

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-cr-454 (PLF)
v.	:	
	:	
ANTHONY PUMA,	:	
	:	
Defendant.	:	
	:	

**UNITED STATES' NOTICE OF RECENT AUTHORITY RELEVANT TO
DEFENDANT'S MOTION TO DISMISS**

The United States respectfully files this notice to alert the Court and counsel of a recent decision in this district relevant to defendant Anthony Puma's motion to dismiss (ECF No. 20). In *United States v. McHugh*, 21-cr-453 (JDB), ECF No. 51 (D.D.C. Feb. 1, 2022), Judge Bates found, in an extensive discussion, that the January 6th Certification was an "official proceeding" and that 18 U.S.C. § 1512(c)(2) is not unconstitutionally vague. Judge Bates also concluded that Vice President Pence was "temporarily visiting" the Capitol on January 6 and therefore the Capitol building and grounds qualifies as a "Restricted Building or Grounds" under 18 U.S.C. § 1752(a). The *McHugh* opinion is attached as Exhibit 1.

Respectfully submitted,

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By:

/s/Amanda Jawad
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CERTIFICATION OF SERVICE

I hereby certify that on February 16, 2022, I caused a copy of the foregoing motion to be served on counsel of record via electronic filing.

/s/Amanda Jawad
Amanda Jawad