhibit 56

The government objects to Defense Exhibit 56. Defense Exhibit 56 is a Statement of Facts from a separate January 6th case. This exhibit is not relevant under F.R.E. 403 and is inadmissible hearsay under F.R.E. 801.

Defense Exhibit 57

The government objects to Defense Exhibit 57. Defense Exhibit 57 is a Statement of Facts from a separate January 6th case. This exhibit is not relevant under F.R.E. 403 and is inadmissible hearsay under F.R.E. 803.

Defense Exhibit 58

The government objects to Defense Exhibit 58 in its current form. Defense Exhibit 58 is a screen shot of a desktop including a still image of CCTV. The government asks that the exhibit be redacted/cropped to remove non-relevant material in the boarder of the screen shot.

Defense Exhibit 55

The government objects to Defense Exhibit 55, in its current form, being admitted during trial. This demonstrative exhibit is testimonial as it identifies persons by name and provides transcriptions of statements that will need identification by an in-court witness. To the extent a version without the labeling and transcription is offered, the government will not object, so long as each supporting video is identified, properly authenticated, and admitted into evidence.

Respectfully submitted,

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