

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 1:19-cr-20693-UU

UNITED STATES OF AMERICA

Plaintiff,

v.

PETER SOTIS and  
EMILIE VOISSEM,

Defendants.

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**DEFENDANT PETER SOTIS' MOTION IN LIMINE**

COMES NOW, the Defendant PETER SOTIS, by and through the undersigned attorneys, and hereby submits this Motion in Limine, and in support thereof states as follows:

1. This matter is currently set for a two-week trial beginning on July 20, 2020.
2. The motion cutoff is today.
3. On May 29, 2020, the government filed its Motion in Limine (DE 35) and, as noted in the government's motion, the undersigned indicated our opposition to said motion.
4. In an abundance of caution, Defendant Sotis files the instant motion to reiterate his position and the reasons on which the objections are based.
5. The government asserts that it intends to offer evidence of threats to its witness, Sean Robotka, by Defendant Sotis.
6. The government insists that the threats it intends to offer into evidence are admissible, as they demonstrate the Defendant's "consciousness of guilt."
7. Defendant Sotis objects to the admission of any such evidence based on the fact that any possible probative value of such (uncorroborated) evidence would be outweighed by its gross prejudicial effect, should it be admitted at trial, FED. R. EVID. 403.

8. Defendant Sotis further objects to the admission of any evidence of any “admissions [supposedly made by him] to Robotka that he [Sotis] directed an employee to conceal or destroy evidence.” Here again, the value of any such uncorroborated evidence would be outweighed by its gross prejudicial effect, should it be allowed into evidence. *Id.*

9. This motion is made in good faith and not for purposes of delay.

WHEREFORE, for the reasons set forth herein, the undersigned attorney respectfully requests that this Honorable Court grant the foregoing Motion in Limine, noting Defendant Sotis’ objections contained herein.

Dated: June 26, 2020

Respectfully submitted,

**BRUCE L. UDOLF, P.A.**

*Counsel for Defendant Peter Sotis*  
600 South Andrews Avenue, Ste. 502  
Fort Lauderdale, FL 33301  
Telephone: (954) 309-0438  
Facsimile: (954) 206-5893  
[budolf@bruceudolf.com](mailto:budolf@bruceudolf.com)

By: /s/ Bruce L. Udolf  
Florida Bar No. 0899933

**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically using the Court’s CM/ECF system on this 26<sup>th</sup> day of June and was served electronically to all counsel of record.

By: Bruce Udolf