

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA  
Filed Electronically

CRIMINAL ACTION NO. 21-CR-589 (TFH)  
UNITED STATES OF AMERICA,

PLAINTIFF,

vs.

JOSEPH IRWIN,

DEFENDANT.

**DEFENDANT'S RESPONSE TO UNITED STATES' MOTION *IN LIMINE***  
**REGARDING EVIDENCE ABOUT THE SPECIFIC LOCATIONS OF U.S. CAPITOL**  
**POLICE SURVEILLANCE CAMERAS**

Comes the defendant, Joseph Irwin ("Defendant," or, in the alternative, "Mr. Irwin"), by counsel, and in response to the United States' Motion *in Limine* regarding evidence of the specific locations of U.S. Capitol Police surveillance cameras, provides as follows:

Mr. Irwin does not oppose the Government's motion. The Defendant does not intend to use or present the camera map at trial, nor will counsel question witnesses about the exact location of the surveillance cameras. Mr. Irwin does, however, plan to question witnesses about the contents of any video footage depicting him or the lack of same in certain areas. Such questioning would not divulge the location of the cameras. Mr. Irwin should, therefore, be permitted to establish these facts at trial through cross-examination of appropriate law enforcement witnesses.

/s/ Chastity R. Beyl  
Federal Defender  
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629 Fourth Avenue  
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(502) 584-0525

Counsel for Defendant.

**CERTIFICATE**

I hereby certify that on November 23, 2022, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to the attorneys of record.

/s/ Chastity R. Beyl