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## **JUDGE GONZALES' STANDARD CRIMINAL JURY INSTRUCTIONS WORK SHEET**

### **I. CRIME CHARGED**

- CAPTION; COURT WILL INSTRUCT\* (Cr.01)
- DUTY TO FOLLOW INSTRUCTIONS
  - (single defendant on trial) (Cr.02a)
  - (multiple defendants on trial) (Cr.02b)
- CHARGE AND PLEA\* (supplied by government)
- BURDEN OF PROOF; REASONABLE DOUBT
  - (all defendants testify) (Cr.03a)
  - (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)
- JURY NOTETAKING (Cr. 14a)
- DIRECT/CIRCUMSTANTIAL EVIDENCE (Cr.15)
- CREDIBILITY OF WITNESSES (Cr.16)
- IMPEACHMENT
  - (inconsistent statement only & no defendant testifies) (Cr.17a) use with:
    - (witness has felony conviction & deft testifies w/out felony conviction) (Cr.17e)
    - (witness has felony conviction & deft testifies with felony conviction) (Cr.17f)
  - (inconsistent statement, a felony conviction & no defendant testifies) (Cr.17b)
  - (inconsistent statement & a defendant testifies) (Cr.17c)
  - (inconsistent statement & a defendant testifies with a felony conviction) (Cr.17d)
    - (bad reputation for truth) (use with one of the above) (Cr.17g)
    - (felony conviction & bad reputation for truth) (use with one of the above) (Cr.17h)
- Expert testimony (Cr.18)
- Testimony of accomplice or informer
  - (accomplice or informer) (Cr.19a)
  - (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

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defendants). Combine with 10th Circuit Instruction 1.05.1

- Identification testimony (**Cr.23**)
- Similar acts evidence (**Cr.24**)
- Use of Spanish Interpreter (**Cr.24a**)
- English Transcript Of Spanish (**Cr.24b**)
- “Stipulation” Definition (**Cr.24c**)

#### **IV. DELIBERATION**

- CAUTION; PUNISHMENT
  - (single defendant & single count) (**Cr.25a**)
  - (single defendant & multiple counts) (**Cr.25b**)
  - (multiple defendants & single count) (**Cr.25c**)
  - (multiple defendants & multiple counts) (**Cr.25d**)
  - COURT’S DUTY TO DECIDE PUNISHMENT (**Cr.25e**)
- DUTY TO DELIBERATE (**Cr.26a**)
- JUROR USE OF SOCIAL MEDIA (**Cr.26b**)
- EXPLANATION OF VERDICT FORM(S)
  - (single verdict form) (**Cr.27a**)
  - (multiple verdict forms) (**Cr.27b**)
- VERDICT FORMS(S) \*

#### **V. OTHER INSTRUCTIONS**

- TOOLS OF THE DRUG TRADE (FIREARMS) (**Cr.28**)
- JANE/JOHN DOE (**Cr. 29**)