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Attorneys for Defendant  
YVONNE ST CYR

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	1:22-cr-00185-JDB
	)	
Plaintiff,	)	DEFENDANT'S PROPOSED
	)	JURY INSTRUCTIONS
vs.	)	
	)	
YVONNE ST CYR,	)	
	)	
Defendant.	)	
	)	
_____	)	

**DEFENSE PROPOSED JURY INSTRUCTIONS<sup>1</sup>**

Ms. St Cyr, through counsel, respectfully moves this Court to permit these jury instructions to be filed in the above case.

<sup>1</sup> The Defendant inadvertently neglected to include the definition of "Capitol Buildings" in Proposed Instruction 6. It is included in this modified submission.

## DEFENSE PROPOSED INSTRUCTION NO. 6

### **Elements of Count Six- 40 U.S.C. §5104(e)(2)(G)-Parading, Demonstrating, or Picketing in a Capitol Building**

Count Six of the Indictment charges the defendant with Parading, Demonstrating, or Picketing in a Capitol Building.

In order to find the defendant guilty of this offense, you must find that the government proved each of the following elements beyond a reasonable doubt:

1. First, that the defendant was inside the United States Capitol Building;
2. Second, that the defendant paraded, demonstrated, or picketed; and
3. Third, that the defendant acted willfully and knowingly.<sup>2</sup>

#### Definitions

The terms “parade” and “picket” have the ordinary meanings of what amounts to parading and picketing. The term “demonstrate” refers to conduct that would disrupt the orderly business of Congress by, for example, impeding or obstructing passageways, hearings, or meetings, but does not include activities such as quiet praying.<sup>3</sup>

The term “willfully” has the same meaning described in the instructions for Count One defining “willfully.”

The term “Knowingly” shall have the same meaning as that described in the instructions for Count One.

“Capitol Buildings” means the United States Capitol, the Senate and House

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<sup>2</sup> *Thompson*, ECF No. 83 at 39.

<sup>3</sup> *Id.*

Office Buildings and garages, the Capitol Power Plant, the Administrative Building of the United States Botanic Garden, the Library of Congress Buildings and Grounds, all subways and enclosed passages connecting two or more of those structures, and the real property underlying and enclosed by any of those structures.<sup>4</sup>

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<sup>4</sup> 40 U.S.C. § 5101.

Dated: March 1, 2023

Respectfully submitted,  
NICOLE OWENS  
FEDERAL PUBLIC DEFENDER  
By:

/s/ Nicole Owens  
Nicole Owens  
Federal Defender Services of Idaho  
Attorneys for Defendant  
YVONNE ST CYR

CERTIFICATE OF SERVICE

I CERTIFY that I am an employee of the Federal Defender Services of Idaho, and that a copy of the foregoing document was served on all parties named below on this 1<sup>st</sup> day of March, 2023.

Jacqueline Schesnol, Assistant United States Attorney

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Dated: March 1, 2023

/s/ Joy Fish

Joy Fish