

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

DONALD J. TRUMP,

Defendant.

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CRIMINAL NO. 23-cr-257 (TSC)

GOVERNMENT’S SUMMARY OF ANTICIPATED EXPERT TESTIMONY

The Government has provided its Notice of Expert Witnesses to the defendant. Pursuant to the Pretrial Order, ECF No. 39 ¶ 7, the Government now submits to the Court “a brief description of each [expert] witness’ area of expertise and expected testimony.” As explained below, the Government may call up to three expert witnesses to testify in this case.

Expert 1

Expert 1 has knowledge, skill, experience, training, and education beyond the ordinary lay person regarding the interpretation and visual representation of geographic location data. The Government expects that Expert 1 will testify about his/her use of ArcGIS (Geographic Information Systems) software to create a map of the Google location history data produced in response to a search warrant. Specifically, Expert 1 plotted the location history data for Google accounts and devices associated with individuals who moved, on January 6, 2021, from an area at or near the Ellipse to an area encompassing the United States Capitol building. His/her testimony will describe and explain the resulting graphical representations of that data, and it will aid the jury in understanding the movements of individuals toward the Capitol area during and after the defendant’s speech at the Ellipse.

Expert 2

Expert 2 has knowledge, skill, experience, training, and education beyond the ordinary lay

person regarding the analysis of location data and location history data, including Google location history data, to determine the approximate location at which a device with Google location history activated was used at a particular time or range of times. The Government expects that Expert 2 will testify about: the process of determining device location; the collection and use of location history data by Google, LLC; and location history data produced in response to a search warrant and included in the graphical representation prepared by Expert 1. His/her testimony will aid the jury in understanding the movements of individuals toward the Capitol area during and after the defendant's speech at the Ellipse.

Expert 3

Expert 3 has knowledge, skill, experience, training, and education beyond the ordinary lay person regarding the analysis of cellular phone data, including the use of Twitter and other applications on cell phones. The Government expects that Expert 3 will testify that he/she: (1) extracted and processed data from the White House cell phones used by the defendant and one other individual (Individual 1); (2) reviewed and analyzed data on the defendant's phone and on Individual 1's phone, including analyzing images found on the phones and websites visited; (3) determined the usage of these phones throughout the post-election period, including on and around January 6, 2021; and (4) specifically identified the periods of time during which the defendant's phone was unlocked and the Twitter application was open on January 6.

Respectfully submitted,

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