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10 Attorneys for Plaintiff
 11 United States of America

12 UNITED STATES DISTRICT COURT
 13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

| | | |
|------------------------------|---|------------------------------|
| 14 UNITED STATES OF AMERICA, |) | CR No. 08-59(B) -GW |
| |) | |
| 15 |) | |
| 16 Plaintiff, |) | |
| |) | GOVERNMENT'S SUPPLEMENTAL |
| 17 v. |) | PROPOSED JURY INSTRUCTION ON |
| |) | 18 U.S.C. § 2(b), CAUSING AN |
| 18 |) | ACT TO BE DONE |
| 19 GERALD GREEN and |) | |
| PATRICIA GREEN, |) | |
| |) | |
| 20 Defendants. |) | |
| |) | |
| 21 |) | |
| 22 |) | |

23 Plaintiff United States of America, by and through its
 24 attorneys of record, the United States Attorney's Office for the
 25 Central District of California, and the Fraud Section, United
 26 States Department of Justice, Criminal Division, the attached
 27 supplemental proposed jury instruction on 18 U.S.C. § 2(b),
 28 Causing An Act To Be Done.

1 The government respectfully requests leave to submit
2 alternative or additional instructions or to delete instructions
3 as may become appropriate during the course of trial.

4 DATED: September 9, 2009

GEORGE S. CARDONA
Acting United States Attorney

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6 CHRISTINE C. EWELL
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8 _____
/s/

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10 JONATHAN E. LOPEZ
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11 United States Department
of Justice, Fraud Section

12 Attorneys for Plaintiff
13 UNITED STATES OF AMERICA
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1 COURT'S INSTRUCTION NO. _____

2 GOVERNMENT'S PROPOSED INSTRUCTION NO. 54

3 You may find defendants GERALD GREEN and PATRICIA GREEN
4 guilty of the offenses charged in Counts Two Through Seventeen,
5 and defendant GERALD GREEN guilty of Count Nineteen, if the
6 defendant willfully caused an act to be done which if directly
7 performed by the defendant or another would be an offense
8 against the United States.

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28 [18 U.S.C. § 2(b), Causing An Act To Be Done]