

STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT COURT

STATE OF NEW MEXICO, ex rel.,
MARCO WHITE, MARK MITCHELL,
and LESLIE LAKIND,

Plaintiffs,

vs.

Case No. D-101-CV-2022-00473

COUY GRIFFIN,

Defendant.

PLAINTIFFS' SECOND REVISED TRIAL EXHIBIT LIST

Plaintiffs may use the following exhibits at trial:

No.	Exhibit
1	Coyu Griffin, Otero County Commission Oath of Office (2018-12-28)
2	Otero County Commission Resolution No. 03-11-21/109-46 ("Soldiers' Monument")
3	Otero County Commission Resolution No. 03-11-21/109-47 ("Opposing the State's Unconstitutional Health Orders")
4	Otero County Commission Resolution No. 04-08-21/109-52 ("Resolution Declaring Otero County To Be 100% Open for Business")
5	County of Otero, New Mexico Regular Meeting Agenda May 12, 2022

6	Resolution No. 05-13-21/109-57 (“Resolution Opposing the Federal Government’s ‘30x30’ Land Preservation Goal”)
7	County of Otero, New Mexico Regular Meeting Agenda June 9, 2022
8	County of Otero, New Mexico Regular Meeting Agenda June 13, 2022
9	County of Otero, New Mexico Regular Meeting Agenda June 17, 2022
10	County of Otero, New Mexico Regular Meeting Agenda July 14, 2022
11	Resolution #09-09-21/110-09 (“Resolution Opposing the State’s Unconstitutional Health Orders”)
12	Senate Report - Examining U.S. Capitol Attack (2021.06.08)
13	GAO Report on Open Source Data from Federal Agencies (2022-05)
14	GAO Report on Capitol Police Response (2022-02)
15	GAO Report on Capitol Police Preparation (2022-03)

16	Jan. 6 Synchronized Video of Upper Plaza/Tunnel 2:27-3:21 pm (2021-01-06)
17	Jan. 6 Unsynchronized Video of Upper Plaza/Tunnel 2:27-3:21 pm (2021-01-06)
17-A	Transcript: Jan. 6 Unsynchronized Video of Upper Plaza/Tunnel 2:27-3:21 pm (2021-01-06)
17-B	Original: Jan. 6 Unsynchronized Video of Upper Plaza/Tunnel 2:27-3:21 pm (2021-01-06)
18	Jan. 6 Synchronized Video of Upper Plaza/Tunnel 2:51-3:23 pm (2021-01-06)
19	Jan. 6 Synchronized Video of Upper Plaza/Tunnel 3:50-4:21 pm (2021-01-06)
20	Jan. 6 Compilation Video from VDARE TV
21	Jan. 6 Video with Capitol in Background (2021-01-06)
22	Jan. 6 Video Griffin in Crowd (2021-01-06)
23	Jan. 6 Video Rioter Yelling (2021-01-06)

23-A	Transcript: Jan. 6 Video Rioter Yelling (2021-01-06)
23-B	Original: Jan. 6 Video Rioter Yelling (2021-01-06)
24	Jan. 6 Video Mention of Arms (2021-01-06)
24-A	Transcript: Jan. 6 Video Mention of Arms (2021-01-06)
24-B	Original: Jan. 6 Video Mention of Arms (2021-01-06)
25	Jan. 6 Video Griffin Jumps Wall (2021-01-06)
25-A	Transcript: Jan. 6 Video Griffin Jumps Wall (2021-01-06)
25-B	Original: Jan. 6 Video Griffin Jumps Wall (2021-01-06)
26	Jan 6. Video Griffin Climbs to West Terrace; Aids Rioter (2021-01-06)
26-A	Transcript: Jan 6. Video Griffin Climbs to West Terrace; Aids Rioter (2021-01-06)

26-B	Original: Jan 6. Video Griffin Climbs to West Terrace; Aids Rioter (2021-01-06)
27	Jan 6. Video of Griffin Livestream on West Terrace in Front of Mob (2021-01-06)
27-A	Transcript: Jan 6. Video of Griffin Livestream on West Terrace in Front of Mob (2021-01-06)
27-B	Original: Jan 6. Video of Griffin Livestream on West Terrace in Front of Mob (2021-01-06)
28	Jan 6. Video of Griffin on West Terrace Overlooking Crowd in Front of Capitol Building (2021-01-06)
29	Jan 6. Video of inaugural stage with Crowd chanting “we the people” (2021-01-06)
30	Jan. 6 Video Rioters Pushed Out (2021-01-06)
31	Jan 6. Video of Griffin with Mob on West Terrace at 3:20 PM (2021-01-06)
32	Jan 6. Video of Crowd Members Moving Down Stairs of Inaugural Platform (2021-01-06)
33	Jan 6. Video with Bullhorn (2021-01-06)

34	Jan 6. Video Crowd at Capitol Entrance (2021-01-06)
34-A	Transcript: Jan 6. Video Crowd at Capitol Entrance (2021-01-06)
34-B	Original: Jan 6. Video Crowd at Capitol Entrance (2021-01-06)
35	Jan 6. Video Crowd Shouting about “Traitors” (2021-01-06)
36	Video of Griffin in front of Capitol on January 5, Discussing Jan 6. Plan (2021-01-05)
36-A	Transcript: Video of Griffin in front of Capitol on January 5, Discussing Jan 6. Plan (2021-01-05)
36-B	Original: Video of Griffin in front of Capitol on January 5, Discussing Jan 6. Plan (2021-01-05)
37	Video Griffin on January 7, Discussing Jan 6 and Plans to Return to DC. (2021-01-07)
38	Early Morning Jan 6. Video (2021-01-06)
38-A	Transcript: Early Morning Jan 6. Video (2021-01-06)

38-B	Original: Early Morning Jan 6. Video (2021-01-06)
39	Jan 6. Video Griffin Talking to Camera about “Ruckus” (2021-01-06)
39-A	Transcript: Jan 6. Video Griffin Talking to Camera about “Ruckus” (2021-01-06)
39-B	Original: Jan 6. Video Griffin Talking to Camera about “Ruckus” (2021-01-06)
40	Video of Otero County Commission Meeting (2021-01-14)
41	Jan 6. Video Griffin Talking to Rioters (2021-01-06)
42	Jan 6. Video Griffin Jumps Wall (2021-01-06)
43	John Erickson Testimony Excerpt of Transcript of the Bench Trial, United States v. Couy Griffin, No. 1-21-cr-92-TNM (D.D.C. Mar. 21, 2022)
44	Lanelle Hawa Excerpt of Transcript of the Bench Trial, United States v. Couy Griffin, No. 1-21-cr-92-TNM (D.D.C. Mar. 21, 2022)
45	Ruling Excerpt of Transcript of the Bench Trial, United States v. Couy Griffin, No. 1-21-cr-92-TNM (D.D.C. Mar. 22, 2022)

46	Sentence Excerpt of Sentencing Transcript of the Bench Trial, United States v. Couy Griffin, No. 1-21-cr-92-TNM (D.D.C. June 17, 2022)
47	Judgment, United States v. Couy Griffin, No. 1-21-cr-92-TNM (D.D.C. June 17, 2022)
48	Capitol Photo (Bird's Eye Satellite View) (2021-01-06)
49	Capitol Photo with Yellow Perimeter (2021-01-06)
50	Capitol Photo with Signs (Area Closed) (2021-01-06)
51	Capitol Photo of Sign Itself (Area Closed) (2021-01-06)
52	Photo of Sign on Rack Outside Capitol (2021-01-06)
53	USCP Footage Compilation (2021-01-06)
54	Footage from a Camera on the West Roof of the Capitol (2021-01-06)
55	Surveillance Footage of Vice President Pence (2021-01-06)

56	Video East Plaza of Capitol Breach (2021-01-06)
57	House Certificate of Authenticity of Domestic Records (2021-12-17)
58	Senate Certificate of Authenticity of Domestic Records (2021-12-10)
59	Stipulation to Jan. 14, 2021 Otero County Commission Meeting Video Exhibit
60	Part of Senate Congressional Record (2021-01-06)
61	Part of House Congressional Record (2021-01-06)
62	Video Griffin Discussing Jan 6. (2021-01-11)
63	Griffin Video "Only Good Democrat is a Dead Democrat" (2020-05-17))
64	Griffin Driving Video (2021-01-07 or 2021-01-08)
65	Griffin Speech in Bowling Green (2021-01-03)

66	Griffin Video “I wear January 6th as a badge of honor.” (2022-03-22)
67	Video Griffin WFAF Speech, Ballot Box or Streets (2021-01-04)
67-A	Transcript: Video Griffin WFAF Speech, Ballot Box or Streets (2021-01-04)
67-B	Original: Video Griffin WFAF Speech, Ballot Box or Streets (2021-01-04)
68	Twitter, @RideWithC4T, “Violence” Reference (2020-07-20)
69	Twitter, @CouyGriffinC4T, “Civil War” Reference (2020-04-01)
70	Twitter, @CouyGriffinC4T, “I hope Trump can win without war” (2020-12-25)
71	Twitter, @CowboyCouy, Fundraising with image of check (2022-05-17)
72	Twitter, @CowboyCouy, WWG1WGA (2022-02-13)
73	Twitter, @realDonaldTrump, Retweet of Cowboys for Trump @RideWithC4T, “JAN 6 # MillionMAGAMarch” (2020-12-27)

74	Twitter, @CouyGriffinC4T, “This can end peaceful or stronger stands can be taken.” (2020-4-30)
75	Twitter, @CouyGriffinC4T, “Hang em high Mr. President!” (2020-5-10)
76	Twitter, @CouyGriffinC4T, References “‘defunding’ all our political leaders security details. ... Maybe we can start with @HillaryClinton security detail.” (2020-6-10)
77	Twitter, @CouyGriffinC4T, retweet “Call in your Sheriff to uphold his oath of office!!!” (2020-11-5)
78	Twitter, @CouyGriffinC4T, “Nobody wants to see this get ugly” (2020-11-5)
79	Twitter, @CouyGriffinC4T, “My phone was confiscated after my arrest on 1/17” (2022-2-12)
80	Twitter, @CowboyCouy, “The ‘Big Lie’ is the Joe Biden Presidency. Period!” (2021-8-31)
81	Twitter, @CowboyCouy, “Trump can get his presidency back ...” (2021-9-8)
82	Twitter, @CowboyCouy, “We are under a military coup currently in America.” (2021-9-29)
83	Twitter, @CowboyCouy, “Patriots Never Quit!!!” (2021-10-5)

84	Twitter, @CowboyCouy, “Justice for J6’ is coming soon!!” (2021-11-10)
85	Twitter, @CowboyCouy, “History will not reflect back on Joe Biden as President” (2021-11-11)
86	Twitter, @CowboyCouy, “I believe J/6 was the spark that ignited this fire today. Hang onto your hat.” (2022-2-12)
87	Twitter, @CowboyCouy, “What about the political prisoners of J/6?” (2022-3-12)
88	Twitter, @CowboyCouy, References to “POW’s” and “WAR CRIME” (2022-3-29)
89	Twitter, @CowboyCouy, Reference to Otero County forensic audit (2022-1-13)
90	Twitter, @CowboyCouy, “Not if we don’t audit our elections on the COUNTY level!” (2022-2-16)
91	Twitter, @CowboyCouy, “Keep your eye on Otero County” retweeting “DECERTIFY” image (2022-5-8)
92	Twitter, @CowboyCouy, “The cover up of Jan 6th is DISGRACEFUL!!” (2022-3-3)
93	Twitter, @CowboyCouy, “How about RELEASE ALL THE POLITICAL PRISONERS FROM J/6 @SenTedCruz!!!” (2022-3-11)

94	Twitter, @CowboyCouy, “Jake Lang is a HERO” (2022-3-16)
95	Twitter, @RideWithC4T, retweet @lindahuiyun “Get Our Country back!” retweet @RideWithC4T “#CowboysforTrump fighting till the end!” (2021-1-7)
96	Twitter, @RideWithC4T, retweet @boshane123 “We’re not going ANYWHERE!!! GOOO TRUMP!!!” (2021-1-7)
97	Facebook, Cowboys For Trump, “You wanna fight? Well not you got it!!! January 20th!!!!” (around 2021-1-16)
98	Twitter, @CowboyCouy, “This is Gods Country!! And Americans are fixing to rise and take it back!!!” (2022-2-4)
99	Twitter, @CowboyCouy, “Biden is an illegal president” (2022-2-11)
100	Twitter, @CowboyCouy, “This is a fight we will not lose!” (2022-2-12)
101	Twitter, @CowboyCouy, “January 6 is the first iron in the fire.” (2022-2-15)
102	Twitter, @CowboyCouy, “Political prisoners tortured on American soil!!!” with image from Capitol (2022-2-15)
103	Twitter, @CowboyCouy, “These political prisoners need to be freed!!!” (2022-2-15)

104	Twitter, @CowboyCouy, “Why would my phone have been taken to this location AFTER my arrest on 1/17? ... It had messages to Trump and @RepMTG” (2022-2-16)
105	Twitter, @CowboyCouy, Tweet thread “Soon we are going to have another rally in Washington DC ... No random violence is never justified. A coordinated war with a clear objective is!” (2022-2-19)
106	Twitter, @CowboyCouy, “And it’s a real shame our DC Republicans don’t fight as hard for political prisoners here at home ...” (2022-3-13)
107	Twitter, @CowboyCouy, “Pisses me off how quiet Trump is about 1/6!” (2022-3-13)
108	Twitter, @CowboyCouy, References “American POW’s” (2022-3-22)
109	Twitter, @CowboyCouy, retweet @Libertyville22 “January 6th was NOT an insurrection ...” (2022-5-18)
110	Twitter, @CowboyCouy, “Isn’t it considered insurrection ...” (2022-5-19)
111	Twitter, @CowboyCouy, “Jacob Lang is an American hero ...” (2022-5-19)
112	Twitter, @CowboyCouy, “Lots of miles. Lots of hard work. All to be quenched by a stolen election!!! Very sad!” (2022-5-21)
113	Twitter, @DirtBikeStar2 tagging @RideWithC4T: Layout of Capitol (2020-12-31)

114	Twitter, @Hackenkall_KAG replying to @RideWithC4T: Operation Occupy the Capitol (2020-12-27)
115	Twitter, @SZheng1967 replying to @RideWithC4T: “America has come to life & death. Occupying Washington, DC, and surrounding Congress and the Supreme Court is the only way to survive” (2021-01-03)
116	Twitter, @OddDNA23 replying to @RideWithC4T: “On Jan 6th Someone needs to haul in a Gallows” (2021-01-04)
117	Twitter, @RideWithC4T “The Cavalry is coming January 6 to # WashingtonDC”; @gpnvonod_ reply: “Grab Our Rifles” (2021-01-01)
118	Twitter, @RideWithC4T, “January 6th DC....FIGHT until we can’t fight anymore either we got the battle won or we’re gone”
119	@RideWithC4T Activity Spike after Trump Retweet
120	Twitter, @voiceofresonn replying to @RideWithC4T: “Lassos ready.God be with you. Takeback our capital” (2021-01-05)
121	Twitter, @RideWithC4T “stop the overthrow of the American government by the Chinese communist government” (2021-01-05)
122	Twitter, @MarkMetts3 reply to tweet @RideWithC4T tagged in: “THE STAGE IS SET AND THE BATTLE FORMED” (2021-01-03)
123	Twitter, @BrexitMapman_ replying to @RideWithC4T “live free or fight until the end”: March on Congress Jan 6th (2020-12-26)

124	Twitter, @RideWithC4T: “We are going to get our nation back” (2021-01-04)
125	@CouyGriffinC4T Activity Chart
126	Twitter, @CouyGriffinC4T “DECLARE MARTIAL LAW” (2020-12-18)
127	Twitter, @CouyGriffinC4T, “If Democrats think they can steal our election and patriots are going to quietly go away you have gravely underestimated the spirit of the American People!!! We Will Not Be Beat!!!!” (2020-11-05)
128	Twitter, @realDonaldTrump_ @RideWithC4T, @michsnyder45 Jan. 6 March on Congress (2020-12-27 and 2020-12-28)
129	Twitter, @lochard24 tagging @RideWithC4T, “FIGHT BACK.” “A couple million people surrounding the White house will scare the hell out of the Swamp creatures” (2020-12-28)
130	Twitter, @realDonaldTrump_ retweets @RideWithC4T (2020-05-27)
131	GiveSendGo: “Help Couy Griffin of Cowboys for Trump” Fundraiser by Bergquam
132	GiveSendGo: "Couy Griffin" Fundraiser by Keshel
133	Order from Hearing, Kourtne Griffin v. Couy Griffin, D-1215-DM-2019-310 (N.M. 12 Jud. Dist. July 14, 2020)

134	Otero County Resolution No. 2022-07-14/111-08
135	Cowboys For Trump LLC Registration (Latest Filing: 2021-06-24)
136	January 6 Select Committee Compilation Video Exhibit (2022-06-09)
137	Jan. 6 Video Crowd Pushing Into Building (2021-01-06)
137-A	Transcript: Jan. 6 Video Crowd Pushing Into Building (2021-01-06)
137-B	Original: Jan. 6 Video Crowd Pushing Into Building (2021-01-06)
138	Jan. 6 Video Griffin Talking on Phone (2021-01-06)
139	Jan. 6 Video Protestors Scaling Wall, Griffin Audio (2021-01-06)
140	Floor of House of Representatives Throughout Attack, Montage Timestamped (2021-01-06)
141	Jan. 6 Video, Griffin on Balcony with Bullhorn (2021-01-06)

142	Jan. 6 Video, Griffin Talking to Rioter, "Fight Our Way" (2021-01-06)
143	Def.'s Resp. to Pl.'s Interrog. No. 1., July 30, 2022
144	Def.'s Resp. to Pl.'s Interrog. No. 2., Aug. 2, 2022
145	J. Wilkinson, EOUSA Exhibit Declaration; CREW v. DOJ (D.D.C.), 1:22-cv-01132-FYP (2022-06-24)
146	Twitter, Couy Griffin, @RideWithC4T, Video of Griffin at Capitol, "Fighting Till the End!" (2021-01-06)
147	Original: Officer Daniel Hodges Body Camera Video (2021-01-06 1:50pm - 2:57pm)
147-A	Transcript: Officer Daniel Hodges Body Camera Video (2021-01-06 1:50pm - 2:57pm)
147-B	Clip 1: Officer Daniel Hodges Body Camera Video from Jan. 6 (captioned)
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148	Video of Officer Daniel Hodges Attacked in Capitol Tunnel (2021-01-06, approx. 3:10-3:13pm)
148-A	Transcript: Video of Officer Daniel Hodges Attacked in Capitol Tunnel (2021-01-06, approx. 3:10-3:13pm)
148-B	Original: Video of Officer Daniel Hodges Attacked in Capitol Tunnel (2021-01-06, approx. 3:10-3:13pm)

149	Griffin WFAF Speech, Discusses Elected Office & Martial Law (2021-01-01)
150	Video Griffin Stop the Steal Organizing (2020-11-07)
151	Video Griffin Discussing Jan. 6, Police Fired First (~2021-01-08)
152	Video Griffin Discusses Seeing Violence and Destruction at Capitol
152-A	Transcript: Video Griffin Discusses Seeing Violence and Destruction at Capitol
152-B	Original: Video Griffin Discusses Seeing Violence and Destruction at Capitol
153	Video Griffin Discusses Seeing Push into Capitol, "Heave! Ho!" Chant
153-A	Transcript: Video Griffin Discusses Seeing Push into Capitol, "Heave! Ho!" Chant
153-B	Original: Video Griffin Discusses Seeing Push into Capitol, "Heave! Ho!" Chant
154	Video Gun on Griffin Dashboard, Driving to D.C. for Jan. 6

155	Video Griffin Loads Gun into Rented Escalade
156	Video Griffin Discussing Stop the Steal, Pistol in Car
157	Video Griffin Discussing Seeing Action on the Inside of Capitol on Jan. 6
158	Video Griffin Discussing Oath of Office
159	Video Griffin in Roanoke, Gives Full Recap of Jan. 6 Events (2021-01-06)
160	Video Griffin Riding Horse in D.C., Watches Proud Boys Walk By
160-A	Transcript: Video Griffin Riding Horse in D.C., Watches Proud Boys Walk By
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163	Video Griffin WFAF Speech Leaving Houston, Urging Jan. 6 D.C. or State Capitols
164	Video Griffin WFAF Speech Monroe, LA, Martial Law, Urging Jan. 6 D.C. or State Capitols
165	Video Griffin WFAF Speech Little Rock, AK, Urging Jan. 6 D.C. (2021-01-02)
166	Video Griffin WFAF Speech Missouri, Moving Forward to D.C.
167	Full Video Griffin WFAF Speech Bowling Green, KY, Stolen Election, War, Jan. 6, Sacrificing Lives (see Exhibit 65) (2021-01-03)
168	Video Griffin WFAF Speech Franklin, TN, War, Urging Jan. 6 D.C. (2021-01-03)
169	Video Griffin in Columbia, TN, Stolen Election, Urging Jan. 6 D.C.
169-A	Transcript: Video Griffin in Columbia, TN, Stolen Election, Urging Jan. 6 D.C.

169-B	Original: Video Griffin in Columbia, TN, Stolen Election, Urging Jan. 6 D.C.
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170-B	Original: Video Griffin in Birmingham, AL, Militias & Sheriffs (2021-01-03)
171	Video Griffin Livestream in Georgia, Urging Jan. 6 D.C. In Case of Battle (2021-01-04)
172	Video Griffin in Hagerstown, MD, Urging Jan. 6 D.C., Nation Armed, All Things Possible (~2021-01-04)
173	Video Griffin On Way to D.C., War, Election Fraud, Pay Any Cost (~2021-01-05)
173-A	Transcript: Video Griffin On Way to D.C., War, Election Fraud, Pay Any Cost (~2021-01-05)
173-B	Original: Video Griffin On Way to D.C., War, Election Fraud, Pay Any Cost (~2021-01-05)
174	Video Griffin Discussing "Dead Democrat" Remark (2021-01-05)

174-A	Transcript: Video Griffin Discussing "Dead Democrat" Remark (2021-01-05)
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175	Video Griffin in Oklahoma, Outside Air Force Base, Military Protect from Tyranny (~2021-01-09)
175-A	Transcript: Video Griffin in Oklahoma, Outside Air Force Base, Military Protect from Tyranny (~2021-01-09)
175-B	Original: Video Griffin in Oklahoma, Outside Air Force Base, Military Protect from Tyranny (~2021-01-09)
176	Video Griffin Driving in TX, Discussing Violence at Capitol, Embrace 2nd Amendment on Jan. 20th (~2021-01-09)
177	Video Griffin Discussing Stolen Election, Fight Back, Urges State Capitol
178	Video Car Rental Footage
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183	Video Griffin, "She's Coming and Hell is Coming With Us", Mike Pence
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184	Video Griffin at Security Check, Looking at Restricted Area Sign (2021-01-06)
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189	Video Griffin Interview Discussing Jan. 6, Three Ft. from Inauguration Location
190	Video Griffin Interview Discussing Jan. 6, Jan. 20, "Blood Would Run from Captiol" Statements
190-A	Transcript: Video Griffin Interview Discussing Jan. 6, Jan. 20, "Blood Would Run from Captiol" Statements
190-B	Original: Video Griffin Interview Discussing Jan. 6, Jan. 20, "Blood Would Run from Captiol" Statements

191	Video Griffin Interview Discussing Jan. 6, Jan 7. Roanoke Video, Election Fraud
192	Video Griffin in San Diego Visiting Ashli Babbitt's Parents, Discussing Jan. 6, Jan. 20
193	Video Griffin Traveling from San Diego to D.C., Hopes Patriots Join Fight
194	Video Griffin, War, Give Up Life for Freedom
195	Video Griffin, Calls on Sheriffs Valid Election
196	Video Griffin, Election Fraud Treasonous Crime
197	Video Griffin Speech, Little Rock, AK State Capitol, Charging to Washington, Losing Not an Option
198	Video Griffin WFAF Event, Everything to Win, Any Card on Table
199	Video Griffin WFAF Event, Stolen Election
200	Video Griffin WFAF Rally, Nation at War

201	Video Griffin Discussing C4T & Oval Office Visit, Martial Law
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203-A	Transcript: Video Griffin Discussing County Commissioner, Policy & Overall Operations
203-B	Original: Video Griffin Discussing County Commissioner, Policy & Overall Operations
204	Video Griffin WFAF Rally, Might Lose Our Lives
205	Video Griffin Leaving N.M., Jericho March (~2020-12-04)
206	Video Griffin Arriving in D.C., Jericho March (2020-12-11)

207	Video Griffin WFAF Event, Urging Jan. 6 D.C. (2021-01-04)
208	Photo of Griffin on Inaugural Structure with Bullhorn Yelling to Crowd (1) (2021-01-06)
209	DELETED
210	Photo of Griffin on Inaugural Structure with Bullhorn Yelling to Crowd (2021-01-06)
211	DELETED
212	DELETED
213	DELETED
214	DELETED
215	Jan. 6 Photo Crowd Stepping Over Barrier (2021-01-06)
216	Jan. 6 Photo Crowd Stepping Over Barrier (2) (2021-01-06)

217	Jan. 6 Photo Crowd at Capitol, Scaffolding, Flags (2021-01-06)
218	Jan. 6 Photo Crowd Pushing Police (2021-01-06)
219	Jan. 6 Photo Crowd Against Barricades (2021-01-06)
220	Jan. 6 Photo Officer with Spray on Inaugural Structure (2021-01-06)
221	Jan. 6 Photo Griffin on Inaugural Structure (2021-01-06)
222	Photo of Griffin on Inaugural Structure next to Jacob Lang (2) (2021-01-06)
223	Photo of Griffin on Inaugural Structure next to Jacob Lang (3) (2021-01-06)
224	Jan. 6 Photo Crowd on Inaugural Structure, Griffin Looking Toward Tunnel (2021-01-06)
225	Jan. 6 Photo Crowd on Inaugural Structure, Griffin Looking Toward Tunnel (2) (2021-01-06)
226	Jan. 6 Photo Crowd on Inaugural Structure, Griffin Looking Toward Tunnel (3) (2021-01-06)

227	Jan. 6 Photo Crowd on Inaugural Structure, Griffin Looking Toward Tunnel (4) (2021-01-06)
228	Jan. 6 Photo Crowd on Inaugural Structure, Griffin Looking Toward Tunnel (5) (2021-01-06)
229	Jan. 6 Photo Crowd on Inaugural Structure, Griffin Looking Toward Tunnel (6) (2021-01-06)
230	Jan. 6 Photo Crowd on Inaugural Structure, Griffin Looking Toward Tunnel (7) (2021-01-06)
231	Jan. 6 Photo Crowd in Tunnel (2021-01-06)
232	Jan. 6 Photo Crowd in Tunnel (2) (2021-01-06)
233	Jan. 6 Photo Crowd in Tunnel, Smoke, 1776 Sign (2021-01-06)
234	Jan. 6 Photo Crowd on Inaugural Stage, Smoke (2021-01-06)
235	Jan. 6 Photo Rioters Covering Mouths at Tunnel (2021-01-06)
236	Jan. 6 Photo Smoke Over Inaugural Structure (2021-01-06)

237	Jan. 6 Photo Capitol Officers and Rioters (2021-01-06)
238	Jan. 6 Photo Rioter Surrounded by Officers (2021-01-06)
239	Jan. 6 Photo Rioter Surrounded by Officers (2) (2021-01-06)
240	Jan. 6 Photo Close Up Rioters Fighting Officers (2021-01-06)
241	Jan. 6 Photo Rioter with Bullhorn Surrounded by Officers (2021-01-06)
242	Jan. 6 Photo Officers with Gas Masks and Batons (2021-01-06)
243	Jan. 6 Photo Military with Riot Shields (2021-01-06)
244	Jan. 6 Video Rioters on Scaffolding, Griffin Audio (2021-01-06)
245	Article, Santa Fe New Mexican: Angry Trump Supporters Protest Election Outcome at Roundhouse (2020-11-07)
246	Article, KUNM, Counter-Protestors Antagonize Black New Mexico Movement Rally In Rio Rancho (2020-09-14)

247	Article, Santa Fe New Mexican: Trump Supporters Protest Election Outcome at Roundhouse (2020-11-21)
248	Article, Albuquerque Journal, Undeterred by Lost Election, Supporters of President Trump Demonstrate on West Central (2020-11-14)
249	Article, The Daily Beast, Anti-Lockdown Protesters Now Calling for Dems to Die (2020-05-27)
250	Griffin Deposition Transcript, July 20, 2022
251	Struck Deposition Transcript, July 27, 2022
252	Struck Deposition Transcript, Aug. 5, 2022

Plaintiffs reserve the right to introduce documents identified or produced by the parties or third parties in discovery, including interrogatory answers, responses to requests for production, and responses to requests for admission. Plaintiffs also identify herein and reserve the right to use any and all exhibits identified, referenced or selected by any other party to this matter.

Plaintiffs reserve the right to introduce documents or evidence that may be used for impeachment or rebuttal purposes.

Plaintiffs reserve the right to amend or modify this list pending rulings by the Court on pending motions.

Respectfully submitted,

FREEDMAN BOYD HOLLANDER
& GOLDBERG, P.A.

/s/ Joseph Goldberg
Joseph Goldberg
20 First Plaza NW, Suite 700
Albuquerque, NM 87102
P: 505.842.9960, F: 505.944.8060
jg@fbdlaw.com

Christopher A. Dodd
Dodd Law Office, LLC
20 First Plaza NW, Suite 700
Albuquerque, NM 87102
P: 505.475.2742
chris@doddnm.com

Amber Fayerberg
Law Office of Amber Fayerberg
2045 Ngunguru Road
Ngunguru, 0173, New Zealand
P: +64 27 505 5005
amber@fayerberglaw.com

Noah Bookbinder*
Donald Sherman*
Nikhel Sus*
Stuart McPhail*
Citizens for Responsibility and Ethics in
Washington
1331 F Street NW, Suite 900
Washington, DC 20004
P: 202.408.5565
nbookbinder@citizensforethics.org
dsherman@citizensforethics.org
nsus@citizensforethics.org
smcphail@citizensforethics.org
**Pro Hac Vice*

Daniel A. Small*
Cohen Milstein Sellers & Toll PLLC
1100 New York Avenue, NW
Fifth Floor
Washington, DC 20005
P: 202.408.4600
dsmall@cohenmilstein.com
**Pro Hac Vice*

Counsel for Plaintiffs

Certificate of Service

I HEREBY CERTIFY that on August 10, 2022, I filed the foregoing electronically through the New Mexico Odyssey File & Serve system, which caused all counsel of record to be served by electronic means. This notice was also served upon Defendant Couy Griffin by email and one-day Federal Express at the following address:

Couy Griffin



/s/ Joseph Goldberg
Joseph Goldberg

Counsel for Plaintiffs