

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

UNITED STATES OF AMERICA :
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 :
 v. : **Case No. 21-CR-620 (BAH)**
 :
ANTHONY VUKSANAJ, :
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 Defendant. :

NOTICE OF FILING OF ITEMS INCOMPATIBLE WITH CM/ECF FILING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, in accordance with Local Rule 49(e)(1), hereby files this notice of filing of the following exhibits that are incompatible with CM/ECF filing pursuant to the Court’s January 18, 2022 Minute Order directing the government to submit certain video evidence. The items are seven videos that are exhibits 1 through 7. The government has no objection to the public release of these exhibits. The government will make the following video exhibits available to the Court electronically:

1. Exhibit 1 is a Closed Circuit Video (CCV) from the U.S. Capitol Police at 2:20 pm that is 56 seconds long. The Defendant is seen entering the Capitol building at the beginning of the video. He walks past broken glass at approximately time stamp 00:10-00:17. He faces toward individuals climbing in through a window at approximately time stamp 00:32-00:37.

2. Exhibit 2 is an open source video bearing the watermark “THERESISTANCE.VIDEO” at approximately 2:30 pm that is 2 minutes and 12 seconds long. At approximately time stamp 0:18, the Defendant is seen walking with a crowd that is chanting “USA, USA” and looking at his phone. At approximately time stamp 0:58, the Defendant is seen again as the crowd chants, “Whose house, our house.” At approximately time stamp 1:46, the Defendant is seen making his way up the stairs with the crowd as the crowd chants, “Nancy, Nancy.” At approximately time stamp 1:56-2:10, a rioter standing in the vicinity of VUKSANAJ coughs and then comments, “there is so much gas, it’s burning my nostrils.”

3. Exhibit 3 is CCV from the U.S. Capitol Police at 2:39 pm that is 42 seconds long. The Defendant is seen in the Statutory Hall Connector area for the duration of the video.

4. Exhibit 4 is an open source video that is 2 minutes and 55 seconds long in the area of the Ohio Clock Corridor. The Defendant is seen at approximately time stamp 2:11, and throughout the video, the crowd can be heard reciting various chants including, "You serve us," and "Fuck McConnell."

5. Exhibit 5 is the Body Worn Camera of a Metropolitan Police Officer at 2:46 pm that is 3 minutes and 4 seconds long. It is in the area of the Ohio Clock Corridor as law enforcement attempted to push back and control a crowd in that area. The Defendant can be seen intermittently throughout the video.

6. Exhibit 6 is CCV from the U.S. Capitol Police at approximately 2:59 pm that is 1 minute and 10 seconds long. The Defendant is seen in the Rotunda using his phone and walking around for the duration of the video.

7. Exhibit 7 is CCV from the U.S. Capitol Police at approximately 3:00 that is 18 seconds long. The Defendant is seen walking toward an exit of the U.S. Capitol Building.

Respectfully Submitted,

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