

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

WILLIAM ALEXANDER POPE,

Defendant.

Case No.: 1:21-cr-00128-RC

**SUPPLEMENTAL MOTION TO COMPEL INVENTORY AND
PRODUCTION OF ALL CAPITOL POLICE CCTV FOOTAGE**

On May 11, 2023, I filed ECF No. 113 with the Court seeking to compel the government to inventory and produce all Capitol CCTV footage they have possessed. This matter is still pending before this Court, and I am here submitting supplemental information.

On October 4, 2023, Blaze Media published an article¹ by journalist Steve Baker showing that two Capitol law enforcement officers perjured themselves in their January 6 trial testimony during *U.S. v. Meggs*, 22-cr-00015-APM. This perjury was evidenced using CCTV showing that one of the individuals, Agent David Lazerus, was in the Capitol tunnels at the time he claimed to be witnessing a confrontation (that did not happen) between Officer Harry Dunn and members of the Oath Keepers. Since the government has failed to produce all Capitol CCTV cameras in discovery, including the CCTV cameras showing Agent Lazerus in the tunnels, defense for the Oath Keepers did not have access to the evidence needed to confront the Dunn and Lazerus

¹ Steve Baker's Blaze Media article '*Analysis: Did Pelosi's security chief perjure himself in Oath Keepers trial?*' can be accessed here: <https://www.theblaze.com/columns/analysis/analysis-did-pelosis-security-chief-perjure-himself-in-oath-keepers-trial>

perjuries on the stand. The government violated their *Brady v. Maryland* obligations by withholding exculpatory evidence that would have been favorable to the accused.

This Brady violation illustrates that Capitol CCTV footage can be relevant to a defendant's defense (even if it does not depict the defendant) because it contains information needed to confront government witnesses on the stand. As I pointed out in ECF No. 113 at 2, the government has withheld more than 1000 Capitol CCTV cameras from discovery, including cameras containing relevant and exculpatory facts. I therefore renew my motion for the Court to compel the government to inventory and produce all Capitol CCTV in their possession.

Respectfully submitted to the court.

By: William Pope

/s/

William Pope

Pro Se Officer of the Court

Topeka, Kansas

Certificate of Service

I certify that a copy of this was filed electronically for all parties of record on October 4, 2023.

/s/

William Alexander Pope, Pro Se