

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,	:	
	:	
v.	:	
	:	Case No. 2:13-cr-106
EDIN SAKOČ,	:	
	:	
Defendant.	:	

JURY CHARGE

Members of the Jury:

Now that you have heard the evidence and the arguments, it is my duty to instruct you on the law. It is your duty to accept these instructions of law and apply them to the facts as you determine them.

On these legal matters, you must take the law as I give it to you. If any attorney has stated a legal principle different from any that I state to you in my instructions, it is my instructions that you must follow.

You should not single out any instruction as alone stating the law, but you should consider my instructions as a whole when you retire to deliberate in the jury room.

You should not be concerned about the wisdom of any rule that I state. Regardless of any opinion that you may have as to what the law may be – or ought to be – it would violate your

sworn duty to base a verdict upon any other view of the law than that which I give you.

This case is a criminal prosecution brought by the United States against the Defendant, Edin Sakoč. The Indictment charges Edin Sakoč with knowingly procuring his own naturalization contrary to law. Mr. Sakoč has entered a plea of not guilty.

ROLE OF THE INDICTMENT

At this time, I would like to remind you of the function of a grand jury indictment. An indictment is merely a formal way to accuse a defendant of a crime prior to trial. An indictment is not evidence. The indictment does not create any presumption of guilt or permit an inference of guilt. It should not influence your verdict in any way. It simply describes the charges against Edin Sakoč. Edin Sakoč is not on trial for any act or any conduct not specifically charged in the indictment.

You have been chosen and sworn as jurors in this case to determine the issues of fact that have been raised by the allegations of the Indictment and the denial made by Edin Sakoč's not guilty plea. You are to perform this duty without bias or prejudice against the Defendant or the prosecution.

PRESUMPTION OF INNOCENCE, REASONABLE DOUBT, AND BURDEN OF PROOF

The law presumes that the Defendant, Edin Sakoč, is innocent of the charges against him. The presumption of

innocence lasts throughout the trial and during your deliberations. The presumption of innocence ends only if you, the jury, find beyond a reasonable doubt that Edin Sakoč is guilty. Should the government fail to prove the guilt of Edin Sakoč beyond a reasonable doubt, you must find him not guilty.

The question naturally is what is a reasonable doubt? The words almost define themselves. It is a doubt based upon reason and common sense. It is a doubt that a reasonable person has after carefully weighing all of the evidence. It is a doubt that would cause a reasonable person to hesitate to act in a matter of importance in his or her personal life. Proof beyond a reasonable doubt must, therefore, be proof of such a convincing character that a reasonable person would not hesitate to rely and act upon it in the most important of his or her own affairs. A reasonable doubt is not a caprice or whim; it is not a speculation or suspicion. It is not an excuse to avoid the performance of an unpleasant duty. And it is not sympathy. However, reasonable doubt may arise from a lack of evidence.

In a criminal case, the burden is upon the government to prove guilt beyond a reasonable doubt. The law does not require that the government prove guilt beyond all possible doubt; proof beyond a reasonable doubt is sufficient to convict. This burden never shifts to the defendant, which means that it is always the government's burden to prove each of the elements of the crime

charged beyond a reasonable doubt. The law never imposes upon a defendant in a criminal case the burden or duty of calling any witnesses or producing any evidence. A defendant is not even obligated to produce any evidence by cross-examining the witnesses for the government. For the offense charged in the Indictment, if after fair and impartial consideration of all the evidence you have a reasonable doubt, you must find Edin Sakoč not guilty of the offense. If you view the evidence in the case as reasonably permitting either of two conclusions - one of innocence, the other of guilt - you must find Edin Sakoč not guilty. If, however, after fair and impartial consideration of all the evidence you are satisfied of Edin Sakoč's guilt of the offense beyond a reasonable doubt, you should vote to convict.

EVIDENCE

You have seen and heard the evidence produced in this trial and it is the sole responsibility of the jury to determine the facts of this case. The evidence consists of the sworn testimony of the witnesses, any exhibits that have been received in evidence, and all the facts which may have been admitted or stipulated. I would now like to call to your attention certain guidelines by which you are to evaluate the evidence. There are two types of evidence which you may properly use in reaching your verdict. One type of evidence is direct evidence. Direct evidence is when a witness testifies about something she or he

knows by virtue of her or his own senses - something she or he has seen, felt, touched, or heard. Direct evidence may also be in the form of an exhibit where the fact to be proved is its present existence or condition. Circumstantial evidence is evidence which tends to prove a disputed fact by proof of other facts. You infer on the basis of reason and experience and common sense from one established fact the existence or non-existence of some other fact. Circumstantial evidence is of no less value than direct evidence.

You should weigh all the evidence in the case. After weighing all the evidence, if you are not convinced of the guilt of Edin Sakoč beyond a reasonable doubt, you must find him not guilty.

I caution you that you should entirely disregard any testimony that has been excluded or stricken from the record. Likewise, the arguments of the attorneys and the questions asked by the attorneys are not evidence in the case. By the rulings I have made in the course of the trial, I did not intend to indicate to you any of my own views, or to influence you in any manner regarding how you should decide the case. The attorneys have a duty to object to evidence they believe is not admissible.

The evidence that you will consider in reaching your verdict consists, as I have said, only of the sworn testimony of

witnesses, the stipulations made by the parties, and all the exhibits that have been received in evidence. Anything you have seen or heard outside the courtroom is not evidence, and must be entirely disregarded. You are to consider only the evidence in the case. But in your consideration of the evidence, you do not leave behind your common sense and life experiences. In other words, you are not limited solely to what you see and hear as the witnesses testify. You are permitted to draw, from facts which you find have been proven, such reasonable inferences as you feel are justified in light of your experiences. However, if any juror has specialized knowledge, expertise, or information with regard to the facts and circumstances of this case, he or she may not rely upon it in deliberations or communicate it to other jurors.

CREDIBILITY OF WITNESSES

You, as jurors, are the sole judges of the credibility of the witnesses and the weight of their testimony. You do not have to accept all the evidence presented in this case as true or accurate. Instead, it is your job to determine the credibility or believability of each witness. You do not have to give the same weight to the testimony of each witness, because you may accept or reject the testimony of any witness, in whole or in part. In weighing the testimony of the witnesses you have heard, you should consider their interest, if any, in

the outcome of the case; their manner of testifying; their candor; their bias, if any; their resentment or anger toward the defendant, if any; the extent to which other evidence in the case supports or contradicts their testimony; and the reasonableness of their testimony. You may believe as much or as little of the testimony of each witness as you think proper.

The weight of the evidence is not determined by the number of witnesses testifying. You may find the testimony of a small number of witnesses or a single witness about a fact more credible than the different testimony of a larger number of witnesses. The fact that one party called more witnesses and introduced more evidence than the other does not mean that you should necessarily find the facts in favor of the side offering the most witnesses. Inconsistencies or discrepancies in the testimony of a witness, or between the testimony of different witnesses, may or may not cause you to discredit such testimony. Two or more persons may well hear or see things differently, or may have a different point of view regarding various occurrences.

Innocent misrecollection or failure of recollection is not an uncommon experience. It is for you to weigh the effect of any discrepancies in testimony, considering whether they pertain to matters of importance, or unimportant details, and whether a discrepancy results from innocent error or intentional

falsehood. You should attempt to resolve inconsistencies if you can, but you also are free to believe or disbelieve any part of the testimony of any witness as you see fit.

In this case you have heard testimony from a number of witnesses. I am now going to give you some guidelines for your determinations regarding the testimony of the various types of witnesses presented in this case.

STATEMENTS BY DEFENDANT

There has been evidence that Edin Sakoč made certain statements in which the government claims he admitted certain facts.

In deciding what weight to give Edin Sakoč's statements, you should first examine with great care whether each statement was made and whether, in fact, it was voluntarily and understandingly made. You should give the statements such weight as you feel they deserve in light of all the evidence.

DEFENDANT NOT TESTIFYING

You may have observed that Edin Sakoč did not testify in this case. In a criminal case a defendant has a constitutional right not to testify, and the government may not call him as a witness. Whether or not a defendant testifies is a matter of his own choosing. A defendant has no obligation to testify or to present evidence, because it is the government's burden to prove a defendant guilty beyond a reasonable doubt. A defendant

is never required to prove that he is innocent. A defendant's decision not to testify raises no presumption of guilt and does not permit you to draw any unfavorable inference. Therefore, in determining Edin Sakoč's guilt or innocence of the crime charged, you are not to consider, in any manner, the fact that he did not testify. Do not even discuss it in your deliberations.

GOVERNMENT AS A PARTY

You are to perform the duty of finding the facts without bias or prejudice toward any party. You are to perform this duty in an attitude of complete fairness and impartiality. This case is important to the government, for the enforcement of criminal laws is a matter of prime concern to the community. Equally, this case is important to Edin Sakoč, who is charged with a serious crime.

The fact that the prosecution is brought in the name of the United States of America entitles the government to no greater consideration than that accorded to any other party to a case. By the same token, it is entitled to no less consideration. All parties, whether government or individuals, stand as equals before the Court.

LAW ENFORCEMENT WITNESSES

You have heard the testimony of law enforcement officials in this case. The fact that a witness may be employed by the

federal, state, or local government as a law enforcement official does not mean that his or her testimony is necessarily deserving of more or less consideration or greater or lesser weight than that of an ordinary witness.

At the same time, it is quite legitimate for defense counsel to try to attack the credibility of a law enforcement witness on personal or professional interest in the outcome of the case. It is your decision, after reviewing all the evidence, whether to accept the testimony of the law enforcement witness and to give to that testimony whatever weight, if any, you find it deserves.

EXPERT WITNESSES

In this case, I have permitted certain witnesses to express their opinions about matters that are in issue. A witness may be permitted to testify to an opinion on those matters about which he or she has special knowledge, skill, experience or training. Such testimony is presented to you on the theory that someone who is experienced and knowledgeable in the field can assist you in understanding the evidence or in reaching an independent decision on the facts.

In weighing this opinion testimony, you may consider the witness's qualifications, his or her opinions, reasons for testifying, as well as all of the other considerations that ordinarily apply when you are deciding whether or not to believe

a witness's testimony. You may give the opinion testimony whatever weight, if any, you find it deserves in light of all the evidence in the case. You should not, however, accept opinion testimony merely because I allowed the witness to testify concerning his or her opinion. Nor should you substitute it for your own reason, judgment and common sense. The determination of the facts in this case rests solely with you.

DEPOSITION TESTIMONY

During the trial of this case, certain testimony has been presented to you by way of video deposition, consisting of sworn recorded answers to questions asked of the witness in advance of the trial by one or more of the attorneys. Such testimony is entitled to the same consideration and is to be judged as to credibility, and weighed, and otherwise considered by the jury, in the same way as if the witness had been present and had testified from the witness stand. In other words, you must evaluate that testimony in the same manner you would evaluate the testimony of any other witness.

RACE, RELIGION, NATIONAL ORIGIN, SEX, OR AGE

You may not consider your personal feelings about the race, religion, national origin, sex, or age of Edin Sakoč or of any of the witnesses in your deliberations over the verdict or in the weight given to any evidence. You may consider evidence of

ethnic tensions that may exist or have existed in Bosnia in assessing the credibility of witnesses.

PRIOR INCONSISTENT STATEMENTS OF A NON-PARTY WITNESS

You may find that a witness has made statements outside of this trial which are inconsistent with the statements that the witness gave here. You may consider the out-of-court statements not made under oath only to determine the credibility of the witness and not as evidence of any facts contained in the statements. As to out-of-court statements that were made under oath, such as statements made in prior testimony, you may consider them for all purposes, including for the truth of the facts contained therein.

INSTRUCTIONS ON THE SUBSTANTIVE LAW OF THE CASE

Having explained the general guidelines by which you will evaluate the evidence in this case, I will now instruct you with regard to the law that applies to your determinations in this case. It is your duty as jurors to follow the law as stated to you in these instructions and to apply the rules of law to the facts that you find from the evidence. You will not be faithful to your oath as jurors if you find a verdict that is contrary to the law that I give to you. However, it is the sole responsibility of the jury to determine the facts in this case. I do not, by any instructions I give to you, intend to persuade you in any way as to any question of fact.

COUNT ONE: PROCURING NATURALIZATION CONTRARY TO LAW

Indictment and Relevant Statutes

The government is proceeding on one count in the Indictment. It charges the Defendant with unlawfully procuring citizenship of the United States. The Indictment reads as follows:

From in or about February 2007 through in or about September 2007, in the District of Vermont, EDIN SAKOČ: knowingly procured his own naturalization contrary to law, that is, in violation of Title 18, United States Code, Sections 1001(a) (Making False Statements) and 1015(a) (Making False Statements Related to Naturalization or Citizenship) by knowingly providing false and fraudulent information as to material facts in his Application for Naturalization, Form N-400, and verified the same false and fraudulent information during his interview with a United States Immigration Officer. Specifically:

- a. On Form N-400 Part 100, question 15, and in his subsequent interview under oath, EDIN SAKOČ falsely stated that he had never "committed any crime" for which he had not been arrested;
- b. On Form N-400 Part 108, question 11, and in his subsequent interview under oath, EDIN SAKOČ: falsely stated that he had never "persecuted (either directly or indirectly) any person because of race, religion, national origin, membership in a particular social group or political opinion";
- c. On Form N-400 Part 100, question 23, and in his subsequent interview under oath, EDIN SAKOČ: falsely stated that he had never "given false or misleading information to any U.S. government official while applying for any immigration benefit"; and
- d. On Form N-400 Part 100, question 24, and in his subsequent interview under oath, EDIN SAKOČ: falsely stated that he had never "lied to any U.S. government official to gain entry or admission into the United States."

In violation of Title 18, United States Code, Section 1425(a).

The Indictment charges the Defendant with violating section 1425(a) of Title 18 of the United States Code. That section provides:

Whoever knowingly procures or attempts to procure, contrary to law, the naturalization of any person, or documentary or other evidence of naturalization or of citizenship [shall be guilty of a crime].

Title 18 of the United States Code, Section 1001(a) provides:

Whoever in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully . . . makes any materially false statement, fictitious, or fraudulent statement or representation or makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement [commits a crime].

Title 18 of the United States Code, Section 1015(a) provides:

Whoever knowingly makes any false statement under oath, in any case, proceeding, or matter relating to, or under, or by virtue of any law of the United States relating to naturalization, citizenship, or registry of aliens [commits a crime].

Elements of the Offense

In order to prove the Defendant guilty of unlawfully procuring citizenship of the United States, the government must prove each of the following elements beyond a reasonable doubt:

- First, that the Defendant procured, or attempted to procure, United States citizenship;

- Second, that the Defendant provided false information in a naturalization proceeding;
- Third, that the false information provided by the Defendant related to a material matter in a naturalization proceeding; and
- Fourth, that the Defendant acted knowingly.

First Element: Procuring Naturalization

The first element the government must prove beyond a reasonable doubt is that the Defendant procured or attempted to procure naturalization.

Second Element: Defendant Provided False Information

The second element the government must prove beyond a reasonable doubt is that the Defendant provided false information in a naturalization proceeding as alleged in the Indictment.

A statement is "false" if it was untrue when made.

Unanimity

The government alleges that the Defendant made material false statements in answering questions 15, 11, 23, and 24 when he completed and submitted an Application for Naturalization, Form N-400, and verified the same false information during an interview with an immigration officer.

In order to satisfy its burden with regard to the charge that the Defendant procured citizenship contrary to law, the government must prove, beyond a reasonable doubt, that the Defendant made one or more of these alleged false statements.

You must give separate consideration to each of the alleged false statements the government has identified. And, before you may find that the government has carried its burden of proof with regard to that element, you must unanimously agree that the Defendant made at least one particular material false statement. This means that it is not sufficient to agree the Defendant made some false statements but not agree as to which one. To convict the Defendant of the crime charged, you must all agree with regard to which specific false statement or statements the government has proved beyond a reasonable doubt.

Third Element: Materiality

The third element the government must prove beyond a reasonable doubt is that the false information alleged in the Indictment provided by the Defendant related to a material matter in the naturalization proceeding.

To prove this element, the government must prove that the Defendant's alleged misrepresentation or omission had a natural tendency to influence the government's decision in the naturalization proceeding such that truthful information would have disclosed facts relevant to the Defendant's qualification for citizenship.

Fourth Element: Knowledge

The fourth element that the government must prove beyond a reasonable doubt is that the Defendant acted knowingly.

To establish this element, the government must prove either that the Defendant knew that the misrepresentations alleged in the Indictment were false when the Defendant made them, or that the Defendant knew that he was not eligible for citizenship at the time the misrepresentations were made.

To act knowingly means to act intentionally and voluntarily, and not because of ignorance, mistake, accident, or carelessness.

DATE OF CRIME CHARGED

The Indictment charges that the offenses alleged were committed "in or about" specific dates. The government must prove that the offense happened on substantially similar dates, but is not required to prove that the alleged offense happened on those exact dates.

JUDICIAL NOTICE

I have taken judicial notice of foreign law that applies to this case. I hereby instruct you as a matter of law that the following were crimes in Bosnia and Herzegovina in July 1992, including in the Čapljina municipality: Homicide (Murder); Rape; Abduction (Kidnapping); Grievous Bodily Injury (Assault); Associating to Commit Criminal Acts (Conspiracy); Aiding; Assistance to Perpetrator After Commission of Criminal Offense (Accomplice After the Fact); War Crimes Against the Population

(which included killings, rape, unlawful bringing in concentration camps, and other illegal arrests and detention).

1. Homicide

Homicide was a crime in the Čapljina region and Bosnia and Herzegovina in July 1992, and continues to be a crime up through the present time. Homicide is defined as: Whoever deprives another person of his life.

2. Rape

Rape was a crime in the Čapljina region and Bosnia and Herzegovina in July 1992, and continues to be a crime up through the present time. Rape is defined as: Whoever by force or threat of immediate attack upon life or body compels to sexual intercourse a female person with whom he does not live in matrimonial union.

3. Abduction (Kidnapping)

Abduction was a crime in the Čapljina region and Bosnia and Herzegovina in July 1992, and continues to be a crime up through the present time. Abduction is defined as: Whoever commits the abduction of a person in order to force him or someone else to do something, not to do something, [or] to suffer.

4. Grievous Bodily Injury (Assault)

Grievous bodily injury was a crime in the Čapljina region and Bosnia and Herzegovina in July 1992, and continues to be a

crime up through the present time. Grievous bodily injury is defined as:

(a) Whoever inflicts grievous bodily injury on another person or gravely impairs his health, [or]

(b) Whoever inflicts bodily injury upon another person or impairs his health so gravely that the life of the injured person is endangered, or if an important part or organ of his body was destroyed or permanently weakened to a substantial degree, or if the injured person was made permanently unable to work, or if permanent and grave damage to his health or disfigurement took place.

5. Light Bodily Injury

Light bodily injury was a crime in the Čapljina region and Bosnia and Herzegovina in July 1992, and continues to be a crime up through the present time. Light bodily injury is defined as: Whoever inflicts light bodily injury upon another person.

6. Associating to Commit Criminal Acts (Conspiracy)

Associating to commit criminal acts was a crime in the Čapljina region and Bosnia and Herzegovina in July 1992, and continues to be a crime up through the present time. Associating to commit criminal acts is defined as: Whoever arranges with another person to commit a criminal act stipulated with republic or province legislation. Murder, rape, and grievous bodily injury are stipulated offenses.

7. Aiding

Aiding was a crime in the Čapljina region and Bosnia and Herzegovina in July 1992, and continues to be a crime up through the present time. Aiding is defined as:

(a) Anybody who intentionally aids another in the commission of a criminal act shall be punished as if he himself had committed it;

(b) The following, in particular, shall be considered as aiding: the giving of instructions or counseling about how to commit a criminal act, the supply of tools and resources for the crime, the removal of obstacles to the commission of a crime, as well as the promise, prior to the commission of the act, to conceal the existence of the criminal act, to hide the offender, the means to commit the crime, its traces, or goods gained through the commission of a criminal act.

8. Assistance to Perpetrator after Commission of Criminal Offense (Accomplice after the Fact)

Assistance to perpetrator after commission of a criminal offense, including aiding the perpetrator after the commission of a crime, was a crime in the Čapljina region and Bosnia and Herzegovina in July 1992, and continues to be a crime up through the present time. Assistance to perpetrator after commission of a criminal offense is defined as: Whoever hides a perpetrator of a criminal act under prosecution, or whoever helps him escape

discovery by concealing instruments, traces or in some other way.

9. Conspiracy for the purpose of the commission of a criminal act defined in federal law

Conspiracy for the purpose of the commission of a criminal act defined in federal law was a crime in the Čapljina region and Bosnia and Herzegovina in July 1992, and continues to be a crime up through the present time. Conspiracy is defined as: Whoever plots with another to commit a criminal act defined in the federal law. The offense to be considered under federal law in this case is War crime against the civilian population.

10. War Crimes Against Civilian Population

In the Čapljina region and in Bosnia and Herzegovina in July 1992, and continuing up through the present time, it was a war crime against the civilian population to commit the following acts during periods of war or armed conflict: killings, immense suffering or violation of bodily integrity or health, rape, and unlawful bringing in concentration camps and other illegal arrests and detention.

Mistake of Fact

The law in effect in Bosnia and Herzegovina in 1992 provided that a person is not criminally responsible if at the time of committing a criminal act he was not aware of some statutory element of it; or if he mistakenly believed that

circumstances existed which, if they had actually existed, would render such conduct permissible.

PROOF OF INTENT

In deciding whether an act was done knowingly or intentionally, you may consider any statements made and acts done by the Defendant, all the facts and circumstances in evidence which may aid in a determination of the Defendant's knowledge or intent and any reasonable inferences to be drawn from those facts and circumstances.

IMPERMISSIBLE TO INFER PARTICIPATION FROM ASSOCIATION OR PRESENCE

You may not infer that the Defendant was guilty of participating in criminal conduct merely from the fact that he associated with other people who were guilty of wrongdoing.

You may not infer that the Defendant was guilty of participating in criminal conduct merely from the fact that he was present at the time the crime was being committed and had knowledge that it was being committed.

LIMITING INSTRUCTION REGARDING JAIL PHONE CALLS

The government has offered evidence regarding phone calls made by the Defendant from jail. Let me remind you that the Defendant is not on trial for those phone calls, which were not alleged in the Indictment. Accordingly, you may not consider this evidence as substitute proof that the Defendant committed the crime charged. Nor may you consider this evidence as proof

that the Defendant has a criminal personality or bad character. The evidence of these phone calls was admitted for a much more limited purpose and you may only consider it for that limited purpose.

The government has offered this evidence because it believes the calls indicated the Defendant's consciousness of guilt. Even if you find that the calls indicated a consciousness of guilt you may not infer, on this basis alone, that the Defendant is guilty.

CONCLUSION

I caution you, members of the jury, that you are here to determine the guilt or innocence of Edin Sakoč before you today solely from the evidence in this case. I remind you that the mere fact that he has been indicted is not evidence against him.

It is your duty as jurors to consult with one another and to deliberate. Each of you must decide the case for yourself, but only after an impartial consideration of the evidence in the case with your other jurors. Do not hesitate to re-examine your own views and change your opinion if you think that you were wrong. Do not, however, surrender your honest convictions about the case solely because of the opinion of your other jurors, or for the mere purpose of returning a verdict.

To return a verdict, it is necessary that every juror agree to the verdict. In other words, your verdict must be unanimous.

Upon retiring to the jury room, your foreperson will preside over your deliberations and will be your spokesperson here in court. A verdict form has been prepared for your convenience. After you have reached agreement as to the count contained in the Indictment, you will have your foreperson record a verdict of guilty or not guilty. Your foreperson will then sign and date the verdict form and you will then return to the courtroom.

If, during your deliberations you should desire to communicate with the Court, please put your message or question in writing signed by the foreperson, and pass the note to the marshal who will bring it to my attention. I will then respond as promptly as possible, either in writing or by having you returned to the courtroom so that I can speak with you. I caution you, however, with regard to any message or question you might send, that you should never state or specify your numerical division at the time.

NOTES

You have been permitted to take notes during the trial for use in your deliberations. You may take these notes with you when you retire to deliberate. They may be used to assist your recollection of the evidence, but your memory, as jurors, controls. Your notes are not evidence, and should not take precedence over your independent recollections of the evidence.

The notes that you took are strictly confidential. Do not disclose your notes to anyone other than the other jurors. Your notes should remain in the jury room and will be collected at the end of the case.

A copy of this charge will go with you into the jury room for your use.

I appoint _____ as your foreperson.

Dated at Burlington, in the District of Vermont this 22nd day of January, 2015.

/s/ William K. Sessions III
William K. Sessions III
District Court Judge