

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	CRIMINAL NO. 1:21-cr-00303-ABJ-2
v.	:	
	:	
DEBORAH LYNN LEE,	:	
	:	
Defendant.	:	

**GOVERNMENT’S RESPONSE TO THE DEFENDANT’S MOTION IN LIMINE  
REGARDING POSSIBLE PUNISHMENT**

The United States of America, by and through its undersigned counsel, hereby files this response to the defendant’s motion *in limine* regarding arguments about possible punishment. (ECF No. 69.) The government agrees that the potential punishment that the defendant may face has no bearing on her guilt or innocence and should not be the subject of argument before the jury. But the motion should nonetheless be denied as moot because the parties are already restricted from arguing about punishment, and this is addressed by a standard jury instruction. *See* Redbook 2.505. Granting or denying this motion will have no effect on the parties’ obligations.

Respectfully submitted,

MATTHEW M. GRAVES  
United States Attorney  
D.C. Bar No. 481052

By: /s/ Michael J. Romano  
MICHAEL J. ROMANO  
IL Bar No. 6293658  
Trial Attorney, Detailee  
555 4<sup>th</sup> Street, N.W.  
Washington, D.C. 20530  
Telephone No. (202) 307-6691  
[michael.romano@usdoj.gov](mailto:michael.romano@usdoj.gov)