

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 21-cr-40/TNM

PATRICK MCCAUGHEY III et al.,

Defendant.

DEFENDANT STEVENS' RESPONSE TO ECF NO. 422

The defendant, TRISTAN CHANDLER STEVENS, by and through his undersigned counsel responds to the government's proposed elements of the offenses contained in ECF No. 422:

Mr. Stevens objects to the government's definition of "deadly or dangerous weapon," ECF No. 422 at 12, and instead proposes the following definition based on Mr. Stevens' alleged use of a shield, an object that is not inherently deadly or dangerous:

An object is a deadly or dangerous weapon if (1) the object is capable of causing serious bodily injury or death, and (2) the defendant used the object in in a manner that is likely to cause serious bodily injury or death.¹

Otherwise, Mr. Stevens accepts the government's proposed elements of the offenses listed in ECF No. 422.

¹ *United States v. Arrington*, 309 F.3d 40, 45 (DC Cir. 2002).

RESPECTFULLY SUBMITTED this 23rd day of August, 2022.

/s/ Lauren Cobb

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