

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

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-cr-190-DLF
v.	:	
	:	
ZACHARY JORDAN ALAM,	:	
	:	
Defendant.	:	

UNITED STATES' RESPONSE TO THE COURT'S ORDER TO SHOW CAUSE

On August 3, 2023, the Court ordered the government to show cause as to why a bill of particulars or some other relief should not be ordered by briefing its theory and evidence in support of the assault charges against Defendant Zachary Alam in Counts One (18 U.S.C. § 111(a)(1)) and Two (18 U.S.C. § 111(a)(1) and § 111(b)). The Court further ordered that the government submit proposed revisions, in light of the superseding indictment, to the jury instructions and/or Joint Verdict Form. The government will be filing a motion to dismiss with regard to Count Two, and thus, further action on jury instructions or legal theories pertaining to Count Two is moot. The government has provided proposed jury instructions for Count One in Attachment A. The government requests the Court include all six verbs in § 111(a)(1) on the Verdict Form.