

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Criminal Case No.</b>
	:	
<b>KENNETH JOSEPH OWEN THOMAS,</b>	:	<b>1:21-cr-00552 (CRC)</b>
	:	
<b>Defendant</b>	:	

---

**DEFENDANT KENNETH THOMAS’ OBJECTIONS TO GOVERNMENT’S PROPOSED EXHIBITS**

Defendant KENNETH JOSEPH OWEN THOMAS (“Thomas”), through the undersigned counsel, John L.

Pierce, Esq. presents the following objections to the Government’s proposed exhibits.

**I. GOVERNMENT'S PROPOSED EXHIBITS**

<p style="text-align: center;"><u><b>USA v. THOMAS</b></u>  <b>21-cr-00552 (DLF)</b>  Govt Exhibit List - May 9, 2023</p>				
<b>Govt Ex. No.</b>	<b>Description of Exhibit</b>	<b>Marked for I.D.</b>	<b>Received in Evidence</b>	<b>Witness</b>
<b>100 Series</b>	<b>Government / Safeway Records</b>	FRE 401, 403		
101	Senate Cong Rcd.pdf			
102	House Cong Rcd.pdf			
103	Cong-4 - Video Montage with Congressional Record.mp4			
104	20.14 Closure of West Front			
105	Restricted Perimeter.png	FRE 403	Misleading	
106	Capitol photo w signs.jpg			
107	Capitol Police Area Closed Sign.JPG			
108	Aerial Diagram of Capitol Grounds			
109	Timelapse of Capitol West Front Surveillance Video			
110	USCP Video Montage with Radio Runs			
111	14:28:18 PM EST National Curfew Text Message			
112	19:36:02 PM EST National Curfew Text Message	FRE 106 incomplete		
113	Mayor Bowser Emergency Alert - DC DHS Tweet.pdf	FRE 106 incomplete		
114	FEMA/DC DHS Certificate of Authenticity	6th Amendment right to confront		
115	Safeway Early Closure Notice for Washington DC stores 1/6/21	FRE 106 incomplete		
116	Safeway Mid-Atlantic Daily Sales Report for Washington DC stores 1/5/21 to 1/7/21			
117	Safeway Warehouse Shipments Lancaster, PA to Washington, DC stores 1/3/21 to 1/9/21			
118	Safeway, Inc. Certificate of Authenticity	6 <sup>th</sup> Amendment right to confront		
119	U.S. Capitol & Grounds 3D Rendering			
120	CCTV 0926 E USCG (timestamped) 00 Upper Terrace West-2021-01-06_16h20min			
121	DC Mayor Emergency	106 Incomplete		
<b>200 Series</b>	<b>Secret Service Exhibits</b>			
201	HOS Notification – Visit of Vice President Michael Pence Mrs. Pence and Charlotte Pence to the U.S. Capitol (S-214_House and Senate Floors) on Wednesday January 6 (PDF)	FRE 401, 403		
202	USSS HOS Notification – Vice President Pence 01.06.21 9 (REDACTED) (PDF)	FRE 401, 403		
203	CCTV 9322 footage of Vice President Pence's motorcade leaving East side of Capitol, 1:58:40 -- 1:59:40 PM	FRE 401, 403		
204	CCTV 0462 footage of Vice President Pence and family exiting Senate Chamber, 2:25:47 -- 2:26:20 PM	FRE 401, 403		
205	Placeholder for additional exhibits			
<b>300 Series</b>	<b>Body-Worn Camera</b>			
301	BWC X6039BEYS - AC.2021.01.06.154027.mp4			
302	BWC X6039BA8J - BD.2021.01.06.151142.mp4			
303	BWC X6039B9WG - DPL.2021.01.06.162145.mp4			
303X	BWC X6039B9WG - DPL.2021.01.06.162145.OpenSource.ThomasVideo			
304	BWC X6039BDFA- MN.2021.01.06.153029.mp4			
305	BWC X6039BCMP - KV.2021.01.06.162600.mp4			
305X	BWC X6039BCMP - KV.2021.01.06.162600.BWC X6039B9WG.ThomasVideo.mp4		Upper West Terrace hold the line	
306	BWC X6039BJHS - LT.2021.01.06.162043.mp4			
306X	BWC X6039BJHS - LT.2021.01.06.162043.mp4			
307	BWC X6039BF3Q - RA.2021.01.06.153030.mp4			
307X	BWC X6039BF3Q - RA.2021.01.06.153030.mp4.BWC X6039BDFA.		Stairs Incident	
308	BWC X6039BFL0 - RN.2021.01.06.162818.mp4			
308X	BWC X6039BFL0 - RN.2021.01.06.162818.mp4			
309	BWC X6039BEYS - AC.2021.01.06.151200			
309X	BWC X6039BEYS - AC.2021.01.06.151200.ThomasVideo		Scaffolding Campanale	
310	BWC X6039BDFA- MN.2021.01.06.153322.mp4		Please Stand down This is our house	
310X	BWC X6039BDFA- MN.2021.01.06.153322.mp4			
311	Placeholder for additional exhibits			

USA v.  
THOMA  
S 21-cr-  
00552  
(DLF)  
 Govt Exhibit List -  
 May 9, 2023

Govt Ex. No.	Description of Exhibit	Marked for I.D.	Received in Evidence	Witness
<b>400 Series</b>	<b>Thomas's Facebook Return</b>			
401	Facebook Inc. Business Records Certification		Authenticity	
402.1 (binder # only)	402.1.4666304223384789.mp4	FRE 106-incomplete. Sound?		
402.1 (binder # only)	402.2.4666305120051366.mp4			
402.2 (binder # only)	402.3.4666306093384602.mp4			
403.2 (binder # only)	402.4.4666307473384464.mp4			
402.4 (binder # only)	402.4.4666312863383925.mp4			
402.1008	402.1008 - Caravan Post Black Map.pdf			
402.3717	402.3717 - 12th Amendment.pdf			
402.3733	402.3733 - Do you have his (back).pdf	FRE 801, 403		
402.3788	402.3788 - We Conceded Nothing - Post re Elecoral.pdf	FRE 403		
402.8825	402.8825 - Justice is Coming - Lightning bolt Cap.pdf	FRE 401		
402.14877	402.14877 - Night pic of Cap - Restraint Post.pdf	FRE 401, 403		
402.15013	402.15013 - Ltr re Election Anomalies.pdf			
402.15014	402.15014 - Ltr re Election Anomalies.pdf			
402.15015	402.15015 - Ltr re Election Anomalies.pdf			
402.15016	402.15016 - Ltr re Election Anomalies.pdf			
402.15465	402.15465 - Hold the line meme.pdf	FRE 403, 406		
402.16937	402.16937 - 2nd American Revolution.pdf	FRE 401, 403		
402.16941	402.16941 - DC or Bust - Midnight Ride.pdf			
402.16942	402.16942 - J6 - Answer the Presidents Call.pdf	FRE 401		
402.19074	402.19074 - Treason.pdf	FRE 403		
402.19075	402.19075 - Treason.pdf			
402.21411	402.21411 - Fed Up - Caravan.pdf	FRE 106- incomplete		
402.23508	402.23508 - List of J6 videos.pdf	FRE 401, 403		
402.9901	402.9901 - Midnight ride or bust - Cap image Pi Symbol.pdf	FRE 403, 801		
402.5522	402.5522 - Midnight Ride Routes - Caravan_Redacted.pdf	FRE 801	Hearsay	
402.15773	402.15773 - Midnight Riders Mount Up.pdf	FRE 401, 403		
402.16036	402.16036 - Statutes re Govt Overthrow.pdf	FRE 704		
402.11337	402.11337 - BOLO 214.pdf	FRE 106		
403	403 - West Front Bleachers 1.mp4			
404	404 - West Front Bleachers 2.mp4			
405	405 - West Front Bleachers 3.mp4			
406	406 - West Front Bleachers 4.mp4			
407	Placeholder for additional exhibits			

**USA v. THOMAS**  
**21-cr-00552 (DLF)**  
**Govt Exhibit List - May 9, 2023**

Govt Ex. No.	Description of Exhibit	Marked for I.D.	Received in Evidence	Witness
<b>500 Series</b>	<b>Other Thomas Evidence</b>			
501	Sovereign Souls - Episode 1	FRE 401, 106		
502	Freedom Unchained - Episode 2	FRE 401, 106		
503	Justice in Jeopardy - J6   Joseph Thomas   Pi Anon	FRE 401, 106		
504	Capitol Pi - Rumble	FRE 401, 106		
505	Pi Anon at the Capitol (bonus footage) - Rumble	FRE 401, 106		
506	Prelude to Why Pi was Arrested by the Feds - Rumble	FRE 401, 106		
507	Midnight Ride Caravan Richmond + CBS6 INTERVIEW - YouTube-3	FRE 401, 106		
508	PiAnon Telegram Post re AFO#214	FRE 401, 106		
509	United States Navy Records - Thomas, Kenneth Joseph Owen - with Certification	FRE 401, 106		
510	YouTube - Rally at the Ellipse	FRE 401, 106		
511	YouTube - Constitution Avenue	FRE 401, 106		
512	YouTube - Cover Page	FRE 401, 106		
513	YouTube - March for Trump (At the Capitol) 1	FRE 401, 106		
514	YouTube - March for Trump (At the Capitol) 2	FRE 401, 106		
515	YouTube - March for Trump (At the Capitol) 3	FRE 401, 106		
516	YouTube - March for Trump (At the Capitol) 4	FRE 401, 106		
517	YouTube - March for Trump (Before the Capitol)	FRE 401, 106		
518	YouTube Certification - Letter_6139529	FRE 401, 106		
519	Placeholder for additional exhibits			
<b>600 Series</b>	<b>Physical Items</b>			
601	Veterans for Trump Hat			
602	Berne Jacket			
603	302 re Seizure with Attachments, Serial 73			
604	Placeholder for additional exhibits			
<b>700 Series</b>	<b>Non-Thomas Open Source</b>			
701	Jan6 rally est. 9:16AM - Parler			
702	Screw Big Gov - YouTube			
703	Upper NWT - Central Grandstand est. 3:25PM - Parler			
704	TweetTV JP - YouTube			
705	rgDWmSDLhmhC.mp4 est. 3:59PM - Parler			
706	SCNRbot - YouTube			
707	goodlionfilms_FC1A0E41 - Telegram			
708	AZ Patriot - YouTube			
709	4K Footage-8Vh8wPco6Jk-1080p-1658509195974 - YouTube			
710	Re Parker71 est. 4:22PM - Parler			
711	dream floral - West Terrace.2021.01.06.1622 - YouTube			
712	NadyasNotes 20210106_162104.mp4			
713	Brendan Smilaowski - GettyImages1			
714	Brendan Smilaowski - GettyImages2			
715	Brendan Smilaowski - GettyImages3			
716	lkfAPTp1BwRS.mp4 est. 4:33PM - Parler			
717	The Daily Citizen (FocusCitizen) Updates from Capitol Hill.mp4 - Facebook			
718	DLive   Zykotik DC Rally!			
719	Placeholder for additional exhibits			

## II. DEFENDANT'S OBJECTIONS

**Govt Ex. No. 100)** Safeway Records -- OBJECTED to under FRE 401 and 403, because there were an estimated 500,000 to 1 million demonstrators within the District of Columbia, only 10,000 of which were at the U.S. Capitol per the U.S. Capitol Police (then Deputy Chief Pittman's testimony) and the records do not distinguish between the effects of the demonstrators in the City who were not party to any activity at the Capitol. To the extent Safeway claims it closed early, again, this does not distinguish between the large numbers of people in the City and those on Capitol Hill. The records would mislead and confuse the jury. Furthermore, the records do not identify retail sales of items that would merely be sold on the following day instead of on January 6, 2021.

**Govt Ex. No. 103)** OBJECTED to under FRE 403 and FRE 106. The Government's video montages are an alteration of evidence. They are therefore misleading as to the actual evidence. (Whatever one thinks of the message conveyed, they are not the actual evidence.) To be used as demonstrative exhibits, the actual evidence must be presented and the criteria satisfied.

**Govt Ex. No. 104)** OBJECTED to under FRE 401 and FRE 403. Thomas is charged with violating 18 U.S.C. 1752(a)(1).

**Govt Ex. No. 105)** OBJECTED under FRE 401 and FRE 403, because Restricted Perimeter.png as far as we know was created for the purposes of litigation. We know it was never posted at the U.S. Capitol and was never visible to any of the crowd on January 6, 2021. The photograph is an unauthenticated pigeon eye's view of the dome of the Capitol. No witness can testify that it fairly represents what the Capitol would look like if they were flying above the Capitol. But the red lines have been added electronically. There were no red lines painted on the ground in the real world.

**Govt Ex. No. 106)** OBJECTED to under FRE 401 and FRE 403. The Government persistently ignores that these signs were taken down at about 1:00 PM whereas Thomas did not reach the Capitol until around 2:24 PM. The signs were not there when Thomas was there. Without a time component, evidence that at some point in time there were signs, but not necessarily when a Defendant was present, is beyond is misleading but straight out deceptive.

**Govt Ex. No. 112)** OBJECTED TO as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 113)** OBJECTED TO as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 114)** OBJECTED TO as requiring cross-examination under the Sixth Amendment.

**Govt Ex. No. 115)** OBJECTED TO as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 201)** OBJECTED under FRE 401 and FRE 403, because Thomas was not inside the Capitol or anywhere near Mike Pence or the others identified.

**Govt Ex. No. 202)** OBJECTED under FRE 401 and FRE 403, because Thomas was not inside the Capitol or anywhere near Mike Pence or the others identified.

**Govt Ex. No. 203)** OBJECTED under FRE 401 and FRE 403, because it is entirely irrelevant that Michael Pence leaving is not relevant, and also Thomas was not on the East side of the Capitol and was not inside the Capitol or anywhere near Mike Pence or the others identified.

**Govt Ex. No. 204)** OBJECTED under FRE 401 and FRE 403, because it is entirely irrelevant that Michael Pence leaving is not relevant, and also Thomas was not on the East side of the Capitol and was not inside the Capitol or anywhere near Mike Pence or the others identified. Defendant will stipulate that Mike Pence, family, and others left the U.S. Senate Chamber, but only that he left (there are reports that Pence himself did not want to leave the Capitol because he perceived no threat).

**Govt Ex. No. 402)** Facebook video 402.1 is objected to in that it has no sound although being taken from Thomas's phone. Therefore, it is incomplete under FRE 106.

Facebook meme 402.3733 "Do we have his back?" is objected to under FRE 801 (hearsay) and FRE 403 as it is of limited relevance, and is likely to be emotional not evidentiary. It is also an attempt at habit evidence against FRE 406 in trying to persuade the jury that if someone posts memes on Facebook therefore the Defendant probably committed the crime, as a habit or predisposition. Furthermore, if the Defendant cannot put on evidence of Thomas' intent, mens rea, and/or purpose, it would be unfairly prejudicial for the Government to address the point that the Defendant is not allowed to address.

Facebook meme 402.3788 - We Conceded Nothing -- is objected to under FRE 801 (hearsay) and FRE 403 as it is of limited relevance, and is likely to be emotional not evidentiary. It is also an attempt at habit evidence against FRE 406 in trying to persuade

the jury that if someone posts memes on Facebook therefore the Defendant probably committed the crime, as a habit or predisposition. Furthermore, if the Defendant cannot put on evidence of Thomas' intent, mens rea, and/or purpose, it would be unfairly prejudicial for the Government to address the point that the Defendant is not allowed to address.

Facebook meme 402.8825 - Justice is Coming - Lightning bolt Cap -- is objected to under FRE 801 (hearsay) and FRE 403 as it is of limited relevance, and is likely to be emotional not evidentiary. It is also an attempt at habit evidence against FRE 406 in trying to persuade the jury that if someone posts memes on Facebook therefore the Defendant probably committed the crime, as a habit or predisposition. Furthermore, if the Defendant cannot put on evidence of Thomas' intent, mens rea, and/or purpose, it would be unfairly prejudicial for the Government to address the point that the Defendant is not allowed to address.

Facebook meme 402.14877 - Night pic of Cap - Restraint Post -- is objected to under FRE 801 (hearsay) and FRE 403 as it is of limited relevance, and is likely to be emotional not evidentiary. It is also an attempt at habit evidence against FRE 406 in trying to persuade the jury that if someone posts memes on Facebook therefore the Defendant probably committed the crime, as a habit or predisposition. Furthermore, if the Defendant cannot put on evidence of Thomas' intent, mens rea, and/or purpose, it would be unfairly prejudicial for the Government to address the point that the Defendant is not allowed to address.

Facebook meme 402.15465 - Hold the line meme -- is objected to under FRE 801 (hearsay) and FRE 403 as it is of limited relevance, and is likely to be emotional not evidentiary. It is also an attempt at habit evidence against FRE 406 in trying to persuade the jury that if someone posts memes on Facebook therefore the Defendant probably committed the crime, as a habit or predisposition. Furthermore, if the Defendant cannot put on evidence of Thomas' intent, mens rea, and/or purpose, it would be unfairly prejudicial for the Government to address the point that the Defendant is not allowed to address.

Facebook meme 402.16937 - 2nd American Revolution is objected to under FRE 801 (hearsay) and FRE 403 as it is of limited relevance, and is likely to be emotional not evidentiary. It is also an attempt at habit evidence against FRE 406 in trying to persuade the jury that if someone posts memes on Facebook therefore the Defendant probably committed the crime, as a habit or predisposition. Furthermore, if the Defendant cannot put on evidence of Thomas' intent, mens rea, and/or purpose, it would be unfairly prejudicial for the Government to address the point that the Defendant is not allowed to address.

Facebook meme 402.16942 - J6 - Answer the Presidents Call -- is objected to under FRE 801 (hearsay) and FRE 403 as it is of limited relevance, and is likely to be emotional not evidentiary. It is also an attempt at habit evidence against FRE 406 in trying to persuade the jury that if someone posts memes on Facebook therefore the Defendant probably committed the crime, as a habit or predisposition. Furthermore, if the Defendant cannot put on evidence of Thomas' intent, mens rea, and/or purpose, it would be unfairly prejudicial for the Government to address the point that the Defendant is not allowed to address.

Facebook post 402.19074 – Treason -- is objected to under FRE 801 (hearsay) and FRE 403 as it is of limited relevance, and is likely to be emotional not evidentiary. It is also an attempt at habit evidence against FRE 406 in trying to persuade the jury that if someone posts memes on Facebook therefore the Defendant probably committed the crime, as a habit or predisposition. Furthermore, if the Defendant cannot put on evidence of Thomas' intent, mens rea, and/or purpose, it would be unfairly prejudicial for the Government to address the point that the Defendant is not allowed to address.

Facebook post 402.21411 - Fed Up – Caravan as incomplete under FRE 106, apparently by an error in saving a copy of the post (not hitting "see more"). The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

Facebook post 402.23508 - List of J6 videos Call -- is objected to under FRE 801 (hearsay) and FRE 403 as it is of limited relevance, and is likely to be emotional not evidentiary. It is also an attempt at habit evidence against FRE 406 in trying to persuade the jury that if someone posts memes on Facebook therefore the Defendant probably committed the crime, as a habit or predisposition. Furthermore, if the Defendant cannot put on evidence of Thomas' intent, mens rea, and/or purpose, it would be unfairly prejudicial for the Government to address the point that the Defendant is not allowed to address.

Facebook post 402.9901 - Midnight ride or bust - Cap image Pi Symbol Call -- is objected to under FRE 801 (hearsay) and FRE 403 as it is of limited relevance, and is likely to be emotional not evidentiary. It is also an attempt at habit evidence against FRE 406 in trying to persuade the jury that if someone posts memes on Facebook therefore the Defendant probably committed the crime, as a habit or predisposition. Furthermore, if the Defendant cannot put on evidence of Thomas' intent, mens rea, and/or purpose, it would be unfairly prejudicial for the Government to address the point that the Defendant is not allowed to address.

Facebook post 402.5522 - Midnight Ride Routes - Caravan\_Redacted -- is objected to under FRE 801 (hearsay). It is also an attempt at habit evidence against FRE 406 in trying to persuade the jury that if someone posts memes on Facebook therefore the Defendant probably committed the crime, as a habit or predisposition. Furthermore, if the Defendant cannot put on evidence of Thomas' intent, mens rea, and/or purpose, it would be unfairly prejudicial for the Government to address the point that the Defendant is not allowed to address.

Facebook post 402.15773 - Midnight Riders Mount Up Call -- is objected to under FRE 801 (hearsay) and FRE 403 as it is of limited relevance, and is likely to be emotional not evidentiary. It is also an attempt at habit evidence against FRE 406 in trying to persuade the jury that if someone posts memes on Facebook therefore the Defendant probably committed the crime, as a habit or predisposition. Furthermore, if the Defendant cannot put on evidence of Thomas' intent, mens rea, and/or purpose, it would be unfairly prejudicial for the Government to address the point that the Defendant is not allowed to address.

Facebook post 402.16036 - Statutes re Govt Overthrow -- is objected to under FRE 704 as being evidence supplanting the jury's fact finding with an ultimate issue to be decided in the case.



Facebook post 402.11337 - BOLO 214 is objected to as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 500)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 501)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentar OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 502)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 503)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 504)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 505)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 506)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 507)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 508)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 509)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 510)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 511)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 512)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 513)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 514)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 515)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire

document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 516)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 517)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 518)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

**Govt Ex. No. 519)** OBJECTED TO under FRE Rule 401 as not relevant because it was generated after January 6, 2021, and as incomplete under FRE 106. The entire document and message must be produced, instead of (not in addition to) the proposed exhibit. See commentary to FRE 106.

Date: May 11, 2023

Respectfully Submitted,

/s/ John M. Pierce

John M. Pierce

21550 Oxnard Street

3rd Floor, PMB #172

Woodland Hills, CA 91367 Tel:

(213) 400-0725

Email: [jpierce@johnpiercelaw.com](mailto:jpierce@johnpiercelaw.com)

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on May 11, 2023, this motion was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ John M. Pierce

John M. Pierce