



The Joint Pretrial Statement was filed in this matter on May 5, 2023. That Joint Pretrial Statement included the Government's exhibit list. That list was not provided to the Defendant prior to that filing. The Defendant now seeks leave to object to those exhibits lately identified by the Government in advance of trial.

The objections are to several Facebook posts or chats obtained by the government, a photograph of one of several items seized from Ms. Eicher's home, two montage videos, and several open source videos. The objections to the photograph, the Facebook material, and the montage videos are based on Rules 401 and 403. The objections to the open source videos are based on Rules 901 and 902.

Respectfully Submitted,

**Jolene Eicher**  
By Counsel

JUVAL O. SCOTT  
Federal Public Defender  
Western District of Virginia

**Matthew Hill**  
Assistant Federal Public Defender  
Missouri State Bar No. 47889  
New Hampshire State Bar No. 18864  
Arkansas State Bar No. 2018170  
Attorney for the defendant  
Federal Public Defender's Office  
201 Abingdon Place  
Abingdon, VA 24211  
Telephone: (276) 619-6086  
Fax: (276) 619-6090  
[matt\\_hill@fd.org](mailto:matt_hill@fd.org)

**Certificate of Service**

The undersigned hereby certifies that this document was filed electronically and a copy will automatically be sent to all counsel of record by the CM/ECF system.

*/s/ Matthew Hill*