

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 22-cr-38 (BAH)
	:	
JOLENE EICHER,	:	
	:	
Defendant.	:	

**UNITED STATES' REPLY IN SUPPORT OF ITS MOTIONS IN LIMINE REGARDING  
EVIDENCE ABOUT THE SPECIFIC LOCATIONS OF U.S. CAPITOL POLICE  
SURVEILLANCE CAMERAS AND U.S. SECRET SERVICE WITNESS**

The United States of America moved *in limine* to restrict the presentation of evidence regarding the specific position of U.S. Capitol Police surveillance cameras and the cross-examination of a United States Secret Service Witness. ECF Nos. 49 and 50. Defendant has responded that the evidence is unlikely to be pertinent and the areas should be precluded. ECF

Nos. 55 and 56. The United States submits the Declaration of Thomas A. DiBiase in support of its Motion in Limine regarding the specific position of U.S. Capitol Police surveillance cameras.

Dated: May 8, 2023

Respectfully submitted,

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United States Attorney

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