## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

: CASE NO. 21-CR-647

v.

:

BENJAMEN SCOTT BURLEW,

:

Defendant. :

## RESPONSE TO PROPOSED VOIR DIRE AND PRELIMINARY INSTRUCTIONS

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, responds to the Court's proposed voir dire and preliminary instructions as follows:

## **VOIR DIRE**

- Paragraph 3: The government notes that Jason Crawford is no longer associated with the government.
- 2. **Paragraph** 7: The government notes that it has filed an updated witness list.

## PRELIMINARY INSTRUCTIONS

- 1. For Count Two, the fourth element should read: "the officer was assisting officers of the United States who were engaged in the performance of their official duties."
- 2. For Count Three and Count Four, the first element should include the words "restricted building or grounds."
- 3. For Page 11, the government notes that Jason Crawford is no longer associated with the government.

Respectfully submitted,

MATTHEW M. GRAVES United States Attorney D.C. Bar No. 481052

By: /s/ Anna Z. Krasinski

ANNA Z. KRASINSKI

Assistant United States Attorney New Hampshire Bar No. 276778 United States Attorney's Office

Detailed from the District of New Hampshire

Phone: (202) 809-2058

Email: anna.krasinski@usdoj.gov

Jennifer Leigh Blackwell

Jennifer Leigh Blackwell

Assistant United States Attorney

D.C. Bar No. 481097

U.S. Attorney's Office for the District of Columbia

601 D Street, N.W.

Washington, D.C. 20530

Phone: (202) 803-1590

Email:jennifer.blackwell3@usdoj.gov