

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

UNITED STATES OF AMERICA :
 :
 v. : **No. 21-CR-453 (JDB)**
 :
SEAN MICHAEL MCHUGH :
 :
 Defendant. :

**NOTICE OF FILING OF VIDEO
PURSUANT TO LOCAL CRIMINAL RULE 49**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby notifies the Court of the submission of video exhibits in support of the United States’ Opposition to Defendant’s Second Omnibus Motion In *Limine* (ECF No. 101). As video clips, they are not in a format that readily permits electronic filing on CM/ECF. Video exhibits have been submitted to the Court and made available to defense counsel via the government’s file-sharing site, USAfx. Each exhibit is identified and briefly described below. The video footage was recorded by officers of the Metropolitan Police Department (“MPD”) using their individual body-worn camera on January 6, 2021 at the U.S. Capitol, Lower West Plaza.

- Exhibit 1: MPD body-worn camera video, BWC DC(4), video recording of McHugh on lower West Plaza of U.S. Capitol (approximately 1 minute, 20 seconds);
- Exhibit 2: MPD body-worn camera video, BWC DC(3), video recording of McHugh on lower West Plaza of U.S. Capitol (approximately 1 minute, 2 seconds);
- Exhibit 3: MPD body-worn camera video, BWC DC(8), video recording of McHugh on lower West Plaza of U.S. Capitol (approximately 33 seconds);
- Exhibit 4: MPD body-worn camera video, BWC DC(4), video recording of McHugh on lower West Plaza of U.S. Capitol (approximately 4 minutes, 9 seconds);
- Exhibit 5: MPD body-worn camera video, BWC DC(4), video recording of McHugh on lower West Plaza of U.S. Capitol (approximately 41 seconds);

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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