

**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
)	
LARRY P. MEANS,)	
)	
Defendant.)	

LARRY P. MEANS' PROPOSED JURY INSTRUCTIONS

COMES NOW the Defendant, Larry P. Means, and submits the following proposed changes to the Court's jury instructions (Doc.#1640). Pursuant to prior directions from the Court (Transcript of Sept. 7th, sealed, pp. 19-20), Means understands that the Court does not expect this document to include every proposed jury instruction that he previously submitted, or to restate every prior objection which was made. Consequently, it is Means' understanding that the Court's decision is that all prior requests and objections are considered to be preserved. Therefore, Means submits the following:

1. Means adopts and incorporates herein each and every one of his previously proposed Jury Instructions;
2. Means adopts and incorporates herein each and every prior objection which he previously made; and,
3. Means adopts and incorporates by reference as if set forth herein the proposed changes to the Court's Jury Instructions submitted by co-counsel as they relate to the

following issues:

- a. Proposed changes of a general nature to the Court's Jury Instructions which are not related to any specific count of the Indictment;
- b. Proposed changes to the Court's Jury Instructions which relate to charges brought under 18 U.S.C. §371, and/or specifically to Count 1 of the Indictment;
- c. Proposed changes to the Court's Jury Instructions which relate to charges brought under 18 U.S.C. §666(a)(1)(B), and/or specifically to Count 6 of the Indictment.

Wherefore, Premises considered, Defendant, Larry P. Means, request that the Court charge the jury in accordance with the foregoing.

Submitted this 19th day of December, 2011.

/s/William N. Clark
William N. Clark (CLA013)
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following and **all counsel** of record electronically on this the 19th day of December, 2011.

Justin V. Shur
US Department of Justice
Public Integrity Section
1400 New York Avenue, NW
Washington, DC 20005

/s/William N. Clark

OF COUNSEL