

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 21-cr-28 (APM)
	:	
v.	:	
	:	
SANDRA PARKER,	:	
BENNIE PARKER,	:	
LAURA STEELE,	:	
CONNIE MEGGS,	:	
WILLIAM ISAACS, and	:	
MICHAEL GREENE,	:	
	:	
Defendants.	:	
	:	

GOVERNMENT’S SECOND SUPPLEMENTAL PROPOSED JURY INSTRUCTIONS

In light of testimony and evidence presented by Defendant William Issacs regarding his autism spectrum disorder diagnosis, the government hereby proposes the following additional instruction, to supplement its prior proposed jury instructions, at ECF Nos. 823 and 871. The following instruction is modified from Instruction 9.401 of the Redbook Criminal Jury Instructions for the District of Columbia, which instructs as to how the jury should evaluate evidence presented in support of an insanity defense. The government would propose the jury be instructed as follows:

Let me now instruct you as to how you should consider certain evidence presented by Defendant William Isaacs regarding his autism spectrum disorder (“ASD”) diagnosis. This evidence was admitted solely for the purpose of its impact on whether the government has proven the required mental state for each offense charged against Defendant Isaacs, as I just laid out in defining the elements of each offense. You alone decide what weight, if any, to give Defendant Isaacs’ ASD diagnosis and the testimony of Dr. Sperry and Dr. Askenazi on the question of whether the government has proven that Defendant Isaacs possessed the required mental state for each offense. The fact that Defendant Isaacs has been diagnosed with ASD does not, on its own, negate his criminal responsibility.

WHEREFORE, the United States respectfully request the Court include this supplemental instruction with its final jury instructions.

