## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

## UNITED STATES OF AMERICA : v. : VICTORIA CHARITY WHITE :

CRIMINAL NO. 21-CR-563 (JDB)

## **Notice of Intent to Introduce Expert Evidence**

COMES NOW Defendant Victoria Charity White, by and through her counsel, and hereby files a notice of intent to introduce expert evidence relating to use of force, security protocols and crowd control techniques used by law enforcement, specifically The Metropolitan Police Department and The United States Capitol Police, on January 6, 2021. This notice is filed pursuant to Fed. Crim. P. 16(b)(1)(C). A curriculum vitae of the proposed expert was sent to the government via email on February 24, 2023.

Respectfully submitted,

/s/Nicole Cubbage

Nicole Cubbage DC Bar No. 999203 712 H. Street N.E., Unit 570 Washington, D.C. 20002 703-209-4546 <u>cubbagelaw@gmail.com</u> Attorney for Victoria White

## Certificate of Service

I certify that a copy of the forgoing was filed electronically for all parties of record on this 24th day of February, 2023.

\_\_\_\_/s/\_\_\_\_ Nicole Cubbage Attorney for Victoria White