

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

UNITED STATES OF AMERICA

v.

DARRELL ALAN YOUNGERS,

Defendant.

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Case No. 1:21-cr-640 (TFH)

GOVERNMENT’S NOTICE OF FILING OF VIDEO EXHIBIT
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 video exhibit to the Government’s Sentencing Memorandum. The video has been provided to defense counsel in discovery and will be provided to defense counsel and the Court via USAfx. As a video, it is not in a format that readily permits electronic filing on CM/ECF.

The video is as follows:

1. Exhibit 1: A video recorded at the U.S. Capitol on January 6, 2021 by Darrell Alan Youngers using a cell phone. The video is one minute and 31 seconds long. At timestamp 0:06, Youngers yells, “We are inside the Capitol Building. It has been overrun.” At 0:22, he continues, “The Capitol Building has literally been broken into.” At 0:39, he declares, “This is what a revolution motherfucking looks like.” At timestamp 1:20, Youngers yells “By the people!” repeatedly.

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

Respectfully submitted,

MATTHEW M. GRAVES
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/s/ Alexis J. Loeb

ALEXIS J. LOEB

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