

"Government's Proposed Final Jury Instruction"

JURY INSTRUCTION NO. 8

8. EVIDENCE OF ACTS NOT CHARGED IN INFORMATION

You have heard testimony of criminal acts purportedly committed by the defendant with which she is not formally charged in the information. That evidence was admitted for various collateral purposes, such as to show motive, opportunity, intent, preparation, planning, knowledge, identity or absence of mistake or accident with respect to the crime with which the defendant is actually charged here.

You are instructed that if you find that the defendant did engage in criminal activity not charged to her here, you are not to draw an inference from such a finding that the defendant is a person of bad character and that she must therefore be guilty of the crime with which she is charged.

In other words, the fact that the defendant broke the law on other occasions not charged in the information is not by itself evidence that she committed any offense for which she is now on trial.