

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CASE NO. 21-CR-647</b>
v.	:	
	:	
<b>BENJAMEN SCOTT BURLEW,</b>	:	
	:	
<b>Defendant.</b>	:	

**GOVERNMENT’S AMENDED EXHIBIT LIST**

The Government provides this amended list of exhibits that the government may use during its case-in-chief. The Government may determine that some of these exhibits are not necessary, or it may determine that additional exhibits are necessary. The Government also anticipates that it will introduce extracts, including video clips and screenshots, from the below listed exhibits. The Government will promptly inform the Court and defense if the Government determines that additional exhibits may be necessary. The potential exhibits are:

Exhibit No.	Description	Marked for ID	Received in evidence	Published
<b><i>CAPITOL BUILDING AND GROUNDS</i></b>				
001	USCP CCV Video Montage			
002	House and Senate Video Montage			
003	Restricted Perimeter			
004	Photograph of Capitol			
005	Capitol Building – 3D Map			
006	US Capitol Grounds Map			
007	US Capitol Ground Level Map			
008	Photograph of “Area Closed” sign			
009	Photograph of “Area Closed” signs			
010	Certificate of Authenticity - Senate Recording Studio			
011	Certificate of Authenticity of Records - House Recording Studio			
012	Jan. 5, 2021 email and Head of State Worksheet			

<b><i>BODY WORN CAMERA FOOTAGE</i></b>				
100	Body Worn Camera Footage – R.W.			
100a	Body Worn Camera Footage – R.W. – enhanced			
100b	Screenshot (00:09)			
101	Body Worn Camera Footage – O.F.			
101a	Body Worn Camera Footage – O.F. – enhanced			
101b	Screenshot (00:36)			
101c	Screenshot (00:38)			
101d	Screenshot (00:40)			
102	Body Worn Camera Footage – C.M.			
102a	Body Worn Camera Footage – C.M. – enhanced			
102b	Screenshot (00:37)			
102c	Screenshot (00:46)			
102d	Screenshot (00:52)			
103	Body Worn Camera Footage – J.C. – enhanced			
103a	Screenshot (00:49)			
104	Body Worn Camera Footage – O.A. – enhanced			
104a	Screenshot (00:05)			
<b><i>OPEN-SOURCE VIDEOS AND IMAGES</i></b>				
200	Video of Burlew loading magazine			
200a	Screenshot (00:19)			
201	Video of Burlew on the Upper West Plaza (Part 4 of 6 – What really happened at Trump rally in D.C.)			
201a	Screenshot (00:03)			
201b	Screenshot (00:28)			
201c	Screenshot (00:37)			
201d	Screenshot (00:39)			
202	Video of Burlew on the Upper West Plaza (YouTube ABQ Raw)			
202a	Screenshot (00:25)			
202b	Screenshot (00:25)			
202c	Video of Burlew on the Upper West Plaza (YouTube ABQ Raw) – without enhancements			
203	Video of Burlew on the Upper West Plaza (Inside the 2021 Storming of the United States Capitol)			
203a	Screenshot (00:34)			
203b	Screenshot (00:51)			
203c	Screenshot (00:55)			
204	Video of Burlew Identifying Himself (#CitizensMediaNews)			
204a	Screenshot (00:12)			
205	Video of Burlew on the Upper West Plaza (Video of Assault on J.M.)			
205a	Screenshot (00:28)			

205b	Screenshot (00:43)			
205c	Screenshot (00:57)			
205d	Screenshot (01:03)			
205e	Screenshot (01:04)			
206	Video of Burlew Near West Plaza Barricade (NEW FOOTAGE January 6 Capitol Hill Protest)			
206a	Screenshot (00:18)			
207	Video of Burlew climbing the Scaffolding (Insurgence USA long – Full Video Trump Supporters Storming the Capitol)			
207a	Screenshot (00:22)			
207b	Screenshot – closeup			
208	Image of Burlew on Scaffolding			
209	Video of Burlew Walking Away from Scaffolding (©Nigrotime2021)			
210	Video of Burlew in Scaffolding			
210a	Screenshot (00:41)			
211	Video of Burlew near Northwest stairs			
<b><i>SAFEWAY RECORDS</i></b>				
300	Certificate of Authenticity			
301	Safeway Early Closure Notice for Washington, DC stores 1/6/2021			
302	Safeway Mid-Atlantic Daily Sales Report for Washington, DC stores 1/5/2021 -1/7/2021			
303	Safeway Warehouses Shipments Lancaster, PA to Washington, DC			
<b><i>CURFEW DOCUMENTS</i></b>				
400	D.C. Mayor's Order 2021-002			
401	Curfew Tweet			
<b><i>JAIL CALLS</i></b>				
500	Jail Call 1 – clip 1			
501	Jail Call 1 – clip 2			
502	Jail Call 2 – clip 1			
503	Jail Call 2 – clip 2			
504	Certification of Authenticity			
<b><i>CCV FOOTAGE</i></b>				
600	CCV Footage – West Terrace			
601	CCV Footage – West Terrace			
602	CCV Footage – Stairs and Scaffolding			
602a	Screenshot (00:08)			
603	CCV Footage – Interior Stairwell			

Respectfully submitted,

MATTHEW M. GRAVES  
United States Attorney  
D.C. Bar No. 481052

DATED: December 1, 2023

By: /s/ Anna Z. Krasinski  
Anna Z. Krasinski  
Assistant United States Attorney  
New Hampshire Bar No. 276778  
United States Attorney's Office  
Detailed from the District of New Hampshire  
Phone: (202) 809-2058  
Email: anna.krasinski@usdoj.gov

Jennifer Leigh Blackwell  
Assistant United States Attorney  
D.C. Bar No. 481097  
U.S. Attorney's Office for the District of Columbia  
601 D Street, N.W.  
Washington, D.C. 20530  
Phone: (202) 803-1590  
Email:jennifer.blackwell3@usdoj.gov