

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

**UNITED STATES OF AMERICA,**

**v.**

**CASE NO. 1:21-CR-00421-JDB**

**JOHN MARON NASSIF,**

**DEFENDANT.**

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**RESPONSE TO GOVERNMENT’S MOTION IN LIMINE  
REGARDING EVIDENCE OF SPECIFIC LOCATIONS OF  
U.S. CAPITOL POLICE SURVEILLANCE CAMERAS**

The Defendant, John Maron Nassif, hereby replies to the government’s motion in limine to exclude “evidence regarding the specific position of U.S. Capitol Police surveillance cameras.” Doc. 50.

The Defendant does not intend to present evidence about the specific locations of Capitol Police surveillance cameras. In its motion, the government suggests that the Defendant can “. . . probe what Capitol Police cameras show, and what they don’t, by asking about the general location of each camera.” Doc. 50, pg. 4. The undersigned concedes that this proposal should be sufficient to allow effective cross examination of government witnesses. If at any time the undersigned believes that it is necessary to disclose the locations of specific Capitol Police surveillance cameras, it would seek permission from the Court, outside the presence of the jury, before attempting to elicit any such information.

Respectfully submitted,

A. Fitzgerald Hall  
Federal Defender, MDFL

/s/ James T. Skuthan  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 2, 2022, I electronically filed the foregoing via this Court's CM/ECF system, which will send notice of such filing to all counsel of record.

/s/ James T. Skuthan  
James T. Skuthan, Esq.  
Attorney for Defendant