

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

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 21-cr-00303-ABJ</b>
	)	
<b>DEBORAH LEE</b>	)	
	)	
<b>Defendant</b>	)	

**DEFENDANT DEBORAH LEE'S MOTION *IN LIMINE*  
POSSIBLE SENTENCE**

John M. Pierce  
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*Attorney for Defendant*

NOW COMES Defendant DEBORAH LEE, by and through her counsel of record, John M. Pierce, Esq., and respectfully request this Honorable Court issue an *in limine* Order to preclude the government from making any reference, in argument or otherwise at trial, regarding the potential sentences and potential forfeiture that could be imposed in this case should one or more defendants be found guilty. Such references have no relevance to the issue of guilt or innocence and would serve only to inflame and prejudice the jury. Since such references have no probative value and are unduly prejudicial to the defendant and misleading and confusing to the jury, they should not be allowed.

Date: June 13, 2022

Respectfully submitted,

/s/ John M. Pierce

John M. Pierce

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**CERTIFICATE OF SERVICE**

I, John M. Pierce, hereby certify that on this day, June 14, 2022, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

/s/ John M. Pierce  
John M. Pierce