

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 21-cr-444-JEB

BRIAN CHRISTOPHER MOCK,

Defendant.

**DEFENDANT'S RESPONSE TO GOVERNMENT'S
PROPOSED JURY INSTRUCTIONS**

Brian Mock, by counsel, files this response to the government's proposed jury instructions.

1. Mock maintains his readings of the statutes underlying Counts One and Two as set forth in his motions to dismiss (DE 75-79.)

2. However, the defense recognizes that the Court has declined to adopt these readings. (*See* DE 82 & 83.)

3. Mock therefore, for preservation purposes only, objects to the instructions for Counts One and Two.

4. Mock otherwise joins the government's proposed instructions. Its string cite reveals that its proposals have become a matter of course in the January 6 prosecutions before various judges of this Court.

5. Finally, the defense's joining of these proposals is of course subject to what the trial evidence supports. If it turns out after all evidence is received that one or more instructions is unnecessary or inapposite, the defense reserves the right to challenge its inclusion.

Dated at Washington, D.C., this June 17th, 2023.

Respectfully submitted,

Peter R. Moyers

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