



UNITED STATES' SUPPLEMENTAL PROPOSED JURY INSTRUCTION NO. 1

Joint Transcripts

Transcripts admitted into evidence are the parties' best efforts to accurately transcribe the corresponding portions of admitted audio recordings.

UNITED STATES' SUPPLEMENTAL PROPOSED JURY INSTRUCTION NO. 2

Preparation of Witnesses

It is perfectly proper for prosecutors and defense attorneys alike to prepare their witnesses in preparation for trial. In fact, it would be irresponsible for a party to put on a witness without first preparing the witness.

AUTHORITY

Banks v. Thaler, 583 F.3d 295, 322-23 (5<sup>th</sup> Cir. 2009); United States v. Rivera-Hernandez, 497 F.3d 71, 80 (1<sup>st</sup> Cir. 2007) (quoting United States v. Mooney, 315 F.3d 54, 60 (1<sup>st</sup> Cir. 2002); United States v. Torres, 809 F.2d 429, 434 (7<sup>th</sup> Cir. 1987).

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 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 attorneys of record.

/s/ Barak Cohen

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