

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 25-CR-00049-CJW
)	
vs.)	JURY INSTRUCTIONS
)	
DENNIS CLIFFORD BRUCE,)	
)	
Defendant.)	

Members of the Jury:

In the next few moments, I am going to give you instructions about this case and about your duties as jurors. I will also give you additional instructions later. Unless I specifically tell you otherwise, all instructions—both those I give you now and those I give you later—are equally binding on you and must be followed.

The instructions I am about to give you now are in writing and will be available to you in the jury room. In considering these instructions, attach no importance or significance whatsoever to the order in which they are given.

INSTRUCTION NO. 1

This is a criminal case the United States has brought against defendant Dennis Clifford Bruce. The charges are set forth in what is called an indictment. The indictment alleges defendant committed the offenses in the Northern District of Iowa and elsewhere: Count 1, conspiracy; Counts 2 and 3, bankruptcy concealment; Count 4, false bankruptcy declaration; Counts 5 and 6, false statement under oath; and Count 7, engaging in a monetary transaction in property derived from specified unlawful activity. You are instructed that Cedar Rapids, Iowa, and Marion, Iowa, are in the Northern District of Iowa.

The defendant has pled not guilty to each of those charges.

You are instructed that an indictment is simply an accusation. It is not evidence of anything. The defendant has pled not guilty, and he is presumed to be innocent unless and until proven guilty beyond a reasonable doubt. Thus, defendant begins the trial with a clean slate, with no evidence against him. The presumption of innocence alone is sufficient to find defendant not guilty and can be overcome only if the government proves during the trial, beyond a reasonable doubt, each element of the crimes charged.

There is no burden upon defendant to prove that he is innocent. Instead, the burden of proof remains on the government throughout the trial.

You will note the indictment alleges the offense was committed “in about” or “on or about” certain dates. The government need not prove with certainty the exact date or the exact time period of the offense. It is sufficient if the evidence establishes that the offense occurred within a reasonable time of the date or period of the time alleged in the indictment.

INSTRUCTION NO. 2

The crime of conspiracy, as charged in Count 1 of the indictment, has four elements, which are:

One, in about 2024, two or more people reached an agreement to defraud the United States Bankruptcy Court for the Northern District of Iowa by impeding, impairing, obstructing, and defeating the lawful government functions of the United States Bankruptcy Court for the Northern District of Iowa in determining assets and distributing them to creditors;

Two, the defendant voluntarily and intentionally joined in the agreement, either at the time it was first reached or at some later time while it was still in effect;

Three, at the time the defendant joined in the agreement, the defendant knew the purpose of the agreement; and

Four, while the agreement was in effect, a person or persons who had joined in the agreement knowingly did one or more acts, which are called “overt acts,” for the purpose of carrying out or carrying forward the agreement.

Please see the attached Interrogatory Form No. 1 for a listing of the overt acts identified in the indictment.

Instruction No. 3 further explains these elements.

For you to find the defendant guilty of this crime, the government must prove all these elements beyond a reasonable doubt. Otherwise, you must find the defendant not guilty of the crime charged under this count.

INSTRUCTION NO. 3

Element One -

Element One of Count 1 requires that two or more people reached an agreement to defraud the United States Bankruptcy Court for the Northern District of Iowa.

The indictment charges a conspiracy to defraud the United States Bankruptcy Court for the Northern District of Iowa. For you to find that the government has proved a conspiracy, you must unanimously find that there was an agreement to act for the purpose of defrauding the United States Bankruptcy Court for the Northern District of Iowa.

The agreement between two or more people to defraud the United States Bankruptcy Court for the Northern District of Iowa does not need to be a formal agreement or be in writing. A verbal or oral understanding can be sufficient to establish an agreement.

It does not matter whether a fraud was actually committed or whether the alleged participants in agreement actually succeeded in accomplishing their unlawful plan.

The agreement may last a long time or a short time. The members of an agreement do not all have to join it at the same time. You may find that someone joined the agreement even if you find that person did not know all the details of the agreement.

A person may be a member of the agreement even if the person does not know all the other members of the agreement or the person agreed to play only a minor part in the agreement.

Element Two -

Element Two of Count 1 requires that the defendant voluntarily and intentionally joined the agreement.

If you have determined that two or more people reached an agreement to defraud the United States Bankruptcy Court for the Northern District of Iowa, you must next decide whether the defendant voluntarily and intentionally joined that agreement, either

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INSTRUCTION NO. 3 (Cont'd)

at the time it was first formed or at some later time while it was still in effect.

In deciding in Element One whether two or more people reached an agreement to defraud the United States Bankruptcy Court for the Northern District of Iowa, you could consider the acts and statements of each person alleged to be part of the agreement. Now, in deciding in Element Two whether the defendant joined the agreement, you may consider only the acts and statements of the defendant.

A person joins an agreement to defraud the United States Bankruptcy Court for the Northern District of Iowa by voluntarily and intentionally participating in the unlawful plan with the intent to defraud the United States Bankruptcy Court for the Northern District of Iowa.

It is not necessary for you to find that the defendant knew all the details of the unlawful plan.

It is not necessary for you to find that the defendant reached an agreement with every person you determine was a participant in the agreement.

Evidence that a person was present at the scene of an event, or acted in the same way as others or associated with others, does not, alone, prove that the person joined a conspiracy. A person who has no knowledge of a conspiracy, but who happens to act in a way that advances the purpose of the conspiracy, does not thereby become a member. A person's mere knowledge of the existence of a conspiracy, or mere knowledge that an objective of a conspiracy was being considered or attempted, or mere approval of the purpose of a conspiracy, is not enough to prove that the person joined in a conspiracy.

The agreement may last a long time or a short time. The members of an agreement do not all have to join it at the same time. You may find that the defendant joined the agreement even if you find that the defendant did not know all the details of the agreement.

A person may be a member of the agreement even if the person does not know all

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INSTRUCTION NO. 3 (Cont'd)

of the other members of the agreement or the person agreed to play only a minor part in the agreement.

To help you decide whether the defendant agreed to “defraud” the United States Bankruptcy Court for the Northern District of Iowa, you should consider that for the purposes of Count 1 only “defrauding” is not limited to its ordinary meaning of cheating the government out of money or property; it also includes impairing, obstructing, defeating, or interfering with the lawful function of the United States Bankruptcy Court for the Northern District of Iowa by deceit, craft, trickery, or dishonest means. You may consider this definition of “defrauding” the United States Bankruptcy Court for the Northern District of Iowa, keeping in mind that this count of the indictment only charges a conspiracy to defraud and does not charge that the United States Bankruptcy Court for the Northern District of Iowa was defrauded.

Element Three –

Element Three of Count 1 requires that the defendant knew the purpose of the agreement at the time the defendant joined the agreement.

A person knows the purpose of the agreement if he is aware of the agreement and does not participate in it through ignorance, mistake, carelessness, negligence, or accident. It is seldom, if ever, possible to determine directly what was in the defendant’s mind. Thus, the defendant’s knowledge of the agreement and its purpose can be proved like anything else, from reasonable conclusions drawn from the evidence.

It is not enough that the defendant and other alleged participants in the agreement to defraud the United States Bankruptcy Court for the Northern District of Iowa simply met, discussed matters of common interest, acted in similar ways, or perhaps helped one another. The defendant must have known of the existence and purpose of the agreement. Without such knowledge, the defendant cannot be guilty of conspiracy, even if his acts furthered the conspiracy.

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INSTRUCTION NO. 3 (Cont'd)

Element Four –

Element Four of Count 1 requires that one of the persons who joined the agreement took some act for the purpose of carrying out or carrying forward the agreement.

The defendant does not have to personally commit an act in furtherance of the agreement, know about it, or witness it. It makes no difference which of the participants in the agreement did the act. This is because a conspiracy is a kind of “partnership” so that under the law each member is an agent or partner of every other member and each member is bound by or responsible for the acts of every other member done to further their scheme.

The act done in furtherance of the agreement does not have to be an unlawful act. The act may be perfectly innocent in itself.

It is not necessary that the government prove that more than one act was done in furtherance of the agreement. It is sufficient if the government proves one such act; but in that event, to return a verdict of guilty, you must all agree which act was done.

INSTRUCTION NO. 4

The crime of bankruptcy concealment, as charged in Count 2 of the indictment, has four elements, which are:

One, in about 2024, a bankruptcy case was pending in the United States Bankruptcy Court for the Northern District of Iowa, in which defendant was the debtor;

Two, an ownership interest in Innovative Principle Solutions was a part of the bankruptcy estate of the debtor;

Three, the defendant knowingly concealed or caused to be concealed, or attempted to conceal, his ownership interest in Innovative Principle Solutions from the bankruptcy trustee, United States Trustee, or some person charged with the custody and control of that property; and

Four, such concealment or attempt to conceal was done with the intent to defraud.

For you to find the defendant guilty of this crime, the government must prove all these elements beyond a reasonable doubt. Otherwise, you must find the defendant not guilty of the crime charged under this count.

Instruction No. 9 further explains these elements.

INSTRUCTION NO. 5

The crime of bankruptcy concealment, as charged in Count 3 of the indictment, has four elements, which are:

One, in about March 2024, a bankruptcy case was pending in the United States Bankruptcy Court for the Northern District of Iowa, in which defendant was the debtor;

Two, an ownership interest in Conduit Direct Group was a part of the bankruptcy estate of the debtor;

Three, the defendant knowingly concealed or caused to be concealed, or attempted to conceal, his ownership interest in Conduit Direct Group from the bankruptcy trustee, United States Trustee, or some person charged with the custody and control of that property; and

Four, such concealment or attempt to conceal was done with the intent to defraud.

For you to find the defendant guilty of this crime, the government must prove all these elements beyond a reasonable doubt. Otherwise, you must find the defendant not guilty of the crime charged under this count.

Instruction No. 9 further explains these elements.

INSTRUCTION NO. 6

The crime of false bankruptcy declaration, as charged in Count 4 of the indictment, has four elements, which are:

One, on or about March 4, 2024, a bankruptcy case was pending in the United States Bankruptcy Court for the Northern District of Iowa, in which defendant was the debtor;

Two, on or about that date, the defendant made or caused to be made a false declaration in relation to the bankruptcy proceeding, omitting to disclose in a Statement of Financial Affairs for Individuals Filing for Bankruptcy the sale of a pontoon boat in about May 2023;

Three, the defendant knew the declaration was false when it was made; and

Four, the defendant did so with the intent to defraud.

For you to find the defendant guilty of this crime, the government must prove all these elements beyond a reasonable doubt. Otherwise, you must find the defendant not guilty of the crime charged under this count.

Instruction No. 9 further explains these elements.

INSTRUCTION NO. 7

The crime of false statement under oath, as charged in Count 5 of the indictment, has four elements, which are:

One, on or about April 8, 2024, a bankruptcy case was pending in the United States Bankruptcy Court for the Northern District of Iowa, in which defendant was the debtor;

Two, on or about that date, the defendant made a false statement under oath in relation to the bankruptcy proceeding by not disclosing the sale of a pontoon boat that occurred in about May 2023;

Three, the defendant knew the declaration was false when it was made; and

Four, the defendant did so with the intent to defraud.

For you to find the defendant guilty of this crime, the government must prove all these elements beyond a reasonable doubt. Otherwise, you must find the defendant not guilty of the crime charged under this count.

Instruction No. 9 further explains these elements.

INSTRUCTION NO. 8

Count 6 of the indictment charges defendant with making a false statement under oath. The defendant may be found guilty of this offense under one or more the following two theories: knowingly making a false statement under oath regarding (1) the defendant's ownership interest in Innovative Principle Solutions or (2) the defendant's ownership interest in Conduit Direct Group.

Theory One: Innovative Principle Solutions

The crime of false statement under oath, as charged in Count 6 of the indictment, has four essential elements, which are:

One, on or about April 8, 2024, a bankruptcy case was pending in the United States Bankruptcy Court for the Northern District of Iowa, in which defendant was the debtor;

Two, on or about that date the defendant made or caused to be made a false statement under oath in relation to the bankruptcy proceeding by not disclosing an ownership interest in Innovative Principle Solutions;

Three, the defendant knew the statement was false when it was made; and

Four, the defendant did so with the intent to defraud.

For you to find the defendant guilty of Count 6 under this theory, the government must prove all these elements beyond a reasonable doubt. Otherwise, you must find the defendant not guilty of the crime charged under this count. Your decision about this theory must be unanimous.

Instruction No. 9 further explains these elements.

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INSTRUCTION NO. 8 (Cont'd)

Theory Two: Conduit Direct Group

The crime of false statement under oath, as charged in Count 6 of the indictment, has four essential elements, which are:

One, on or about April 8, 2024, a bankruptcy case was pending in the United States Bankruptcy Court for the Northern District of Iowa, in which defendant was the debtor;

Two, on about that date, the defendant made or caused to be made a false statement under oath in relation to the bankruptcy proceeding by not disclosing an ownership interest in Conduit Direct Group;

Three, the defendant knew the statement was false when it was made; and

Four, the defendant did so with the intent to defraud.

For you to find the defendant guilty of Count 6 under this theory, the government must prove all these elements beyond a reasonable doubt. Otherwise, you must find the defendant not guilty of the crime charged under this count. Your decision about this theory must be unanimous.

Instruction No. 9 further explains these elements.

INSTRUCTION NO. 9

The term “debtor” means the person for whom a bankruptcy case has been commenced.

When a debtor files a petition seeking protection from creditors under the bankruptcy laws, a “bankruptcy estate” is created, which is comprised of all property belonging to the debtor, wherever located, and by whomever held, as of the time of the filing of the bankruptcy case. The “bankruptcy estate” also includes proceeds, products, rents, or profits of or from the property of the estate, but it does not include earnings from services performed by an individual after the case is filed.

“Concealment” means not only hiding property or assets, it also includes preventing the discovery of assets, transferring property or withholding information required to be made known.

Concealment of property of the estate may include transferring property to a third party or entity, destroying the property, withholding knowledge concerning the existence or whereabouts of the property, or knowingly doing anything else by which the defendant acts to hinder, unreasonably delay or defraud any creditors. The United States need not prove that the concealment was successful.

To act with “intent to defraud” means to act knowingly and with the intent to deceive someone for the purpose of causing some financial loss, loss of property or property rights to another, or bringing about a financial gain to oneself or another, to the detriment of a third party.

INSTRUCTION NO. 10

The crime of engaging in a financial transaction in property derived from specified unlawful activity, which is charged in Count 7 of the indictment, has five elements, which are:

One, on or about June 3, 2024, in the Northern District of Iowa, the defendant knowingly transferred or caused the transfer of \$23,100 from Innovative Principle Solutions' 3705 account at Collins Community Credit Union to a construction company for the purchase of a deck;

Two, the transfer was of property of a value greater than \$10,000 derived from bankruptcy concealment as defined in Instruction No. 4 or false statement under oath concerning Innovative Principle Solutions as defined in Instruction No. 8;

Three, the defendant then knew that the transfer involved proceeds of a criminal offense;

Four, the transfer took place in the United States; and

Five, the transfer in some way or degree affected interstate or foreign commerce.

For you to find the defendant guilty of this crime, the government must prove all these elements beyond a reasonable doubt. Otherwise, you must find the defendant not guilty of the crime charged under this count.

Regarding element five, the prosecution and defendant have stipulated—that is, they have agreed—that certain facts are as counsel have just stated. You must therefore treat those facts as having been proved.

Instruction No. 11 further explains these elements.

INSTRUCTION NO. 11

The phrase “financial transaction,” as used in Instruction No. 10 means a transaction which in any way or degree affects interstate commerce involving the movement of funds by wire or other means or a transaction involving the use of a financial institution which is engaged in, or the activities of which affect, interstate commerce in any way or degree.

The term “transaction,” as used above, means with respect to a financial institution, a deposit, withdrawal, transfer between accounts, exchange of currency, loan, extension of credit, purchase or sale of any stock, bond, certificate of deposit, or other monetary instrument, or any other payment, transfer, or delivery by, through, or to a financial institution, by whatever means.

The phrase “interstate commerce,” as used above, means commerce between any combination of states, territories, and possessions of the United States, including the District of Columbia.

It is not necessary for the prosecution to show that the defendant actually intended or anticipated an effect on interstate or foreign commerce. All that is necessary is that interstate or foreign commerce was affected as a natural and probable consequence of the defendant’s actions.

You may find an effect on interstate or foreign commerce has been proven if you find from the evidence beyond a reasonable doubt that the financial transactions themselves affected interstate or foreign commerce or that financial institutions such as Collins Community Credit Union affect interstate or foreign commerce.

It is not necessary for the prosecution to show that the defendant’s transaction with a financial institution, that is with Collins Community Credit Union, itself affected interstate commerce. All that is necessary is that at the time of the alleged offense Collins Community Credit Union was engaged in or had other activities which affected interstate

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INSTRUCTION NO. 11 (Cont'd)

commerce in any way or degree.

You may find that the transaction involved the use of a financial institution which engaged in or the activities of which affected interstate commerce in any way or degree if you find from the evidence beyond a reasonable doubt that the financial institution sent funds by wire transfers to other states.

The term “proceeds” means any property, or any interest in property, that someone derives from, or obtains or retains, either directly or indirectly, as a result of the commission of bankruptcy concealment or false statement under oath regarding Innovative Principle Solutions as defined in Instruction Nos. 4 and 8.

It does not matter whether the person who committed the underlying crime, and thereby acquired or retained the proceeds, was the defendant. It is a crime to conduct a financial transaction involving property that is the proceeds of a crime, even if that crime was committed by another person, as long as all the elements of the offense are satisfied.

The prosecution is not required to trace the property it alleges to be proceeds of bankruptcy concealment or false statement under oath to a particular underlying offense. It is sufficient if the prosecution proves that the property was the proceeds of bankruptcy concealment or false statement under oath generally.

The prosecution need not prove that all the property involved in the transaction was the proceeds of bankruptcy concealment or false statement under oath. It is sufficient if the prosecution proves that at least part of the property represents such proceeds. The prosecution need not prove that the property involved in the transaction was the proceeds of both bankruptcy concealment or false statement under oath. It is sufficient if the prosecution proves that at least part of the property represents the proceeds of one of

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INSTRUCTION NO. 11 (Cont'd)

those activities.

The phrase “specified unlawful activity,” means any one of a large variety of offenses defined by statute. I instruct you as a matter of law that bankruptcy concealment or false statement under oath fall within the definition.

The phrase “knew the money represented the proceeds of some form of unlawful activity,” means that the defendant knew the property involved in the transaction represented proceeds from some form, though not necessarily which form, of activity that constitutes a felony offense under federal law. Thus, the prosecution need not prove that the defendant specifically knew that the money involved in the financial transaction represented the proceeds of bankruptcy concealment or false statement under oath or any other specific offense; it need only prove that he knew it represented the proceeds of some form, though not necessarily which form, of felony under federal law. I instruct you as a matter of law that bankruptcy concealment or false statement under oath are felonies under federal law.

INSTRUCTION NO. 12

The government is not required to prove that the defendant knew that his acts or omissions were unlawful. An act is done knowingly if the defendant is aware of the act and does not act through ignorance, mistake or accident.

Knowledge may be proved like anything else. You may consider any acts done or statements made by the defendant in connection with the offense, and all the facts and circumstances in evidence which may aid in a determination of the defendant's knowledge.

Intent may be proven by circumstantial evidence. It rarely can be established by other means. Although witnesses may see or hear and thus be able to give direct evidence of what a person does or fails to do, there can be no eyewitness account of the state of mind with which the acts were done or omitted. But what a defendant does or fails to do may indicate intent or lack of intent to commit an offense.

You may consider it reasonable to draw the inference and find that a person intends the natural and probable consequences of acts knowingly done, but you are not required to do so. As I have said, it is entirely up to you to decide what facts to find from the evidence.

INSTRUCTION NO. 13

Certain summary charts may be admitted in evidence. You may use those summary charts as evidence, even though the underlying documents and records are not here.

INSTRUCTION NO. 14

It will be your duty as jurors to decide from the evidence whether the defendant is guilty or not guilty of the crimes charged. From the evidence, you will decide what the facts are. You are entitled to consider that evidence in the light of your own observations and experiences in the affairs of life. You may use reason and common sense to draw deductions or conclusions from facts which have been established by the evidence. You will then apply those facts to the law which I give you in my instructions. You are the sole judges of the facts, but you must follow the law as stated in my instructions, whether you agree with it or not.

Do not allow sympathy or prejudice to influence you. The law demands of you just verdict, unaffected by anything except the evidence, your common sense, and the law as I give it to you.

You should not take anything I may say or do during the trial as indicating what I think of the evidence or what I think your verdicts should be.

Finally, please remember that only this defendant, not anyone else, is on trial here, and that the defendant is on trial only for the crimes charged, not for anything else.

INSTRUCTION NO. 15

I have mentioned the word “evidence.” The “evidence” in this case consists of the following: the testimony of the witnesses, the documents and other things received as exhibits, and the facts that have been stipulated to—that is, formally agreed to by the parties.

Certain things are not evidence. I will list those things again for you now:

1. Statements, arguments, questions and comments by the lawyers are not evidence.
2. Anything that might have been said by jurors, the attorneys, or the judge during the jury selection process is not evidence.
3. Objections are not evidence. The parties have a right to object when they believe something is improper. You should not be influenced by objections. If I sustained an objection to a question, you must ignore the question and must not try to guess what the answer might have been.
4. Testimony that I strike from the record, or tell you to disregard, is not evidence and must not be considered.
5. Anything you see or hear about this case outside the courtroom is not evidence.

During the trial, documents and objects may be referred to but not admitted into evidence. In such a case, these items will not be available to you in the jury room during deliberations.

Furthermore, a particular item of evidence is sometimes received for a limited purpose only. That is, it can be used by you only for one particular purpose, and not for any other purpose. I will tell you if this occurs and instruct you on the purposes for which the item can and cannot be used.

INSTRUCTION NO. 16

There are two types of evidence from which you may properly find the truth as to the facts of this case: direct evidence and circumstantial evidence. Direct evidence is the evidence of the witnesses to a fact or facts of which they have knowledge by means of their senses. The other is circumstantial evidence—the proof of a chain of circumstances pointing to the existence or nonexistence of certain facts. The law makes no distinction between direct and circumstantial evidence. You should give all evidence the weight and value you believe it is entitled to receive.

INSTRUCTION NO. 17

The jurors are the sole judges of the weight and credibility of the testimony, and the value to be given to the testimony, of each witness who testifies in this case. In deciding what the facts are, you may have to decide what testimony you believe and what testimony you do not believe. You may believe all of what a witness says, or only part of it, or none of it.

In deciding what testimony of any witness to believe, consider the witness's intelligence, the opportunity the witness had to have seen or heard the things testified about, the witness's memory, any motives that witness may have for testifying a certain way, the manner of the witness while testifying, whether that witness said something different at an earlier time, the general reasonableness of the testimony, and the extent to which the testimony is consistent with other evidence that you believe.

In deciding whether to believe a witness, keep in mind that people sometimes hear or see things differently and sometimes forget things. You need to consider, therefore, whether a contradiction is an innocent misrecollection or lapse of memory or an intentional falsehood, and that may depend on whether it has to do with an important fact or only a small detail.

If the defendant chooses to testify, you should judge that testimony in the same manner as you judge the testimony of any other witness.

INSTRUCTION NO. 18

In the previous instruction, I instructed you generally on the credibility of witnesses. I now give you this further instruction on how the credibility of a witness can be “impeached” and how you are to consider the testimony of certain witnesses.

A witness may be discredited or impeached by contradictory evidence; by showing that the witness testified falsely concerning a material matter; by showing that the witness has a motive to be untruthful; or by evidence that at some other time the witness has said or done something, or has failed to say or do something, that is inconsistent with the witness’s present testimony.

INSTRUCTION NO. 19

You may hear testimony from persons who may be knowledgeable in a field because of their education, experience, or both. They are permitted to give their opinions on matters in that field and may also state the reasons for their opinions.

Such testimony should be considered just like any other testimony. You may accept or reject the testimony of these witnesses just like any other testimony. After considering such a witness's education and experience, the reasons given for the opinion, and all the other evidence in the case, you may give that witness' testimony whatever weight, if any, you think it deserves.

INSTRUCTION NO. 20

You may hear testimony that the defendant made statements to certain witnesses in this case. It is for you to decide:

First, whether the defendant made the statements; and

Second, if so, how much weight you should give to them.

In making these two decisions you should consider all the evidence, including the circumstances under which the statement may have been made.

INSTRUCTION NO. 21

You may hear audio recordings of a bankruptcy proceeding. This proceeding was legally recorded, and you may consider the recordings just like any other evidence.

You may also see transcripts of the recordings I have just mentioned. These transcripts are provided to aid you in listening to the recordings. The transcripts also undertake to identify the speakers engaged in the conversation.

Differences in meaning between what you hear in the recordings and read in the transcripts may be caused by such things as the inflection in a speaker's voice. You should, therefore, rely on what you hear rather than what you read when there is a difference.

The transcripts themselves are not evidence, and will not be provided to the jury during deliberations. Rather, the transcripts are only an aid to the jury in understanding the recordings. The recordings, not the transcripts, are the evidence.

INSTRUCTION NO. 22

Exhibits will be admitted into evidence and are to be considered along with all the other evidence to assist you in reaching your verdicts. During your deliberations, you are not to tamper with the exhibits or their contents, and you should leave the exhibits in the jury room in the same condition as you received them.

INSTRUCTION NO. 23

Reasonable doubt is doubt based upon reason and common sense, and not doubt based on speculation. A reasonable doubt may arise from careful and impartial consideration of all the evidence, or from a lack of evidence. Proof beyond a reasonable doubt is proof of such a convincing character that a reasonable person, after careful consideration, would not hesitate to rely and act upon that proof in life's most important decisions. Proof beyond a reasonable doubt is proof that leaves you firmly convinced of the defendant's guilt. Proof beyond a reasonable doubt does not mean proof beyond all possible doubt.

INSTRUCTION NO. 24

At the end of the trial, you must make your decisions based on what you recall of the evidence. You will not have a written transcript to consult. Therefore, you must pay close attention to the testimony as it is given.

If you wish, you may take notes during the presentation of evidence to help you remember what witnesses said. If you do take notes, please keep them to yourself until you and your fellow jurors go to the jury room to decide the case. Do not let note-taking distract you so that you do not hear other answers by the witnesses.

During deliberations, in any conflict between your notes, a fellow juror's notes, and your memory, your memory must prevail. Remember that notes sometimes contain the mental impressions of the note taker and can be used only to help you recollect what the testimony was.

We have given each juror an envelope with a pad and pen in it. The envelopes are numbered according to your seat in the jury box. When you leave for breaks or at night, please put your pad and pen in the envelope and leave the envelope on your chair. Your notes will be secured, and they will not be read by anyone. At the end of trial and your deliberations, your notes should be left in the jury room for destruction.

INSTRUCTION NO. 25

During the trial, it may be necessary for me to talk with the lawyers out of the hearing of the jury, either by having a bench conference while the jury is present in the courtroom or by calling a recess. If a bench conference is held in the courtroom, we will switch on what we refer to as “white noise” so that the jurors cannot hear what the lawyers and I are saying. While bench conferences are being conducted, you should feel free to stand and stretch and visit among yourselves about anything except the case.

INSTRUCTION NO. 26

The trial will proceed in the following manner:

First, the attorney for the government will make an opening statement. Next, the attorney for the defendant may, but does not have to, make an opening statement. An opening statement is not evidence but is simply a summary of what the attorneys expect the evidence to be.

The government will then present its evidence, and the attorneys for the defendant may cross-examine the government's witnesses. Following the government's case, the defendant may, but does not have to, present evidence, testify, or call other witnesses. If the defendant calls witnesses, the attorney for the government may cross-examine them.

After the presentation of evidence is completed, the attorneys will make their closing arguments to summarize and interpret the evidence for you. As with opening statements, closing arguments are not evidence. After that, the court will instruct you further regarding your deliberations, and you will retire to deliberate on your verdicts.

INSTRUCTION NO. 27

During the course of the trial, to ensure fairness, you as jurors must obey the following rules.

First, do not talk among yourselves about this case, or about anyone involved with it, until the end of the case when you go to the jury room to decide on your verdicts.

Second, do not talk with anyone else about this case, or about anyone involved with it, until the trial has ended and you have been discharged as jurors.

Third, do not use any electronic device or media, such as the telephone, a cell or smart phone, Blackberry, PDA, computer, the Internet, any Internet service, any text or instant messaging service, any Internet chat room, blog, or website such as Facebook, YouTube, or X (formerly Twitter), to communicate to anyone any information about this case, or your opinions concerning it, until the trial has ended and you have been discharged as jurors.

Fourth, when you are outside the courtroom, do not let anyone tell you anything about the case, or about anyone involved with it, until the trial has ended and your verdicts have been accepted by me. If someone should try to talk with you about the case during the trial, please report it to me through the Court Security Officer.

Fifth, during the trial, you should not talk with or speak to any of the parties, lawyers or witnesses involved in this case—you should not even pass the time of day with any of them. It is important not only that you do justice in this case, but that you also give the appearance of doing justice. If a person from one side of the case sees you talking to a person from the other side—even if it is simply to pass the time of day—an unwarranted and unnecessary suspicion about your fairness might be aroused. If any lawyer, party, or witness does not speak to you when you pass in the hall or the like, it is because they are not supposed to talk or visit with you.

Sixth, do not read any news stories or articles about the case, or about anyone involved with it, or listen to any radio or television reports about the case, or about

(CONTINUED)

INSTRUCTION NO. 27 (Cont'd)

anyone involved with it. In fact, until the trial is over, I suggest that you avoid reading any newspapers or news journals at all, and avoid listening to any TV or radio newscasts at all. I do not know whether there might be any news reports of this case, but, if there are, you might inadvertently find yourself reading or listening to something before you could do anything about it. If you want, you can have your spouse or a friend clip out any stories and set them aside to give you after the trial is over. I can assure you, however, that by the time you have heard the evidence in this case you will know more about the matter than anyone will learn through the news media.

Seventh, do not do any research or make any investigation about the case on your own. Do not consult any reference materials such as the Internet, books, magazines, dictionaries, or encyclopedias. Do not contact anyone to ask them questions about issues that may arise in this case. Remember, you are not permitted to talk to anyone (except your fellow jurors) about this case or anyone involved with it until the trial has ended and I have discharged you as jurors.

Eighth, do not make up your mind during the trial about what the verdicts should be. Keep an open mind until after you have gone to the jury room to decide the case and you and your fellow jurors have discussed the evidence.

Dated this _____ day of February, 2026.

C.J. WILLIAMS, Chief Judge
United States District Court
Northern District of Iowa

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 25-CR-00049-CJW
)	
vs.)	FINAL JURY
)	INSTRUCTIONS
DENNIS CLIFFORD BRUCE,)	
)	
Defendant.)	

Members of the Jury:

The instructions I gave you at the beginning of the trial and during the trial remain in effect. I will now give you some additional instructions before you begin your deliberations.

You must, of course, continue to follow the instructions I gave you earlier, as well as those I give you now. You must not single out some instructions and ignore others, because all are important. This is true even though the instructions I gave you at the beginning of and during trial are not repeated here.

INSTRUCTION NO. 28

There is no burden upon defendant to prove that he is innocent. Instead, the burden of proof remains on the government throughout the trial. Accordingly, you must not consider, or even discuss in the jury room, that defendant did not testify in this trial.

INSTRUCTION NO. 29

One of the issues in this case is whether the defendant acted in good faith. The essence of the good faith defense is that one who acts with honest intentions cannot be convicted of a crime requiring fraudulent intent. Good faith is a complete defense to the crimes of conspiracy, bankruptcy concealment, false bankruptcy declaration, and false statement under oath if the defendant did not act with the intent to defraud, which is an element of the charge. Good faith is not a defense to the crime of engaging in a monetary transaction in property derived from specified unlawful activity. In other words, good faith is a defense to Counts 1, 2, 3, 4, 5 and 6, but not Count 7.

Good faith includes, among other things, an opinion or belief that is honestly held, even if the opinion is in error or the belief is mistaken. However, even though a defendant honestly held a certain opinion or belief (such as a belief that a business venture would ultimately succeed, that investors would make a profit, or that investors would not lose money), a defendant does not act in good faith if he or she also knowingly made false or fraudulent representations or promises, or otherwise acted with the intent to defraud or deceive another. Proof of fraudulent intent requires more than proof that a defendant only made a mistake in judgment or management, or was careless.

The government has the burden of proving beyond a reasonable doubt that the defendant acted with the intent to defraud. Evidence that the defendant acted in good faith may be considered by you, together with all the other evidence, in determining whether the defendant acted with the intent to defraud.

INSTRUCTION NO. 30

In conducting your deliberations and returning your verdicts, there are certain rules you must follow. I will list those rules for you now.

First, when you go to the jury room, you must select one of your members as your foreperson. That person will preside over your discussions and speak for you here in court.

Second, it is your duty, as jurors, to discuss this case with one another in the jury room. You should try to reach an agreement if you can do so without violence to individual judgment, because your verdicts—whether guilty or not guilty—must be unanimous.

Each of you must make your own conscientious decisions, but only after you have considered all the evidence, discussed it fully with your fellow jurors and listened to the views of your fellow jurors.

Do not be afraid to change your opinions if your discussion persuades you that you should. But do not come to a decision simply because other jurors think it is right or simply to reach your verdicts.

Third, if you find the defendant guilty, the sentence to be imposed is my responsibility. You may not consider punishment in any way when deciding whether the government has proved its case beyond a reasonable doubt.

Fourth, if you need to communicate with me during your deliberations, you may send a note to me through the Court Security Officer, signed by one or more jurors. I will respond as soon as possible either in writing or orally in open court.

Remember that you should not tell anyone—including me—how your votes stand numerically.

Fifth, your verdicts must be based solely on the evidence and on the law that I have given to you in my instructions. Each verdict, whether guilty or not guilty, must be unanimous. Nothing I have said or done is intended to suggest what your verdicts should be—that will be entirely for you to decide.

INSTRUCTION NO. 31

Attached to these instructions you will find Verdict Forms and an Interrogatory Form. These forms are simply the written notices of the decisions that you reach in this case. The answers to these forms must be the unanimous decisions of the Jury.

You will take these forms to the jury room, and when you have completed your deliberations and each of you has agreed to the answers to the forms, your foreperson will fill out the forms, sign and date them, and advise the Court Security Officer that you are ready to return to the courtroom. Your foreperson should place the signed forms in the blue folder, which the court will provide you, and then your foreperson will bring the blue folder when returning to the courtroom.

Finally, members of the Jury, take this case and give it your most careful consideration, and then without fear or favor, prejudice or bias of any kind, return the Verdict Forms and Interrogatory Form in accord with the evidence and these instructions.

Dated this ____ day of _____, 2026.

C.J. WILLIAMS, Chief Judge
United States District Court
Northern District of Iowa

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 25-CR-00049-CJW
)	
vs.)	VERDICT FORM
)	FOR COUNT 1
DENNIS CLIFFORD BRUCE,)	
)	
Defendant.)	

Count 1 – Conspiracy

We, the Jury, unanimously find the defendant, Dennis Clifford Bruce,
_____ [Not Guilty/Guilty] of the crime of conspiracy as charged in Count
1 of the Indictment.

NOTE: If you unanimously find the defendant not guilty of Count 1, have your foreperson write “not guilty” in the above blank space, and sign and date this Verdict Form. If you unanimously and beyond a reasonable doubt find the defendant guilty of Count 1, have your foreperson write “guilty” in the above blank space and sign and date this Verdict Form.

FOREPERSON

DATE

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 25-CR-00049-CJW
)	
vs.)	INTERROGATORY FORM
)	FOR COUNT 1
DENNIS CLIFFORD BRUCE,)	
)	
Defendant.)	

If you found the defendant guilty of the crime charged in Count 1 of the Indictment, please answer the following question, then have your foreperson sign and date this Interrogatory Form. If you found the defendant not guilty of the crime charged in Count 1 of the Indictment, do not answer the following question contained in this Interrogatory Form.

We, the Jury, unanimously and beyond a reasonable doubt find that the following overt acts were committed:

_____ On or about January 31, 2024, opening an account ending in 3705 at Collins Community Credit Union in the name of Innovative Principle Solutions with Kaylee Bruce as its sole signatory;

_____ On or about April 4, 2024, adding defendant Dennis Bruce as a signatory on Innovative Principle Solutions 3705 account at Collins Community Credit Union;

_____ On or about May 9, 2024, submitting a Standard Form 1449 to the National Aeronautics and Space Administration (“NASA”), which bore defendant Dennis Bruce’s signature as Innovative Principle Solutions “Principle”;

_____ In or about 2024 and early 2025, receiving \$483,972.47 from NASA into the 3705 account at Collins Community Credit Union and in the name of Innovative Principle Solutions;

(CONTINUED)

INTERROGATORY FORM FOR COUNT 1 (Cont'd)

_____ On or about August 20, 2024, removing defendant Dennis Bruce as a signatory on Innovative Principle Solutions 3705 account at Collins Community Credit Union; and

_____ On or about August 29, 2024, causing Ronald Martin to file on behalf of defendant Dennis Bruce an “Answer to Complaint to Deny Discharge” in *In re Dennis Clifford Bruce*, Case Number 24-00179, in the United States Bankruptcy Court for the Northern District of Iowa, which stated, among other things, that “[t]he only connection Defendant [Dennis Bruce] has with [Innovative Principle Solutions] is industry knowledge and contacts that he has passed on to [Kaylee Bruce].”

NOTE: Place a check mark (✓) on all the overt acts you find the government proved beyond a reasonable doubt.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 25-CR-00049-CJW
)	
vs.)	VERDICT FORM
)	FOR COUNT 2
DENNIS CLIFFORD BRUCE,)	
)	
Defendant.)	

Count 2 – Bankruptcy Concealment

We, the Jury, unanimously find the defendant, Dennis Clifford Bruce,
_____ [Not Guilty/Guilty] of the crime of bankruptcy concealment as
charged in Count 2 of the Indictment.

NOTE: If you unanimously find the defendant not guilty of Count 2, have your foreperson write “not guilty” in the above blank space, and sign and date this Verdict Form. If you unanimously and beyond a reasonable doubt find the defendant guilty of Count 2, have your foreperson write “guilty” in the above blank space and sign and date this Verdict Form.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 25-CR-00049-CJW
)	
vs.)	VERDICT FORM
)	FOR COUNT 3
DENNIS CLIFFORD BRUCE,)	
)	
Defendant.)	

Count 3 – Bankruptcy Concealment

We, the Jury, unanimously find the defendant, Dennis Clifford Bruce,
_____ [Not Guilty/Guilty] of the crime of bankruptcy concealment as
charged in Count 3 of the Indictment.

NOTE: If you unanimously find the defendant not guilty of Count 3, have your foreperson write “not guilty” in the above blank space, and sign and date this Verdict Form. If you unanimously and beyond a reasonable doubt find the defendant guilty of Count 3, have your foreperson write “guilty” in the above blank space and sign and date this Verdict Form.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 25-CR-00049-CJW
)	
vs.)	VERDICT FORM
)	FOR COUNT 4
DENNIS CLIFFORD BRUCE,)	
)	
Defendant.)	

Count 4 – False Bankruptcy Declaration

We, the Jury, unanimously find the defendant, Dennis Clifford Bruce,
_____ [Not Guilty/Guilty] of the crime of false bankruptcy declaration as
charged in Count 4 of the Indictment.

NOTE: If you unanimously find the defendant not guilty of Count 4, have your foreperson write “not guilty” in the above blank space, and sign and date this Verdict Form. If you unanimously and beyond a reasonable doubt find the defendant guilty of Count 4, have your foreperson write “guilty” in the above blank space and sign and date this Verdict Form.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 25-CR-00049-CJW
)	
vs.)	VERDICT FORM
)	FOR COUNT 5
DENNIS CLIFFORD BRUCE,)	
)	
Defendant.)	

Count 5 – False Statement Under Oath

We, the Jury, unanimously find the defendant, Dennis Clifford Bruce,
_____ [Not Guilty/Guilty] of the crime of false statement under oath as
charged in Count 5 of the Indictment.

NOTE: If you unanimously find the defendant not guilty of Count 5, have your foreperson write “not guilty” in the above blank space, and sign and date this Verdict Form. If you unanimously and beyond a reasonable doubt find the defendant guilty of Count 5, have your foreperson write “guilty” in the above blank space and sign and date this Verdict Form.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 25-CR-00049-CJW
)	
vs.)	VERDICT FORM
)	FOR COUNT 6
DENNIS CLIFFORD BRUCE,)	
)	
Defendant.)	

Count 6 – False Statement Under Oath

***Theory One:
Innovative Principle Solutions***

We, the Jury, unanimously find the defendant, Dennis Clifford Bruce,
_____ [Not Guilty/Guilty] of the crime of false statement under oath as
charged in Count 6 of the Indictment under Theory One, concerning Innovative Principle
Solutions.

NOTE: If you unanimously find the defendant not guilty the crime charged
in the Indictment under Theory One, have your foreperson write “not guilty”
in the above blank space, and sign and date this Verdict Form. If you
unanimously and beyond a reasonable doubt find the defendant guilty of the
crime charged in the Indictment under Theory One, have your foreperson
write “guilty” in the above blank space and sign and date this Verdict Form.

Go on to consider Theory Two.

(CONTINUED)

VERDICT FORM FOR COUNT 6 (Cont'd)

***Theory Two:
Conduit Direct Group***

We, the Jury, unanimously find the defendant, Dennis Clifford Bruce,
_____ [Not Guilty/Guilty] of the crime of false statement under oath as
charged in Count 6 of the Indictment under Theory Two, concerning Conduit Direct Group.

NOTE: If you unanimously find the defendant not guilty the crime charged in the Indictment under Theory Two, have your foreperson write “not guilty” in the above blank space, and sign and date this Verdict Form. If you unanimously and beyond a reasonable doubt find the defendant guilty of the crime charged in the Indictment under Theory Two, have your foreperson write “guilty” in the above blank space and sign and date this Verdict Form.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 25-CR-00049-CJW
)	
vs.)	VERDICT FORM
)	FOR COUNT 7
DENNIS CLIFFORD BRUCE,)	
)	
Defendant.)	

Count 7 – Engaging in a Monetary Transaction in Property Derived from Specified Unlawful Activity

We, the Jury, unanimously find the defendant, Dennis Clifford Bruce, _____ [Not Guilty/Guilty] of the crime of engaging in a monetary transaction in property derived from specified unlawful activity as charged in Count 7 of the Indictment.

NOTE: If you unanimously find the defendant not guilty of Count 7, have your foreperson write “not guilty” in the above blank space, and sign and date this Verdict Form. If you unanimously and beyond a reasonable doubt find the defendant guilty of Count 7, have your foreperson write “guilty” in the above blank space and sign and date this Verdict Form.

FOREPERSON

DATE