

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-429-CRC
	:	
SAVANNAH DANIELLE MCDONALD,	:	
	:	
Defendant.	:	

GOVERNMENT’S NOTICE OF FILING OF VIDEOS
PURUSANT TO LOCAL CRIMINAL RULE 49

The United States of America, through the undersigned, hereby gives this notice pursuant to Local Criminal Rule 49, of the following videos that were provided to the Court and defense counsel on May 3, 2022, via USAfx, relating to the sentencing hearing scheduled for May 10, 2022. As video clips, they are not in a format that readily permits electronic filing on CM/ECF.

The videos are as follows:

1. A file entitled Exhibit 2, which is a video collected from co-defendant Nolan Kidd’s (“Kidd”) mobile telephone, shows the assault of police officers on the Upper West Terrace Staircase of the United States Capitol. In particular, the video shows rioters pushing past the police line while Savannah Danielle McDonald (“McDonald”) yells “we are making history.”

2. A file entitled “Exhibit 3,” which is a video taken by the United States Capitol Police (USCP) Closed Circuit Video (CCV) system starting at 2:08:57 p.m., shows the assault of police officers on the Upper West Terrace Staircase of the United States Capitol. In particular, the video shows rioters pelting officers with various objects and pushing through the police line at 0:48. The video also shows McDonald across that line at 5:01.

3. A file entitled “Exhibit 4,” which is a video collected from Kidd’s mobile telephone, shows McDonald as she climbs the Upper West Terrace Staircase of the United States Capitol.

4. A file entitled “Exhibit 5,” which is a video collected from Kidd’s mobile telephone, shows rioters entering through the Senate Wing Door of the United States Capitol. In the video Kidd says to McDonald, “they broke all the way through the door... they’re goin’ in, look ... you want to.”

5. A file entitled “Exhibit 7,” which is a video taken by the USCP CCV system starting at 2:11:58 p.m., shows rioters breaking into the Capitol Building through the Senate Wing Door as well as McDonald approaching that entrance at 3:18 in the video.

6. A file entitled “Exhibit 8,” which is a video taken by the USCP CCV system starting at 2:14:58 pm, shows rioters forcing open the Senate Fire Door from the inside at approximately 1:02 in the video and McDonald entering the Capitol at approximately 1:16 in the video.

7. A file entitled “Exhibit 9,” which is a video collected from Kidd’s mobile telephone, depicts the scene from inside the Capitol as Kidd states, “this is the place very few Americans ever get to see, we broke in, we own this building, this is our house, they can tear gas us all they want, we own it.”

8. A file entitled “Exhibit 10,” which is a video collected from Kidd’s mobile telephone, shows officers directing rioters to exit through the Senate Carriage Door.

9. A file entitled “Exhibit 11,” which is a video taken by the USCP CCV system starting at 2:16:59 pm, shows officers directing rioters to exit through the Senate Carriage Door and shows McDonald turning around at 0:57 in the video.

10. A file entitled “Exhibit 12,” which is a video taken by the USCP CCV system starting at 2:19:59 pm, shows an officer on the third floor of the Capitol directing McDonald to leave at 0:20 in the video.

11. A file entitled “Exhibit 14,” which is a video collected from Kidd’s mobile telephone, captures McDonald in a Senate hallway saying she had been tear gassed three times.

12. A file entitled “Exhibit 15,” which is a video collected from Kidd’s mobile telephone, captures McDonald and Kidd bragging that McDonald was “the only girl who made it into the Senate.”

If the Court accepts these proposed video exhibits into evidence, the United States takes the position that the entered exhibits should be released to the public.

Respectfully submitted,

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