

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CASE NO. 21-CR-536</b>
<b>v.</b>	:	
	:	
<b>[1] KAROL J. CHWIESIUK,</b>	:	
<b>[2] AGNIESZKA CHWIESIUK,</b>	:	
	:	
<b>Defendants.</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 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 CCTV Video Montage		X	X
002	House and Senate Video Montage			
003	Restricted Perimeter		X	X
004	Capitol Building – First Floor - 3D Map		X	X
005	Photograph of Capitol		X	X
006	Photograph of “Area Closed” sign		X	X
007	Photograph of “Area Closed” signs		X	X
008	Photograph of “Area Closed” sign		X	X
009	Photograph of “Area Closed” sign		X	X
010	Map of North Side of the Capitol		X	X
011	Map of West Side of the Capitol		X	X
012	Certificate of Authenticity - Senate Recording Studio			
013	Certificate of Authenticity of Records - House Recording Studio			
014	Jan. 5, 2021 email and Head of State Worksheet		X	X

015	Capitol Building – First Floor – S140		X	X
<b>LEGAL AUTHORITY</b>				
101	U.S. Constitution, Amendment XII			
102	3 U.S.C. § 15			
103	3 U.S.C. § 16			
104	3 U.S.C. § 17			
105	3 U.S.C. § 18			
106	Concurrent Resolution			
<b>UNITED STATES CAPITOL POLICE CCV VIDEO</b>				
200	Upper Terrace NE		X	X
200a	Upper Terrace NE – with follow circles		X	X
200b	00:02 screenshot		X	X
200c	00:08 screenshot		X	X
200d	00:39 screenshot		X	X
201	Upper Terrace NE		X	X
201a	Upper Terrace NE – with follow circles		X	X
201b	00:07 screenshot		X	X
201c	00:18 screenshot		X	X
201d	00:36 screenshot		X	X
202	North Screening Egress		X	X
202a	North Screening Egress – with follow circles		X	X
202b	00:04 screenshot		X	X
203	Senate Wing Door		X	X
203a	Senate Wing Door – with follow circles		X	X
203b	00:13 screenshot		X	X
203c	00:19 screenshot		X	X
204	Crypt North		X	X
204a	Crypt North – with follow circles		X	X
204b	0:10 screenshot		X	X
205	Crypt South		X	X
205a	Crypt South – with follow circles		X	X
206	Crypt East		X	X
206a	Crypt East – with follow circles		X	X
206b	00:10 screenshot		X	X
207	Crypt North		X	X
207a	Crypt North – with follow circles		X	X
208	Senate Wing Door		X	X

208a	Senate Wing Door – with follow circles		X	X
208b	00:18 screenshot		X	X
208c	1:20 screenshot		X	X
209	Lower West Terrace Door		X	X
210	Senate Lobby Stairwell		X	X
<b>OPEN-SOURCE VIDEOS</b>				
300	ABC News Special Report		X	X
300a	ABC News Special Report – with follow circles		X	X
300b	0:40 screenshot		X	X
301	YouTube Semore Views		X	X
301a	YouTube Semore Views – with follow circles		X	X
302	Handheld Third-Party Video (West Terrace Video)		X	X
302a	Handheld Third-Party Video – with follow circles		X	X
302b	0:10 screenshot		X	X
303	Handheld Third-Party Video (Romero)		X	X
303a	Handheld Third-Party Video (Romero) – with follow circles		X	X
304a	Handheld Third-Party Video (Baked Alaska)		X	X
304a1	Handheld Third-Party Video (Baked Alaska) – with follow circles		X	X
304b	Handheld Third-Party Video (Baked Alaska) – with follow circles		X	X
304b1	Handheld Third-Party Video (Baked Alaska) – with follow circles		X	X
305	Handheld Third-Party Video (Twitter _ChicanoPatriot)		X	X
305a	Handheld Third-Party Video (Twitter _ChicanoPatriot) - with follow circles		X	X
306	YouTube S.C.N.R.		X	X
306a	YouTube S.C.N.R. – with follow circles		X	X
306b	1:04 screenshot		X	X
307	Video of then-President Trump Speech			
308	Transcript of Trump Speech		X	X
<b>CELLPHONE MATERIALS</b>				
401	Summary Exhibit – Texts with D.Z.		X	X
402	Summary Exhibit Texts with Agnieszka Chwiesiuk		X	X
403	Summary Exhibit – Texts with Pani		X	X
404	Summary Exhibit – Texts with B.C.		X	X

405	Agnieszka Chwiesiuk at the Mayflower Hotel (1609869128652.jpg)		X	X
406	The Capitol at night (1480.jpg)		X	X
407	Snow fencing around the Capitol at night (1485.jpg)		X	X
408	The Capitol at night (1486.jpg)		X	X
409	Karol Chwiesiuk in front of Area Closed sign (1487.jpg)		X	X
410	Agnieszka Chwiesiuk at the Stop the Steal Rally (1526.jpg)		X	X
411	Agnieszka Chwiesiuk at the Stop the Steal Rally (1531.jpg)		X	X
412	Upper West Terrace (1546.jpg)		X	X
413	Upper West Terrace (1547.jpg)		X	X
414	The Chwiesiuk siblings after entering the Senate Wing Doors (1561.jpg)		X	X
415	Karol Chwiesiuk in Senator Merkley's hideaway office (1562.jpg)		X	X
416	Agnieszka Chwiesiuk in the Crypt (1568.jpg)		X	X
417	Agnieszka Chwiesiuk in the Crypt (1569.jpg)		X	X
418	The Naked Cowboy (1609950959313.jpg)		X	X
419	Texts with P.M. (1610670635521.jpg)		X	X
420	Video from Freedom Plaza on Jan. 5, 2021 (20210105_160149.mp4)		X	X
421	Video from the Stop the Steal Rally, Jan. 6, 2021, 11:55 am (20210106_115451.mp4)		X	X
422	Video from the Stop the Steal Rally, Jan. 5, 2021, 11:55 am (20210106_115451_001.mp4)		X	X
423	Video with Capitol in background, Jan. 6, 2021, 2:27 pm (20210106_142713.mp4)		X	X
424	Video on the Upper West Terrace, Jan. 6, 2021, 2:38 pm (20210106_143805.mp4)		X	X
425	Video on the Upper West Terrace, Jan. 6, 2021, 2:56 pm (20210106_145624.mp4)		X	X
426	Video inside the Capitol, Jan. 6, 2021, 2:58 pm (20210106_145751.mp4)		X	X
427	Video inside the Capitol, Jan. 6, 2021, 2:58 pm (20210106_145751_01.mp4)		X	X
428	Video inside the Capitol, Jan. 6, 2021, 2:58 pm (20210106_145751_02.mp4)		X	X

<b>TOLL RECORDS</b>				
500	Certificate of Authenticity (8977 number – Agnieszka Chwiesiuk’s phone)		X	X
501	Subscriber Information (8977 number – Agnieszka Chwiesiuk’s phone)		X	X
502	Device ID (8977 number – Agnieszka Chwiesiuk’s phone)		X	X
503	Certificate of Authenticity (2491 number – Karol Chwiesiuk’s phone)		X	X
504	Subscriber Information (2491 number – Karol Chwiesiuk’s phone)		X	X
<b>KAROL CHWIESIUK - GOOGLE RECORDS</b>				
600	Certificate of Authenticity		X	X
601	Email dated Jan. 4, 2021, re: Expedia car rental		X	X
602	Email dated Jan. 5, 2021, re “Tomorrow”		X	X
603	Email dated Jan. 5, 2021, re “Is it true?”		X	X
604	Email dated Jan. 5, 2021, re “Tomorrow is going to be a historic day in Washington DC.”		X	X
605	Email dated Jan. 6, 2021, re “Today is going to be a historic day in Washington DC.”		X	X
606	Email dated Jan. 6, 2021, re “TODAY”		X	X
<b>MATERIALS FROM P.M.</b>				
700	K. Chwiesiuk messages 1		X	X
701	K. Chwiesiuk messages 2		X	X
702	K. Chwiesiuk messages 3		X	X
703	K. Chwiesiuk messages 4		X	X
704	K. Chwiesiuk messages 5		X	X
705	K. Chwiesiuk messages 6		X	X
706	Image 1		X	X
707	Image 2		X	X
708	Summary exhibit – texts with P.M.		X	X
<b>SYNCED VIDEOS</b>				
800	Synced exhibits 203, 304a, 604, and 303		X	X
801	Synced exhibits 305 and 204		X	X
802	Synced exhibits 209 and 204		X	X
803	Synced exhibits 208 and 304b		X	X

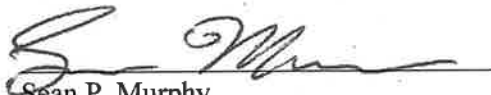
STIPULATIONS				
900	Stipulation regarding Capitol location		X	X
901	Stipulation regarding closed circuit video monitoring		X	X
902	Stipulation regarding police radio communications		X	X
903	Stipulation regarding third party video		X	X
904	Stipulation regarding cellphone evidence		X	X
PHYSICAL ITEMS				
1000	Black jacket			
1001	Black backpack			

Respectfully submitted,

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DATED: August 4, 2023

By:



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