

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

**UNITED STATES OF AMERICA** :  
 :  
 v. : **Case No. 1:22-CR-267**  
 : **Judge Dabney L. Friedrich**  
**JAMES ROBINSON,** :  
 :  
 **Defendant.** :  
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 :

**GOVERNMENT’S NOTICE OF FILING OF EXHIBITS**  
**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 exhibits that were provided to the Court and defense counsel on May 2, 2023, via USAfx, in relation to the government’s sentencing memorandum (ECF No. 30). These exhibits will be offered into evidence during the sentencing hearing on May 2, 2023. Because the exhibits are video clips, they are not in a format that readily permits electronic filing on CM/ECF.

The below list references all video footage of the defendant. The Court requested a representative sample. That sample is Exhibit 1 at :57–1:25; Exhibit 2 at :00–:15 and 1:19–1:39; Exhibit 4 at :00–:57; Exhibit 7 at 28:15–29:00; Exhibit 8 at :00–:45; and Exhibit 11 at 5:45–6:28. This sample, collectively, is 4 minutes and 13 seconds long.

The proposed exhibits are as follows:

1. Government Exhibit 1 is a clip from closed-circuit video (“CCV”) from the U.S. Capitol building. The clip is six minutes. The events depicted in the exhibit occurred between 2:20 p.m. and 2:26 p.m. on January 6, 2021. The relevant portion is :57–1:25.

2. Government Exhibit 2 is a clip from an open-source video. The clip is 1 minute and 49 seconds. The events depicted in the exhibit occurred in the early afternoon of January 6, 2021, at approximately 2:20 p.m. to 2:22 p.m. The relevant portions are :00–:15 and 1:19–1:39.

3. Government Exhibit 3 is a clip from CCV. The clip is one minute. The events depicted in the exhibit occurred on January 6, 2021, at 2:25 p.m. The relevant portion is :27–:59.

4. Government Exhibit 4 is a clip from open-source video. The clip is 57 seconds. The events depicted in the exhibit occurred in the early afternoon on January 6, 2021. The entire clip is relevant.

5. Government Exhibit 5 is a clip from CCV. The clip is two minutes. The events depicted in the exhibit occurred between 2:40 p.m. and 2:42 p.m. EST on January 6, 2021. The relevant portion is :43–1:05.

6. Government Exhibit 6 is a clip from CCV. The clip is two minutes. The events depicted in the exhibit occurred between 2:40 p.m. and 2:42 p.m. EST on January 6, 2021. The relevant portion is :52–1:15.

7. Government Exhibit 7 is a clip from CCV. The clip is 32 minutes. The events depicted in the exhibit occurred between 2:40 p.m. and 3:12 p.m. EST on January 6, 2021. The relevant portions are 1:10–6:45, 7:44–8:35, 14:06–30:00. The government understands this clip is quite long. The *most relevant* portion, depicting the alleged assault, is 28:15–29:00.

8. Government Exhibit 8 is a clip from the body-worn camera of an officer with the Metropolitan Police Department. The clip is three minutes. The events depicted in the exhibit occurred between 3:08 p.m. and 3:12 p.m. EST on January 6, 2021. The relevant portion is the first 45 seconds.

9. Government Exhibit 9 is a clip from CCV. The clip is five minutes. The events depicted in the exhibit occurred between 3:10 p.m. and 3:15 p.m. EST on January 6, 2021. The relevant portion is 1:45–3:40.

10. Government Exhibit 10 is a clip from CCV. The clip is five minutes. The events depicted in the exhibit occurred between 3:10 p.m. and 3:15 p.m. EST on January 6, 2021. The relevant portion is 2:15–4:25.

11. Government Exhibit 11 is a clip from open-source video. The clip is 6 minutes and 28 seconds. The events depicted in the exhibit occurred after 3 p.m. EST on January 6, 2021. The relevant portions are :20–1:25, 1:50–2:05, 5:45–6:28.

12. Government Exhibit 12 is a video recording from an interview with Defendant Robinson. The clip is 55 minutes and 15 seconds. The recording occurred on May 5, 2022. The portions cited in the government’s memorandum are 14:40–14:50, 15:00–15:30, 15:55–16:20, 17:20–17:45, 18:05–19:30, 21:15–22:00, 46:30–46:45.

If the Court accepts these proposed exhibits into evidence on May 9, 2023, the United States takes the position that the entered exhibits should be promptly released to the public.

Respectfully submitted,

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