

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-162(2) - BAH
	:	
TERRY LYNN LINDSEY,	:	
	:	
Defendant.	:	

**UNITED STATES' EXHIBIT LIST
AND REQUEST FOR SCHEDULING ORDER**

At this time, the United States has identified the following exhibits it intends to use at trial. This exhibit list was compiled in a good-faith effort to identify all trial evidence that is known or identified at this time. The government reserves the right to supplement this list or to remove items from the list, as it develops additional evidence throughout trial preparations and to streamline the presentation of its case. The government also reserves the right to introduce any evidence produced to the defense in discovery.

At this time, although the government has requested reciprocal discovery, the defense has not provided any discovery materials to the government. To streamline the presentation of evidence at trial, the government requests that the defense be ordered to produce all reciprocal discovery by March 28, 2022. The government further requests that the parties exchange witness lists and marked exhibits by April 4, 2022. For all witnesses the defense identifies, the government requests that the defense provide the witness's name, age, and social security number, to allow the government to run a criminal background check for each witness.

The government's anticipated exhibits are as follows:

<u>No.</u>	<u>Description</u>	<u>File Name or Bates Number</u>	<u>Admitted?</u>	<u>Date</u>
<i>Legal and Congressional Public Records</i>				
	U.S. Constitution – 12th Amd.			
	3 U.S. Code § 15			
	3 U.S. Code § 16			
	3 U.S. Code § 17			
	3 U.S. Code § 18			
	Congressional Record – Senate			
	Congressional Record – House			
	Senate Concurrent Resolution 1 (Jan. 3, 2021)			
	Screenshots from Senate chamber video at 1:39pm, 1:48pm, 1:54pm, 2:00pm, 2:05pm, 2:10pm			
	Screenshots from House chamber video at 1:43pm, 1:48pm, 1:54pm, 1:59pm, 2:04pm, 2:10pm, 2:14pm			
	Secret Service Head of State Notification Worksheet			
	Mayor Bowser Curfew Order (Mayor’s Order 2021-002)			
	Video Montage – including Congressional Record (vol. 167, No. 4) at S13, S14, S18, H75, H76, H84, H85 and video footage from House and Senate			
<i>Stipulations, Maps, and Other Background Materials</i>				
	Omnibus Stipulation of the Parties			
	Overview Map of Capitol Building			
	Diagram of Capitol Building			
	Overview Map of Restricted Area			
	Long View of West Front of Capitol			
	Close Up of Lower West Terrace			
	Affidavit Regarding Secret Service Protection			

<i>Evidence Relating to Lindsey and Croy</i>				
	Cellebrite Report – Scoped Cell Phone Extraction (full)	266T-CI-3372221-0000038_00000001		
	Facebook Warrant Return – Scoped Results (full)	266T-CI-3372221-0000042_1A0000025_000005 and 27		
	Business Record Affidavit – Facebook Report			
	Plotted map of Piqua, Ohio to Washington, DC			
	Facebook messages regarding travel to D.C.	266T-CI-3372221-0000042_1A0000025_000005 at 108-11		
	Facebook messages regarding travel to D.C.	266T-CI-3372221-0000042_1A0000025_000005 at 88-89		
	Facebook messages regarding travel to D.C.	266T-CI-3372221-0000042_1A0000025_000005 at 102-03		
	Facebook messages regarding arrival in D.C. area	266T-CI-3372221-0000042_1A0000025_0000027 at 24		
	Facebook messages regarding travel to rally	266T-CI-3372221-0000042_1A0000025_0000027 at 26-31		
	Picture taken at rally	266T-CI-3372221-0000042_1A0000025_000005 at 58		
	Facebook Messages on the way to Capitol	266T-CI-3372221-0000042_1A0000025_000027 at 48-53		
	Photo on the way to Capitol	266T-CI-3372221-0000042_1A0000025000001		
	Facebook messages on the way to Capitol, regarding “flashbanging”	266T-CI-3372221-0000042_1A0000025_0000027 at 48-54		
	Photo of stairs to Lower West Terrace	266T-CI-3372221-0000042_1A0000025_00002		
	Photo of stairs to Lower West Terrace	266T-CI-3372221-0000042_1A0000025_000020		
	Photo of Lindsey from near stairs to Lower West Terrace, 1:46 pm	20210106_170344.jpg		

Cell Phone Video Taken by Glenn Wes Lee Croy on January 6, 2021	20210106_133313.mp4		
Cell Phone Video Taken by Glenn Wes Lee Croy on January 6, 2021	20210106_134332.mp4		
Cell Phone Video Taken by Glenn Wes Lee Croy on January 6, 2021	20210106_134832.mp4		
Cell Phone Video Taken by Glenn Wes Lee Croy on January 6, 2021	20210106_135713.mp4		
Hat Recovered During Residence Search	Item 1B4		
Open-source video, stairs to Lower West Terrace	https://www.youtube.com/watch?v=8Vh8wPeo6Jk&t=343s		
Bodyworn Camera Footage, Captiol Grounds, 2:00 pm	vlc-record-2021-10-14-13h49m08s-20210106-_Felony_Riots-_First_St_SE.mp4-.mp4 Timestamp: 2:27		
Bodyworn Camera Footage, Capitol Grounds, 2:00 pm	vlc-record-2021-10-14-13h43m32s-20210106_-_Rioting_-_United_States_Capitol_Building.mp4-.mp4 Timestamp: 2:28		
Cell Phone Video Taken by Glenn Wes Lee Croy on January 6, 2021	20210106_140017.mp4		
Facebook Message from Lindsey, 2:03 pm	266T-CI-3372221-0000042_1A0000025_0000027		
Photo of Lindsey, Lower West Terrace, 2:12 pm	Image\1609960340773.jpg		
Open-Source Video – Initial Entry into Senate Wing Door (Outside Perspective)	https://www.youtube.com/watch?v=270F8s5TEKY		
Open-Source Video – Initial Entry into Senate Wing Door (Outside Perspective)	https://www.youtube.com/watch?v=jWJVMoe7OY0		
CCTV Video – Initial Entry and Lindsey Entry to Senate Wing Door, 2:13 pm, 2:18 pm	0102 USCS 01 Senate Wing Door near S139 - 2021-01-06_19h11min04s.mp4		

		Timestamp: :55-3:00, 7:21-8:00		
	Facebook messages regarding entry into Capitol Building	266T-CI-3372221-0000042_1A0000025_0000027 at 54-55, 58, 63		
	Facebook messages regarding entry into Capitol Building	266T-CI-3372221-0000042_1A0000025_0000005 at 96-99, 105		
	Photo of Lindsey Inside Capitol Building, 2:19 pm	Ex. 2, Image\20210106_141919.jpg		
	Photo of Lindsey Inside Capitol Building	266T-CI-3372221-0000042_1A0000025_0000011		
	Parler Video of Lindsey Inside Capitol Building	266T-CI-3372221-0000042_1A0000025_000009 import		
	Photo of Lindsey and Croy in Front of Lincoln Statue	266T-CI-3372221-0000042_1A0000025_0000017		
	Cell Phone Video Taken by Glenn Wes Lee Croy on January 6, 2021	20210106_142055.mp4		
	Cell Phone Video Taken by Glenn Wes Lee Croy on January 6, 2021	20210106_143443.mp4		
	CCTV, Crypt North, 2:25 pm	0402 USCH 01 Crypt North - 2021-01-06_19h17min43s.mp4 Timestamp: 3:29		
	CCTV, House Wing Door, 2:29 pm	0153 USCH 01 House Wing Door - 2021-01-06_19h20min01s Timestamp: 9:23		
	CCTV, Memorial Door, 2:34 pm	0171 USCH 01 Memorial Door - 2021-01-06_19h31min24s.mp4 Timestamp: 2:30 – 4:30		
	CCTV, Memorial Door Exit, 2:37 pm	0180 USCH 01 Memorial Door Exterior - 2021-01-06_19h20min01s.mp4 Timestamp: 17:35		
	CCTV, Southeast Courtyard, 2:37 pm – 2:59 pm	0949 USCH RF Southeast Roof - 2021-01-06_19h20min01s.mp4 Timestamp: 17:45		

	Picture Taken By Lindsey – Outside, 3:00 pm	266T-CI-3372221-0000042_1A0000025_0000007		
	Cell Phone Video Taken by Glenn Wes Lee Croy on January 6, 2021	20210106_151918.mp4		
	CCTV, Rotunda Door, 3:21 pm	7029 USCS 02 Rotunda Door 2021-01-06 20h20min39s.mp4 Timestamp: 0:46		
	Facebook Message By Lindsey Regarding Reentry	266T-CI-3372221-0000042_1A0000025_0000027 at 70		
	CCTV, Rotunda, 3:25 pm	0959 USC 02 Rotunda South - 2021-01-06_20h19min16s.mp4 Timestamp: 7:44, 7:49		
	CCTV, Memorial Door, 3:28 pm	0171 USCH 01 Memorial Door - 2021-01-06_20h21min55s.mp4 Timestamp: 6:50		
	CCTV, Memorial Door Exterior, 3:29 pm	0180 USCH 01 Memorial Door Exterior - 2021-01-06_20h20min01s.mp4 Timestamp: 9:11		
	Photo of Capitol Building Taken by Lindsey, 5:03 pm	266T-CI-3372221-0000042_1A0000021		
	Facebook Messages Regarding Entry into Capitol Building	266T-CI-3372221-0000042_1A0000025_0000027 at 23, 28, 37, 72-83, 101		
	Geofence Report	266T-CI-3372221-0000026_1A0000002		
	Written Waiver of <i>Miranda</i> Rights – Terry Lynn Lindsey			
	Video Recording of Interview of Terry Lynn Lindsey	266T-CI-3372221-0000019_1A0000008		