

UNITED STATES DISTRICT COURT

DISTRICT OF COLUMBIA

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 UNITED STATES OF AMERICA, : Criminal No. 1:21-CR-40  
 (TNM) :  
 :  
 v. :  
 :  
 PATRICK MCCAUGHEY III, :  
 :  
 Defendant. : August 31, 2022  
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**DEFENDANT MCCAUGHEY’S REQUEST TO CHARGE RE: "CORRUPTLY"**

In accordance with the Court's request at the end of evidence today, the defendant Patrick McCaughey III submits the following proposed definition of the term "corruptly" contained in 18 U.S.C. 1512(c)(2):

***“With an improper purpose and to engage in conduct knowingly and dishonestly with the specific intent to subvert, impede or obstruct the official proceeding.”***


This language is taken from *U.S. v. Friske*, 640 F.3d 1288, 1291 (11th Cir. 2011). The 10th Circuit has likewise adopted this definition from the 11th Circuit. *U.S. v. Gordon*, 710 F.3d 1124, 1151 (10th Cir. 2013).

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed and served electronically on all parties of record, on this 1st day of September in the year of our Lord 2022.

  
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Lindy R. Urso