

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

**UNITED STATES OF AMERICA** :  
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 :  
 **v.** : **Case No. 21-cr-26 (CRC)**  
 :  
 **CHRISTOPHER MICHAEL ALBERTS,** :  
 :  
 **Defendant.** :

**GOVERNMENT’S MOTION FOR LEAVE TO FILE MOTIONS IN LIMINE**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully requests leave to file motions in limine beyond the December 22, 2022 deadline contained in the Court’s September 30, 2022 Pre-Trial Order, ECF No. 71 at ¶ 4. Because the Court has granted Defendant’s motion to continue trial, and based on Defendant Christopher Alberts’s 286-item Exhibit List and recent public statements, good cause exists to permit the United States to move in limine to exclude evidence and argument that is misleading, unduly prejudicial, and irrelevant in determining Alberts’s guilt of the nine offenses charged in the Second Superseding Indictment, and for other purposes related to the trial of this action. Accordingly, the Government requests the Court permit it to file motions in limine, and to consider such motions at or before the pre-trial conference.

Counsel for the United States requested Defendant’s consent for the relief sought in this motion by email correspondence on February 22, 2023, but counsel for Defendant has not indicated whether he assents to, or opposes, the relief sought herein.

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Dated: March 1, 2023

Respectfully Submitted,

MATTHEW M. GRAVES  
United States Attorney  
DC Bar No. 481052

/s/ Jordan A. Konig  
JORDAN A. KONIG  
Supervisory Trial Attorney, Tax Division,  
U.S. Department of Justice  
Detailed to the U.S. Attorney's Office  
For the District of Columbia  
P.O. Box 55, Washington, D.C. 20044  
202-305-7917 (v) / 202-514-5238 (f)  
[Jordan.A.Konig@usdoj.gov](mailto:Jordan.A.Konig@usdoj.gov)

/s/ Samuel S. Dalke  
SAMUEL S. DALKE  
Assistant U.S. Attorney  
Middle District of Pennsylvania  
Detailed to the U.S. Attorney's Office  
For the District of Columbia  
P.O. Box 55, Washington, D.C. 20044  
717-515-4095  
[Samuel.S.Dalke@usdoj.gov](mailto:Samuel.S.Dalke@usdoj.gov)