

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

UNITED STATES OF AMERICA

v.

**KRISTI MUNN,
THOMAS MUNN,
DAWN MUNN,
JOSHUA MUNN,
KAYLI MUNN,**

Defendants.

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Criminal No. 1:21-cr-474

Honorable Chief Judge Beryl A. Howell

**UNITED STATES' REPORT AND POSITION REGARDING PUBLIC
RELEASE OF PHOTO AND VIDEO EVIDENCE RE: THE MUNN DEFENDANTS**

The United States will make the following video and photo evidence available to the Court electronically in preparation for the plea hearings and sentencings of the defendants in the above referenced matter:

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
1	20210106-FELONYRIOTIN G-CAPITAL_BUILDING.mp4_clip_1633_1656	MPD BWC	00:23	Upper West Terrace
2	USCH 01 Crypt East - 2021-01-06_19h20min01s.mp4_clip_588_639 HIGHLY SENSITIVE.mp4	Capitol Police	00:51	Crypt East

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
3	USCH 01 Memorial Door - 2021-01-06_19h31min24s.mp4_clip_865_910 HIGHLY SENSITIVE	Capitol Police	00:45	Memorial Door
4	USCS 01 Crypt Lobby East - 2021-01-06_19h19min01s.mp4_clip_690_738 HIGHLY SENSITIVE	Capitol Police	00:47	Crypt Lobby East
5	USCS01SenateWingDoorNearS139_2021-01-06_14h20min18s087ms.mp4_clip_294_326 HIGHLY SENSITIVE.mp4	Capitol Police	00:32	Senate Wing Doors
6	USCS01SenateWingDoorNearS139_2021-01-06_15h13min58s920ms.mp4_clip_155_211 HIGHLY SENSITIVE.mp4	Capitol Police	00:56	Senate Wing Doors
7	USCS 01 Crypt Lobby East - 2021-01-06_19h31min20s.mp4_clip_0_309 HIGHLY SENSITIVE.mp4	Capitol Police	5:09	Crypt Lobby East

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
8	1610059213.11-df96bf84f5d9dc7d1049ef578c2a010bd101e19a-file-0_1of1_TRUMP RALLY DC DLive - sHgZco-GR.mp4_clip_1312_1550.mp4	DLive	3:58	Senate Wing, Room S-145
9	image_00000.jpeg	Image from Facebook account of Tom Munn – private message to Josh Munn	N/A	N/A
10	image_00001.jpeg	Image from Facebook account of Tom Munn – private message	N/A	N/A
11	image_00002.jpeg	Image from Facebook account of Tom Munn – comment on photo	N/A	N/A
12	image_00003.jpeg	Image from Facebook account of Tom Munn - photo	N/A	N/A
13	image_00004.jpeg	Image from Facebook account of Tom Munn - photo	N/A	N/A
14	image_00005.jpeg	Image from Facebook account of Tom Munn - photo	N/A	N/A
15	image_00006.jpeg	Image from Facebook account of Tom Munn - photo	N/A	N/A
16	image_00007.jpeg	Image from Facebook account of Tom Munn - status	N/A	N/A
17	image_00008.jpeg	Image from Facebook account of Dawn Munn - status	N/A	N/A

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
18	image_00009.jpeg	Image from Facebook account of Tom Munn - photo	N/A	N/A
19	image_00010.jpeg	Image from Facebook account of Tom Munn – status, photo, private message	N/A	N/A
20	image_00011.jpeg	Image from Facebook account of Tom Munn – status, photo, private message	N/A	N/A
21	image_00020.jpeg	Image from Facebook account of Dawn Munn - photo	N/A	N/A
22	image_00021.jpeg	Image from Facebook account of Tom Munn – private messages, photo	N/A	N/A
23	image_00022.jpeg	Image from Facebook account of Tom Munn – private messages, photo, status	N/A	N/A
24	image_00023.jpeg	Image from Facebook account of Dawn Munn - photo	N/A	N/A
25	image_00024.jpeg	Image from Facebook account of Dawn Munn – status and photo	N/A	N/A
26	Image_00026.jpeg	Image from Facebook account of Tom Munn – private message	N/A	N/A
27	Image_00027.jpeg	Image from Facebook account of Tom Munn – private messages	N/A	N/A
28	image_00028.jpeg	Image from Facebook account of Tom Munn – sent by Tom Munn to multiple FB user	N/A	N/A
29	image_00030.jpeg	Image from Facebook account of Tom Munn	N/A	N/A

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
30	image_00037.jpeg	Image from Facebook account of Tom Munn - photo	N/A	N/A
31	image_00053.jpeg	Photo from Facebook account of Minor Child-1 to Facebook account of Tom Munn	N/A	Unknown road
32	image_00059.jpeg	Photo from Facebook account of Dawn Munn – photos, Dawn sent to Facebook account of Kristi Munn	N/A	Hotel room
33	image_00060.jpeg	Photo from Facebook account of Dawn Munn – photos, Dawn sent to Facebook account of Kristi Munn	N/A	Hotel room
34	image_00061.jpeg	Photo from Facebook account of Dawn Munn – in Dawn’s photos, Dawn sent to Facebook account of Kristi Munn, Dawn posted as a status, Kelsi Munn posted	N/A	Hotel room
35	image_00062.jpeg	Photo from Facebook account of Dawn Munn – photos, Dawn sent to Facebook account of Kristi Munn	N/A	Unknown
36	image_00063.jpeg	Photo from Facebook account of Dawn Munn – photos, Dawn sent to Facebook account of Kristi Munn	N/A	Hotel room
37	image_00064.jpeg	Photo from Facebook account of Dawn Munn – photos, Dawn sent to Facebook account of Kristi Munn	N/A	Hotel room

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
38	image_00066.jpeg	Photo from Facebook account of Kristi Munn – photos	N/A	Unknown
39	image_00067.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Dawn Munn	N/A	Unknown
40	image_00068.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Dawn Munn	N/A	Unknown
41	image_00069.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Dawn Munn	N/A	Unknown
42	image_00070.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Dawn Munn	N/A	Unknown
43	image_00071.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Dawn Munn	N/A	Unknown
44	image_00072.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Dawn Munn	N/A	Unknown
45	image_00073.jpeg	Photo from Facebook account of Kristi Munn sent to another Facebook user	N/A	Unknown

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
46	image_00074.jpeg	Photo from Facebook account of Dawn Munn sent to five different Facebook users, sent to Facebook accounts of Tom Munn and Kristi Munn, Dawn commented and posted on status, Tom commented, Kelsi posted on her own Facebook account	N/A	Unknown
47	image_00081.jpeg	Photo from Facebook account of Dawn Munn – Dawn sent to Facebook account of Kristi Munn, Dawn commented and posted on status, Dawn sent to another Facebook user, Kelsi Munn posted on her own Facebook account	N/A	Unknown
48	image_00086.jpeg	Photo from Facebook account of Dawn Munn – Dawn sent to Facebook account of Kristi Munn, posted photo and sent to two Facebook users	N/A	Unknown
49	image_00092.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user	N/A	Approach to the northwest side of the Capitol
50	image_00093.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user	N/A	View to west from Capitol
51	image_00094.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user	N/A	View to west from Capitol

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
52	image_00095.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user	N/A	Upper West Terrace
53	image_00096.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user	N/A	Upper West Terrace
54	image_00097.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user	N/A	Trump Hotel
55	image_00098.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user	N/A	Trump Hotel
56	image_00099.jpeg	Photo from Facebook account of Josh Munn – sent to Facebook account of Kelsi Munn and another Facebook user	N/A	Approach to the northwest side of the Capitol
57	image_00102.jpeg	Photo from Facebook account of Dawn Munn – photos, Dawn sent to Facebook account of Kristi Munn	N/A	Metro Station
58	image_00108.jpeg	Photo from Facebook account of Dawn Munn – photos, Dawn sent to Facebook account of Kristi Munn	N/A	Unknown

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
59	image_00133.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Approach to Capitol from the northwest
60	image_00134.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Unknown
61	image_00135.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Approach to Capitol from the northwest
62	image_00136.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Approach to the Capitol from the northwest
63	image_00137.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Unknown
64	image_00138.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Approach to the Capitol from the northwest

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
65	image_00139.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Approach to the Capitol from the northwest
66	image_00140.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn, Tom posted and sent to another Facebook user	N/A	Approach to the Capitol from the northwest
67	image_00149.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn	N/A	West side of the Capitol - scaffolding
68	image_00150.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn	N/A	West side of the Capitol - scaffolding
69	image_00160.jpeg	Photo from Facebook account of Tom Munn posted	N/A	Unknown
70	image_00181.jpeg	Photo from Facebook account of Tom Munn	N/A	Unknown
71	image_00182.jpeg	Photo from Facebook account of Kayli Munn – Kayli sent to Facebook account of Tom Munn	N/A	Capitol grounds
72	image_00183.jpeg	Photo from Facebook account of Kayli Munn – Kayli sent to Facebook account of Tom Munn	N/A	Capitol grounds
73	image_00184.jpeg	Photo from Facebook account of Kayli Munn – Kayli sent to Facebook account of Tom Munn	N/A	Capitol grounds

#	File Name	Source	Length and Relevant Portion If Applicable	Location Depicted
74	image_00185.jpeg	Photo from Facebook account of Kayli Munn – Kayli sent to Facebook account of Tom Munn, Kayli Munn posted and commented on photo	N/A	Upper West Terrace
75	image_00186.jpeg	Photo from Facebook account of Kayli Munn – Kayli sent to Facebook account of Tom Munn	N/A	Upper West Terrace
76	image_00192.jpeg	Photo from Facebook account of Kristi Munn – Kristi sent to Facebook account of Tom Munn	N/A	Metro Train
77	image_00194.jpeg	Photo from Facebook account of Kristi Munn	N/A	Unknown
78	Image_00200.jpeg	Photo from Facebook account of Dawn Munn – sent to Facebook account of Kristi Munn	N/A	Unknown
79	image_00204.jpeg	Image from Facebook account of Dawn Munn – sent to Facebook account of Kristi Munn	N/A	East Rotunda Doors
80	image_00223.jpeg	Photo from Facebook account of Dawn Munn – sent to Facebook account of Kristi Munn	N/A	Unknown
81	image_00226.jpeg	Photo from Facebook account of Dawn Munn – sent to Facebook account of Kristi Munn	N/A	Unknown
82	image_00229.jpeg	Photo from Facebook account of Dawn Munn – sent to Facebook account of Kristi Munn	N/A	Metro Station

The Government does not object to the public release of any of the photos or videos on

this list.

Respectfully submitted,

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