

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

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>v.</b>	)	
	)	<b>CRIM NO. 21-CR-28</b>
<b>SANDRA PARKER,</b>	)	<b>Judge: Mehta</b>
	)	

**MOTION IN LIMINE REGARDING APPLICABILITY  
OF EVIDENCE AGAINST CODEFENDANT BENNIE PARKER  
TO DEFENDANT SANDRA PARKER**

COMES NOW defendant Sandra Parker, through counsel, and moves *in limine* for a ruling regarding evidence presented by the government as to Bennie Parker and its applicability to codefendant Sandra Parker. As reasons therefor, defendant Sandra Parker states as follows:

1. During the trial, the government may present evidence regarding codefendant Bennie Parker that neither: 1) makes any reference to Sandra Parker, 2) provides proof of Sandra Parker's involvement with the creation of the contents of the evidence, nor 3) provides proof that Sandra Parker had direct knowledge of the evidence itself or the contents therein.

2. It is defendant Sandra Parker's concern that the government may try to imply, merely because of their marital relationship, that these pieces of evidence that

involve Bennie Parker, but not Sandra Parker, should somehow be used against Sandra Parker, even though there will be no direct evidence that Sandra Parker participated in, had knowledge of, or even was aware of these pieces of evidence.

3. Defendant Sandra Parker therefore requests that the government be precluded from arguing that such evidence against Bennie Parker be applied to Sandra Parker unless there is an additional relevant evidentiary link showing Sandra Parker's knowledge, involvement, or direct connection to such evidence. The fact that evidence may apply to Bennie Parker, standing alone, is not sufficient to make that evidence apply to Sandra Parker, and therefore it is not relevant. Fed R. Evid. 401(a).

4. Sandra Parker would also request that a limiting instruction be provided to the jury that indicates that the evidence against Bennie Parker should not be considered against Sandra Parker unless the government can provide some relevant non-hearsay link to such evidence (and vice versa, to the extent applicable).

WHEREFORE, Sandra Parker requests this motion *in limine* be granted, and the government be limited in their presentation of their evidence accordingly.

Respectfully submitted,

SANDRA PARKER

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**Certificate of Service**

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 16th day of December, 2022, which will send a notification of such filing (NEF) to the following to all counsel of record.

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