

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

No. 1:21-cr-38-CRC

**RICHARD BARNETT
also known as “Bigo Barnett,”**

United States’ Objections to Defendant’s Exhibits

On December 19, 2022, the parties timely exchanged exhibit lists pursuant to the Court’s pretrial order. Along with its exhibit list, the United States provided the defendant with copies of the government’s actual exhibits. The defendant did not reciprocate. The United States promptly conferred with defense counsel and requested the defense exhibits.

The parties’ objections to each other’s exhibits are due today, but the defense has still not provided the United States with its exhibits. The United States is unable to determine from the defendant’s exhibits’ names alone what items the defendant seeks to introduce. *See Ex. A.* The United States must object to the admission of any defense exhibit that it has not had the opportunity to review, and therefore objects to all of the exhibits on the defendant’s exhibit list.¹

¹ The United States anticipates that once it has the opportunity to review the defendant’s proposed exhibits, the United States will likely withdraw its objection to many of them. For example, based on the structure and content of the exhibit names, it appears that the defendant’s exhibit list likely includes, among other things, video footage from January 6, 2021, captured by U.S. Capitol building surveillance cameras (CCTV) and body worn cameras (BWC) used by members of the Metropolitan Police Department. As a general matter, the United States does not anticipate that it will object to such exhibits. Nevertheless, the United States still must have the opportunity to review all of the defendant’s exhibits prior to trial to determine whether it has any objections.

Respectfully submitted,

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United States Attorney

/s/ Alison B. Prout

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