

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA (WASHINGTON, DC)

UNITED STATES OF AMERICA

V.

CAUSE NO. 1:21-cr-00599-RBW

THOMAS HARLEN SMITH

**REPLY TO GOVERNMENT’S MOTION FOR REVISED JURY INSTRUCTIONS AND  
VERDICT FORMS**

Defendant, Thomas Harlen Smith, by and through counsel, files this reply to the Government’s motion for revised jury instructions and verdict forms, and would respectfully show as follows:

Mr. Smith does not oppose the Government’s proposed definition to the term “forcibly” regarding Counts Four and Five.

Mr. Smith does not oppose the Government’s proposed changes to “assault” or to the inclusion of the definition of “injury.”

Mr. Smith does not oppose the Government’s proposed clarification of “bodily harm” in the “act of physical violence” in Count Twelve. Count Nine is specific to Mr. Smith’s co-defendant Donnie Wren only.

Mr. Smith does not oppose the Government’s Verdict Form Revision.

Respectfully Submitted,

THOMAS HARLEN SMITH

By: /s/ Gregory S. Park  
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CERTIFICATE OF SERVICE

I, Gregory S. Park, attorney for the Defendant, Thomas Harlen Smith, do hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which provided notification to all parties of record.

Dated this the 13th of April, 2023.

/s/ Gregory S. Park  
GREGORY S. PARK  
Assistant Federal Public Defender