

1 Michael Louis Minns (pro hac vice)
Texas State Bar No. 14184300
2 Ashley Blair Arnett (pro hac vice)
Texas State Bar No. 24064833
3 MICHAEL LOUIS MINNS, P.L.C.
9119 S. Gessner, Suite One
4 Houston, Texas 77074
Tel.: (713) 777-0772
5 Fax: (713) 777-0453
Email: mike@minnslaw.com

6
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 SUPPLEMENTAL
PROPOSED ADDITIONAL JURY
INSTRUCTION**

15
16 The Defendant, through undersigned counsel, respectfully submits the following jury
17 instruction to be included in the Joint Proposed Jury Instructions.

18 The Government objects to the inclusion of this proposed jury instruction. The
19 Government’s view is that the term “nominee” is not appropriate to define in a jury instruction as
20 the term “nominee” has different meanings depending on the context, and that is why the
21 interpretation is best left to arguments of counsel.

JURY INSTRUCTION NO. ____

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

The definition of a nominee is one designated to act for another as a representative in a limited sense.

West's Legal Thesaurus/Dictionary Special Deluxe Edition by: William Statsky

1 Respectfully submitted on April 20, 2012.

2 /s/ Ashley Blair Arnett
3 Michael Minns (pro hac vice)
4 State Bar No. 14184300
5 Ashley Blair Arnett (pro hac vice)
6 State Bar No. 24064833 (Texas)
7 MICHAEL LOUIS MINNS, P.L.C.
8 Counsel for Defendant James Parker
9 9119 S. Gessner Suite One
10 Houston, TX 77074
11 Tel.: (713) 777-0772
12 Fax: (713) 777-0453
13 Email: ashley@minnslaw.com

14 - AND -

15 /s/ Michael D. Kimerer
16 Michael D. Kimerer
17 Local counsel for Defendant James Parker
18 Kimerer & Derrick, P.C.
19 221 East Indianola Avenue
20 Phoenix, AZ 85012
21 Tel.: 602-229-5900
22 Fax: 602-264-5566
23 Email: MDK@kimerer.com

24 - AND -

25 /s/ John McBee
26 John McBee
Arizona State Bar No. 018497
Local counsel for Defendant James Parker
3104 E. Camelback Rd. RD PMB 851
Phoenix, AZ 85016-0001
Tel.: 602-903-7710
Fax: 602-532-7077
Email: mcbec@cox.net

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

On April 20, 2012 I, Ashley Blair Arnett, attorney for the Defendant, James Parker, filed the Defendant’s Supplemental Proposed Jury Instructions *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