

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : CASE NO. 22-CR-66 (CJN)
 :
 :
 MATTHEW JASON BEDDINGFIELD, :
 :
 Defendant. :

GOVERNMENT RESPONSE TO DEFENDANT'S MOTION *IN LIMINE*

The government does not intend to file the victim impact statement referred to by the defense in its motion *in limine*. Moreover, former U.S. Capitol Police Sergeant Aquilino Gonell is not seeking the opportunity to give an oral victim impact statement at sentencing. As the defense has pointed out, the primary victim of the charged offense in this case is USCP Officer N. C. and the government expects to focus its presentation at sentencing on that conduct. The government stands by the quotation from former Sergeant Gonell in its Sentencing Memorandum, ECF No. 48 at 18, and notes that the Court may appropriately consider any evidence that weighs on the 18 U.S.C. § 3553(a) factors but does not intend but does not intend to further invoke Beddingfield's conduct against former Sgt. Gonell. Because of this, the government asks this Court to deny defendant's motion *in limine* as moot.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
DC Bar No. 481052

By:



SEAN P. MURPHY
Assistant U.S. Attorney
DC Bar No. 1187821
Torre Chardon, Ste 1202
350 Carlos Chardon Ave
San Juan, PR 00918
sean.murphy@usdoj.gov
787-766-5656