

**IN THE 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>KAROL J. CHWIESIUK,</b>	:	
<b>AGNIESZKA CHWIESIUK,</b>	:	
	:	
<b>Defendants.</b>	:	
	:	

**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.

**Authenticity and Foundation of Electronic Evidence**

On and leading up to January 6, 2021, Karol Chwiesiuk was in possession of and used a Samsung S20+ 5G cellphone associated with the telephone number (773) 910-2491. The Federal Bureau of Investigation generated a digital image of Karol Chwiesiuk’s cell phone, which is an exact and accurate duplicate of the data contained on the phone. The data, including message logs and content, images, videos, and other records, obtained from the extraction of Karol Chwiesiuk’s cell phone and from that image, is authentic and the parties stipulate to the foundation that this data was recovered from the cell phone used by Karol Chwiesiuk. The parties stipulate to the authenticity and foundation of the photos, and videos at Exhibits 405 through 427, which were all

on Karol Chwiesiuk's cellphone. The parties stipulate that the text messages summarized in Exhibits 401-404 are accurate summaries of voluminous records, specifically text message data found on Karol Chwiesiuk's phone, which cannot be conveniently examined in court under Federal Rule of Evidence 1006.

Respectfully submitted,

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By:



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Karol J. Chwiesiuk  
*Defendant*



Agnieszka Chwiesiuk  
*Defendant*