

**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

**MOTION TO REMOVE DESIGNATION OF ‘SENSITIVE’ FROM
UNDERCOVER MPD VIDEOS AND RELEASE THEM TO THE PUBLIC**

In my attempt to gain the full access to discovery needed to vigorously defend myself in court, it was necessary for me to share exhibits that clearly demonstrate that claims made by the government (claims that there were no undercover government provocateurs at the Capitol on January 6) were false. One of those exhibits (a video clip of an undercover MPD officer who was joining the crowd in chants of “Drain the swamp!” and “Whose house? Our house!” and repeatedly urging protestors to advance up the northwest steps to the Capitol) could not be shared publicly because the government has designated it as ‘sensitive’ and hidden it under seal. Since I always follow this court’s protective order governing the handling of sensitive and highly sensitive discovery, I could only share that with this honorable court as a sealed exhibit.

However, since my recent filing (ECF No. 81) has attracted considerable public attention, and since major news organizations are now contacting me asking about the undercover MPD video (which I submitted as a sealed exhibit for ECF No. 72), I believe it is best that this honorable court now publicly release this sealed exhibit in support of my motion.

While my descriptions of the undercover MPD officers are accurate, the media and the public should not have to rely on my descriptions alone. It is in the interests of justice that this exhibit in support of my motion be seen by all.

It would also serve the interests of justice and completeness for this court to release the broader video recorded by the undercover officer. Therefore, in addition to asking this court to remove the government's 'sensitive' designation on the exhibit I submitted for my previous filing (ECF No. 72), I am also motioning this court to remove the 'sensitive' designation from the five files that make up the full undercover MPD video. For completeness, I am submitting those as sealed exhibits to this motion.

To provide the context for when Officer 1 (who was dressed in goggles, a dark jacket and a vertically striped face gaiter) was on the stairs, I have also included a sealed exhibit syncing Officer 1's video to CCTV footage of the northwest steps from around 2:24 p.m. This exhibit is also of public interest because it shows other defendants in close proximity to Officer 1, including Ethan Nordean, who is on trial now.

In total, the sealed exhibits this motion seeks to release are:

1. MPD-005-00000032_CAPD000003743.mp4
2. MPD-005-00000033_CAPD000003744.mp4
3. MPD-005-00000034_CAPD000003745.mp4
4. MPD-005-00000035_CAPD000003746.mp4
5. MPD-005-00000036_CAPD000003747.mp4
6. ECF 72 Exhibit – Undercover MPD.mp4
7. Stairs Sync Officer 1.mp4

I am also including three non-sensitive bodycam exhibits in this motion for public release. Publicly available footage¹ shows Officer 2 and Officer 3 right behind Ashli Babbitt near the top of the northwest stairs. However, that footage only shows the back of Mrs. Babbitt. To put questions to rest regarding the proximity of Mrs. Babbitt to the undercover officers at around 14:21:50, I am including body worn camera footage² from officers Dowling³, Leslie⁴, and Perez⁵. The fact that Mrs. Babbitt appeared emotional charged by the time she reached the top of the steps could indicate that undercover government operatives influenced her behavior through their repeated chants and urgings to advance up the steps towards the Capitol.



Figure 1: An image taken from Officer Downing's body worn camera shows the proximity of Ashli Babbitt circled in blue to undercover MPD officers circled in red. This bodycam video confirms other publicly available footage of this scene.

¹ The undercover officers can be seen near Mrs. Babbitt at the 1:45 mark of this publicly available video:

<https://ia904700.us.archive.org/26/items/7KkqYoKFqnsbynahS/7KkqYoKFqnsbynahS.mpeg4>

² These files have not been designated by the government as materials subject to the protective order and should be considered by the court as supplemental exhibits in support of my previous filing (ECF No. 81).

³ Exhibit 8 is not considered a material subject to the protective order and can be accessed at:

<https://rumble.com/v2ad14y-exhibit-bodycam-footage-from-officer-michael-downing.html>

⁴ Exhibit 9 is not considered a material subject to the protective order and can be accessed at:

<https://rumble.com/v2adcd4-exhibit-bodycam-footage-from-officer-jeffrey-leslie.html>

⁵ Exhibit 10 is not considered a material subject to the protective order and can be accessed at:

<https://rumble.com/v2ad8di-exhibit-bodycam-footage-from-officer-ricardo-perez.html>

Since the public interest and concern regarding these exhibits is understandably high, and since the government has already hidden these important facts from the America people for more than two years, I ask this honorable court to grant this motion as soon as possible.

WHEREFORE I, William Alexander Pope, respectfully request that this motion be granted.

Respectfully Submitted,

By: William Pope

/s/
William Pope
Pro Se Officer of the Court

Certificate of Service

I certify that a copy of the forgoing was filed electronically for all parties of record on this 21st day of February, in the year of our Lord, 2023.

/s/
William Alexander Pope, Pro Se