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 United States of America  
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12 UNITED STATES DISTRICT COURT  
 13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,	)	CR No. 08-59(B)-GW
	)	
15 Plaintiff,	)	GOVERNMENT'S AND DEFENDANTS'
	)	DRAFT JOINT STATEMENT OF THE CASE
16 v.	)	TO THE JURY
	)	
17	)	Trial Date: 8/18/09 (tentative)
	)	Trial Time: 9:00 a.m. (tentative)
18 GERALD GREEN and	)	
19 PATRICIA GREEN,	)	
	)	
20 Defendants.	)	
	)	
21	)	

22 The United States, by and through its counsel of record,  
 23 the United States Attorney for the Central District of  
 24 California, and the Fraud Section, United States Department of  
 25 Justice, Criminal Division, and defendant GERALD GREEN, by and  
 26 through his attorney of record, Jerome Mooney, Esq.,  
 27 defendant PATRICIA GREEN, through her attorney of record,  
 28 Marilyn Bednarski, Esq., hereby submit the attached draft of a

1 proposed Joint Statement of the Case to the Jury, as to which  
2 the parties have substantially agreed but a few disputes remain  
3 for this Court to resolve. Accordingly, the disputed language  
4 is in brackets identified with the government or with the  
5 defense by different fonts.

6 DATED: August 5, 2009

Respectfully submitted,

7 THOMAS P. O'BRIEN  
8 United States Attorney

9 CHRISTINE C. EWELL  
10 Assistant United States Attorney  
Chief, Criminal Division

11 \_\_\_\_\_/s/  
12 BRUCE H. SEARBY  
Assistant United States Attorney

13 Attorneys for Plaintiff  
14 United States of America

15 DATED: August 5, 2009

\_\_\_\_\_/s/  
16 JEROME MOONEY, ESQ.

17 Attorney for Defendant  
18 GERALD GREEN

19 DATED: August 5, 2009

\_\_\_\_\_/s/  
20 MARILYN BEDNARSKI, ESQ.

21 Attorney for Defendant  
22 PATRICIA GREEN  
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1 [DRAFT] PROPOSED JOINT STATEMENT OF THE CASE

2 The defendants in this case, GERALD GREEN and PATRICIA  
3 GREEN, operated entertainment and public-relations businesses in  
4 Beverly Hills, California. The indictment charges them with  
5 committing several federal crimes between 2002 and 2007.

6 The indictment alleges that the Greens made payments of  
7 approximately \$1.8 million **[Govt version: in bribes][defense version:**  
8 **no addition here]** for an official of the government of Thailand to  
9 secure a series of Thai government contracts, in violation of  
10 conspiracy, anti-bribery, and money laundering laws of the  
11 United States. The Thai official's daughter and a friend opened  
12 foreign bank accounts to which the Greens caused money to be  
13 sent. The indictment alleges these monies were for the benefit  
14 of the Thai official. The Greens deny these charges,  
15 maintaining that they entered into consulting agreements with  
16 the Thai official's daughter and the friend with the desire to  
17 expand their business opportunities in Thailand and that no  
18 payments made were for the benefit of the Thai official or with  
19 a corrupt purpose.

20 The indictment alleges that PATRICIA GREEN signed and filed  
21 United States Income Tax Returns knowing that the returns  
22 falsely claimed deductions **[government version: for bribes]**  
23 **[defense version: for these disputed payments]** to the Thai official foreign  
24 official, in violation of a criminal tax law. The indictment  
25 alleges that PATRICIA GREEN misrepresented the payments on the  
26 returns as "commissions." PATRICIA GREEN denies that the  
27 payments were improperly deducted or mis-characterized.

1 The indictment alleges that GERALD GREEN altered and  
2 falsified documents after learning of the federal investigation  
3 in this case, in an effort to obstruct justice. The indictment  
4 alleges that GERALD GREEN allegedly falsified documents in  
5 attempting to give an innocent explanation for the **[government**  
6 **version: bribes][defense version: disputed payments]**. GERALD GREEN denies  
7 this charge.

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