

**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.

**RESPONSE TO GOVERNMENT'S MOTION IN LIMINE
REGARDING CROSS-EXAMINATION OF
U.S. SECRET SERVICE WITNESSES**

The Defendant, John Maron Nassif, hereby replies to the government's motion in limine to regarding cross-examination of U.S. Secret Service witnesses. Doc. 49.

In its motion, the government requests that the Defendant be foreclosed from questioning witnesses about the following:

1. Secret Service protocols related to the locations where protectees or their motorcades are taken at the Capitol or other government buildings where emergencies occur;
2. Details about the nature of Secret Service protective details, such as the number and type of agents the Secret Service assigns to protectees. Doc. 49, p. 2.

The undersigned does not intend to cross examine the Secret Service agents about the two topics listed above.

Respectfully submitted,

A. Fitzgerald Hall
Federal Defender, MDFL

/s/ James T. Skuthan
James T. Skuthan
First Assistant Federal Defender
Florida Bar No. 0544124
201 South Orange Avenue, Suite
300 Orlando, FL 32801
Telephone: 407-648-6338
Fax: 407-648-6095
E-Mail: jim_skuthan@fd.org

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