

1 during the course of the trial. A copy of these proposed instructions will be delivered to the
2 Court on a 3 ½” floppy disk in the WordPerfect 9 format.

3 Depending on the evidence adduced at trial, some of the instructions included herein may
4 not be appropriate, and some additional instructions may be required. The government
5 respectfully reserve the right to request additional jury instructions or modifications of the
6 attached instructions at trial.

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8 DATED: February 18, 2009

Respectfully submitted,

9 JOSEPH P. RUSSONIELLO
10 United States Attorney

11
12 /s/
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TABLE OF JURY INSTRUCTIONS

**NINTH CIRCUIT
MODEL JURY**

<u>NO.</u>	<u>INSTRUCTIONS</u>	<u>DESCRIPTION</u>
1	1.12	OUTLINE OF TRIAL
2	2.2	BENCH CONFERENCES AND RECESSES
3	2.3	STIPULATED TESTIMONY
4	2.4	STIPULATIONS OF FACT
5	2.5	JUDICIAL NOTICE
6	2.7	TRANSCRIPT OF RECORDING IN ENGLISH
7	3.12	SEPARATE CONSIDERATION OF MULTIPLE
8		COUNTS
9	4.1	STATEMENTS BY DEFENDANT
10	4.9	TESTIMONY OF WITNESSES INVOLVING
11		SPECIAL CIRCUMSTANCES – IMMUNITY,
12		BENEFITS, ACCOMPLICE, PLEA
13	4.17	OPINION EVIDENCE, EXPERT WITNESS
14	5.6	KNOWINGLY
15	7.6	COMMUNICATION WITH COURT
16	8.112	FALSE DECLARATION BEFORE GRAND JURY
17	Special #1	OBSTRUCTION OF JUSTICE
18	Special #2	ACTIVITIES NOT CHARGED
19	Special #3	EVIDENCE OF OTHER ACTS OF DEFENDANT
20		OR ACTS AND STATEMENTS OF OTHERS