



motion to quash those subpoenas. This Court ordered Defendant to respond to any motion to quash by April 5, 2004. As far as the Government is aware, Defendant has not filed any response to the motion to quash. Before trial, this Court should rule on that motion.

3. Ruling on Government's Notice of Intent to Introduce Other Crimes Evidence Pursuant to Drew v. United States. On April 5, 2004, the Government filed notice of its intent to introduce evidence of Defendant's disruptive behavior in a Senate office building in 1996 to show motive, intent, lack of mistake or accident, identity of the accused, and common scheme or plan in this case. Defendant has not filed a response to this notice. Before trial, this Court should rule on whether the Government may introduce evidence regarding Defendant's disorderly conduct in 1996.

4. Clarification of Ruling on Government's Motion In Limine. On February 25, 2004, this Court issued an order granting the Government's Motion in Limine to Preclude Reference to Defendant's Political Motivations, Political Beliefs, Political Causes, Etc. Specifically, the Court ordered that "there will be no reference to or evidence admitted at trial regarding Defendant's political motivations, political causes or political beliefs."

Before trial, this Court should make clear exactly what evidence is not admissible at trial, and what relief and sanctions may result if either of the parties violates the Court's order.

5. Ruling Regarding Defendant's Testimony. It is the Government's understanding that Defendant intends to proceed pro se at trial. Before trial, this Court should determine how Defendant will testify on direct examination should she choose to take the witness stand.

6. Ruling Regarding Role of Defendant's Attorney Adviser. It is the Government's understanding that Mark L. Goldstone, Esquire, will serve as Defendant's attorney adviser at trial. Before trial, this Court should determine whether and to what extent Mr. Goldstone will be permitted to address the jury, examine and cross-examine witnesses, and argue to the Court.

7. Ruling Regarding Objections at Trial. Before trial, this Court should instruct the parties regarding how to make and respond to objections at trial, including whether the parties should state the grounds of the objection in open court or at the bench, and whether the Court will give grounds for its ruling in open court or at the bench.

8. Ruling Regarding Judicial Notice of Constitution and Statutes. At trial, the Government intends to introduce an

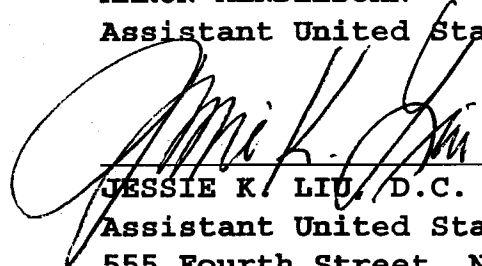
enlarged copy of D.C. Code § 10-503.16, the statute that Defendant is charged with violating, as well as enlarged copies of the United States Constitution, art. I, § 5, cl. 2, and Authority and Rules of Senate Committees, Rule XXVI, as trial exhibits. Before trial, this Court should determine whether it will take judicial notice of the Constitution and these statutes and rules, and whether it will permit the Government to introduce them as exhibits and publish them to the jury.

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