

United States District Court  
District of Columbia

United States of America	)	
	)	
vs.	)	Case No. 1:22-CR-00038-BAH
	)	
Jolene Eicher	)	

Response to Government Motion *in Limine* Regarding Evidence about the specific  
Locations of U.S. Capitol Police Surveillance Cameras

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The Government moves the Court to rule *in limine* to restrict the presentation of evidence regarding the specific position of U.S. Capitol Police surveillance cameras. This motion specifically references “Exhibit 1” which purports to be a “Declaration of Thomas A. DiBiase”. This exhibit is not attached to the motion. Such an exhibit further does not appear to be filed under seal or otherwise in this case. The Defendant, therefore, prays the Court deny this motion other than as conceded below.

The Government has provided the Defendant with maps of the capitol which may contain information regarding the approximate location of cameras within the Capitol building. The Defendant concedes that presentation of the maps as exhibits within the trial of this matter or the exact location of such cameras is unlikely to be pertinent to presentation of the Defendant’s case. Should trial circumstances arise such that counsel believes this should be reconsidered counsel for Ms. Eicher will bring this to the Court’s attention before any such inquiry.

Respectfully Submitted,

**Jolene Eicher**  
By Counsel

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/s/ Matthew Hill