

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

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CR. NO. 2:10cr186-MHT
	)	
MILTON E. McGREGOR,	)	
	)	
Defendant.	)	

**PROPOSED ADDITIONAL INSTRUCTIONS,  
RESPONSIVE TO GOVERNMENT CROSS-EXAMINATION  
ON JULY 28**

Milton McGregor respectfully requests that the jury be instructed as follows, in addition to instructions previously requested.:

1. Mr. Crosby is not a “public official” as that term is used in Alabama’s ethics law.

[Authority: Ala. Code § 36-25-1(23) and –(24) (defining “public official” and “public employee”)]

2. Because Mr. Crosby is not a “public official” in that sense, neither Mr. McGregor nor any company with which he was affiliated was required by Alabama’s ethics law to disclose the payments to him on any Report of Lobbying Activities.

[Authority: The Government was attempting to show that payments to Mr. Crosby should have been disclosed on the Report on the theory that he was a “public official.” He was not.]

Respectfully submitted,

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#### CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2011, I filed the foregoing with the Clerk of the Court using the CM/ECF filing system, and that a copy of same will be served on the below listed counsel of record via such system:

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