

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

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**UNITED STATES OF AMERICA,**

**v.**

**FREDERICO GUILLERMO KLEIN,**

**Defendant.**

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**Criminal No. 1:21-cr-00040-TNM**

**RESPONSE TO GOVERNMENT’S MOTIONS IN LIMINE**

The government’s Motions *in Limine* seek the exclusion of irrelevant evidence, to which Defendant Federico (a/k/a “Freddie”) Klein does not object. Specifically, Mr. Klein does not object to the government’s request to limit cross examination of any potential secret service witnesses. *See* Mot. *In Limine* (June 3, 2022) (ECF No. 313). Nor does he object to the government’s request to limit evidence concerning the specific locations of U.S. Capitol Police surveillance cameras where the same is not relevant to Mr. Klein’s defense. *See* Mot. *In Limine* (June 3, 2022) (ECF No. 314). Mr. Klein does, however, reserve the right to introduce any such evidence to the extent the same is made relevant by the government’s case-in-chief. Should Mr. Klein desire to do so, he does not object to the Court’s *in camera* consideration of the same.

With respect to the government’s Motion *in Limine* to preclude any claim of self-defense by Mr. Klein (June 3, 2022) (ECF No. 327), the Court should deny the same given that it is premature for Mr. Klein to advise the government whether evidence sufficient to warrant an instruction of self-defense will have been presented at trial. Mr. Klein is not set to begin his trial for nearly three (3) months and his investigation of the facts and circumstances giving rise to the government’s charges is ongoing. While the government’s characterization of the evidence it purports to have as against Mr. Klein is salacious, even if true, it does not preclude Mr. Klein

from asserting that he acted in self-defense. Only after the evidence in Mr. Klein's case has been presented to the jury can the Court determine whether a self-defense instruction is warranted. To that end, Mr. Klein has no objection to refraining from making any such argument absent advanced approval of the Court.

### CONCLUSION

For the foregoing reasons, Mr. Klein does not now oppose the government's June 3, 2022, Motions *in Limine* to exclude irrelevant evidence (ECF Nos. 313 and 314) and further opposes the government's June 3, 2022, Motion *in Limine* to preclude any claim of self defense while reserving the right to revisit the issue should evidence of the same warrant a self-defense instruction.

[SIGNATURE ON NEXT PAGE]

Dated: July 15, 2022

Respectfully submitted,

/s/ Stanley E. Woodward, Jr.

Stanley E. Woodward, Jr. (D.C. Bar No. 997320)

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**CERTIFICATE OF SERVICE**

On July 15, 2022, the undersigned hereby certifies that a true and correct copy of the foregoing was electronically filed and served via the CM/ECF system, which will automatically send electronic notification of such filing to all registered parties.

/s/ Stanley E. Woodward, Jr.

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