

JUDGE PARKER’S STANDARD CRIMINAL JURY INSTRUCTIONS WORK SHEET

- If the entry is in CAPITAL LETTERS, you must include it in the jury instruction packet
- If the entry is underlined, the parties will supply that instruction.
- An * means that the instruction must be individualized.
- Instruction numbers beginning with “Cr.” refer to the instructions as they are provided on this web page.

I. CRIME CHARGED

_____ CAPTION; COURT WILL INSTRUCT* Cr.01

_____ DUTY TO FOLLOW INSTRUCTIONS

A. ___ (single defendant on trial) Cr.02a

B. ___ (multiple defendants on trial) Cr.02b

_____ CHARGE AND PLEA* (supplied by Government)

_____ BURDEN OF PROOF; REASONABLE DOUBT

A. ___ (all defendants testify) Cr.03a

B. ___ (any defendant does not testify) Cr.03b

_____ SUBSTANTIVE OFFENSE (CODE PROVISIONS/ELEMENTS)

Use 10th Circuit Pattern Criminal Jury Instructions, with the following exception:
 ___ "on or about" and definitions (if necessary) Cr.04g

II. DEFENSES

Use 10th Circuit Pattern Criminal Jury Instructions

III. EVIDENCE

_____ EVIDENCE - ARGUMENT OF COUNSEL Cr.14

_____ DIRECT/CIRCUMSTANTIAL EVIDENCE Cr.15

_____ CREDIBILITY OF WITNESSES Cr.16

_____ IMPEACHMENT

- A. ___ (inconsistent statement only & no defendant testifies) Cr.17a
- B. ___ (inconsistent statement, a felony conviction & no defendant testifies) Cr.17b
- C. ___ (inconsistent statement & a defendant testifies) Cr.17c
- D. ___ (inconsistent statement & a defendant testifies with a felony conviction) Cr.17d
- E. ___ (witness has felony conviction & deft testifies without a felony conviction) (use with "A") Cr.17e
- F. ___ (witness has felony conviction & deft testifies with a felony conviction) (use with "A") Cr.17f
- G. ___ (bad reputation for truth) (use with one of the above) Cr.17g
- H. ___ (felony conviction & bad reputation for truth) (use with one of the above) Cr.17h

_____	Expert testimony	Cr.18
_____	Testimony of accomplice or informer	
	A. ____ (accomplice or informer)	Cr.19a
	B. ____ (co-defendant who entered into a plea agreement)	Cr.19b
_____	Witness on addictive drugs	Cr.20
_____	Character evidence	Cr.21
_____	Confession; voluntariness	
	Use 10th Circuit Pattern Criminal Jury Instruction 1.25 (single defendant) or 1.26 (multiple defendants). Combine with 10th Circuit Instruction 1.05.1	
_____	Identification testimony	Cr.23
_____	Similar acts evidence	Cr.24

IV. DELIBERATION

_____	CAUTION; PUNISHMENT	
	A. ____ (single defendant & single count)	Cr.25a
	B. ____ (single defendant & multiple counts)	Cr.25b
	C. ____ (multiple defendants & single count)	Cr.25c
	D. ____ (multiple defttts & multiple counts)	Cr.25d
_____	DUTY TO DELIBERATE	Cr.26a
_____	JUROR USE OF SOCIAL MEDIA	Cr.26b
_____	EXPLANATION OF VERDICT FORM(S)	
	A. ____ (single verdict form)	Cr.27a
	B. ____ (multiple verdict forms)	Cr.27b
_____	<u>VERDICT FORMS(S) *</u>	

V. OTHER INSTRUCTIONS

_____	“STIPULATION” DEFINITION	Cr.101
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