

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

_____)	
UNITED STATES OF AMERICA)	
)	No. 3:21-CR-596 (BAH)-2
v.)	
)	
JEAN LAVIN)	January 6, 2022
_____)	

**DEFENDANT JEAN LAVIN’S RESPONSE TO MINUTE ORDER
CONCERNING GOVERNMENT’S PROPOSED VIDEO AND PHOTO EVIDENCE**

Defendant Jean Lavin, by and through counsel, responds to the Court’s Minute Order, filed Jan. 4, 2022, which directs “the parties to provide their positions whether . . . photo and video evidence [‘relied upon’ by the Government ‘as support for the Statement of Offense filed in connection with defendant’s plea agreement’] may be made publicly available without restriction.” Defendant Lavin has no objection to those items identified by the Government via the Notice provided at ECF No. 36 being made publicly available without restriction by the Court. For the Court’s reference, excerpts from a number of the videos identified by the Government already were made public in connection with the

criminal complaint, see ECF No. 1-1, at 2-7, and have been used already by various media outlets.¹

Respectfully Submitted,

/s/Charles F. Willson/s/

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CERTIFICATION OF SERVICE

This is to certify that on January 6, 2022, a copy of the foregoing was filed electronically via the Court's CM/ECF system, and by that system, counsel for the Government has been provided with a copy of the foregoing.

/s/Charles F. Willson/s/

Charles F. Willson

¹ See, e.g., Nina Golgowski, *Mom and Teen Daughter Arrested For Alleged Roles In Jan. 6 Attack*, HUFFPOST, Sept. 14, 2021 (appearing to duplicate number of photos made available in connection with criminal complaint) available at [Mom And Teen Daughter Arrested For Alleged Roles In Jan. 6 Attack | HuffPost Latest News](#); Lucia Suarez Sang, *Canterbury mother, daughter arrested for alleged participation at US Capitol riots*, FOX61, Sept. 14, 2021 (same), available at [CT mother, daughter arrested for involvement in US Capitol riots | fox61.com](#), and [Canterbury mother, daughter arrested for alleged participation at US Capitol riots \(msn.com\)](#).