

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CR. NO. 2:10cr186-MHT
)	
v.)	
)	
ROBERT B. GEDDIE, JR.,)	
)	
Defendant.)	

**DEFENDANT GEDDIE'S REQUESTED
ADDITIONAL JURY INSTRUCTIONS**

Defendant Robert B. Geddie, Jr., requests objects the following additional jury instructions,
and in support would show:

First:

I instruct you that the conduct of Mr.
McGregor and Mr. Geddie regarding
Representative Barry Mask does not
constitute a bribe, but that evidence
may be considered by you as you
deliberate on the other charges.

Second (To be read in conjunction with the Obstruction of Justice Charge):

The government has the burden to prove that the defendant caused false documents to be produced to the grand jury and he affirmatively vouched for their accuracy.

Authority: *United States v. Moon*, 718 F.2d 12210, 1236 (2nd Cir. 1983).

In regard to the application of Rule 30(b), Fed. R. Crim. P., the Defendant would point out that the first instruction above is necessary to correct the erroneous statements made by the government during its initial closing argument in which the government argued to the jury that the Barry Mask allegations did constitute a bribe. In addition, the government still has rebuttal argument which would permit the government to fully respond to both instructions, if necessary.

Respectfully submitted,

s/ James P. Judkins
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CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

s/James P. Judkins