

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

UNITED STATES’ PRETRIAL STATEMENT OF THE CASE

The United States, by and through undersigned counsel, and in compliance with this Honorable Court’s Pretrial Scheduling Order, Doc. 49, respectfully submits this Pretrial Statement of the Case, including proposed jury instructions. The government respectfully acknowledges that the Court requested a *joint* pretrial statement from the parties. Though the government sought the defendants’ position on this filing and the incorporated jury instructions, the government did not receive a response from defense counsel by the time of filing.

In addition, the government respectfully renews its opposition the defendants’ Motion to Continue, Doc. 75, and requests a status conference to be held as soon as practicable to address the trial schedule.

1. Parties and Counsel

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2. Nature of the Case

The government proposes that the following is an appropriate statement of the case:

This is a criminal case. The government has charged the defendants, Richard Slaughter and Caden Paul Gottfried with violating four separate federal criminal laws based on their presence and conduct on the grounds of the United States Capitol in Washington, D.C., on January 6, 2021.

Count One charges Defendant Slaughter with robbery.

Count Two charges Defendant Slaughter with assaulting, resisting, or impeding certain officers with a deadly or dangerous weapon or attempting to do so.

Count Three charges Defendant Slaughter with aiding and abetting assaulting, resisting, or impeding certain officers with a deadly or dangerous weapon.

Count Four charges Defendant Gottfried with assaulting, resisting, or impeding certain officers.

Count Five charges Defendant Slaughter with obstructing officers during a civil disorder.

Count Six charges Defendant Gottfried with obstructing officers during a civil disorder.

Count Seven charges Defendant Slaughter with entering or remaining within a restricted building or grounds with a deadly or dangerous weapon.

Count Eight charges Defendant Gottfried with entering or remaining within a restricted building or grounds.

Count Nine charges Defendant Slaughter with disorderly or disruptive conduct within a restricted building or grounds with a deadly or dangerous weapon.

Count Ten charges Defendant Gottfried with disorderly or disruptive conduct within a restricted building or grounds.

Count Eleven charges Defendant Slaughter with engaging in an act of physical violence within a restricted building or grounds with a deadly or dangerous weapon.

Count Twelve charges Defendant Gottfried with engaging in an act of physical violence within a restricted building or grounds.

Count Thirteen charges both defendants with engaging in an act of physical violence in the Capitol Building or on Capitol Grounds.

Mr. Slaughter and Mr. Gottfried deny each and every charge.

3. Proposed Jury Instructions

The government's proposed jury instructions are attached to this pleading as Attachment A.

4. Exhibit List

Consistent with the Court's order at the Status Conference held on October 18, the government will provide its exhibit list on November 8, 2023.

5. Witness List

The government's preliminary witness list is attached to this pleading as Attachment B.

6. Expert Witnesses

The government does not expect to call any expert witnesses. The government reserves its right to call an expert witness in rebuttal to the defendants' case, subject to the Court's ruling on the government's Motion in Limine to Exclude Expert Testimony. *See* Doc. 66.

7. Prior Convictions

The government does not intend to use any prior convictions for impeachment purposes.

8. Stipulations

The government has inquired whether defense counsel will be willing to enter into any stipulations ahead of trial. To date, defense counsel has not indicated any such willingness.

9. Request for Status Conference

The government respectfully requests a status conference to be held as soon as practicable to address the defendants' Motion to Continue, Doc. 75, which the government opposes, *see* Doc. 76.

Respectfully submitted,

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