

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 25-20135-CR-RUIZ

UNITED STATES OF AMERICA,

Plaintiff,

vs.

VANGELIS RICARDO
DOS ANJOS GOMES,

Defendant.

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RICARDO DOS ANJOS GOMES'S MOTION IN LIMINE

Ricardo Gomes, through undersigned counsel, submits this Motion in Limine to preclude the Government from introducing (1) alleged statements by Mr. Gomes disclosed on October 8, 2025, and (2) narration from its witnesses of the alleged assault that was captured on CCTV footage.

On September 30, 2025, the Court held calendar call after denying Mr. Gomes's motion to continue the trial. The defense had requested to continue the trial to obtain records for Mr. Gomes's defense that may have been material to the credibility of the Government's witnesses. DE 23, 31. At calendar call, the Court heard a defense proffer as to the requested records and their relevance to Mr. Gomes's trial. The Court responded that none of the records counsel had requested would be relevant at the trial. Tr. 18:11. The Court explained that since there is CCTV of the alleged assault, the credibility of Government witnesses is not at issue. Tr. 19:18–21.

On October 8, 2025, following calendar call, the Government disclosed

statements that Mr. Gomes allegedly made to Government witnesses. Because the Court has found that Government witness credibility is not an issue at trial given the existence of CCTV footage, Mr. Gomes requests that the Court preclude the Government from introducing these statements. For the same reason, he requests that the Court preclude the Government from eliciting testimony from its witnesses narrating the alleged assault. Of course, the witnesses may identify themselves, fellow officers, or Mr. Gomes if they are able. But to allow the Government to elicit testimony of Mr. Gomes's alleged statements or narration of the video puts witness credibility or bias squarely at issue. Further, denying Mr. Gomes the opportunity to question or challenge the witnesses' credibility compromises his Sixth Amendment right to put on a defense.

The undersigned conferred with Assistant United States Attorney Melissa Shaw, who advised that the Government opposes this Motion.

Respectfully Submitted,

HECTOR A. DOPICO
FEDERAL PUBLIC DEFENDER

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CERTIFICATE OF SERVICE

I HEREBY certify that on **October 9, 2025**, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: s/ MaeAnn Dunker
MaeAnn Dunker