

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

UNITED STATES OF AMERICA	:	
	:	Case No. 1:22-cr-182 (BAH)
v.	:	
	:	
CHAD CLIFTON,	:	
	:	
Defendant.	:	

**GOVERNMENT’S SUPPLEMENTAL REPORT AND POSITION
REGARDING PHOTO AND VIDEO EVIDENCE**

Pursuant to this Court’s January 9, 2023 Minute Order, the United States will make the following evidence available to the Court electronically:

No.	File Name	Length	Source	Description
1	Video file: IMG_5172	23 minutes, 52 seconds	Chad Clifton	<p>Video taken by Clifton outside and entering Capitol building.</p> <p>Rioter telling Clifton that law enforcement can use lethal force if they go inside, right before Clifton goes inside at 17:10</p> <p>Clifton heard saying “bunch of fucking pricks” at 5:34</p> <p>Flash bangs throughout including at 5:15</p> <p>Police presence and bike rack barriers visible throughout video from :00 to 7:00.</p> <p>LRAD system heard throughout including at :10 and 1:08.</p> <p>Objects and chemical irritant thrown/sprayed at police line throughout video, including at: 1:16, 2:32, 5:23.</p> <p>Fighting between rioters and law enforcement including at 5:45 – 6:45.</p> <p>Clifton says “we’ve broken past the barrier The policemen</p>

				have been overwhelmed! The amount of people coming up the stairs - the patriotism” and “this is what has to be done” at 13:48. Rioter saying, “we breached the door” at 15:00.
2	https://vimeo.com/500625255	10 minutes, 20 seconds	Open Source Footage	Video showing different angle of same time period and area where Clifton’s video No. 1 (above) was filmed. <i>See</i> 4:51 to 6:04, 6:04 to 7:18.
3	BWC Clip _ Clifton sentencing.mp4	2 minutes, 47 seconds	Metropolitan Police Department Body Worn Camera	Officer’s body worn camera showing different angle of same time period and area where Clifton’s video No. 1 (above) was filmed.
4	GH010089.MP4	8 minutes, 19 seconds	Open Source Footage	Footage showing Clifton and Johnston outside Capitol building videoing while rioters clash with law enforcement. <i>See</i> 0:00 to 2:00.
5	Video file: IMG_5180	1 minute, 14 seconds	Chad Clifton	Video taken by Clifton walking through Capitol building, including in Crypt. Sirens heard throughout, including at :46, :56.
6	Video file: IMG_5182	7 minutes, 45 seconds	Chad Clifton	Video taken by Clifton walking through Capitol building and leaving the Capitol building. Clifton smoking marijuana inside Capitol building while saying “fuck it while you’re hitting it let me hit it one time. . . . I don’t give a fuck. We in Washington DC burning in the Capitol” at 3:50
7	Image file: 5E66908B-2A2A-4AA9-8207-21659C22DAE6-L0-001	N/A	Chad Clifton	Photo of Capitol grounds exterior, showing bike racks and snow fencing.
8	Image file: E21A4924-1046-4A83-AD72-12177C958650-L0-	N/A	Chad Clifton	Photo of Capitol grounds exterior showing line of bike

	001			racks.
9	Image file: 8AA4EA40-1A21-4D42-B09B-99EAACD-L0-001.JPG	N/A	Chad Clifton	Selfie photo taken by Clifton inside Capitol Building
10	Image file: 405D91CE-356F-493A-AFE5-E91C528973A0-L0-001		Chad Clifton	Photo taken by Clifton at front of crowd showing police officers lining up to guard the Capitol building
11	Image file: 4322BBDC-8921-4144-8EFC-152CBD1195A3-L0-001		Chad Clifton	Photo taken by Clifton showing bike racks moved
12	Image file: ADFA3ACC-9E02-47DD-A71B-651EB089E7B2-L0-001		Chad Clifton	Photo taken by Clifton of torn down snow fencing
13	Image file: F9022E8C-57A9-451C-9ABF-65040B6D8006-L0-001		Chad Clifton	Photo taken by Clifton early in the day on January 6, showing AREA CLOSED signs, snow fencing, and bike rack gates surrounding the Capitol

The parties have conferred and agree that all of the above-listed exhibit can be publicly released without restriction.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
DC Bar No. 481052

By: /s/ Ashley Akers
ASHLEY AKERS
MO Bar No. 69601
Trial Attorney, U.S. Department of Justice
Capitol Riot Detailee
601 D Street, N.W.
Washington, D.C. 20002
Tel: (202) 353-0521
Ashley.Akers@usdoj.gov