

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 Cross-Examination of U.S.
Secret Service Witnesses

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The Government moves the Court to rule *in limine* that the Defendant be limited in cross-examination of Secret Service witnesses. Specifically they seek a prohibition from inquiry regarding:

1. Secret Service protocols related to the locations where protectees or their motorcades are taken at the Capitol or other government buildings when emergencies occur;
2. Details about the nature of Secret Service protective details, such as the number and type of agents the Secret Service assigns to protectees.

The Defendant concedes that these two areas of inquiry should, preliminarily, be excluded from cross-examination by the Defendant. 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