

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

UNITED STATES OF AMERICA :
 :
 v. : **Criminal Case No.**
 :
 DANIEL PAUL GRAY, : **1:21-cr-00495-ABJ**
 :
 Defendant :

**DEFENDANT’S MOTION IN LIMINE TO PRECLUDE UNSEEN
SIGNAGE, FENCING, OR OTHER BARRIERS**

COMES NOW, Defendant Daniel Paul Gray (“Gray”), through the undersigned counsel, John M. Pierce, Esq., files this Motion in Limine to preclude from trial any evidence, discussion, or argument regarding signs, fencing, dispersal announcements, barricades or other barriers unless the offering party first lays a foundation that Defendant actually was in a place to witness such features.

Defendant Gray is charged with several criminal offenses which require the United States to prove that he knew he was in an unauthorized area or areas. At trial, Gray will contest these false assertions, because under Rules 401 and 403, the government must be precluded from introducing evidence, discussion, or argument of any signs, plaques, notices, “No Trespassing” markings, dispersal announcements, barriers, fences or barricades, which Gray could not have seen or heard himself at his location(s).

Dated: August 3rd, 2023

Respectfully submitted,

/s/ John Pierce

John M. Pierce
John Pierce Law Firm
21550 Oxnard Street
3rd Floor, PMB #172
Woodland Hills, CA 91367
Tel: (213) 400-0725
Email: jpierce@johnpiercelaw.com

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2023, I uploaded this document to the Court's ECF system, serving all parties of record.

/s/ John Pierce