

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
v.	)	No. 21-cr-509 (TSC)
ANTONY VO,	)	
	)	
Defendant	)	
_____	)	

**ANTONY VO'S PROPOSED THEORY OF THE DEFENSE**  
**INSTRUCTION**

Antony Vo, through his attorneys, submits the following Theory of the Defense instruction:

Antony Vo entered the Capitol building and crossed into what had been delineated as a “restricted perimeter” on January 6<sup>th</sup>. Still, he is not guilty of the charged offenses because he did not do so knowingly with a criminal intent. In other words, the government has not proven that Mr. Vo knew either that the Capitol grounds or the building was “restricted” nor that he knew, at the time he entered those areas, that entering those areas could constitute a crime. Moreover, Mr. Vo is not guilty because the government has not proven that he engaged in disorderly or disruptive conduct while in the Capitol building or grounds. His conduct was peaceful, not disorderly and not intended to disrupt the orderly conduct of government business or official functions. Finally, the government has not proven that Mr. Vo engaged in any conduct that could be reasonably interpreted as

parading, demonstrating, or picketing; much less that he did so willfully and knowingly.

Respectfully submitted,

A.J. KRAMER  
FEDERAL PUBLIC DEFENDER

/s/

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