

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

-v-

RICHARD SLAUGHTER, and
CADEN GOTTFRIED,
Defendants.

Criminal No.: 1: 22-cr-00354-RCL-
1 and 2

**DEFENDANTS REPLY TO
UNITED STATES 'RESPONSE
IN OPPOSITION TO
DEFENDANT'S MOTION IN
LIMINE TO PRECLUDE ALL
DISCUSSIONS OF SIGNS,
BARRICADES,
ANNOUNCEMENTS, AND BAD
ACTS NOT SEEN OR
COMMITTED BY
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DEFENDANTS.**

COMES NOW, the Defendants Slaughter and Gottfried, by and through his counsel of record John Pierce, with this reply to “United States Response in opposition to Defendants’ Motion in Limine to Preclude All Discussion of Signs, Barricades or Announcements Not Seen by Defendants as well as All Discussion of Bad Acts, Crimes, or Guilt by People Other than Defendants” (“the response,” Doc. 74.). Slaughter and Gottfried (“the defendants”) request that the Court

preclude from trial “any evidence, discussion, or argument regarding signs, fencing, dispersal announcements, barricades or other barriers” unless the government makes a showing that the defendants were “in a place to clearly and obviously witness such features.” Defendant’s Motion, Dkt. 69, at 1. They also seek to preclude the government from offering evidence or testimony “that others may have committed bad acts or crimes as a way to impose guilt” on the defendants. Id at 2. Defendants’ Motion should be granted.

The government must not use guilt by association to try to convict Defendants Slaughter and Gottfried. Anything outside of direct evidence specifically to do with Slaughter or Gottfried would create a false narrative of guilt by association. This Evidence would be confusing, misleading, and time consuming.

Under Rules 401 and 403, Defendants Slaughter and Gottfried seeks an order precluding prosecutors or prosecution witnesses from arguing or suggesting Defendants Slaughter and Gottfried is guilty of any crime(s) due to the criminal conduct of others. Such evidence or argument is irrelevant, confusing, and misleading.

In the alternative, Defense requests a limiting instruction

In the alternative, Defense requests a limiting instruction to the jury instructing the jury that jurors may consider evidence of unseen signs or announcements or barriers only to show a government witness’s claims that there

were such barriers—and NOT as evidence of what defendant’s witnessed.

Dated: November 01,
2023

Respectfully Submitted,

/s/ John M. Pierce

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Attorney for Defendants

CERTIFICATE OF SERVICE

I, John M. Pierce, hereby certify that on this day, November 01, 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