

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

UNITED STATES OF AMERICA	)	
	)	
	)	
v.	)	CRIMINAL NO. 21-CR-642(JDB)
	)	
	)	
DARRELL NEELY	)	

**DEFENDANT’S MOTION IN LIMINE**

Mr. Darrell Neely, through his attorney, Kira Anne West, respectfully files this motion *in limine* and states the following in support:

The following should not be mentioned or alluded to in the trial of this case:

1. Any news reports during and after January 6, 2021 that mention police personnel that died. Mr. Neely had no role in that.
2. Any reference to President Trump’s (hereinafter “Trump”) stop the steal lawsuits, court challenges, or issues raised by Trump’s lawyers about the election and outcomes of those lawsuits. Mr. Neely is not an attorney and the legal significance of any lawsuits brought by parties, unrelated to Mr. Neely, to challenge the elections is irrelevant to Mr. Neely’s conduct on January 6, 2021 and should be excluded.

3. Any reference to the proud boys, patriot boys, three percenters or oath keepers. This includes any information regarding the Oath Keepers using a hotel in Virginia to stage weapons in the event that martial law was declared on January 6, 2021. There is not one scintilla of evidence that Mr. Neely knew of this operation or was a member of any of these groups. He is a member of the U.S. Marines and not any of these organizations.
4. Any photos taken from Mr. Neely's phone that are irrelevant to this case. This may go on a photo by photo basis. Any photographs not related to the events of January 6<sup>th</sup> including but not limited to Mr. Neely's personal life.
5. Any reference to Mr. Neely's prior and negligible criminal history.
6. Mr. Neely's mug shot.
7. Any "tags" from or anyone else on Facebook or any other social media or radio programs not related to January 6, 2021.
8. Any information about relationship with his ex-wife.
9. Any information about marijuana use.
10. Mr. Neely's home address.

Respectfully submitted,

KIRA ANNE WEST

By: \_\_\_\_\_ /s/

Kira Anne West  
DC Bar No. 993523  
712 H Street N.E., Unit 509  
Washington, D.C. 20002  
Phone: 202-236-2042  
kiraannewest@gmail.com  
Attorney for Mr. Neely

**CERTIFICATE OF SERVICE**

I hereby certify on the 8th day of August, 2022, a copy of same was delivered to the parties of record, by ECF pursuant to the Covid standing order and the rules of the Clerk of Court.

\_\_\_\_\_  
/S/

Kira Anne West