

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

UNITED STATES OF AMERICA

v.

JOLENE EICHER,

Defendant.

Criminal Action No. 22-38 (BAH)

Judge Beryl A. Howell

**ORDER**

Upon consideration of defendant’s Notice of Public Authority Defense (“Def.’s Notice”), ECF No. 48, the government’s Motion *in Limine* to Preclude Argument or Evidence About Public Authority, ECF No. 51, the related memoranda in support and in opposition, and the entire record herein, for the reasons set forth in the accompanying Memorandum Opinion, it is hereby—

**ORDERED** that the government’s Motion *in Limine* to Preclude Argument or Evidence About Public Authority, ECF No. 51, is **GRANTED**.

**SO ORDERED.**

Date: May 23, 2023

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BERYL A. HOWELL  
U.S. District Judge