

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 1:21-CR-00312 (JEB)
	:	
BRADLEY STUART BENNETT	:	
	:	
Defendant.	:	

**REPLY IN SUPPORT OF MOTION IN LIMINE
REGARDING EVIDENCE ABOUT THE SPECIFIC
LOCATIONS OF U.S. CAPITOL POLICE SURVEILLANCE CAMERAS**

The Government moved to restrict the presentation of evidence regarding the specific position of U.S. Capitol Police surveillance cameras and the maps used to locate the cameras. ECF No. 106. In response, Bennett seeks to reserve the right to raise the issue should he develop evidence are “relevant and necessary to his defense at trial.” ECF No. 113 at 2. To balance these concerns, the Court should “preclude the defense from questioning witnesses about the precise location of Capitol Police cameras,” but “allow for the possibility of an *in camera* proceeding” should Bennett “believe that presentation of such locations becomes necessary during trial.” *United States v. Bru*, No. 21-cr-352, 2023 WL 4174293, at *2 (D.D.C. June 26, 2023) (Boasberg, J.); *see also*, *United States v. Zink*, No. 210-cr-0191, 2023 WL 5206143, at *2 (D.D.C. Aug. 14, 2023) (Boasberg, J.) (“The Court will accordingly preclude the defense from questioning witnesses about the precise location of Capitol Police cameras but will allow *in camera* proceedings should Zink establish that presentation of such locations becomes necessary during trial.”); *United States v. Mock*, No. 21-cr-444, 2023 WL 3844604, at *2 (D.D.C. June 6, 2023) (same).

Bennett also requested a copy of relevant maps with the camera positions deleted. ECF No. 113 at 2. The government provided this map prior to this filing and therefore the defendant's argument on this issue should be rendered moot.


CONCLUSION

For these reasons, the United States requests that this court enter an order, as described above, limiting the presentation of evidence about the precise locations of Capitol Police surveillance cameras, including through the use of Capitol Police maps. If this court determines an evidentiary hearing is necessary to rule on this motion, the government asks that the hearing be held *in camera*.

Respectfully submitted,

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