

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

UNITED STATES)	
V.)	Case No. 1:21-cr-00191-JEB-1
RYAN ZINK,)	
Defendant.)	

**DEFENDANT ZINK’S MOTION IN LIMINE TO PRECLUDE UNSEEN
SIGNAGE, FENCING, OR OTHER BARRIERS AND TO PRECLUDE
ARGUMENTS THAT ZINK IS GUILTY BASED ON THE ACTIONS OF
OTHERS.**

Comes Now Defendant Ryan Zink, by and through his counsel of record, with 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 Zink actually was in a place to witness such features.

Zink is charged with several criminal offenses which require the United States to prove that Zink knew he was in an unauthorized area or areas. At trial, Zink will contest these assertions.

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 Zink could not have seen or heard himself at his location(s).

Additionally, Zink seeks an order precluding prosecutors or prosecution witnesses from arguing or suggesting Zink is guilty of any crime(s) due to the criminal conduct of others. Such evidence or argument is irrelevant, confusing, and misleading.

Date: June 12, 2023

Respectfully Submitted,

/s/ John M. Pierce

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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on June 12, 2023, this motion was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ John M. Pierce

John M. Pierce