

**FILED**

**APR - 7 2023**

Clerk, U.S. District and  
Bankruptcy Courts

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

**UNITED STATES OF AMERICA** :

**v.** :

**KEVIN JAMES LYONS,** :

**Defendant.** :

**Case No.: 21-CR-79 (BAH)**

**UNITED STATES' EXHIBIT LIST**

The United States has identified the following exhibits to be used at the Stipulated Trial.


<b>Exhibit No.</b>	<b>Description / Timestamp of Defendant's Appearance</b>	<b>Length</b>
1	Screenshot of a post on Defendant's Instagram profile dated January 5, 2021. Post depicts the Defendant's projected driving route from Chicago to Washington, D.C. Captioned "Stop the Steal!"	n/a
2	Photograph taken from open source materials showing Defendant's dress and appearance on January 6, 2021.	n/a
3	Cell phone video taken by the Defendant and recovered from his phone. Shows the Defendant approaching the West Front of the Capitol and moving through the crowd. Defendant states "We're getting gassed and flashbanged" and "I love the smell of teargas in the mid-afternoon." Defendant can be heard speaking throughout the entire video.	1:23
4	Cell phone video taken by the Defendant and recovered from his phone. Shows the Defendant climbing the Northwest Steps of the Capitol, stating "we're stoming the Capitol Building," and yelling at law enforcement officers. Defendant can be heard speaking throughout the entire video.	1:16
5	Cell phone video taken by the Defendant and recovered from his phone. Shows the Defendant walking through the Northwest Courtyard, calling law enforcement officers "oathbreakers," approaching and passing through the Senate Wing Door, and high fiving another rioter. Defendant can be heard speaking throughout the entire video.	2:29
6	Capitol CCV video showing Defendant walking through the Senate Wing Door at 2:20pm, holding his phone in his hand, and high fiving another rioter. Defendant appears between 00:13 and 00:18.	1:01
7	Cell phone video taken by the Defendant and recovered from his phone. Shows Defendant walking through the Crypt yelling "Nancy, where are you?" Defendant can be heard speaking throughout the entire video.	0:26

EXHIBITS  
ADMITTED  
ON  
4/7/2023



Exhibit No.	Description / Timestamp of Defendant's Appearance	Length
8	Cell phone video taken by the Defendant and recovered from his phone. Shows the Defendant approaching the House Speaker's Office Suite, calling the Speaker's name, entering the Suite, introducing himself to another rioter, filming himself in a mirror, and taking a staffer's wallet from a coat. Defendant can be heard speaking throughout the entire video, but the most probative portion is 05:55 through 9:45.	9:52
9	Cell phone video taken by the Defendant and recovered from his phone. Shows the Defendant walking through the Rotunda. Between 0:45 and 0:49, the Defendant can be heard informing another rioter that "we've been [to Speaker Pelosi's Office]."	0:49
10	Photograph of the Defendant holding up to his face a framed photograph of Speaker Nancy Pelosi and the late-Representative John Lewis. The photograph was submitted to the FBI in connection with its investigation into the events of January 6, 2021.	n/a
11a	Photograph taken by the Defendant and recovered from his phone. The photograph depicts the framed photograph described in Exhibit 10 and was sent with Exhibit 11b.	n/a
11b	Text messaged recovered from the Defendant's phone. In the message, the Defendant stated "I took this off Pelosi's fucking desk!! We fucking did it!!" Message was sent with Exhibit 11a.	n/a

ADMITTED  
ON 4/7/2023



\* \* \*

Respectfully submitted,  
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DC Bar No. 481052

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