UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA	)	
	)	**Case No.: 8:21-CR-348-T-SCB-SPF**
v.	)	
	)	
JEREMY BROWN	)	

JOINT PROPOSED JURY INSTRUCTIONS

The United States of America, by and through the undersigned Assistant United States Attorney, hereby files the Parties' Joint Proposed Jury Instructions.

The proposed jury instructions are agreed to by the parties', with the following exceptions: The Defendant objects to the proposed instruction at page 9, entitled "Witnesses." The United States objects to the proposed instruction at page 24, Instruction S9, entitled "Good-Faith Defense to Willfulness (as under the Internal Revenue Code – modified for 18 USC § 793(e))."

The parties' respectfully reserve the right to propose additional instructions or to request that the proposed instructions be modified, as required based on developments at trial.

Respectfully submitted,

By: s/ Daniel J. Marcet
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U.S. v. Jeremy Brown **Case No. 8:21-CR-348-T-SCB-SPF**

CERTIFICATE OF SERVICE

I hereby certify that on October 3, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

Roger Futerman, Esq.

By: s/ Daniel J. Marcet

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