IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA : Case No.: 21-CR-536

:

KAROL J. CHWIESIUK, AGNIESZKA CHWIESIUK,

:

Defendants.

V.

:

STIPULATION OF THE PARTIES

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendants, Karol J. Chwiesiuk and Agnieszka Chwiesiuk, with the concurrence of their attorney, agree and stipulate to the following. The following facts are undisputed and should be accepted as proved beyond a reasonable doubt. Neither party shall be prohibited from calling witnesses to testify about, or introducing evidence to establish, any of the facts listed in these stipulations.

Police Radio Communications

Law enforcement agencies, including the U.S. Capitol Police (USCP) and U.S. Secret Service (USSS), operate and maintain radios that allow officers to communicate with one another and with others while performing their duties. The equipment includes various radio channels, and sometimes allows users to transmit or listen across multiple channels simultaneously. The recordings from these radio communications on January 6, 2021, are accurate, and the audio record was not altered or edited in anyway. The audio files are authentic in that they are what they purport

to be. Specifically, the parties agree that the USCP radio recordings at Exhibit 1 are authentic recordings of those respective radio transmission.

Respectfully submitted,

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

By

Sean P. Murphy
Assistant U.S. Attorney
D.C. Bar No. 1187821
On Detail from the District of Puerto Rico
Torre Chardon, Ste. 1201
350 Carlos Chardon Ave.
San Juan, PR 00918
787-766-5656
sean.murphy@usdoj.gov

/s/ Anna Krasinski

Anna Krasinski
Assistant U.S. Attorney
On Detail from the District of New Hampshire
53 Pleasant Street, 4th Floor
Concord, NH 03301
603-225-1552
anna.krasinski@usdoj.gov

Nishay K. Sanan

53 W. Jackson Blvd, Ste. 1437

Chicago, IL 60604 nsanan@aol.com

312-692-0360

Counsel for Defendant Karol J. Chwiesiuk Counsel for Defendant Agnieszka Chwiesiuk

Cece White

53 W. Jackson Blvd, Ste. 1424

Chicago, IL 60604 cece@sananlaw.com

312-692-0360

Counsel for Defendant Karol J. Chwiesiuk Counsel for Defendant Agnieszka Chwiesiuk

Karol J. Chwiesiuk

Defendant

Agnieszka Chwiesiuk

Defendant