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7 Counsel for Defendant James Parker

8 **IN THE UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF ARIZONA**

10 **UNITED STATES OF AMERICA,**  
11 Plaintiff,

12 v.

13 **JAMES PARKER,**  
14 Defendants.

**No. 10-CR-757-PHX-ROS**

**DEFENDANT’S MOTION FOR  
IMMUNITY**

15  
16 NOW COMES the Defendant, James Parker, by and through his counsel of record, to  
17 Move this Court to grant immunity to a necessary defense witness and in support of the  
18 Defendant submits the following.

19 **I.**

20 The Defendant’s Constitutional Right to present testimony of a crucial witness mandates  
21 granting the witness use immunity so that her testimony can be taken.

22 **II.**

23 The Defendant is charged with four counts of Tax Evasion and four counts of making  
24 false statements to the Internal Revenue Service. His wife, Jacqueline Parker, was charged with  
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1 two counts of making false statements to the Internal Revenue Service. This Court has severed  
2 Jacqueline Parker from her husband, James Parker.

3 Jacqueline Parker's testimony is crucial in the defense of James Parker. Jacqueline  
4 Parker's attorney has informed the undersigned that she will not allow Jacqueline to take the  
5 stand and will plead 5<sup>th</sup> Amendment.

6 James Parker is asking for use immunity for Jacqueline Parker so that she is able to help  
7 in her husband's defense, without personal risk.

8 **III.**

9 **CONCLUSION**

10 For the foregoing reasons, the Defendant respectfully asks this Court to grant Jacqueline  
11 Parker immunity.

12 Respectfully submitted on April 20, 2012.

13  
14 /s/ Ashley Blair Arnett  
15 Michael Minns (pro hac vice)  
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17 Ashley Blair Arnett (pro hac vice)  
18 State Bar No. 24064833 (Texas)  
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26 - AND -

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*/s/ John McBee*  
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**CERTIFICATE OF SERVICE**

On April 20, 2012 I, Ashley Blair Arnett, attorney for the Defendant, James Parker, filed the Defendant’s Motions for Immunity *via* ECF. Based on my training and experience with electronic filing in the federal courts, it is my understanding that a copy of this request will be electronically served upon opposing counsel, Peter Sexton and Walter Perkel, upon its submission to the Court.

Respectfully submitted this 20th day of April, 2012.

s/Ashley Blair Arnett  
Ashley Blair Arnett  
Attorney for Defendant