

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

UNITED STATES OF AMERICA)	
)	
)	
v.)	
)	Criminal No. 1: 22-cr-00354-RCL-1 and 2
RICHARD SLAUGHTER, and)	
CADEN GOTTFRIED)	
)	
Defendants)	
)	

**DEFENDANTS’ REPLY TO GOVERNMENT’S OPPOSITION (ECF #58) TO
DEFENDANTS’ MOTION TO DISMISS Count 1 (ECF #52)**

COMES NOW, the Defendants Slaughter and Gottfried, by and through undersigned counsel, with this Reply to the Government’s recent opposition (#58) to Defendants’ Motion to Dismiss Count 1(#52).

The United States’ Opposition cites no case law with the exception of “Statement[s] of Facts for Stipulated Trial[s]” in other January 6 cases.

Never in the history of federal courts has the District of Columbia—created by the Constitution—been considered “the special maritime or territorial jurisdiction of the United States.” D.C. is not a U.S. territory.

There are, of course, courts where robberies, murders, rapes, etc. alleged at the Capitol or elsewhere in D.C. can be prosecuted and tried. Those are the District of Columbia *Superior Courts*. But the U.S. District Court is without jurisdiction to preside over or try such cases.

ACCORDINGLY, Count 1 must be dismissed as it alleges an offense outside the jurisdiction of this Court.

Dated: September 29, 2023

Respectfully Submitted,

/s/ John M. Pierce

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CERTIFICATE OF SERVICE

I, John M. Pierce, hereby certify that on this day, September 29, 2023, I caused a copy of the foregoing document to be served on all counsel through the Court's CM/ECF case filing system.

/s/ John M. Pierce

John M. Pierce