

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
AT PADUCAH**

**UNITED STATES OF AMERICA**

**PLAINTIFF**

**v.**

**CRIMINAL ACTION NO. 5:06 CR-00019-R**

**STEVEN D. GREEN**

**DEFENDANT**

**UNITED STATES' PROPOSED JURY INSTRUCTIONS**

Comes the United States of America, by counsel, and submits the attached proposed jury instructions for the guilt phase as well as proposed jury instructions and a Special Verdict Form for sentencing.

The proposed jury instructions for the guilt phase are based on the Sixth Circuit Criminal Pattern Jury Instructions, with additions from the U.S. Code and the pattern criminal jury instructions from the Eighth, Ninth, and Eleventh Circuits. The sentencing instructions and Special Verdict Form are based on the Eighth Circuit's Model Death Penalty Jury Instructions. These are currently the only set of sentencing phase instructions to be approved by a federal circuit court.

Respectfully submitted,

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Acting United States Attorney

By: /s/ Marisa J. Ford

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Certificate of Service

I hereby certify that on February 17, 2009, I filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send notice of electronic filing to Scott T. Wendelsdorf, Federal Defender; Patrick J. Bouldin, Assistant Federal Defender; and Darren C. Wolff, counsel for defendant, Steven D. Green.

/s/ Marisa J. Ford

Marisa J. Ford  
Assistant U. S. Attorney