

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

**UNITED STATES OF AMERICA**

v.

**LARRY BROCK,**

Defendant.

Case No. 21-cr-140 (JDB)

**GOVERNMENT’S RESPONSE IN OPPOSITION TO  
DEFENDANT’S MOTION TO CONTINUE SENTENCING**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully opposes Defendant Larry Brock’s (Brock) March 10, 2023, motion to continue sentencing in this case. ECF 87 For the reasons stated below, this motion should be denied.

Brock moves to continue the sentencing scheduled in this case for March 17, 2023, to an indeterminate future date. *See* ECF 87 Brock’s motion to continue relies on the unfounded claims that (1) Tucker Carlson’s show aired footage from the U.S. Capitol on January 6, 2021 of Jacob Chansley (*U.S. v Chansley*, 1:21-CR-3-RCL), stating that Chansley’s counsel was not provided with that footage (and thus there might be footage of Brock as well); and (2) that a motion was filed in the *Pezzola* case (*U.S. v. Pezzola*, 1:21-CR-175-TJK) on March 9, 2023 stating that federal agents improperly accessed attorney-client communications, destroyed evidence, and altered evidence (and thus this might have happened to Brock as well)<sup>1</sup>. ECF 87, p. 1-2. Brock does not allege that he believes that this occurred in this particular case.

---

<sup>1</sup> The Government responded to the motions in the *Pezzola* case (1:21-CR-175-TJK, *See* ECF 687 and 689), which also addressed the Tucker Carlson footage, on March 12, 2023. The Government noted that the Tucker Carlson footage only provided a small snippet of Chansley’s time inside the Capitol on January 6, and that all the footage (save 10 seconds of which involved an evacuation route) was provided in global discovery by September 24, 2021. The Government further noted that the claims that FBI Agents had altered or destroyed evidence were not accurate.

The riot at the United States Capitol on January 6, 2021, was an unprecedented event in the history of the United States. As such, it had led to an unprecedented amount of evidence. However, that evidence has been made available to January 6 defendants, including Brock.

The United States has provided voluminous discovery in this case. As of March 6, 2023, over 4.91 million files (7.36 terabytes of information) have been provided to the defense Relativity workspace. These files include (but are not limited to) the results of searches of 759 digital devices and 412 Stored Communication Act accounts; 5,254 FBI FD-302s and related attachments (FD-302s generally consist of memoranda of interviews and other investigative steps); 395 digital recordings of subject interviews; and 149,130 (redacted or anonymous) tips. Over 30,000 files that include body-worn and hand-held camera footage from five law enforcement agencies and surveillance-camera footage from three law enforcement agencies have been shared to the defense evidence.com video repositories. *All* of this information is accessible to the defense, as well as camera maps and additional tools that assist any defense counsel with conducting their own searches for information that they might believe is relevant. While discovery in this case is voluminous, the government has provided defense counsel with the necessary tools to readily identify relevant cameras within the U.S. Capitol Police closed-circuit television (“CCTV”) to determine whether footage was produced or not. Subject to some exclusions, such as evacuation footage and cameras depicting certain sensitive areas, the Defendant, like all January 6 defendants, has long had access to nearly all exterior U.S. Capitol Police (“USCP”) camera footage, interior Capitol footage, Capitol Visitor Center footage from January 6 from noon to 8 p.m., and his counsel has been provided maps generally depicting the location of CCTV cameras.

In Brock’s specific case, over 30 videos were turned over between January 2021 through November 2022 that were specific to his case. Some of these videos were turned over as a result of an additional trace search completed shortly before trial. Other discovery, including reports, photographs,

